

## **Spero Safeguarding Policy**

### **Purpose**

Spero is committed to creating and maintaining an environment that protects and honors the rights and dignity of all people, especially children and vulnerable adults, to live free from abuse, exploitation and harm.

These policies and related procedures describe Spero's commitment to Safeguarding. The purpose of the policy is to ensure that Spero is safe for children and vulnerable adults by promoting awareness and mitigating the risk of actual harm that may come to children and vulnerable adults by employees, representatives, or volunteers.

Approver: Board of Directors

Effective Date: 3/1/2021

### **Definitions**

Child - Anyone under 18 years of age.

Vulnerable Adult - Anyone 18 years of age or older who, for physical or mental reasons, is unable to look after themselves or their finances.

Harassment - Unwanted, unwelcomed and uninvited behavior that demeans, threatens or offends and results in a hostile environment.

Bullying - Persistent and repeated mistreatment of one or more targeted persons by one or more perpetrators.

Sexual Harassment - Specific type of harassment which can cross age and gender boundaries and may include unwelcome sexual advances; requests for sexual favors; verbal or physical conduct or gesture of a sexual nature; or any other behavior of a sexual nature that might reasonably be expected/perceived to cause offense or humiliation to another.

Exploitation - Use of force or other forms of coercion, abduction, fraud, deception, abuse of power or position of vulnerability; or the giving and receiving of payments or benefits to achieve the consent of a person having control over another person.

Abuse - deliberate act of ill treatment that can harm a person's safety, well-being, dignity and development.

Trafficking - Recruitment, transportation, or receipt of persons by means of deception, coercion, threat, or force for the purpose of exploitation, such as labor, prostitutions, or sexual exploitation.

## Policy

### I. Policy Overview

Spero works with partners in difficult contexts around the world. We are committed to creating and maintaining an environment that promotes human dignity and prevents abuse and exploitation of Spero's employees, partners, and most importantly beneficiaries.

Spero staff, including Board Members and volunteers, as well as partners are:

- Required to treat all people with respect; actively prevent all forms of harassment, abuse, and exploitation including all forms of sexual misconduct and trafficking; ensure programming and interventions do not cause harm to communities where we work
- Prohibited from facilitating or aiding other humanitarian worker's harassing, abusive or exploitative behavior
- Obligated to report (per guidelines in sections VII) any concern or suspicion of harassment, abuse, or exploitation including sexual misconduct and trafficking

All reports prompt a thorough assessment including a possible investigation. Any substantiated violation of our policy results in appropriate action that may include termination of employment and reporting to the appropriate local authorities.

### II. Physical and Emotional Safeguarding

Spero condemns trafficking in human beings as a criminal act that violates human rights. All Spero staff, board members, representatives, volunteers, and partners are prohibited from engaging in trafficking in children, women and men. Spero places a special focus on anti-trafficking. All Spero staff, board members, representatives, volunteers, and partners are prohibited from employment practices related to trafficking as well as knowingly obtaining work-related goods or services that have been provided or produced by trafficked or forced labor.

Spero seeks to mitigate child safeguarding risks. As such Spero staff, board members, representative, and volunteers, must **never**:

- act in ways that may be abusive or place children at risk of abuse
- hit, physically assault or physically abuse children or threaten to do so
- engage in behaviors that are physically inappropriate or sexually provocative
- engage in sexual activity or have a sexual relationship with anyone under the age of 18 years irrespective of the age of the majority/consent or local custom
- stay alone overnight with one or more children that benefit from Spero or a partnering organization that are not part of their family

- sleep in the same bed as a child beneficiary of Spero or a partnering organization who is not part of their family
- exchange personal contact information or ask for children's personal information
- develop relationships with children which could in any way be deemed exploitative or abusive
- use language, make suggestions or offer advice to children which is inappropriate, offensive or abusive
- do things for children beneficiary of a personal nature that they can do themselves (e.g. toileting, dressing, feeding, washing)
- enter the sleeping quarters of institutionalized children while children are present
- condone or participate in behavior of children which is unsafe or illegal
- act in ways that shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse
- Discriminate again, show unfair preferential or differential treatment towards particular children to the exclusion of others
- Ask to meet children away from other adults or spend excessive time along with children away from others in a manner which could be interpreted as inappropriate
- Expose children to inappropriate images, films, music and websites including mature content, indecent images (pornography) and violence.

This is not an exhaustive or exclusive list. Spero staff, board members, representatives and volunteers must never place themselves in a position where they are made vulnerable to allegations of misconduct.

### III. Data Management and Use

Spero is committed to ensure data is kept securely either via hosting services or on computer information. It is recommended that organizations complete due diligence in selecting, operating and maintaining such systems that house personal data. In the instance of requests and sharing of data, Spero and its partners are committed to ensure the identity protection of the individuals they serve. Such information that should be withheld or changed is personal identification information such as, but not limited to Social Security number or equivalent, DOB, Legal Name, address, phone number and email address.

### IV. Photo Use

Photography or videography of children and vulnerable adults may only take place if all of the following elements of protection are strictly adhered to:

- a. Coverage/Clothing: Children must not be photographed, filmed or otherwise pictorially represented in any state of undress.

- b. Dignity: The image, video and/or story must present the child in a state or quality of being worthy of honor and respect.
- c. Releases: Releases are required, and may be obtained verbally in the native language of the subject if the subject is unable to read. Releases include informing the child and his/her guardian in their preferred language of the intended use of the photo, film or story.
- d. Identity Protection: Spero must protect the identity of high-risk children and vulnerable adults. Identity protection, including changed name and obscured visual identity is required when the child or vulnerable adult is identified as:
  - i. A victim of sexual abuse or exploitation
  - ii. A perpetrator of physical or sexual abuse
  - iii. Charged or convicted of a crime
  - iv. A current or former child combatant
  - v. HIV positive, living with AIDS or has died from AIDS
  - vi. Any child or vulnerable adult who does not wish to be named and identifiable, or whose parent/guardian does not wish the child to be named and identifiable.

#### V. Social Media Use

Spero staff, representatives, and volunteers must be mindful when using professional and personal social media accounts such as FaceBook, Twitter, Instagram and the like.

- a. Discussing or sharing any sensitive, confidential or internal matters concerning children or vulnerable adults, their data, or safeguarding violations is prohibited on social media.
- b. It is not acceptable to accept or make friend/connection requests from/to any child or vulnerable adult that receives services through Spero or our partner organizations.
- c. Posting pictures of children or vulnerable adults outside of the context of the photo use policy is strictly prohibited.

#### VI. Partner Policy Accountability

Pre-Partnership Transparency - Partner organizations are required by Spero to review and document where or what policies or procedures are in place that address the individual sections of this policy document. If there are exceptions, partner organizations must document the exception and why.

Annually - Partner organizations will review their initial or prior year responses and determine if there have been any changes to the policies or procedures. If so, partner organizations will provide explanations of the new policies or procedures. If there are exceptions, partner organizations will document the exception and why.

After these have been received, the Executive Director of Spero will review the responses and present to the board for any possible shortcomings or areas of concern.

## VII. Violation of Policy Reporting Obligation

All Spero staff, board members, representatives, and volunteers are obligated to report any concerns or suspicions of harassment, abuse and exploitation involving Spero staff, partners, or beneficiaries. All reports will be promptly investigated and addressed per the procedures outlined herein:

- a. Any allegations of violations to this policy are to be promptly (within 72 hours) brought to the attention of the Executive Director and President of the Board of Spero. Should the allegation be concerning the Executive Director information should be brought to the President of the Board and Secretary of the Board. Should the allegation be concerning the President of the Board the information should be brought to the Executive Director and Secretary of the Board.
- b. It is the responsibility of the Executive Director and Board of Directors to follow up on any and all allegations of violation to this policy promptly (within 72 hours). This includes contacting any other Boards of Directors of the organization that may be involved. Spero takes child protection violations seriously and upholds the rule of law in each sovereign nation where we partner. As such, local law enforcement will be contacted in the event of a policy violation that also violates state laws.
- c. Spero will not tolerate violations of child protection by partner organizations. A violation of this child protection policy is cause for termination of the partnership as determined by the Executive Director and Board of Directors.