



# **CBM Global Policy: Protection from Sexual Exploitation, Abuse and Harassment**

November 2022



**CBM Global Disability Inclusion**

Van Heuven Goedhartlaan 13D, 1181 LE Amstelveen, Netherlands

[www.cbm-global.org](http://www.cbm-global.org)

## Purpose

This policy complements the CBM Global Safeguarding of Children and Adults-at-Risk policy by addressing the spectrum of sexual abuse, i.e., sexual exploitation, sexual abuse, and sexual harassment (SEAH), as this is not covered under the safeguarding policy.

The purpose of this protection from sexual exploitation, abuse and harassment (PSEAH) policy and procedures is to promote the protection of people, especially children, adults-at-risk, and other programme participants, from any harm of sexual exploitation, sexual abuse and sexual harassment that may be caused because of their engagement with CBM Global's programmes, operations, and people. This refers to SEAH arising from:

- The conduct of CBM Global Staff (including Secretariat, Technical Teams, Country Teams), Representatives (including consultants, contractors, board members, project visitors, interns, and volunteers), and Partners.
- Uncontrolled inherent risks in the design and implementation of CBM Global's programmes and activities.

This policy also covers the protection of our staff and representatives while carrying out their responsibilities for and on behalf of CBM Global. CBM Global will actively prevent SEAH in its workplaces and projects; raise awareness on how to recognise and report concerns; and respond decisively to all reported SEAH cases with a survivor-centred approach. We will strive to create a safe, respectful, supportive, and harassment-free environment for all staff, representatives, partners, and programme participants.

This policy outlines the organisation's PSEAH commitments and informs staff and representatives of their PSEAH responsibilities.

## Scope

This is a mandatory policy that applies to **all CBM Global staff and representatives**. It is also applicable to:

- **Partner organisations.** CBM Global expects partners to equally uphold high standards of PSEAH based on the UN Convention on the Rights of the Child and the UN Convention on the Rights of Persons with Disabilities. Partners are expected to have a robust PSEAH policy in place that reflects good practice (at the minimum) on how they will prevent and respond to SEAH complaints and concerns, and their duty of care toward programme participants, their staff, and volunteers (see Governance section for details). Where partners do not have a policy in place, there is a contractual requirement for them to adopt this policy for all CBM Global projects they are involved in. CBM Global will take steps to support partners in establishing the necessary policy and procedures.
- **CBM Global's Member representatives** engaged in or with CBM Global activity, other than instances when they are working in the Member country. Members are invited to adopt the policy if they do not have a policy of a similar standard. They are requested to ensure that their existing policies align with this policy.

The policy applies both during and outside of contracted working hours, every day of the year. It will apply under the following circumstances:

- Any SEAH incident involving a CBM Global employee or representative.
- Any SEAH incident in a project managed by a CBM Global entity (i.e., Country Team or directly by a Member or Technical team).
- Any SEAH incident involving a Partner employee or representative in a CBM Global (funded) project.
- Any SEAH incident in a project that is part or wholly funded by CBM Global (this includes CBM Global Members).
- If a project is being managed by CBM International on behalf of CBM Global, CBM International must inform CBM Global, but the incident will be managed using CBM International’s policy and procedure.

The policy does not cover:

- SEAH concerns in the wider community not perpetrated by CBM Global staff, representatives, or partners.
- Non-SEAH forms of abuse e.g., discrimination, bullying and harassment. These are dealt with under CBM Global’s Safeguarding policy, its Code of Conduct and Grievance policy.
- SEAH incidents involving Member Association staff in their own countries.
- SEAH incidents involving a Partner in non-CBM Global (funded) projects. However, Partners should notify CBM Global of any SEAH incident involving their staff or volunteers on such projects and their planned responses.

## Definitions

**Protection from Sexual Exploitation and Abuse and Sexual Harassment (PSEAH)** is the term used by international humanitarian and development sector to describe the measures they take to protect people from sexual exploitation, abuse and harassment perpetrated by their own staff and associated personnel. It is now also extended to mean protecting staff and associated personnel from sexual harassment or misconduct within the workplace.

In the International humanitarian and development sector, the Core Humanitarian Standards (CHS), and the Inter-Agency Standing Committee (IASC) Minimum Operating Standards are the most widely recognised on Protection from Sexual Exploitation and Sexual Abuse and Sexual Harassment.

The SEAH definitions by these two standards have been adopted for this policy:

Abuse	Definition	Examples
<b>Sexual Exploitation</b>	Refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to,	Sex trafficking, prostitution, withholding humanitarian supplies until sexual favours are received, promising humanitarian assistance in

	<p>profiting monetarily, socially, or politically from the sexual exploitation of another. IASC (AAP/PSEA)<sup>1</sup></p> <p>It is a broad term which includes acts such as transactional sex, solicitation for transactional sex, exploitative relationship. CHS</p>	<p>exchange for a sexual relationship.</p>
<p><b>Sexual Abuse</b></p>	<p>Refers to an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. IASC (AAP/PSEA)</p> <p>It is a broad term which includes several acts, including rape, sexual assault, sex with a minor and sexual activity with a minor. CHS</p>	<p>Rape; attempted rape, which includes attempts to force someone to perform oral sex; sexual assault, which includes non-consensual kissing and touching; all sexual activities with someone under the age of consent is considered sexual abuse (The age of consent recognized by this policy is 18 years, as established by the Child’s Rights Act of 2002).</p>
<p><b>Sexual Harassment</b></p>	<p>Refers to a continuum of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, 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. IASC (AAP/PSEA)</p>	<p>Sexual harassment can be obvious or indirect, physical, or verbal, repeated or one-off and perpetrated by any person of any gender towards any person of any gender.</p> <p>Making unwanted sexual advances; making inappropriate sexual comments or jokes; sending unsolicited naked or sexually explicit images or videos to someone or making a similar demand for same.</p>

At CBM Global, we recognize that imbalance of power exists across the organisation, as well as between ourselves and our partners, and with the communities and individuals with whom we deliver projects. The risk of sexual exploitation, sexual abuse and sexual harassment exists in our workplaces, activities, and field programmes. In particular, the humanitarian context creates high risk conditions for SEAH.

<sup>1</sup> Source: \*IASC Task Team on Accountability to Affected Populations and Protection from sexual Exploitation and Abuse (AAP/PSEA)



As humanitarian actors, CBM Global staff and representatives have access to essential relief items and contact with vulnerable groups like children and adults-at-risk in the communities where we work. This invariably puts them in a position of power which increases opportunities for the abuse of power and the risk of various forms of sexual exploitation, for instance, trading relief items for sexual favours. Our staff, representatives and partners must never use their power to cause harm to others or to give themselves undue advantage. No staff or representative of CBM Global should ever abuse their position of power to sexually exploit, sexually abuse or sexually harass programme participants, community members, work colleagues or members of the public.

Equally, every CBM Global staff and representative is entitled to work in an environment that is free of all offensive behaviour of a sexual nature; no form of sexual abuse will be tolerated in the workplace.

## **PSEAH Principles**

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This policy is underpinned by the Six Core Principles relating to Sexual Exploitation and Abuse set out by the Inter-Agency Standing Committee (IASC) Working Group on Prevention and Response to Sexual Exploitation and Abuse, the committee of UN agencies and NGOs involved in the delivery of humanitarian assistance, to support agencies in implementing PSEA measures.

CBM Global has adopted these Principles and adapted them to include sexual harassment and "CBM Global Staff, Representatives and Partners", as follows:

1. Sexual exploitation, abuse, and harassment by CBM Global staff and representatives go against organisational values and Code of Conduct. SEAH constitute acts of gross misconduct and can therefore be grounds for termination of employment. Where partners are concerned, a breach of this policy will be grounds for terminating funding or partnership arrangements.
2. Sexual activity with children (persons under the age of 18) is prohibited, regardless of the age of maturity or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour by CBM Global staff and representatives is prohibited. This includes exchange of assistance that is due to programme participants.
4. Any sexual relationship between CBM Global staff or representatives and programme participants is prohibited. CBM Global recognises the inherent power imbalance in such relationships, thus constituting an abuse of power on the part of the CBM Global staff or representative involved. Such relationships undermine the credibility and integrity of CBM Global's humanitarian and development work.
5. Where a CBM Global staff or representative develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in CBM Global or not, he or she must report such concerns via the established reporting mechanisms. Those reports are not required to have proof or evidence.
6. CBM Global staff and representatives are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their

code of conduct. Managers at all levels have responsibilities to support and develop systems which maintain this environment.

## Policy Statement

CBM Global has a zero tolerance toward all forms of sexual exploitation, sexual abuse, and sexual harassment, and takes seriously any SEAH concern or allegation involving CBM Global staff, representatives, and partners.

This means that we will:

- Take proactive steps to prevent sexual exploitation, abuse, and harassment.
- Respond to every reported concern and where there is indication of a possible violation of this policy, a thorough investigation will be initiated, and appropriate disciplinary action taken as required.
- Hold all CBM Global staff and representatives up to the same standards and procedures, regardless of their position within the organisation.

In this context, it means CBM Global will put in place systems and procedures to ensure that our staff, representatives, programmes, and operations do not expose children, adults-at-risk, and programme participants to the risk of SEAH and that all SEAH concerns, or allegations raised in relation to CBM Global are appropriately responded to in a timely manner and reported to the appropriate authorities.

## PSEAH in humanitarian action

We recognise that humanitarian situations pose some of the highest risk for sexual exploitation, abuse, and harassment. These risks are higher for girls, boys and women with disabilities, the elderly and other vulnerable groups. Article 11 of the Convention of the Rights of Persons with Disabilities highlights the obligation to ensure the protection and safety of persons with disabilities in situations of risk, including armed conflict, humanitarian emergencies and natural disasters.

CBM Global will mainstream PSEAH in all stages of our humanitarian action – in disaster preparedness phase, response, and early recovery - to fulfil our duty of care.

## How to implement?

CBM Global commits to addressing PSEAH throughout its workplace, and its advocacy, advisory work, development, and humanitarian programming activities using the three-pronged approach of prevention, reporting and response.

### Prevention

- **Leadership.** Leadership is fundamental to prioritizing safeguarding-PSEAH and ensuring that it is sufficiently resourced and supported. CBM Global's leadership – the Board, Executive Director and Global Management Team – will provide high-level oversight and accountability, as well as always promote and uphold the organisation's PSEAH principles and standards, serving as role models and advocates in their function.
- **Organisational culture.** CBM Global will create and sustain an organizational culture of openness and reporting. It will ensure a safe working environment that assures the respect and safety of everyone who works for and with CBM Global, including programme

participants, partners as well as those in the communities where our programmes are delivered. CBM Global will establish trust in its communities by robustly responding to SEAH incidents, supporting victim-survivors, and holding those responsible for perpetuating acts of abuse accountable, thereby discouraging inappropriate behaviour and strengthening reporting.

- **Policies and systems.** CBM Global will develop, establish, and periodically review contextualized PSEAH policies, processes, and systems, to ensure PSEAH is well embedded across all levels within the organisation to sustain a safeguarding-PSEAH conducive culture.
- **Safer recruitment.** CBM Global will have a rigorous recruitment and selection process in place to deter, identify and reject individuals who are deemed to be at risk of causing harm to children and vulnerable people. This includes, but is not limited to, obtaining references, and conducting background / criminal record checks on potential new hires and including safeguarding-PSEAH responsibilities in every job role and job description, especially those with direct or indirect contact with children and adults-at-risk. CBM Global will also collaborate with wider interagency/sectorial initiatives, like the enhanced screening and information sharing mechanisms for new recruits - to the extent that it is relevant to its operations and legal boundaries - to improve its capacity to prevent, eliminate and respond to all types of abuse or threats of abuse in its work.
- **Safer programming.** CBM Global will adopt a risk-informed programming approach that ensures our capacity to effectively prevent and respond to SEAH incidents in a culturally sensitive manner is strengthened and adequately resourced. Safeguarding-PSEAH risk assessments and planning will be carried out on all proposed project designs and proposals to proactively reduce inherent risks of harm or abuse posed to children, vulnerable adults, programme participants, staff, and representatives of CBM Global.
- **Partner assessment.** CBM Global will actively promote PSEAH to partners and require them to align with the PSEAH principles and standards set out in this policy and its associated policies. Partnership safeguarding assessments that address SEAH will be an integral part of our due diligence process in partner selection. Initial assessments and reviews will be carried out in a collaborative and supportive manner with potential partners and existing ones respectively, to ensure their safeguarding-PSEAH practices are appropriate and adequate in terms of their operational size, required expertise and level of engagement on CBM Global projects.
- **Contracts.** CBM Global will ensure that all contractual agreements entered into with individuals and enterprises incorporate this CBM Global PSEAH policy; are clear about CBM Global's safeguarding-PSEAH obligations as a development and humanitarian agency, and its expectation that contracting parties will abide by and uphold CBM Global's PSEAH principles and standards; articulate that a breach of the policy - by failing to adequately prevent or respond to sexual exploitation, abuse and harassment, including investigating reported incidents - will constitute grounds for the termination of their contracts with CBM Global. In consortium arrangements, CBM Global commits to work collaboratively with other consortium members to develop and implement a PSEAH framework in the best interest of the vulnerable groups, including children and adults-at-risk, within the target population.
- **Communication.** CBM Global will actively, on a regular basis communicate its global PSEAH policy and associated policies to all stakeholders, including the Board, staff, interns, volunteers, partners, programme participants, service providers and community

members. Awareness will be raised across the organization and its project communities about what constitutes appropriate behaviour for CBM Global staff and representatives, and how to identify and report inappropriate behaviour using safe, confidential, and accessible complaints mechanisms. Care will be taken to ensure that communication materials and media outlets are diverse, inclusive, and appropriate for the intended audience. The CBM Global PSEAH policy and other necessary guidance documents will be translated into local languages, illustrated in child-friendly and culturally sensitive formats. Appropriate language will be used so that young children and non-literate persons can easily understand. The policies will also be made available in accessible formats, such as clear print, easy read etc.

- **Research, media, and social media.** CBM Global will follow ethical and protective principles to ensure that children and adults are represented in a dignified way, that their participation is not exploitative, and that people and organisations do not use photographs and related information beyond the agreed purposes and consent. CBM Global's guidelines on Use of Media, social media and other relevant policies will apply.
- **Training.** CBM Global will ensure that all members of the Board, staff and representatives regularly receive appropriate safeguarding-PSEAH briefing, training and refresher courses relevant to their roles, responsibilities, the technical programmes they are involved in and the nature of their engagement with children, adults-at-risk, and programme participants. Mandatory safeguarding-PSEAH training and briefing such as inductions for new hires will be available for all levels of staff, interns, volunteers, and Board members. Advanced safeguarding-PSEAH training will be available for roles that pose medium to high risk levels, such as programme managers, country safeguarding focal points, project officers, HR, and recruitment officers etc.

## Reporting

CBM Global will ensure there are safe and appropriate multiple pathways in place to report safeguarding-PSEAH concerns for staff, programme participants, partners, and members of the public.

- CBM Global will work with partners to ensure they develop and establish community-based reporting mechanisms in consultation with project communities. This way, reporting barriers are identified and reporting systems designed to be accessible, confidential, safe and age- as well as culturally- appropriate.
- Information on safeguarding-PSEAH will be made widely available in a variety of accessible formats at all CBM Global offices. Likewise, partners will ensure their PSEAH policies and reporting systems are communicated and readily accessible in all communities where we work. This way, people are clear on what to report, how to report, whom to report to and what actions they can expect CBM Global to take once an incident is reported.
- CBM Global will ensure that people who report understand that whatever information they share will be treated confidentially and that every possible effort will be made to protect them from reprisals.
- Frontline staff, safeguarding focal points and others who receive safeguarding-SEAH complaints will be trained and supported to carry out their duties in a professional, non-judgmental, and culturally sensitive manner, with due regard for confidentiality and data protection requirements. They will also be trained on the survivor-centred approach to responding to sexual violence.



- CBM Global **does not require** proof or evidence from persons raising safeguarding-SEAH concerns or complaints. Any person can raise a concern or complaint they have heard about, witnessed, or experienced relating to a CBM Global staff, representative or partner without fear of reprisal.
- CBM Global staff and representatives **must not** conduct investigations on their own; their duty is to report to a safeguarding focal point or a senior team member.

CBM Global staff, representatives, programme participants, partners and community members can report, in writing or verbally, suspected or confirmed cases of sexual exploitation, sexual abuse and sexual harassment through any one of these established pathways:

1. Notify, in writing or verbally (face-to-face or by telephone), the nearest Safeguarding Focal Point, HR officer, Project officer or member of your country senior management team.
2. Notify CBM Global's Global Safeguarding Manager at [safeguarding@cbm-global.org](mailto:safeguarding@cbm-global.org)
3. Report online using any of these links:
  - a. [cbm-global.ethicspoint.com](https://cbm-global.ethicspoint.com)
  - b. From your mobile phone: [cbm-globalmobile.ethicspoint.com](https://cbm-globalmobile.ethicspoint.com)
4. Use the anonymous whistleblower email address: [whistleblowing@cbm-global.org](mailto:whistleblowing@cbm-global.org)

CBM Global recognizes that sometimes, persons who wish to report a safeguarding concern may feel more comfortable doing so outside these identified pathways. All reported cases, regardless of how they are reported, will be treated seriously.

### **Responding to PSEAH complaints: Survivor-centred approach**

CBM Global considers victim-blaming unacceptable and will make sure all reported safeguarding-SEAH concerns, and complaints are taken seriously and addressed in a timely and professional manner, using the survivor-centred approach to ensure the safety and well-being of victim-survivors, and that their dignity and human rights are upheld throughout the process.

A comprehensive and agile incident management system will be consistently maintained across the organization, with consideration for local statutory and legal requirements. CBM Global will provide appropriate support to victim-survivors of sexual exploitation, abuse and harassment perpetrated by CBM Global staff and representatives. This will include medical care, psychosocial support, and legal assistance. SEAH Survivors will also have access to specialized support services.

All staff and representatives will be able to access the organisation's Employee Assistance Programme (EAP) and details can be obtained through the country HR or Safeguarding Focal Point.

- All reported incidents will be officially acknowledged within 48 hours of receiving the complaint and the country Safeguarding Focal Point will initiate the Safeguarding Committee to assess the case to determine next steps and whether further investigation is required. Relevant Members and Donors will be notified of any an incident that occurs in their project, based on agreed terms, and receive updates throughout the case management cycle.

- CBM Global will prioritize victim-survivor support, ensuring that the support provided is timely, appropriate with consideration for culture, gender, and religion, and delivered by qualified professionals. We will put survivors at the centre of our decision-making process by keeping them informed and consulted on matters that affect them. Appropriate support and care will also be provided to the Subject of Complaint and witnesses to ensure the wellbeing of everyone involved.
- All investigations will be risk assessed with consideration for the safety of all individuals involved and delivered in a timely and professional manner by qualified PSEAH investigators guided by a case-specific Terms of Reference.
- CBM Global will employ a survivor-centred approach to decisively implement risk-assessed recommendations from investigations and disciplinary hearing findings.
- The outcome of investigations and disciplinary hearings will be shared on a need-to-know basis with relevant parties. Donors and Regulatory agencies where necessary will also be notified.
- CBM Global will maintain a versatile case management database that is secure and confidential, to ensure quality assurance, accountability, and data protection compliance.
- CBM Global will maintain a learning posture by putting in place systems to review the management of safeguarding-PSEAH incidents. Learnings will be used to revise and improve existing processes and policies.

## **Governance and Accountability**

### **Policy review**

This policy will be reviewed annually to ensure it is up to date and reflective of any changes that may have occurred with regards to CBM Global's activities or legal, regulatory and/or sectorial safeguarding-PSEAH standards.

### **Policy Adaptation**

While this is a global policy, where necessary, the policy and its appendices can be contextualised by CBM Global Country Teams to fit the local legal and cultural context, without diluting it. Any adaptations besides language translations will be in consultation with the Global Safeguarding Manager, who will facilitate internal mechanisms for approval of the adaptations.

### **Policy implementation reporting**

The Global Safeguarding Manager will submit an annual report to the Global Management Team and Board, on implementation progress across the organisation and on safeguarding and PSEAH concerns and developments within the year.

Country Teams will develop a three-year Safeguarding-PSEAH action plan that is reviewed and submitted annually to the Global Safeguarding Committee. The annual review ensures the policy is updated with relevant learning from the year's treated cases and significant changes that may have occurred in the project or country.

### **Roles and Responsibilities**

At CBM Global, we believe PSEAH is everyone's responsibility.

A breach of this policy or any of its associated policies may constitute gross misconduct resulting in disciplinary actions against individuals, and for organisations, termination of contracts and/or funding.

### **All CBM Global Staff and representatives**

- Have a responsibility to uphold CBM Global's PSEAH policy and its associated policy, including the Code of Conduct. They must read and sign a copy of this policy on taking up their work assignment at CBM Global or any of its entities.
- Have a mandatory obligation to prevent, report and respond to all forms of sexual exploitation, abuse, and harassment.
- Must know and consider the power they (CBM Global staff) hold because of their position at CBM Global and take care not to abuse it by treating everyone with respect.
- Must actively seek the support and guidance of a senior colleague when i) unsure of what to do after witnessing an incident or behavior that does not seem right, or ii) uncertain about whether what they witnessed is a PSEAH issue.
- Must not seek to retaliate or retaliate against complainants, victim-survivors and witnesses involved in a SEAH incident.

### **Country Safeguarding Focal Points**

- Provide support to Country programmes to prevent and respond to safeguarding-PSEAH incidents and concerns.
- Escalate incident reports appropriately and seek additional support as needed when managing incidents.
- Raise awareness and promote best practices in safeguarding-PSEAH through trainings, briefings and regular communication with in-country teams and stakeholders.

### **Managers**

- Promote a culture of respect and inclusion to help prevent sexual exploitation, abuse, and harassment by providing a safe work environment where staff trust the reporting systems and know their concerns will be treated seriously and appropriate action taken.
- Ensure line reports understand their mandatory duty to report any PSEAH concern they become aware of or suspect.
- Ensure due diligence checks on potential hires to prevent recruitment of offenders.
- Ensure PSEAH elements are in job descriptions, interview adverts, interview questions and assessments.

### **Programme Teams**

- Collaborate with relevant colleagues to complete or/and ensure completion of, and subsequently review/update, all safeguarding risk assessments i.e., country context analysis, partnership safeguarding assessments and project safeguarding risk assessments.
- Assess inherent safeguarding-PSEAH risks in proposed project activities, beneficiary engagement and location context, and build in sufficient protection, prevention, reporting and response mechanisms to address identified risks.
- Analyse the safeguarding roles, capacities, processes, and activities required to effectively support projects and allocate resources appropriately in budgets.

- Ensure CBM Global's safeguarding-PSEAH obligations, expectations and considerations are fully embedded and costed in bid proposals, concept notes and other project development activities and communication.
- Support and monitor partner organisations' safeguarding-PSEAH obligations and commitments to ensure they are met and are consistently in alignment with CBM Global's principles.

### **Partner organisations**

CBM Global expects its partners to either have, or to develop within an agreed timeframe, a PSEAH policy, which is in line with the UN Convention on the Rights of the Child and the UN Convention on the Rights of Persons with Disabilities.

- Have a PSEAH framework that clearly communicates the organisation's PSEAH commitment, how it will prevent and respond to SEAH concerns and how programme participants and stakeholders can report.
- Design and establish in consultation with programme participants and community leaders, a safe, accessible, culturally appropriate, confidential community-based reporting mechanisms.
- Report all SEAH incidents related to CBM Global projects promptly to the country Programme Manager, Safeguarding Focal Point, or senior member of the Country Team.
- Support Country programme team to carry out safeguarding risk assessments and map SEAH-survivor support services and referral pathways in the community/region.
- Provide appropriate training and briefing for staff, programme participants and community members to raise awareness on PSEAH, and how to identify and report concerns safely and confidentially.

### **Country Directors**

- Accountable for PSEAH and the implementation of a contextualised PSEAH policy in-country.
- Ensure all safeguarding risk assessments for projects and partners are completed on time and appropriate budget allocations made to carry out mitigation action plans.
- Support Safeguarding focal points and committees to effectively carry out their roles.
- Ensure appropriate and competent safeguarding-SEAH survivor support services are researched and made available in-country.
- Ensure that established complaints handling and investigation procedures have capacity to manage safeguarding-SEAH incidents, along with appropriate disciplinary procedures where required.
- Ensure timely submission of all country safeguarding-PSEAH data and reports.

### **Global Management Team**

The Executive Director and all other members of the Global Management Team are accountable to the Board for the implementation of the CBM Global PSEAH Policy across the organisation. They will:

- Stay informed and knowledgeable about the organisation's progress on safeguarding-PSEAH against sectorial standards and legal obligations.
- Check that CBM Global's PSEAH policy and procedures are fit for purpose and up to date.
- Ensure all CBM Global staff and representatives are aware of their safeguarding-PSEAH responsibilities and know how to report and respond to concerns.

- Ensure partners and others funded by CBM Global have adequate safeguarding-PSEAH policies and procedures in place.
- Ensure reported incidents are taken seriously and managed effectively with openness and transparency, and records stored securely.
- Ensure the safeguarding-PSEAH agenda and action plans are adequately resourced and budgeted for.
- Report serious safeguarding-PSEAH incidents to Regulatory bodies.

### **Board Safeguarding lead**

- Champion safeguarding-PSEAH throughout CBM Global.
- Support the Board to develop their individual and collective understanding of safeguarding-PSEAH.
- Ensure the annual review of safeguarding-PSEAH policies and procedures, and that these are presented to the Board.
- Ensure the organisational strategic plan reflects statutory and sectorial safeguarding-PSEAH standards specific to CBM Global's activities.
- Work regularly with the Executive Director and Global Safeguarding Manager to review CBM Global's safeguarding-PSEAH practices, whether they are creating a safer culture and work environment that keep people safe.
- Work with the Executive Director, Global Safeguarding Manager and Communications team to manage all serious safeguarding-SEAH incidents.

### **Board of Directors**

The Board is ultimately accountable for the CBM Global Safeguarding and PSEAH Policies. Key responsibilities for board members include:

- Review and approve Safeguarding-PSEAH policies.
- Support the Board Safeguarding Lead role.
- Hold the Global Management Team to account to implement the Safeguarding and PSEAH policies with diligence.
- Receive and review Safeguarding-PSEAH reports on a regular basis.

## **Reference Documents**

- CBM Global Code of Conduct
- CBM Global Safeguarding of Children and Adults-at-Risk Policy
- Safeguarding - PSEAH incident management process and flowchart (to be made available)
- Safeguarding-PSEAH Procedures
- CBM Global Whistleblowing Policy