

Adult & Child Safeguarding Policy



Legal Background

Habitat for Humanity Great Britain (HFHGB) is a registered charity: in England and Wales, number 1043641; in Scotland, number SC048638 and a Private Limited Company by guarantee without share capital use of 'Limited' exemption, number 03012626.

As a member organisation of Habitat for Humanity International (HFHI), HFHGB is an independent charity which is committed to fully upholding and endorsing the shared safeguarding policy, procedures and principles of HFHI and also complies with the following safeguarding arrangements expected in England, Wales and Scotland.

- The relevant **adult and child safeguarding** legislation, statutory guidance
- The **relevant Partnership's, Board's and Area Protection Committee's** policies and procedures
- The **Charity Commission for England & Wales** and
- **Office of the Scottish Charity Regulator (OSCR)** requirements,
- Including safeguarding considerations for HFHGB's working arrangements with partners engaging with the Global Village volunteer programme **internationally**.

The key principle, irrespective of the country within the United Kingdom where HFHGB works, is that safeguarding is everyone's responsibility and each individual and organisation should play their full part and have a child-centered and adult at risk-focused approach.

Policy introduction

Habitat for Humanity Great Britain (HFHGB) is a charity dedicated to eliminating substandard housing and homelessness worldwide and to making adequate, affordable shelter a matter of conscience and action. We believe that every man, woman and child should have a simple, decent place to live in dignity and safety. In accordance with our foundational mission and principles, we are committed to the highest ethical standards and oppose all forms of abuse, discrimination, exploitation and harassment ("harm").

This Child and Adult Safeguarding Policy, also referred to herein as the "safeguarding policy" or the "policy", reflects our pledge to create and maintain a work and life environment that is safe, productive and respectful for the children and adults we serve. As a charity rooted in undoing policies and practices embedded within institutions, organisations or society that prevent people from accessing opportunities and promoting housing equity, we believe that every child and adult with whom we have contact, whether intentional or incidental, has the right to be protected from any harm that can arise during our operations or project activities. Moreover, we recognize the unique vulnerabilities of children and at-risk adults living in fragile contexts and remain steadfast in our commitment to be a safe organisation for all whom we serve or with whom we have contact.

This policy defines HFHGB's approach to creating safe, healthy workplace, operational and project environments. The accompanying Child and Adult Safeguarding Procedures document, also referred to as the "safeguarding procedures", provides guidance on how operational and project teams can make this policy actionable and adapt practices for the contextual needs and risks associated with the project and/or community. The directives contained in this policy, unless specified otherwise, are intended to apply to the conduct of HFHGB's representatives, as defined in Appendix A.

Policy framework

We recognise that building and sustaining a safe organisation requires a commitment to children, families who partner with Habitat for Humanity, community members, partners and our colleagues. This policy establishes our commitment to children, at-risk adults in communities where we operate, and our staff and volunteers by referencing and acknowledging the role of other policies in reinforcing HFHGB's responsibility to create and maintain operational, programmatic and workplace environments that are safe, inclusive and healthy for everyone. Our Safeguarding

Policy Framework organises safeguarding-related policies, procedures and materials in a way that is accessible and user-friendly. This framework includes but is not limited to the following policies and materials:

1. HFHGB Child and Adult Safeguarding Policy
2. Ethics Covenant (Code of Conduct)
3. Harassment, Bullying and Discrimination Policy
4. Equal Opportunity and Diversity Policy
5. Anti- Trafficking in Persons Policy
6. Whistleblowing Policy
7. Volunteer Policy / Code of Conduct
8. Safeguarding Self-Assessment
9. Safe Recruitment for Employment Toolkit
10. Safer Programming Guidance Note
11. HFH Survivor Support Framework

Policy statement

Every person, child or adult, has the right to be treated with dignity and respect. We recognise and acknowledge our duty of care, our organisational, collective and individual responsibilities to safeguard children, families who partner with Habitat for Humanity, program participants, community members with whom we have contact, and our colleagues and volunteers. This safeguarding policy has been developed as part of our safeguarding framework to reinforce the principles of “do no harm” and gender equality and is part of our risk-based approach to preventing and deterring unintentional or deliberate behaviours, actions or programming by HFHGB representatives that create a risk of or result in child and adult abuse; discrimination; sexual exploitation, abuse and harassment (or SEAH); and labour exploitation. HFHGB maintains a zero-tolerance approach for any abuse of power. All concerns, suspicions or known abuses of power must be reported in accordance with reporting protocols. Our Whistleblowing Policy prohibits retaliation against any reporter acting in good faith, even if the allegation is later unsubstantiated.

We acknowledge that inherently unequal power dynamics exist between HFHGB and children, families who partner with Habitat for Humanity, and adults living in the communities where we operate. Housing inequities, disaster responses and community impact projects increase the likelihood of power being abused. Therefore, HFHGB strictly prohibits sexual activity with any person under the age of 18 years old, regardless of the legal age of consent in the country where the child lives or the contact occurs. Mistaken belief in the age of the child is not a defense. HFHGB also prohibits sexual activity with any program participant, project recipient or community member. And, during the project implementation period, sexual activity and relationships between and among staff members and volunteers who meet through the HFHGB project are strongly discouraged. Any relationship should be declared in line with our Conflict of Interest Policy. Volunteers must also adhere to the policies restricting relationships with community members unless they live in and are from the community.

When any abuse of power is reported, we maintain a zero tolerance for inaction approach.

Policy scope

This policy applies to all Habitat for Humanity entities, including headquarters, area offices, branches and consolidated entities. In addition, every legally independent national organisation and affiliated organisation outside the U.S. is required to adopt its own policies that incorporate the provisions of this policy to the extent permitted by applicable local law and to ensure that the intent of this policy is covered in the entity's existing policies. HFHGB representatives must review the policy, complete the Individual Acknowledgment Form, and submit the completed form to their National Director. Every Habitat branch and national organisation must sign the Policy Acknowledgment Form upon receipt or adoption of the policy or any updates and submit the acknowledgment to the entity's respective area office safeguarding regional adviser and Governance, Risk Management and Compliance, or GRC, representative.

All HFHGB representatives, including Trustees, senior management, staff and volunteers, partners, contractors, are required to read, acknowledge and comply with this policy. HFHGB representatives are responsible for understanding how safeguarding is applicable to their roles and responsibilities and for taking appropriate steps in accordance with this policy and its accompanying procedures to mitigate identified safeguarding risks.

An expectation of, and commitment to, safeguarding is included in all relevant contracts and agreements with external partners and suppliers. Any failure to comply with this policy may result in disciplinary action for personnel or termination of contract or agreement with external partners and suppliers.

Treating others with dignity and respect is a value that extends beyond working hours. HFHGB representatives are expected to engage in the highest ethical standards during interactions with each other, our partners, families who partner with Habitat, and community members. This policy and its commitments are applicable to both the professional and personal lives of our representatives. Ethical behaviours by all Habitat representatives are expected 24 hours a day, seven days a week, including before, during and after business hours.

Implementation

Safeguarding principles¹

By living our values of humility, courage and accountability, we create safety for our colleagues, children, families who partner with Habitat, community members, and our partners. We ask that each HFHGB representative reflect on how they can contribute to a healthy organisation and safeguard those with whom they have contact from preventable harm.

1. We will **work in community** with children and adults to promote and uphold their rights to be protected from harm during our operations and project activities.
2. We will engage children and adults with **empathy** and treat each person with respect, courtesy and dignity.
3. We recognize the inherently unequal power dynamics between HFHGB and the communities where we operate and the particular **vulnerability** to abuses of power that these differentials create. Any abusive, harassing, humiliating, degrading, discriminatory or exploitative behaviour demonstrated by our representatives toward any person is unacceptable.
4. We acknowledge the power we hold and the **trust** that has been given to us. We will not engage in any abuse of power or trust that harms² children or adults in the community.
5. We believe in creating systems of **transparency** to build safe and healthy operating environments with the aim of preventing child abuse; sexual exploitation, abuse and harassment, or SEAH; discrimination; and labour exploitation.
6. We will continue to evolve our safeguarding practices and engage colleagues with humility and **grace** as we learn and make adjustments to strengthen our safeguarding systems.

Behavioural commitments^{3, 4, 5}

1. We will work to create and maintain safe and healthy working environments that prevent sexual exploitation, abuse and harassment and promote the implementation of the HFHGB Code of Conduct. Managers across all levels of the organisation have particular responsibilities to support and develop systems that maintain a healthy workplace culture and environment.
2. We recognise that acts of sexual exploitation, abuse and harassment, (or SEAH), constitute acts of gross misconduct and are, therefore, grounds for termination of employment or contract.

¹ Principles 1-6 reflect Habitat for Humanity's organisational values and HOME commitments to transformational change adapted for safeguarding: community, empathy, vulnerability, trust, transparency and grace.

² This includes any sexual, physical, psychological, spiritual, social, financial or communal harms because of misconduct by a Habitat representative or failure to mitigate risks that lead to harm via safer programming.

³ See [Appendix C](#) for the detailed Safeguarding Behavioral Commitments Acknowledgment.

⁴ Commitments 1-6 address protections from sexual exploitation, abuse, and harassment, or PSEAH, as articulated by the [IASC Six Core Principles](#) and adapted for Habitat for Humanity.

⁵ Commitments 7-10 reflect the importance of the safeguarding pillars and additional behavioral prohibitions.

3. We prohibit sexual activity, including any direct or indirect contact or grooming, with any child (a person under 18 years old) regardless of the age of majority or consent in the local context. Mistaken belief regarding the age of a child is not a defence.
4. We prohibit the exchange of money, employment, goods, special considerations or services for sex,⁶ including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes any assistance that is due to families who partner with Habitat for Humanity, program participants or recipients, or other community members.
5. We prohibit any sexual relationship between a HFHGB representative and any person benefiting from HFHGB programs or projects. We recognise that this type of relationship is improper because it is based on inherently unequal power dynamics, thus undermining the credibility and integrity of HFHGB's charitable mission.
6. We will maintain an organisational mandate that if a HFHGB representative has a concern or suspicion about, or knows that a colleague has engaged in (SEAH) or any other unsafe or harmful behaviour, whether in the same organisation or not, they must report their knowledge or concern via the Habitat Ethics and Accountability Line, or HEAL, or another available reporting mechanism immediately or within 24 hours. All concerns reported in other available mechanisms will also be reported via HEAL.
7. We prohibit modern slavery or any trafficking of people, children or adults, for procurement of commercial sex acts; commercial sexual exploitation of children, or CSEC; or forced labour.
8. We have zero tolerance for any representative accessing, possessing or circulating pornographic or child sexual abuse materials, indecent content, images, videos or messages of children or adults using phones, computers, email accounts, electronic distribution lists, HFHGB - paid internet connections, or VPN services. Inappropriate content sent to an individual or group via text containing explicit language, messages or jokes will not be tolerated.
9. We actively support the relevant statutory agencies legal prosecution, where possible.
10. We engage a trauma-informed, person-centred approach to consult with anyone harmed by misconduct involving a HFHGB representative or unsafe programming. The provision or referrals for care will be made in accordance with the person's wishes. We recognise that children have the right to express their views, and for those views to be considered and reflected in decisions for their care.⁷
11. We respond to all reports and investigate allegations, as necessary, to ensure accountability and administer proportionate discipline in cases of substantiated misconduct.

Safeguarding pillars

HFHGB has a commitment to ensure that our operations and programs are safe for children, families who partner with Habitat for Humanity, community members, and HFHGB representatives and volunteers. All representatives are prohibited from engaging in any abuse of power. In furtherance of this policy, our safeguarding procedures describe activities to make this policy and our commitments actionable.

- **Governance and culture:** We will foster a safeguarding culture to protect children, at-risk adults, community members, and HFHGB representatives from harm that may arise during our operations or project activities. As we continuously learn and evolve our safeguarding approaches and systems, we will adopt a structure to support us in the achievement of our safeguarding objectives. Our leadership will remain steadfast in its commitment to safeguarding and prioritisation of best practices, accountability and risk management.⁸
- **Prevention:** We will implement best practices to reduce the likelihood of safeguarding breaches. We will ensure safeguarding is mainstreamed across all departments and functions and is integrated throughout the project life cycle.
- **Training and awareness:** We will deliver and make accessible the necessary safeguarding training so that all HFHGB representatives understand their responsibilities for protecting children, adults and community

⁶ Soliciting or paying for sex online or in person, even where sex work or [prostitution](#) is legal, is a breach of this policy and will be addressed through investigation and disciplinary procedures.

⁷ Adapted from [United Nations Protocol on the Provision of Assistance to Victims of Sexual Exploitation and Abuse](#).

⁸ Safeguarding will be a part of the risk-based approach across all practices, including internal audits.

members from foreseeable and preventable safeguarding risks. HFHGB representatives will understand their obligation to contribute to healthy office, operational and program environments to protect each other from workplace harms. We will ensure that communities are aware of the Habitat for Humanity International Ethics Covenant in order to socialise their right to be protected from harm that may arise during HFHGB operations and activities.

- **Reporting:** We commit to educating all HFHGB representatives about their responsibilities for reporting any concerns, suspicions or known safeguarding incidents. We will ensure that safe, confidential and accessible reporting channels are available to representatives, and we will encourage families who partner with Habitat for Humanity, children, at-risk adults, and community members to share their concerns through the preferred reporting method.
- **Response:** We will act swiftly and with care whenever a safeguarding allegation is reported. We will prioritise the care and needs of any child or adult affected or harmed by misconduct or unsafe programming conditions and consider the wishes of the affected person through consultative decision-making. Trauma-informed practices will be applied to all investigations and case management activities, and disciplinary actions will be consistent and proportionate to any allegation that is substantiated. We will hold all information confidential and share information only when required by established legal, regulatory or donor mandates.

Governance

The HFHGB board of directors will exercise oversight to ensure adoption and implementation of the Safeguarding Policy. The National Director is accountable for prioritising safeguarding objectives and delivering organisation wide communications about this policy and the accompanying procedures. The Senior Leadership Team is accountable for the implementation and management of this policy. HFHI's global senior director of safety and security and safeguarding is responsible for the development of the safeguarding strategy and may delegate implementation,⁹ monitoring and evaluation activities to the global safeguarding director and regional safeguarding advisers.

Roles and responsibilities

- **Habitat for Humanity International global senior director of safety and security and safeguarding:** This role is responsible for keeping the senior leadership team apprised of the safeguarding strategy, any needed changes to the policy and procedures, and progress on key performance indicators, or KPIs. This role will partner with Housing Opportunities and Mission Engagement, or HOME; Monitoring, Evaluation, Accountability and Learning, or MEAL; Legal; and Governance, Risk Management, and Compliance, or GRC, teams to ensure a holistic and mainstreamed approach to safeguarding.
- **Habitat for Humanity International global safeguarding director:** This role is responsible for the day-to-day implementation and monitoring of the policy and procedures and for developing global safeguarding objectives to be reflected in the KPIs.
- **Habitat for Humanity International regional safeguarding adviser:** This role is responsible for supporting the mainstreaming of the policy and procedures within the respective region. The adviser offers technical assistance to ensure implementing teams have the necessary knowledge, tools and materials to integrate safeguarding as needed. Regional and country-specific KPIs will reflect global objectives and will be identified by the regional safeguarding advisers in coordination with the global safeguarding director.
- **Habitat for Humanity International Governance, Risk Management and Compliance, or GRC:** This function is responsible for providing guidance on safeguarding risk management and managing reported concerns and subsequent investigations in coordination with the global safeguarding director and respective safeguarding adviser subject to advice of the relevant external agencies.
- **HFHGB safeguarding focal points:** This role is responsible for coordinating and championing the mainstreaming of safeguarding, whether at the country, affiliate or program level. Primary responsibilities of

⁹ Implementation for the respective safeguarding mitigations remains the responsibility of all leaders and each HFHI representative in their specific roles and contexts. This language is meant to identify responsibilities at the governance level.

focal points include delivering training and ensuring that representatives and community members can access reporting channels.

- **HFHGB human resources:** This function is responsible for hiring and onboarding candidates, tracking the completion of mandatory training, managing personnel/disciplinary records, and applying personnel action whenever a safeguarding breach has occurred.
- **HFHGB managers:** These roles are responsible for ensuring that their respective teams mainstream and implement the safeguarding procedures. Managers will ensure that project teams complete safeguarding risk assessments and develop mitigation and monitoring plans that are evaluated throughout the project life cycle.
- **All HFHGB representatives:** Our safeguarding values and principles codify the behaviours to which every representative is expected to understand and conform. All representatives are expected to be able to recognise and be alert for concerns about the welfare of any, child, young person or adult at risk involved with the charity and be for the signs of potential safeguarding misconduct and have an obligation to **report** any concern, suspicion or known safeguarding breach as outlined in this policy to the Lead for Safeguarding (or the Deputy, if the Lead is unavailable) and cooperate with any subsequent investigation. In the rare situation that both are implicated, personnel should speak to the Trustee for Safeguarding without delay.

Pillars of safeguarding¹⁰

Governance and culture

Standard 1: Fostering a culture of safeguarding

- **Policy review:** Our Safeguarding Policy and its procedures will be reviewed at a minimum every four years to ensure they evolve with and meet the requirements of the sector. This policy is approved by the full Board of Trustees and will be reviewed and updated annually, or sooner if legislation or practice changes. It is given to all personnel at induction and reinforced via training and supervision.
- **Annual review and verification, or ARV:**¹¹ To support a culture of safeguarding accountability, HFHGB will complete an ARV to acknowledge compliance with the Safeguarding Policy and its procedures. The ARV will use the standards outlined in this policy to inform the annual safeguarding plan. Any gaps that have been identified will be documented in an annual safeguarding plan with assigned roles, responsibilities and timelines to meet the requirements of the standard.
- **Board designation:** Habitat for Humanity International has developed a structure to ensure that safeguarding is prioritised and integrated across our work at all levels. Habitat for Humanity International's board of directors and HFHGB will designate a safeguarding board representative to enhance the visibility and prioritisation of child and adult safeguarding by serving as an advocate within the board and HFHGB. The representative will receive periodic updates on the status of safeguarding within HFHGB. Additionally, the representative will oversee safeguarding improvements, controls and processes and will ensure the board considers safeguarding in its decision-making processes. The responsibility for safeguarding at board level is shared between members. Safeguarding is on the HFHGB's risk register.
- **Safeguarding strategy and personnel:** To drive strategy and ensure implementation of day-to-day safeguarding measures, the HFHI global senior director of safety and security and safeguarding, with the support of the HFHI global safeguarding director, regional advisers and program, or location-specific focal points at HFHI, will work with other functions and departments to meet their safeguarding roles and responsibilities.
- **Leadership responsibilities:** Our senior leadership team will ensure that safeguarding is a recurring agenda item for all regularly scheduled meetings and any safeguarding-related discussions or decisions are reflected in meeting minutes.

¹⁰ The safeguarding procedures provide guidance on making the safeguarding pillars actionable.

¹¹ Aligned with the Annual Safety and Security Assessment.

- **Communications and fundraising guidelines:** We are committed to preventing harm that may ensue as a result of the use of images, videos and stories in internal/external communications and fundraising. The use of photos, videos or storytelling, especially of children and at-risk adults on personal social media accounts, is strongly discouraged. In particular, we understand the ethical responsibility to represent children, adults and community members with dignity, respect and resiliency. We will not tolerate imagery or storytelling that reinforces negative stereotypes. All images, videos and stories will comply with the communications and fundraising guidelines set forth in our safeguarding procedure. GV Build volunteers are expected to comply with the HFHGB Fundraising toolkit and advice from HFHGB personnel.

Standard 2: Establishing accountability

- **Personnel:** All HFHGB representatives will receive and acknowledge the policy. Records of this acknowledgement will be maintained by Human Resources. We will ensure that all representatives understand and fulfil their responsibilities to safeguarding through our annual performance review process.
- **Budgets:** HFHGB will fund operational and resourcing costs for safeguarding personnel and related activities.
- **Key performance indicators, or KPIs:** Metrics to evaluate KPIs are critical to support a culture of safeguarding engagement and knowledge and to support decision-making. KPIs will be assessed over time and evolve alongside our safeguarding culture and practice.
- **Board engagement:** The board will play a key role in driving the organisational prioritisation of safeguarding. On a regular basis, the board will review the status of safeguarding and make recommendations for improvements, as needed.

Standard 3: Risk management

Safeguarding is integral to our Risk Management Framework, and our risk appetite for safeguarding breaches is very low. The framework is supported by our Enterprise Risk Register, or ERR, and program-level safeguarding risks assessments, or SRAs. Our ERR is a top-down approach that aims to identify general safeguarding risks, assess our organisation's capacity for managing the risks, and implement mitigation measures to guard against safeguarding breaches that may interfere with our operations and projects and/or lead to serious harm of a child, adult, community member or Habitat for Humanity representative. The SRAs contextualise our safeguarding practice to specific projects so that we can reduce the likelihood of child abuse; sexual exploitation, abuse and harassment; discrimination; and labour exploitation as we engage with communities. Through our risk-based approach, we embed these risk management practices into HFHGB's risk assessments at all levels and ensure these practices are consistently applied, monitored and evaluated. We recognise the active commitment that robust risk assessments demand, and we will support our representatives to apply a risk-based lens throughout the project life cycle, whereby we design, implement, measure and adjust safeguarding practices according to the associated risks.

Our belief in prevention through risk management applies not only to HFHGB staff members and volunteers, but also to our partners and others working on our behalf. We will ensure that risk management obligations are clearly communicated to contractors, vendors, suppliers and implementing downstream partners, and we will share safeguarding risks and mitigation plans whenever possible and practical.

Standard 4: Safe recruitment

Safe recruitment practices will be routinely applied to ensure that every candidate is suitable to work with children and at-risk adults living in fragile contexts, and that they are able to live our values by contributing to a safe and healthy workplace culture. Our commitment to safer recruitment includes:

- Contextualised job descriptions.
- Notice of safeguarding commitments within the job advertisement.
- Recruitment of multicultural and gender-balanced teams to promote equality and safety and reflect the populations we serve.
- Robust interviewing practices where safeguarding is a core and consistent part of the process.
- Thorough reference check questions to assess attitudes and behaviours.

- Background record check or self-declaration.

Our safeguarding procedures and Safe Recruitment Employment Toolkit provide guidance for Human Resources and hiring managers.

Standard 5: Safer programming

Safer programming practices reflect HFHGB's commitment to identify risks and prevent safeguarding breaches throughout the project life cycle. All project and program proposals include child and adult safeguarding considerations with accompanying resources to support cross-cutting and contextual safeguarding activities. During program design, our teams will ensure that risk assessments, mitigation measures and monitoring plans have been developed in collaboration with regional safeguarding advisers or designated safeguarding focal points, as needed, to ensure a robust and holistic safeguarding assessment at the onset. Additionally, all project designs will include donor-specific requirements to fulfil obligations and meet compliance standards. In addition to the Safer Programming Guidance Note, documents and materials that support our safer programming approach include:

- Project proposals
- Project design
- Budgeting
- Project risk assessments
- People-centered analysis
- Gender analysis
- Safeguarding work plans (for projects)
- Safer programming checklist

Standard 6: Safe partnerships

We will undertake the necessary steps to ensure that downstream partners undergo a due diligence assessment to the nature and extent of their engagement, to help ensure compliance with minimum safeguarding standards and/or identify areas for capacity building. Partner agreements include a safeguarding clause outlining required actions and responsibilities for carrying out projects in accordance with HFHGB's Child and Adult Safeguarding Policy or the partner's own policy, whichever offers greater protections to children and adults in fragile contexts. Partners are responsible for assuming a risk-based approach to projects, and HFHGB will collaborate with partners to identify, mitigate and monitor risks that are likely to arise during the project life cycle.

All partners agree to train their representatives on safeguarding with a focus on prevention, awareness, reporting and response obligations. The partner can request HFHGB to support in capacity building, wherever needed. Partners may agree to adopt HFHGB's reporting systems or develop their own reporting channels. Regardless of the elected reporting mechanisms, partners must share all reported concerns affecting HFHGB-funded activities within 48 hours or two business days. In addition, partners will disclose the findings of all completed investigations on HFHGB-funded activities within five business days of conclusion. The partner report shall include the outcome of the investigation, along with any personnel or organisational action taken to address the misconduct and reduce the likelihood of recurrence.

Partners must agree to take the necessary action to respond to reported concerns swiftly and with care, exercising recognised standards for delivering supportive care and services, mobilising an investigation (as needed), taking remedial personnel action, and documenting management responses for all substantiated allegations.

All successful partners such as charities and community groups delivering refurbishment and enhancement projects sign to say they agree and will comply with: Safeguarding: maintain policies and procedures for the protection of children and other vulnerable persons that have the approval of HFHGB and ensure that all other partners that the partner has formalised a relationship with to deliver this project have effective safeguarding policies and procedures. HFHGB Safeguarding policy is a constituent part of this Grant Funded Partnership Agreement.

Standard 7: Volunteer management

Volunteers are expected to contribute to safe and healthy project environments. All volunteers, whether children, youth or adults, are prohibited from engaging in behaviours that create a *risk of* or actually *result in* harm, as outlined in our Volunteer Code of Conduct. All Habitat for Humanity volunteers are expected to respect the rights of children and adults and to protect them from harm throughout the volunteer commitment. The safeguarding principles and behavioural commitments outlined in this policy apply to volunteers of all ages, backgrounds and abilities.

HFHGB vets volunteers based upon guidance and/or legal requirements in the country where they reside. Upon selection, volunteers will complete contextualised safeguarding training, and an appropriate supervision plan will be developed for every project involving volunteers, especially where children are present.

We believe that child and youth engagement is important. For this reason, we have created child engagement guidance, outlining active supervision standards, ratio requirements and child labour restrictions to ensure the safety and well-being of children on or off work sites and during activities.

HFHGB applies the same best safeguarding practices to working overseas as in Great Britain and complies with any extra requirements of the other country and will observe the principles of the Core Humanitarian Standard on Quality and Accountability for overseas humanitarian work and the Inter-Agency Standing Committee Minimum Operating Standards for Protection from Sexual Exploitation and Abuse where relevant.

Standard 8: Community engagement and child participation

Community engagement is an important part of creating a safeguarding culture that encourages partnership with the community and seeks to include child participation so that projects are child- and adult-focused *and* community-driven. HFHGB will ensure that communities, especially children and adults in fragile contexts, understand and exercise their right to be protected against child abuse, discrimination, SEAH, labour exploitation or other forms of harm. HFHGB will work strategically with other functions to partner with communities in meaningful and sustainable ways. To identify existing vulnerabilities and risks, HFHGB will engage in community assessments whereby we will meet with key stakeholders, including but not limited to children; women; LGBTQI+; people with disabilities; people in ethnic, racial, religious and cultural minorities; and elders, to understand the local context.

We recognize the strength and capabilities of the people we serve and the communities where we operate. We are committed to listening to their voices, individual and collective, to apply their suggestions and feedback and share our power across the continuum of decisions that affect the lives of community members. Through our monitoring and evaluation protocols, we will seek feedback on safeguarding from children and adults and schedule regular focus group discussions to raise visibility about their rights.

Training and awareness

Standard 9: Training and management responsibilities

- **Mandatory training:** Safeguarding induction training is mandatory as part of onboarding for all HFHGB staff members, volunteers and board members within 30 days **and** prior to contact with children, families who partner with Habitat for Humanity, and community members. Representatives who have not completed the safeguarding induction will not be able to work in communities until verification of training has been completed. The safeguarding induction training will engage representatives so that they are able to prevent, recognise and detect, report, and respond to any concerns, suspicions or known incidents of a child or adult safeguarding breach.
- **Contextualised training:** Project teams, including disaster and emergency response, may be required to engage in contextualised training in addition to the mandatory induction.
- **Refresher training:** Refresher safeguarding training is required every two years for general staff members and Global Village volunteer team leaders. Project teams may be required to complete supplemental and/or contextualised safeguarding training more frequently, in accordance with project risks and donor requirements.
- **Managers:** As part of their responsibilities for creating and maintaining a safeguarding environment, managers are responsible for ensuring their team members complete all required training. Managers must also communicate any safeguarding-specific responsibilities that team members have during the life cycle of the project.

- **Implementing partners, contractors and suppliers:** For information related to training for implementing partners, contractors and suppliers, please review Standard 6.
- **Visitors:** All casual visitors and visiting HFHGB staff members are given a verbal safeguarding briefing before visiting a project site. Whenever possible and according to local practice, visitors will sign the Code of Conduct and/or Safeguarding Policy.

Standard 10: Raising awareness

- **Awareness materials:** Signs or posters will be affixed in all HFHGB offices and at work sites with messaging about the “do no harm” principle and information on how to report a safeguarding allegation. Such messages may include “zero tolerance” for child abuse, SEAH, labour exploitation, and other human rights abuses; the right of community members to be protected from such harms; and Habitat’s prohibition against the exchange of services or resources for sex or exploitative labour (e.g., drawing a distinction between sweat equity and forced labour).
- **Availability of information:** Safeguarding information and policies will be available in local languages. Materials will be child-friendly and understandable across a range of cognitive and developmental abilities. Words and concepts used in awareness-raising materials will be adapted to the local context. Communities will have access to information about the safeguarding risks and project benefits associated with Habitat’s work in the community.

Reporting

Standard 11: Reporting procedures and mechanisms

We endeavour to prevent harm through the activities outlined in this policy and its accompanying procedures. We also recognize that in our endeavour to reduce safeguarding incidents from occurring or recurring, our representatives have the responsibility of detecting and reporting concerns, as early as possible, to ensure early intervention to prevent harms to children, at-risk adults, community members and our colleagues, whether internal or external to HFHGB. All Habitat offices are expected to adopt clear management protocols and procedures on how to manage a safeguarding concern.

- **Responsibility to report:** All Habitat representatives, especially managers, have the responsibility to report *any* concerns, or direct disclosures that may be a breach of this policy or its procedures.
- **Whistleblower Policy:** HFHGB’s Whistleblower Policy expressly prohibits retaliation and protects representatives engaged in **good faith reporting** from retaliation or any threat of retaliation by any other Habitat representative. Any person who engages in retaliation will be subject to discipline, up to and including termination of employment. (*Note: Intentional submission of false allegations is a fraudulent activity and will be handled in accordance with HFHGB’s policies.*)
- **Failure to report:** We recognise our collective duty to create safe, healthy work and project environments. Failure to timely report a safeguarding concern, suspicion or known incident will be subject to discipline, up to and including termination of employment or contract. Failing to report is a serious breach of this policy and leaves the child, at-risk adult, community member or colleague experiencing the alleged harm vulnerable to further harm without appropriate and timely intervention.
- **Reporting misconduct or unsafe programming:**
Any HFHGB representative who receives a safeguarding complaint or who has knowledge or reasonable suspicion of safeguarding misconduct (whether by an HFHGB representative or any other organisation’s representatives operating in the local context) or who knows of any unsafe programming risks must follow the procedures outlined in this policy.
 - **How to report:** Inform their direct supervisor of the concern, suspicion, incident or complaint. If the representative has reason to believe that their direct supervisor may either be involved in the misconduct or has a conflict of interest in connection with it, the reporting party may report to:
 - A higher-level supervisor in their reporting line
 - HFHGB Safeguarding Focal Point, or email Safe@habitatforhumanity.org.uk
 - The global or area office safeguarding officer, the local safeguarding focal point

- The Habitat Ethics and Accountability Line, or HEAL

All reported serious concerns and allegations received by a safeguarding adviser, officer or focal point, any manager, supervisor, or HR Personnel, must be entered into HEAL within 24 hours of notice.

- **Confidentiality and anonymity:** Report a concern anonymously or in name. A representative may choose to report a concern anonymously, in other words, without identifying who they are. When a report is made anonymously, HFHGB has no means for identifying or attributing the source of the information.
 - **Timing:** All HFHGB representatives are required to report any safeguarding concern to the HEAL line as soon as it becomes known but, in any case, within 24 hours or one business day.
 - **Local reporting mechanisms:**¹² HFHGB will ensure that there are project-specific, local reporting mechanisms that are functional and confidential for all children, adults, community members and Habitat for Humanity International representatives to access.
 - **Reporter's responsibilities:** Because of the sensitivity of safeguarding, anyone reporting a concern ("reporter") must not start an investigation on their own or engage in investigation-type activities. Reporters are responsible for reporting information shared with them or events that they heard or witnessed directly but should refrain from gathering evidence or questioning the child, adult or staff member affected by the alleged misconduct or unsafe programming activity. Furthermore, reporters must not inform or question potential witnesses or the person who has allegedly engaged in misconduct.
 - **Community feedback loop:** Whenever safe and practical, HFHGB will provide feedback to the community about reported safeguarding incidents to ensure transparency and accountability in the management of each concern. Because of confidentiality, it will not be possible to share specific information without the full informed consent of the person affected, including assent from any affected child and also subject to permission from any external agency investigating. The regional safeguarding adviser or a designee will collaborate with the MEAL team to design a feedback loop as part of the local community feedback and reporting mechanism, or Community Feedback and Reporting Mechanism (CFRM).
 - **External reporting to authorities, donors or the public:** Where required or appropriate because of a contractual, legal or other donor obligation, there are circumstances where it is required or appropriate for HFHGB's and/or Habitat for Humanity International to disclose alleged or confirmed safeguarding misconduct to external parties, such as donors, regulators or other governing bodies. Decisions related to "whether, what and to whom" to report externally under such circumstances will be guided by:
 - Jurisdictional or legal requirements within the country where the alleged incident occurred.
 - Any requirements defined in HFHGB's and/or Habitat for Humanity International contractual commitments to external parties (e.g., reporting requirements based on a grant agreement, etc.).
 - Any requirements for mandatory reporting of *serious incidents* that are established by charity watchdogs or other governing bodies in the relevant jurisdiction, such as required by the UK Charities Commission and other comparable organisations.

As appropriate to raise awareness and demonstrate public accountability, Habitat for Humanity International (and/or HFHGB) may voluntarily share information related to allegations of safeguarding misconduct and/or investigations, as guided by the parallel philosophies of transparency (to donors, regulators) and confidentiality (protection of affected parties).

HFHGB and/or Habitat for Humanity International may choose to report certain issues to donors or governing bodies where no clear contractual or legal requirement exists, but where we determine the disclosure to be in the best interest of the public trust.

¹² These reporting protocols do not replace, but instead supplement, the local reporting community-based feedback mechanisms (such as a dedicated local complaint email address, a local hotline, a community suggestion or complaint box, etc.) that each Habitat for Humanity organization must also have implemented to receive such concerns directly from children, adults, community members and other external stakeholders. All safeguarding complaints raised through community-based feedback mechanisms must be added to the Habitat Ethics and Accountability Line within 48 hours.

HFHGB and Habitat for Humanity International will provide the Habitat for Humanity International board of directors and HFHGB's board of directors with routine updates on safeguarding allegations and investigations to facilitate proper oversight.

Response

Standard 12: Responding to reported concerns

- **Trauma-informed practice:** We will engage trauma-informed practices by consulting with any child or adult harmed by alleged misconduct to ensure that their rights and wishes are prioritised and supported.
- **After- and survivor-care referrals:** Any child or adult affected by misconduct ("victim," "survivor" or "affected child/adult/person") has the right to receive imminent and extended care to assist in their recovery from harm. Our Safeguarding Survivor Support Services Framework aims to guide all organisations operating under the Habitat for Humanity International network (including HFHGB.) to comply with the expectations to provide appropriate assistance to any child or adult affected by a safeguarding breach. HFHGB, with the support of Habitat for Humanity International, will consult with the affected child or adult to conduct a Safety and Risk Assessment, which will inform the short-, mid- and long-term care needs and risks associated with the delivery of care and/or investigation activities. HFHGB will maintain an aftercare directory that will record community-based services where referrals can be made.
- **Communications:** We are committed to communicating with the child or adult affected by the alleged misconduct throughout and upon conclusion of the investigation. When advised this is possible by any external investigation or other agency
- **Management response:** Final investigation reports, outcomes, external agency advice and any other reviews will help to inform the necessary management response, action plans and/or application of lessons learned.

Retaliation

We will not tolerate retaliation against any representative who has engaged in a legally protected activity. Protected activities include good faith reporting of a safeguarding allegation, participation in a safeguarding investigation, and reasonably opposing conduct made unlawful by the local laws, legislation or regulations where the misconduct is alleged to have occurred.

Anyone who has engaged in retaliation will be subject to disciplinary action, up to and including termination, and in accordance with our disciplinary protocols.

Retaliation can take many forms. Adverse actions that *may* indicate retaliation has occurred include but are not limited to:

- Demotion, reassignment, or transfer.
- Termination.
- Salary or benefit reduction.
- Exclusion or being passed over for opportunities.
- Denial of time off, a promotion or a raise.
- An unwarranted negative performance review.
- Harassment.
- Threats.
- Any other form of physical, psychological, social, spiritual or financial harm.

Any representative who experiences or believes they have experienced retaliation should **report** it immediately.

Confidentiality

This policy is in line with the Information Commissioner's Officer's (ICO) guidance about confidentiality and these details are available to everyone who comes into contact with HFHGB.

HFHGB fully endorses the principle of the welfare of children, young people and adults at risk, overriding any obligations of confidence it may hold to others. No one working, or involved, with HFHGB can promise absolute confidentiality. Individual cases will only be shared or discussed on a “need to know” basis.

We observe the principle of confidentiality throughout our safeguarding case management processes. Wherever possible, private information will be shared with people who “need to know” and only after analysing the requirements and use of the information. People who need to know may include specific people in HFHGB and Habitat for Humanity International leadership, GRC/safeguarding investigators, or external parties such as attorneys, law enforcement, courts, regulatory authorities and/or donors.

We believe in managing information with confidentiality to:

- Prevent harm that can be caused when information is not shared in an ethical or responsible way.
- Safeguard against the misuse of information.
- Protect the reputation of people and HFHGB.
- Encourage reporting by building trust.

For these reasons, we will protect the identities of all witnesses (e.g., complainants, reporters, respondents and general witnesses) wherever safety issues require and whenever possible in conformity with local laws. Any information that HFHGB or Habitat for Humanity International is required to share will be reviewed with the legal and GRC teams before it is released to any external party or authorities. In the case that confidential information must be disclosed, any witness will be informed about how their information is being shared.

Data Protection

HFHGB will treat any personal information by which an individual can be identified, for example, name, address, and email, in accordance with the provisions of Data Protection Act 2018 (DPA 2018), and the UK General Data Protection Regulation (UK GDPR) and will not share information with any third party, except where required by law. HFHGB is registered with the ICO, number Z9598276

Informed consent and assent

When consent is required for any care, activity or intervention HFHGB will obtain consent from the individual if of sufficient age and understanding, unless they are at an immediate risk of harm. Where relevant, HFHGB will ensure it fulfils its obligations under any relevant Child Care Law in terms of parental responsibility or Mental Capacity legislation on supporting, where possible, the individual's right to make their own decisions. Any decision made should be the least restrictive and recorded.

We believe that fully informed consent and child assent are critical to promote the rights of children and adults and to dismantle oppressive and exploitative practices to which marginalised and disenfranchised communities have historically been subjected. As we engage children and adults, we are committed to ensuring that they understand the risks and benefits of their participation and the uses of their sensitive data or personally identifiable information, or PII.

We will never coerce, require, rush or manipulate any child or adult to consent or assent to any activity. Whenever the activity for which we are seeking consent and assent (e.g., photos for communications or fundraising) is not required to receive the service or benefit being offered, HFHGB will not withhold or refuse services, programs or access to resources because of the child's or adult's refusal.

Children and adults may rescind informed consent or assent at any time. In any case where consent or assent of a photo, video or story has been revoked, HFHGB will make reasonable efforts to ensure that all such materials are removed from circulation. The child and/or adult will be informed of any limitations involved in retracting materials (e.g., if images, films or stories are archived but searchable news articles, commercials or marketing materials have been released to the public) at the time that informed consent and assent is given.

Revision/review history

Date	Explanation
[Date policy adopted]	[Initial policy approved.]
[Date policy reviewed]	[No updates made.]
[Date policy revised]	[Summary of revisions]

Appendix A: Definitions

Abuse in Children Young People and Adults at Risk

The following list is for guidance only. It is important to be observant, listen to what is being said and record. e.g. is what being observed and said about an injury consistent with the injury?

- Abuse related to faith or belief
- Alcohol and Substance misuse
- Bullying, harassment and sexual harassment
- Breast Ironing
- Carrying offensive weapons
- Child criminal and sexual exploitation including County Lines
- Child on child abuse, including sexual violence and upskirting
- Concealed pregnancy
- Criminal exploitation
- Discriminatory
- Domestic abuse, including "honour" based abuse
- Emotional
- Exploitive use of technology
- Female Genital Mutilation (FGM)
- Financial or material abuse
- Financially Motivated Sexual Extortion (FMSE)
- Forced marriage
- Gangs
- Gambling harms
- Hate and "mate" crime
- Hazing and initiation rites
- Hoarding
- Modern slavery
- Neglect and acts of omission
- Online safety
- Organisational or institutional
- Psychological
- Physical
- Radicalisation
- Self-neglect
- Sexual
- Trafficking

Abuse of power: When a person uses their position of power, trust or influence to their own advantage, to place another person at a disadvantage, or to harm another person inadvertently or deliberately.

Adult: Any person over the age of 18 (in most countries).

Affected person: Sometimes referred to as the "complainant," "survivor" or "victim." The affected person is someone who has experienced the alleged misconduct or harm.

Assent (child): *Child assent* is the process by which a child is consulted about their participation and/or use of sensitive data or PII. Whenever consent is required for a child to participate in a project or for Habitat for Humanity to use their sensitive data or PII, child assent should be obtained contemporaneously to informed consent by their parent, legal guardian or responsible caretaker.

At-risk adult: A person over the age of 18 with a physical, mental or life status that causes particular vulnerability (such as a physical or mental disability), or any adult living in a fragile context that heightens the risk of an abuse of power because of limited access to basic resources, including food, housing, safety or water.

Adult at Risk.

There is no single law that defines an adult at risk. An adult at risk is a person over the age of 18 years (16 in Scotland) and is:

- having needs for care and support, and
- experiencing, or is at risk of, abuse and neglect and
- as a result of those care needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Best interests of the child: Deciding what type of services, actions and orders will best serve a child and who is best suited to take care of a child.

Bullying: A form of aggressive behaviour that occurs in an intentional and repeated manner, causing another person to feel hurt. Bullying can take multiple forms, including spreading rumours, threatening, physical or verbal assault, engaging in insidious practices such as excluding a person from a group, or any other gestures or actions that occur in a less visible manner.

Casual visitor: Any short-term or one-time visitor. The casual visitor may be a nonrepresentative (e.g., donor, Upcycling Volunteer, HFHGB celebrity ambassador, guest) invited to visit a project site or participate in a HFHGB-sponsored or HFHGB-funded activity.

Child/Young Person in Great Britain: There is no single law that defines the age of a child across Great Britain. A child is anyone who has not yet reached their 18th birthday (16th in Scotland). In Scotland, whilst child protection procedures may be considered for a person up to the age of 18, the legal boundaries of childhood and adulthood are variously defined.

Child abuse: Any form of physical, emotional or sexual abuse; neglect; or exploitation resulting in actual or potential harm to the child's health, well-being, survival, development or dignity by an individual or an institution. It includes but is not limited to any act or failure to act that results in death or serious physical or emotional harm to a child, or an act or failure to act that presents an imminent risk of serious harm to a child.

Child labour: Exploitive work that deprives children of their childhood, their potential and their dignity and is harmful to their physical, social, psychological and/or mental development. It refers to work that is mentally, physically, socially or morally dangerous and harmful to children and that may also interfere with their schooling.

Child rights: International standards memorialized within the U.N. Convention on the Rights of the Child that recognizes the unique vulnerabilities and protections for people under the age of 18. It also upholds the principles of treating all children, without distinction, with dignity and integrity.

Commercial sexual exploitation of children (CSEC): The sexual abuse or exploitation of a child in return for cash or any other goods or services. Examples of CSEC include child prostitution child sexual abuse or other indecent images, and child sex tourism.

Complainant: Sometimes referred to as the "affected child or adult," "survivor" or "victim." The complainant is the person who has experienced the alleged misconduct or harm.

Confidentiality: Confidentiality refers to keeping a person's or HFHGB information private or protected.

Disaster response: HFHGB's progressing after a disaster or crisis, focusing on both early and long-term recovery.

Discrimination: Unjust or unfair treatment of people based on certain prejudices or characteristics, including an individual's sex, sexual orientation, gender identity, race, ethnic background, national origin, age, religion, disability, military or veteran status, or other legally protected characteristic.

Emotional abuse: Any isolated or ongoing harm to a child's or adult's emotional, intellectual, mental or psychological well-being or development.

Exploitation: The actual or attempted abuse of a position of vulnerability, power differential or trust for the benefit of the individual leveraging their position, power, privilege or wealth, sometimes through enticement, manipulation, coercion or trickery, to engage a child or adult in labour, domestic servitude, forced criminality or other illegal acts to profit monetarily, socially or politically.

Fragile or emergency contexts: Geographic areas (e.g., communities, regions, countries) where there has been an emergency or destabilization due to a disturbance in social order or rule of law, or other disrupting event or where there is limited access to basic needs like clean water, food, shelter and safety.

Good faith reporting: The genuine belief that a risk or harm has arisen at the time it was reported.

Grooming: The process in which an adult or older child or youth builds a relationship with a child and/or the child's caretaker to gain the child's and caretaker's trust for the purposes of sexually abusing or exploiting the child.

Grooming can happen online or in person and is a gradual process that can sometimes be difficult to detect.

Grooming may include but is not limited to:

1. Showing preferential treatment or Favor to a child.
2. Giving the child gifts, rewards or special privileges.
3. Removing the child from interactions with their peers or safe adults in their life.
4. Using knowledge of a child's vulnerability to build a close relationship.
5. Befriending the parents or caretakers who are responsible for protecting the child.
6. Allowing the child access to alcohol or drugs or encouraging illegal activity.
7. Building intimacy through "special" experiences shared only by the child and groomer.

Harm: Any form of abuse, discrimination, exploitation and harassment, or any injury resulting from unsafe programming.

Harassment: Any comment or behaviour that is offensive, demeaning, humiliating, derogatory or otherwise inappropriate or that fails to respect the dignity of an individual. It can be committed by or against a beneficiary, partner, staff member, official or any other person involved in any way in a HFHGB program or operation.

Human rights: International standards, as articulated by the U.N. Universal Declaration of Human Rights, that recognize and protect the dignity and integrity of every individual without distinction.

Informed consent: The process by which a competent adult is given information about the risks, benefits and use of their information or that of their child so that they can make an informed decision about their participation and/or use of sensitive data or PII.

Making Safeguarding Personal (MSP, Adults) : MSP aims to develop a person-centered and outcome focused approach to safeguarding work for adults. The adult concerned must always be at the center of adult safeguarding enquiries, and their wishes and views sought at the earliest opportunity. There are six principles:

- Empowerment - presumption of person led decisions and informed consent.
- Prevention - it is better to take action before harm occurs.
- Proportionality - proportionate and least intrusive response appropriate to the risk presented. Protection - support and represent for those in greatest need.
- Partnership - local solutions through services working in their communities.
- Communities - have a part in preventing detecting and reporting abuse and neglect.
- Accountability - accountability and transparency in delivering safeguarding

Mental Capacity (Adults): The primary purpose of mental capacity legislation is to promote and safeguard decision-making within a legal framework. There is a presumption of capacity – every adult has the right to make their own decisions and must be assumed to have capacity to do so unless it is proved otherwise. This means that it cannot be assumed that an adult cannot make a decision for themselves just because they have a particular medical condition or disability. It is a criminal offence for anyone to knowingly ill-treat or willfully neglect a person who lacks capacity.

Modern slavery (aka human trafficking or combating trafficking in persons, or TiP): Holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour are to be construed in accordance with Article 4 of the Human Rights Convention, as further defined by the UK Modern Slavery Act of 2015, and the U.S. government clause for Combating Trafficking in Persons.

HFHGB will report all concerns of modern slavery, any trafficking of people children or adults for procurement of commercial sex acts; commercial sexual exploitation of children, or CSEC; or forced labour to the appropriate agencies both in Great Britain and overseas.

Neglect: The failure to meet a child's or adult's basic physical and/or psychological needs either deliberately or through negligence. This may include but is not limited to failure to prevent harm, inadequate supervision of children, failure to access urgent medical care for a child or adult, exposure to unsafe project environments (e.g., unsafe programming or access to harmful objects or building materials), and/or failure to properly child-proof project environments, as needed.

Partner: Any organization or individual receiving HFHGB funding or supporting or implementing a project or program on behalf of HFHGB.

Personally identifiable information (PII): Any information that can be used on its own or with other information (e.g., triangulation) to identify, contact or locate a single person or group of people (e.g. homeowner).

Physical abuse or assault: The non-accidental use of physical force that inadvertently or deliberately causes a risk of or actual injury to a child or adult.

Pornography: Any indecent images, videos or content involving the partial or full nudity of any child or adult.

Prostitution: The exchange of money, goods, resources or favours for any sexual act involving direct or indirect contact.

Protection (child or adult): In the humanitarian and development sector, protection is distinct from safeguarding. Protection concerns arise when a person unaffiliated with HFHGB engages in harmful, abusive, discriminatory, exploitative or harassing behaviours toward a child or adult. For example, a child protection issue can involve the abuse or neglect of a child by their parent, a relative or another community member. Another example may be an adult from the community who is experiencing domestic violence (e.g., intimate partner, dating or familial violence). This would be considered an *adult protection* concern. In other words, protection issues involve abuses of power or acts of violence, maltreatment or harm toward children and adults by people within their family or community. Protection may necessitate external reporting. Safeguarding advisers should be consulted to determine if external reporting (e.g., law enforcement, child protection, elder services, etc.) is safe and practical within a specific context. It is possible for a protection concern to also be a safeguarding concern (and vice versa), so please speak with a safeguarding adviser, officer or focal point to ensure proper reporting of any concern, suspicion or known incident.

PSEAH: The protection from sexual exploitation, abuse and harassment.

Reporter: Any person who reports a concern, suspicion or known incident, whether anonymously or in name.

Representatives: An individual acting on behalf of HFHGB, including but not limited to board members, staff members, contractors, interns, AmeriCorps members (including VISTA members), volunteers, implementing partners and suppliers (suppliers also include local volunteers and artisans).

Respondent: The person who is responding to an allegation of misconduct, or the person alleged to have engaged in misconduct.

Retaliation: Any negative or adverse action taken against any HFHGB representative engaged in a protected activity (e.g. Reporting an abuse of power or participating in an investigation).

Safeguarding: The organisational policies, procedures and practices identifying the behavioural expectations and prohibitions to ensure that interactions between HFHGB representatives and children, adults, community members, partners and colleagues are safe, inclusive and healthy. Safeguarding policies, procedures and practices endeavour to ensure that abuses of power by HFHGB representatives are first prevented. When an abuse of power occurs, safeguarding systems ensure that concerns, suspicions and known incidents are reported in a timely manner to allow for an organisational response that interrupts harm, assesses safety, delivers necessary care and services, and addresses misconduct through established protocols.

Sexual abuse: Any actual or threatened physical intrusion of a sexual nature (including inappropriate touching), whether by force or under unequal power dynamics or otherwise coercive conditions.

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.

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) that occurs between a HFHGB staff member or representative and any person with whom they interact in their HFHGB role. *For further details, see the Policy on Harassment, Bullying and Discrimination.*

Survivor: Sometimes referred to as the “affected person,” “victim” or “complainant.” The survivor is the person who has experienced the alleged misconduct or harm.

Victim: Sometimes referred to as the “affected person,” “survivor” or “complainant.” The victim is the person who has experienced the alleged misconduct or harm.

Youth: Any person between the ages of 15 and 24, as defined by the United Nations for statistical analyses. It is important to note that the term includes people who are defined in this policy as both children and adults. For this reason, any engagement with anyone under the age of 18 must abide by the Safeguarding Policy provisions.

Zero tolerance: The organisational commitment to hold accountable any HFHGB representative who engages in harmful, unhealthy or unsafe behaviours with any child, adult, community member, partner and/or colleague.

Zero tolerance for inaction: The organisational commitment to take all credible reportable concerns seriously and ensure proper care and support are provided to any person who has been harmed, abused, discriminated against, exploited and/or harassed.

Appendix B: Related internal policies of HFHGB and external resources

1. HFHGB Child and Adult Safeguarding Policy
2. Ethics Covenant (Code of Conduct)
3. Policy on Harassment, Bullying, & Discrimination
4. DEI Policy
5. Anti- Trafficking in Persons Policy of HFHI
6. Whistleblower Policy
7. Background Screening Policy
8. Volunteer Code of Conduct
9. Safeguarding Self-Assessment
10. Safe Recruitment for Employment Toolkit
11. Safer Programming Guidance Note
12. HFH Survivor Support Framework

Appendix C: Individual Acknowledgment

1. Individual Policy Acknowledgment

This Safeguarding Policy describes HFHGB's commitment to preventing and responding to harm caused by physical or sexual abuse or exploitation, harassment, or bullying of Habitat for Humanity representatives, people in the communities we serve (especially vulnerable adults and children), and people whom we partner with.

I acknowledge that I have read and reviewed the requirements contained in the policy and agree that I will follow them.

I further commit to report to Habitat Ethics and Accountability Line reporting tool ([HEAL](#)), when advised to by the external agencies, any suspected safeguarding misconduct and to help to create and maintain an environment that prevents sexual exploitation and abuse; safeguards the rights of beneficiaries, research participants and community members (especially vulnerable adults and children); and promotes the implementation of Habitat for Humanity's Ethics Covenant and Code of Conduct. *(Note: Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.)*

I understand that I should consult with a HFHGB safeguarding focal point, Habitat for Humanity International safeguarding officer or a member of the Governance, Risk Management and Compliance, or GRC; Global People Team, or GPT; or the Legal department regarding any questions I have about the application of this policy.

Signature

Date received

Name (typed or printed)

Policy Date

This policy was agreed by the full Board of Trustees and disseminated on [insert date here] and will be reviewed annually or when there are any legislation, statutory guidance or organisational changes.

Policy Review Date:

Signed:

Chair of Trustees:

Trustee for Safeguarding:

Lead for Safeguarding:

Date:

Date of next review:

2. Safeguarding Behavioural Commitments Acknowledgment

Habitat for Humanity representatives¹³ will:

1. Treat all people with respect and dignity.

- ☐ In recognition of the fundamental rights of all people to live and work in environments free from all forms of harm, abuse, discrimination, bullying, exploitation and harassment, I will behave with the highest standards of ethics to uphold the safety, dignity and respect of every child, adult, community member, volunteer, partner and colleague with whom I have contact.
- ☐ I **will** engage others with cultural humility¹⁴ and contribute to safe workplace, operational and project environments that celebrate diversity, practice equity, prioritize inclusion and promote belonging.
- ☐ I **will** promote healthy communication void of shame, humiliation, belittling, degradation or any form of emotional abuse when engaging with children, adults, community members, volunteers, partners and colleagues.
- ☐ I **will** engage in conduct consistent with the Child and Adult Safeguarding Policy and policies outlined in the Safeguarding Framework.
- ☒ I **will not** abuse or misuse any power, influence, privilege, authority or trust I may hold.
- ☒ I **will not** engage in sexual activity with anyone under the age of 18, regardless of local laws or the age of consent. Furthermore, I will not engage in any relationship — sexual or otherwise — that may be exploitative or harmful.
- ☒ I **will not** meet alone with or show preferential treatment to any child. (A minimum of two adults will always be present when interacting with a child.)
- ☒ I **will not** engage in any behaviour, including touching a child or adult, that is or can be interpreted as inappropriate, grooming, harmful or abusive.
- ☒ I **will not** solicit sex¹⁵ or exchange money, employment, goods, special considerations, or services for sex, including sexual favours.
- ☒ I **will not** engage in any form of harassment, including comments, jokes, gestures, emails, suggestive looks, that are or could be interpreted as inappropriate, or other behaviours that may create discomfort; be unwelcomed; or otherwise result in a hostile, intimidating or difficult work or project environment.
- ☒ I **will not** exploit the labour of any person for professional or personal benefit or gain and ensure “sweat-equity” projects are clearly explained.
- ☒ I **will not** discriminate against any child, adult, volunteer, partner or colleague.
- ☒ I **will not** provide anything of value (e.g., money, goods, services, etc.) to project participants unless it is part of the project and there is clear communication about its purpose.

2. Protect sensitive data and personally identifiable information, or PII.

- ☐ I **will** exercise care, practice confidentiality, and follow the Data Protection and Retention Policy when working with or managing sensitive data or PII.
- ☐ I **will** obtain informed consent and assent by ensuring that any project participant — child or adult — is informed of risk, benefits and/or requirements in simple language that is easily understood prior to the provision of any service, benefit or use of data.
- ☐ I **will** follow the Communications and Fundraising Guidelines and only use photos, videos or stories depicting children, adults or community members (including families who partner with Habitat) for business purposes.
- ☐ I **will** only use official business channels to communicate with project participants and Habitat representatives and will make those communications available upon request.

¹³ Including but not limited to board members, staff members, contractors, interns, AmeriCorps members (including VISTA members), volunteers, implementing partners and suppliers.

¹⁴ Cultural humility is a process of self-reflection to understand the culture of another person, the influences that have shaped another person, and the willingness to be open to learning about the cultural identity of another without judgment or bias.

¹⁵ This applies even in jurisdictions where sex work is legal.

- ☒ **I will not** exchange personal contact information or personal social media accounts with project participants (including families who partner with Habitat), child or adult volunteers, or members of the community where we operate.
- ☒ **I will not** make publicly available PII and have been strongly discouraged from sharing photos, videos or stories, especially of children or adults from communities where we operate, through my personal social media accounts.
- ☒ **I will not** use my personal social media accounts, personal mobile phone, or personal email accounts to connect, “friend” or communicate with children or adults from communities where we operate.

3. Report concerns, rumours, suspicions or known safeguarding violations.

- ☐ **I will** report any safeguarding disclosures¹⁶, concerns, rumours, suspicions or known incidents within 24 hours or at the earliest time a reporting mechanism is available.
- ☐ **I will** intervene, if safe and possible, to interrupt harmful behaviours.
- ☐ **I will** share all known information to ensure a timely response and provide additional information or evidence as requested.
- ☐ **I recognize** that “good faith” reporting is a protected activity and will share concerns even if I don’t have all the information.
- ☒ **I will not** delay in reporting, withhold information, or ignore requests for evidence.
- ☒ **I will not** deter reporting by a program participant, volunteer, partner or colleague.
- ☒ **I will not** retaliate against, treat poorly or engage in harassment toward anyone who has or is believed to have reported a safeguarding incident.
- ☒ **I will not** engage in malicious or “bad faith” reporting.
- ☒ **I will not** investigate a safeguarding matter myself or question individuals who may be involved in the matter.

4. Respond to disclosures with care and cooperate with internal processes.

- ☐ **I will** immediately inform my direct supervisor, a member of GRC, a safeguarding regional adviser or safeguarding focal point of any imminent harm to a project participant, volunteer, partner or colleague so that the proper support and care can be delivered.
- ☐ **I will** cooperate with any internal or external investigation.
- ☐ **I will** maintain confidentiality and abstain from sharing information related to a reported concern or investigation to which I may be privy.
- ☒ **I will not** ignore any signs of imminent harm, abuse or danger to a project participant, volunteer, partner or colleague.
- ☒ **I will not** coach or otherwise coordinate stories with investigation witnesses.
- ☒ **I will not** retaliate, treat poorly, or engage in harassment towards anyone who is or is suspected to be involved in a safeguarding investigation – whether a complainant, witness, or respondent.
- ☒ **I will not** withhold any information during an investigation.

I acknowledge that I have read and reviewed the safeguarding behavioural commitments and agree that I will follow them.

Signature

Date received

Name (typed or printed)

¹⁶ Disclosures include reports from program participants or others who are unfamiliar with, may not have access to, or are not comfortable with directly reporting an allegation to [HEAL](#) or other established Habitat reporting mechanism.

Appendix D: Policy Acknowledgment Form for National Organisations and Branches — Child and Adult Safeguarding Policy

Entity name: Habitat for Humanity Great Britain

Country: United Kingdom

Instructions

1. The policy acknowledgment form must be read and signed by the entity's CEO, CFO or designee. If the entity is able to comply with or meet the intent of the policy, then a copy of the policy acknowledgment form must be forwarded to the appropriate area office. The entity should maintain the original form for documentation purposes.
2. If the entity is not able to comply with or meet the intent of the policy, an exception must be requested. The exception request must be documented below and include: a) the section of the policy for which the exception is being requested, b) references to any local laws or business justifications, and c) the proposed alternative. The original of the policy acknowledgment form must be sent to the appropriate area office for review and agreement. The area office will send the original form to HFHI Internal Audit and Legal departments for final approval. The completed/approved form will be returned to the appropriate area office and the originating entity, HFHI Internal Audit, HFHI Legal department, and the area office. The entity must keep copies of the approved exception.

I hereby certify that I have read the attached policy and therefore:

- ☐ I acknowledge and confirm that the attached policy has been adopted in substance by this organisation.
- ☐ I acknowledge and confirm that the attached policy has been adopted in substance by this organisation, except for the specific paragraph(s) noted below.

Entity acknowledgment:

Henrietta Blackmore

National Director, Habitat for Humanity Great Britain



Signature

Date 18/08/2026

Nicola Barclay

Board Chair, Habitat for Humanity Great Britain



Signature

Date 12/08/2026

For exceptions: Note policy section number and text for which the exception is being requested, justification for the exception, and proposed alternative:

Name (print or type):		Department:
Signature:	Full phone number:	Date:
Recommend approval: <i>(area office officials must ensure sufficient detail is provided by the national office to support recommendation)</i>		

HFHI Legal department approval:

Name (print or type):	Department:
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Signature:	Full phone number:	Date:
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