Results for Development Institute (R4D) Safeguarding Policy is central to our mission and vision. The policy advances our work with change agents around the globe to create self-sustaining systems that support healthy, educated people. R4D acknowledges our responsibility to protect those with whom we work – with a particular focus on children and vulnerable adults – as well as those who work for and on behalf of the organization. In line with our ethics statement, we aim to be fair and to treat each other with respect and dignity. R4D understands that safeguarding is not a singular or isolated activity; rather, it is a commitment to the continuous improvement of our practices so that we may prevent and mitigate risks. This policy provides the R4D community with direction on our Safeguarding

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1.0 Policy Statement

We recognize that the inherent power dynamic between organizations like ours and those who benefit from our programs heightens the risk of harm and abuse. Inequalities and vulnerabilities – especially those experienced by children, women and persons with disabilities – can be exploited. R4D will not tolerate any form of exploitation, abuse or harassment including any misuse or abuse of power, trust, position, or privilege. Every allegation will be treated seriously, and appropriate action will be pursued to resolve it.

Safeguarding from any form of exploitation, abuse, or harassment – including the protection against sexual exploitation, abuse and harassment (PSEAH) – is the responsibility of every R4D employee and representative, including partners. It is the duty of every R4D employee and other individual engaged by R4D to create a safe environment to prevent safeguarding breaches from materializing. We, therefore, require that every staff and representative (including consultants, sub-awardees, and vendors), report any and all concerns, allegations or incidents that place others at risk of or results in actual harm, abuse or exploitation. It is also the obligation of R4D staff and representatives to report all concerns of workplace harassment and fraternization, as addressed in this policy.

R4D will respond to all reported concerns, allegations and incidents swiftly to ensure the safety of all persons involved, with a particular focus on the needs of the survivors of sexual exploitation and abuse. We will not tolerate retaliation against anyone who has made a safeguarding report or participates in any subsequent investigation. Unsubstantiated concerns reported in good faith will not be subject to any disciplinary or personnel action. Sexual exploitation, abuse and harassment (SEAH) is considered a particularly serious infraction and will be managed in accordance with this policy and our associated investigation procedures.
Every individual working in association with R4D is responsible for ensuring we keep each other, our partners, and program participants — specifically children and vulnerable adults — safe. Everyone involved with R4D must:

- Read this policy and related policies.
- Confirm that they understand this policy and will adhere to it. Confirmation will be requested at least every 12 months and when changes are made to the policy.
- Report any concerns, allegations or incidents within 24 hours in accordance with the reporting procedures in Section 6.
- Observe the two-staff rule, in which engagement with children or vulnerable adults must take place in gender-balanced pairs.
- Refrain from taking photos without verbal or written consent.

2.0 Scope of Application

This policy has been developed to protect children, adults and representatives of R4D from any form of exploitation, abuse and harassment that may occur through direct or indirect contact within or outside of typical operational and programming activities.

This policy applies to:
- All R4D employees and interns
- Suppliers, including consultants, fellows, sub-awardees (subcontractors/subgrantees and subrecipients) and all other individuals and entities that have contractual relationships
- All other R4D representatives including but not limited to volunteers and board members

Every person is accountable for upholding this policy and its procedures, including the mandatory Code of Conduct. R4D will ensure that this policy is flowed to employees, suppliers and representatives.

R4D complies with all national laws in the countries where it is registered. R4D employees and representatives are expected to act in accordance with local protection and welfare legislation in countries where they work or travel. In the event that local legislation contravenes this policy, local legislation or the policy will be applied based on whichever is more stringent. Importantly, in applying this policy R4D defines anyone under the age of 18 as a child, regardless of the age of majority or consent within a local jurisdiction.

3.0 Breaches and Non-compliance

This policy is applicable 24/7, during and outside of normal business hours. Nothing in this policy and procedures, however, requires R4D management to utilize any particular step or series of steps in disciplinary action in a set order. R4D management may impose any level of discipline, including termination of employment, contracts, agreements and representation. Any contravening behaviors that occur outside of business hours will be deemed a breach of this policy and subject to disciplinary action up to and including:

- Issue a written warning
- Suspend/withdraw employment/funding/support to you or your organization and end your or your organization’s relationship with R4D.
- Terminate employment, representative, or supplier contracts and engagement agreements.
- Report the matter to law enforcement and other agencies (where it is safe and appropriate to do so).
4.0 Designated Safeguarding Officer

R4D has appointed Safeguarding Officers to carry out specific activities to ensure the principles and commitments in this policy are embedded in practice. The Designated Safeguarding Officer is responsible for:

- Communicating and enforcing the policy, reporting incidents, and following up on agreed actions.
- Ensuring that all employees, representatives, suppliers, and Board members have access to the policy and procedure and have affirmed commitment to it; this includes ensuring appropriate due diligence on suppliers and identifying possible support for partners to either develop their own or follow R4D policies and procedures.
- Organizing annual training sessions for R4D, and ensuring safeguarding is incorporated into R4D onboarding.
- Deploying annual attestations for R4D employees and Board members.
- Disseminating any policy updates to employees, representatives, suppliers, and Board members.

5.0 Prevention

R4D believes that the best way to prevent sexual exploitation, abuse and harassment is to promote standards of practice that mitigate the risks associated with safeguarding and PSEAH breaches. This policy sets forth the preventative approaches that R4D takes to reduce the likelihood of safeguarding and PSEAH violations. Prevention activities include but are not limited to:

1. All R4D employees, representatives and suppliers will receive and acknowledge this policy. The attestation process will happen at least every 12 months, and Human Resources will retain records of onboarding processes including the provision of this policy.
2. Safe Recruitment is the process through which all candidates are recruited to assess for suitability to work on behalf of R4D and specifically with children and vulnerable adults. As part of our efforts, R4D will:
   a. Include a safeguarding statement job advertisements to reflect our commitment to the safety of children and vulnerable adults.
   b. Conduct background screening in the jurisdictions where the individual has resided, thorough interviewing procedures, and robust reference checks.
   c. Conduct criminal background checks in accordance with legal and donor requirements.
3. Risks will be assessed for research projects and partner-implemented projects, including Assessment of Vulnerability (See Procedures and ANNEX II for Categories of Vulnerability).
4. Personally identifiable information (PII) will be managed in accordance with local laws, regulations and donor requirements.
5. R4D and partner led projects will include considerations for safeguarding activities in project design.
6. Safeguarding commitments are upheld when engaging online, virtually or through indirect communication.
7. Community Engagement is a key part of safeguarding and PSEAH, especially in research projects, and R4D will seek opportunities for community members to share input on how projects can be safely implemented.
8. Supplier contracting instruments will include Safeguarding and PSEAH commitments to prevention, training and awareness raising, reporting and responding. Suppliers shall:
   a. Adopt and adhere to the commitments outlined in this policy, unless the supplier policy is equal to or more stringent than R4D's policy at the time of entering into the agreement;
   b. Engage in Safe Recruitment practices;
   c. Ensure all staff are made aware of Safeguarding and PSEAH commitments;
   d. Implement functional and accessible reporting channels; and
   e. Respond to concerns with a survivor-centered approach and in accordance with developed investigation processes and disciplinary standards.
9. Detection and intervention are a critical part of prevention. Understanding behaviors that are acceptable and prohibited reduces the likelihood of harm, and fosters trust between our organization and program participants. Below are the commitments to children, vulnerable adults and staff that we believe promotes a healthy and safe organizational culture.
Commitments to our Code of Conduct

The safety of everyone involved with R4D — our staff, our partners and our program participants — is paramount to our mission. R4D is committed to the principle of “Do No Harm.” This means that we will avoid exposing children and vulnerable adults to any additional risks that may be introduced through our presence in their community or contact with our programming.

R4D is committed to protecting children and vulnerable adults from all forms of exploitation, abuse and harassment that can occur through direct or indirect contact with anyone working on behalf of R4D and is equally committed to fostering healthy work environments for all staff. The following principles and commitments endeavor to support and sustain a safe and healthy organization. Our code of conduct includes the following commitments:

1. Any form of sexual exploitation, abuse or harassment (SEAH) by R4D employees, suppliers or representatives constitutes an act of gross misconduct and is grounds for disciplinary action, including termination of employment, and R4D will pursue all other available legal remedies.
2. Any sexual activity with any child (a person under the age of 18) is strictly prohibited, regardless of their age of majority or legal consent in the location where the child lives, where the contact occurs, and/or where R4D activities are happening. Mistaken belief of the child's age is not a defense.
3. The exchange of money, employment, goods or services for sex, including sexual favors and other forms of humiliating, degrading or exploitative behavior is a violation of R4D’s policies. This protection applies to all program participants and community members in locations where R4D operates.
4. The improper use of rank or position to engage in a romantic or sexual relationship with any participant of our programs and services or with any colleague is never acceptable. Such relationships are exploitative and undermine the credibility and integrity of R4D’s mission.
5. All concerns, suspicions or known incidents of exploitation, abuse or harassment, including SEAH, by R4D staff, representatives or other organizations’ representatives must be reported through an established reporting channel in accordance with R4D’s reporting policy and procedures.
6. All employees, suppliers and representatives are responsible for creating and maintaining environments that foster safe and healthy work environments – in person and virtually. Managers across R4D have a particular responsibility to support and develop systems to maintain such environments.
7. Physical or verbal assault or abuse of any type is unacceptable.
8. Inappropriate or offensive language, suggestions, advice, or sharing such content via any means of communication with children or vulnerable adults is not permitted.
9. Use of personal email, social media, phones, messaging, or other means of contact not approved by R4D with children, vulnerable adults and other program participants is strictly prohibited.
10. Employees, suppliers and representatives will never exchange personal contact information with children or vulnerable adults.
11. All employees, suppliers and representatives will not coerce, encourage, condone or otherwise engage in behaviors that are illegal, unsafe or abusive.

Commitments to Children and Vulnerable Adults

Preventing exploitation, abuse and harassment in our organization is essential to fulfill the mission of our work. Safeguarding of children and vulnerable adults requires an understanding of how to safely engage them in our work and how to practice vigilance so that we may detect risks or indicators of harm. R4D is committed to:

1. Treating all children and adults with dignity and respect.
2. Observing the right of children and adults to self-determination and autonomy. Their opinions, bodies, and decisions should be respected.
3. Complying with applicable data protection legislation consent requirements prior to engaging children and vulnerable adults in our programming.
4. Engaging with children and vulnerable adults – especially during consent processes – to understand and respond to their concerns.
5. Making sure that children and adults are aware that our programs/services are always free.
6. Ensuring two employees, with consideration to gender-balance, are present during any interaction with children, whether in person or virtual.¹

7. Outside of normal business activities, R4D representatives should not seek out or otherwise engage with children or vulnerable adults participating in programs/services.²

8. R4D believes that all children and adults should be equally protected and assisted regardless of their age, gender or gender expression (including identifying as LGBTQ), race and ethnicity, language, nationality or tribal affiliation, religious or political beliefs, family background, economic status, disability, physical or mental health or criminal background.

9. All decisions regarding the welfare and protection of children are made based on the “Best Interests of the Child” principle, which refers to decisions considering that the child receives maximum benefit possible from services provided, and that the positive impacts of any course of action outweigh any negative impacts.

10. Children in our programs should be given opportunities to express their views on matters affecting them whenever feasible.

11. The United Nations Convention on the Rights of the Child (UNCRC) is the universal foundation for child protection. The fundamental principle of the Convention is that children have their own indivisible rights.³

**Commitments to Employees and Representatives**

This policy also safeguards employees and representatives, including partners by preventing Harassment, Bullying and Fraternization.

1. Harassment
   a. Every employee at R4D is responsible for assuring that our workplace is free from unlawful harassment and is expected to avoid any behavior or conduct that could reasonably be interpreted as harassment. R4D’s non-harassment policy applies to its employees, suppliers and representatives who perform services on behalf of R4D. Any person found to have violated this policy is subject to disciplinary action, up to and including termination.
   b. Forms of sexual harassment include verbal conduct such as sexual innuendos, suggestive comments or sexual propositions; nonverbal conduct such as sexually suggestive objects, pictures, or obscene gestures, display of lewd, suggestive, or sexually graphic email or other documents; and threatened or actual physical unwanted conduct of any kind. This list is not exhaustive but, rather, illustrative of the types of behavior that will be deemed sexually harassing.

2. Bullying
   a. Every employee at R4D is responsible for ensuring that workplace conduct is professional and void of any inappropriate use of power. Whether exerted by an individual or group, R4D will not tolerate any form of bullying.
   b. Forms of bullying include deliberate repetitive physical or psychological behaviors with the intent to injure another person – either physically or emotionally.
   c. R4D employees and representatives, including partners, must refrain from:
      i. Physical bullying which includes pushing, hitting, punching, kicking or any other action causing hurt or injury;
      ii. Verbal bullying which includes insults, taunts, threats and ridicule; and
      iii. Psychological bullying which includes verbal or physical intimidation and ostracism.

3. Fraternization
   a. R4D does not permit dating or romantic relationships between a supervisor and an employee within the direct chain of command of that supervisor, or between two employees with the same supervisor.

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¹ Gender balance has proven to be a protective factor, especially for children and women. Whenever possible and practical at least one R4D employee should be female.
² Employees and representatives related to program participants may have typical contact; however, the policy still governs with respect to using power, trust, position or privilege in any exploitative way.
b. If such a relationship develops, it is the responsibility of both individuals to communicate this to the Human Resources Department immediately. R4D will take action as appropriate to address this situation, including, but not limited to, changing the reporting relationship of the employees, asking for the resignation of one of the employees, or termination of employment.

c. Employees who marry; who become related by marriage; or who become domestic partners are permitted to continue employment with R4D, as long as they are not in a direct supervisory relationship with one another. If such a relationship does exist, R4D will attempt to reassign one of the employees to another position for which they are qualified if such a position is available.

d. R4D employees and representatives may date and develop friendships and relationships with other employees — both inside and outside of the workplace — as long as the relationships do not have a negative impact on their work or the work of others.

e. Any R4D employee or representatives must disclose any romantic or sexual relationship with an adult associated with R4D programs/services to ensure that it is not exploitative.

f. Behaviors arising out of personal relationships that have an adverse effect on the workplace or culture will not be tolerated.

6.0 Attestation and Training

R4D requires employees to complete annual compliance attestation acknowledging that they understand and will follow the Safeguarding Policy. Suppliers will complete an attestation as a part of the contracting process. Employees or suppliers whose attestation is not up to date will be restricted from selected work activities, including but not limited to prohibition from working with children or vulnerable adults. While due diligence checks are undertaken for everyone involved with R4D, some individuals will be expected to undergo more in-depth safeguarding background checks as well, in accordance with donor requirements or local laws.

Declaration of policy acceptance.

This Policy forms part of the terms and conditions of any employment, contract or engagement with R4D. R4D staff and representatives must consent to work under the conditions of this policy and sign a declaration of compliance.

Mandatory Training

All staff and representatives of R4D must read this policy and sign the declaration as part of their induction. All new staff and representatives must also participate in Safeguarding training and/or review training materials as part of their induction.

In addition to mandatory training during the onboarding process, training materials are available to employees, representatives and suppliers at any time to review and refresh their knowledge. Training will include information that all R4D staff and representatives must know to carry out their responsibilities and include:

1. How to detect and intervene to reduce harms associated with safeguarding and SEAH.
2. How to report any concern, suspicion or known incident.
3. How to respond to safeguarding or SEAH concerns.

7.0 Reporting

Reporting is an essential part of a well-functioning safeguarding policy and related procedures. This section describes WHAT and HOW to report; including procedures for reporting. All R4D employees, representatives and suppliers are required to report any safeguarding concern, allegation or known incident relating to the conduct of an R4D staff member or representative and any child or vulnerable adult who is not a representative of R4D.
If an employee reports an allegation against a staff member of an organization who is not associated with R4D (e.g. a representative, supplier, donor organization or a government partner) please seek advice through the R4D Whistleblower Reporting Mailbox at https://www.custominsight.com/box/?cb28796pskp. An R4D representative will support you to report a complaint using the appropriate organizational grievance or complaint procedures.

When any employee has a concern, suspicion or knows of a safeguarding incident, they are required to report the incident to a Safeguarding Officer, Human Resources team or through the Whistleblower Reporting Mailbox.

Our standard reporting procedure follows the **R.E.A.C.T.** model:

1. **Report** concerns, allegations or known incidents are made within 24 hours.
2. **Evaluate** the reported concern, identify any immediate steps required, and triage the concern to ensure proper and swift follow-up.
3. **Act** — specifically make determinations about remedial actions and ensure investigations are timely initiated with proper notifications, as required.
4. **Care,** delivering any necessary assistance promptly to any individual impacted by the alleged misconduct.
5. **Trigger** corrective action to mitigate and prevent future harm of a similar nature. Use thorough procedures to ensure proper measures, responses, and actions have been taken.

**What to Report**

Report anything you have witnessed or heard about that could be construed as a policy breach as soon as possible. Report any signs that indicate something is wrong – indicators of abuse, change in behaviors, avoiding a staff member or partner, etc. even if you are not sure R4D has been involved.

Report any signs or concerns that an employee, supplier or representative may pose a risk to children or vulnerable adults or others.

There are no penalties for reporting concerns in good faith. You should report allegations you have heard, anything you have witnessed, or concerning behavior. These include if:

- You witness or suspect abuse, exploitation, harassment by R4D employees, suppliers or representatives.
- A colleague is not following the policy or procedures (e.g., they did not do research in pairs).
- Someone is vulnerable to abuse, exploitation, harassment, or where a colleague is committing abuse, exploitation or harassment involving a child or vulnerable adult.
- You witness or suspect abuse, exploitation, harassment by anyone else associated with the implementation of R4D’s work (e.g. donors, partners, community members).

If you believe that other aspects of this policy and procedure document, such as criminal record checks not being complete or non-reporting of incidents have happened, you should also let the Designated Safeguarding Officer know, so they can investigate, as appropriate.

**How to Report**

**Official Whistleblower Anonymous Reporting Mechanisms**

Whistleblower concerns may be reported to your manager, next level-manager, Director Human Resources and/or Chief Human Capital Officer — or they may be submitted through the Whistleblower Reporting Mailbox, which is 100% anonymous (Note: No information about the Whistleblower is collected or passed on to R4D and is administered by Custom Insight, a 3rd party platform. This includes, but is not limited to email, IP addresses, location, etc.). R4D encourages employees (or anyone) to raise their serious concerns through this formal channel so that R4D can investigate and address and correct inappropriate conduct and actions. All reports will be promptly investigated and appropriate corrective action will be taken, if warranted by the investigation.
Anonymous General Staff Feedback

In addition, we have also added another avenue for staff to anonymously submit concerns or suggestions through a less formal channel: The R4D General Feedback Mailbox. R4Ders can submit their concerns or suggestions (positive or negative) on any topic at any time to help us continue to make R4D a great place to work!

Partner and Community Reporting Channels

Partners are responsible for establishing reporting channels for implemented projects and programs. All reports on R4D projects must be reported to R4D HR team members or escalated to the Whistleblower Reporting Mailbox within 24 hours. The Whistleblower Reporting Mailbox is broadly accessible to R4D staff, representatives, partners and community members.

Protection Against Retaliation

No matter the outcome of the report, there is zero tolerance for retaliation against anyone who reports a concern or who participates in any subsequent investigation. Retaliation can take many forms. If you believe that you have experienced it, please report this via the reporting channel provided above or contact HR (hr@r4d.org).

8.0 Response

R4D believes in a survivor-centered, trauma-informed consultative approach to all reported concerns. At the time a report is received, it will be reviewed to ensure the person(s) impacted (e.g., victim or survivor) has received any immediate care needed. As part of the consultative process, R4D will refer the survivor to supportive services via the local PSEA Network or other community-based services accessible to ensure the necessary medical, psycho-social, legal, safety and other care is delivered swiftly and in line with the individual’s needs.

R4D has developed investigation procedures to ensure equity, consistency and efficiency when responding to reported concern. Only designated investigators will be engaged to conduct investigation into serious safeguarding concerns, including SEAH. We are committed to reviewing all concerns and allegations with care to identify a response pathway; including whether an investigation is warranted. Our decision-making procedures follow a step-wise approach to consistent reporting, evaluation, action taken, care delivered, and trigger corrective action.

Upon receipt of a reported concern, R4D will assess any corrective actions (e.g., suspension of alleged responsible person, alternative duties, etc.) necessary to ensure that children, vulnerable adults and/or staff are safe from any harm while the investigation is underway. The evaluation will determine if a formal investigation is warranted. A formal investigation will follow specific steps to collect facts and evidence that may be used to support personnel and disciplinary action, if necessary.

When concerns arise related to R4D Suppliers, R4D requires that the organization confer with R4D to ensure the adequacy of investigation procedures, the engagement of a trained investigator, and ensure two-way communication of planning and corrective action processes. Supplier entities will be responsible to share final report and any evaluation, investigation, or disciplinary action taken to ensure that such decisions align with R4D policies.

9.0 Definitions (in order alphabetically)

**Adult/Vulnerable Adult:** Adults are all those above the age of 18. Examples of adults considered “vulnerable” include (but are not limited) to:

- People with mental health problems, including substance abuse;
- People with serious medical conditions;
- People with disabilities, particularly those with intellectual impairments;
- Women facing marginalization because of their gender and cultural norm;
• Migrants, asylum seekers, refugees (economic and political) and victims of environmental disasters;
• People belonging to minorities who face persecution;
• People of dissenting political opinion, including those with religious and radical beliefs;
• People who face social stigma due to their profession, health status, sexual orientation, or experiences such as sex workers, individuals who are HIV-positive, LGBTQ people, and survivors of sexual violence and other violence;
• Individuals receiving or benefiting from a humanitarian or development project; and/or
• A junior member of staff or a volunteer who could become vulnerable where power and opportunity collide.

Bullying: Bullying is the inappropriate use of power by an individual or group, with intent to injure either physically or emotionally. It is usually deliberate and repetitive. The bullying may be physical or psychological (verbal and non-verbal).
  • Physically, bullying includes pushing, hitting, punching, kicking or any other action causing hurt or injury.
  • Verbal bullying includes insults, taunts, threats and ridicules.
  • Psychological bullying includes physical intimidation and ostracism.

Child and Young Person: A child or young person is regarded to be any person under the age of 18 years.

Child Abuse: Abuse happens to male and female children of all ages, ethnicity and social backgrounds, abilities, sexual orientation, religious beliefs and political persuasion. Child abuse includes physical, sexual, verbal, and emotional harm, neglect, bullying, child labor and domestic violence. Both boys and girls can be the victims of abuse, and abuse can be inflicted on a child by both men and women, as well as by young people themselves. In some cases, professionals and other adults working with children in a position of trust also abuse children.

Duty of Care: Duty of Care is a common law concept that refers to the responsibility of the organization to provide children with an adequate level of protection against harm. It is the duty of the organization to protect children from all reasonably foreseeable risk of injury.

Emotional Abuse: Harm to a person’s – child and adult alike - emotional, intellectual, mental or psychological development or well-being. It can be an isolated event or a repeated pattern. Emotional abuse includes but is not limited to any humiliating or degrading treatment (e.g., name-calling; threats; yelling; constant criticism; belittling; shaming; etc.). For persons in a role of care or responsibility for a child or adult, emotional abuse is the failure to meet the person’s emotional needs, usually through rejection, ignoring their needs, isolating them or other means of control.

Exploitation: The actual or attempted abuse of a position of vulnerability, power differential, or trust for the benefit of the individual leveraging their position, power, privilege, or wealth (through enticement, manipulation, coercion or trickery) to engage a child or adult in labor, domestic servitude, forced criminality, or other illegal acts. Typically, the person(s) exploiting a child or adult does so in order to profit monetarily, socially, or politically.

Fraternization: A dating or romantic relationships between a supervisor and an employee within the direct chain of command of that supervisor, or between two employees with the same supervisor.

Neglect of Safeguarding Protections: The failure to meet a child’s or adult’s basic physical and/or psychological needs either deliberately or through negligence. In terms of neglect as it relates to safeguarding, it may include failing to prevent harm; failing to ensure adequate supervision or observe the two-staff rule; or failing to provide a safe physical environment (e.g., exposure to violence, unsafe programming location, unsafe sleeping practices, access to weapons or harmful objects at programming sites, failing to ensure online activities are safe, etc.).

Physical Abuse: The non-accidental use of physical force that may intentionally or inadvertently injure a person, including children and adults. This may take the form of slapping, punching, shaking, kicking, burning, choking, shoving, restraining, or grabbing. The injury may take the form of bruises, cuts, burns, bruises, or fractures.
Safeguarding: The responsibilities and activities undertaken pursuant to industry standard and best practice to prevent or stop children and vulnerable adults from being exploited, abused or harassed. In short, safeguarding is the process by which R4D ensures it is a safe organization for the children and vulnerable adults with whom it engages.

Sexual Abuse: This occurs when a child or young person is engaged in sexual activity by an older child, adolescent or adult for their own sexual stimulation and gratification. Any sexual activity with a Child or Young Person is considered sexual abuse, regardless of the age of majority or age of local consent. Sexual abuse can be contact or non-contact acts, including threats and exposure to pornography.

Sexual Exploitation: 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. Children, young persons, and adults may experience sexual exploitation in person or online (e.g., via virtual or other non-contact methods). The sexual exploitation of children, young persons, and adults may also constitute a criminal offense, depending upon the age of consent, local laws and customs.

Sexual harassment: Sexual harassment is a particular form of harassment. It refers to unwelcome behavior related to sex that is personally offensive and fails to respect the rights of others, and therefore interferes with a productive professional work environment. Sexual harassment occurs when:

- Participation in such conduct is made, explicitly or implicitly, a term or condition of an individual’s employment.
- Participation in or rejection of such conduct is used as a basis for employment decisions affecting the individual.
- Such conduct has the purpose or effect of interfering with an individual’s work performance or creating an intimidating, hostile or offensive work environment.