General Safeguarding Policy

Effective: October 2026

Purpose

HIAS does not tolerate or condone any form of Abuse, Neglect or Exploitation. Safeguarding is how we protect Program Participants and community members from any form of Exploitation, Abuse, Harassment or Neglect perpetrated by our Associated Personnel. We expect that anyone working in the name of or on behalf of HIAS will treat all Program Participants with dignity and respect and not engage in conduct that is exploitative or abusive. This Policy specifically covers Harm caused by:

- The conduct of Associated Personnel.
- The design and implementation of HIAS' programs and activities, including operations, recruitment, procurement, fundraising and communications.

This policy is designed to complement other HIAS policies, including the Prevention of Sexual Exploitation and Abuse policy, the Safeguarding of Children policy and the Anti-Human Trafficking policy, which will provide specific details and expectations in those areas of abuse prevention and response.

Applicability

This Policy applies globally to all HIAS staff and other personnel, HIAS Partners and certain HIAS Visitors (collectively referred to as "Associated Personnel"). This Policy always applies, including outside working hours.

Following this Policy is mandatory. Non-compliance will lead to disciplinary action, up to and including termination. For HIAS Partners, violation of this Policy or failure to take appropriate corrective action may result in suspension or immediate termination of the partnership agreement and may also result in the party being deemed ineligible for future partnership agreements with HIAS.

HIAS follows the law. If any part of this Policy conflicts with the law, the law must be followed. However, if HIAS' standards for Safeguarding are stricter than the law, then HIAS' standards must be followed.

Policy Statement

HIAS is committed to the prevention of all forms of Abuse, Neglect and Exploitation caused by participation in programming or committed by HIAS Associated Personnel. HIAS will operate in a way that minimizes opportunities for Abuse, Neglect or Exploitation to occur and commits to engaging in responses to concerns in a timely, Survivor-Centered Manner.

Associated Personnel:

- Must treat all Program Participants with dignity and respect, upholding humanitarian principles and promoting the implementation of this Policy.
- May not engage in any unfair treatment, arbitrary distinction or discrimination against Program Participants.

- Prohibition of discrimination should not prevent the design and implementation of needs-based programming. For example, programming may be designed and targeted for a specific population or group without a requirement to offer the same amount of programming for all other populations or groups that do not meet the needs-basis.
- May not harass or bully Program Participants in any way, including verbally, in writing, or through physical conduct.
- Are prohibited from physically assaulting, attacking or abusing Program Participants. Associated Personnel may not use physical discipline/punishment to correct or control Program Participant behavior.
- Must treat Program Participants' personally identifying or financial data with privacy, in line with HIAS' Data Protection Policy.
- May not sell, give away or keep for unapproved use Program Participant data, identity documents or other personally identifiable information.
- May not demand nor accept payment for services, kickbacks or bribes from Program Participants or Community Members, even if the offer was the idea of the Program Participant.
- May not engage in Financial Exploitation or Extortion.
- Any concern, suspicion or witness to a Safeguarding incident by Associated Personnel must be reported immediately via HIAS' reporting mechanisms.
- Failure to report knowledge or a reasonable suspicion or concern of a Safeguarding violation will be subject to disciplinary action, up to and including termination.
- Associated Personnel must cooperate in any investigation when requested.

Managers and Leaders must:

- Promote a culture that prevents abuse and supports this Policy.
- Make sure their teams understand and follow the Policy.
- Take all reports seriously and either personally report concerns via HIAS' reporting mechanisms or ensure staff under their supervision immediately complete reporting responsibilities.
- Protect Whistleblowers from retaliation.
- Ensure staff performance supports a safe and accountable workplace.
- Ensure all members of their team attend proper training.
- Build systems that help to consistently implement this Policy.

HIAS will:

- Design all programs and activities to protect Program Participants from physical, sexual, emotional or financial harm.
- Use strong Safeguarding practices when hiring and managing staff, including relevant and legally obtainable criminal background, reference and Misconduct Disclosure Scheme checks.
- Train all staff on this Policy and their specific responsibilities at hire and annually thereafter.
- Post clear, visible information about this Policy and how to report concerns in all offices and project sites, in relevant languages.
- Assign a Safeguarding focal point in each country office to support staff, raise awareness, and receive reports.
- Inform Program Participants and communities about this Policy and how to report Safeguarding concerns.
- Provide multiple safe, confidential, and accessible ways for people to give feedback or report concerns, as outlined in the Accountability to Affected Populations Guidance. Reports will be escalated quickly to HIAS' General Counsel and the Global Safeguarding Team.

- Include Safeguarding requirements in contracts and agreements with Partners, assess their ability to follow this Policy, and monitor their compliance.
- Follow national laws when working with children and vulnerable adults. If HIAS standards are stricter than local laws, HIAS standards will apply.

Reporting

HIAS requires all Associated Personnel to immediately report any Safeguarding concerns to HIAS' General Counsel by telephone (1-888-559-8518), email (ethics@hias.org) or www.hias.ethicspoint.com. Reports may also be submitted to Safeguarding staff or focal points. Reports may be submitted anonymously.

Any staff reporting concerns or complaints will be protected from any form of retaliation or negative employment consequences, per HIAS' Whistleblowing Policy. Anyone who knowingly gives false information will break this Policy and may face disciplinary action.

HIAS' Global Safeguarding Team and General Counsel will report Safeguarding concerns to the Executive Group. They will also decide if the funder or donor needs to be informed, based on reporting rules. If the concern involves criminal behavior, it will be reported to relevant authorities, while considering the survivor's safety, security, and preferences.

Investigations

HIAS will carry out independent, confidential, and Survivor-Centered investigations by trained investigators designated by the Global Safeguarding Team, including contracting with external investigators as needed. Individual staff members and offices should not carry out investigations or engage investigators separate from the official HIAS investigation efforts. Assigned investigators will recognize the rights and interests of everyone involved, including the person making the report and survivor (if different from the reporter), witnesses, and subject of complaint. Investigations will be carried out according to HIAS' Standard Operating Procedures for Dealing with Safeguarding Concerns. HIAS will follow any required funder reporting expectations in consultation with the Office of General Counsel.

Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with Safeguarding concerns. Information relating to the concern and subsequent case management will be shared only on a need-to-know basis and will be always kept secure. This includes Executive and Country leadership, who will receive high level information about allegations and investigations, with additional information shared as necessary to the effective leadership and governance of an office or the organization. Human Resources, Office of General Counsel and Safeguarding staff are engaged in the investigation process and generally have access to case details unless a conflict of interest exists where a staff member would be excluded from participation in an investigation. Implicated staff and their supervisors will be informed of investigations at an appropriate time and will have an opportunity to respond to the allegations, in line with Survivor-Centered and safety practices.

Where a law, rule or regulation, such as the European Union General Data Protection Regulation (GDPR), governs a person's access to information, HIAS will comply with that law, rule, or regulation while also keeping information related to the concern confidential.

Associated Policies

- HIAS Code of Conduct
- HIAS Whistleblowing Policy
- HIAS Safeguarding of Children Policy
- HIAS Anti-Human Trafficking
- HIAS Prevention of Sexual Exploitation and Abuse Policy
- HIAS Data Protection Policy

Changes and Updates to this Policy

HIAS reserves the right to make changes and updates to this Policy as required. If modified, the Policy will be communicated to all HIAS Associated Personnel and posted on HIASNet, indicating the date of the latest revision.

HIAS Personnel Safeguarding Certification Form

- I confirm that I've received and read the HIAS Safeguarding Policy. I understand what it says and agree to follow all its rules.
- I will report any possible or actual violations of this Policy or related procedures.
- I understand it's my responsibility to ask questions if anything in the Policy is unclear, and I've had the chance to do so.
- I understand that if I break this Policy, fail to report a violation I know about, or intentionally hide a violation, I may face disciplinary action. This could include losing my job or contract with HIAS, and HIAS may take legal action against me.
- I also understand that violations may lead to criminal or civil penalties under the law, which HIAS may choose to pursue.
- I agree to sign this Policy when I start working with HIAS and again annually.

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Print Name Position or Affiliation with HIAS

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APPENDIX A: Glossary of Terms

Associated Personnel refer to all HIAS Staff and Other Personnel, HIAS Partners and certain HIAS Visitors. Associated Personnel are covered by this Policy and are subject to Policy requirements.

Bullying is behavior that hurts, scares, or insults someone, whether or not it's related to their identity or background. It often involves misusing power and can happen repeatedly or just once. Bullying can be obvious or subtle and may occur in person or through phone, email, social media, or other digital means. Examples of bullying include:

- Yelling or using offensive language
- Constant unfair or harsh criticism
- Embarrassing or mocking someone in public
- Purposely leaving someone out of activities
- Spreading harmful or false rumors
- Threatening or physically attacking someone

Child is any person below the age of 18 - *UN Convention on the Rights of the Child, Article 1*.

Community Member is a person living in proximity to HIAS programming who may come into contact with Associated Personnel representing HIAS, regardless of their involvement in the program. Note that this Policy also covers exploitation and abuse caused by HIAS in the wider community where our programs are taking place.

Discrimination is any unfair treatment or arbitrary distinction based on a person's membership in or affiliation with a protected group, which may include, but is not limited to: race, color, ethnicity, national origin or ancestry, citizenship, caste, tribal affiliation, religion, creed, sex, sexual orientation or age. It also includes unfair treatment or arbitrary distinction based on a protected status or characteristic, including, but not limited to: domestic partnership, familial status, caregiver status, socio-economic status, or victim of gender-based violence, pregnancy, lactation, childbirth or related medical conditions; gender expression or identity, physical or mental disability, neurodiversity, genetic information (including testing), or any other status protected by federal, state or local law.

Extortion: The obtaining of property from another induced by wrongful use of actual or threatened force, violence, or fear, or under pretense of official right.

Financial Exploitation is the misuse of a person's funds through theft, force or coercion. This can include demanding bribes, extortion, fraud or misrepresentation, such as promises of additional or expedited benefits in exchange for payment.

Harassment is unwanted conduct affecting the dignity of individuals based on any protected status, including but not limited to the characteristics mentioned in the "Discrimination" section above. Harassment is conduct reasonably perceived as demeaning and unacceptable by the recipient undertaken with the purpose or effect of creating an intimidating, humiliating, or offensive environment. It also includes, but is not limited to:

- Verbal conduct including taunting, jokes, threats, epithets, derogatory comments or slurs based on an individual's protected status.
- Visual and/or written conduct, including derogatory posters, photographs, calendars, cartoons, drawings, websites, emails, text messages, or gestures based on an individual's protected status.

- Physical conduct, including assault, unwanted touching or blocking regular movement because of an individual's protected status.

Harm is physical, sexual, or emotional abuse; neglect; or exploitation and other conduct that causes or creates an injury to an individual's physical safety, mental health, dignity, or substantial interference with an individual's legally protected rights.

HIAS Partners refers to external parties in association (contractual or non-contractual) with HIAS such as HIAS' partners, affiliates, sub-recipients, suppliers, and vendors, working for or receiving funding from HIAS.

HIAS Staff and Other Personnel is (a) permanent, fixed term, and temporary staff; (b) board members; (c) outside consultants, independent contractors, and sub-contractors; (d) third-party representatives and agents; and (e) volunteers, community workers, interns and public service or fellows who conduct work on behalf of HIAS.

HIAS Visitor refers to visitors or guests at HIAS programs, programmatic sites or offices invited to HIAS locations or acting in an official capacity with HIAS program participants that are not otherwise covered by mutual agreements (such as UNHCR representatives) handled by contract or at the global level.

Misconduct Disclosure Scheme is an interagency agreement to systematically request and share information on substantiated allegations or ongoing investigations of sexual exploitation, abuse, and harassment (SEAH) during the recruitment process.

Program Participant is someone who directly receives goods or services from HIAS' program(s). In some locations or programs a program participant may be referred to as a participant, client, beneficiary or beneficiary of services.

Safeguarding is the measures put in place by organizations to prevent, identify and respond to harm that may be caused by inappropriate sexual activity, abuse or exploitation, or other exploitative or abusive conduct. It is the organization's responsibility to make sure their staff, operations and programs "do no harm" to anyone that comes in contact with the organization, especially children and vulnerable adults, and to not expose them to the risk of or actual harm and abuse - *Keeping Children Safe* (adapted).

Survivor-Centered Approach: HIAS is committed to responding to all reports of conduct that violate this Policy with a survivor-centered approach. This means that the safety, dignity, and well-being of the survivor are the primary considerations in all steps that HIAS takes in responding to Safeguarding concerns and in taking precautions to minimize any additional harm to the survivor. HIAS will seek to ensure that survivors are referred to medical, psychosocial, legal, and safety support services, as appropriate and available, and according to the survivor's specific needs and wishes. HIAS will assist survivors with reporting incidents to the proper authorities should they so choose.

Vulnerable Adult is a person who is, or may be, in need of care by reason of mental, physical, emotional, psychological, or other disability; age, sex, gender, sexual orientation, gender identity, or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. - *UK Government Department of Health* (abridged). Note: Due to issues of poverty, marginalization, relative lack of power, and lack of access, program participants served by HIAS programs are considered vulnerable.

Whistleblower is a person who reports a reasonable belief that one or more HIAS Associated Personnel has violated a law, rule, regulation or HIAS policy. This person can expect to be protected from retaliation when making a report, in line with HIAS' Whistleblowing Policy.

Zero Tolerance is the organization's responsibility to adequately respond to any concerns of violations of this Policy. This includes the obligation to report any knowledge, suspicion, or concern about a Safeguarding violation, the responsibility to investigate any concerns that are brought to our attention, and, in the case of substantiated allegations, to respond with adequate remedial and corrective measures, including through disciplinary action, up to and including termination of employment or a third-party agreement.