

Policy 67. Safeguarding Policy and Procedures

1.0 PURPOSE

Greater Fox Cities Area Habitat for Humanity (Fox Cities Habitat) is committed to the highest ethical standards and opposes all forms of exploitation and abuse. This policy aligns with the Ethics Covenant to create and maintain a work environment that is safe, productive, and respectful for colleagues and a response policy in the case of physical or sexual abuse or exploitation, harassment, or bullying of the people in the communities we serve (especially vulnerable adults and children) and the people with whom we work or partner.

Fox Cities Habitat intends that the Safeguarding Policy and Procedures (the Policy) will be reviewed annually by the Risk Management committee and updated as necessary to keep up with changes in applicable law and changes in Fox Cities Habitat operations.

2.0 RELATED REFERENCES

Policy 12. Fox Cities Habitat for Humanity Ethics Covenant

Policy 18. Criminal Background and Sex Offender Registry Check Policy

Policy 71. Harassment, Bullying and Discrimination Policy

Fox Cities Habitat's Employee Handbook: Internet Code of Conduct

Habitat for Humanity International: Safeguarding training for U.S. affiliates

3.0 DEFINITIONS

- A. Child: Anyone who is not yet 18 years old.
- B. Child neglect: When a child's basic needs have consistently not been met to the extent that it has a detrimental effect on the child's health and personal development. These basic needs include food, clothing, shelter and supervision.
- C. Child sexual abuse: When there has been any sexual exploitation of a child. Child sexual abuse includes any actual, attempted or threatened sexual activity involving children.
- D. Emotional abuse: When persistent ill treatment of a person affects their self-esteem. This may include name-calling, rejection, threatening, intimidating or another act that can affect the person's physical and emotional growth and self-esteem.
- E. Habitat representatives: Staff members, board members and key volunteers.
- F. Physical abuse: When a person purposefully injures or threatens to injure anyone. Physical injury may take the form of bruises, cuts, burns or fractures. Physical injuries will not always be visible.
- G. Safeguarding: Preventing and responding to physical or sexual abuse or exploitation, harassment, or bullying of the people in the communities we serve (especially vulnerable adults and children) and the people with whom we work or partner.
- H. Sexual abuse: Any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal power dynamics or otherwise coercive conditions.
- I. Sexual exploitation: Any actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes, including but not limited to profiting monetarily, socially or politically from the sexual exploitation of another.

J. Sexual harassment: Any unwelcome sexual advance, comment, expressed or implied sexual demand, touch, joke, gesture, or any other communication or conduct of a sexual nature (whether verbal, written, or visual).

K. Vulnerable adult: A person age 60 or older with an impaired functional, physical or mental ability to care for oneself or an adult age 18 or older who has a developmental disability and/or requires assisted care.

4.0 SAFEGUARDING COMMITMENTS

Fox Cities Habitat is opposed to any form of discrimination, exploitation and abuse. We seek always to work without bias; to do no harm; and to eliminate (rather than contribute to) the harm of discrimination, exploitation and abuse.

In addition to committing to maintaining the highest standards of conduct and ethical behavior outlined in Policy 12. Code of Conduct, Confidentiality, Ethics, Whistleblower and Conflict of Interest Policy, all Habitat representatives are expected to adhere to Habitat's Safeguarding Behavior Commitments as set forth below. This includes the following general standards of behavior at all times, even when on leave or off duty:

A. Habitat representatives will respect, promote and safeguard the rights and dignities of all people (with particular attention to those we intend to serve, vulnerable adults and children) without discrimination or bullying of any kind.

B. Habitat representatives will never:

1. engage in any form of humiliating, degrading or exploitative behavior toward those we intend to serve in any circumstances.
2. engage in any abuse of authority, position or influence by withholding humanitarian assistance or manipulating selection or targeting processes for those we intend to serve.
3. engage in sexual exploitation or abuse.
4. engage in sexual activity with a child. Mistaken belief in the age of a child is not a defense.
5. exchange money, employment, goods or services (including assistance that is due to those we intend to serve) for sex, sexual favors or other forms of humiliating, degrading or exploitative behavior.
6. engage in a sexual relationship with those we intend to serve since it is based on inherently unequal power dynamics and undermines the credibility and integrity of Habitat's mission.
7. access, possess or circulate pornographic content using Fox Cities Habitat computers, electronic devices, email accounts, electronic distribution lists or an internet connection paid for by Fox cities Habitat. This includes sharing of emails or group texts (including jokes) containing explicit images. Details and expectations are located in the Internet Code of Conduct within Fox Cities Habitat's Employee Handbook.

5.0 CHILD PROTECTION

Fox Cities Habitat complies with state, local, and federal statutes related to child pornography, prostitution, and child labor prohibitions. Fox Cities Habitat strives to be a child-safe organization and reduce the risk of child abuse in all aspects of our operations. We design our programs and execute our mission in alignment with the following standards:

Habitat representatives will:

C. consider child safeguarding in project planning and implementation to determine potential risks to children associated with project activities and operations.

D. work to ensure that personal dignity and respect for children is maintained through all projects, programs and departments.

E. apply measures to reduce the risk of child abuse, exploitation or neglect, including but not limited to:

8. limiting unsupervised interactions with children.

9. prohibiting exposure to pornography.

10. complying with appropriate data responsibility standards regarding photographing, filming and audio recording activities of children.

6.0 SAFEGUARDING OFFICER RESPONSIBILITIES

Fox Cities Habitat designates the Director of Human Resources as the Safeguarding Officer for the organization, responsible for enacting the Safeguarding policy and sharing awareness on the issue of safeguarding.

The Safeguarding Officer will provide annual training for Fox Cities Habitat board members, staff members and volunteers in leadership positions. Such training will also be made available to certain other volunteers as appropriate to their role.

The Safeguarding Officer will follow the appropriate steps, outlined in Section 7.0 below.

7.0 REPORTING AND HANDLING COMPLAINTS

Habitat representatives must report concerns about possible safeguarding misconduct immediately to his or her supervisor or, if suspected by a volunteer, to the staff member supporting the volunteer's work. If for any reason a person finds it difficult to report his or her concerns to a supervisor or staff member supporting the volunteer's work, the person may report the concerns directly to the President/CEO or the Chair of the Board of Directors. Contact information for these people can be found at www.FoxCitiesHabitat.org. The concerns must then be forwarded to the Safeguarding Officer.

The Safeguarding Officer will report concerns as follows:

F. Regular updates to senior leadership and the board of directors on safeguarding allegations and investigations to facilitate effective process oversight.

G. Concerns related to sexual abuse, physical abuse, emotional abuse, sexual exploitation or neglect will be reported to HFHI via Habitat Ethics and Accountability Line at 800-461-9330 or online at heal.habitat.org.

H. Fox Cities Habitat will comply with all relevant requirements related to mandatory report of alleged or confirmed safeguarding misconduct to local authorities.

Additionally, there may be circumstances due to contractual, legal or donor obligations where it is required or appropriate to report such misconduct to external parties such as donors, regulators or other governing bodies.

Fox Cities Habitat's approach for voluntary sharing of this information will be guided by the parallel philosophies of transparency (to donors, regulators and the public) and confidentiality (for the protection of survivors). Wherever possible, information will be presented in a way that protects the survivor's anonymity for confidentiality and safety reasons (except where relevant law might require disclosure).

Failure to report suspected safeguarding misconduct will result in disciplinary action. Concerns will be addressed in accordance with Fox Cities Habitat's Whistleblower policy.

Reported or suspected occurrences of safeguarding misconduct will be promptly and thoroughly investigated. Following an investigation, Fox Cities Habitat will promptly take any necessary and appropriate disciplinary action.

8.0 PROTOCOLS FOR ALLEGED VICTIM ASSISTANCE

Fox Cities Habitat will provide support to alleged victims of safeguarding misconduct. Upon receipt of an allegation, any or all the following forms of assistance that are appropriate and based on the informed consent of the alleged victim will be provided: immediate material care (e.g., direct or funding support for medical care, food or emergency shelter); psychosocial support (e.g., referrals to organizations such as Sexual Assault Crisis Center); or legal and advocacy support (e.g., support to obtain alleged victim advocacy services or legal counseling in order to make an informed decision about whether to pursue legal recourse).

9.0 RECRUITMENT

When recruiting for staff, Fox Cities Habitat will conduct criminal background checks and sexual offender registry checks in accordance with Policy 18. Criminal Background and Sex Offender Registry Check Policy. For positions involving direct contact with those we intend to serve, children or child-related projects) the level of safeguarding responsibilities is clarified and reinforced in the job description and interview process.

Fox Cities Habitat will conduct reference checks on any prospective Habitat employees, board members, or key volunteers who are known to have had previous experience at another Habitat organization by checking with that organization. If Fox Cities Habitat receives such reference check requests, the organization will share any pertinent information of a serious nature relating to safeguarding matters.