

# CBM Global Policy

## Safeguarding

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**CBM Global Disability Inclusion**

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<https://cbm-global.org>

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# Introduction and Purpose

Safeguarding is a broad term that CBM Global uses to describe the organisation's policies, procedures and practices designed to prevent and protect those who come into contact with its programmes, people, and operations from all forms of harm and abuse, including child abuse, sexual exploitation, abuse and harassment (SEAH) caused by staff, partners, volunteers, interns, Board members, associated personnel, operations or programmes.

CBM Global is committed to upholding and maintaining the highest standards of behaviour and integrity and its commitment to safeguarding complies with the values that shape its culture.

This policy is informed by and committed to the principles laid out in the [UN Convention on the Rights of the Child](#), the [UN Convention on the Rights of Persons with Disabilities](#), the [1993 UN Declaration on the Elimination of Violence against Women](#) and the [UN Humanitarian Principles](#).

CBM Global is an advocate for following best practice in preventing and addressing safeguarding concerns through a disability inclusive safeguarding approach. Safeguarding is everyone's responsibility and the duty to safeguard others, to promote safeguarding practice in our work and to ensure that our safeguarding practice is disability inclusive applies without exception to anyone associated with CBM Global.

Safeguarding incidents are always rooted in an imbalance of power, particularly gendered and sexualized abuses of power. CBM Global has a zero-tolerance approach to all forms of abuse, exploitation and harassment. Zero tolerance means we actively encourage reports, we take all concerns seriously, we carry out timely and robust responses to allegations of harm and abuse and sanction even minor infringements of this policy

The **purpose** of this policy is to:

- Set out the position of CBM Global on the prevention of and protection from all forms of abuse, exploitation and harassment
- Set out responsibilities and procedures to be followed in order to prevent abuse happening in the first place
- Set out responsibilities and procedures to be followed where suspicion, allegation or actual harm has happened.

## Policy Statement

CBM Global believes that anyone who comes into contact with its staff and representatives, programmes and operations should be protected from harm, exploitation, abuse or harassment regardless of their age, gender identity, disability, belief, sexual orientation, ethnic origin and other status.

At CBM Global we are committed to doing all we can to keep everyone connected with our work safe by embedding disability inclusive safeguarding in all our work.

This means that we will:

- Take proactive steps to consult with programme participants, including people with disabilities and underrepresented groups in order to prevent exploitation, abuse and harassment happening.
- Respond to every reported concern and where there is an indication of a possible violation of this policy, investigate.
- Ensure that where employees of CBM Global, and/or members of the Board commit a safeguarding violation or fail to report knowledge of a safeguarding violation disciplinary action will be taken up to and including termination of employment or board membership.
- Terminate the contract and/or agreement of third parties who fail to comply with this policy.
- Where required and if it is safe to do so we will refer safeguarding violations to law enforcement and other authorities in line with survivor centred principles.

## Scope

Compliance with this policy is mandatory for all CBM Global staff, partners, volunteers, interns, board members and related third parties. This includes persons travelling on CBM Global business, including CBM Global Members, consultants, contractors and programme visitors (including donors, celebrities and journalists).

CBM Global Members are expected to ensure that their own safeguarding policies align with this policy.

CBM Global's Safeguarding Policy and its [Safeguarding Commitments](#) apply both inside and outside the contracted working hours, every day of the year.

This policy covers:

- Any safeguarding concern, suspicion or incident involving a CBM Global employee, board member or representative;
- Any safeguarding concern, suspicion or incident in a project funded by a CBM Global entity;
- Any safeguarding incident involving a Partner employee or representative whose role receives funding from CBM Global, or who was working on a CBM Global funded project, at the time of the incident.

The policy does not cover:

- Safeguarding and protection concerns in the wider community not perpetrated by CBM Global staff, representatives or partners;
- Safeguarding incidents involving CBM Global Federation Member staff in their own countries;
- Safeguarding incidents involving a partner in a non-CBM Global funded project. However, partners are expected to notify CBM Global of any safeguarding incident involving their staff or volunteers on such projects or within the wider community and their planned responses.

## **Children**

Children all over the world are at risk of encountering harm and abuse in their lives. The dependency of children on adults increases the likelihood of or exposure to harm and abuse, and children with disabilities are at greater risk than their nondisabled peers.

CBM Global believes that children should never experience abuse of any kind and that we have a responsibility to promote the welfare of all children, to keep them safe and to protect them from harm.

CBM Global will ensure that the particular risks of exploitation, abuse and harassment facing children who come into contact with our programmes will be properly assessed, addressed and monitored. Where programmes are aimed at children CBM Global will ensure with its partners that the welfare of the child is paramount in all decisions taken and that safeguarding measures are designed with and for children.

## **People with disabilities and adults at-risk**

CBM Global's commitment to an inclusive world in which all people with disabilities enjoy their human rights and achieve their full potential mandates us to proactively protect and promote the rights of people with disabilities and at-risk adults through our safeguarding approach.

Deep rooted stigma and discriminatory attitudes around disability increase the likelihood that people with disabilities and adults at risk will encounter exploitation, abuse and harassment. Other factors that increase vulnerability include communication barriers, dependence on families and carers, isolation, lack of access to sexual reproductive health information and education, difficulty in protecting oneself, etc.

CBM Global will ensure that the risks of exploitation, abuse and harassment facing people with disabilities who come into contact with our programmes will be properly assessed, addressed and monitored and that safeguarding measures are designed with and for people with disabilities and adults at risk.

## **Protection from Sexual Exploitation, Abuse and Harassment (PSEAH)**

SEAH stands for 'sexual exploitation, abuse and harassment'. All three are unacceptable abuses of power. SEAH is rooted in power imbalances, be it in our programmes, our workplace or online. Victim/survivors of SEAH usually have less power or are more marginalised than perpetrators. Women and girls are most often affected, and women and girls with disabilities are at further increased risk.

Acts of SEAH undermine the integrity and impact of CBM Global's work. CBM Global has a zero-tolerance approach to SEAH and is committed to tackling all harmful and unwanted sexual behaviour perpetrated by anyone associated with its work.

CBM Global has endorsed and is committed to the [Common Approach to Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment \(CAPSEAH\)](#) and will apply its principles to its safeguarding approach.

# Roles and Responsibilities

## All CBM Global staff and representatives

All CBM Global staff and representatives share a responsibility to ensure a safe and protective environment where harm, exploitation, abuse and harassment are effectively prevented as far as reasonably possible. This includes adhering to the highest standards of workplace behaviour to ensure a safe environment free from any kind of harassment, including sexual harassment and bullying.

CBM Global staff and representatives have a mandatory obligation to report all safeguarding concerns, suspicions and actual incidents. Failure to do so will result in disciplinary action up to and including the possibility of termination of employment or termination of the violating party's contract and/or business relationship with CBM Global.

It is the responsibility of all CBM Global staff and representatives to uphold CBM Global's Safeguarding Policy and its [Safeguarding Commitments](#) both in-person and on-line, inside and outside of working hours.

## Managers

As well as upholding CBM Global's Safeguarding Policy and its [Safeguarding Commitments](#) themselves, managers at all levels are responsible for ensuring their line reports and other representatives for whom they are responsible are aware of the policy, receive regular safeguarding training commensurate with their role and are supported to implement and work in accordance with it.

Managers are responsible for developing and supporting an environment in which project participants, staff, partners and other representatives know how CBM Global expects them to behave and take action where they fail to meet those expectations.

Managers should take the lead on promoting a culture of respect and inclusion by ensuring a safe work environment where staff trust the reporting systems and know their concerns will be treated seriously and appropriate action will be taken.

## Country Directors

Country Directors are accountable for the implementation of the CBM Global safeguarding framework within projects implemented within their countries and within their own country teams.

They have a responsibility to role model and promote a robust safeguarding culture, acting where there is any indication of a violation of this policy no matter how minor.

Country Directors should ensure they are fully informed, that the safeguarding measures in place in projects are adequate, well-resourced and budgeted for and that Safeguarding Focal Points are supported to effectively carry out their roles.

## Country Safeguarding Focal Points

Country Safeguarding Focal Points will support CBM Global project teams to raise awareness and promote a disability inclusive safeguarding approach. They have a responsibility to immediately refer all and any incident reports to the Global Safeguarding Manager who will provide support in responding as appropriate. The role of the Country Safeguarding Focal

Point is not an expert role but one that works collaboratively across project teams with the support of the Global Safeguarding Manager.

## **Project Teams**

Project teams are responsible for ensuring that CBM Global safeguarding standards are met within all projects associated with CBM Global. They are expected to work closely with Partners, CBM Global Technical Teams and CBM Global Member Teams to assess and manage safeguarding risk across all stages of the programme cycle, seeking expert support and advice where appropriate.

Project teams are responsible for assessing, monitoring and supporting partner organisations to meet CBM Global safeguarding standards and to ensure they are effectively implemented in all projects associated with CBM Global.

## **Partner Organisations**

CBM Global will assess all partners' safeguarding frameworks as part of its due diligence process. Where partners do not meet CBM Global safeguarding standards partners will be expected to address these areas within an agreed timeframe.

CBM Global expects partner organisations to uphold its Safeguarding Policy and adhere to its [Safeguarding Commitments](#).

Partner Organisations are required to report all safeguarding concerns, suspicions and incidents related to CBM Global funded projects or activities related to staff that are funded (partially or fully) by CBM Global to the CBM Global Country Programme Manager, Country Safeguarding Focal Point or senior member of the Country Project Team within 48 hours. Failure to do so may result in the termination of contract with CBM Global.

## **Global Safeguarding Manager**

The Global Safeguarding Manager is responsible for the monitoring, maintenance and implementation of CBM Global's safeguarding framework, and for ensuring the CBM Global's safeguarding standards meet sector standards, are disability inclusive and are robustly enforced.

The Global Safeguarding Manager will oversee the investigation and management of all safeguarding incidents ensuring a survivor centred approach.

The Global Safeguarding Manager is responsible for the ongoing safeguarding capacity building and professional development of Country Safeguarding Focal points.

## **Global Management Team**

The Executive Director, supported by the Global Management Team, is accountable to the CBM Global Board for ensuring the effective implementation of this policy and ensuring that everyone linked with CBM Global is equipped and supported to meet their safeguarding responsibilities.

## **Board of Directors**

The Board of Directors is ultimately responsible for the CBM Global Safeguarding Policy. They will hold the Executive Director and Global Management Team to account to ensure diligent implementation of this Policy.

## Board Safeguarding Lead

The Board Safeguarding Lead will champion safeguarding throughout CBM Global, supporting the Board of Directors to develop their own individual and collective understanding of safeguarding. The Board Safeguarding Lead will support and challenge the Executive Director and Global Safeguarding Manager to ensure they are continuously striving to achieve safeguarding excellence in all areas of our work.

## Reporting and Responding to Concerns

A safeguarding concern can be any concern of harm, exploitation or abuse that has occurred or will occur if no action is taken.

All concerns can be reported via the following mechanisms:

- Report directly to the Country Safeguarding Focal Point or a CBM Global staff member;
- Report a concern to the safeguarding mailbox, managed by the Global Safeguarding Manager, Global Head of Human Resources and the International Director - [safeguarding@cbm-global.org](mailto:safeguarding@cbm-global.org);
- Via our online [safeguarding reporting platform](#) hosted by EthicsPoint. Concerns raised here can be done so anonymously and toll-free phone lines are available.

CBM Global will ensure that reporting and incident management procedures to handle safeguarding concerns are in place and effectively used to enable safe and effective response.

CBM Global will handle all reports and information therein with the strict confidentiality and will do all it can to protect the identity of the individuals concerned.

CBM Global will adhere to Survivor Centred principles of safety, confidentiality, dignity and non-discrimination in its response to a safeguarding report.

## Safeguarding Commitments

CBM Global's ability to achieve its vision and mission requires commitment from all CBM Global employees and representatives. Everyone associated with CBM Global must uphold and promote the highest standards of ethical and professional conduct and abide by CBM Global's policies.

CBM Global Safeguarding Commitments establish the behaviours that CBM Global employees and representatives are expected to commit to and hold themselves and others accountable to both in person and online, inside and outside of working hours. Any violation of the Safeguarding Policy and its Safeguarding Commitments are a serious concern and may result in disciplinary action, up to and including dismissal or cancellation of contract.

### 1. As a CBM Global employee or representative I WILL:

- 1.1 Create and maintain a safe and protective environment that prevents, opposes and combats sexual exploitation, sexual harassment and all types of harm and abuse.
- 1.2 Build professional and respectful working relationships with colleagues considering the power I hold and how that power might be perceived.



- 1.3 I understand that sexual or romantic relationships with colleagues, especially where a power differential exists are strongly discouraged. In the event, the relationship will be declared to my line manager at the earliest opportunity to ensure the protection of those with less power and the prevention of conflict of interest.
- 1.4 Treat everyone with dignity and respect and challenge attitudes and behaviours that contravene the CBM Global Safeguarding Policy.
- 1.5 Immediately report any concerns I have regarding possible violations of the CBM Global Safeguarding Policy and the CBM Global Code of Conduct whether by a CBM Global employee or representative. I understand that my failure to report any concerns may lead to disciplinary action.
- 1.6 Maintain confidentiality about any concerns reported or information I am aware of and only share information with staff of the appropriate function who need to know such information. I understand that I am violating this policy if I carry out any investigation that has not been authorised by CBM's Global Safeguarding Manager or CBM Global's International Director.
- 1.7 Fully cooperate in any investigation where it has been alleged that I have acted in a way that is a violation of the CBM Global Safeguarding Policy and the CBM Global Code of Conduct.
- 1.8 Disclose to CBM Global any criminal conviction/proceedings that relates to allegations made against me of sexual harassment, exploitation or abuse of any kind including child abuse.
- 1.9 Only photograph, film or interview a project participant when explicitly tasked as part of my role with the approval of management. I will adhere to all requirements of CBM Global's Social Media Guidelines, Data Protection Policy and the requirements for informed consent.
- 1.10 Participate in mandatory safeguarding trainings.
- 1.11 Abide by all applicable laws where I work including child protection and child labour laws.

## **2. As a CBM Global employee or representative I WILL NOT:**

- 2.1 Act in a way that violates CBM Global's Safeguarding Policy and Code of Conduct, putting CBM Global's programme participants, community members, employees, partners or representatives at risk of harm or abuse.
- 2.2 Exploit, abuse, harass, intimidate, bully or threaten anyone, understanding that these behaviours constitute acts of gross misconduct and are therefore grounds for disciplinary action, up to and including dismissal.
- 2.3 Make sexually suggestive comments or send sexualised messages. I understand that 'banter' or 'joking' will not be accepted as defence.
- 2.4 Act in ways intended to shame, humiliate, belittle, degrade or otherwise perpetrate any form of bullying, discriminatory or emotional abuse.
- 2.5 Deliberately physically harm anyone however slight.
- 2.6 Exchange or imply the exchange of payment, employment, workplace promotion, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. I understand this means I will not exchange money, merchandise, resources or special favour/assistance for sex from anyone at any time and that this includes sex with sex workers.

- 2.7 Engage in a sexual or romantic relationship with a project participant or member of a community where CBM Global programmes are implemented. I understand that if I am part of the same community and I have an existing relationship within my community I must declare this relationship to management and that under no circumstances are any sexual activities with a child (person under the age of 18) allowed.
- 2.8 Support or take part in any form of sexually exploitative or abusive activities or harmful practices including for example, producing or distributing sexualised images, human trafficking, female genital mutilation, child marriage and forced marriage.
- 2.9 Use any form of technology to exploit, or harass another person or to access, view, create, download or distribute indecent images.

## **Children and Adults at Risk**

### **3. As a CBM Global employee or representative I WILL:**

- 3.1 Ensure that in all actions concerning children and adults at risk the best interest of the child/adult at risk will be the primary consideration and that views of the child/adult at risk will be given due weight in accordance with age/maturity/capacity.
- 3.2 Ensure that when interacting with children and adults at risk I will apply the 'Two Adult Rule' and ensure that another adult is always present or within reach.
- 3.3 Use positive, non-violent methods when interacting with children and adults at risk.
- 3.4 Help create an environment that is safe, positive and encouraging where children and adults at risk are listened to and respected as individuals.

### **4. As a CBM Global employee or representative I WILL NOT:**

- 4.1 Engage in any form of sexual activity or develop intimate relationships with adults at risk or children (persons under the age of 18) regardless of the age of consent locally. I understand that ignorance or mistaken belief in the age of a child will not be accepted as a defence.
- 4.2 Condone or in any way force a child or adult at risk to participate in any form of sexual activity, real or simulated on the internet or in any other medium.
- 4.3 Make sexually suggestive comments or send inappropriate messages, touch or sexually harass a child or adult at risk.
- 4.4 Touch, hold, kiss or cuddle a child or adult at risk in an inappropriate way or engage in activities involving close body contact beyond professional requirement.
- 4.5 Marry a person below the age of 18 regardless of the age of consent or local custom.
- 4.6 Do things for a child or adult at risk of a personal nature that they can do for themselves (e.g. dressing, toileting).
- 4.7 Hit or otherwise physically abuse a child or adult at risk or use any kind of corporal punishment.
- 4.8 Condone or participate in behaviour with a child or adult at risk that is illegal, unsafe, or abusive including being part of traditional practices, spiritual ritualistic or substance abuse.

- 4.9 Act in ways intended to shame, humiliate, belittle or degrade a child or adult at risk or otherwise perpetrate any form of emotional abuse.
- 4.10 Promote any form of child labour or recruit children for any labour which is inappropriate to their age or developmental stage which interferes with their time available for education and recreational activities or which place them at risk of injury.
- 4.11 Spend excessive time alone with a child or adult at risk away from others behind closed doors or in a secluded area (in line with the Two Adult Rule).
- 4.12 Allow children or adults at risk into a private residence that are not accompanied by a parent/carer unless they are at immediate risk of injury or physical danger.
- 4.13 Sleep in the same bed or in the same room as a child or adult at risk or allow them to stay overnight.
- 4.14 Take a child or adult at risk alone in a vehicle unless absolutely necessary and only with the consent of parent/guardian and managerial consent.
- 4.15 Supply alcohol or other harmful substances to a child or adult at risk.
- 4.16 Communicate with a child or adult at risk via digital platforms (e.g., Facebook, Snapchat, Instagram), mobile technology (WhatsApp, texting, Facebook Messenger) or online without consent and knowledge of a parent/caregiver and express permission from my line manager.
- 4.17 Agree with a child or adult at risk to keep a secret which has implications for their safety or the safety of others.

**By signing this document, I agree:**

- To comply with CBM Global's Safeguarding Policy and its Safeguarding Commitments;
- To report any safeguarding concerns, suspicions or incidents immediately;
- To model and promote CBM Global's safeguarding standards and values.

**I confirm that I have read and understood CBM Global's Safeguarding Policy and its Safeguarding Commitments.**

**Signature:**

**Name:**

**Date:**

# Key references and supporting documents

All documents mentioned above are available to CBM Global Federation staff on [Global Connect](#). Documents that are relevant for external audiences can be found on [www.cbm-global.org](http://www.cbm-global.org).

## Policies

- CBM Global Whistleblowing Policy
- CBM Global Code of Conduct
- CBM Global Data Protection Policy

## Guidelines

- Safeguarding – PSEAH Procedures
- CBM Global Social Media Guidelines

# Annex

## Safeguarding definitions and glossary

Term	Explanation	Examples
Child	The term 'child' has the specific legal meaning of anyone below the age of 18 years as defined by the <a href="#">United Nations Convention of the Rights of the Child 1989</a> .	
Adult	The term refers to anyone aged 18 years and over.	
Adult at risk	A person over the age of 18 who has care and support needs due to their age, frailty, mental or physical health, physical or learning disabilities which puts them at risk of exploitation and abuse and who is unable to protect themselves against harm, exploitation and abuse or the risk of it. ( <a href="#">Care Act 2014</a> )	
Abuse	Abuse occurs when an individual or individuals hurt another adult or child, either physically or mentally. In the majority of cases, the abuser is someone known to the survivor such as a parent, or caregiver, relative or friend. Abuse can be intentional or unintentional. There are several forms of abuse including:	

Term	Explanation	Examples
Physical abuse	Physical abuse is causing deliberate injury to a person, however slight. Physical harm may also be caused through the misuse of restraint or inappropriate sanctions (for example, corporal punishment).	Hitting, shaking, biting, burning.
Emotional / psychological abuse	Emotional/psychological abuse is the emotional ill-treatment of a person that adversely affects their wellbeing or development. Some level of emotional abuse is involved in all types of ill treatment, though it may occur alone.	Threats of abandonment, humiliation, controlling, verbal abuse, isolation
Neglect	Neglect is the continuing failure to prevent harm that damages or impairs health and/or development by not meeting a person's basic physical and/or psychological needs. Professional judgement is needed to decide whether the experience of neglect is intentional or due to material deprivation and economic circumstances.	Ignoring medical or physical care needs, failure to provide access to education, health and social care services, withholding medication, inadequate nutrition, hygiene, heating.
Financial abuse	Financial abuse is the theft or misuse of money, property or personal belongings of vulnerable person, taken without consent or under pressure in connection with wills, property or inheritance.	Withholding a staff or volunteer's pay without any policy-backed formal documented justification, money being withdrawn or stolen, goods or services being purchased in someone's name without their consent.

Term	Explanation	Examples
Discriminatory abuse	Discriminatory abuse is repeated, ongoing or widespread discrimination due to a person's age, sex, gender, disability, racial heritage, religious belief, sexual orientation, appearance or cultural background, marriage or civil partnership, pregnancy and maternity.	Unfair or less favourable treatment, sexual or gender preference, slurs, harassment, name-calling, breaches of civil liberties, and unequal access to health or social care.
Bullying	Offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the person being bullied. Bullying behaviour, though it can occur in isolated incidences, typically follows a pattern of persistent or intimidating actions.	Spreading rumours, verbally abusing or undermining someone in front of others, shouting, excluding someone from conversations or events or ignoring their views, passive aggressive responses and silent treatment, withholding information, blocking promotion or training opportunities, giving unmanageable workload or setting unreasonable deadlines with the purpose of setting them up to fail, overbearing supervision or constant criticism, sabotage, physical abuse, etc.
Child labour	Children prematurely leading adult lives, working long hours for low wages under conditions damaging to their health, their physical and mental development, sometimes separating them from their families, frequently depriving them of meaningful education and opportunities for play.	

Term	Explanation	Examples
Sexual abuse	Sexual abuse is the involvement of a person in sexual activities which they do not want or truly understand, or to which they are unable to give valid or effective consent. This may involve rape, sexual assault, inappropriate sexual contact or exposure to inappropriate material.	
Child sexual abuse	A form of sexual abuse that involves any kind of sexual activity with a child (person under the age of 18).	Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.
Sexual harassment	A range of unacceptable and unwelcome behaviours and practices of a sexual nature that may include sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures that are or might reasonably be perceived as offensive or humiliating. This can happen in person or digitally via texts, emails and on social media.	Unwanted sexual advances, requesting sexual favours, telling sexually offensive jokes, making sexual remarks about someone's clothing or appearance.



Term	Explanation	Examples
Sexual assault	A form of sexual abuse, it means any non-consensual sexual act that involves physical contact. This includes when the victim-survivor lacks the capacity to consent.	Groping, forced kissing, forced hugging and touching.
Rape	Sexual assault involving penetration of the vagina, anus or mouth.	
Sexual exploitation	Actual or attempted abuse of a person's vulnerability, differential power or trust for sexual purposes including profiting monetarily, socially or politically from exploitation.	Including child sexual exploitation, soliciting sex workers or exchange of money, employment, humanitarian relief items, goods or services for sex.
Exploitation	Deliberate maltreatment, manipulation or abuse of power and control over another person. It is taking advantage of another person or a situation.	Human trafficking, radicalization, economic exploitation like child labour, forced labour, slavery.
Harmful traditional practices (HTP)	Forms of violence based on long established patterns of action and behaviours which are accepted as part of the cultural practice in specific countries and contexts. Though primarily committed against women and girls, HTP occur across all sexes and genders, and are not unique to a particular culture or religion.	Female genital mutilation, child marriage, forced marriage, 'honour' based violence, scarification, female infanticide, dowry price