NUTRITION INTERNATIONAL

Nourish Life

Safeguarding policy

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This policy has been approved in its entirety and must not be modified or customized without the express authorization of the individual listed at the top of this policy.

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1. Introduction

Nutrition International recognizes the power dynamics inherent in working with children and adults living in vulnerable situations, and the potential for abuse and exploitation by staff, consultants, partners, and any other person authorized to act on behalf of Nutrition International. Nutrition International fully acknowledges its duty of care to protect and promote the welfare of the children and adults it comes into contact with through its operations and programs, and recognizes the rights of children and adults to protection regardless of race, gender, religion, sexual orientation, age, ability, or beliefs.

1.1 What is safeguarding?

At Nutrition International, safeguarding refers to the measures the organization takes to protect people — including staff, volunteers, partners and service users — from harm, abuse, exploitation, neglect and mistreatment of any kind. This includes ensuring a safe and respectful workplace for staff (internal safeguarding), and embedding safeguarding within programs, research and service delivery to prevent harm to those Nutrition International serves (external safeguarding). Effective safeguarding requires a survivor-centred approach, clear reporting mechanisms, accountability at all levels, and a commitment to continuously strengthening safeguarding practices.

Safeguarding measures seek to prevent situations where individuals can use their position of power to abuse or exploit another person. This includes protection from sexual exploitation, abuse and sexual harassment (PSEAH) by staff and associated personnel, as well as safeguarding risks caused by program design and implementation.

2. Purpose

The purpose of this Safeguarding Policy and its related procedures is to ensure that:

- All individuals — particularly children, adults in vulnerable situations and program participants — are protected from harm resulting from their engagement with Nutrition International's programs, operations or personnel. This includes harm arising from the conduct of Nutrition International staff, associated personnel or partners, and from uncontrolled or unmitigated risks inherent in program or activity design and implementation;
- Nutrition International representatives are aware of their obligation to comply with this Safeguarding Policy;
- Nutrition International representatives understand their responsibility to report any safeguarding concerns;
- Nutrition International representatives have access to clear guidelines on how to report suspected breaches of this Safeguarding Policy;
- Nutrition International representatives understand their responsibility to uphold the highest standards of personal and professional conduct in all aspects of their work at Nutrition International;
- Nutrition International representatives understand the consequences of breaching this Safeguarding Policy; and
- Program participants are aware of Nutrition International's responsibility to prevent and respond to any harm against them arising from the actions and behaviours of Nutrition International representatives, and of the mechanisms available for reporting such incidents.

3. Policy statement

Nutrition International's vision is "a world where everyone, everywhere, is free from all forms of malnutrition and able to reach their full potential". Its mission is "to serve as an expert ally to governments and organizations by bringing together evidence to action at scale to eliminate malnutrition." In fulfilling its vision and mission, Nutrition International is committed to upholding its organizational values and maintaining the highest standards of professional and personal conduct in all aspects of its work. Nutrition International's values emphasize respect for the dignity of every individual and relationships grounded in mutual respect, regardless of race, gender, religion, sexual orientation, age, ability, beliefs or family status.

Nutrition International's Safeguarding Policy sets out clear expectations that personal and professional behaviour must always reflect the organization's values and uphold the highest standards. Nutrition International condemns all forms of abuse and exploitation, including sexual exploitation and abuse, and will not tolerate such behaviour in any form. Nutrition International commits to zero tolerance of inaction where such harm is caused, and will work only with partners, vendors and service providers who share these values and demonstrate strong vigilance in preventing and addressing harassment, abuse, exploitation and trafficking.

Nutrition International is committed to creating an environment that prevents abuse and exploitation, and maintains procedures for safe recruitment, safeguarding, conduct, and mechanisms for raising and responding to concerns.

4. Policy scope

This policy applies in all countries and contexts where Nutrition International operates, and covers every individual or group engaged in, associated with, or affected by Nutrition International's work, including:

- All Nutrition International employees, consultants, interns, volunteers, board members and visitors;
- All implementing partners, suppliers and contractors; and
- All program participants, community members and stakeholders who interact with Nutrition International's programs and operations.

The policy sets out how safeguarding concerns or allegations will be identified, reported and addressed. Nutrition International addresses safeguarding across three core domains: child safeguarding; adult safeguarding; and protection from sexual exploitation, abuse and sexual harassment (PSEAH). These core domains are governed by related policies and procedures (see Section 18).

Safeguarding is integrated across Nutrition International's work through three pillars: **prevention, reporting and response.**

This policy does not cover safeguarding concerns in the wider community, unless they involve Nutrition International staff, representatives or partners.

5. Legal compliance

Nutrition International's safeguarding practices are guided by internationally recognized standards, including the UN Convention on the Rights of the Child; the UN Secretary-General's Bulletin on special measures for protection from sexual exploitation and sexual abuse; the IASC (Inter-Agency Standing Committee) Minimum Operating Standards for Protection from Sexual Exploitation and Abuse; the Core Humanitarian Standard (CHS) on Quality and Accountability; and other relevant human rights conventions.

Nutrition International complies with all relevant child and adult protection legislation in Canada, including the Criminal Code of Canada.

Nutrition International works in a variety of geographical locations where significant variation exists in legislation, understandings and arrangements for safeguarding. Where this policy and local legislation address the same matter, whichever standard provides the greater protection for children and adults applies, and Nutrition International will at all times comply with the mandatory requirements of local law. Guidance on resolving any conflict is available from the Global Safeguarding Lead.

6. Risk statement

Nutrition International proactively seeks to prevent harm, or the risk of harm, to children and adults resulting from exposure to its programs, operations or people. Given the significant threats and challenges worldwide, risk awareness and management are crucial elements of Nutrition International's approach to good governance and the effective delivery of its objectives.

This policy reduces the likelihood of such risks by establishing clear prevention measures, strengthening reporting mechanisms, and ensuring a consistent and appropriate response to any safeguarding incident. Safeguarding incidents can have high organizational impact, including serious reputational damage and financial implications, underscoring the need for strong safeguarding systems, staff awareness, partner compliance and continuous improvement in safeguarding practice.

7. Responsibilities

Safeguarding is a shared responsibility across the entire organization. While every Nutrition International representative has a duty to help create a safe environment, certain roles carry specific responsibilities to ensure the effective implementation of safeguarding across Nutrition International's operations.

All Nutrition International staff, associates and visitors are responsible for:

- Complying with this Safeguarding Policy, including the Safeguarding Code of Conduct;
- Committing and contributing to an environment where children and adults feel respected, supported, safe and protected;
- Avoiding any action or behaviour that results in violence against a child or adult, or places a child or program participant at risk of violence;
- Being aware of and adhering to the provisions of this Safeguarding Policy; and
- Confidentially reporting any concern, rumour, suspicion or allegation of harm, violence and/or breach of this policy immediately (and in any event within 24 hours), using the relevant and/or country-specific procedures.

Nutrition International's Board of Directors is responsible for:

- Establishing organizational culture and being accountable for safeguarding management and implementation;
- Providing oversight of safeguarding as a key organizational risk, including ultimate approval of safeguarding policies;
- Reviewing safeguarding performance and risk reporting;
- Overseeing management's response to significant safeguarding incidents, serving as a point of escalation, and being kept informed of all safeguarding incidents and concerns;
- Mandating the Finance and Audit Committee (FACC), in line with its risk and audit mandate, or designated individual Board Members, to provide oversight of safeguarding; and
- Ensuring individual Board Members comply with this Safeguarding Policy when engaging with children and program participants.

Nutrition International's Finance and Audit Committee (FACC) is responsible for:

- Reviewing this Safeguarding Policy and any revisions to it, and recommending them to the Board for approval, in line with the FACC's risk and audit mandate; and
- Supporting the Board's oversight of safeguarding as a key organizational risk.

Nutrition International's President and Chief Executive Officer (President and CEO) is responsible for:

- Establishing organizational culture;
- Being accountable for the effectiveness of the safeguarding framework, with oversight provided by the Board; and
- Approving this Safeguarding Policy and any revisions to it by sign-off, and submitting the policy to the Finance and Audit Committee (FACC) for its recommendation to the Board.

Nutrition International's Executive Management Committee (EMC) is responsible for:

- Recommending this Safeguarding Policy and any revisions to it to the President and CEO for approval by sign-off, prior to submission to the Finance and Audit Committee (FACC) and the Board;
- Setting the tone at the top by providing a supportive environment that promotes compliance with this Safeguarding Policy by Nutrition International associates (other than Board Members) and visitors;
- Ensuring the implementation and monitoring of this Safeguarding Policy for associates (other than Board Members) and visitors;
- Ensuring that all breaches or suspected breaches of this Safeguarding Policy involving associates (other than Board Members) and visitors are investigated, documented and retained; and
- Ensuring that Nutrition International has procedures in place that are consistent with this Safeguarding Policy.

The Global Safeguarding Lead is responsible for:

- Developing the Global Safeguarding Framework;
- Creating annual global safeguarding plans;
- Aligning policies with international standards; and
- Leading the Safeguarding Working Group to evaluate and update guidelines.

The Safeguarding Working Group (SG WG) is responsible for:

The Safeguarding Working Group is a multi-disciplinary team responsible for implementing the Safeguarding Annual Work Plan, as endorsed by EMC sponsors. This includes developing, implementing and evaluating Nutrition International's Safeguarding Framework. Specifically, the SG WG is responsible for:

- Supporting the Global Safeguarding Lead by providing cross-departmental guidance and support on organization-wide safeguarding initiatives;
- Endorsing and monitoring the Safeguarding Framework to guide organizational practice;
- Creating and implementing an annual work plan outlining actions to strengthen capacity, policy and strategy;
- Defining and monitoring safeguarding KPIs for Nutrition International, tracking progress semi-annually and sharing findings with all staff as part of the Corporate Accountability Framework;

- Providing safeguarding stewardship by serving as safeguarding ambassadors, ensuring that safeguarding considerations are systematically embedded in Nutrition International's strategic and organizational planning processes and aligned with the Safeguarding Framework; and
- Engaging in Nutrition International's Safeguarding Community of Practice and actively participating in safeguarding events and initiatives led by the Global Safeguarding Lead.

Safeguarding Focal Points support the Global Safeguarding Lead by:

- Coordinating safeguarding activities;
- Acting as a safeguarding contact point for staff, advising them on any concerns, and preventing and responding to abuse and exploitation by receiving and forwarding concerns;
- Raising awareness and promoting best practice;
- Supporting senior management to meet their safeguarding-related responsibilities; and
- Ensuring that Nutrition International stays informed about sector best practice and legislative change.

Regional and Country Directors are responsible for ensuring that safeguarding is embedded and consistently applied within their teams, countries and regions, by:

- Implementing the Safeguarding Policy and systems within their group, region, country or team as applicable, with Country Directors overseeing progress in safeguarding work with partners;
- Ensuring a focal person or persons for safeguarding is in place for each location where Nutrition International works, and communicating to staff who this individual or individuals are;
- Ensuring systems are in place to identify and mitigate potential safeguarding risks, with staff undertaking thorough and systematized safeguarding risk analysis for relevant activities (for example, fundraising activities, advocacy initiatives and projects) and creating action plans to minimize risk; and
- Communicating safeguarding messages to staff, organizational representatives, program participants, beneficiaries and communities.

Managers and supervisors are responsible for:

- Fostering a culture of compliance and ethics, ensuring all team members understand and adhere to the Code of Conduct and safeguarding obligations;
- Implementing safeguarding policies and systems within their area;
- Ensuring systems are in place to identify and mitigate any potential safeguarding risks; and
- Communicating safeguarding messages to staff, organizational representatives, program participants, beneficiaries and communities.

MEL and program staff are responsible for:

- Integrating safeguarding into project design, monitoring and reporting; and
- Conducting project-level safeguarding risk assessments and ensuring "do no harm" to children and adults.

The People and Culture (P&C) Unit is responsible for:

- Supporting safeguarding in recruitment, performance and disciplinary processes;
- Ensuring that all employees complete and submit safeguarding and Code of Conduct induction prior to commencing employment, and undertake regular refresher training thereafter;

- Retaining safeguarding and Code of Conduct training records and signatures in employee personnel files;
- Implementing safe recruitment and ongoing employment or engagement with Nutrition International;
- Supporting the Global Safeguarding Lead in training employees on this Safeguarding Policy;
- Supporting the Global Safeguarding Lead in investigating breaches or suspected breaches of this Safeguarding Policy and determining appropriate disciplinary action; and
- Ensuring that job-specific safeguarding responsibilities are accurately reflected in job descriptions, and reviewed and evaluated within the performance management process against clear standards and KPIs.

Organizations that work with Nutrition International

Organizations that work with Nutrition International in carrying out its programs, projects, processes, events and/or activities involving children and program participants must comply with Nutrition International's Safeguarding Guidelines.

8. Definitions

Nutrition International representative: Any individual affiliated with Nutrition International or a Nutrition International subsidiary or affiliate organization, including employees, seconded employees, temporary and casual workers, local and international collaborators, volunteers, independent contractors, consultants, interns and visitors.

Child: An individual below the age of 18, in line with the United Nations Convention on the Rights of the Child (UNCRC).

Abuse: Any action or inaction that causes harm to another person. This includes physical abuse, emotional abuse, sexual abuse and neglect, including child labour or other exploitation. Abuse may also occur online and/or through mobile technology, resulting in actual or potential harm to a child's or adult's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

Grooming: Building an emotional connection with a child or an adult in a vulnerable situation to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Many children and adults in vulnerable situations may not understand that they have been groomed, or that what has happened to them is abuse.

Exploitation: Any actual or attempted abuse of a position of vulnerability, differential power or trust to profit monetarily, socially or politically. It includes sexual exploitation.

Commercial exploitation: Exploiting a child in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, or moral or social-emotional development. It includes, but is not limited to, child labour.

Complainant: The person who reports the concern or allegation. This may not be the same person as the survivor.

Physical abuse: Actual or potential physical harm perpetrated by another person, adult or child. It may involve hitting, shaking, poisoning, drowning or burning. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Neglect and negligent treatment: A persistent failure to meet a vulnerable child's or adult's basic physical and/or psychological needs, taking into account context, resources and circumstances. Neglect may result in serious impairment of healthy physical, spiritual, moral or mental development, including failure to provide culturally accepted conditions for wellbeing, supervision, protection, nutrition, shelter, or safe living and working conditions.

Discriminatory abuse: Abuse based on an individual's race, gender, disability, faith, sexual orientation or age, or other forms of harassment, slurs or hate crimes and incidents.

Emotional abuse: Persistent emotional maltreatment affecting a child's emotional development or an adult's mental health. Examples include restricting movement, degrading, humiliating, bullying (including cyberbullying), threatening, discriminating, scaring, ridiculing, or other non-physical forms of hostile or rejecting treatment.

Harmful traditional practices: Forms of violence based on long-established cultural practices, primarily committed against women and girls. Examples include female genital mutilation, child marriage, forced marriage, "honour"-based violence, female infanticide and dowry price.

Program participants: Individuals who are direct or indirect recipients of Nutrition International's programs or services. Nutrition International recognizes that program participants are inherently vulnerable and at risk due to the nature of its services and the areas in which it operates.

Safeguarding: Measures taken by Nutrition International to protect people — including staff, volunteers, partners and service users — from harm, abuse, exploitation, neglect and mistreatment of any kind. Safeguarding includes maintaining a safe and respectful workplace for staff (internal safeguarding), and embedding safeguarding within programs, research and service delivery to prevent harm to those Nutrition International serves (external safeguarding). Effective safeguarding requires a survivor-centred approach, clear reporting mechanisms, accountability at all levels and continuous improvement.

Safeguarding measures: Actions aimed at preventing individuals from using their position of power to abuse or exploit another person. This includes protection from sexual exploitation, abuse and sexual harassment (PSEAH) by staff and associated personnel, as well as safeguarding risks caused by program design and implementation.

Safeguarding misconduct: Behaviour ranging from physical, emotional or sexual abuse to neglect, insufficient supervision, trafficking, or commercial, transactional or labour exploitation, including online harm, resulting in actual or potential harm to children or adults.

Safeguarding concern or allegation: A suspicion or allegation that a breach of this Safeguarding Policy has occurred, or may be at risk of occurring. This includes disclosures by children and adults.

Survivor / victim: The person alleged to have been subjected to abuse or exploitation. "Survivor" implies strength and resilience. "Victim" refers to the person affected by the alleged perpetrator's actions, without negating dignity or agency.

Sexual abuse: Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes unwanted sexual activity or behaviour occurring without consent or understanding. Activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. Sexual abuse also includes non-contact activities, such as involving the individual in viewing or producing pornographic materials, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse, including via the internet.

Sexual exploitation: Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including threatening or profiting monetarily, socially or politically from the sexual exploitation of another. This form of sexual abuse involves children or adults in vulnerable situations engaging in sexual activity in exchange for money, gifts, food, accommodation, affection, status or other necessities. These abusive relationships involve a power imbalance that limits the survivor's options, and can be misunderstood by children and adults living in vulnerable situations as consensual.

Sexual harassment: A form of harassment involving unacceptable and unwelcome behaviours and practices of a sexual nature, which may include sexual suggestions or demands, requests for sexual favours, and sexual verbal or physical conduct or gestures that are, or might reasonably be perceived as, offensive or humiliating. Examples include unwelcome physical contact, sexual comments, inappropriate SMS or messaging-platform messages, social media postings, promises in return for sexual favours, and displaying sexually graphic images. Even if unwanted conduct is not intended to cause distress, it can still have the effect of violating a person's dignity or creating an offensive environment. Sexual harassment has widely been understood to relate to the workplace, but is also included in the spectrum of behaviours that are not acceptable conduct by Nutrition International representatives with children and program participants.

Trafficking: The recruitment, transportation, transfer, harbouring or receipt of persons by means of threat, use of force, other forms of coercion, abduction, fraud, deception, the abuse of power or a position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

Adult in a vulnerable situation: Any adult (a person aged 18 or over), including Nutrition International staff and volunteers, who may be subject to harm or exploitation based on their age, gender, sexual orientation, health, social or economic status, or relationships of dependency or hierarchy. Specific vulnerability ("at risk") applies to those who are, or may be, in need of community care services due to mental or other disability, age or illness, and who are, or may be, unable to take care of themselves or protect themselves from the risk or experience of abuse or neglect.

Board of Directors (Board): Nutrition International's governing body, which holds final approval authority for this Safeguarding Policy and provides oversight of safeguarding as a key organizational risk.

Finance and Audit Committee (FACC): The committee of the Board that, in line with its risk and audit mandate, reviews this Safeguarding Policy and recommends it to the Board for approval.

President and Chief Executive Officer (President and CEO): Nutrition International's most senior executive, accountable for the effectiveness of the safeguarding framework and responsible for approving this Safeguarding Policy by sign-off before its submission to the FACC and the Board.

Executive Management Committee (EMC): Nutrition International's senior leadership body, responsible for recommending this Safeguarding Policy to the President and CEO and for ensuring the policy's implementation and monitoring.

Global Safeguarding Lead: The staff member responsible for developing the Global Safeguarding Framework, leading the Safeguarding Working Group, monitoring compliance with this policy and providing organization-wide safeguarding guidance.

Safeguarding Working Group (SG WG): The multi-disciplinary team responsible for implementing the Safeguarding Annual Work Plan and for developing, implementing and evaluating Nutrition International's Safeguarding Framework.

Safeguarding Case Management Committee: The committee convened within 24 hours of receipt of a safeguarding concern or allegation to assess it and determine the response. It consists of the Global Safeguarding Lead; the Senior Programs Director; the Senior Director, People and Culture; and the Country Director, Regional Director or Senior Manager for the location where the concern was reported.

Safeguarding Focal Point: A designated staff member in each location where Nutrition International works who acts as the safeguarding contact point for staff, receives and forwards concerns, and supports local implementation of this policy.

9. Key safeguarding principles

Nutrition International recognizes the importance of partners, parents, families and other caregivers, and of working in partnership with these stakeholders to safeguard program participants and children. Decisions and actions in response to safeguarding concerns and breaches of this policy will be guided by the principle of the best interests of the child or adult. Nutrition International is responsible for ensuring that safeguarding is mainstreamed into everything it does, applying the following key principles.

- **Open and accountable.** Nutrition International commits to openness, transparency and accountability in safeguarding. Leaders are responsible for fostering safe, inclusive and equitable environments, while ensuring everyone understands their safeguarding roles and responsibilities, including reporting. Information on this Safeguarding Policy is shared with all program participants, children, community members, staff, associates and visitors, so that individuals understand their rights and how to report concerns. To remain accountable, Nutrition International ensures that safeguarding concerns can be raised and discussed, that poor practice and inappropriate behaviour are challenged and addressed, and that safeguarding measures are regularly reviewed and strengthened.
- **Do no harm.** Nutrition International is committed to ensuring that no child, community member, staff member or partner is harmed — directly or indirectly — through contact with its programs or operations.
- **Shared responsibility.** Safeguarding at Nutrition International is a shared responsibility across all staff, representatives and partners. Everyone is expected to help create a safe, dignified and inclusive environment, and to act on any actual or suspected safeguarding concern or risk of harm. Partners are required to meet minimum safeguarding standards, with support from Nutrition International where needed. All concerns and allegations raised are treated seriously and handled with sensitivity and respect.
- **Survivor-centred approach.** Nutrition International applies a survivor-centred approach to safeguarding, prioritizing the best interests of the survivor in all cases. The organization commits to providing appropriate support in response to concerns or allegations, guided by the survivor's safety, rights, needs, wishes and empowerment, while ensuring fairness for all parties. It upholds survivors' privacy and dignity through confidentiality, respectful treatment, meaningful involvement in decisions where appropriate, clear information sharing, and access to referrals and assistance to support recovery and safety.
- **Zero tolerance of inaction.** Nutrition International is committed to following up all reported concerns or allegations of breaches of this Safeguarding Policy or the Code of Conduct, and to holding perpetrators accountable. This zero-tolerance approach applies to those who perpetrate safeguarding misconduct, those who fail to report allegations, and those who retaliate against anyone who reports a complaint or participates in an investigation.
- **Equality and inclusion.** Nutrition International acknowledges that safeguarding risks are driven by power imbalances and intersecting gender and social inequalities present across all working contexts. Recognizing that its work may unintentionally reinforce unequal power dynamics, the organization adopts an intersectional approach to safeguarding to understand how multiple identities affect vulnerability to harm. It commits to promoting equality and equity by empowering and including victims and survivors in response processes to enhance their safety and protection.

10. Prevention measures: safeguarding behaviour protocols

The following safeguarding behaviour protocols form the foundation of Nutrition International's safeguarding approach.

10.1 Disciplinary action

Failure to follow these safeguarding behaviour protocols or any other part of this Safeguarding Policy, other inappropriate behaviour toward children or adult program participants, or failure to report a known, suspected, alleged or witnessed safeguarding incident committed by a Nutrition International representative, is grounds for disciplinary action. This may include termination of employment or other affiliation with Nutrition International, termination of contracts, and onward reporting to authorities as appropriate.

10.2 Required behaviours

Nutrition International representatives must:

- Contribute to creating and maintaining an environment that prevents violence, abuse and exploitation of children and program participants;
- Display high standards of professional behaviour at all times, ensuring that their personal and professional conduct is, and is seen to be, of the highest standard in line with Nutrition International's values, and does not bring the organization into disrepute;
- Treat children and program participants in a manner that respects their rights, integrity and dignity, and considers their best interests, regardless of age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, or any history of conflict with the law;
- Act in line with all relevant health, safety and security guidelines, and work proactively to safeguard others;
- Ensure that contact with children and adults in vulnerable situations — whether in person, online or by phone — is supervised, accompanied, or within sight of another adult, recognizing that in rare situations where this is not possible, staff must inform their line manager as soon as possible;
- Empower children and adults to express concerns about behaviour they find uncomfortable, and ensure they know how to report concerns;
- Be aware of their own behaviour and avoid any action that may be perceived by others as child exploitation or abuse;
- Report any concern or suspicion regarding safeguarding violations or policy non-compliance in accordance with Nutrition International procedures; and
- Cooperate fully and confidentially in any Nutrition International investigation of concerns or allegations of abuse of children or program participants.

10.3 Prohibited behaviours

Nutrition International representatives must not:

- Condone or participate in behaviour of children or program participants that is illegal, unsafe or abusive;
- Misuse their position of authority for personal gain — whether economic, professional or sexual — or solicit or accept bribes, gifts, favours or other improper benefits;
- Enter into a sexual relationship with any member of a community or partner organization that Nutrition International assists where there is a position of power or authority. Any sexual relationship that could potentially be perceived as an abuse of power or authority must be declared to the individual's manager, People and Culture contact, or another Nutrition International manager;

- Exchange money, employment, goods or services for sexual activity, including any exchange of assistance that is due to program participants;
- Engage in any type of sexual relationship with a person under the age of 18, or under the local age of sexual consent where that age is higher. This applies to all Nutrition International representatives, regardless of local age of consent laws or any mistaken belief about a child's age. Any disclosure confirming a breach will result in withdrawal of a job offer or, if discovered later, may result in termination of contract;
- Show differential or preferential treatment to, or favour, any child or program participant to the detriment of them or others;
- Use any form of physical punishment or discipline, of any degree, or any form of physical force toward children and program participants (even where culturally acceptable). Only non-violent methods are permitted to manage children's behaviour, both within and outside of the workplace;
- Perform personal tasks for a child or program participant that the individual can do independently (for example, toileting, bathing or dressing);
- Hire children for domestic or other labour that is inappropriate for their age or developmental stage, interferes with their education or recreation, or places them at significant risk of injury. Representatives must comply with all relevant international standards and local legislation in relation to child labour;
- Engage in any form of human trafficking;
- Seek to make contact or spend time with any child they come into contact with as part of their work with Nutrition International, outside of designated role-related activities;
- Sleep in the same room or bed as a program participant, or a child encountered in a work-related context, unless absolutely necessary; in such cases, supervisor approval must be obtained and another adult present where possible (this does not apply to an individual's own children);
- Allow a program participant, or a child encountered in a work-related context, to stay overnight at their home or any other personal residence or accommodation;
- Act in ways that shame, humiliate, belittle or degrade children or program participants, or otherwise perpetrate any form of emotional abuse;
- Use language or behave towards a child or program participant in a way that is inappropriate, offensive, abusive, sexually provocative, demeaning or culturally inappropriate; or
- Use technology — including computers, mobile phones, cameras or social media — to exploit or harass children or program participants.

This list is not exhaustive. Staff, representatives and visitors must use good judgement to avoid any behaviour that could put children or program participants at risk.

11. Prevention measures: safe children and young people participation

Nutrition International is committed to ensuring that children (under 18 years of age) and young people (aged 18 to 24) are protected and empowered as they participate in its programs. Child participation is when children contribute to decisions and act on issues that affect their lives. Nutrition International implements adolescent health and nutrition programs in various countries and ensures that engagement with children and young people — in schools, community platforms or workplaces, whether directly or through partners — is safe, applying the "do no harm" and "best interests of the child" principles.

Everyone is responsible for keeping children safe while they participate in activities promoted by Nutrition International. The following will be adhered to:

- Before encouraging children's or young people's participation in a program or activity, assess and mitigate the associated risks by conducting a child participation risk assessment;
- Actively engage children in this assessment where possible. Ask for their ideas and solutions, listen to any concerns and safety issues raised, and follow up as appropriate;
- Obtain informed consent for child participation from children and their parents or caregivers. Ensure participants understand the purpose, benefits, risks, time commitments, expectations, expected outcomes, and their right to withdraw at any time. Clearly explain the intended purpose of photographs, videos or interviews, including who may access them, where they will be shared, and how long they will remain available. Children should also be informed that they can request to remain anonymous in any media taken of them. The Child Participation Consent Form must be completed as appropriate and kept on file;
- Ensure informed consent in research activities, including explaining data collection methods, topics covered, intended use of information, confidentiality measures, and participants' rights to refuse to answer any question, seek clarification, or withdraw at any time. Consent is a negotiable and ongoing process;
- Obtain consent from both the child and the parent or caregiver (or other legally authorized entity or individual). Where written consent is not appropriate, safe or feasible, obtain verbal consent. When discussing sensitive issues, consent includes information about what might be done if a child discloses information about ongoing or potential abuse — for example: "If we are discussing sensitive topics, what you share in the group will remain in the group, but if an adult thinks that you might not be safe, we might have to tell some other adults who can help."

Child travel. The child's health, safety, wellbeing and meaningful participation are the most important priorities during travel supported by Nutrition International. For domestic or international travel, ensure the child and the parents or caregivers (or other legally required entity or individual) give informed consent prior to travel. Children are listened to and participate in decisions made about their travel, including the selection of appropriate accompanying adults or chaperones.

12. Prevention measures: safe recruitment

Nutrition International ensures that appropriate steps are taken during the recruitment and selection of employees and representatives so that safeguarding issues are considered and addressed, and that appointed representatives are suitable to work with children and adults in vulnerable situations. As part of the procurement process, consultants are required to sign adherence to the Safeguarding Code of Conduct. Taking a risk-based approach, safeguarding risks are assessed for each role, ensuring the following:

- Reflecting safeguarding commitments and responsibilities in job descriptions and job advertisements;
- Shortlisting by obtaining and scrutinizing information in applications and CVs, resolving any gaps, discrepancies or anomalies in employment history, and requesting confidential disclosure of convictions within the parameters of local employment law;
- Including safeguarding and Code of Conduct questions during interviews for relevant roles;
- Conducting appropriate reference checks in accordance with the Inter-Agency Misconduct Disclosure Scheme requirements and Nutrition International's Reference Policy, verifying the successful applicant's identity, employment history and qualifications. Offers should not be confirmed until all checks are in place;
- Obtaining independent professional references and following up on any concerns;

- Conducting police clearance checks as appropriate; and
- Including this Safeguarding Policy and the Code of Conduct as part of induction.

Nutrition International will not recruit or engage any individual where, during or following the recruitment process, concerns are identified that relate to its duty to protect children and adults in vulnerable situations. This requirement applies to all representatives of Nutrition International, as every role carries an inherent level of trust and potential power that may be subject to misuse. Where safeguarding concerns arise during an individual's engagement with Nutrition International, the Global Safeguarding Lead, in collaboration with People and Culture as appropriate, will assess the concerns and determine the necessary course of action.

13. Prevention measures: safeguarding and sharing data and information

Nutrition International is committed to applying the highest levels of protection when processing data. Nutrition International representatives must protect the personal data of children and adults in vulnerable situations by processing and storing it in accordance with the General Data Protection Regulation (2018) and Nutrition International's policies, including the Data Protection Policy, Social Media Policy and Media Guidelines.

13.1 Protecting data and information

Nutrition International ensures strong data protection and commits to:

- Restricting access to systems containing personal data and maintaining appropriate security measures, including malware protection;
- Limiting access to safeguarding cases to authorized staff only;
- Obtaining informed consent before capturing images or using personal information (for example, photographs and videos of children and program participants), and consulting relevant program staff (such as the Safeguarding Focal Point) where country legislation differs from Nutrition International's minimum requirements;
- Storing photographs and associated consent forms in the organization's approved data management system, using relevant tags and information to enable secure tracing and storage;
- Ensuring all images of children and program participants taken in relation to work with Nutrition International are decent and respectful. Images of children must not show them in states of undress or in inappropriate poses. Stories and images of children must be based on the child's best interests;
- Ensuring that details attached to images and included in stories do not allow a child to be traced to their home or community — for example, by ensuring that information, including combinations of information, which could be used to identify a child is not published in images or interviews; and
- Applying a safeguarding lens to all communications, advocacy and fundraising activities.

13.2 Sharing data and information

Nutrition International commits to sharing information in a way that protects individuals and supports safe, transparent engagement. Nutrition International ensures that:

- Stakeholders clearly understand Nutrition International's objectives, expected behaviours and safeguarding commitments;
- Information is shared in accessible, culturally appropriate languages, formats and media; and

- Communities, partners and program participants know how to provide feedback or report concerns through Nutrition International's established mechanisms.

14. Prevention measures: partnership commitments and safe programming

Nutrition International's work is delivered alongside and through partner organizations and governments. As part of its due diligence processes, Nutrition International ensures that adequate safeguarding assessments are conducted when establishing and maintaining partnerships. This includes an initial assessment of partners' safeguarding capacity through a collaborative safeguarding capacity assessment. Nutrition International works with partners to identify and agree actions to address any significant gaps, strengthen good practice, and provide support where appropriate.

Third-party entities contracted or supported to work with children and program participants must adhere to the same safeguarding principles and approach outlined in Nutrition International's policies and procedures. Vendors, suppliers and other contractors who may be in direct or indirect contact with children or program participants must also be subject to appropriate safeguarding measures.

Partners are responsible for:

- Ensuring that a code of conduct, or equivalent document, is in place that establishes, at minimum, the obligation of staff and volunteers not to exploit, abuse or otherwise discriminate against people and communities;
- Maintaining a safeguarding policy where there is contact with children (any person under 18 years of age) or adults in vulnerable situations;
- Managing any reported safeguarding concerns in a manner that aligns with Nutrition International's requirements and complies with applicable local legislation, seeking specialist support from Nutrition International where needed;
- Informing Nutrition International of all safeguarding concerns or complaints related to Nutrition International-funded projects or programs, or involving Nutrition International representatives, within seven days. This includes allegations of sexual exploitation and abuse of children or adults, as well as other abuses of power; and
- Accepting that Nutrition International may follow up on specific safeguarding concerns or complaints and provide support as required. Where Nutrition International determines that a concern or complaint has not been addressed safely and appropriately by the partner, it may consider withdrawing funding or ending the relationship.

Nutrition International also embeds good safeguarding practice through the systematic application of a safe programming approach at project level. Program participants are engaged in the design, implementation and monitoring of projects and programs, allowing safeguarding risks to be better identified and mitigated. These procedures and the associated guidance documents are outlined in Nutrition International's Program Partnership Guidelines, which detail commitments for both Nutrition International and its partners.

15. Reporting and response to safeguarding concerns or allegations

Nutrition International is committed to creating safe environments to prevent harm. However, in the event that a concern arises, Nutrition International ensures that its response is appropriate and professional, and limits any further possible stress or impact. Nutrition International applies the CHS Investigation Guidelines when responding to safeguarding concerns. Each case is considered individually and in accordance with national legal or other expert advice.

15.1 Mandatory duty to report safeguarding complaints and concerns

All Nutrition International staff and representatives have a mandatory duty to promptly report any concern or allegation about breaches of organizational policies, including the Code of Conduct and this Safeguarding Policy. Anyone can report a concern or make a complaint to Nutrition International about something they have experienced or witnessed. Staff who fail to report a concern may be subject to disciplinary action in accordance with Nutrition International's Disciplinary Policy. This does not apply to survivors, who can decide if, when and how to report. No one will be victimized for making a complaint that is made without malice or for personal gain, and complainants will be protected from detrimental treatment in accordance with Nutrition International's Whistleblower Protection Policy.

15.2 Reporting and response mechanisms

Concerns and allegations can be reported using the Safeguarding Incident Reporting Form and through any of the following channels:

- Nutrition International's Global Safeguarding Lead or a Nutrition International Safeguarding Focal Point;
- Directly to a Nutrition International Country Director, Regional Director or Project Director, as appropriate for the context;
- The confidential and secure Nutrition International webform, Report an Incident, which directs reports to specialist safeguarding staff;
- Nutrition International's safeguarding email: safeguarding@nutritionintl.org; or
- Your respective People and Culture Manager.

15.3 How complaints and concerns are handled

Nutrition International manages safeguarding concerns and allegations in accordance with this policy and the CHS Investigation Guidelines, which are aligned with the Building Safer Organizations Handbook, prioritizing the safety of the person raising the concern or allegation and those affected at all stages.

Upon receipt of a safeguarding concern or allegation, Nutrition International will:

- Take all reports of safeguarding concerns seriously and act on them with the highest priority, in accordance with the guiding principles and established procedures, prioritizing the safety of the survivor;
- Convene a Safeguarding Case Management Committee meeting within 24 hours to assess the concern and determine whether further investigation is required. The Safeguarding Case Management Committee consists of the Global Safeguarding Lead; the Senior Programs Director; the Senior Director, People and Culture; and the Country Director, Regional Director or Senior Manager for the location where the concern was reported. Conflicts of interest will be considered, particularly where allegations involve any committee member;
- Refer allegations involving a member of the EMC, the President and CEO, Directors or Board Members to an external specialist and an additional Board Member for review;
- Determine whether an investigation is required, and decide whether the investigating officer or team is internal or external depending on the nature of the allegation and prevailing conditions. Where investigations are initiated, they will be carried out by experienced and qualified professionals trained in sensitive investigations and a survivor-centred approach;
- Prioritize criminal investigations over administrative investigations. Internal investigations should generally begin only after criminal proceedings have concluded, although parallel investigations may be considered in exceptional circumstances following careful assessment;

- Conduct a risk assessment and establish appropriate measures to maintain the safety of all those involved, updating these measures as required throughout the process;
- Investigate the allegation in a manner appropriate to the content of the report;
- Ensure that actions taken during an investigation are precautionary, and are not a disciplinary sanction or an assumption of guilt;
- Keep the person raising the concern or allegation updated on progress and resolution, as appropriate; and
- Uphold confidentiality in line with Nutrition International's policy commitments. Where children are involved, parents or caregivers will be informed if appropriate. Disciplinary action will be applied against anyone who knowingly shares confidential information about a case.

15.4 Onward reporting

Referral to authorities and onward reporting. Referring incidents of a potentially criminal nature to law enforcement or relevant authorities will be done after taking into account the wishes of an adult survivor, the best interests assessment of a child survivor, and the welfare and safety of all parties. Where local or national laws require Nutrition International to report a potential crime to the police or welfare authorities, an appropriate safety plan that manages the risks for all concerned must be implemented. Nutrition International will report statistics and anonymized information to the relevant regulatory bodies and donors as required. The identity of persons who raise concerns will be kept confidential as far as possible and as appropriate.

Notifying other international development agencies. If a concern relates to another agency, it will be referred through that organization's complaint mechanism or manager.

15.5 Supporting survivors of sexual exploitation and abuse

Nutrition International is committed to supporting survivors and complainants in line with its survivor-centred approach, regardless of whether a formal response (such as an investigation) is carried out. The survivor's needs, wellbeing and safety are paramount, and responses will be guided by their wishes wherever possible.

In some cases, Nutrition International may have a duty of care to act even if the survivor or complainant does not wish to take action forward. Such decisions will be managed on a case-by-case basis by the Safeguarding Case Management Committee, in consultation with the safeguarding team, based on risk assessments and consideration of the survivor's age and agency.

Nutrition International will provide support for community members, partner staff and other representatives involved in an incident management process, recognizing the impact this can have. This includes facilitating access to local medical, psychosocial, legal and protection services, and immediate material care, as identified by the relevant Nutrition International Safeguarding Focal Point and set out in the Safeguarding Context Mapping document for the relevant country.

16. Prevention measures: policy dissemination and training

Nutrition International is committed to ensuring that all staff and partners have the knowledge and capacity to uphold high safeguarding standards and maintain a safe environment for children and adults. For Nutrition International to meet its safeguarding commitments, it is essential that all those associated with the organization clearly understand these commitments, the expectations Nutrition International has of them, and what this means in practice.

This Safeguarding Policy and other guidance documents are translated into local languages and illustrated in child-friendly and culturally sensitive formats. Appropriate language will be used so that young children and non-literate people can easily understand them. The policies will also be made available in accessible formats, such as shorter summary documents and clear print. Posters setting out the organization's commitments will be displayed in public places such as meeting spaces and office reception areas.

All staff must read and sign the Code of Conduct and this Safeguarding Policy upon joining the organization, acknowledging their understanding of and commitment to both. Staff must complete mandatory safeguarding induction on expected behaviours and this policy within their probation period, and participate in refresher training every three years. Nutrition International monitors completion of mandatory inductions and training.

Staff contracting other representatives and suppliers must ensure that, where it is practicable to have bespoke contracts, those contracts state that the contracted party will abide by Nutrition International's Safeguarding Policy and Code of Conduct. A copy of both policies should be shared with the relevant individuals. Individual employees or subcontractors of contractors and partners must also acknowledge the safeguarding policies, with those signatures held by the contractor or partner. An appropriate briefing on both policies should be provided before the contracted representative or supplier commences work, covering expectations on behaviour, relevant protocols and how to raise concerns.

Staff arranging visits to programs should carry out relevant risk assessments for the visit. They should also provide safeguarding briefings for visitors, such as donors, supporters or journalists, prior to visits, covering expectations on behaviour, relevant protocols and how to raise concerns. Visitors should sign the visitor safeguarding acknowledgement form.

Additional specialized training is provided for relevant roles as required, including for staff handling complaints, to ensure that concerns and complaints are handled consistently and in accordance with this policy. Safeguarding Focal Points are trained to provide safeguarding support to colleagues.

17. Monitoring and review of the Safeguarding Policy

Nutrition International has established robust measures and mechanisms to monitor and review safeguarding practices, ensuring both upward and downward accountability. This is achieved through:

- Oversight by the Safeguarding Working Group (SG WG), which monitors implementation of this policy and reviews action plans, while the Global Safeguarding Lead is responsible for monitoring compliance. Any individual who identifies a lack of compliance with this policy should report it immediately to the Global Safeguarding Lead or a Safeguarding Focal Point;
- Monitoring safeguarding-related risks through the corporate risk register. Staff are trained on corporate risk management so that they are equipped to understand, identify and report on safeguarding risks at global, regional and country office levels;
- Quarterly review by the SG WG of complaints related to the conduct of Nutrition International representatives (for example, safeguarding concerns, other conduct matters and grievances);
- Continuous improvement of Nutrition International's practices, informed by analysis of safeguarding reports and other complaints, as well as stakeholder feedback;
- Safeguarding audits conducted every three years, either internally or externally, with results presented to the EMC; and
- A formal review of this Safeguarding Policy every three years, and as needed, with revisions recommended by the EMC, approved by sign-off of the President and CEO, recommended to the Board by the Finance and Audit Committee (FACC) in line with its risk and audit mandate, and given final approval by the Board. Minor updates may be approved by the SG WG.

18. Related policies, procedures, forms, guidelines and other resources

The following policies, procedures, forms, guidelines and other resources support the use and application of this policy:

- **Policies:** Code of Conduct; Complaints Handling Procedures; Whistleblower Protection Policy; Recruitment Policy; Data Protection Policy; Social Media Policy;
- **Procedures:** Safe Recruitment Guidelines; Supply Chain Manual;
- **Guidance:** Program Partnership Guide (under development); Investigation Guidelines; Media Guidelines; Safeguarding in digital communications (online activities guidance);
- **Forms and templates:** Safeguarding Incident Reporting Form; Visitor Safeguarding Acknowledgement Form; and
- **Workplace resolution:** Policies for resolving issues in the workplace, including grievance, whistleblowing and disciplinary policies.

Appendix

The following documents accompany this policy:

- Acknowledgement Form for the Safeguarding Policy;
- Nutrition International Safeguarding Case Management Procedure and flowchart;
- Safeguarding Incident Reporting Form;
- Consent and Assent Forms;
- Terms of Reference for Safeguarding Focal Points;
- Safeguarding Risk Assessment Template; and
- Child safeguarding checklists for communications.



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