


Policy Name	Safeguarding Policy	Version #	2.0
Owner	Director of Safeguarding	Number of pages	7
Approver	Chief, Finance Services	Effective date	February 16, 2024
Division and Department	Finance Services Safeguarding	Date of previous version	March 1, 2022
Training Required	Yes	Date of last review	February 16, 2024
Signature	 JOSEPH PERERA (Feb 16, 2024 10:23 EST)	Date for next review	February 15, 2026

I. Purpose

Pathfinder has a responsibility to safeguard participants (including children) in our projects from exploitation, sexual abuse, and child neglect perpetrated by a Pathfinder Representative (Board of Directors, officers, employees, volunteers, independent contractors, consultants, sub awardees, and anyone acting on Pathfinder’s behalf). For this policy, Pathfinder representatives could also include interns, visitors, government authorities and donors, who will visit project sites and possibly have contact with project participants on behalf of Pathfinder). It is also the responsibility of Pathfinder to protect its employees, volunteers, interns, independent contractors, and consultants working on behalf of Pathfinder from exploitation and abuse.

This policy embodies Pathfinder’s organizational commitment to protect those defined above and underscores the imperative that all Pathfinder Representatives always comply with this policy. As an organization dedicated to improving the lives of the most vulnerable, this policy reaffirms that commitment by ensuring that Pathfinder, in pursuit of our mission, does no harm to those in our care.

II. Applicability

This Safeguarding Policy applies to the Board of Directors, officers, employees, volunteers, independent contractors, consultants, sub-awardees, and anyone acting on behalf of Pathfinder (“Pathfinder representatives”) and is consistent with USAID’s standard provision for safeguarding. In addition, the Safeguarding policy applies to donors, interns, visitors, and government authorities and others who will have contact with project participants on behalf of Pathfinder. Pathfinder representatives are held to this policy during and outside of working hours.

III. Responsibilities

All Pathfinder representatives are responsible for complying with this policy and the Safeguarding Standards.

of Behavior, located in the documents library of the Safeguarding Compliance tab of the Safeguarding site on iShare, and for:

- Participating in safeguarding trainings as required annually;
- Signing a certification that they will comply with Pathfinder's Safeguarding Standards of Behavior;
- Seeking guidance from the Safeguarding team or their office's Local Safeguarding Officer if they have questions about the *Safeguarding Policy* or their responsibilities; and
- Understanding their obligation to report known or suspected safeguarding violations in accordance with the process and reporting channels described in the *Reporting and Whistleblower Protection Policy*. No one should attempt to investigate a potential or actual violation on their own.

Human Resources staff are responsible for implementing the necessary protective procedures when recruiting new staff and ensuring that training on this policy is built into induction/orientation processes. HR shall collaborate with the Safeguarding team to launch annual training for all staff through Pathfinder's online learning platform and help Local Safeguarding Officers monitor training progress and completion.

Country Directors (CD) and **Project Directors** are accountable for ensuring that safeguarding procedures are implemented at the country and project levels, respectively. **Project Directors** should ensure project budgets support Safeguarding-related activities.

Each Pathfinder **Country Director** is required to appoint a **Local Safeguarding Officer (LSO)**. **Country Directors** or **Project Directors** must also select a **Project Safeguarding Lead (PSL)** for every applicable project.

Local Safeguarding Officers are responsible for coordinating Safeguarding training of all country staff and working closely with the global Safeguarding team and the Country Director to create a Safeguarding culture.

The **Project Safeguarding Leads** are responsible for implementing Safeguarding at the project level, following all Pathfinder policy requirements and donor rules pertaining to safeguarding for their project. They ensure all sub awardees and visitors to the project sites have been trained and/or read and sign the Standards of Behavior. They conduct a Safeguarding risk assessment and create a compliance plan to mitigate risks.

Supervisors/line managers are responsible for ensuring their supervisees (including interns, consultants, Pathfinder staff under an employer of Record (EOR), and sub-awardees) comply with policy and all training requirements.

The **global Safeguarding Department**, under the director, ensures training and support for all staff with designated Safeguarding roles, including LSOs and PSLs. They are also responsible for updating policies, trainings, and other tools, as well as conducting investigations into Safeguarding violations and creating a Safeguarding culture that encourages speaking up about actual or suspected violations of the policy.

The **Presidents and Country Directors** shall reinforce communication to staff about compliance trainings and will be informed of possible Safeguarding compliance violations. Leveraging the organization's management structure will ensure responsiveness and action, if needed.

Grants and Contracts staff in country offices are responsible for including required provisions in any sub awards (including contracts, sub agreements or grants for technical services) for a project. The Grants & Contracts team provides an orientation for sub awardees on the sub award agreement, which includes the Safeguarding Legislative Requirements of the subaward. The global Grants and Contracts team stays abreast of any changes in

US government laws that impact this policy, cascades new information to country teams, and keeps the global Safeguarding Director and global Internal Audit and Compliance Senior Director informed of any changes. For more details about responsibilities for specific roles, please refer to the **Safeguarding Implementation Guide** on the iShare Safeguarding site or contact the Safeguarding Department.

IV. Policy Statement

Pathfinder is committed to ensuring a safe and respectful environment, free from exploitation and abuse, for all project participants, Pathfinder representatives and anyone with whom Pathfinder interacts worldwide, especially children and vulnerable adults. We believe that harassment, exploitation, and abuse, including child abuse, are more likely to be exerted due to inequalities and vulnerabilities, particularly those experienced by women, vulnerable adults, and children. We also recognize that there is unequal power between project participants and Pathfinder representatives, including the people with whom we partner and work. Unequal power could also exist among Pathfinder representatives.

This policy also aims to prevent child abuse, exploitation, or neglect as a result of Pathfinder programs by increasing Pathfinder staff and representatives' awareness of prohibited behaviors and their responsibility to report them. A list of prohibited behaviors can be found in the **Safeguarding Standards of Behavior** on the Safeguarding iShare site.

V. Training Requirements

The following details Pathfinder's Safeguarding trainings and who must take each one:

1. Pathfinder's annual Safeguarding training: This training is available in Pathfinder's online training platform. **Who is required to take:** All Pathfinder staff, regardless of funding source or job grade. New staff take the training as part of orientation/induction and then annually in subsequent years.
2. Training on Safeguarding (for people without online access): This training is led by the Project Safeguarding Leads or the Local Safeguarding officer either in person or over Teams. **Who is required to take:** All relevant Pathfinder representatives (sub awardees, consultants, vendors, interns and volunteers) and anyone without access to Pathfinder's online system.
3. **Safeguarding Matters:** This is an external training that gives a comprehensive overview of Safeguarding work. **Who is required to take:** This is not a required training. It is optional for employees who would like a broader foundation in safeguarding and is available on Pathfinder's online learning platform.
4. Training of Local Safeguarding Officers: This training is given by the Safeguarding Department. **Who is required to take:** new Local Safeguarding Officers and/or as a refresher for all country Safeguarding Officers.

Trainings taken in Pathfinder's online learning platform will keep a record of all participants who complete the training.

VI. Reporting Concerns or Violations

Concerns about possible or actual violations of this policy must be reported promptly, pursuant to Pathfinder's [Reporting and Whistleblower Protection Policy](#). Actual or suspected safeguarding violations must be reported through any of the available reporting channels outlined in the *Reporting Policy*, including the confidential and anonymous EthicsPoint hotline at www.pathfinder.org/ethics, or via safeguarding@pathfinder.org. If Pathfinder representatives have questions regarding what constitutes a safeguarding violation, they should speak with their Local Safeguarding Officer or seek guidance through any of the reporting channels.

Pathfinder is committed to providing a survivor-centered approach to alleged violations of this policy. As such, Safeguarding allegations will be assigned to our investigators who have been trained specifically on investigating sexual exploitation abuse and harassment charges with a survivor-centered approach. In the event that a child is involved, Pathfinder will consider what is in the best interest of the child when responding to the allegation.

VII. References

The following organization-wide Pathfinder policies and resources complement and reinforce Pathfinder's *Safeguarding Policy*:

NB: The "Anti-Discrimination Anti-Harassment" policy, on the iShare Policy Center, might be applicable in cases of workplace harassment and discrimination between Pathfinder staff and representatives.

Policies

- Anti-Discrimination and Anti-Harassment Policy
- Board Reporting Policy
- Background check policy
- Combating Trafficking in Persons Policy
- Conflict of Interest Policy
- Disciplinary Action Policy
- Domestic Violence Policy
- Drug-Free and Alcohol-Free Workplace Policy
- Investigation Policy
- IT User Policy
- Reporting and Whistleblower Protection Policy
- Global Media, Social Media, and Spokesperson Policy

Related resources

- Pathfinder's Code of Conduct
- Safeguarding Implementation Guide
- Safeguarding Standards of Behavior

VIII. Definitions

Abuse: physical, sexual, emotional, economic, or psychological actions or threats of actions that could harm another person. This includes any behaviors that frighten, intimidate, terrorize, manipulate, hurt, humiliate, blame, injure, or wound someone.

Bullying: intentional and aggressive behavior occurring repeatedly against a victim where there is a real or perceived power imbalance, and where the victim feels vulnerable and powerless to defend himself or herself. Unwanted behavior can be physical, including hitting, kicking and the destruction of property; verbal, such as teasing, insults and threats; or relational, through the spreading of rumors and exclusion from a group.

Child: A person under the age of 18, regardless of the age of majority or age of consent locally.

Child abuse, exploitation, or neglect: constitutes any form of physical abuse, emotional abuse, or 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.

Emotional Abuse: undermining a person's sense of self-worth through constant criticism; belittling one's abilities; name-calling or other verbal abuse; damaging a person's relationship with their children; or not letting a person see friends and family.

Exploitation: any actual or attempted use of a position of power or trust to emotionally, physically, or sexually abuse someone. It is also considered exploitation to profit monetarily, socially, or politically from this type of abuse, even if you are not the direct perpetrator.

Pathfinder Representatives: the board of directors, employees, volunteers, independent contractors, consultants, sub awardees, and anyone acting on Pathfinder's behalf. For this policy, Pathfinder representatives could also include interns, visitors, and government authorities and donors, who might visit project sites and possibly have contact with project participants on behalf of Pathfinder.

Project Participants: the individuals and communities that Pathfinder serves.

Physical Abuse: hurting or trying to hurt someone by hitting, kicking, burning, grabbing, pinching, shoving, slapping, hair-pulling, biting, denying medical care, or forcing alcohol and/or drug use, or using other physical force.

Safeguarding: systematic measures to protect the health, well-being and human rights of individuals, which allow people — especially children, young people and vulnerable adults — to live free from exploitation, abuse, and harm.

Sexual Abuse: a sexual act that is committed or attempted by another person without freely given consent of the victim or against someone who is unable to consent or refuse. It includes forced or alcohol/drug facilitated penetration of a victim; forced or alcohol/drug facilitated incidents in which the victim was made to penetrate a perpetrator or someone else; non-physically pressured unwanted penetration; intentional sexual touching; or non-contact acts of a sexual nature. Sexual abuse can also occur when a perpetrator forces or coerces a victim to engage in sexual acts with a third party. All sexual activity with a child (under 18 years of age) is considered sexual abuse.

Sexual Exploitation: any actual or attempted use of a position of power or trust to sexually abuse someone. It is

also considered sexual exploitation to profit monetarily, socially, or politically from this type of abuse, even if you are not the direct perpetrator.

Survivor/Victim: individuals who have experienced or been targeted by abuse, violence, exploitation. The words survivor and victim will be used interchangeably by Pathfinder. Still, individuals may choose themselves whether they are referred to as a survivor or victim.

Survivor-centered response: placing the rights, wishes, needs, safety dignity and well-being of the survivor at the center of all prevention and response measures concerning sexual exploitation and abuse (SEA) and sexual harassment (SH).

Vulnerable Populations: individuals from a marginalized group, including but not limited to, children and young people (individuals under the age of 25), women and girls, LGBTQ and non-binary individuals, people with disabilities, refugees/internally displaced populations, people facing food insecurity, survivors of Gender Based Violence (GBV), people living with HIV, and sex workers. Which populations are considered vulnerable differs by context.

These definitions were adapted from the UN, USAID, and other global resources as follows:

- Centers for Disease Control and Prevention. "Sexual Violence Surveillance: Uniform Definitions and Recommended Data Elements, Version 2.0" https://www.cdc.gov/violenceprevention/pdf/sv_surveillance_definitions-2009-a.pdf
- International Initiative for Impact Evaluation. "3ie Safeguarding Policy" <https://www.3ieimpact.org/sites/default/files/2020-02/3ie-Safeguarding-Policy.pdf>
- United Nations. "Bullying and Cyberbullying" <https://violenceagainstchildren.un.org/content/bullying-and-cyberbullying-0>
- United Nations. "Conduct in Field Missions." <https://conduct.unmissions.org/glossary>
- United Nations. "What is Domestic Abuse" <https://www.un.org/en/coronavirus/what-is-domestic-abuse>
- USAID. "Guidance on Child Safeguarding for Implementing Partners" <https://www.usaid.gov/safeguarding-and-compliance/partners/child-safeguarding/FAQs>

IX. Change Log

Date	Version #	Description of Change	Purpose
December 14, 2023	2.0	Updates reflecting new organizational structure	To align with structure
December 14, 2023	2.0	RACI removed to be included in the <i>Safeguarding Implementation Guide</i>	Reflects more process than policy so better placed in the guide.






Safeguarding Policy

Final Audit Report

2024-02-16

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