



## Near East Foundation Safeguarding Policy

**Area:** Global

**Effective Date:** December 2024

**Administrator:** Human Resources

### 1. Policy Statement

NEF places human dignity and trust at the center of its work. Central to NEF's efforts to impact local communities is its engagement with marginalized communities. At NEF, we also recognize the responsibility we have to similarly promote human dignity and trust within our own organization and maintain a safe and respectful workplace. We recognize the importance of organizational culture and accountability in creating a safe and supportive organization for our staff, our partners and the communities it serves.

At NEF, we believe every individual deserves to live a life free from discrimination, sexual harassment, exploitation and abuse, and that no child should be subjected to abuse of any form. We acknowledge that certain groups are more vulnerable to such mistreatment due to social inequalities especially women, vulnerable adults, and children. We also acknowledge that there is unequal power between NEF Employees and Related Personnel and the people we partner and work with throughout our programs, and also between people within our organization. We expect that power differentials will not be exploited to the advantage of individuals or to the detriment of others.

NEF recognizes its responsibility to protect all people associated with our work, whether they are whom we work with or work for us, and is committed to proactively preventing sexual harassment, exploitation and abuse and child abuse from happening. All reports of such misconduct are treated with utmost seriousness, guided by a survivor-centered approach that prioritizes the needs and wishes of survivors, ensuring they are treated with dignity, respect, and provided with necessary support and privacy.

NEF has a zero-tolerance approach toward sexual harassment, exploitation and abuse, and child abuse. We will fully thoroughly investigate any allegations and take appropriate disciplinary measures as needed, always considering the rights and interests of survivors in line with its survivor-centered approach. At NEF, any form of sexual misconduct perpetrated by its staff, partners, or Related Personnel will not be tolerated under any circumstances.

### 2. Scope of Policy

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

- NEF Employees include all employees of any NEF and affiliates;
- Related Personnel includes board members, volunteers, interns, international and local consultants and visitors, in addition to contractors of these affiliates and Related Personnel. This includes non-NEF affiliates and their employees and individuals who have entered partnership, sub- grant or sub-recipient agreements with NEF, as well as



community volunteers and incentive workers<sup>1</sup>.

The policy applies both during, and outside, normal work hours. Actions taken by NEF Employees and Related Personnel outside of working hours that are seen to contradict this policy will be seen as a violation of this policy.

Further definitions related to this policy are included in Annex 2.

### **3. NEF's Safeguarding Commitments**

#### **Organizational Culture, Leadership and Accountability**

- 3.1 **NEF will make every effort to promote, create and maintain a safe organizational culture** for all people who work for and with NEF, including our partners and the communities where NEF works. It is expected that NEF's leaders will promote NEF's safeguarding values by highlighting the organization's commitment to equity, diversity, and respect for others. NEF will create an environment where it is safe to address sexual harassment, exploitation and abuse, and child abuse.
- 3.2 **NEF will develop organization-specific safeguarding strategies**, with appropriate levels of capacity and allocated resources at all levels of the organization, to prevent and respond to sexual harassment, exploitation and abuse, and child abuse.
- 3.3 **NEF will ensure oversight and accountability** in its safeguarding efforts. We will do this through monitoring and evaluating our safeguarding performance and seeking feedback from NEF Employees and Related Personnel, partners, program participants and communities where NEF operates to assess the effectiveness of our safeguarding measures. We are committed to continuous learning and improvement to prevent and respond to sexual harassment, exploitation and abuse, and child abuse. We will be accountable and transparent in communicating our efforts. All disclosures will adhere to a survivor-centered approach and undergo risk assessment.

#### **People Management**

- 3.4 **NEF will seek to employ staff who are aligned with our vision, mission and values, and, in compliance with applicable laws, prevent known perpetrators of sexual harassment, exploitation and abuse and child abuse from being (re)hired or (re)deployed.** We will incorporate appropriate job responsibilities in leadership, managers and other staff positions. Managers and Human Resource teams will ensure robust recruitment screening processes for all personnel, particularly for personnel who will have any direct or indirect contact with children and/or vulnerable adults.
- 3.5 **NEF will ensure all personnel are aware of our Safeguarding Policy, our expected behaviors and conduct, and how to report wrongdoing** by incorporating NEF's

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<sup>1</sup> Different considerations will arise regarding the enforcement of some of this policy and the principles for volunteers and incentive workers hired from communities with whom we work. While sexual exploitation and abuse and the misuse of development funding will always be prohibited, as expressly set forth in this policy, discretion may need to be used in the application of the Safeguarding Code of Conduct regarding sexual relationships for this category of worker. See Annex 1 NEF's Safeguarding Code of Conduct.



expectations on the prevention of sexual harassment, exploitation and abuse, and child abuse in relevant codes of conduct, new employee orientations, awareness raising training and refresher courses, and through regular internal communications.

### **Partners**

- 3.6 **NEF will promote and require safeguarding with partners.** NEF will ensure adequate safeguarding assessments as part of due diligence processes when considering new and existing partnerships. We will choose our partners based on their commitment to human dignity and trust, their organizational values, and how they safeguard their staff and program participants, as well as on their suitability to deliver the work we require of them. We will ensure that when engaging in partnerships, sub-grant or sub-recipient agreements, these agreements: a) incorporate this policy as an attachment or otherwise implement reasonable due diligence and monitoring procedures of its sub-awards consistent with this policy; b) include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to abide with a Code of Conduct that is pursuant to the standards of this policy; and c) expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against sexual harassment, exploitation and abuse, and child abuse, to investigate and report allegations in a timely manner, or to take corrective actions when sexual harassment, exploitation or abuse, or child abuse has occurred, shall constitute grounds for NEF to terminate such agreements. We will work collaboratively to build capacity in our respective organizations to achieve our safeguarding commitments. We will respect our partners, sub-grantees and sub-recipients and where possible and necessary, support them in having the skills and capacity to fulfill their responsibilities consistent with this policy. For vendors, consultants, independent contractors and the like, NEF may incorporate this policy as an attachment to any written agreement or otherwise develop a summary of the requirements contained in this policy and the provisions noted in this section.
- 3.7 **NEF will collaborate on safeguarding within the sector,** including with communities, other organizations, donors, governments, global civil society networks and local partners, to advance our practices and contribute to wider efforts to prevent and respond to sexual harassment, exploitation and abuse, and child abuse.

### **Embedding Safeguarding in our Work**

- 3.8 **NEF will undertake safeguarding risk assessments** to identify areas of safeguarding and sexual harassment, exploitation, and abuse, and child abuse risks, and document steps that are being taken to remove or reduce these risks.
- 3.9 **NEF will incorporate safeguarding measures into programs and throughout the project cycle.** We will do this through our collaborative program design approach, including with our partners and program participants, at all stages to produce better design, monitoring and evaluation of safeguarding in our programs. We aim to identify and mitigate, or minimize, risks arising from our programs.
- 3.10 **NEF will ensure that multiple mechanisms for reporting sexual harassment, exploitation and abuse, and child abuse are accessible** and sensitive to the differing needs of anyone wishing to report, including vulnerable adults and children most at risk of sexual harassment, exploitation and abuse, and child abuse, the communities we work with, our partners, and NEF Employees and Related Personnel. We will include documented reporting procedures in relevant local languages. We will raise program participant awareness on the



expected behaviors of our Employees and Related Personnel and on how to make a report. NEF will ensure that anyone responsible for receiving reports understands how to carry out their duties and handle them in a safe and confidential manner. We will be transparent with survivors around any obligations or actions that may need to be taken as a result of their report, including referral to third parties. All actions will be informed by an assessment of risk to all those involved.

### **Response and follow up to Reports**

- 3.11 **NEF will provide support and assistance to complainants and to anyone who has experienced sexual harassment, exploitation and abuse, or child abuse by NEF Employees and Related Personnel.** This may include medical treatment, legal assistance and psycho-social support. Our support and assistance will be informed by a survivor-centered approach, feasibility, and an assessment of risk to all those involved.
- 3.12 **NEF will take appropriate actions to the best of NEF's abilities to protect persons from retaliation** where allegations of sexual harassment, exploitation and abuse, or child abuse involving NEF Employees or Related are reported in good faith.
- 3.13 **NEF will ensure that all allegations of sexual harassment, exploitation and abuse, and child abuse by NEF Employees and Related Personnel are thoroughly examined, risk-assessed, and where needed, investigated and/or referred to another agency for investigation or reported to law enforcement.** NEF's investigations will be conducted in a timely, safe and professional manner by those with appropriate training and experience in sensitive investigations and informed by gender-sensitive and survivor-centered approaches. Investigations will include an assessment of risk to all those involved. We will collaborate with our partners to have the capacity to similarly investigate allegations of sexual harassment, exploitation and abuse, and child abuse by their staff.
- 3.14 **NEF will take swift and appropriate action with any Employee or Related Personnel who breach this policy by perpetrating sexual harassment, exploitation and abuse, and child abuse.** This may include administrative or disciplinary action, legal action, and/or referral to the relevant authorities for appropriate action, including criminal prosecution, in the abuser's country of origin as well as the host country. All actions will be informed by a survivor-centered approach and an assessment of feasibility and risk to all those involved.

## **4. NEF's Safeguarding Code of Conduct**

NEF's capacity to achieve its vision and mission depends upon the individual and collaborative efforts of all NEF Employees and Related Personnel. To this end, all NEF Employees and Related Personnel must uphold and promote the highest standards of ethical and professional conduct and abide by NEF's policies. This policy defines the safeguarding conduct to be followed by all NEF Employees and Related Personnel to protect anyone, from sexual harassment, exploitation and abuse, and child abuse by NEF Employees and Related Personnel.

This Safeguarding Code of Conduct is intended to provide an illustrative guide for NEF Employees and Related Personnel to make decisions that exemplify NEF's broader Code of Conduct and core values in their professional and personal lives. Any violation of this Safeguarding Code of Conduct is a serious concern and may result in disciplinary action, up to and including dismissal, in accordance with disciplinary procedures of each NEF Affiliate and applicable laws. All NEF Employees and Related Personnel must read and sign this



Safeguarding Code of Conduct.

## **5. Responsibilities**

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

All NEF Employees and Related Personnel share an obligation to prevent, report and respond to sexual harassment, exploitation and abuse and child abuse. It is the responsibility of all NEF Employees and Related Personnel to uphold NEF's Safeguarding Policy and Safeguarding Code of Conduct. All NEF Employees and Related Personnel must read this policy and either sign the Safeguarding Code of Conduct or sign a Code of Conduct that is consistent with or references this policy and Safeguarding Code of Conduct.<sup>2</sup>

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

Managers, Supervisors and Human Resource Managers must ensure that all NEF Employees and Related Personnel understand and comply with NEF's Safeguarding Policy and either sign the Safeguarding Code of Conduct or sign a Code of Conduct that is consistent with or references this policy and Safeguarding Code of Conduct. Human Resource Managers are also responsible for robust safe recruitment and induction, while Managers and Supervisors are responsible for ensuring staff have a thorough awareness and sensitization to this policy and the issues it raises. Managers must ensure that all staff with specialized duties towards this policy have the appropriate experience, training and support available to them, including staff responsible for receiving and handling sensitive reports and staff responsible for investigations. Managers will ensure performance management of staff, supports an accountable and safe organizational culture to prevent sexual harassment, exploitation and abuse, and child abuse.

### **5.3 Country Director or senior leadership in any country/region**

The Country Director or most senior leader in any country/region must provide clear guidance and demonstrate how the organization, across its operations, will make every effort to protect all people from sexual harassment, exploitation and abuse, and child abuse in the delivery of NEF projects and programs in-country. The Country Director or senior leadership in any country/region must collaborate with the Policy Administrator to ensure that culturally appropriate, safe and accessible, community-based reporting mechanisms are developed, implemented, and monitored and reviewed for effectiveness. This includes awareness-raising with program participants and NEF Employees and Related Personnel about protection from sexual harassment, exploitation and abuse, and child abuse, and how to use the reporting mechanisms. The Country Director or senior leadership in any country/region lead NEF's work with local partners to ensure appropriate support, assessment, and monitoring of partner commitments in relation to this Policy. The Country Director or senior leadership in any country/region will also make every effort to ensure that complaints handling, and investigation procedures are enacted, along with appropriate employee disciplinary procedures as necessary. The Country Director or senior leadership in any country/region are responsible for ensuring that good quality and appropriate survivor support services are researched and made available in their location.

### **5.4 NEF Human Resources and Legal and Compliance**

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



NEF Human Resources and Legal and Compliance is responsible for implementation of this policy. NEF Human Resources and Legal and Compliance will ensure this policy is reflected in the codes of conduct policy. NEF Human Resources and Legal and Compliance are responsible for defining and appropriately resourcing workplans and procedures to uphold and operationalize this policy as well as monitoring and reporting on performance against this policy utilizing standard key performance indicators and methodology. NEF Human Resources and Legal and Compliance must have in place reporting and investigation procedures, and employee disciplinary procedures for their staff which complement and support Country Office procedures.

NEF Human Resources and Legal and Compliance will provide the necessary support to Country Offices to ensure Country Offices have in place the necessary staff skills, budget guidance for putting this policy in place, reporting mechanisms, investigations procedures, survivor assistance support, and guidelines for reporting on performance against this policy.

NEF Global Human Resources will coordinate oversight of this policy in collaboration with NEF Legal and Compliance to review and update the policy. NEF Global Human Resources will monitor and report against this policy utilizing standardized data for global accountability.

## **5.5 NEF Board(s) of Directors**

The Board of Directors of NEF and its affiliates, must be notified of any breaches of this policy.

## **5.6 Associated Policies**

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

- NEF Code of Conduct and Code of Ethics
- Whistleblower Policy

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

## **6. Enabled Reporting**

NEF ensures that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with through targeted trainings or information sessions.

Anyone can raise a concern and there is a mandatory obligation on all staff and related people to report concerns, suspicions, allegations and incidents that indicate actual or potential abuse of children and/or adults at risk and any other breaches of this Policy. Reporting can be done directly or following the procedures outlined by the NEF Whistleblower Policy incorporated by reference into this policy and described below:

### **Country Focal Points**

Country Director or most senior leaders in country  
Protection and MHPSS staff



### **Regional Focal Points**

Aliaa AlMarafi, aalmarafi@neareast.org

Sipan Khoshnaw, skhoshnaw@neareast.org

Rusul Zahid, rzahid@neareast.org

Deng James Makuach, jdmakuach@neareast.org

**Global Human Resources Contact Information:** Lezlie Blaski, lblaski@neareast.org

**Compliance Officer Contact Information:** Adebola Aina, aaina@neareast.org

**Toll Free Ethics Line:** 1-866-921-6714 (US)

00-800-2002-0033 (Belgium & UK)

604-922-5953 (Global Collect)

**Ethics Line Email:** [nef@integritycounts.ca](mailto:nef@integritycounts.ca)

**Ethics Line Website:** [www.integritycounts.ca/org/nef](http://www.integritycounts.ca/org/nef)

Any concerns should be reported as soon as practicable to the Country Director / leader, designated SEAH Focal Point, Global Human Resources, Compliance Officer (the "Compliance Officer") or to NEF Board of Directors through the NEF's Ethics Line or any other direct means such as email.

Global Human Resources is responsible for assessing, investigating and resolving all reported concerns. The President is also required to report to the full Board of Directors at each regularly scheduled board meeting on any policy compliance-related activity. The President is the focal Point for reporting on Safeguarding matters at the Board level. The Executive Committee of the Board of Directors addresses all reported concerns regarding any and all violations or suspected violations of business and personal ethical standards as stated in NEF's Code of Conduct and Safeguarding Policy.

Global Human Resources shall immediately notify the President and the Chief Compliance Officer and together, shall evaluate whether a concern constitutes a criminal concern or a breach of code of conduct and, if so, shall promptly determine what professional assistance, if any, it needs in order to conduct an investigation. The President will notify the Board Chair of the breach prior to the start of the investigation.

Global Human Resources may delegate the responsibility to investigate a reported concern to one or more NEF employees or to any other individual, including persons not employed by NEF, such as external law firms or consulting firm, provided that Global Human Resources may not delegate such responsibility to an employee or other individual who is or may be the subject of the reported concern or in a manner that would compromise either the identity of an employee who reported the concern anonymously or the confidentiality of the complaint or resulting investigation.

Should the President be, or may be, the subject of a reported concern, all reports should be sent via NEF Ethics line and will be directed to the Board for follow up. In this instance, the scope, manner and parameters of any investigation of a reported concern involving, or potentially involving, the President shall be determined by the Executive Committee of the Board and NEF employees shall cooperate as necessary in connection with any such investigation.

NEF takes seriously its responsibility to report and encourages any person reporting a concern to identify themselves so as to facilitate any resulting investigation. Notwithstanding the



foregoing, in reporting a concern, a subject person may request that such report be treated in a confidential manner (including for NEF to take reasonable steps to ensure that the identity of the reporting person remains anonymous). Concerns may also be reported on an anonymous basis. Reports of concerns will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Anyone reporting a concern must act in good faith and have reasonable grounds for believing that the information disclosed may indicate a violation of policy, law, and/or ethical standards.

Global Human Resources will acknowledge receipt of each reported concern within five business days and will keep the person that made the complaints apprised on the progress of the investigation, but only to the extent the reporting person's identity is disclosed or a return address is provided. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the assessment or investigation. NEF will retain on a strictly confidential basis for a period of seven years all records relating to any reported concern and to the investigation and resolution thereof. All such records are confidential to NEF and such records will be considered privileged and confidential.

All those subject to complaints will be treated fairly and consistent with the principles of natural justice (i.e. rule against bias and the right to a fair hearing). Investigations will be objective, transparent, and will be guided by external professional expertise and support when required. To the extent practical, NEF will strive to maintain confidentiality to protect the affected individual(s) subject to its goal of engaging in a thorough investigation. NEF may, however, be required to disclose the allegations or result of the investigation to the authorities.

## **7. Retaliation**

Threats or acts of retaliation against a NEF staff who in good faith reports a possible violation of this Safeguarding Policy, any other policy, mandate, or requirement of NEF, or other misconduct (including violations by NEF staff) is prohibited. In the event you feel you have been retaliated against for having made such a report, you should follow the above procedures and contact the hotline immediately.

## **Additional Considerations**

A key element in making appropriate and effective responses to all protection concerns and in particular those affecting children and adults at risk is having a clear picture of the local context so that responses are made in line with legal, social welfare, and any other considerations. A mapping exercise is undertaken for each country where NEF has an office or is operating. The mapping process should identify important information such as the laws that exist for the protection of children and adults at risk, as well as the laws regulating sexual, domestic and other abuses and the identification of the agencies that have responsibility for investigating abuse matters and meeting the protection and health needs of all victims, as well as deciding on what steps must be taken when concerns arise about project beneficiaries. Based on outcomes of the mapping process, NEF will determine the appropriate reporting procedures and incorporate them into this policy as an integral part.

When working with children and adults at risk, NEF will ensure that all staff receive introductory training on Standard Operating Procedures designed in particular to safeguard the wellbeing of children and adults at risk.





## ANNEX 1 - NEF's Safeguarding Code of Conduct

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This Safeguarding Code of Conduct is intended to provide an illustrative guide for NEF Employees and Related Personnel to make decisions that exemplify NEF's broader Code of Conduct and core values in their professional and personal lives. Any violation of this Safeguarding Code of Conduct is a serious concern and may result in disciplinary action, up to and including dismissal, in accordance with disciplinary procedures of each NEF Affiliate and applicable laws. All NEF Employees and Related Personnel must read and sign this Safeguarding Code of Conduct.

As a NEF Employee or Related Personnel, I will–

1. Create and maintain a safe and equitable organizational culture that prevents and opposes sexual harassment, exploitation and abuse, and child abuse. I understand that I am obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of the NEF Global Safeguarding Policy and Safeguarding Code of Conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.
2. Treat everyone with dignity and respect and challenge attitudes and behaviors that contravene the NEF Global Safeguarding Policy and Safeguarding Code of Conduct.
3. Immediately report any concerns or suspicions regarding sexual harassment, abuse, or exploitation by a fellow worker, whether within the same agency or not, as well as any related personnel. I understand that failure to report any concerns may lead to disciplinary action. I will ensure that I am aware of the options available to me for reporting and that when I report a concern or allegation, I will do so confidentially.
4. Share sensitive information I may be aware of that relates to concerns of sexual harassment, exploitation and abuse or child abuse, whether involving staff, program participants or others in the communities where NEF works, through the reporting options available to me. I understand that for respect, dignity and safety of everyone involved, it is essential that I maintain confidentiality about any concerns or information I am aware of and only share information with staff of the appropriate function who need to know such information. I am aware that breach of this policy may put others at risk and will therefore result in disciplinary procedures.
5. Disclose to NEF any civil judgment or criminal conviction that relates to allegations made against me of sexual harassment, exploitation or abuse of anyone.
6. Always make sure I have another adult present when working with children.



7. Always ensure that for work-related purposes when I photograph or film a child, I:
  - comply with local traditions or restrictions for reproducing personal images;
  - obtain informed consent from the parent or guardian of the child, before photographing or filming a child, explaining how the photograph or film will be used;
  - ensure photographs, films, videos and DVDs present children in a dignified and respectful manner 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, and
  - ensure file labels do not reveal identifying information about a child, for example, name and exact location.
  
8. Protect, manage and utilize NEF human, financial and material resources appropriately and will never use NEF resources, including the use of computers, cameras, mobile phones or social media, to exploit, groom or harass participants of NEF programs, children or others in the communities in which NEF works. I am aware that this means that it is prohibited for staff to access, display or transmit offensive and/or pornographic material on any NEF-provided or subsidized electronic device (e.g. computer, tablet, phone) at any time, or on any personal electronic device on a NEF network in the workplace.

As a NEF Employee or Related Personnel, *I will not* -

1. Sexually harass, exploit or abuse anyone and understand that these behaviors constitute acts of gross misconduct and are therefore grounds for disciplinary action, up to and including dismissal.
2. Engage in any form of sexual activity or develop physical/sexual relationships with children (persons under the age of 18) regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense.
3. Exchange money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior. I understand this means I must not buy sex from anyone at any time, or exchange assistance that is due to program participants / beneficiaries for sex.<sup>4</sup>
4. Engage in any sexual activity or sexual relationship with program participants/beneficiaries. I am aware that such relationships are prohibited. I understand that such relationships are based on an improper use of my position and inherently unequal power dynamics and may undermine the credibility and integrity of NEF's work. I understand I must declare any previously existing relationships with program participants/beneficiaries to my line manager or HR manager. I will seek guidance on this prohibition from appropriate management.<sup>5</sup>

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<sup>3</sup> In alignment with IASC Six Core Principles Dated: September 2019

<sup>4</sup> NEF does not make judgment against individuals who sell sex in exchange for money, gifts or material support ('transactional sex'). However, NEF prohibits its Employees or Related Personnel from buying sex in order to prevent sexual exploitation and abuse from occurring.

<sup>5</sup> NEF sometimes engages community volunteers and incentive workers and recognizes that in these circumstances there may be existing sexual relationships between such volunteers and incentive workers with other community



5. Request any service or sexual favor from participants of NEF programs, children or others in the communities in which NEF works, and will not engage in sexually harassing, exploitative or abusive relationships.
6. Support or take part in any form of sexually exploitative or abusive activities, including, for example, child pornography, trafficking of human beings or child marriage.
7. Hire children for domestic or other labor, which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities or which places them at significant risk of injury or exploitation.
8. Use language or behavior towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.

## **ANNEX 2**

### **Definitions**

#### **A Child**

A child is any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood.

#### **Adults experiencing vulnerability**

Anyone 18 years or over who -

- is unable to take NEF of themselves/ protect themselves from harm or exploitation; or
- due to their gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.
- is in a situation of subordination and therefore experiencing a power differential putting them at risk.

#### **Sexual Harassment**

Sexual harassment is any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. While typically involving a pattern of behavior, it can take the form of a single incident.

#### **Sexual Exploitation**

Sexual exploitation means 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.

#### **Sexual Abuse**

Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

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members and program participants, including child marriages that would violate this policy. Information and disclosure of existing sexual relationships/marriages must be made prior to appointment of community volunteers and incentive workers and if/when considering entering into a sexual relationship/marriage once already engaged with NEF. Confidential records must be retained by management.



### **Child Exploitation and Abuse** (involves one or more of the following)

#### **a. Physical abuse**

Physical abuse occurs when a person purposefully injures or threatens to injure a child. This may for instance, take the form of slapping, hitting, punching, shaking, kicking, beating, burning, shoving or grabbing. Physical abuse can be a single or repeated act. It doesn't always leave visible marks or injuries.

#### **b. 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 non-physical nurture and emotional availability. Such acts have a high probability of damaging a child's self-esteem or social competence.

#### **c. Neglect**

Neglect is the failure to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being.

#### **d. Sexual Misconduct with a Child**

Sexual Misconduct with a Child is any form of sexual activity with a child. 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, the activity being intended to gratify or satisfy the needs of the other person. It may include, but is not limited to, contact or non-contact activities, the inducement or coercion of a child to engage in any sexual activity, the use of a child in prostitution or other sexual practices, or exposing a child to online sexual exploitation material, the use of children in pornographic performances and materials, or taking sexual exploitative images of children.

### **Grooming**

Grooming generally refers to behavior that makes it easier for an offender to procure a child or vulnerable adult for sexual activity. It often involves the act of building the trust of children and/or their caregivers or a vulnerable adult, to gain access to them in order to sexually abuse them. For example, grooming includes the provision of, or attention paid to a specific child or adult, providing gifts, money, drugs or alcohol to them, encouraging romantic feelings or exposing them to sexual concepts through conversation or exposure to pornography.

Online grooming is the act of sending an electronic message, series of messages or engaging over an online platform with content that may be of an indecent nature, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender.

Both children and vulnerable adults can be victims of grooming and online grooming, with children being particularly targeted by online groomers.

### **Safeguarding**

The measures we take to prevent, report and respond to harm or abuse and to protect the health, well-being and human rights of anyone that comes into contact with NEF, whether it is NEF Employees and Related Personnel, partners, program participants and communities.

### **Community Volunteer**

Persons from the local community where NEF is working and who undertake tasks for NEF



on a voluntary nature.

**Incentive Worker**

A person who is provided an incentive to do tasks for NEF that have a temporary and voluntary character. Incentive workers may, for example, be people with refugee status, internally displaced peoples, returnees, or members of the host community, who are working for NEF by doing tasks in return for incentives.

**Visitors**

Refers to a range of persons who are visiting NEF offices or programs, including donor representatives, journalists, media, researchers, celebrities, family members.



## Safeguarding Certification of Compliance

I \_\_\_\_\_ hereby certify that, except to the extent noted below, I have read, understand and am in compliance with the terms of the Near East Foundation Safeguarding Policy. I note the following questions for Global Human Resources, Compliance, or President.

Please put a checkmark in the appropriate box

None

I have the following questions (attach a separate sheet if necessary).

\_\_\_\_\_

Date \_\_\_\_\_

Signature \_\_\_\_\_

Title<sup>6</sup> \_\_\_\_\_

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<sup>6</sup> Director, title of office if an officer, Partner, Employee, Board Member, Volunteer, Interns, Consultant, Visitor, Contractor, Partner, Sub- grant or Sub-recipient, Awardee, Incentive Worker.