

SAFEGUARDING AND PSEAH POLICY FOR CHILDREN, YOUNG PEOPLE, AND ADULTS

MARCH 2026

THE SAFEGUARDING & PROTECTION FROM SEXUAL EXPLOITATION, ABUSE, AND HARASSMENT (PSEAH) POLICY IS AN INTEGRAL PART OF CORDAID'S INTEGRITY POLICY & PROCEDURE FRAMEWORK, WHICH OUTLINES APPLICABLE PRINCIPLES, ROLES & RESPONSIBILITIES, AND RELATED DOCUMENTS.

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1. INTRODUCTION

Cordaid is dedicated to fostering a safe, respectful, and inclusive environment for all individuals with whom we interact. This commitment extends to ensuring that we are a safe and welcoming work provider and that we maintain respect and dignity towards external stakeholders in our programs. This is not only because Cordaid is legally required to protect employees' health and safety (Occupational Health and Safety Act 2017), but fundamentally because any form of interpersonal misconduct runs counter to our vision of enabling a life in dignity for everyone.

This Safeguarding and Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH) Policy is an integral component of Cordaid's Integrity Policy & Procedure Framework, which delineates the governing principles, roles and responsibilities, and associated documents. This policy underscores Cordaid's unwavering zero-tolerance stance against all forms of interpersonal misconduct and inaction regarding Sexual Exploitation, Abuse, and Harassment (SEAH). We recognise the unequal power dynamics that exist across the organisation and in our interactions with the communities we serve, and we are committed to preventing and addressing all forms of harm.

This policy articulates our commitment to preventing and addressing all forms of harm, encompassing sexual exploitation, abuse, and harassment (PSEAH), child abuse, and other manifestations of interpersonal misconduct. It is founded upon a survivor-centred approach, prioritising the rights, needs, and safety of those affected by such misconduct. In alignment with humanitarian principles and human rights standards, this policy applies globally and takes precedence over local legislation where it sets a higher standard. This policy consolidates the previous Policy regarding undesirable behaviour (2017). It includes particular attention to safeguarding children, young people, and adults at risk, as previously outlined in Caritas Internationalis' Child and Vulnerable Adult Safeguarding Policy (2019), in combination with Cordaid's Board Resolution from 11 March 2019.

This policy should be read in conjunction with:

- Code of conduct
- Integrity framework
- Integrity Standard Operating Procedures
- Fraud Policy
- Conflict-of-interest Policy
- Complaints procedure
- Anti-terrorism and anti-money laundering policy
- Cordaid's Ethical Communication Guide

2. SCOPE

This policy applies to the behaviour of all Cordaid representatives towards everyone who comes into contact with Cordaid, both during and outside normal working hours.

This includes:

1. **Internally:** Board members, managers, staff, consultants, volunteers, and interns – all referred to as Cordaid representatives.
2. **Externally:** Children, young people, adults (including adults at risk), beneficiaries, partner staff, and any other individuals or entities who come into contact with Cordaid's programmes and operations. This also extends to any individuals or entities who have entered into partnership, sub-grant, or sub-recipient agreements with Cordaid.

3. WHAT IS INTERPERSONAL MISCONDUCT?

“Interpersonal Misconduct” is an umbrella term that includes any harm or potential for harm committed against another person or group, as distinct from, for instance, fraud, which involves harm to resources. Interpersonal misconduct includes, but is not limited to, sexual harassment, sexual exploitation, sexual abuse, bullying, discrimination, aggression, and violence.

Building on Cordaid's commitment to respectful and dignified interactions, unethical communication, particularly when it involves the use of harmful stereotypes, discriminatory language, or a lack of respect, also falls under this category. Section 5.3 provides a non-exhaustive list of interpersonal misconduct.

Interpersonal misconduct is not always intended to cause harm to another person. Furthermore, depending on personal experiences, character traits, and cultural and religious influences, what is perceived as inappropriate can differ among individuals or across circumstances.

As a guideline, interpersonal misconduct can refer to behaviour that:

- Is illegal or prohibited under Cordaid's Code of Conduct and in this policy. For example, child abuse, discrimination, or sexual harassment.
- Is explicitly unwanted: the person affected has made it clear, through words or actions, that the behaviour is not welcome.
- Can reasonably be believed to be inappropriate or unwanted: the behaviour would usually be considered unacceptable, hostile, demeaning, intimidating, or offensive in the given context, regardless of whether the person affected has explicitly expressed this perception.
- Involves the actual or attempted abuse of a position of vulnerability, differential power, or trust, including exploiting that power for personal gain.

4. WHO CAN BE AFFECTED BY INTERPERSONAL MISCONDUCT?

Any person who comes into contact with Cordaid, whether internally or externally, can be affected by interpersonal misconduct.

- **Internally:** This includes all Cordaid representatives: BoD, managers, staff, consultants, volunteers, and interns.
- **Externally:** This includes, but is not limited to, children, young people, adults (including adults at risk), beneficiaries, partner staff, and any other individuals or entities who come into contact with Cordaid's programmes and operations. All communication, including descriptions of vulnerable groups, should align with the inclusive language principles in Cordaid's Ethical Communication Guide.

Both perpetrators and those affected can be of any gender, age, or position within or outside the organisation. However, it is recognised that some people are disproportionately at risk of being affected by interpersonal misconduct and may face greater barriers in speaking out. This heightened vulnerability can be attributed to a person's position of power within the organisation and in society, which is influenced by the intersection of factors such as age, gender, religion, ethnicity, race, sexual orientation, gender identity (LGBTQI+), disabilities, health status, and other relevant aspects of their identity.

5. SAFEGUARDING

5.1 KEY SAFEGUARDING PRINCIPLES

Cordaid commits to the Inter-Agency Standing Committee's core principles relating to the Prevention of Sexual Exploitation and Abuse Harassment (PSEAH). Specifically, Cordaid representatives will always adhere to the following principles:

1. Sexual harassment, exploitation, and abuse, and child abuse by Cordaid representatives constitute acts of gross misconduct and will lead to disciplinary measures, including termination of employment or contract. Cordaid may also be required to report to relevant authorities or take legal action if required.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
3. The exchange of money, employment, goods, services, or assistance for sex, including sexual favours or other forms of humiliating, degrading, or exploitative behaviour, is prohibited. This includes the exchange of assistance that is due to beneficiaries.
4. Any sexual relationship between Cordaid employees or representatives and beneficiaries (including their immediate family members) is strictly prohibited. Such relationships are based on inherently unequal power dynamics and are considered a form of sexual exploitation. This prohibition is absolute and reflects Cordaid's zero-tolerance stance against abuse of power and trust. Employees must disclose any pre-existing relationship with a community member we work with to their line manager, HR, and/or Integrity Officer.
5. When Cordaid representatives develop concerns or suspicions regarding sexual abuse, sexual exploitation, or sexual harassment by a fellow worker, whether within Cordaid or from another organisation, they must report such concerns via established reporting mechanisms.
6. Cordaid staff and representatives are obliged to create and maintain an environment that prevents sexual harassment, sexual exploitation and abuse, and all forms of child abuse, and promotes the implementation of this policy. Managers at all levels have specific responsibilities for supporting and developing systems that maintain this environment.
7. Cordaid will not work with partners who do not have proper safeguarding procedures in place. To ensure this commitment, and to verify and maintain compliance:
 - o To ensure partners meet Cordaid's safeguarding standards, which include a written safeguarding policy and code of conduct, clear reporting and response procedures, safe recruitment, risk assessment and mitigation, and staff training and awareness:
 - o Assessments of potential partners are conducted to evaluate existing safeguarding policies, procedures, and training as part of "Integrity Due Diligence" and the "Partner Capacity and Risk Assessment (PCRA)" process.
 - o Where gaps are identified, Cordaid provides capacity building and support to partners, integrated into the partnership agreement.
 - o Agreements with partners explicitly incorporate this Safeguarding Policy as an attachment and require adherence to its standards. Failure to take preventive measures against SEAH, to investigate and report allegations, or to take corrective actions constitutes grounds for termination of the agreement.
 - o Partner monitoring processes include checks on safeguarding implementation and reporting, with partners' capacity in this area assessed, monitored, and supported throughout the partnership lifecycle.
8. Cordaid will ensure that, when engaging in partnerships, sub-grant or sub-recipient agreements, these agreements:
 - o incorporate this Policy as an attachment.
 - o include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers, to abide by a Code of Conduct that is pursuant to the standards of this Policy; and
 - o expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against sexual exploitation and abuse and sexual harassment, to investigate and report allegations thereof, or to take corrective actions when SEAH has occurred, shall constitute grounds for Cordaid to terminate such agreements.

5.2 SAFEGUARDING FOR CHILDREN

Cordaid adheres to the United Nations Convention on the Rights of the Child, defining a child as every human being below the age of eighteen years (Article 1, UNCRC). Central to our approach is the “best interests of the child” principle, ensuring that in all actions and decisions concerning children, their welfare shall be a primary consideration.

Cordaid adheres to the United Nations Secretary-General’s Bulletin ST/SGB/2003/13 on Special measures for protection from sexual exploitation and sexual abuse. Cordaid accepts the standards of conduct listed in section 3 of the ST/SGB/2003/13. Cordaid representatives will adhere to all local and international child protection legislation (or this policy where the policy is of a higher standard) in countries where they travel and work, as well as international laws and conventions in relation to all forms of child abuse and child exploitation, including but not limited to child sex tourism, child sex trafficking, child labour, and child pornography.

Cordaid also adopts the following United Nations definitions:

- Sexual harassment is defined in the UNSG’s bulletin ST/SGB/2008/5.
- Sexual exploitation and abuse are defined in the 5 Oct 2016 UN Glossary on Sexual Exploitation and Abuse.

Cordaid representatives will respect children’s right to participate in any decision affecting them to the fullest extent possible and will ensure their views are heard and acted upon.

Cordaid commits to adhering to even more rigorous integrity standards when working with children. Specifically, Cordaid representatives and other external parties will adhere to the following Do’s and Don’ts.

The Do’s

- Do have at least one other adult present, or at least in sight of other adults, when working with a child.
- Do ensure that an adult caretaker is present when transporting a child or have appropriate permission.
- Do disclose all charges or convictions relating to child abuse or sex offences.
- Do stop any behaviour if a child expresses discomfort.
- Do interact with children, youth, and beneficiaries in a respectful and culturally appropriate manner.
- Do obtain clear, informed, and age-appropriate consent before taking pictures of or interviewing a child, recognising that the requirements change based on the child’s age:
 - **For children under 12 years old:** Obtain informed consent from their parent or legal guardian. The child must still be told what is happening in a way they can understand, and their willingness to participate (their assent) should be prioritised and respected.
 - **For children between 12 and 16 years old:** Obtain informed consent from both the child and their parent or legal guardian.
 - **For young people 16 years and older:** Obtain their own informed consent, treating them as capable of making their own decision.

The Don’ts

- Do not engage in any sexual activity with children under 18, including any sexualized touching.
- Do not hit or otherwise physically abuse children (even if culturally acceptable).
- Do not emotionally or verbally abuse children, including shouting at, humiliating, or shaming a child.
- Do not ask a child to do any personal favours.
- Do not send degrading or harmful written or verbal messages to a child, such as sexting or pornography.
- Do not use any computers, mobile devices, video cameras, social media, or other means to exploit or harass children or to access, download, or share child pornographic material.
- Do not hire a child.
- Do not encourage a child to meet outside of work-related activities.
- Do not take a child who is participating in or is a beneficiary of Cordaid programmes to your home or sleep in the same bed.
- Do not do things of a personal nature for a child that they can do for themselves (e.g., personal hygiene).
- Do not show favouritism or discriminate against any child or group of children.

- Do not be intoxicated or under the influence of drugs when working with children.
- Do not get involved in any compromise settlement with parents, abusers, or authorities when a child is abused.

The above guidelines should also be applied to young people and adults at risk who may have a limited ability to give or withdraw consent, such as people with certain mental disabilities.

5.3 PROHIBITED BEHAVIOUR

TABLE 1 » PROHIBITED BEHAVIOUR

Abuse	Description
Sexual abuse	<p>Sexual abuse is defined in the UN Glossary on Sexual Exploitation and Abuse (5 Oct 2016). It includes any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes. It is also any unwelcome sexual advance, expressed or implied request for sexual Favour, verbal or physical conduct, or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected to be perceived to cause offence or humiliation to another.</p> <p>Sexual abuse includes:</p> <ul style="list-style-type: none"> • Unwanted sexual activity or behaviour that happens without consent or understanding. The activities may involve physical contact, including assault by penetration (e.g., rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching. • Non-contact activities, such as involving the individual involuntarily in looking at, including online and with mobile phones, or in the production of, pornographic materials, watching sexual activities or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).
Physical	Includes, but is not limited to, hitting, slapping, pushing, kicking, unlawful or inappropriate restraint, and inappropriate physical sanctions.
Emotional	Harm done by persistent or severe emotional ill-treatment or rejection, such as degrading punishments, threats, bullying, and not giving care and affection (especially to children). Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.
Neglect	The persistent failure to meet basic needs such as food, warmth, and medical care, or to prevent exposure to any danger. This is particularly relevant where someone fails to fulfil their care responsibilities for a child or other dependent.
Aggression and Violence	<p>Harassment, threats, or attacks, e.g.:</p> <ul style="list-style-type: none"> • Physical: damage to belongings, kicking, hitting, and pushing. • Psychological: gossip, unpleasant comments, jokes at a person's expense, swearing, insults, threats, intimidation, public reprimands, and making gestures.
Bullying	Repeated verbal, physical and/or social behaviour that intends to cause physical, social, and/or psychological harm. It can involve an individual or a group misusing their power, or perceived power, over one or more persons who feel unable to stop it from happening. Bullying can happen in person or online, via various digital platforms and devices, and it can be obvious (overt) or hidden (covert). Bullying behaviour is repeated, or has the potential to be repeated, over time (for example, through the sharing of digital records).
Discrimination	Abuse, harassment, slurs, hate speech or crime, or any other differential treatment, based on an individual's (perceived) personal characteristics such as race, ethnicity, nationality, gender, disability, health status, faith including non-believers, being LGBTQI, age, marital status, parenthood including pregnancy, refugee status, work status (working hours, type of contract), or others.
Exploitation	Actual or attempted abuse of a position of vulnerability, differential power, or trust to profit from the sex acts of others, including children, forced labour or services, including child

	labour, slavery, or practices similar to slavery, servitude, the removal of organs, or trafficking. This does not include consensual sex acts with adult sex workers who are not directly benefiting from Cordaid's work. See further our Code of Conduct.
Workplace Harassment	<p>Workplace harassment is when a person is subjected to behaviour (other than sexual harassment) that:</p> <ul style="list-style-type: none"> • Is repeated, unwelcome, and unsolicited. • The person considers it to be offensive, intimidating, humiliating, or threatening. • A reasonable person would consider it to be offensive, humiliating, intimidating, or threatening. <p>An employer, a worker, a co-worker, a group of co-workers, a partner, a donor, or a member of the public can commit workplace harassment. Workplace harassment covers a wide range of behaviours. Some examples include (but are not limited to):</p> <ul style="list-style-type: none"> • Abusing a person loudly, usually when others are present. • Repeated threats of dismissal or other severe punishment, which do not follow OAU's standard disciplinary procedures. • Making/sending offensive messages (e.g., via email, telephone, or other means). • Significantly impairing the person's work in any way, such as withholding information, removing content, or altering the intent of the person's work. • Maliciously excluding and isolating a person from workplace activities that they would normally be involved in. • Persistent and unjustified criticisms, often about petty, irrelevant, or insignificant matters. • Humiliating a person through gestures, sarcasm, criticism, and insults, often in front of others. • Spreading false information.
Sexual Harassment	<p>Sexual harassment is defined in the UNSG's bulletin ST/SGB/2008/5 as any unwelcome sexual advance, expressed or implied request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another. Such conduct will also be considered sexual harassment when it interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. While typically involving a pattern of behaviour, it can take the form of a single incident.</p> <p>Examples:</p> <ul style="list-style-type: none"> • Verbal forms: jokes and comments of a sexual nature, inappropriate comments about clothing or appearance, suggesting having sex, reporting erotic experiences, fantasies, or dreams. • Non-verbal forms: staring and peeping, physically approaching too closely, gestures of a sexual nature, pornographic e-mails, or screensavers. • Physical forms: kissing, touching breasts, buttocks, or other body parts, hugging, standing unnecessarily close, etc.
Grooming	The process of befriending a child, young person, or adult on- or offline, thereby obtaining their trust before exploiting, harassing, or abusing them.
Inappropriate Relationships	<p>Inappropriate relationships are consensual yet pose a risk of exploitation of a power differential or a Conflict of Interest – e.g., a relationship between a staff member and their line manager or between staff and beneficiaries.</p> <p>Staff members are strongly encouraged to disclose such a relationship to prevent perceptions or allegations of exploitation. Disclosure allows for a joint assessment of whether the relationship might be inappropriate for the workplace. Adjustments might be necessary, e.g., a change in team or the relocation of staff to another activity.</p>
Misuse of Power Authority	Improper use of a position of influence, power, or authority against another person, e.g., to improperly influence the career or employment conditions of another, including, but not limited to, appointment, assignment, contract renewal, performance evaluation, working conditions or promotion. Abuse of authority may also include conduct that creates a hostile or offensive work environment, such as intimidation, threats, blackmail, or coercion.
Stalking	Deliberately and repeatedly following or harassing another person, which makes them feel unsafe. This may occur in a variety of ways: in person, by mail, by telephone, by e-mail, or via text messages.
Unsafe Programming	Gross negligence in programme design or implementation that creates foreseeable integrity risks.

Consensual relationships between Cordaid representatives are permitted, provided they do not involve a hierarchical or de facto power imbalance, do not interfere with professional responsibilities, and do not compromise the work environment.

To prevent conflicts of interest and the perception of exploitation, Cordaid requires all representatives to proactively disclose any romantic or sexual relationship with another team member to their line manager and/or Integrity Officer. Where such a relationship involves a supervisor, manager, or leader and a direct or indirect report, disclosure is mandatory. Disclosure allows for a joint assessment of the situation, and, if necessary, adjustments will be made, such as a change in team or the relocation of staff to another activity. Failure to disclose a mandatory relationship may be considered a breach of this policy.

6. PREVENTION OF SEXUAL HARASSMENT, EXPLOITATION AND ABUSE, CHILD ABUSE AND PROHIBITED BEHAVIOUR

To prevent sexual harassment, exploitation and abuse, child abuse and other prohibited behaviour, Cordaid will ensure safe recruitment, safe programming, training and awareness and proper management of communication and marketing is embedded in Cordaid’s processes and programmes.

TABLE 2 » PSEAH MEASURES

PROCEDURE	PSEAH MEASURES
Recruitment	<ul style="list-style-type: none"> • Job adverts include PSEAH commitments. • Gaps in employment history checked during interview. • Questions related to PSEAH were asked during the interview. • At least two references taken, preferably verbally, from previous employers, which include questions on the candidate's conduct and behaviour (MDS). • Criminal records check is conducted, where possible. • Consider a self-declaration form, where staff declare that they have no previous convictions or dismissals that prevent them from working with children or at-risk adults. • New employees sign contracts which include PSEAH and the organisation's code of conduct. Cordaid is a signatory to the Inter-Agency Misconduct Disclosure Scheme.
Induction / Training	<ul style="list-style-type: none"> • Induction includes at least a briefing on PSEAH. • All staff receive a half-day training on PSEAH - recognising and responding to risks and concerns. Annual refresher training opportunities provided
Performance Management	<ul style="list-style-type: none"> • Performance management discussions include an understanding of PSEAH and an opportunity to raise concerns. Where performance management includes working on values or competencies, these include PSEAH
Whistleblowing	<ul style="list-style-type: none"> • Cordaid's whistleblower policy and procedure encourages people to report concerns without fear of reprisals
Disciplines and Grievance	<ul style="list-style-type: none"> • Cordaid treats SEAH as grounds for disciplinary action, which may constitute immediate termination of employment
Programme Guidelines	<ul style="list-style-type: none"> • Programming guidelines include identifying and mitigating risks of sexual exploitation, abuse, and harassment in programs to make them safer

Risk Register	<ul style="list-style-type: none"> • SEAH risks are integrated within Cordaid's risk management framework, identified and assessed primarily in Integrity risk assessments and the Ethics Point system. • While not a distinct strategic or country-level risk category, SEAH is recognised as a significant component of integrity breaches, specifically interpersonal misconduct. • Major SEAH risks are addressed through assigned ownership or expert referrals. • Our Integrity Framework ensures all forms of misconduct, including SEAH, are systematically prevented, reported, and responded to. • Monitoring systems, including the confidential case management system and regular reporting to the Integrity Committee, track all reported integrity incidents, encompassing safeguarding concerns.
Complaints/Reporting	<ul style="list-style-type: none"> • Complaints/reporting mechanism developed to receive and respond to reports of SEAH

Safe recruitment

Cordaid is committed to preventing known perpetrators of child abuse, sexual harassment, exploitation, and abuse from being hired, re-hired or redeployed. It is also committed to mitigating potential safeguarding risks affecting children, young people, and adults. Cordaid will therefore ensure that screening is incorporated in the recruitment process for all Cordaid representatives. Screening procedures will include, but are not limited to, reference checks from previous employers and background checks. During recruitment, a criminal background check will be conducted for staff recruited to positions that require working directly with children and/or vulnerable adults. These staff will be asked behaviour-based questions during interviews. It will be required to sign a declaration that they have not been charged and or involved in sexual harassment, exploitation, and child abuse offences.

Safe programming

Cordaid recognises that programmes may have inherent safeguarding risks to children, young people, and adults. Project leaders will therefore conduct safeguarding risk assessments of their programmes and develop and document mitigation measures for the identified risks. Safeguarding measures will be embedded across all stages of the project cycle and in the relationships between partners and programme participants.

Training and awareness

All Cordaid employees, consultants, volunteers, interns, the board, and partners will receive safeguarding training upon joining Cordaid as part of their induction training. Refresher training will also be provided to existing employees and to the board members upon re-election.

Communication and marketing

1. Cordaid commits to comply with the local cultures, traditions and other restrictions when reproducing personal images. The images used should give an honest representation of the context and facts. In all forms of Cordaid's communications, children, young people, and adults will be treated with dignity and respect.
2. Cordaid representatives must seek consent from adults and/or guardians/parents of children who are subjects of photos, videos, and audio taken on behalf of Cordaid.
3. Personal information from children, young people and adults that is collected, stored, or shared during Cordaid's work must be held securely and adhere to relevant data protection laws.
4. Published materials concerning children and adults at risk should only mention the first name and country to protect their identity.
5. In instances when the published materials contain sensitive subjects, images should be covered, and pseudonyms should be used.

7. WHAT TO DO IF YOU EXPERIENCE OR WITNESS INTERPERSONAL MISCONDUCT?

Representatives of Cordaid and persons outside Cordaid who witness or are made aware of suspected interpersonal misconduct are expected to report it. Any individual can raise a concern/complaint to Cordaid about an incident they have experienced, witnessed, or heard about concerning a Cordaid staff member or partner (suppliers, partners, contractor, etc.) without fear of retribution.

Allegations of interpersonal misconduct should be reported for two key reasons:

- To enable the person affected to receive support and to put a stop to the misconduct.
- To help Cordaid identify and manage risks and trends, which can be used to strengthen the culture of integrity within the organisation, for example, by providing training, issuing warnings, or dismissing staff who do not respect Cordaid's integrity standards.

A report of alleged interpersonal misconduct must never harm the person making the report. The Management and direct supervisor must protect the staff reporting the allegations against any reprisal. Cordaid does not condone retaliation against anyone who reports suspected interpersonal misconduct or participates in the investigation process. Any form of retaliation or deterring anyone from reporting suspicions of interpersonal misconduct will be treated as misconduct and may result in disciplinary action.

Cordaid representatives and other external parties can make a report about allegations of interpersonal misconduct through the following channels:

- Directly to the Integrity & Safeguarding Officer via integrity@cordaid.org or
- By filling the reporting form on EthicsPoint and sending it to the Integrity & Safeguarding officer via integrity@cordaid.org.
- To the immediate or higher supervisor, who will then submit the report to the Integrity Officer. In case of a partner, consultant, or supplier, to the manager in charge of their contract. Persons who have formed suspicions may also report to higher supervisors where the immediate supervisors are implicated, or they feel the immediate supervisor will not take the report seriously.
- Online via <https://www.cordaid.org/en/who-we-are/our-integrity-policy/>
- Where necessary, Cordaid Country Offices will establish alternative offline reporting channels to enable Cordaid representatives, community members, and others to report sexual exploitation and abuse and sexual harassment safely. Designed and implemented in consultation with local communities and staff to ensure safety and accessibility, these channels (e.g., secure drop-boxes, Integrity Hotlines, secure SMS) and information on how to access them, including child-friendly and accessible messaging, will be disseminated in local languages.

Staff who are unable to report to their line manager or directly to the Integrity Officer may also use the external whistleblowing service. Reports of Interpersonal misconduct can also be sent through the following external channels:

- An external Whistle-blower Service via +31 (0)88 1331 030, via email to advies@huisvoorklokkenluiders.nl, or directly online (Dutch). To report (suspected) misconduct via the House of Whistleblowers, the wrongdoing must be of public interest and based on reasonable suspicions.
- Make use of the whistleblower service at the secretariat of ACT Alliance (of which Cordaid is a member) by sending an email via complaintsbox@actalliance.org.

Or make use of the whistle-blower service of Caritas Internationalis (of which Cordaid is a member) via the Caritas Internationalis Secretary General directly (If the complaint is against the Secretary General, then the Complaint Handling Officer will report to the President.)

Cordaid representatives and any other external parties who intend to report allegations of interpersonal misconduct are encouraged to exhaust the internal reporting channels first, unless they believe the allegations will not be taken seriously.

Cordaid will treat anonymous reports as any other report, provided sufficient information is available to process the complaint.

All allegations of interpersonal misconduct will be taken seriously, treated confidentially, and followed up on as outlined in the Integrity SOPs, which detail the steps to be taken.

7.1 FALSE AND MALICIOUS REPORTING

Reports of alleged interpersonal misconduct must be made in good faith. Intentionally submitting a false report constitutes misconduct and will result in disciplinary measures. However, disciplinary measures will not be taken against an individual who reports misconduct in good faith, even if the allegations are not substantiated after an investigation or review.

7.2 EXTERNAL REPORTING

As a general principle, when sharing safeguarding data and statistics with governing bodies and donors, Cordaid will ensure that all personal details and identifying information of survivors, reporters, or alleged perpetrators are anonymised.

When reported allegations of interpersonal misconduct are substantiated, an external report will be made:

1. To the donor(s) if the contractual obligation between Cordaid and the donor requires it. The project owner is responsible for reporting to the donor(s) about the substantiated interpersonal misconduct.
2. To the local police or other relevant authorities, where necessary and in accordance with local laws. The case manager is responsible for ensuring the relevant authorities are informed.
3. To the CBF and Dutch MOFA, following their specific procedures and only via the CEO.
4. Only staff with delegated authority can report to external donors and regulatory authorities. Survivors/Victims have the right to report directly to regulatory authorities within their country. Cordaid will assist survivors/victims in making a report if they request this. Staff with delegated authority for external reporting includes the :
 - Case Manager, Decision Maker/Committee, or the Country/Cluster Director holds this responsibility. For significant risks or sensitive cases, particularly those involving SEAH and financial integrity, the
 - Anti-Corruption and Anti-Fraud Officer reports to the Supervisory Board/Audit Committee on matters of financial Integrity.
 - The Integrity & Safeguarding Officer reports to the Supervisory Board/Remuneration Committee on Interpersonal Integrity and on integrity trends and complaint metrics.
 - Reporting to MoFA officials is conducted specifically via the CEO.
 - Reporting to external donor and regulatory authorities by staff with delegated authority is done after consultation with the Anti-Corruption and Anti-Fraud Officer (ACAFO) and the Integrity and Safeguarding Officer (ISO), and requires approval from the Board of Directors (BoD) or the CEO, particularly for severe or high-risk cases

7.3 CONFIDENTIALITY

Cordaid respects confidentiality and is committed to protecting sensitive personal data in accordance with the data protection policy. Information should be shared and handled on a need-to-know basis; access to it must be necessary to conduct official duties.

Only individuals with a legitimate need to access the information are authorised to receive it. Breaching confidentiality constitutes misconduct and may result in disciplinary measures.

Information that identifies individuals involved in a complaint will be limited to personnel with the absolute need to have such information and will not be shared further without obtaining the informed consent of the survivor, except if someone's life is at risk, a child is at risk, or as required by law in consultation with legal counsel and where safe to do so.

8. INVESTIGATION AND RESPONSE

Cordaid is committed to the prompt and impartial investigation of all reports of interpersonal misconduct, in accordance with the principles and procedures outlined in the Integrity SOPs. Investigations will be guided by key principles: confidentiality, impartiality, timeliness, fairness, evidence-based practice, the principle of "Do No Harm," the best interests of the child (if applicable), and a survivor-centred approach.

The investigation process will follow the procedures detailed in the Integrity SOPs, including the assignment of a PSEAH-trained investigator(s), evidence gathering, confidentiality agreements, and the production of an investigation report. Investigators and safeguarding focal points will keep survivors informed, ensure that survivors understand the process, and offer support services. Cordaid prioritises a survivor-centred approach, emphasising dignity, safety, respect for decisions, confidentiality, and non-discrimination.

Reporting to Legal Authorities

When an investigation reveals that a crime may have been committed under applicable local or international law, Cordaid will carefully consider whether to report the incident to the relevant legal authorities. This decision will be made in accordance with:

- The principle of doing no further harm to the survivor and any other affected individuals.
- A survivor-centred approach, prioritising the survivor's informed consent and wishes, to the extent that it is safe and feasible.
- Cordaid's duty of care to all those we work with and our legal obligations.
- A documented risk assessment, weighing the potential benefits and risks of reporting in the specific context.

9. ROLES AND RESPONSIBILITIES

Cordaid employees and representatives

All Cordaid employees and representatives have the following responsibilities:

- To read, understand, and comply with the content of this policy, the Code of Conduct, and other related policies and procedures.
- To be alert to and report any suspicions or incidents of interpersonal misconduct, including sexual harassment, exploitation and abuse, child abuse, and other prohibited behaviour, promptly through the appropriate reporting channels.
- To actively participate in preventing and responding to allegations of interpersonal misconduct, as guided by this policy and related policies, and to cooperate fully with any authorised investigation.
- To treat all individuals with respect and dignity, and to refrain from any behaviour that could constitute interpersonal misconduct.
- Not to condone, participate in, or fail to report any prohibited behaviour.
- To attend all required safeguarding and PSEAH induction training and any other refresher training provided by Cordaid.
- To create and maintain a safe and respectful environment, and to promote awareness of this policy and related reporting mechanisms.

Managers, Country Directors, and Project leaders

Managers, Country Directors, and Project leaders have the following responsibilities:

- To conduct safeguarding risk assessments of programs and activities, develop, and document clear strategies and procedures to mitigate identified risks, and integrate safeguarding measures into all stages of the project cycle.
- To ensure that partnerships, sub-grant, and sub-recipient agreements include clauses on PSEAH, and to assess and build partner capacity to implement safeguarding measures.
- To create and maintain a safe, respectful, and inclusive environment that prevents interpersonal misconduct, including sexual harassment, exploitation and abuse, child abuse, and other prohibited behaviour, and to develop and support systems and processes to uphold this environment.
- To promote awareness of this policy and related reporting mechanisms, and to ensure that all staff and Related Personnel receive regular and effective PSEAH training.
- To model exemplary behaviour, uphold the Code of Conduct, and take swift and appropriate action to address any concerns or allegations of interpersonal misconduct within their teams or programs.
- For cases where a member of the BoD is named in an integrity report, their standard authority to oversee the case is immediately suspended, and decision-making is escalated to the Supervisory Board to ensure independent oversight

Integrity Focal Points

Integrity Focal Points, based in Country Offices and the Global Office, play a vital role in supporting the implementation of this policy at the field level. Their responsibilities include:

- To serve as a key point of contact for receiving and reporting concerns and allegations of interpersonal misconduct within their respective Country Offices.
- To provide support and guidance to staff and affected individuals, ensuring that they are aware of reporting channels and available support services.
- To conduct initial assessments of reports and, if trained and authorised, to lead or support investigations in collaboration with the Integrity & Safeguarding Officer.
- To promote awareness of this policy and related procedures through training and communication activities within their Country Offices.
- To maintain confidential records of reports and investigations, in accordance with data protection policies.

Integrity & Safeguarding Officer

The Integrity & Safeguarding Officer:

- To receive, assess, and record all reports of alleged interpersonal misconduct, and to ensure that reports are handled in a confidential and timely manner.
- To oversee and, where necessary, conduct thorough and impartial investigations, ensuring that investigations are conducted in accordance with established procedures and principles of fairness.
- To provide support, advice, and information to survivors and other individuals affected by interpersonal misconduct, ensuring that they are aware of their rights and available support services.
- To promote awareness and understanding of this policy and related procedures through the development and delivery of training programs for all Cordaid representatives and relevant third parties.
- To monitor the implementation of this policy, identify areas for improvement, and make recommendations to senior management on strengthening safeguarding practices.
- To ensure that this policy and related reporting mechanisms are accessible to all relevant parties, including staff, partners, and communities.

The Integrity Committee

The Integrity Committee plays a crucial advisory role in providing oversight, guidance, and support for the effective implementation of the Safeguarding and PSEAH Policy. Its responsibilities include:

- To monitor the implementation of the policy and related procedures, regularly reviewing their effectiveness and identifying areas for improvement.
- To promote a culture of integrity and accountability throughout the organisation, fostering an environment where concerns can be raised without fear of retaliation.
- To review and provide recommendations on proposed changes to the Safeguarding and PSEAH Policy and related procedures.

The Chief Financial Officer

The Chief Financial Officer (CFO) is responsible for the effective oversight and support of the organisation's integrity functions. This includes:

- Supervising the work of the Integrity and Safeguarding Officer, ensuring they have the necessary resources and support to carry out their responsibilities.
- Collaborating with the CEO to promote a culture of integrity and ensure that safeguarding and PSEAH are integrated into organisational practices.
- Ensuring that financial resources are appropriately allocated for investigations, support services, training, and other safeguarding-related activities.
- Monitoring financial controls and procedures to mitigate the risk of fraud or misuse of funds in relation to safeguarding incidents.
- In the event of an integrity complaint involving the CFO or other members of the BoD, standard oversight and reporting lines are immediately suspended. The Supervisory Board assumes direct oversight of the investigation, and the CFO's access to the specific digital records in the Integrity Register is restricted to ensure impartial handling and prevent any interference.

Chief Executive Officer

The Chief Executive Officer (CEO) holds ultimate responsibility for ensuring that this policy is effectively implemented throughout the organisation and that a culture of safeguarding is embedded in all its operations. While the Integrity and Safeguarding Officer reports to the CFO, the CEO remains accountable for:

- Providing strong leadership in promoting a culture of safeguarding and ensuring that adequate resources are allocated for the implementation of this policy.
- Ensuring that all levels of the organisation are aware of their responsibilities under this policy.
- Overseeing the organisation's efforts to prevent and respond to interpersonal misconduct and regularly reviewing the effectiveness of these efforts.
- Demonstrating a personal commitment to safeguarding and ensuring that all individuals are protected from sexual harassment, exploitation, and abuse, and all other forms of interpersonal misconduct.
- In accordance with our independent oversight protocols, any interpersonal misconduct allegations involving the CEO or other members of the BoD are handled directly by the Supervisory Board. This triggers an immediate suspension of standard reporting lines to the CEO to ensure the integrity of the investigation.

Cordaid Supervisory Board

- Cordaid board holds the overall accountability for this policy and its implementation.
- In the event of an integrity complaint involving BoD the Supervisory Board acts as the independent Decision Maker, replacing the Board of Directors to ensure impartial oversight and prevent retaliation.

10. GLOSSARY

Adult at risk

Someone over the age of 18 who is unable to take care of themselves / protect themselves from harm or exploitation, or who, due to their gender, mental or physical health, disability, age, or as a result of disasters and conflicts, is deemed to be at higher risk of being abused.

BoD

This term refers to Cordaid's statutory board.

Child

A person under the age of 18 years, regardless of the age of majority or age of consent in the country in which the child lives or in their home country

Complainant

A person who makes a complaint/report about misconduct to the organisation/authorities: this can be the person affected by the misconduct or a witness/whistleblower. The term is not to be understood negatively, as in 'nit-picker.'

Consent

Permission for something to happen or agreement to do something.

Cordaid Representative: Cordaid Board, managers, staff, interns, volunteers; consultants providing services for Cordaid, or anyone else in a representative function of Cordaid.

Misconduct

Any behaviour that can reasonably be understood as breaching the standards of behaviour set out in Cordaid's Integrity Framework, Code of Conduct, and related policies.

Perpetrator

The person who commits the misconduct. When speaking about someone who is suspected of having committed misconduct, refer to 'alleged perpetrator.'

Person affected

A person affected by misconduct, e.g., someone who was (sexually) harassed. See also: Survivor/Victim.

Safeguarding

Cordaid's efforts to ensure that staff, operations, and programmes do not harm staff, child, young and adult beneficiaries, or anyone else that comes into contact with Cordaid.

Survivor/Victim

Both terms can be used to describe persons affected by interpersonal misconduct. While some – especially those who have reached a certain state of recovery – might identify as having 'survived' the distressing incident(s), others feel more 'victimised' by them. One option that does not rely on knowing a person's self-identification is to refer to 'persons affected' by misconduct.

Young person

Depending on the context, young people are defined as those aged 15 to 24 or 15 to 35. While young people might face different safeguarding challenges and vulnerabilities than children, those under 18 should be treated in line with the standards for safeguarding children as a precautionary measure.

ANNEX: PSEAH / SAFEGUARDING INCIDENT REPORTING FORM

STRICTLY CONFIDENTIAL

Purpose of this Form:

This form is for reporting any concerns or allegations of interpersonal misconduct, including Sexual Exploitation, Abuse, and Harassment (SEAH), child abuse, bullying, or any other safeguarding-related issue involving Cordaid representatives, partners, or programs.

Instructions:

- Please provide as much information as possible. It is okay if you do not have all the details.
- Your report will be treated with the utmost confidentiality and handled in line with Cordaid's survivor-centred principles and integrity procedures. Information will only be shared on a strict 'need-to-know' basis.
- Do not attempt to investigate the matter yourself. Your responsibility is to report your concerns in good faith.
- Submitting this report will not hurt you. Cordaid prohibits any form of retaliation against those who report concerns.
- If there is an immediate risk to life or safety, please get in touch with local emergency services first.

PART 1: REPORTER'S DETAILS

You can choose to remain anonymous. However, providing contact details allows the investigation team to contact you for more information if needed.

Reporter's Name (Optional):

Contact Information (Email/Phone - Optional) :			
Contact Information (Email/Phone - Optional):			
Are you a Cordaid representative (staff, volunteer, consultant	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
If no, what is your relationship to Cordaid? (e.g., Partner Staff, Beneficiary, Community Member, Other			
Date of this report			

PART 2: DETAILS OF THE PERSON(S) AFFECTED BY THE INCIDENT (SURVIVOR/VICTIM)

Name(s) or description (if name is unknown):

Approximate Age (if known):	<input type="checkbox"/> Child (Under 18)	<input type="checkbox"/> Adult (18+)	<input type="checkbox"/> Unknown	Age
Gender (if known):	<input type="checkbox"/> Female	<input type="checkbox"/> Male	<input type="checkbox"/> Unknown	<input type="checkbox"/> Non-binary
Are they in a vulnerable situation? (e.g., beneficiary, person with disability):				
Are there any immediate needs? (e.g., medical attention, security, psychosocial support):	<input type="checkbox"/> Yes		<input type="checkbox"/> No	

PART 3: DETAILS OF THE SUBJECT OF THE COMPLAINT (ALLEGED PERPETRATOR)

Name(s) and Title/Role (if known):

Organisation (e.g., Cordaid, Partner Organisation Name):			
Is this person in a position of power over the person affected? (e.g., manager, aid provider)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Unsure
Are any other individuals involved? If yes, please list them here:	<input type="checkbox"/> Yes		<input type="checkbox"/> No

PART 4: DETAILS OF THE INCIDENT

Country and Specific Location of Incident:			
Date(s) of Incident(s):			
Approximate Time of Incident(s):			
Is this person in a position of power over the person affected? (e.g., manager, aid provider)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Unsure

Type of Misconduct Alleged (Please check all that apply, based on definitions in the Safeguarding & PSEAH Policy):

- | | |
|---|---|
| <input type="checkbox"/> Sexual Exploitation | <input type="checkbox"/> Discrimination |
| <input type="checkbox"/> Sexual Abuse | <input type="checkbox"/> Misuse of Power or Authority |
| <input type="checkbox"/> Sexual Harassment | <input type="checkbox"/> Inappropriate Relationship |
| <input type="checkbox"/> Child Abuse (Physical, Emotional, Neglect) | <input type="checkbox"/> Other (please specify): |
| <input type="checkbox"/> Bullying or Workplace Harassment | |

Please provide a detailed description of what happened. Please include:

- What you saw, heard, or experienced.
- Who was involved?
- Where and when the incident(s) took place.
- Any other relevant details. *(Use additional pages if necessary)*

PART 5: WITNESSES & EVIDENCE

Did anyone else witness the incident(s)? If yes, please provide their name/role if known.	
Is there any evidence? (e.g., emails, text messages, photos, documents). Please describe it, but do not attach sensitive material unless requested.	
Is anyone else aware of this issue?	

PART 6: ACTIONS TAKEN

Has this been reported to anyone else? (e.g., a manager, the police, another organisation).	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, to whom and when?		
What was the outcome, if any?		

Thank you for taking the time to complete this report. Your action is a critical step in ensuring a safe and respectful environment for everyone.

Please submit this form to the Country Office Integrity Focal Point (in person, by email, or as a handwritten form) or to the Cordaid Integrity & Safeguarding Officer at integrity@cordaid.org. You can also report online at www.cordaid.org/en/reporting-integrity-concerns-and-security-incidents.

CONTACT

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