

**HIVOS**  
**SAFEGUARDING**  
**POLICY**

*Safeguarding  
means promoting and  
protecting people's  
health, well-being  
and human rights,  
and enabling them  
to live free of  
harm, exploitation  
and abuse*

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# INTRODUCTION

Hivos believes that human life in its many forms is valuable, and that people are filled with potential. Living a life in freedom and dignity, with respect for each other and the planet, leads to greater individual well-being and fair, vibrant societies.

We cooperate with various partners across four continents. These can be artists, lawyers, or hackers, but also governments, energy companies and knowledge institutions. The projects we develop and support can be large scale and long term, but also small and experimental – a farmer’s cooperative, or a breeding ground for internet entrepreneurs, for example. They can also be in the form of a campaign against corruption, a partnership with a coffee trader or a safe haven for a LGTB+ activist. What our partners have in common is that they seek to bring about social change through innovative ways. We recognize that same drive in many people across the world.

We are aware of the vulnerability of many of our beneficiaries and the importance of the behavior of our own staff and our partners. This Safeguarding Policy provides clear definitions, sets standards across the organization, and gives clear guidance on how to apply and implement the policy throughout the organization and in relation to partner organizations.

## WHAT IS SAFEGUARDING

For Hivos safeguarding means promoting and protecting people’s health, well-being and human rights, and enabling them to live free of harm, exploitation and abuse. A safeguarding approach means identifying and minimizing the risk of harm to children and (vulnerable) adults such as disabled people and LGTB+, from staff, representatives and partners. In addition, safeguarding is increasingly becoming best practice to think about how we safeguard everyone in our organization itself at all times, including protecting staff from inappropriate behavior such as bullying and harassment.

Safeguarding entails for us a wide potential range of policies, procedures and activities seeking to address the welfare of staff, partner organizations and those we come into contact with such as children and (vulnerable) adults. It focuses on developing standards and mitigation measures to target and reduce residual risk.

This policy consist of:

1. Commitment and purpose of Safeguarding: statement of our commitment, registration of safeguarding issues, criminal background and reference check, training and sharing with downstream partners.
2. Whistle-blowing & external complaints mechanisms: policy and procedure, protection and records.
3. HR Recruitment and selection: the level of safeguarding risk in a job role, security and background check, experience of interviewers and specific questions on safeguarding, integrity policy and mechanisms on how to deal with inappropriate behavior.
4. Risk Management: a framework capturing risk appetite and risk categories, registration for all programs, defining risk-owners within our organization and sharing with downstream partners.
5. Integrity Policy & Code of Conduct: including providing information and training. Elements of child protection are included in the code of conduct.
6. Governance & Accountability: organogram illustrating the implementation of the safeguarding policy and procedures, for example appointing a safeguarding manager and safeguarding focal persons, annual reports, access to helpline and complaints procedure suitable for all (including children) and assuring our downstream partners are reviewed on risk management, whistle-blowing and safeguarding.
7. Security: Hivos is aware of its responsibility for the safety and security of its staff. It wants to be explicit so as to make visible how it exercises these responsibilities. Hivos therefore developed a Security Policy which consist of an integrated set of documents that helps its staff to perform the security related tasks.

## PARTOS

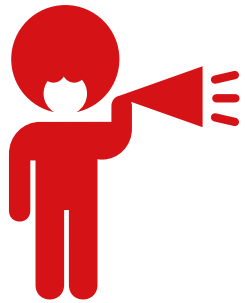
Hivos is a member of Partos, the Dutch membership body for organizations working in international development. All members sign their code of conduct and a quality statement (ISO9001-Partos). Hivos is active in the committee of Partos to develop a common policy on integrity. This includes a report system (central whistle-blower service), the investigation procedure and sanctions. Hivos will participate in a joint complaints mechanism in our areas of operation. We endorse that it would be better to engage an independent external authority in case of external complaints.

# 1.

## COMMITMENT AND PURPOSE OF SAFEGUARDING

The purpose of this policy is to ensure that the activities of Hivos are implemented in a safe and protective environment where harm, exploitation and abuse are effectively prevented as far as reasonably possible, and responded to effectively.

# OUR CORE VALUES



## FREEDOM & DIGNITY

Every human being has the right to live in freedom and dignity. People should have the freedom to believe what they want, voice their opinions, and challenge and influence the established order.

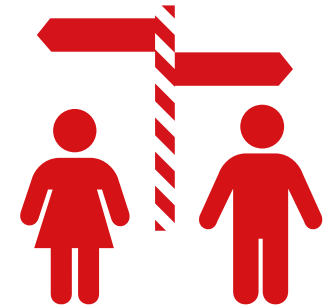
## SUSTAINABLE USE OF OUR PLANET'S RESOURCES

We only have one planet. It offers vast riches, but they are not limitless and are already seriously degraded. For current and future generations to be able to prosper, sustainable use of the earth's resources is paramount. This implies moving beyond merely reducing our negative environmental impact by actively restoring what has been degraded and favouring biodiversity.



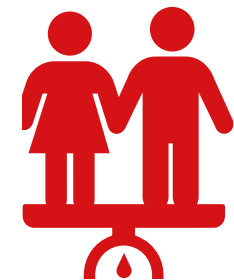
## SELF-DETERMINATION & DIVERSITY

People should be able to make choices and decisions based on their own preferences and interests, regardless of their sexual orientation, ethnicity or religion. Each individual is unique, and individual differences lead to diversity.



## EQUALITY & SOCIAL JUSTICE

We are not the same, but we are equal. We should be treated as such, and this should be reflected in the way our social and legal systems work.



## RESPONSIBLE CITIZENSHIP

Citizens have rights as well as duties. Taking care of those around us and living life without damaging others or our planet, should be a given.



# Hivos believes in people's capabilities

Hivos is therefore also committed to the six key principles that should underpin all safeguarding functions, actions and decisions as set out by the UK care Act 2014:

1. Empowerment: people being supported and encouraged to make their own decisions and informed consent.
2. Prevention: It is better to take action before harm occurs.
3. Proportionality: The least intrusive response appropriate to the risk presented.
4. Protection: Support and representation for those in greatest need.
5. Partnership: local solutions through services working with their communities who have a part to play in preventing, detecting and reporting neglect and abuse.
6. Accountability: accountability and transparency in delivering safeguarding.

This policy has three specific objectives:

1. Keeping our beneficiaries, including both children and adults, and our staff safe.
2. Ensuring the reputation of Hivos, including guarding our representatives and staff from false allegations or from operating within an unclear framework.
3. Ensuring the highest standards of behavior from representatives and staff and minimizing the risk of abusers entering the organization.

Hivos has a clear Zero Tolerance policy on bullying, harassment and sexual exploitation, fraud and abuse of power. Our Integrity policy states:

- Every employee shall conduct him/herself with courtesy, respect and integrity towards all persons in the course of doing his/her work.
- No employee may discriminate against any other person.
- No employee may abuse or deliberately intimidate any other person.
- No employee may make sexual advances where he/she knows or ought to know that the solicitation is unwelcome or in any other way sexual harass another person.
- Aggression and violence are not tolerated.
- Hivos staff must avoid actions or behavior with children which may constitute poor practice or potentially abusive behavior.

As for our partners, Hivos Social Responsibility Policy states: when we start a relationship with a partner we communicate what Hivos expects from the partner with regard to social responsibility. Sexual harassment and corruption are not tolerated, allegations should be discussed and inadequate reactions will result in ending the relationship with the partner. Also our Standard Purchase Conditions mention a zero tolerance approach towards discrimination and sexual harassment.

For the private sector The Guiding Principles for Companies states: ensure the health, safety and well-being of all women and men worker and establish a zero-tolerance policy towards all forms of violence at work, including verbal and/or physical abuse and prevent sexual harassment. Hivos especially mentions to partners and suppliers we do not tolerate the use of child labor, this also could lead to ending the relationship with the partner.

Finally our General Terms and Conditions clearly states Hivos has the right to terminate contracts without giving notice or compensations if the implementing organization does not comply its obligation towards Hivos. Specifically in case of:

- Child labor
- Tolerating discrimination or sexual harassment
- Supporting discrimination on the basis of race, religion, national origin, caste, color, sex, age, veteran status, sexual orientation or disability.

Annexed to this this safeguarding policy are amongst others: The Hivos General Terms and Conditions, our Whistle-blower Facility and our Integrity Policy.

# 2.

## WHISTLE- BLOWING

At the bottom of our website(s) you find a link to our Whistle-blower Facility.



Hivos employees, implementing organizations, beneficiaries and service providers can contact our external whistle-blower hotline at SeeHearSpeakUp [www.seehearspeakup.co.uk](http://www.seehearspeakup.co.uk) to report suspected abuse or irregularities related to Hivos or Hivos funding and projects, occurring within the Hivos organization and also those involving implementing organizations and service providers. Informants have a choice to declare their identity, which will be protected, or to remain anonymous. Hivos will facilitate steps that guarantee the anonymity of the whistle-blower.

SeeHearSpeakUp is an external and independent Whistle-blowing service that operates 24 hours a day, 365 days a year enabling our employees and external parties to report matters without fear on fraud, malpractice, misconduct or mismanagement in the workplace. They are also helping us adhere to the Modern Slavery Act by assisting in the fight against forced labor, trafficking and exploitation.

SeeHearSpeakUp is a global service that provides free phone lines in different countries and Translation-services in 200 different languages. Their staff is qualified and experienced fraud/financial investigators and chartered/forensic accountants. They are all trained in interview techniques in order to extract the best and relevant details from those providing the information.

SeeHearSpeakUp is a service line of Anderson Anderson & Brown LLP.

The Hivos Whistle-blower Facility is designed to combat acts of fraud, corruption and integrity issues including sexual harassment related to Hivos, implementing organizations and service providers (and their respective employees). All implementing organizations are obligated to inform their Staff and service providers regarding the Hivos whistle-blower procedure, this will be attained by publicly displaying the Hivos whistle-blower policy (and contact address) or other suitable means.

## HIVOS WHISTLE-BLOWER PROCEDURE

The Hivos Whistle-blower Facility is administered by the Secretary to the Board of Hivos Global Office who will sanitize the reports to ensure that they exclude the name of the informant or any other information which identifies the informant before they are forwarded for further action. If the report implicates a Hivos employee, this will be notified to the respective line manager and Hivos Executive Board of Directors.

If the report concerns (individual) inappropriate behavior, the (external) confidential counselor will be notified. The confidential counselor will take the necessary steps as described in our complaints procedure. In case of fraud, the Controller of Hivos will be notified.

The Inquiry Committee or investigating mission confers and decides on the recommendation in a closed meeting. During the investigations and afterwards Hivos commits to protect whistle-blowers against retaliation from an affected party in the event that a whistle-blower is known or suspected to be known.

If an employee, implementing organization, beneficiary or service provider feels that his/her report has not been addressed or the reported anomalies continue to prevail, he/she can escalate the report to the Hivos Executive Director or the Hivos Supervisory Board. This procedure will also apply in cases where a reported anomaly involves or implicates a Director Regional Office or the Controller of Hivos who is responsible for handling whistle-blower reports.

Hivos shall evaluate the report and institute a preliminary inquiry within a period of seven days of receipt. After a period of no more than two weeks the investigator makes a recommendation to the Secretary of the Board. There are two possible outcomes for this recommendation: the report is inadmissible (therefore Hivos unable to pursue the report as it is not sufficiently compelling or because the preliminary inquiry has not shown any abuse) or the report is admissible therefore subject to further investigation.

When reports are admissible, Hivos will establish an ad hoc Inquiry Committee or appoint an appropriately experienced external mission (or Auditor) to investigate the report of abuse further and reports on its findings to the Controller within a period of eight weeks. During the inquiry or investigation the reporting person is notified of the progress of the inquiry, unless the reporting person indicates not to require this or disadvantageous for the reporting person or the inquiry, or other valid reasons.

*Hivos  
believes  
in people's  
competency*

# 3.

## EXTERNAL COMPLAINTS

The Hivos Complaints procedure is designed to combat any inappropriate behavior including sexual harassment or any other wrongdoing related to Hivos, implementing organizations and service providers.

Anyone outside Hivos who has a complaint against Hivos can put the complaint through [complaints@hivos.org](mailto:complaints@hivos.org). This mail address is administered by the Secretary of the Board. If the complaint concerns inappropriate behavior, sexual harassment or otherwise, it will be forwarded to the external confidential counselor.

The Hivos Complaints procedure is designed to combat any inappropriate behavior including sexual harassment or any other wrongdoing related to Hivos, implementing organizations and service providers (and their respective employees). All implementing organizations are obligated to inform their Staff and service providers regarding the Hivos Complaints procedure, this will be attained by publicly displaying the Hivos Complaints Procedure (and contact address) or other suitable means.

Besides an internal confidential counselor, every region provides an external confidential counselor. The external confidential counselor will pick up a case if the complainant is not working for Hivos.

An external complainant is contacted by this external confidential counselor directly after Hivos received his/her complaint. The responsibilities for this role are comparable to the role of the internal confidential counselor but should include:

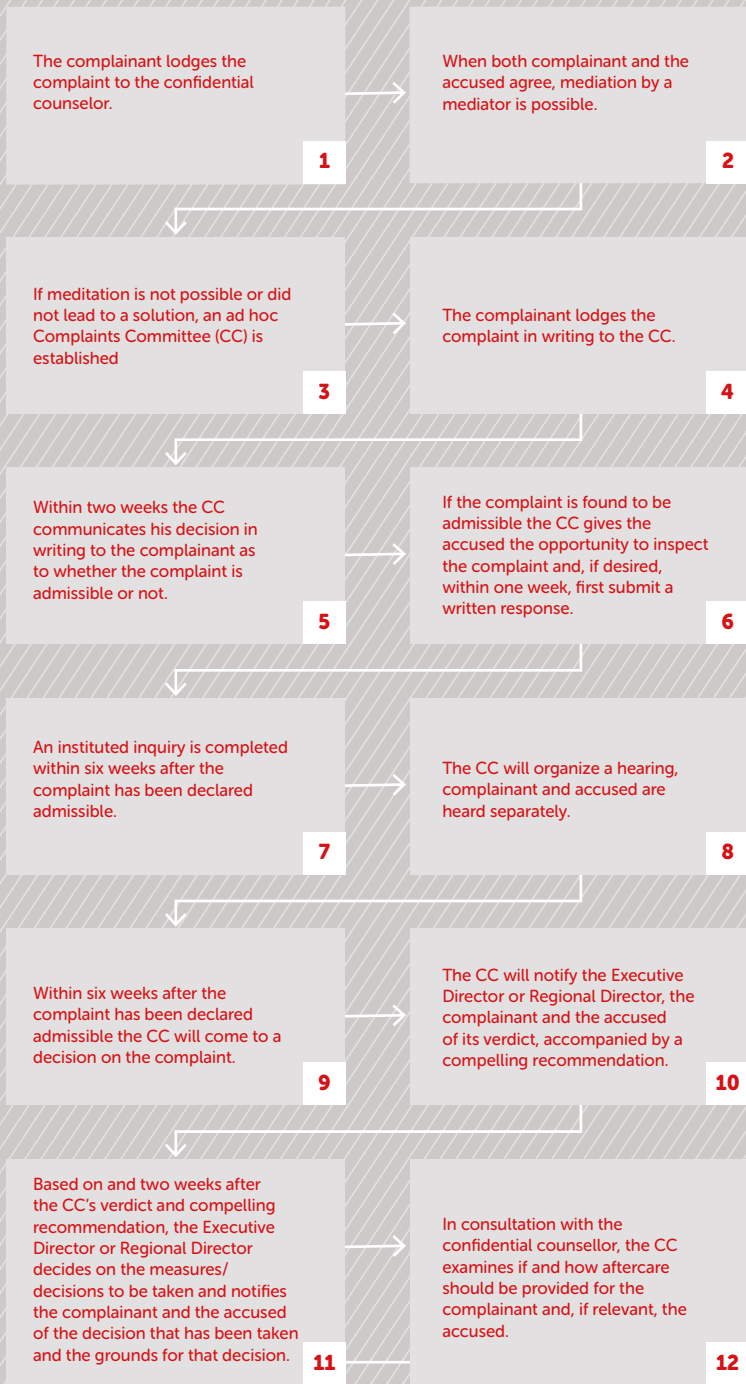
- checking if the complainant is in need of mental or physical support, and if so organize this;
- advice on how to start a complaints procedure;
- guidance in the complaints procedure.

## INFORMAL COMPLAINTS MECHANISM

- 1) The complainant lodges the complaint to the confidential counselor. If desired by the complainant the confidential counselor acts as a point of contact and offers direct advice on 'first-aid' support (medical, psychological, legal or otherwise) for the complainant to the Board/Regional Director
- 2) If desired by complainant, the confidential counselor and complainant can investigate whether the complaint can be resolved between the complainant and the accused, through dialogue/mediation and/or through referral to independent experts such as psychologists, psychotherapists etc. The independent expert can be selected either by the complainant her/himself or in consultation with the confidential counselor/HR.
- 3) When both the complainant and the accused have reached agreement on a dialogue to resolve the situation, mediation by an independent mediator or referral to external independent experts is possible. With the complainant's consent, the confidential counselor notifies the Executive or Regional Director of the request for investigation, mediation, psychological or legal support.

## FORMAL COMPLAINTS MECHANISM

The internal formal complaints mechanism regarding inappropriate behavior is described in the "Hivos Integrity Policy". This procedure will also be followed in cases of sexual harassment and misconduct and gendered discrimination whereby the role of a Complaints Committee will be taken over by a Gender Complaint Committee. The formal internal complaint procedure will be established in every office where Hivos works and should be applicable to local laws and regulations. (See the diagram with the procedure on the next page).



# 4

## HUMAN RESOURCES RECRUITMENT AND SELECTION

Hivos complies with all legal regulations on hiring new employees, such as checking the identity and privacy rules. Included in the standard Employment Contract is: "The Employee hereby declares that he/she has received from the Employer a digital copy of the Integrity Policy."

Our Integrity Policy includes a statement on inappropriate behavior. Also the integrity policy is included in our Performance Management Cycle (PMC). Every year integrity is subject during the meeting where employee and manager make the targets and plans for the coming year. Employees must put a separate signature for this on the PMC form.

Due to our Integral Personnel Management Policy, tasks in hiring new employees are assigned to managers, off course with support of HR. Our safeguarding policies on hiring new employees include:

1. It is obligatory for new staff in the Netherlands to obtain a "Verklaring Omtrent Gedrag (VOG)" (Certificate of Conduct for Natural Persons). This is a document by which the Dutch State Secretary for Justice and Security declares that the applicant did not commit any criminal offenses that are relevant to the performance of his or her duties. In the employment contract is stated that not receiving a VOG within two months after starting working for Hivos, will lead to the termination of the employment contract.
2. In our regional offices new personnel should be able to obtain a police clearance before the can be hired. Excluded is personnel who are unable to obtain a police clearance because they have a criminal record due to their activities on LGTB+ and Human Rights. This will be the discretion of the Regional Director, upon advice from the global HR manager.
3. New employees sign a copy of the Code of Conduct of Hivos. This copy is put in their personnel file.
4. Our vacancies include a paragraph on our procedure on obtaining a VOG, reference checks and that we may check Social Media (unless applicants states they do not wish us to do so).
5. The hiring manager and/or HR asks and checks references before hiring new staff. This will also include checking the correctness of the CV of the new employee. Management is trained by HR on which questions may be asked and how to check given information.
6. Management is trained in asking the right questions to candidates concerning previous behavior in other jobs and will also explain Hivos policy on safeguarding and emphasize the importance of this policy. A budget has been made available for this.

# 5.

## RISK MANAGEMENT

Safeguarding is included in how Hivos addresses risk management. The Hivos risk management system is linked to the strategy of the organization, i.e. the identified risks may affect the strategic objectives of the organization and require an answer in how we want to achieve our objectives. Risk assessment and risk management are therefore crucial instruments to the way we seek to implement our mission and vision.

Mitigation strategies aim at risks that are somehow within the span of control of the organization. Risks that are outside the span of control are monitored, but the energy of the management of the organization goes towards those risks that can be managed. Risks at operational level are no less real, but are very much within the span of control of the organization and are dealt with at the appropriate level. Risk assessment and risk management are best done at the lowest possible level, which is why Hivos risk assessments are differentiated per region, theme and – if applicable – per program.

Hivos has identified five categories of risks, these are environmental, organization & strategic level risks; project management cycle risks; grants management cycle risks; financial management cycle risks and human resources and operational cycle risks. The first category is related to the overall strategy of the organization (therefore covered through business & strategic plans) while the other four categories are related to the main operational cycles within the organization. Hivos defines the key risks related to each cycle, evaluates the risks, and develops mitigation measures (policies, procedures, control checks) for treating or reducing the identified risks.

Actual mitigation of risks is attained through the implementation of the various risk mitigation policies and controls, actively monitored through regular review of risk registers and through internal audits.

Also for our partners our General Terms and Conditions states in the article about Risk Management they are responsible for all security arrangements. These include health, safety of any person employed or otherwise engaged, including those employed or engaged by any other implementing parties contracted by the implementing organization. Implementing organizations are accountable to report on risk by managing all risks with a risk register.

Assessments of risks to children and (vulnerable) adults are included as a specific part of the project development or inception phase of every project.

# 6.

## INTEGRITY POLICY

Hivos aims for the highest possible integrity in its contact with partners, suppliers, clients, among Hivos staff and in relation to business property. The focal points of staff policy, i.e. justice, legal security, openness and clarity, individual responsibility and room for initiative, diversity and creativity, also serve as a point of departure for the Integrity Policy.

Integrity cannot be arranged just by drawing up a number of rules of conduct. Attitude and “wanting to do things properly” are also important aspects of integrity. Integrity can be described as having a hard side and a soft side. The hard side consists of regulations, both internal and external, and the soft side is the organizational culture at Hivos. Integrity in an organization means being open and respectful with one another, avoiding deception and that superiors set good examples through exemplary conduct.

Apart from the contents of the Integrity Policy, Hivos employees are obliged to comply with legal requirements and abide by common social norms and values.

## KEY VALUES

Hivos is guided by humanist values. Together with civil society organizations in developing countries, Hivos contributes to a free, fair and sustainable world. Our vision and mission is a world in which all people are equal and in which there are no boundaries to the development possibilities for people. Hivos trusts in the creativity and capacity of people.

Key humanist values for Hivos are human dignity and self-determination; rejection of dogmatism and authoritarian rule; pluralism and democracy; mutual solidarity; responsible citizenship; respect for people’s cultural and social identity. These values inform the choices we make regarding the way and with whom we conduct our affairs and the way Hivos staff behaves towards each other and the outside world.

At Hivos the Integrity Policy is included in our Performance Management Cycle (PMC). Every year it is a subject during the meeting where employee and manager make the targets and plans for the coming year. Employees must put a separate signature for this on the PMC form.

The Hivos Integrity Policy is integrated in the Induction Program for new employees. Hivos organizes four times a year a special meeting for new employees where values of Hivos are discussed. The Code of Conduct is part of this discussion. Also an induction e-learning module is introduced with several items introduced by colleagues on short videos of which Integrity and Code of Conduct is a separate item.

Integrity is a regular subject in communication towards staff and on our website.

Hivos  
believes  
in people's  
authenticity

*Hivos  
believes  
in people's  
creativity*

# 7.

## CODE OF CONDUCT

The Hivos Code of Conduct applies equally to everyone associated with Hivos.



Our Code of Conduct includes but is not limited to:

- All permanent and temporary members of staff
- Consultants
- Interns
- Volunteers
- Members of the Supervisory Board
- Partner organizations
- Accompanying family members of expat employees
- Third-party contractors

Included in our Code of Conduct are child protection policy statements. There are special behavior issues in working for and with children, for example media and photography.

Hivos acknowledges the duty of care to safeguard and promote the welfare of children and vulnerable adults and is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and requirements.

Hivos recognizes that the welfare and interests of children are paramount in all circumstances. The Hivos Code of Conduct aims to ensure that regardless of age, ability or disability, gender reassignment, race, religion or belief, sex or sexual orientation, socio-economic background, all children

- have a positive and enjoyable experience in a safe and child centered environment;
- are protected from abuse while participating in our activities or outside of the activity.

Hivos acknowledges that some children, including disabled children and young people or those from ethnic minority communities, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare.

The policy and procedures will be widely promoted and are mandatory for everyone involved. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organization.



# GOVERNANCE AND ACCOUNTABILITY

Hivos designates a Safeguarding Manager (SM) at international level and Safeguarding Focal Persons (SFP) in our regional offices. These roles are added to the job descriptions of existing staff.

The SM directly reports to the Executive Board on all issues regarding safeguarding. Responsibilities of the SM are to:

1. Build understanding and capability of Hivos required to implement and manage this policy. This includes direct knowledge and information transfer and accessing appropriate external expertise.
2. Act as the reporting mechanism for any safeguarding concern and use lessons learned from specific incidents to improve the policy and practice.
3. Include the SFP's and Project Officers of all Hivos Programs on safeguarding issues.
4. Draw up an annual report for the Executive Board highlighting safeguarding activities.
5. Revise the Safeguarding Policy if necessary.
6. Audit partners on safeguarding issues. Also support partners if needed on safeguarding issues.
7. Draw up a communication plan on safeguarding for staff, partner organizations and beneficiaries. Also ensure the information on safeguarding on our website is up to date.

Each regional office of Hivos has a SFP who works together with the Regional Director on all safeguarding issues in their region. They are responsible for a regional safeguarding plan. The SFP reports issues to the SM and gives input for the annual report of the SM. Also supports the SM with the communication and audits. The SFP assesses any contextual issues with the safeguarding policy and develops regional specific procedures if relevant. These include guidance for Hivos representatives about our appropriate official reporting procedures in the case of an incident.

A description is made for the specific roles of the SM and SFP. These roles are included in their Performance Management Cycle. SM and SFP get all opportunities from Hivos to train themselves in their role to acquire the necessary skills and knowledge to undertake their activities.



# MEASURES TO IMPLEMENT THE POLICY

The safeguarding policy requires five steps for its implementation.

Five steps for implementation:

1. **Staffing** including the designation and training of a global Safeguarding Manager (SM), as well as Safeguarding Focal Persons (SFP) in each regional office.
2. **Prevention measures** including awareness raising, training of relevant staff, risk analysis, recruitment procedures, induction of staff in the policy and codes of conduct for Hivos representatives and incorporation of the policy into relevant existing systems.
3. **Reporting and responding measures** including steps for alerting and reporting safeguarding concerns, investigation and incident management, duties and responsibilities of assigned managers and safeguarding focal point persons.
4. **Implementing and maintaining the policy**, including training and capacity building of staff and partners, monitoring, reporting and review of the policy.
5. **Budget**, a budget has been made available for training and implementing.

## STAFFING SAFEGUARDING MANAGER (SM) AND SAFEGUARDING FOCAL PERSONS (SFP)

Hivos will ensure sufficient time is given to the SM and SFPs to acquire the necessary skills and knowledge and to undertake the above activities. Line managers will recognize the priority of SFP roles in incident reporting and response when an incident occurs and the dual reporting line required for this area of work.

## PREVENTION

### STAFF RECRUITMENT

All recruitment of staff will include a full induction to the safeguarding policy and code of conduct, including procedures to follow should any safeguarding concern arise.

### AWARENESS

Hivos will designate staff with the responsibility of SM and SFP who will build internal awareness and supporting relevant capacity development of the organization in safeguarding. All Hivos representatives and partner organizations will be duly notified of the Safeguarding Policy and be made aware of how they will be expected to comply with it. The policy will be translated into the appropriate national languages where Hivos operates. It will be the responsibility of all Hivos staff to share the policy and approach as relevant to external stakeholders. Hivos will provide necessary training and support to global and country staff and partner organizations to enhance understanding and ensure effective implementation of the policy.

Hivos regional offices will be requested to review and analyze their regional context, and produce a local plan outlining how they will operationalize the policy in their context. Implementation processes may therefore differ from country to country, but in all circumstances, the policy and code of conduct will remain the same. If any situations arise where national legislation conflicts with the policy, the country office must raise and discuss this with the Safeguarding Manager. Each country will develop a country policy schedule, including naming the SFP and country safeguarding reference group.

Hivos will ensure all supporters, donors, sponsors and media representatives involved with Hivos work have access to the Safeguarding Policy through its website and will take appropriate steps to communicate that availability.

**RISK ANALYSIS**

When working with partners, Hivos will endeavor to ensure that the programs it supports are safe for the (vulnerable) adults and children they serve. To ensure that appropriate safeguarding measures have been put in place, Hivos will work with the partner, either during the project development process, or the inception phase, to carry out a safeguarding risk analysis which specifically includes any safeguarding issues and propose actions to mitigate these risks, prior to the activities taking place. Such risk analysis will be an integral part of project proposals, program planning guidelines and partnership assessment tools.

**CODE OF CONDUCT**

All Hivos representatives are required to understand their responsibility to keep adults at risk and children safe, and to sign and abide by the Hivos Code of Conduct, which lists acceptable and unacceptable behavior, primarily designed to safeguard others. It also serves to guard the name and reputation of Hivos and its representatives from false accusations. All staff are responsible for encouraging and promoting the implementation of the Code of Conduct.

The adherence to this code is mandatory for all Hivos representatives. Any violation of the Code of Conduct will result in disciplinary procedures in addition to any relevant legal action. To give maximum protection to beneficiaries, the organization and staff, the Code of Conduct is to be applied both within and outside of working hours.

## REPORTING AND RESPONDING TO INCIDENTS

Hivos will ensure that reporting and incident management procedures to handle safeguarding concerns are in place and effectively used to enable an appropriate and swift investigation of any given case.

Hivos representatives should be properly informed of the reporting and incident management procedures. Any Hivos representative who has a concern or suspicion regarding harm, exploitation or abuse by someone representing another agency must report such concerns to the Safeguarding Manager or designated SFP.

**CONFIDENTIALITY**

All reports and the information they contain will be handled with strictest confidentiality to protect the identity of the individuals concerned, the informer and the accused, both appropriately and in accordance with the relevant national legislation.

**PROCEDURES TO BE FOLLOWED IN THE CASE OF AN INCIDENT**

Agreed procedures to be followed are included in our Whistle-blower Facility.

**CONSEQUENCES OF HARM, EXPLOITATION OR ABUSE**

Any behavior towards children or adults, which results in harm, exploitation or abuse, or the failure to follow the general requirements and specific code of conduct of this policy, is grounds for the following measures:

**- Representatives**

If an employee has been under investigation by Hivos or by official law enforcement authorities for any area of harm, exploitation or abuse as defined under this policy, they will be subject to employee disciplinary procedures. Under these procedures they may be temporarily suspended during the investigation. If an employee is dismissed for proven harm, exploitation or abuse, Hivos will inform the relevant authorities, disclose this to prospective future employers and/or refuse a reference, depending on details.

**- Partner organizations**

Appropriate action will be taken up to and including immediate termination of a partnership or service agreement. In this case, the short or long-term impact on beneficiaries of the termination of a partnership will be considered.

# IMPLEMENTING, MAINTAINING AND REVIEWING THE POLICY

Hivos will integrate safeguarding measures into relevant core internal processes and tools such as program technical guidelines, partner assessments and agreements, training modules, program design, monitoring and accountability systems and recruitment procedures.

Hivos will make sure that proper induction and training in safeguarding will be made available to all staff, permanent and temporary, consultants and volunteers. The SM and SFPs will receive additional training in order to manage their responsibilities for rolling out, managing and coordinating the safeguarding policy and procedures.

Where relevant, Hivos will support partner organizations by including relevant training and technical advice to build capacity in the field of safeguarding, with a particular focus on children and adults with disabilities.

The policy will be monitored on a regular basis by the designated SM and the SFPs. An annual summary report, including all concerns received, will be submitted by the SM to senior management. Any findings requiring a change in policy will be discussed by the Executive Board.

Each Hivos country will develop an annual implementation plan for the policy, including actions to be taken, details of the FSP and country safeguarding reference group and relevant policy amendments adopted.

A full policy review should take place every three years, instigated and led by the SM, to include a review of external changes to safeguarding standards that apply nationally and internationally.

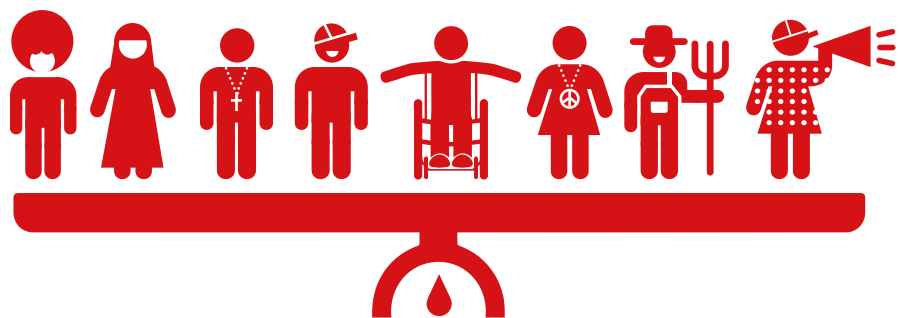
# ANNEXES

1. Integrity Policy (including inappropriate behavior)
2. Policy addressing sexual harassment (annex of the Integrity Policy)
3. Whistle-blower procedure
4. Code of conduct
5. Hivos General Terms and Conditions
6. The guiding principles for companies (private sector)
7. Hivos Standard Purchase Conditions
8. Hivos Corporate Social Responsibility policy
9. Hivos Gender Equality and Diversity Inclusion strategy
10. Partos Code of Conduct (including concept new text)
11. Partos Sector-specific application ISO 9001:2015 (quality standards)

The latest versions of these annexes and the Safeguarding Policy can be found on our website

[www.hivos.org/integrity](http://www.hivos.org/integrity)

# People Unlimited



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