

# EarthRights Safeguarding Policy

Last Updated: December 2025

## Scope

This policy applies to all EarthRights Employees, Interns, Fellows, Board Members, Contractors, Volunteers, Implementing Partners, and Vendors (EarthRights Staff and Associates).

## Policy Statement

EarthRights believes that everyone we encounter, regardless of race, religion, age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. EarthRights will not tolerate abuse and exploitation by staff or associated personnel. All EarthRights Staff Associates are obligated to foster an environment where Exploitation, Sexual Exploitation, Sexual Abuse, Sexual Harassment, and Child Abuse are not tolerated, and they are required to take action to prevent such behaviors. EarthRights commits to addressing safeguarding throughout its work, through the three pillars of: prevention, reporting, and response.

## Purpose

The objective of this Safeguarding Policy is to establish clear standards that align with EarthRights' zero-tolerance approach to Harm, including Exploitation, Sexual Exploitation, Sexual Abuse, Sexual Harassment, and Child Abuse. The purpose of this policy is to protect people, particularly children, at-risk adults, and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with EarthRights. This includes harm arising from:

- The conduct of any EarthRights Staff and Associates.
- The design and implementation of EarthRights programs and activities.

EarthRights recognizes that all children should be protected from all forms of abuse, neglect, exploitation, harassment, and violence. EarthRights also recognizes that safeguarding at-risk adults (including but not limited to those with disabilities or belonging to marginalized groups) is the responsibility of all staff and personnel associated with EarthRights and therefore all should play a part in preventing harm and detecting and reporting neglect and abuse. This Safeguarding Policy lays out the commitments made by EarthRights, and informs staff and associated personnel of their responsibilities in relation to safeguarding.

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under EarthRights’ Anti-Harassment Policy.
- Safeguarding concerns in the wider community not perpetrated by EarthRights Staff and Associates.

## **What is safeguarding?**

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment, from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.

Safeguarding applies consistently and without exception across our programs, partners and staff. It requires proactively identifying, preventing, and guarding against all risks of harm, exploitation, and abuse and having accountable and transparent systems for response, reporting, and learning when risks materialize. Those systems must be survivor-centered and also protect those accused until proven guilty.

## **Prevention**

EarthRights will:

- Ensure all EarthRights Staff and Associates have access to, are familiar with, and know their responsibilities within this policy. This will be done through a variety of measures, including, but not limited to, circulating the policy among relevant EarthRights Staff and Associates, posting this policy on EarthRights’ website in multiple languages, conducting training, and including relevant language in all subgrants and contracts.
- Design and undertake all its programs and activities in a way that protects people from any risk of Harm that may arise from their coming into contact with EarthRights.
- Implement stringent safeguarding procedures when recruiting, managing, and deploying staff and associated personnel.
- Ensure EarthRights Staff and Associates receive training as needed or required on safeguarding at a level commensurate with their role in the organization.
- Follow up on reports of safeguarding concerns promptly and according to due process.
- Ensure that this Safeguarding Policy is embedded throughout the employee life cycle, including safer recruitment, onboarding, performance management, professional development, and offboarding.
- Implement appropriate screening and vetting procedures to prevent the hiring of perpetrators of misconduct.

- Ensure that information on this Safeguarding Policy and how to access it is displayed at prominent places within the headquarters office, as well as online, and to make it accessible to all Employees in different languages and formats.
- Ensure that all new Employees read this Safeguarding Policy, agree to its Code of Conduct, and take Safeguarding Policy training, as relevant, upon hiring.

EarthRights Staff and Associates must not engage in the following conduct:

- Sexual activity with anyone under the age of 18 regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense.
- Sexual abuse or exploitation of children or at risk adults.
- Subjecting a child or an at risk adult to physical, emotional or psychological abuse, or neglect.
- Engaging in any commercially exploitative activities with children including child labor or trafficking.
- Exchanging money, employment, goods, or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance.
- Engaging in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics.

Additionally, EarthRights Staff and Associates are required to:

- Uphold the safeguarding standards set out in this policy, in and outside working hours.
- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.
- Report any concerns or suspicions regarding safeguarding violations by and EarthRights Staff or Associates according to this Safeguarding Policy/Whistleblower protection policy.
- Disclose in writing any ongoing romantic or sexual relationship with beneficiary of EarthRights' programs prior to the engagement to EarthRights, including marital or non-marital relationships.
- Obtain informed consent from participants or any other person regarding their participation in research, photography, videos, quotes, and audio recordings before using them in any publication, on any website, or for any public purpose.

## **Confidentiality**

It is essential that confidentiality is maintained to the extent possible at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need-to-know basis only, and will be kept secure at all times.

## **Risk Assessment**

On a yearly basis, EarthRights will conduct a risk assessment of its activities indicating key safeguarding risks, accompanied with a set of measures aimed at risk minimization.

## **Review, Monitoring, and Evaluation**

EarthRights will review the existing policy and procedures annually and implement a method for the monitoring and evaluation of the safeguarding framework.

## **Reporting**

EarthRights will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities with whom we work.

It is the responsibility of all EarthRights Staff and Associates to promptly report violations or suspected violations of this policy in accordance with EarthRights' Whistleblower Policy. Any person who makes a report of such violation or suspected violation is a "Whistleblower." Any staff reporting concerns or complaints through formal whistleblowing channels will be protected and there will be no retaliation against anyone making a good faith report. EarthRights will also accept complaints from external sources such as members of the public, partners, and official bodies.

The Whistleblower should promptly report the suspected or actual violation to his/her supervisor (if the Whistleblower is an EarthRights employee) or the Whistleblower can make a report online using the following link: [www.lighthouse-services.com/earthrights](http://www.lighthouse-services.com/earthrights). If the alleged violation involves the conduct of the Executive Director, the violation should be reported in writing to the Chair of the Board. Board members acting as Whistleblowers should report to the Board Chair unless the alleged violation involves the conduct of the Chair, in which case the Board member should report to any member of the Executive Committee.

## **Response**

Throughout the response process, EarthRights will take a survivor-centric approach, will consider views and requests of the survivor, and will offer support to survivors of harm caused by EarthRights Staff and Associates while engaged in work or visits on behalf of EarthRights. When a child is involved, EarthRights will make a "best interest of the child determination" to guide our response. EarthRights will also take immediate actions to safeguard the victim, to stop harm from occurring, and to prevent further escalation of the incident.

EarthRights will assign a lead investigator who will determine whether the report is credible, by considering the facts reported and, in consultation with expert opinion as necessary, consider if the reported incident(s) represents a breach of safeguarding policy. If there is

insufficient information to investigate the report, and no way to ascertain this information, the report should still be filed in case it can be of use in the future. If the complaint is credible, then it will be investigated internally, or, through external capacity, as necessary. If at any stage of the investigation criminal activity is suspected, the case will be referred to the relevant authorities unless this may pose a risk to anyone involved in the case. The Board of Directors will always be consulted on any reporting to the authorities.

EarthRights will report to the relevant project funder(s) any serious incidents, such as incidents of sexual abuse, exploitation, harassment, domestic violence, or child abuse. EarthRights' reporting to project funder(s) will not compromise the safety, security, privacy, and due process rights of concerned persons. EarthRights will also investigate and report to relevant authorities (for criminal matters) when safe to do so and after considering the wishes of the survivor.

After the investigation:

- If no wrongdoing is found, the report is documented but no action will be taken toward the accused individual;
- If there was no breach of policy, but the survivor felt sufficiently compromised, then the accused individual will receive a verbal warning and the incident will be documented on the record;
- If there was a breach of policy, this is regarded as gross misconduct and the accused individual's employment, relevant agreement, or relationship with EarthRights will be terminated. Depending on the nature of the breach, EarthRights will also notify local authorities for possible criminal liability at any stage of the investigation.

EarthRights will document all actions undertaken, and decisions made resulting from the case, clearly and confidentially. EarthRights will store all information relating to the case confidentially, and in accordance with any applicable data protection laws. EarthRights will record anonymized data relating to the case required for organizational reporting requirements (for instance, incident reporting to the Board, risk assessments, safeguarding reporting to donors), and for organizational learning for dealing with future cases. Finally, EarthRights may conduct an after-action report, determining what worked in the process and what can be improved upon.

## Definitions

**At risk adult:** Sometimes also referred to as vulnerable adult. A person, over 18, who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

**Child:** A person under the age of 18, regardless of the age of majority or age of consent locally

**Child Abuse:** emotional, physical, sexual, or any other ill-treatment carried out against a child by an adult.

**Code of Conduct:** The set of principles and guidelines that EarthRights expects Covered Persons and Participants to follow to prevent and respond to

**Complaint:** A formal or informal report made alleging a breach of the Safeguarding Policy or Code of Conduct.

**Do No Harm:** means avoiding exposing people to additional risks through our actions

**Emotional Abuse:** involves words or acts that Harm a person's emotional, intellectual, mental or psychological well-being or development. This may occur as an isolated event or repeatedly. Emotional Abuse includes, but is not limited to, any humiliating or degrading treatment.

**Employees:** Includes all headquarters Employees, overseas Employees, and third country nationals holding a labor relationship through a contract of services with EarthRights or an EarthRights entity registered outside of the United States in any role, both full-time and part-time, excluding Contractors.

**Exploitation:** the unfair use of someone for one's own benefit when they cannot bargain for themselves. It often involves force, trickery, coercion or trafficking. Exploitation includes the worst forms of child labor, which are defined as slavery, debt bondage, commercial Sexual Exploitation, pornography, forced recruitment of children for use in armed conflict, use of children in drug trafficking and other illicit activities, and all other work Harmful or hazardous to the health, safety or morals of girls and boys aged under 18.

**Harm:** physical or psychological damage or impact caused to an individual, whether it is caused intentionally or accidentally, or by acts or omissions, as a result of their contact with EarthRights or the work of the organization as set out in this Policy. Harm is caused by a broad range of actions or failure to act, including forms of Abuse and Exploitation.

**Physical Abuse:** is the non-accidental and non-defensive use of physical force towards a person, including children, that deliberately or inadvertently causes injury. This may include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing non-accidental physical Harm. It includes corporal punishment of children.

**Safeguarding:** actions taken to prevent and respond to Harm caused to any individual as a result of their contact with EarthRights or the work of the organization.

**Sexual Abuse:** threatened intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes any sexual activities where the survivor could not, did not or did not have the capacity to freely consent. These activities may involve physical contact, including assault by penetration or non-penetrative acts. They may also include non-

contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities or encouraging children to behave in sexually inappropriate ways.

**Sexual Exploitation:** is 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. This includes a person giving or receiving any kind of benefit in exchange for sex with them or another person. Sexual Exploitation does not always involve physical contact; it can also occur online.

**Survivor/victim:** refers to a person who is, or has been, exploited or abused, including through Sexual Exploitation or Abuse. 'Victim' is a term often used in the legal and medical sectors, while the term 'survivor' is generally preferred in the psychological and social support sectors because it implies resiliency.