



Safeguarding Framework

September 1, 2024

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THE FREEDOM HOUSE SAFEGUARDING FRAMEWORK

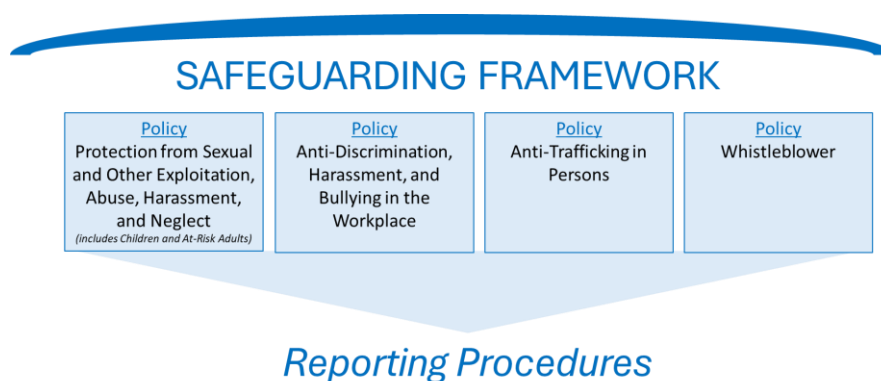
Safeguarding is the protection from sexual and other exploitation, abuse, harassment, neglect, bullying, discrimination, human trafficking, or other harm of our staff, the people we serve, and others in the communities where we work. To ensure we operate with integrity and respect for human rights, uphold the “do no harm” ethical principle, and our duty to safeguard people in our work, Freedom House has developed a Safeguarding Framework which includes a comprehensive set of policies, procedures, and practices to guide us.

Freedom House has established clear mechanisms for [reporting safeguarding concerns](#) contained in this Framework. All staff will receive training on, and independent consultants, contractors, and partners will be informed of, safeguarding policies and how to identify and report safeguarding concerns. All allegations are taken seriously and investigated promptly and impartially. Staff, contractors, independent consultants, partners, or any other person provided access or contact with program participants or beneficiaries are held accountable for any safeguarding breaches and appropriate corrective actions taken. Violations of policies in this Framework may be subject to disciplinary action, up to and including termination.

All staff who are subjected to, experience, witness, suspect, hear rumors about, have direct or indirect knowledge of, or receive an official or unofficial report about behavior that violates policies contained in this Framework, are **required** to immediately report the behavior. Staff may choose the reporting process most comfortable and accessible to them, as outlined in the [Reporting Processes Section](#) of this Framework. Failure to report may result in disciplinary action up to and including termination of employment from Freedom House.

Any victim/survivor, or another person requested by the victim/survivor, may make the report directly themselves using the same processes outlined in the [Reporting Processes Section](#) of this Framework.

Safeguarding Policies



The policies included in the Framework are:

- Protection from Sexual and Other Exploitation, Abuse, Harassment, and Neglect Policy (includes Children and At-Risk Adults)
- Anti-Discrimination, Harassment, and Bullying in the Workplace Policy
- Anti-Trafficking in Persons Policy
- Whistleblower Policy

Scope

The policies in the Safeguarding Framework are applicable to staff, contractors, independent consultants, partners, or any other person provided access or contact with program participants or beneficiaries and apply to conduct occurring as a result of an individual's affiliation/interactions with Freedom House. These policies are applicable in all work-related settings, including physical and virtual settings both on and off of Freedom House's electronic systems, as well as outside events and meetings where Freedom House staff, program participants or beneficiaries are present.

Key Principles

The following principles guide Freedom House's commitment to safeguarding the individuals they employ and serve from all forms of exploitation, abuse, harassment, and other harm:

Prevention: Reducing and managing risk in locations where Freedom House operates and applying a safeguarding perspective when screening and vetting personnel for employment

Reporting: Having clear and safe protocols for reporting safeguarding concerns that are communicated to all parties

Response: Impartially investigating allegations of misconduct in a timely manner, providing support to survivors/victims, holding all staff, contractors, independent consultants, and partners accountable for any safeguarding breaches, and taking corrective action

Accountability and Transparency: Fostering an environment that upholds individuals' right to safety, values their input, and ensures that safeguarding concerns are promptly reported and appropriately addressed

Speak Up Culture: Creating a culture in which individuals feel comfortable and empowered to express their opinions, concerns, and feedback without fear of retaliation or negative consequences

Learning: Ensuring continuous improvement of safeguarding policies by integrating lessons learned

Zero Tolerance

Zero tolerance means that Freedom House is committed to acting on every allegation in a fair, reasonable, and impartial way with due regard for procedural fairness. Appropriate and proportionate actions will be taken for violations of policies.

Application

- The policies contained in Freedom House's Safeguarding Framework prioritize the protection of staff and anyone with whom Freedom House and our staff engage and apply to conduct occurring as a result of an individual's affiliation/interactions with Freedom House.
- All staff receive safeguarding training and sign the Safeguarding Policy Form upon hire, indicating their commitment to comply with policies.
- Supervisors within Freedom House are responsible for promoting and upholding the policies included in the Safeguarding Framework and ensuring their implementation. This includes providing a thorough orientation to new hires and requiring staff to attend regular refresher training to ensure they understand expectations around behavior, risk management, and reporting and responding to safeguarding allegations.
- All staff have a professional and legal obligation to report suspected or actual violations of

safeguarding policies.

- The policies and procedures contained in this Safeguarding Framework comply with applicable national and US legislation, the UN Convention on the Rights of the Child 1989 and other related UN conventions and regulations, Keeping Children Safe, the Inter-Agency Standing Committee (IASC) Minimum Operating Standards for PSEA and the Core Humanitarian Standards Alliance (CHS). If there is a discrepancy between national laws or international standards, the higher standard will prevail. The U.S. Government requires that grantees establish and implement safeguarding policies and procedures, consistent with US law.

Revisions

The policies contained in this Safeguarding Framework will be reviewed every two years to ensure compliance with international standards and updated legislation, and will be revised, when necessary, to incorporate lessons learned.

Definitions and Terminology

Allegation

A claim or assertion that someone has done something illegal or violated a policy, which may be made with or without proof, verbally or in writing.

At-Risk Adult

Someone aged 18 or older who identifies themselves as unable to take care of/protect themselves from harm or exploitation; or who due to gender, gender identity, gender expression, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disaster or conflict, is deemed to be at risk.

Beneficiary

Refers to the individual, organization, or entity who receives services or support, directly or indirectly, from Freedom House.

Bullying

Defined as persistent, repeated, and intentional abuse of power within a relationship(s) by an individual or a group who is/are perceived to have power over one or more targeted persons and is characterized by repeated verbal, physical, or social behavior with the intention of causing physical, social, or psychological harm. The behavior may include, but is not limited to, threats, intimidation, public humiliation/name-calling, persistent and unwelcome teasing, intentional work interference/sabotage, or stalking that creates a risk to mental and/or physical health and safety. The behavior may be directed at persons who feel unable to prevent it from occurring.

Child

Any person under the age of 18 in accordance with Article 1 of the UN Convention on the Rights of the Child, 1989. This policy applies to all children regardless of their background, age, class, gender, gender identity, gender expression, ethnicity, religion, ability, or sexual orientation (lesbian, gay, bisexual, transgender, queer, intersex, asexual [LGBTQIA]), and regardless of the age of consent locally.

Child Abuse

Emotional, physical, sexual, or any other ill-treatment carried out against a child by an adult. **“Emotional child abuse or ill-treatment”** means injury to the psychological capacity or emotional stability of the child caused by acts, threats of acts, or coercive tactics. **“Physical child abuse”** means acts or failures to

act resulting in injury (not necessarily visible) or unnecessary or unjustified pain or suffering without causing injury, harm, or risk of harm to a child's health or welfare, or death.

Child Neglect

A failure to provide for a child's basic needs in the absence of the child's parent or guardian when the care of the child is associated with the award activities.

Child Protection

Protecting children from harm, which includes violence, abuse, exploitation, and neglect.

Complainant

The person making the complaint of wrongdoing, including the alleged survivor or a victim, of a safeguarding violation.

Complaint

A specific grievance of anyone who has been negatively affected by an organization's action or inaction or who believes that anyone associated with the organization has failed to meet a stated commitment, violated a law, or otherwise committed wrongdoing.

Contractor

A company, vendor, supplier, or other entity engaged through a contract following a procurement process for the purpose of providing goods or services. "Contractor" includes anyone employed or contracted by, or acting as an agent of, the company, vendor, supplier or entity.

Discrimination

Defined as unfair or abusive treatment based on assumed or self-disclosed lived experience of homelessness, race, color, ethnicity, age, national origin, native language or dialect, immigration or citizenship status, indigeneity, sex (including intersex identity), gender identity, gender expression, sexual orientation (including asexuality), romantic attraction, body type or size, disability (visible or invisible, including mental health and neurodivergence) regardless of formal diagnosis, HIV status, arrest or conviction record or court involvement, parental status (including pregnancy, childbirth, breastfeeding, and medical conditions related to pregnancy, childbirth, or breastfeeding), sexual and other reproductive health decisions (including family planning, history of abortion, miscarriage etc.), credit history, salary history, housing status, residential location, caregiver status, marital status, partnership(s) status, family structure, status as a survivor of domestic violence (including dating or intimate partner violence), status as a survivor of stalking and/or sexual violence, status as a survivor of any other type of violence, religion or spiritual beliefs and practice, genetic information, military status, employment status, educational background, wealth background, political affiliation or practice, drug use history, history of sex work, participation in other underground economies or any other characteristic as protected by law in any aspect of the employment relationship, including recruiting, hiring, promotion or demotion, transfer, layoff or other form of termination, compensation, assignments, and benefits.

NOTE: Some criminal convictions may disqualify a candidate from employment such as sex-related crimes, child abuse, violence, drug, and theft-related convictions.

Do No Harm

The principle of "Do no harm" emphasizes the importance of prioritizing the well-being of others and avoiding actions that may cause harm or negative consequences for them.

Exploitation

Any actual or attempted abuse of a position of vulnerability, differential power, or trust, including for the purposes of profiting monetarily, socially, or politically. When carried out for a sexual purpose this constitutes sexual exploitation.

Harassment

Unwanted, unwelcomed and uninvited behavior that demeans, threatens or offends and results in a hostile environment. Harassment can be targeted at an individual, or a particular group of individuals, with or without protected characteristics.

Independent Consultant

Individuals engaged as third parties through a contract for specific, short-term technical services.

Partner

Refers to national or international agencies or organizations that deliver programs or activities funded or supported by Freedom House, including subgrantees and anyone employed or contracted by, or acting as an agent of, the agency or organization.

Protected Characteristic

Refers to a personal characteristic(s) that is protected from discrimination by law or Freedom House policy, as stated above in "[Discrimination](#)".

Reporting Mechanism or Procedure

Processes that allow individuals to report concerns such as breaches of law, organizational policy, or standards of behavior. Elements of a complaints mechanism may include suggestion boxes, hotlines, whistleblowing policies, and designated focal points. Please see the [Reporting Processes Section](#) of this Framework.

Risk

The possibility of exposure to danger, loss, or harm and/or the probability of an adverse occurrence.

Safeguarding

The responsibility that all organizations have to ensure that their culture, programs, and practices respect the rights and dignity of all people with whom the organization comes in contact—especially children and at-risk adults—to live free from abuse and harm.

Sexual Abuse¹

Any actual or threatened physical intrusion of a sexual nature toward another person whether by force or under unequal or coercive conditions. When carried out against a child by an adult, such conduct is considered sexual abuse even in the absence of force or unequal or coercive conditions.

Sexual Abuse of Children

A child cannot fully comprehend or ever give informed consent to any sexual activity. Sexual abuse may include, but is not limited to, the inducement or coercion of a child to engage in any sexual activity; the exploitative use of a child in prostitution or other unlawful sexual practices; and the exploitative use of pornographic performances and materials.

Sexual Assault

Defined as activity with another person who does not consent. It is a violation of bodily integrity and

¹ United Nations Glossary on Sexual Exploitation and Abuse, 24 July 2017.

sexual autonomy and is broader than narrower conceptions of “rape,” especially because (a) it may be committed by other means than force or violence, and (b) it does not necessarily entail penetration.

Sexual Exploitation²

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. When carried out for a sexual purpose this constitutes sexual exploitation.

Sexual Harassment

Defined as unsolicited and unwelcome sexual advances, requests for sexual acts or favors, or other physical, verbal, or electronic conduct, or visual displays of a sexual nature when submission to such conduct is made either explicitly or implicitly as a term or condition of an individual’s employment (such as hiring, compensation, advancement, promotion, or retention). For example, when submission to or rejection of such conduct by an individual is used as a basis for making employment decisions concerning the individual (e.g., treating staff favorably for engaging in such conduct or unfavorably for refusing to engage in the conduct). Such conduct has the purpose or effect of creating an intimidating, hostile, or offensive working environment.

Staff

Refers to all individuals that are paid or unpaid, working as full-time, part-time, short-term, or temporary employees, interns, fellows, and Board members.

Survivor or Victim

The person who is, or has been, sexually exploited, abused, harassed, or experienced other harm by a Freedom House representative. “Survivor” is generally preferred in psychological and social support sectors because it implies resilience. “Victim” is a term often used in legal and medical sectors. This document uses the term “survivor” except in the case of children where the term “victim” is used.

Trafficking

Crimes of human trafficking, slavery, and slavery-like practices such as servitude, forced labor, forced and/or early marriage, the sale and exploitation of children and at-risk adults, and debt bondage.

Whistleblower

A person who reports concerns or suspicions of policy violations or wrongdoing within an organization that is either illegal, unethical, or poses a threat to the safety or welfare of people or the organization.

Zero-Tolerance

Any reported allegations or suspicions of violations of policies in this Safeguarding Framework will be acted upon in a fair and impartial manner, and appropriate and proportional disciplinary actions will be taken for violations of policies.

² Ibid

PROTECTION FROM SEXUAL AND OTHER EXPLOITATION, ABUSE, HARASSMENT, AND NEGLECT POLICY

Policy Overview

Freedom House commits to safeguarding the rights, dignity, safety, and wellbeing of Freedom House staff, program participants, beneficiaries, and anyone receiving services or support from Freedom House, especially children and at-risk adults accessing Freedom House support and programs. This policy confirms Freedom House’s unwavering commitment to “do no harm” and to maintain the highest standards of ethical and professional conduct. This policy is based on global best practices and international standards in the prevention of sexual and other types of exploitation, abuse, and harassment, including child abuse and child neglect, of anyone receiving services or support from Freedom House. These standards include the Inter-Agency Standing Committee (IASC) Minimum Standards on PSEA; Core Humanitarian Standards PSEAH Index; and the InterAction-led CEO Pledge on Preventing Sexual Abuse, Exploitation and Harassment by and of NGO Staff.³

Furthermore, this policy recognizes the importance of transparency, accountability, and continuous learning in safeguarding efforts. It outlines Freedom House’s responsibilities in preventing and responding to any type of exploitation, harassment, abuse (including child abuse), and child neglect that may occur in the context of implementing Freedom House programs and services including providing support and care for survivors or victims, conducting investigations, and implementing disciplinary actions as necessary. Freedom House’s commitment to accountability also includes promoting awareness, understanding, and training staff on appropriate conduct and [reporting of concerns](#), as well as reviewing and updating policies and procedures to reflect lessons learned and best practices.

Policy Statement

Freedom House condemns and prohibits staff, contractors, independent consultants, partners, or any other person provided access or contact with program participants or beneficiaries, from engaging in, supporting, advancing, intentionally ignoring, or failing to act upon allegations of any of the following actions directed toward other staff, participants, or beneficiaries, and especially children and at-risk adults: sexual or any other type of exploitation, sexual or any other type of harassment, sexual or any other type of abuse (including child abuse), and child neglect. Freedom House will take all necessary measures to prevent and respond to such incidents. This includes handling all reported incidents in a timely, fair, and confidential manner to uphold the rights and dignity of all individuals involved.

Freedom House staff, contractors, independent consultants, partners, or any other person provided access or contact with program participants or beneficiaries are required to adhere to Freedom House’s behavior standards that are consistent with the IASC’s Task Force’s Six Core Principles relating to sexual

³ <https://psea.interagencystandingcommittee.org/>; <https://www.chsalliance.org/protection-from-sexual-exploitation-abuse-and-sexual-harassment/>; <https://www.interaction.org/issues/prevention-of-sexual-abuse-harassment/>

exploitation and abuse. The Freedom House standards are⁴:

1. Sexual exploitation and abuse constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally or legality in the jurisdiction. Mistaken belief regarding the age of a child is not a defense.
3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes the exchange of assistance that is due to beneficiaries or program participants.
4. Any sexual relationship between staff, contractors, independent consultants, and partners, and beneficiaries or program participants, is prohibited. Such relationships undermine the credibility and integrity of our work to expand and defend freedom.
5. Where staff, contractors, independent consultants, partners, or any other person provided access or contact with program participants or beneficiaries develop concerns or suspicions regarding sexual abuse or exploitation by fellow staff, contractors, independent consultants, or partners, whether in the same agency or not, they must report such concerns via established Freedom House reporting processes. Failure to report may result in disciplinary action up to and including termination of employment/engagement with Freedom House.
6. Staff are obliged to create and maintain an environment that prevents any type of exploitation, harassment, abuse (including child abuse), and child neglect. In addition, supervisors at all levels have additional requirements to support and develop systems that maintain this environment.

Sexual Harassment/Exploitation includes, but is not limited to, the exchange of money, employment, or services and materials in exchange for sex, unwelcome sexual advances, requests for sexual favors and other verbal, nonverbal or physical conduct or communication of a sexual nature. Sexual harassment/exploitation occurs when:

- 1) The submission to such sexual conduct or communication is either implicitly or explicitly made a term or condition of an individual's employment or access to services or support provided by Freedom House.
- 2) The submission to or rejection of that sexual conduct or communication is used as a basis for employment decisions affecting the individual's employment or education or used as a basis for decisions affecting the individual's access to Freedom House services or support.
- 3) The sexual conduct or communication has the purpose or effect of substantially interfering with an individual's employment or access to Freedom House services or support.
- 4) The sexual conduct involves anyone under the age of 18, the age of majority established by the 1989 UN Convention on the Rights of the Child (regardless of the age of consent locally).
- 5) The sexual conduct or communication creates an intimidating, hostile, or offensive working environment in the case of staff.
- 6) The sexual conduct by Freedom House staff, contractors, independent consultants, partners, or any other person provided access or contact with program participants or beneficiaries is with a commercial sex worker.

Sexual Abuse is a gross violation of fundamental human rights. Sexual abuse in this policy covers all forms of sexual threat, assault, violence, rape, molestation without physical harm or penetration, and

⁴ IASC Six Core Principles, 2019. <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>

child exploitation and abuse, which includes any sexual contact or relations with anyone under the age of 18. Any Freedom House staff, contractor, independent consultant, or partner who engages in any form of sexual abuse as defined in this policy will be terminated and reported to proper authorities, as applicable.

Freedom House Child and At-Risk Adult Protection Standards

Freedom House will protect children and at-risk adults through the following means:

- **Awareness:** Ensure all staff, contractors, independent consultants, and partners are made aware of 1) the nature, indicators, and effects of the various forms of child abuse and neglect and 2) potential threats to children's and youth safety, development, and wellbeing, and potential harm to at-risk adults.
- **Prevention:** Confirm that staff, contractors, independent consultants, and partners and others make every effort to minimize risks to children and at-risk adults through raising awareness and adhering to good practices that promote protective environments, including proper vetting before bringing on any staff, consultant, or partner as defined in this Framework. Pre-engagement vetting includes comprehensive criminal and sexual offender background checks.
- **Reporting:** Educate staff on mandatory reporting of sexual exploitation and abuse of a child or at-risk adult along with the required steps and procedures to take when concerns arise; educate Freedom House program participants and beneficiaries on available mechanisms for reporting exploitation and abuse by Freedom House staff, contractors, independent consultants, partners or others.
- **Responding:** Guarantee that safe and ethical action is taken to care for and support children and at-risk adults and respond with the best interest of the child whenever concerns arise regarding possible sexual exploitation and abuse of a child.

Further, because staff, contractors, independent consultants, and partners, or any other person provided access or contact with program participants or beneficiaries may come into contact with children in the implementation of programming, which raises the risk of child abuse, exploitation, or neglect within programming, Freedom House abides by the following child safeguarding core principles:

- 1) Freedom House ensures compliance with host country and local child welfare and protection legislation or international standards, whichever gives greater protection, and with U.S. law where applicable;
- (2) Freedom House prohibits all Freedom House staff, contractors, independent consultants, partners, or any other person provided access or contact with program participants or beneficiaries and partners from engaging in child abuse, exploitation, or neglect;
- (3) Freedom House considers child safeguarding in project planning and implementation to determine potential risks to children that are associated with project activities and operations;
- (4) Freedom House applies measures to reduce the risk of child abuse, exploitation, or neglect, including, but not limited to, limiting unsupervised interactions with children; prohibiting exposure to pornography; and complying with applicable laws, regulations, or customs regarding the photographing, filming, or other image-generating activities of children;
- (5) Freedom House promotes child-safe screening procedures for staff, particularly staff whose work brings them in direct contact with children; and
- (6) Freedom House has a procedure for:
 - a. ensuring that Freedom House staff, contractors, independent consultants, partners, or any other person provided access or contact with program participants or beneficiaries and others recognize child abuse, exploitation, or neglect;

- b. mandating that Freedom House staff, contractors, independent consultants, partners, or any other person provided access or contact with program participants or beneficiaries, and others [report allegations](#);
- c. investigating and managing allegations; and
- d. taking appropriate action in response to such allegations, including, but not limited to, dismissal of staff and ceasing engagement with contractors, independent consultants, and partners.

Behavior Standards

Freedom House staff, contractors, independent consultants, partners, or any other person provided access or contact with program participants or beneficiaries **MUST**:

- ✓ Ensure all relevant Freedom House activities and services are accessible for all children and at-risk adults, including children and at-risk adults with special needs and abilities
- ✓ Identify, map out, and analyze risks for children and at-risk adults and develop risk mitigation plans
- ✓ Encourage children and at-risk adults to raise questions or concerns about their own safety and the safety of others
- ✓ Establish and maintain explicit personal boundaries and guidelines while engaging in activities that involve children or at-risk adults
- ✓ Meaningfully engage primary caregivers in child safeguarding interventions
- ✓ Keep personal data and identifying details of children and at-risk adults in a secure location, maintaining the highest level of privacy, so as not to increase risk of harm for children and at-risk adults accessing Freedom House services or support
- ✓ Be aware of child and at-risk adult sexual exploitation and abuse referral and reporting mechanisms
- ✓ Immediately report any suspicion of violations of this policy to the immediate supervisor (or next line manager if the supervisor is suspected of committing abuse), or Talent & Culture

Freedom House staff, contractors, independent consultants, partners, or any other person provided access or contact with program participants or beneficiaries **MUST NEVER**:

- ✓ Be alone with any child (or small group of children) away from others and guardians
- ✓ Hit, slap, or otherwise physically assault or abuse children
- ✓ Develop physical or sexual relationships with children or at-risk adults
- ✓ Have relationships with children and at-risk adults that are, or could be, deemed exploitative or abusive, including offering or providing money, materials, services, or work in exchange for sexual favors
- ✓ Use language, make suggestions, or offer advice that is inappropriate, offensive, or abusive
- ✓ Act in ways intended to shame, humiliate, belittle or degrade children or at-risk adults or otherwise perpetrate any form of emotional abuse
- ✓ Behave physically in a manner which is inappropriate or sexually provocative
- ✓ Act in ways that may place a child in danger or increase a child's risk of abuse
- ✓ Take children to one's home, especially where they will be alone with someone, or have children stay overnight at one's home unsupervised
- ✓ Discriminate against, show differential treatment towards, or favor particular children or at-risk adults at the exclusion of others

Upon employment with Freedom House, each staff member will commit, in writing, to upholding the standards outlined in this policy and will sign in acknowledgement of receipt and understanding of this

policy underscoring procedures and consequences in the event of any violations. Independent consultants, contractors, and partners will be informed of this policy. Subrecipients are required to certify compliance with safeguarding policies and laws, as mandated by donors, when they sign Subawards with Freedom House. Safeguarding-related ethics and compliance clauses, as well as reporting mechanisms for violations, are included in all third-party agreements.

Roles and Responsibilities

This policy applies to all Freedom House staff, contractors, independent consultants, partners, or any other person provided access or contact with program participants or beneficiaries. Compliance is mandatory for all covered by this policy, both inside and outside of working hours. Violations, including failure to promptly report any concerns, may be cause for disciplinary action, up to and including termination of employment or removal from engagement with Freedom House.

All Freedom House staff have a shared responsibility for:

- Ensuring the safety and wellbeing of other staff, beneficiaries, and program participants, especially children and at-risk adults. This responsibility includes a requirement to take appropriate action to prevent potential risks and to [report](#) any suspicions, rumors, concerns, experience, witness, direct or indirect knowledge, or receipt of an official or unofficial report related to behavior that violates policies contained in this Framework, especially related to safeguarding children and at-risk adults. Failure to report may result in disciplinary action, including up to possible termination.
- Promoting a work environment that is free of sexual misconduct, which includes supporting and maintaining systems that promote a safe environment. This means creating a supportive culture where everyone feels safe and protected from harm, where there is zero tolerance for sexual misconduct, and an open “speak up” culture is encouraged at all times.

Procedures

Communication and Training

Freedom House takes the following measures to ensure that it properly communicates its commitment to prevent and respond to sexual exploitation, abuse, and harassment:

- All staff receive a comprehensive induction training session upon joining Freedom House and will be provided with annual refresher training.
- Staff sign a document acknowledging their understanding and commitment to upholding the policy.
- The Policy is publicly displayed in all Freedom House office and project locations and translated into the relevant local language.
- The Policy is posted on Freedom House’s website, including instructions on how to report concerns. References to the Policy are also included in all job advertisements.

Program Safeguarding Review

To ensure the incorporation of this policy in Freedom House programs, staff, consultants, independent consultants, and partners are expected to implement the guidelines below, which will be reviewed for compliance and effectiveness:

- Minimize risk of abuse, exploitation and harm to children and at-risk adults by planning and organizing workplaces according to the standards stated herein, including displaying the Policy and Reporting Procedures in all Freedom House offices and project locations, translated into the relevant local language
- Conduct appropriate reference and background checking as part of the recruitment and selection process
- Foster a “speak up” culture where concerns can be raised and discussed
- Use this policy to inform program participants and beneficiaries of the standards of professional practice they can expect from staff, consultants, independent consultants, and partners, and what to do if these standards are not met

Reporting Concerns and Incidents

If a child or at-risk adult is disclosing or making a report of abuse allegedly committed by someone associated with Freedom House directly to you, do the following:

- Take the report seriously and be sensitive and compassionate
- Offer for the child or at-risk adult to speak with a qualified child protection specialist or social worker of the same sex if they wish, either to make the report or for follow up care and assistance
- You should not investigate -- ask only a few necessary and relevant questions
- Document what the child or at-risk adult tells you *after* your meeting, recording only essential information
- Report the matter **on the same day the knowledge or suspicions of misconduct are obtained** via the processes outlined in the [Reporting Processes Section](#) of this Framework. Staff may choose the reporting process most comfortable and accessible to them.
- **If a child or at-risk adult is in immediate danger, keep them with you and contact your immediate supervisor or another trusted member of the management team for instructions.**

Decisions regarding appropriate actions to take in response to **child or at-risk adult** safeguarding concerns should always be governed by the principle of “best interests of the child/at-risk adult” and the desire to secure the best possible outcomes for the child/adult.

Failure to report knowledge, rumors or suspicions of misconduct violating this policy may result in disciplinary action up to and including termination of employment from Freedom House.

Staff, including supervisors, should not attempt to conduct their own investigations into reports of misconduct.

Partner Compliance

Contracts and agreements between Freedom House and its partners, which includes sub-grantees will contain a provision mandating their adherence to a strict zero-tolerance policy regarding sexual exploitation and abuse (SEA). Partners must also implement preventive measures against SEA, conduct investigations into any reported incidents, and take corrective action if SEA has occurred. Non-compliance with these obligations may result in termination of the partnership agreement or contract.

Compliance Plan

- Freedom House has developed a Compliance Plan to prevent and address sexual and other types of exploitation, abuse, and harassment, including child abuse and child neglect. The Compliance Plan sets out the standard processes and procedures for monitoring and enforcing this policy and complying with all applicable laws and regulations (see attached as **Appendix 1**);
- A Compliance Plan is required under all United States government funded grants, cooperative agreements, contracts and subawards (“federal award”) with an estimated value of the services required to be performed outside the United States that exceeds \$500,000;
- The Compliance Plan will be adapted and modified for each applicable project to ensure appropriateness based on the size and complexity of the federal award and the nature and scope of the activities to be performed for the government. The catered plan will be provided to the federal agency Agreement/Grant Officer upon request;
- The Compliance Plan will be posted on Freedom House’s webpage and at relevant worksites.

ANTI-DISCRIMINATION, HARASSMENT, AND BULLYING IN THE WORKPLACE POLICY

Policy Overview

This policy outlines Freedom House's commitment to promoting a safe, respectful, and inclusive work environment for all staff. The purpose of the policy is to ensure staff are aware of behavior that constitutes discrimination, harassment, and bullying, as well as actions that may result from violations of this policy.

Policy Statement

Freedom House prohibits discrimination, harassment, and bullying in any form in Freedom House offices, workplaces, work-related activities, and on Freedom House's devices and platforms. Any conduct that violates this policy will not be tolerated and appropriate disciplinary action will be taken for violations.

Discrimination is unfair or abusive treatment based on assumed or self-disclosed lived experience of homelessness, race, color, ethnicity, age, national origin, native language or dialect, immigration or citizenship status, indigeneity, sex (including intersex identity), gender identity, gender expression, sexual orientation (including asexuality), romantic attraction, body type or size, disability (visible or invisible, including mental health and neurodivergence) regardless of formal diagnosis, HIV status, arrest or conviction record or court involvement, parental status (including pregnancy, childbirth, breastfeeding, and medical conditions related to pregnancy, childbirth, or breastfeeding), sexual and other reproductive health decisions (including family planning, history of abortion, miscarriage etc.), credit history, salary history, housing status, residential location, caregiver status, marital status, partnership(s) status, family structure, status as a survivor of domestic violence (including dating or intimate partner violence), status as a survivor of stalking and/or sexual violence, status as a survivor of any other type of violence, religion or spiritual beliefs and practice, genetic information, military status, employment status, educational background, wealth background, political affiliation or practice, drug use history, history of sex work, participation in other underground economies or any other characteristic as protected by law in any aspect of the employment relationship, including recruiting, hiring, promotion or demotion, transfer, layoff or other form of termination, compensation, assignments, and benefits. With regard to the Americans with Disabilities Act and other related laws, Freedom House will endeavor to make reasonable accommodations for the following reasons: known physical or mental disabilities; the sincere religious beliefs of its employees; and pregnancy, childbirth, or related medical conditions. Examples include:

- Refusing to hire or promote someone based on their race, gender, disability, age, or any other legally or Freedom House policy protected characteristics
- Making derogatory comments or jokes about someone's race, gender, disability, age, religion, or any other legally or Freedom House policy protected characteristics
- Paying someone less than their colleagues for the same work because of their gender, disability, age or other legally or Freedom House policy protected characteristics
- Assigning someone less favorable tasks or duties because of their disability or legally or Freedom House policy protected characteristics
- Excluding someone from Freedom House events or activities based on their gender, disability or age or other legally or Freedom House policy protected characteristics

Harassment is unwanted, unwelcomed and uninvited behavior that demeans, threatens or offends and results in a hostile environment. Harassment can be targeted at an individual, or a particular group of individuals, with or without protected characteristics. Examples of harassment include:

- Offensive jokes, slurs, epithets or name-calling
- Physical assaults or threats, intimidation, ridicule or mockery
- Insults or name-calling
- Offensive objects or pictures
- Interference with work performance

Bullying is defined as persistent, repeated, and intentional abuse of power within a relationship(s) by an individual or a group who is/are perceived to have power over one or more targeted persons and is characterized by repeated verbal, physical, or social behavior with the intention of causing physical, social, or psychological harm. The behavior may include, but is not limited to, threats, intimidation, public humiliation/name-calling, persistent and unwelcome teasing, intentional work interference/sabotage, or stalking that creates a risk to mental and/or physical health and safety. The behavior may be directed at persons who feel unable to prevent it from occurring. Examples of bullying include:

- Using insults, name-calling, or teasing to humiliate, intimidate, or belittle someone
- Excluding or isolating an individual or group
- Spreading rumors, gossiping, or excluding someone from a group to harm their reputation, relationships, or sense of belonging
- Using electronic communication devices and platforms such as social media, text messages, or emails to harass, threaten, or humiliate someone.
- Deliberately changing work schedules to inconvenience particular employees

Bullying should not be confused with isolated incidents of social rejection or dislike, single acts of meanness or spite, or mutual disagreements. While these actions can be distressing, they do not meet the criteria for bullying.

Roles and Responsibilities

All staff, contractors, independent consultants, partners, or any other person provided access or contact with program participants or beneficiaries, are prohibited from engaging in behavior that constitutes discrimination, harassment, and bullying. Staff must promote a culture of respect and inclusion by treating their colleagues with dignity and respect and reporting incidents that violate this policy.

Procedures

Reporting Concerns and Incidents

Staff may choose the reporting process most comfortable and accessible to them, as outlined in the [Reporting Processes section](#) of this Framework. Failure to report may result in disciplinary action up to and including termination of employment from Freedom House.

Staff, including supervisors, should not attempt to conduct their own investigations into reports of misconduct.

ANTI-TRAFFICKING IN PERSONS POLICY

Policy Overview

Freedom House has instituted an Anti-Trafficking in Persons Policy that outlines its commitment to prevent and combat human trafficking in its operations and assistance in compliance with U.S. government regulations including 2 CFR 200 Part 175 Award Term for Trafficking in Persons and paragraph (g) of section 106 of the Trafficking Victims Protection Act of 2000 (TVPA), as amended ([22 U.S.C. 7104\(g\)](#)). The purpose of the policy is to ensure staff, contractors, independent consultants, partners, or any other person provided access or contact with program participants or beneficiaries are aware of prohibited conduct under anti-trafficking regulations and laws, as well as actions that may result from violations. This policy outlines Freedom House's procedures for preventing trafficking in persons through awareness, reporting, recruitment and wage plans, housing plans and subrecipient/subcontractor compliance.

Policy Statement

Trafficking in persons ("TIP") is a form of exploitation. It involves recruitment, transportation, and/or receipt of individuals through deceit, coercion, threat, or force for the purpose of exploitation. It often involves exploitive conduct such as forced prostitution and child pornography, forced marriages, illicit donor trade, narcotics, smuggling, and forced begging or labor.

Freedom House condemns and prohibits contractors at any tier, independent consultants, partners, subrecipients and their employees, labor recruiters, brokers, or other agents, from engaging in, supporting, advancing, intentionally ignoring, or failing to act upon allegation of any form of trafficking in persons. Freedom House will take all necessary measures to prevent and respond to such incidents.

Freedom House complies with the U.S. Government's zero-tolerance policy on trafficking in persons by organizations receiving US funds.⁵ Freedom House prohibits trafficking in persons, the procurement of commercial sex acts, or the use of forced labor, consistent with the TVPA requirements. All staff are educated on the policy and sign a statement acknowledging their understanding, agreement, and commitment to abide by the Anti-Trafficking in Persons Policy.

Definitions

Agent: Any individual, including a director, an officer, an employee, or an independent contractor, authorized to act on behalf of Freedom House.

Coercion:

- (1) Threats of serious harm to or physical restraint against any person;
- (2) Any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or
- (3) The abuse or threatened abuse of the legal process.

Commercial Sex Act: Any sex act for which anything of value is given to or received by any person.

Forced Labor: Knowingly providing or obtaining the labor or services of a person:

- (1) By threats of serious harm to, or physical restraint against, that person or another person;

⁵ Federal Acquisition Regulation (FAR) 52.22-50 and 22.1703(c), Executive Order 13627 (Strengthening Protections Against Trafficking in Persons in Federal Contracts) and Title 2 CFR PART 175 Award Term for Trafficking in Persons.

(2) By means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; or

(3) By means of the abuse or threatened abuse of law or the legal process.

Involuntary Servitude: Includes a condition of servitude induced by means of:

(1) Any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint; or

(2) The abuse or threatened abuse of the legal process.

Recruitment Fees: Fees of any type, including charges, costs, assessments, or other financial obligations, that are associated with the recruiting process, regardless of the time, manner, or location of imposition or collection of the fee.

(1) Recruitment fees include, but are not limited to, the following fees (when they are associated with the recruiting process) for-

(i) Soliciting, identifying, considering, interviewing, referring, retaining, transferring, selecting, training, providing orientation to, skills testing, recommending, or placing employees or potential employees;

(ii) Advertising

(iii) Obtaining permanent or temporary labor certification, including any associated fees;

(iv) Processing applications and petitions;

(v) Acquiring visas, including any associated fees;

(vi) Acquiring photographs and identity or immigration documents, such as passports, including any associated fees;

(vii) Accessing the job opportunity, including required medical examinations and immunizations; background, reference, and security clearance checks and examinations; and additional certifications;

(viii) An employer's recruiters, agents or attorneys, or other notary or legal fees;

(ix) Language interpretation or translation, arranging for or accompanying on travel, or providing other advice to employees or potential employees;

(x) Government-mandated fees, such as border crossing fees, levies, or worker welfare funds;

(xi) Transportation and subsistence costs-

(a) While in transit, including, but not limited to, airfare or costs of other modes of transportation, terminal fees, and travel taxes associated with travel from the country of origin to the country of performance and the return journey upon the end of employment; and

(b) From the airport or disembarkation point to the worksite;

(xii) Security deposits, bonds, and insurance; and

(xiii) Equipment charges.

(2) A recruitment fee, as described in the introductory text of this definition, is a recruitment fee, regardless of whether the payment is-

(i) Paid in property or money;

(ii) Deducted from wages;

(iii) Paid back in wage or benefit concessions;

(iv) Paid back as a kickback, bribe, in-kind payment, free labor, tip, or tribute; or

(v) Collected by an employer or a third party, whether licensed or unlicensed, including, but not limited to-

- (a) Agents;
- (b) Labor brokers;
- (c) Recruiters;
- (d) Staffing firms (including private employment and placement firms)
- (e) Subsidiaries/affiliates of the employer;
- (f) Any agent or employee of such entities; and
- (g) Subcontractors at all tiers.

Severe Forms of Trafficking in Persons:

- (1) Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
- (2) The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

"Sex Trafficking": The recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act.

Roles and Responsibilities

All staff, contractors at any tier, independent consultants, partners, subrecipients and their employees, labor recruiters, brokers, or other agents, are strictly prohibited from:

- 1) Engaging in any form of trafficking in persons;
- 2) Procuring commercial sex acts;
- 3) Using trafficked labor, or forced labor, at any time for any reason;
- 4) Acts that directly support or advance trafficking in persons, including the following:
 - Destroying, concealing, confiscating, or otherwise denying an employee access to his or her identity or immigration documents;
 - Charging recruitment fees to employees;
 - Failing to provide return transportation or pay for return transportation costs upon the end of employment, for certain employees who are not nationals of the country in which the work is taking place and who were brought into the country if requested by the employee, unless:
 - Exempted from this requirement by USAID or any other federal Government agencies under the award or contract, or
 - The employee is a victim of human trafficking seeking victim services or legal redress in the country of employment or a witness in a human trafficking enforcement action;
 - Providing or arranging for housing that fails to meet the host country housing and safety standards.

Procedures

Reporting of Trafficking in Persons Concerns

Staff may choose the reporting process most comfortable and accessible to them, as outlined in the [Reporting Processes section](#) of this Framework. Failure to report may result in disciplinary action up to and including termination of employment from Freedom House. Supplemental reports of concerns may be made directly to the Global Human Trafficking Hotline at 1-844-888-FREE or its email address at

help@befree.org. Staff who fail to report may face disciplinary action including termination of employment from Freedom House.

Compliance Plan and Annual Certification

- Freedom House has developed an Anti-Trafficking in Persons Compliance Plan which sets out the standard processes and procedures for monitoring and enforcing this TIP policy and complying with all applicable laws and regulations (see attached as **Appendix 1**);
- A Compliance Plan is required under all United States government funded grants, cooperative agreements, contracts and subawards (“federal award”) with an estimated value of the services required to be performed outside the United States that exceeds \$500,000;
- The Compliance Plan will be adapted and modified for each applicable project to ensure appropriateness based on the size and complexity of the federal award and the nature and scope of the activities to be performed for the government. The catered plan will be provided to the federal agency Agreement/Grant Officer upon request;
- The Compliance Plan will be posted on Freedom House’s webpage and at relevant worksites;
- Freedom House will submit annual certifications to the agency Agreement/Grant Officer during performance of the federal Award when a compliance plan was required upon request (see **Appendix 2**);
- Freedom House will require Subrecipients/Subcontractors who receive federal funds of \$500,000 or more to provide a copy of their Compliance Plan prepared in accordance with Anti-Trafficking regulations;
- Freedom House will require annual certifications from Subrecipients/Subcontractors during performance of the subgrant or subcontract, when a compliance plan is required (see **Appendix 2**).

WHISTLEBLOWER POLICY

Policy Overview

The Whistleblower Policy is a set of guidelines and procedures designed to protect individuals who report suspected illegal, unethical, dishonest, improper or unsafe practices in relation to the work of Freedom House. Freedom House requires staff to report suspected wrongful conduct and protects those who make such reports from retaliation. Freedom House promotes all efforts to prevent, address, and correct any wrongful conduct.

Policy Statement

The Whistleblower Policy requires employees to report suspected wrongful conduct. As used in this policy, “wrongful conduct” refers to violations of Freedom House’s policies, applicable laws, financial misconduct (such as fraud, embezzlement, false reporting, inappropriate or unlawful use of Freedom House’s money or property), unethical conduct, and conflicts of interest.

As a recipient of federal grants and cooperative agreements, Freedom House informs all employees of the employee whistleblower rights and protections of the “Enhancement of Contractor Employee Whistleblower Protections” provided under [41 U.S.C. § 4712](#). In compliance with this section, Freedom House will not discharge, discipline, demote, or otherwise discriminate against an employee as a reprisal for good-faith whistleblowing. In addition, employee whistleblower protections cannot be waived by any agreement, policy, form or condition of employment.

Roles and Responsibilities

Freedom House staff, contractors, independent consultants, partners, or any other person provided access or contact with program participants or beneficiaries must demonstrate high ethical standards in their work, actions, and behaviors. They must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. Staff are obligated to report suspected instances of wrongful conduct.

Procedures

Reporting of Illegal, Unethical, Dishonest, Improper or Unsafe Practices

Staff may choose the reporting process most comfortable and accessible to them, as outlined in the [Reporting Processes section](#) of this Framework. Where no other reporting option is perceived by the staff member to be viable, the report may be made to the Chair of the Board of Directors, or the Board Audit Committee. Failure to report may result in disciplinary action up to and including termination of employment from Freedom House.

Staff, including supervisors, should not attempt to conduct their own investigations into reports of misconduct.

REPORTING PROCESSES

Reporting Process Overview

All Freedom House staff who are subjected to, experience, witness, suspect, hear rumors about, have direct or indirect knowledge of, or receive an official or unofficial report about behavior that violates policies contained in this Framework, are **required** to immediately report the behavior. Staff may choose the reporting process most comfortable and accessible to them, as outlined below. Failure to report may result in disciplinary action up to and including termination of employment from Freedom House.

Any victim/survivor, or another person requested by the victim/survivor, may make the report directly themselves using the same processes outlined below. Under no circumstances are victims/survivors required to report the incident or concern to a person involved in the misconduct or to a supervisor, whether or not the supervisor is alleged to be responsible for the misconduct.

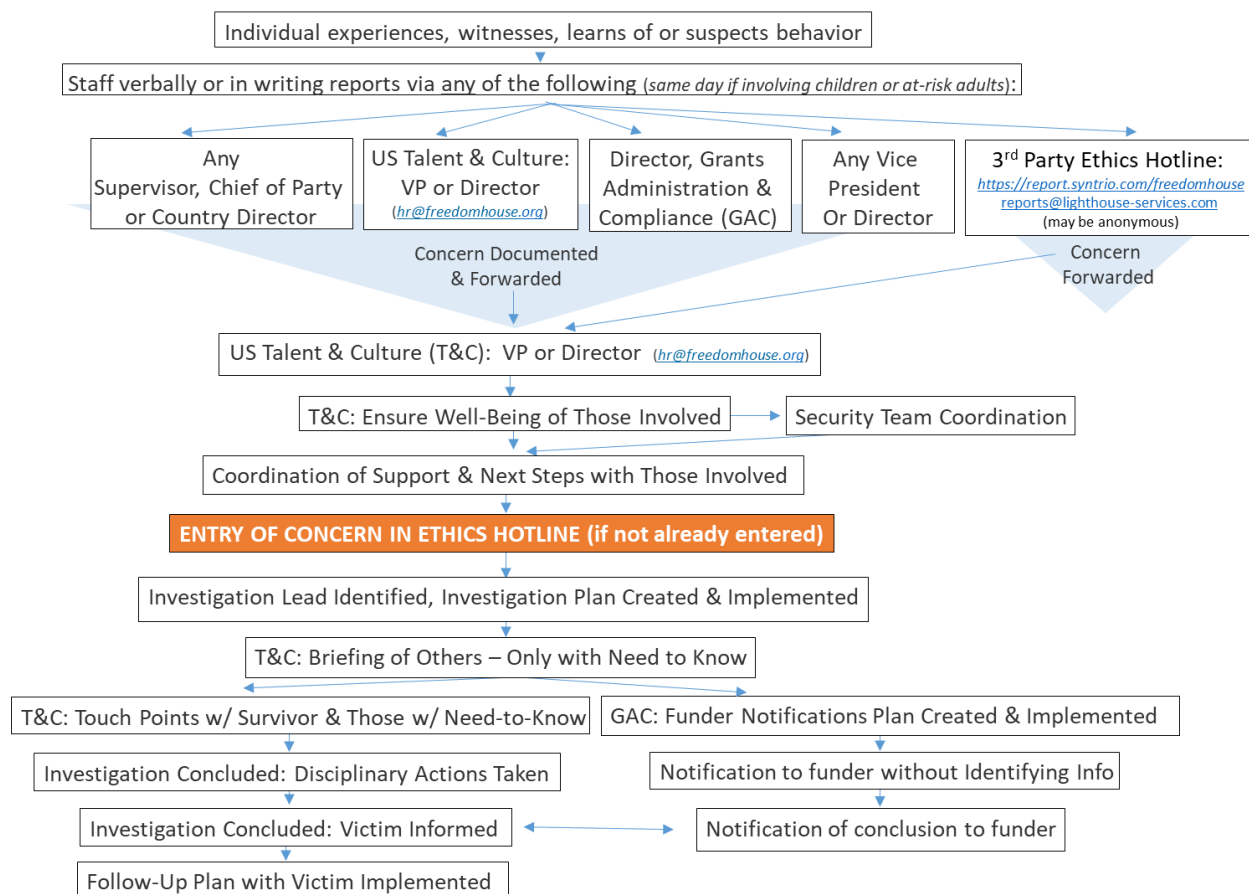
Reports may be made verbally or in writing, in person, by phone, or in text or email, or may be submitted anonymously or otherwise via the Ethics Hotline <https://report.syntrio.com/freedomhouse> (see [Anonymous Reporting](#) below). There is no distinction between a “formal”, “informal”, or “off-the-record” concern/complaint – all should be reported.

Subrecipients are required to certify compliance with safeguarding policies and laws, as mandated by donors, when they sign Subawards with Freedom House. Safeguarding-related ethics and compliance clauses, as well as reporting mechanisms for violations, are included in all third-party agreements.

Staff, including supervisors, should not attempt to conduct their own investigations into reports of misconduct and violations of policies. Because circumstances of every report are different, Freedom House retains discretion and flexibility in conducting an appropriate investigation and responding to a report. If the investigation determines wrongful conduct has occurred, timely and appropriate action will be taken, up to and including termination.

Freedom House will protect personally identifiable information (PII) from unauthorized access and disclosure by retaining all case information and documentation in the secure online Ethics Hotline system.

Reporting Process



1. Individual experiences, witnesses, learns of, or suspects behavior
2. Staff are immediately **required** to verbally or in writing report via any of the following reporting lines. **Concerns involving children or at-risk adults must be reported on the same day the knowledge or suspicions of misconduct are obtained:**
 - a. A Supervisor, COP, or Country Director
 - b. US Talent & Culture – Vice President or Director
 - c. Director, Grants Administration & Compliance
 - d. Any Vice President or Director
 - e. Ethics Hotline (3rd Party Reporting Service) <https://report.syntrio.com/freedomhouse> (anonymous or otherwise)
3. All above must immediately reach out to US Talent & Culture (T&C) - Vice President or Director, hr@freedomhouse.org

Type of Reported Concern:

Sexual or Other Exploitation, Abuse, Harassment, Neglect (Child or At-Risk Adult Related)	Sexual or Other Exploitation, Abuse, Harassment, Bullying, Discrimination (NOT Child or At-Risk Adult Related)	Trafficking in Persons	Whistleblower / Ethics
4. US T&C will ensure immediate well-being of child, at-risk adult, and others involved, ensuring	4. US T&C will ensure immediate well-being of survivor and all involved, ensuring survivor's	4. In addition to reporting through the Freedom House reporting processes, staff/	4. Where no other reporting option is perceived by staff to be viable, the report

<p>victim’s dignity, considerations, needs, and resiliencies are placed at the center of the process. Determinations will be made based on best interests and best possible outcome for the child or at-risk adult who has been exposed to violence, abuse, exploitation, or neglect.</p> <ol style="list-style-type: none"> a. Security confidentially coordinated for support b. Examine safety & minimize risks <ul style="list-style-type: none"> • Is physical safety of child, at-risk adult, or anyone immediately at risk? • What can/should be done to reduce possibility of harm to those involved? c. Agree upon, with those involved, support needed/ desired for those involved <ul style="list-style-type: none"> • Ask what victim needs/wishes to happen • Discuss with victim options for next steps d. Offer discussion with qualified child protection specialist or social worker of same sex (to report or for support) e. Agree on those with absolute “need to know” communication <p>5. Staff receiving a report will enter case in Ethics Hotline system https://report.syntrio.com</p>	<p>dignity, considerations, needs, and resiliencies are placed at the center of the process.</p> <ol style="list-style-type: none"> a. Security confidentially coordinated for support b. Examine safety & minimize risks <ul style="list-style-type: none"> • Is physical safety of anyone immediately at risk? • What can/should be done to reduce possibility of harm to those involved? c. Agree upon, with those involved, support needed/ desired for those involved <ul style="list-style-type: none"> • Ask what survivor needs/wishes to happen • Discuss with survivor options for next steps d. Offer discussion with qualified specialist or counselor of same sex (to report or for support) e. Agree on those with absolute “need to know” communication <p>5. Staff receiving a report will enter case in Ethics Hotline system https://report.syntrio.com/freedomhouse if not already entered</p> <p>6. US T&C will immediately formulate and implement an expedient investigation plan for resolution of the matter,</p>	<p>survivors may supplement their report by reaching out to the Global Human Trafficking Hotline 1-844-888-FREE or help@befree.org</p> <p>5. US T&C will ensure immediate well-being of survivor and all involved, ensuring survivor’s dignity, considerations, needs, and resiliencies are placed at the center of the process.</p> <ol style="list-style-type: none"> a. Security confidentially coordinated for support b. Examine safety & minimize risks <ul style="list-style-type: none"> • Is physical safety of anyone immediately at risk? • What can/should be done to reduce possibility of harm to those involved? c. Agree upon, with those involved, support needed/ desired for those involved <ul style="list-style-type: none"> • Ask what survivor needs/wishes to happen • Discuss with survivor options for next steps d. Offer discussion with qualified specialist or counselor of same sex (to report or for support) e. Agree on those with absolute 	<p>may be made to the Chair of the Board of Directors, or the Board Audit Committee.</p> <p>5. US T&C will ensure immediate well-being of all involved.</p> <ol style="list-style-type: none"> a. Security & Compliance confidentially coordinated for support b. Examine safety & minimize risks <ul style="list-style-type: none"> • Is physical safety of anyone immediately at risk? • What can/should be done to reduce possibility of harm to those involved? • What can/should be done to reduce possibility of harm/damage to Freedom House assets, property, systems, funds, etc. c. Agree upon, with those involved, any support needed/ desired for those involved and steps to safeguard assets, as well as options for next steps d. Offer discussion with qualified specialist or counselor for those involved (to report or for support)
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<p>/freedomhouse if not already entered</p> <p>6. US T&C will immediately formulate and implement an expedient investigation plan for resolution of the matter, including touch-points with victim and those with need-to-know.</p> <p>7. US T&C will provide a confidential briefing only for those with need-to-know, including (unless implicated in concern):</p> <ol style="list-style-type: none"> President Executive Vice President Chief Operating Officer VP, T&C Security Director of Grants Administration & Compliance <p>The following may also be briefed if need-to-know is clear and not implicated in concern:</p> <ul style="list-style-type: none"> VP of team(s) implicated, if appropriate Finance Director and/or Controller, if appropriate COP/Country Director <p>8. The Chief Operating Officer will determine, with consult from those listed above and consideration of best interest of child or at-risk adult, if information should be shared or contact made with the following, the specific information to be shared, and the order contact will be made:</p>	<p>including touch-points with survivor and those with need-to-know.</p> <p>7. US T&C will provide a confidential briefing only for those with need-to-know, including (unless implicated in concern):</p> <ol style="list-style-type: none"> President Executive Vice President Chief Operating Officer VP, T&C Security Director of Grants Administration & Compliance <p>The following may also be briefed if need-to-know is clear and not implicated in concern:</p> <ul style="list-style-type: none"> VP of team(s) implicated, if appropriate Finance Director and/or Controller, if appropriate COP/Country Director <p>8. The Chief Operating Officer will determine, with consult from those listed above and consideration in best interest of survivor, if information should be shared or contact made with the following, the specific information to be shared, and the order contact will be made:</p> <ol style="list-style-type: none"> Local law or other authorities Board (chair, committee chair or member, etc) Subject of the complaint (and any steps such as 	<p>“need to know” communication</p> <p>6. Staff receiving a report will enter case in Ethics Hotline system https://report.syntrio.com/freedomhouse if not already entered</p> <p>7. US T&C will immediately formulate and implement an expedient investigation plan for resolution of the matter, including touch-points with survivor and those with need-to-know.</p> <p>8. US T&C will provide a confidential briefing only for those with need-to-know, including (unless implicated in concern):</p> <ol style="list-style-type: none"> President Executive Vice President Chief Operating Officer VP, T&C Security Director of Grants Administration & Compliance <p>The following may also be briefed if need-to-know is clear and not implicated in concern:</p> <ul style="list-style-type: none"> VP of team(s) implicated, if appropriate Finance Director and/or Controller, if appropriate COP/Country Director <p>9. The Chief Operating Officer will determine, with consult from those listed above and</p>	<p>e. Agree on those with absolute “need to know” communication</p> <p>6. Staff receiving a report will enter case in Ethics Hotline system https://report.syntrio.com/freedomhouse if not already entered</p> <p>7. US T&C will coordinate with Director of Grants Administration & Compliance (GAC) to agree upon who will lead investigation based on circumstances of concern, and immediately formulate and implement an expedient investigation plan for resolution of the matter, including touch-points with those with need-to-know.</p> <p>8. Investigation Lead (US T&C or GAC) will provide a confidential briefing only for those with need-to-know, including (unless implicated in concern):</p> <ol style="list-style-type: none"> President Executive Vice President Chief Operating Officer VP, T&C Security Director of Grants Administration & Compliance <p>The following may also be briefed if need-to-know is clear and not implicated in concern:</p>
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<p>a. Local law or other authorities</p> <p>b. Board (chair, committee chair or member, etc)</p> <p>c. Subject of the complaint (and any steps such as suspension with pay, instructions to safeguard complainant)</p> <p>9. The Director of Grants Administration & Compliance will determine funder notification requirements, which may include the AO/AOR, Mission Director, Inspector General, US Ambassador. Whenever credible information is received from any source that alleges safeguarding violations against children or at-risk adults, including sexual or other exploitation, sexual or other abuse including child abuse, sexual or other harassment, or child neglect, USAID funding requires the immediate informing, in writing, of the Bureau for Management, Office of Management Policy, Budget, and Performance, Responsibility, Safeguarding, and Compliance Division, disclosures@usaid.gov, with copy to the Agreement Officer, and USAID Office of Inspector General (OIG). Freedom House will protect and will not share any personally identifiable information</p>	<p>suspension with pay, instructions to safeguard complainant)</p> <p>9. The Director of Grants Administration & Compliance will determine funder notification requirements, which may include the AO/AOR, Mission Director, Inspector General, US Ambassador. Whenever credible information is received from any source that alleges sexual or other exploitation, sexual or other abuse, or sexual or other harassment, USAID funding requires the immediate informing, in writing, of the Bureau for Management, Office of Management Policy, Budget, and Performance, Responsibility, Safeguarding, and Compliance Division, disclosures@usaid.gov, with copy to the Agreement Officer, and USAID Office of Inspector General (OIG). Freedom House will protect and will not share any personally identifiable information related to the individuals in the case unless specifically requested by the Agency or the Office of the Inspector General.</p> <p>10. As soon as practicable, the Director, Grants Administration & Compliance will provide in writing to the funder,</p>	<p>consideration in best interest of survivor, if information should be shared or contact made with the following, the specific information to be shared, and the order contact will be made:</p> <p>a. Local law or other authorities</p> <p>b. Board (chair, committee chair or member, etc)</p> <p>c. Subject of the complaint (and any steps such as suspension with pay, instructions to safeguard complainant)</p> <p>10. Whenever credible information is received from any source alleging a violation of the Trafficking policy, the cognizant Agreement/Grant Officer and the agency Inspector General will be immediately notified by Freedom Houses' Director, Grants Administration & Compliance of the specific nature of the activity, including specific remedial actions taken. Freedom House will protect and will not share any personally identifiable information related to the individuals in the case unless specifically requested by the Agency or the Office</p>	<ul style="list-style-type: none"> • VP of team(s) implicated, if appropriate • Finance Director and/or Controller, if appropriate • COP/Country Director <p>9. The Chief Operating Officer will determine, with consult from those listed above and consideration in best interest of those involved, if information should be shared or contact made with the following, the specific information to be shared, and the order contact will be made:</p> <p>a. Local law or other authorities</p> <p>b. Board (chair, committee chair or member, etc)</p> <p>c. Subject of the complaint (and any steps such as suspension with pay, instructions to safeguard complainant)</p> <p>10. The Director, Grants Administration & Compliance will determine funder notification requirements, which may include the AO/AOR, Mission Director, Inspector General, US Ambassador. Whenever credible information is received from any source that alleges fraud,</p>
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<p>related to the individuals in the case unless specifically requested by the Agency or the Office of the Inspector General.</p> <p>10. As soon as practicable, the Director, Grants Administration & Compliance will provide in writing to the funder, as required, (i) additional information on any actions planned or taken in response to the allegation; and (ii) any actions planned or taken to assess, address, or mitigate factors that contributed to the incident.</p> <p>11. At investigation conclusion, disciplinary actions will be taken, up to and including termination of employment/ engagement, for anyone for which the preponderance of evidence substantiates they have violated the policies within this Safeguarding Framework.</p> <p>12. T&C will communicate closure of investigation with victim.</p> <p>13. T&C will create and implement a follow-up plan with victim.</p> <p>14. T&C will create and implement a follow-up plan to ensure corrective actions are effective.</p>	<p>as required, (i) additional information on any actions planned or taken in response to the allegation; and (ii) any actions planned or taken to assess, address, or mitigate factors that contributed to the incident.</p> <p>11. At investigation conclusion, disciplinary actions will be taken, up to and including termination of employment/ engagement, for anyone for which the preponderance of evidence substantiates they have violated the policies within this Safeguarding Framework.</p> <p>12. T&C will communicate closure of investigation with survivor.</p> <p>13. T&C will create and implement a follow-up plan with survivor.</p> <p>14. T&C will create and implement a follow-up plan to ensure corrective actions are effective.</p>	<p>of the Inspector General.</p> <p>11. The Director, Grants Administration & Compliance will further determine any additional funder notification requirements, which may include the Mission Director, Inspector General, or US Ambassador.</p> <p>12. At investigation conclusion, disciplinary actions will be taken, up to and including termination of employment/ engagement, for anyone for which the preponderance of evidence substantiates they have violated the Trafficking in Persons policy.</p> <p>13. T&C will communicate closure of investigation with survivor.</p> <p>14. T&C will create and implement a follow-up plan with survivor.</p> <p>15. T&C will create and implement a follow-up plan to ensure corrective actions are effective.</p>	<p>embezzlement, or financial mismanagement, USAID funding requires immediate informing, in writing, of the Bureau for Management, Office of Management Policy, Budget, and Performance, Responsibility, Safeguarding, and Compliance Division, disclosures@usaid.gov, with copy to the Agreement Officer, and USAID Office of Inspector General (OIG).</p> <p>11. As soon as practicable, the Director, Grants Administration & Compliance will provide in writing to the funder, as required, (i) additional information on any actions planned or taken in response to the allegation; and (ii) any actions planned or taken to assess, address, or mitigate factors that contributed to the incident.</p> <p>12. Freedom House will protect and will not share any personally identifiable information related to the individuals in the case unless specifically requested by the Agency or the Office of the Inspector General.</p>
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		<p>13. The Chief Operating Officer will advise the Chair of the Board of Directors of all complaints relating to accounting or alleged financial improprieties and their resolution.</p> <p>14. At investigation conclusion, disciplinary actions will be taken, up to and including termination of employment/ engagement, for anyone for which the preponderance of evidence substantiates they have violated the policies within this Safeguarding Framework.</p> <p>15. T&C will communicate closure of investigation with the complainant.</p> <p>16. T&C will create and implement a follow-up plan to ensure corrective actions are effective.</p>
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Confidentiality

Freedom House recognizes and respects the need for confidentiality and protection of all individuals involved in incidents related to child safeguarding and at-risk adult protection. All necessary measures will be taken to protect the privacy and safety of victims/survivors and witness and ensure that all individuals involved in the reporting and investigation are treated with dignity and respect. All documentation related to cases will be kept security within the secure, online third party Ethics Hotline reporting system.

Investigation

All reports of child and at-risk adult abuse and mistreatment will be taken seriously. Each case will be investigated and responded to in a timely and sensitive manner. This includes reporting to relevant authorities if required and providing support to victims/survivors as needed.

Reporting Process Components

Anonymous Reporting

Freedom House maintains a third-party secure Ethics Hotline reporting system, <https://report.syntrio.com/freedomhouse>, to ensure anyone who wishes to file a report of possible misconduct, anonymously or otherwise, has recourse. All disclosures will be treated in confidence to the extent possible; only those with a clear “need to know” will be informed, and any complainant who shares their contact information will be consulted. The fact that a report is made anonymously does not mean that it bears less substance than one in which the complainant identifies and is prepared to give evidence. Anonymous complaints will be treated as seriously as named complaints, though the extent to which anonymous complaints can be investigated may be circumscribed by anonymity.

Anonymous reporting is also available via additional methods, including:

Anonymous Reporting App: Detailed app instructions download can be found [here](#)

Keyword: ***freedomhouse***

Toll-free, direct dial telephone numbers:

- o English-speaking USA and Canada: 833-214-2442
- o Spanish-speaking USA and Canada: 800-216-1288
- o French-speaking Canada: 855-725-0002
- o Spanish-speaking Mexico: 800-681-5340
- o All other countries: 800-603-2869 (must dial the country access code first).

[Click here](#) for access codes & dialing instructions.

Please note that toll-free services outside of North America require an access code, may be subject to inconsistent connectivity, and may be unavailable in some locations. Calls in languages other than English require the use of third-party translators which adds 2 to 4 minutes to call wait times while a translator is located and patched onto the call.

E-mail: reports@lighthouse-services.com (must include “Freedom House” with report)

Fax: (215) 689-3885 (must include “Freedom House with report)

Third Party Reports

Third-party reports are complaints brought by someone other than the affected person. A complaint can be made by anyone who is concerned that staff, contractors, independent consultants, or partners have engaged in misconduct against another individual associated with Freedom House. The complaint does not have to be made by the affected person. Like anonymous reports, third-party reports will be treated in confidence to the extent possible, as noted above, and will be taken seriously.

Confidentiality and Safety of Complainant and Witnesses

Freedom House is committed to protecting and maintaining the privacy and confidentiality of all parties, to the extent possible, when handling misconduct complaints. Freedom House also takes a duty of care approach to protecting the safety of complainants and witnesses. In each situation, Freedom House will consider the health and safety needs of its staff and program participants or beneficiaries and develop a plan of action to address identified needs, to the extent possible. Complete confidentiality may not be possible in all cases, however, as names and circumstances may have to be revealed in the course of investigation to ensure accuracy and confirmation of details. In such cases, names and circumstances will

only be revealed on a “need-to-know” basis and the complainant will be made aware that such information will be shared.

Investigations

Freedom House will conduct a thorough, expedient, and confidential, to the extent possible, investigation into all misconduct allegations. Staff who are alleged to have engaged in sexual misconduct will be suspended, with pay, pending the outcome of the investigation. If Freedom House determines that the preponderance of evidence substantiates violation of the policies within this Safeguarding Framework has occurred, prompt remedial action will be taken with the subject of the complaint, including termination of employment or separation from engagement with Freedom House.

Retaliation and False Reporting

Retaliation of any kind for reports of misconduct is strictly prohibited and will not be tolerated. Any retaliation committed against a reporting party or witness will result in immediate termination of employment or separation from engagement with Freedom House. Anyone who believes they are being retaliated against for making a complaint should report it to the Director of Global Talent & Culture or the Vice President of Talent & Culture.

Anyone filing a complaint concerning a suspected violation must act in good faith and have reasonable grounds for suspecting a violation. Intentional false reporting of misconduct is also prohibited and will result in disciplinary action up to and including termination. Those reporting in good faith, however, are protected from retaliation, even if the allegations reported are determined not to constitute wrongful conduct.

APPENDIX 1

FREEDOM HOUSE SAFEGUARDING COMPLIANCE PLAN⁶

PURPOSE

This Safeguarding Compliance Plan (“Plan”) describes the policies and procedures established and implemented by Freedom House to comply with the U.S. Government’s zero-tolerance policy regarding trafficking in persons (TIP), exploitation, sexual abuse, child abuse, and child neglect by federal award recipients in accordance with federal rules and regulations. The purpose of this plan includes, but is not limited to, the following:

1. Make Freedom House employees aware of the conduct prohibited under the Freedom House Safeguarding Framework and the actions that may be taken for violations of the Safeguarding Framework and this Plan;
2. Ensure fair recruitment, compensation and housing practices; and,
3. Prevent prohibited trafficking activities by subrecipients and their employees (at any tier) and any other agents;
4. Monitor, detect and take remedial action against those who engage in such activities.

APPLICATION

The scope of this Plan sets out Freedom House’s baseline standards for safeguarding compliance and applies to the operations and activities under U.S. government funded Awards including Grants, Cooperative Agreements, Contracts and Subawards made to Freedom House with an estimated value of \$500,000 or more for services to be performed outside the United States. Freedom House will provide a copy of this Plan to the cognizant agency Agreement or Grant Officer, or Prime Awardee where Freedom House is a Subrecipient, upon request. This Plan is designed to be appropriate to the size and complexity of the Award and the nature and scope of its activities, considering the specific risks of the operating context.

Freedom House has adapted this Plan for the following program:

PROGRAM NAME:

PROGRAM NUMBER:

NAME AND CONTACT INFORMATION OF THE PERSON RESPONSIBLE FOR PLAN:

LOCATION:

⁶ **Instructions:** Staff must adapt or modify this Compliance Plan as necessary to ensure that it is appropriate to the size and complexity of the Program and to the nature and scope of its activities. Complete the Application section and make adjustments throughout as needed. Please consult the Grants Administration and Compliance (GAC) Department with any questions.

PROGRAM PERIOD OF PERFORMANCE:

AWARDING AGENCY:

GRANT / AGREEMENT OFFICER:

List of Project Subawardees Covered by the Plan		
Name	Address	Compliance Plan (Y/N)

Compliance Procedures

Preventive Measures

Freedom House’s Safeguarding Policy implements measures to reduce the risk of trafficking in persons (TIP), exploitation, sexual abuse, child abuse and child neglect. This includes an awareness program, reporting process, recruitment and wage plan, housing plan and subrecipient compliance requirements. Freedom House also has strict policies to minimize unsupervised interactions with children in all project activities that may involve children and adhering with applicable laws, regulations, or customs regarding harmful image-generating activities of children.

Awareness Program

All Freedom House staff, contractors, independent consultants, partners, agents, interns and any other person provided access or contact with program participants or beneficiaries are informed of the prohibited activities related to trafficking in persons, exploitation, sexual abuse, child abuse, and child neglect and about how to report incidents and allegations, and actions that will be taken for any violations. All Freedom House staff receive safeguarding training, sign a statement acknowledging their understanding of the Freedom House Safeguarding Framework polices, and their agreement and commitment to abide by the policy. Copies of the Safeguarding Framework and this Plan are made available to staff on Freedom House’s SharePoint site and are also available on the external facing website. Non-staff, program participants or beneficiaries and local community members are made aware of prohibited activities and how to report allegations through related materials available at Freedom House local offices and project sites, including TIP and Safeguarding posters. Freedom House ensures that dissemination of this information is inclusive, culturally appropriate and context sensitive.

Reporting Process

All Freedom House staff are **required** to report, confidentially and without retaliation, any activity or condition that may violate Freedom House’s Safeguarding Framework using the [Reporting Process](#) contained in the Framework. In addition, staff and others covered under the policies may report the concern anonymously or otherwise via the Ethics Hotline <https://report.syntrio.com/freedomhouse>. Anyone may supplementally report trafficking in persons concerns directly to the Global Human Trafficking Hotline at 1-844-888-FREE or its email address at help@befree.org. Freedom House has

implemented appropriate safeguards to protect whistleblowers and survivors, including protection against retaliation for reporting, documenting procedures for protecting personally identifiable information (PII) from unauthorized access and disclosure, and measures to protect survivors or witnesses to activities prohibited.

In the event of a receipt of credible information alleging a violation trafficking in persons, exploitation, sexual abuse, child abuse, and child neglect policies, Freedom House will immediately notify the cognizant Agreement/Grant Officer, the Office of Inspector General (OIG), and the Bureau for Management, Office of Management Policy, Budget, and Performance, Responsibility, Safeguarding and Compliance Division as applicable of the specific nature of the activity, including specific remedial actions taken, and take appropriate corrective and preventive action, up to and including the dismissal of employees and/or termination of subrecipients or other third-parties.

Recruitment and Wage Plan

Freedom House strictly prohibits misleading or fraudulent recruiting practices during the recruitment of both national, refugee, and migrant employees. All labor recruiters working for or with Freedom House and its suppliers and sub-contractors have committed to provide complete and accurate information to all employees regarding the working assignment they are being offered. Freedom House only permits the use of recruitment companies with trained employees, prohibits charging recruitment fees to the employee and ensures that wages meet applicable host-country requirements or explains any variance.

Housing Plan

Freedom House requires that housing provided directly or through third-party entities for all staff or subcontracted staff meet host country housing and safety standards.

Subrecipient Compliance

Freedom House has developed procedures to prevent subrecipients and their employees, or any other agents at any tier and at any dollar value from engaging in prohibited activities and to monitor, detect, and terminate any that have engaged in such activities.

1. All Freedom House Subrecipients with U.S. Government-funded awards, where the work will be performed outside of the US and with a value of more than \$500,000, must provide Freedom House with a compliance plan prepared in accordance with the TIP, exploitation, sexual abuse, child abuse and child neglect regulations, and certify that their employees or any other agents at any tier and at any dollar value have not engaged in prohibited activities;
2. Subrecipients certify prior to subaward and annually thereafter that they have implemented a compliance plan, that they comply with US regulations, and that after conducting due diligence, either:
 - a. to the best of their knowledge and belief, neither the subrecipient and their employees nor its agents has engaged in prohibited activities, or;
 - b. if abuses relating to any of the prohibited activities have been found, the subrecipient has taken the appropriate remedial and referral actions.
3. Subrecipients, their employees or any other agents must adhere to all applicable TIP, exploitation, sexual abuse, child abuse and child neglect regulations when performing activities for or on behalf of

Freedom House. Freedom House includes language to this effect in all subawards including references to the safeguarding regulations where applicable. All Freedom House Subrecipients are required by contract to fully cooperate with any investigation into allegations of prohibited activities.

4. In the event of a receipt of credible information alleging a violation of the TIP, exploitation, sexual abuse, child abuse and child neglect policies or regulations by a Subrecipient, Freedom House will immediately:

- investigate, report, and address accordingly;
- take appropriate corrective and preventive action, up to and including requiring the Subrecipient to dismiss an individual or individuals, or termination of subaward.

5. All Subrecipients have agreed to on-going monitoring and random auditing by Freedom House or its agents for compliance with safeguarding regulations, and Freedom House's TIP, exploitation, sexual abuse, child abuse, and child neglect policies.

6. Failure to comply with the TIP, exploitation, sexual abuse, child abuse, and child neglect requirements is grounds for Freedom House to take any and all appropriate actions, up to and including immediate termination of the Subrecipient's agreement with Freedom House.

APPENDIX 2

COMPLIANCE PLAN CERTIFICATION⁷

[INSERT ENTITY NAME] certifies the following:

- It has implemented a compliance plan and procedures to prevent any prohibited activities identified in section (a) of the Mandatory Provision, Trafficking in Persons and is in compliance with that plan,
- It has implemented procedures to monitor, detect, and terminate any employee, agent, subrecipient/subcontractor or employee of subrecipient/subcontractor engaging in prohibited activities; and;
- To the best of its knowledge and belief, based on ongoing compliance activities, neither [INSERT ENTITY NAME], nor any of its agents, subrecipients/subcontractors, or their agents, are engaged in prohibited trafficking-related activity as described in section (a) of the Mandatory Provision “Trafficking in Persons” or
- If there are any reported or credible information of abuses received from any source alleging conduct that violates section (a) of the Mandatory Provision “Trafficking in Persons”, [INSERT ENTITY NAME] will take immediate and appropriate remedial action(s) in response to the abuse(s), up to and including termination of the employee, subrecipients, subcontractor employee, or their agent involved.

If there are any identified noncompliance or credible evidence that alleges human trafficking-related activity, [INSERT ENTITY NAME] will ensure that the pertinent details are provided to the appropriate person(s) for possible imposition of remedies.

[Insert Entity Name] Signature

Title

Date of Certification

⁷ This Certification will be requested by a federal agency during the granting process for federal awards that exceed \$500,000 or more of funding for services to be performed outside the United States. Freedom House will also require it for any subrecipients/subcontractors receiving \$500,000 or more of USG funding for services to be performed outside the United States.