
Safeguarding Policy

Purpose

EDC must maintain a safe, productive, and respectful work environment for all colleagues, partners, and program participants. Employees must prevent and respond to physical or sexual abuse, exploitation, harassment, or bullying of the individuals in the communities we serve and the people with whom we work or partner. This policy informs EDC employees and associated personnel, including, but not limited to, board members, consultants, volunteers, and interns. In addition, this policy also applies to non-EDC entities and their employees who have entered into partnerships, subgrants, or subrecipient agreements with EDC regardless of the funding source.

To report a safeguarding concern, contact [IntegrityCounts](#), EDC's ethics and compliance portal.

This policy uses language that is common across the safeguarding, development, and humanitarian sectors. We rely on widely recognized definitions to promote clarity, consistency, and alignment with donor expectations and applicable laws.

Note: This Safeguarding Policy complements EDC's existing policies related to [Code of Business Conduct](#), [Anti-Harassment Policy](#), [Non-Discrimination Policy](#), and the [Speak Up! Integrity Reporting and Whistleblower Policy](#).

Scope

This policy applies globally to all EDC employees and associated personnel working on or visiting EDC and subrecipient programs during and outside normal working hours. In countries where local legislation conflicts with this policy, EDC will follow whichever provides greater protection to vulnerable populations.

I. Policy Statement

EDC believes that every person we interact with has the right to be protected from all forms of harm, abuse, neglect, and exploitation. EDC will not tolerate abuse and exploitation, neglect, harassment, or bullying by employees or associated personnel. This policy addresses the following:

- Child safeguarding
- Adult safeguarding
- Prevention of sexual exploitation and abuse

EDC is committed to safeguarding through the three pillars of prevention, reporting, and response.

II. Prevention

EDC employees and associated personnel are obligated to use their position respectfully and must not abuse their power and influence over program participants or other community members. The following responsibilities are based on the six Core Principles from the United Nation's *Secretary-General's Bulletin: Special Measures for Protection from Sexual Exploitation and Abuse*¹ (ST/SGB/2003/13). See [Annex A](#) for full descriptions of these principles.

Staff Responsibilities

EDC employees and associated personnel:

- Will not solicit services or sexual favors from program participants, children, vulnerable adults, or others in the communities where EDC works, and will not engage in sexually exploitative or abusive relationships.
- Will not engage in quid pro quos or exchange or withhold money, employment, goods, or services, including transportation, for sex, including sexual favors or other forms of humiliating, degrading, or exploitative behavior.
- May not engage the services of sex workers, irrespective of any local law that permits such activity.
- Are prohibited from having sex or engaging in sexual activities with program participants.
- Must refrain from sexual activity with anyone under 18, regardless of local age of consent laws. Ignorance or mistaken belief of the person's age is not a defense.
- Will not support or engage in any sexually exploitative or abusive activities, including, but not limited to, child pornography or human trafficking.
- Will treat all children with respect and avoid inappropriate, harassing, abusive, sexually provocative, demeaning, or culturally insensitive language or behavior.
- Will not engage children in labor that is inappropriate for their age or development, interferes with their education or recreation, or poses a risk of injury, even if said labor is culturally acceptable.

¹ United Nations, Secretariat. (2003, October 9). *Secretary-General's bulletin: Special measures for protection from sexual exploitation and abuse* (ST/SGB/2003/13). <https://www.unhcr.org/us/media/secretary-generals-bulletin-special-measures-protection-sexual-exploitation-and-sexual-abuse>

- Must ensure appropriate adult supervision when working with children, including implementation of the “two-adult rule”. The two-adult rule applies to all activities involving children and simply states that no fewer than two trained, screened adults must be present at all times. If, due to operational constraints (e.g., remote settings, limited staff, or safety concerns), the two-adult rule cannot be met, project teams must seek prior guidance from Human Resources to identify appropriate mitigation, supervision alternatives, (virtual supervision, community liaison presence, parent/guardian involvement) or risk-reduction measures. Approved mitigation measures should be documented in writing.
- Will never exploit, harass, or bully participants, children, or others using EDC’s resources, including the use of computers, cameras, mobile phones, or social media. This includes sharing explicit images via email or text messages.
- Must immediately report any concerns regarding policy violations using EDC’s reporting mechanisms (see III. Reporting below). This responsibility applies to EDC employees and associated personnel even if the suspected violator is not an EDC employee, such as implementing partners, donors, vendors, or other associated personnel.
- Must immediately disclose charges, convictions, and other outcomes related to abuse, exploitation, or neglect. Disclosure may not preclude employment automatically, but it will be reviewed by the Office of Legal Affairs.

In addition to following EDC’s [Media Policy](#), when photographing or filming a child for work-related purposes, EDC employees and associated personnel must do the following:

- Comply with local traditions or restrictions for reproducing personal images
- Obtain informed consent from the child’s parent or guardian before photographing or filming a child, and explain how the photograph or film will be used
- Ensure photographs, films, videos, and DVDs present children respectfully and not in a vulnerable or submissive manner
- Ensure children are adequately clothed and not in poses that could be seen as sexually suggestive
- Ensure images are honest representations of the context and the facts
- Ensure file labels do not reveal identifying information about a child

If you are unsure about whether a behavior constitutes a violation of these standards, you should contact EDC’s Human Resources Department or the Office of Legal Affairs.

EDC Leadership and Human Resources Responsibilities

- Managers, Supervisors, and the Human Resources Department must ensure EDC employees and associated personnel understand and comply with the policy in the context of their work activities.
- Managers, Supervisors, and the Human Resources Department are responsible for effective safeguarding practices during recruitment (including candidate screening), induction, training, and performance management to prevent sexual exploitation, abuse, and child abuse. EDC’s Human Resources department provides online safeguarding

training for employees to promote understanding of policy requirements and expected standards of conduct.

- Project Directors must provide clear guidance and demonstrate how EDC will ensure that vulnerable adults and children are protected from sexual exploitation and abuse in the delivery of projects.
- Project Directors and Country Directors or Chiefs of Party must ensure that culturally appropriate community-based complaint mechanisms are developed, implemented, monitored, and reviewed for effectiveness, and they must inform program participants and EDC personnel of these mechanisms. Community-based complaint mechanisms may include, for example, confidential reporting channels such as posters with [IntegrityCounts](#) information, suggestion or complaint boxes at project sites, trained community focal points, or in-person reporting to designated project staff.
- Both the Project Director and the Country Director or Chief of Party (when applicable) will collaborate with the Human Resources Department and the Office of Legal Affairs to address complaints, conduct investigations, and implement disciplinary actions. Additionally, Country Directors or Chiefs of Party and Project Directors, along with the Human Resources Department, are responsible for providing survivor assistance as outlined in the section [Sanction and Disciplinary Action](#) outlined later in the policy.

III. Reporting

EDC is committed to ensuring that employees, associated personnel, and program participants have culturally appropriate, safe, confidential, and accessible ways to report safeguarding misconduct claims.

- EDC personnel who observe, suspect, or receive allegations of suspected or known abuse, exploitation, or neglect related to EDC's work, employees, program participants, or partners, or any other conduct prohibited by this policy, must report the conduct immediately via the [IntegrityCounts](#) portal. Additional details are outlined in EDC's [Speak Up! Integrity Reporting & Whistleblower Policy](#).
- Managers, Supervisors, and senior employees are required to report conduct prohibited by this policy within 24 hours of becoming aware of the infraction. Failure to do so is a violation of this policy and could lead to disciplinary action, up to and including immediate termination of employment.
- While there is an option to report anonymously, EDC personnel are urged to provide as much detailed information as possible about the conduct, including, identifying people who were involved or who witnessed the conduct, so long as this will not put the persons identified at risk of harm.

Community Reporting Mechanisms

Depending on the requirements of specific funders, Project Directors must determine whether a community-based reporting mechanism is needed. This is particularly important for activities

involving direct service delivery (i.e., distribution of supplies to program participants) or when project personnel interact with populations at higher risk of safeguarding concerns, including women, girls, children, and at-risk or vulnerable adults or groups.

Best practice requires that reporting mechanisms be developed, implemented, monitored, and reviewed for effectiveness, including raising awareness with (1) program participants, (2) communities where projects are implemented, and (3) employees and related personnel about how to use the reporting mechanism.

Once received by EDC, safeguarding complaints filed by program participants via any mechanism must be routed and handled in the same fashion as complaints filed via the avenues noted earlier in this section ([III. Reporting](#)).

External Reporting

EDC and its partners must comply with mandatory reporting of safeguarding misconduct to local authorities as per local laws. Additionally, EDC may need to report alleged or confirmed safeguarding misconduct due to contractual, legal, or donor obligations. Maintaining our commitment to a survivor-centered approach, information may be shared confidentially to protect the survivor's anonymity unless otherwise required by law.

For incidents involving a child under 18 years old, EDC personnel should notify local law enforcement, social services, or child protection authorities in compliance with local mandatory reporting laws and take necessary actions to ensure the child's safety, provided it does not put the child at immediate risk. This notification must be done in close consultation with EDC's Office of Legal Affairs and local legal counsel (for international projects). A risk assessment must be done prior to notification to determine the level of risk that reporting the incident to local authorities could have on the child.

IV. Response

EDC will investigate all reports of suspected abuse, exploitation, neglect, harassment, or bullying and take appropriate remedial action, including, but not limited to, immediate termination and/or notification of law enforcement and cooperation with criminal investigation and prosecution where appropriate. See EDC's [Speak Up! Integrity Reporting & Whistleblower Policy](#) for additional information.

Responding to a Report

When responding to a report of abuse or exploitation, EDC will use a survivor-centered trauma-informed approach, which includes the following measures:

- Protect the survivor when a report or a complaint of abuse is made.
- Respect the survivor's rights and the local laws.
- Ensure that EDC's actions do not cause the survivor additional harm.

- Work with local service providers; specialists; parents, legal guardians, or caregivers; legal authorities; and others as appropriate and necessary to the survivor’s well-being and the resolution of the report or complaint.
- Require a “best interest of the child determination” for responding to alleged violations of the prohibitions when a child and/or youth is involved. This determination considers the best possible outcome for a child or youth who has been exposed to violence, abuse, exploitation, or neglect.

In some cases, EDC may need to notify its liability insurance provider of the complaint of abuse and retain records of any such reports as appropriate. In addition, EDC may need to notify the relevant funder of the project in which there was a complaint of abuse, either in writing or by email.

Non-Retaliation

EDC prohibits any retaliation against anyone who makes a formal complaint in good faith about sexual abuse, sexual exploitation, child abuse, exploitation, neglect, or other violations of this policy or related procedures, or who participates in a related investigation.

Protocols for Survivor Assistance

Survivor support assistance is of immediate concern and priority and should be provided as soon as the allegation is reported, regardless of the survivor’s involvement in any EDC-related investigation.

When a report is made without the participation of an identified survivor, the investigation team at EDC headquarters will identify potential survivors without causing additional harm. Survivor support assistance will be provided once survivors are identified. If a survivor chooses to remain anonymous, the options for referral support or funded support may be limited, although general information on referral services may still be provided.

Three types of immediate survivor support assistance services may include:

1. **Immediate material care:** Direct and/or funding support to provide temporary needs, such as trauma-informed medical care, food, clothing, or emergency safe shelter as needed and deemed necessary.
2. **Psychosocial support:** Referrals and funding support to obtain appropriate psychosocial services through a local counseling organization. For example, EDC’s employees have access to such counseling through a third-party provider, and project funds will be used for such support. Comparable services or alternative culturally sensitive psychosocial support will be made available to survivors through appropriate local service providers.
3. **Legal and advocacy support:** Support to obtain victim advocacy services or legal counseling to make an informed decision about whether to pursue legal recourse. (Note: EDC’s General Counsel cannot directly represent a survivor as it poses an inherent conflict of interest.)

Sanction and Disciplinary Action

As necessary, the accused EDC employee or associated personnel may be immediately suspended from EDC activities until an investigation can be conducted. This action is to protect the survivor from

further potential harm. However, there may be instances where placing the alleged perpetrator on suspension may create additional risk or harm to the survivor. This determination will then be made by EDC's Human Resources Department in close consultation with the Office of Legal Affairs and Global Security.

If a safeguarding violation allegation is substantiated, disciplinary action, including termination, may be taken. In addition, EDC may report the results of the investigation to funders, as appropriate or required.

Use of this policy for malicious purposes or to conceal prohibited behaviors outlined within this policy will also be subjected to disciplinary action as noted above.

Timeline for Investigatory Action

EDC's Office of Legal Affairs will initiate an investigation within 2 working days (to the extent possible) of receiving a report and will have an initial outcome of the investigation within 20 working days. This timeline may be modified based on the unique needs of each investigation.

V. Confidentiality

EDC employees and associated personnel shall ensure all information related to a report of suspected or known abuse, exploitation, or neglect is kept confidential and only shared with the appropriate employees as deemed necessary (i.e., General Counsel or Human Resources representative). No information, especially information that could identify the survivor, shall be shared with the media (including press or any form of social media), other EDC personnel, or the survivor's family or friends. EDC shall maintain the confidentiality of all information, records, reports, correspondence, and similar documents relating to the incident to the extent possible.

VI. Recordkeeping

EDC will file and retain all written records of any incident of abuse and/or exploitation in accordance with applicable law. Written records should include, but not be limited to, the following information:

- Date of the report
- Date of the alleged abuse
- Name, address, and contact information of the survivor and if applicable their parent(s), legal guardian(s), or caregivers
- Name of the individual who reported the incident
- Name and contact information of the governmental contact to whom the report was made

VII. Works Consulted

United Nations. (2018, March 21). *United Nations protocol on allegations of sexual exploitation and abuse involving implementing partners.*

https://www.un.org/en/pdfs/UN%20Protocol%20on%20SEA%20Allegations%20involving%20Implementing%20Partners%20-%20English_Final.pdf

United Nations, Secretariat. (2003, October 9). *Secretary-General's bulletin: Special measures for protection from sexual exploitation and abuse* (ST/SGB/2003/13).

<https://www.unhcr.org/us/media/secretary-generals-bulletin-special-measures-protection-sexual-exploitation-and-sexual-abuse>

Annex 1 – Core Principles

The six Core Principles featured in the United Nation’s *Secretary-General’s Bulletin: Special Measures for Protection from Sexual Exploitation and Sexual Abuse*² (ST/SGB/2003/13) follow:

1. Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age is not a defense.
3. Exchange of money, employment, goods, or services for sex—including sexual favours or other forms of humiliating, degrading, or exploitative behaviour—is prohibited. This includes situations where assistance meant for beneficiaries is used in exchange.
4. Any sexual relationship between those providing humanitarian assistance and protection and a person benefitting from such assistance—and involving improper use of rank or position—is prohibited. These relationships undermine credibility and integrity.
5. Where a humanitarian worker develops concerns or suspicions regarding sexual exploitation or abuse by a colleague (even outside their own agency), they must report such concerns via established agency reporting mechanisms.
6. Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse, and promotes implementation of their code of conduct. Managers at all levels carry particular responsibility for supporting and developing systems that uphold this environment.

² United Nations, Secretariat. (2003, October 9). *Secretary-General’s bulletin: Special measures for protection from sexual exploitation and abuse* (ST/SGB/2003/13). <https://www.unhcr.org/us/media/secretary-generals-bulletin-special-measures-protection-sexual-exploitation-and-sexual-abuse>

Annex 2 – Definitions

A note regarding the use of standard definitions:

The definitions below reflect common terminology across the safeguarding, development and humanitarian sectors to promote clarity, consistency, and alignment with donor expectations and applicable laws. While some wording may be similar to that used by other organizations, it reflects EDC’s commitment to following established safeguarding standards while maintaining its own policy.

Abuse: Infliction of injury, unreasonable confinement, intimidation, or cruel punishment that causes or is likely to cause physical harm or pain or mental anguish; sexual abuse or sexual exploitation; financial exploitation; or the intentional, knowing, or reckless deprivation of essential needs. “Abuse” includes both acts of commission and omission.

Abuse symptoms: Symptoms that may indicate abuse can include, but are not limited to, the following:

Physical signs, such as:

- Lacerations and bruises
- Nightmares
- Irritation, pain, or injury in the genital area
- Difficulty with urination
- Discomfort when sitting
- Torn or bloody underclothing
- Venereal disease

Behavioral signs, such as:

- Anxiety when approaching EDC’s premises or a room used for EDC projects
- Nervous or hostile behavior toward adults
- Sexual self-consciousness
- Acting out of sexual behavior
- Withdrawal from activities and friends

Verbal signs, such as the following statements:

- I don’t like (insert name).
- (Insert name) does things to me when we are alone.
- I don’t like to be alone with (insert name).
- (Insert name) fooled around with me.

Age groups:

- **Adult** is defined as any person who is 25 years of age or older.
- **Youth** is defined as any person who is 18–24 years of age.

- **Child (or children)** is defined as any person who is younger than 18 years old—unless the national laws in the country in which EDC is carrying out the children’s program defines a lower age of majority.

Aid worker: Any individual who may be working for or acting on behalf of a humanitarian and development organization, whether on a voluntary or paid basis. “Aid worker” includes all international and national employees, as well as all employees or individuals who have entered into a contract or agreement with these organizations, including interns, volunteers, international and local consultants, and contractors as well as day laborers.

At-risk youth and adult: Sometimes also referred to as “vulnerable adult.” Those individuals over 18 years old who are unable to receive and evaluate information or to make or communicate informed decisions to such an extent that the adult lacks the ability to (1) meet the essential requirements for physical health, (2) protect themselves from harm or exploitation, or (3) perform self-care, even with reasonably available appropriate technological assistance. A vulnerable adult can also be someone who is deemed to be at risk due to their race, color, religion, sex, sexual orientation, gender identity and expression, ancestry, national origin, age, marital status, genetic information, pregnancy, pregnancy disability, or mental or physical disability or because they are a protected veteran or any other characteristic protected by federal, state or local law, or as a result of disasters and conflicts.

Best interests of the child: The principle of best interest applies to all actions concerning children and requires active measures to protect their rights. These measures should (1) promote children’s survival, growth, and well-being and (2) support and assist parents, legal guardians, or other caregivers to realize children’s rights. These measures include child participation to ensure that the opinions of children are heard in matters affecting them.

Best interests of youth: The principle of best interests applies to all actions concerning youth and requires active measures to protect their rights. These measures should promote (1) youth safety; (2) youth physical, emotional, and developmental needs; and (3) youth well-being. These measures should also support and assist youth to realize youth rights, including youth participation to ensure that the opinions of youth are heard in matters affecting them.

Child exploitation and abuse involve one or more of the following:

- **Child sexual abuse:** The involvement of a child in a sexual activity that they do not fully comprehend or give informed consent to or for which they are not developmentally prepared and cannot give consent or that violates the laws or social taboos of society. It is evidenced by an activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust, or power, and the activity is intended to gratify or satisfy the needs of the other person. It may include, but is not limited to, the inducement or coercion of a child to engage in any unlawful sexual activity, the exploitative use of a child in prostitution or other lawful sexual practices, or the exploitative use of pornographic performances and materials.
- **Emotional abuse:** Emotional abuse is inappropriate verbal or symbolic acts toward a child or a pattern of failure over time to provide a child with adequate nonphysical nurture and

emotional availability. Such acts have a high probability of damaging a child’s self-esteem or social competence.

- **Grooming:** Generally refers to behavior that makes it easier for an offender to procure a child for sexual activity. It often involves the act of building the trust of children and/or their caregivers to gain access to the children for the purpose of sexually abusing them. For example, grooming includes encouraging romantic feelings or exposing the child to sexual concepts through pornography.
- **Online grooming:** The act of sending an electronic message with indecent content to a recipient whom the sender believes to be less than 18 years of age, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including, but not necessarily, the sender.
- **Neglect:** Failure to provide a child (where they can do so) with conditions that are culturally accepted as being essential for their physical and emotional development and well-being.
- **Physical abuse:** Physical abuse occurs when a person purposefully injures or threatens to injure a child or young person. This abuse may take the form of slapping, punching, shaking, kicking, burning, shoving, or grabbing. The injury may take the form of bruises, cuts, burns, or fractures.

Child and youth protection: The responsibility, actions, and measures taken to prevent and respond to abuse, exploitation, and violence against children and youth.

EDC employees and associated personnel: The term “EDC employees and associated personnel” includes all employees of EDC and EDC project offices. The term also includes board members, volunteers, interns, and international and local consultants, in addition to individual and corporate contractors of these entities and related personnel. This includes non-EDC entities and their employees and individuals who have entered into partnerships, subgrants, or subrecipient agreements with EDC regardless of the funding source.

Emotional abuse: Acts or omissions that cause or could cause serious behavioral, cognitive, emotional, or mental disorders. Emotional maltreatment may include verbal threats, social isolation, intimidation, exploitation, terrorizing, or routinely making unreasonable demands.

Gender-based violence (GBV): An umbrella term for any harmful act that is perpetrated against a person’s will and that is based on socially ascribed gender differences between males and females.

Harm: Psychological, physical, and any other infringement of an individual’s rights.

Misconduct: An umbrella term that captures a wide range of behavior that is inappropriate. Misconduct may include, but is not limited to, sexual exploitation and abuse, trafficking in persons, child exploitation, neglect, fraud, waste, and abuse.

Partner: An entity to which EDC has entrusted the implementation of a program and/or project specified in a signed document, along with the assumption of responsibility and accountability for the effective use of resources and the delivery of outputs. Implementing partners’ subcontractors are subsumed within this definition.

Personally identifiable information (PII): Information that could be used to identify a survivor following an incident. Submission of PII can be used to re-identify an individual and therefore increases the risk to those individuals involved in an allegation. When submitting incident information to donors, funders, or sponsors, EDC will take steps to not share any PII unless specifically requested.

Physical abuse: The deliberate application of force that results in or may result in non-accidental harm or injury. Physical abuse may include beating, shaking, choking, biting, kicking, burning, poisoning, or any other harmful or dangerous use of force or restraint.

Prevention from sexual exploitation and abuse (PSEA): This term is used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by employees or associated personnel. The term derives from the United Nations *Secretary-General's Bulletin: Special Measures for Protection from Sexual Exploitation and Abuse*³ (ST/SGB/2003/13).

Project participants: Someone who directly receives goods or services from EDC's project or has contact with EDC personnel, suppliers, or supplier personnel in connection with or because of EDC's business activities.

Psychological harm: Emotional or psychological abuse, including, but not limited to, humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement, and isolation.

Retaliation: Taking an action that might deter a reasonable person from participating in an activity protected by antidiscrimination and/or whistleblower laws. A protected activity includes complaining about discriminatory or harassing behavior; disclosing or reporting violations of law, rule, procedure, fraud, waste, or abuse; and participating in discrimination or whistleblower proceedings (such as an investigation or a lawsuit). Retaliatory actions are not limited to formal personnel actions, such as termination, demotion, non-promotion, or non-selection.

Safeguarding: Taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse, and harassment, from occurring; to protect people, especially at-risk or vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

Sexual abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. When carried out against a child by an adult, such conduct is considered sexual abuse even in the absence of force or unequal or coercive conditions. Sexual abuse includes fondling, intercourse, incest, sodomy, exhibitionism, or commercial exploitation through prostitution or the production of pornographic materials. Sexual abuse may include, but is not limited to, permitting, encouraging, or requiring a person to engage in any of the following activities:

- Using or engaging in sexually provocative language, acts, or conduct

³ United Nations, Secretariat. (2003, October 9). *Secretary-General's bulletin: Special measures for protection from sexual exploitation and abuse* (ST/SGB/2003/13). <https://www.unhcr.org/us/media/secretary-generals-bulletin-special-measures-protection-sexual-exploitation-and-sexual-abuse>

- Rough-housing or engaging in conduct that involves physical contact and which is sexually suggestive in nature
- Kissing, fondling, caressing, patting, or pinching
- Engaging in sexual intercourse or other sexual conduct designed to sexually stimulate the person (adult or youth) or the person in question or both
- Using sexual remarks, jokes, innuendo, or taunting about an individual’s body or sexual orientation
- Speaking or writing invitations, requests, or sexually suggestive remarks
- Displaying pornographic or sexually suggestive material
- Behaving in a sexual nature for the stimulation, gratification, profit, or self-interest of a person who is in a position of trust or authority or with whom the person is in a relationship of dependency
- Using someone regardless of gender and/or sexual orientation for prostitution or production of material of a pornographic nature

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.

Survivor: The person who has been abused or exploited. The term “survivor” is often used in preference to “victim” as it implies strength, resilience, and the capacity to survive. However, it is the individual’s choice of how they wish to identify themselves.

Vulnerable adult: Sometimes referred to as an “at-risk adult.” A “vulnerable adult” means a person 18 years of age or older who is unable to meet their own needs or to seek help without assistance due to incapacity, mental illness, mental deficiency, physical illness or disability, advanced age, chronic use of drugs, chronic intoxication, fraud, confinement, or disappearance.

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