

Safeguarding Against Exploitation, Sexual Abuse, Child Abuse and Child Neglect Guidelines

Purpose

This document describes IIE's commitment to prevent Exploitation, Sexual Abuse, Child Abuse and Child Neglect (“Guidelines”). This document expands on [IIE’s Worldwide Code of Conduct](#) (“Code”) and complements IIE’s Combatting Trafficking in Persons and Safeguarding Against Exploitation, Sexual Abuse, Child Abuse, and Child Neglect Compliance Plan. This document not only describes IIE’s safeguarding commitments, but also informs IIE Covered Individuals of their safeguarding responsibilities.

Scope

This document applies to all IIE employees, interns, volunteers, trustees, and representatives, as well as IIE contractors, suppliers, consultants, sub-contractors, sub-recipients and their employees, and representatives engaged by IIE, working for IIE or on IIE’s behalf in any capacity, including for the performance of programs sponsored by the U.S. federal government, foreign governments, corporations, and foundations (“**Covered Individuals**”).

Definitions and Acronyms:

Term	Definition
International Institute of Education, Inc.	“IIE” or “our” or “we” or “us”
Child, Children, Minor or Minors	Anyone under the age of 18 regardless of the age of majority or age of consent in the local context or country.
Child Abuse	Emotional, physical, sexual, or any other ill-treatment carried out against a child by an adult.
Child Neglect	The failure to meet a child’s basic physical and/or psychological needs either intentionally or through carelessness within activities supported by IIE that are responsible for the care of a child in the absence of the child’s parent, guardian, or caregiver.
Emotional Child Abuse or Ill Treatment	Injury to a child’s emotional, intellectual, mental, or psychological development caused by acts, threats of acts or coercive tactics.
Exploitation	Any 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). When carried out for a sexual purpose this constitutes sexual exploitation.

Term	Definition
Physical Child Abuse	Acts or failures to act resulting in unintended or deliberate injury (not necessarily visible), or unnecessary or unjustified pain or suffering which causes injury, harm, or risk of harm to a child’s health or welfare, or death.
Prohibited Activities	Child Abuse, Child Neglect, Emotional Abuse or Ill Treatment, Exploitation, Physical Child Abuse, Sexual Abuse, and/or Sexual Exploitation and Abuse, as defined in this Policy.
Safeguarding	Protecting people’s physical and mental health, wellbeing and human rights, and enabling them to live free from harm, abuse, and harassment.
Sexual Abuse	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. All sexual activity with a child is sexual abuse.
Sexual Exploitation and Abuse (SEA)	A form of sexual harassment that explicitly involves a power dynamic between the perpetrator and the target; when there is a potential threat/harm if an individual does not consent, or if there is a potential benefit to consenting.

Our Commitment and Shared Responsibilities

IIE has a zero-tolerance approach to any form of Prohibited Activities by any Covered Individual with access to or contact with program beneficiaries. IIE strictly prohibits all Covered Individuals from engaging in any form of Prohibited Activities with program beneficiaries. All Covered Individuals must fully comply with local and international child welfare legislation and U.S. child protection laws, or international standards, whichever affords greater protection.

IIE is also committed to transparency in our approach to prevent and respond to any safeguarding violations within our organization or with third parties, consistent with our federal and international disclosure obligations, and to the extent applicable comply with the standards, laws, statutes, regulations and codes, including:

- UN Inter-Agency Standing Committee’s Six Core Principles Relating to Sexual Exploitation and Abuse (IASC Six Core Principles);
- Keeping Children Safe Standards, available at <https://www.keepingchildrensafe.global/accountability/>;
- US Trafficking Victims Protection Act 2000, and
- International Labor Standards on Child Labor and Forced Labor.

Implementation – Awareness, Prevention, Reporting, and Responding

IIE is committed to preventing Prohibited Activities, by creating an environment where any issue or concern regarding the protection and safety of beneficiaries is reported and addressed appropriately and timely. IIE is committed to safeguarding program beneficiaries through the following means:

Awareness: Provide information so that all Covered Individuals are aware of the guidelines in this document, their responsibilities towards the safeguarding of program beneficiaries, and the ways they can report their concerns.

For IIE employees (including temporary employees, interns), volunteers and members of the Board of Trustees and Officers, the IIE Worldwide Code of Conduct contains principles, guidelines, and requirements that reflect the highest ethical standards. The Code informs IIE employees of the U.S. Government's and IIE's commitment to safeguarding against Prohibited Activities outlined in these Guidelines. Upon beginning work with IIE, all new IIE employees are required to read and sign the IIE's Worldwide Code of Conduct. IIE employees are also required to read and certify their compliance with the Code of Conduct annually.

Prevention: Minimize the risks of any form of Prohibited Activities by Covered Individuals, through awareness and prevention activities, including, but not limited to conducting relevant vetting and background checks.

For IIE employees, IIE provides periodic mandatory training in Ethics and Compliance. In addition, IIE holds periodic training activities with IIE employees in IIE's regional and international offices in order to review the requirements of specific awards, including safeguarding against Prohibited Activities.

Reporting: Provide information so that all Covered Individuals are aware of how to report suspicions or concerns regarding potential allegations of Prohibited Activities.

Covered Individuals are required to immediately report any instances of suspected Prohibited Activities involving program beneficiaries served by IIE programs or with whom Covered Individuals come in contact during the implementation of those programs.

[IIE's Worldwide Code of Conduct](#) requires IIE employees to promptly report all violations of the Code, including any known or suspected cases of Prohibited Activities. It contains procedures for raising compliance questions, concerns, and violations without fear of retaliation including through an anonymous hotline. For more information, please see Code of Conduct Section 8. Raising Questions and Reporting Violations.

IIE requires all IIE employees to report known or suspected cases involving Prohibited Activities to their immediate managers, Grants and Contracts, Human Resources, or the Legal Department, or through the hotline if an IIE employee prefers to report anonymously. IIE requires all Covered Individuals who are not IIE employees to report known or suspected cases of Prohibited Activities to the point of contact as

listed in the terms and condition of their award/contract or alternatively by emailing confidentialreport@iie.org.

Upon receipt of credible information of any known or suspected cases involving Prohibited Activities, IIE will report the matter to the respective sponsor, appropriate agency or entity as applicable, in a timely manner and cooperate in any investigation. A violation of these Guidelines or of the Code of Conduct may result in disciplinary action, including termination of employment, contract or Board membership, and, where appropriate, reporting to relevant government officials.

Responding: IIE commits to take appropriate and prompt action to address all reports of Prohibited Activities, to help safeguard the safety and well-being of the program beneficiaries involved.

Non-Retaliation

Covered Individuals are reminded that IIE prohibits any form of retaliation against any individual for making a good faith complaint or providing information about suspected conduct that violates applicable law, IIE's Worldwide Code of Conduct, or any IIE policy. If a Covered Individual believes that they have been retaliated against in violation of IIE's Worldwide Code of Conduct, that person should report the violation immediately to their Supervisor, Grants and Contracts, Human Resources or the Legal Department, or through the hotline.

Violations of the principles found in these Guidelines, IIE's Worldwide Code of Conduct or IIE's U.S. Employment Handbook or the applicable country specific HR Guides ("HR Guides") may lead to serious consequences up to and including termination of employment, contract or Board membership, and, where appropriate, reporting to relevant government officials.

Investigation and Remedies

IIE will promptly investigate all reports or complaints of Prohibited Activities in accordance with the processes set out in IIE's U.S. Employment Handbook or the applicable HR Guides.

In investigating and responding to the alleged violations, IIE will take a "survivor-centered approach". Such an approach ensures the survivor's dignity, experiences, considerations, needs, and resiliencies are placed at the center of the process¹.

IIE will investigate all reports of suspected Prohibited Activities in a confidential and timely manner and take appropriate action, including but not limited to notifying, as applicable, local law enforcement, social services or child protection authorities, so long as such notification does not put the child or vulnerable adult at risk of further harm. Responding to alleged violations involving children requires taking into consideration a "best interest of the child determination". This determination considers the

¹ IASC Definition & Principles of a Victim / Survivor Centered Approach
<https://interagencystandingcommittee.org/iasc-champion-protection-sexual-exploitation-and-abuse-and-sexual-harassment/iasc-definition-principles-victim-survivor-centered-approach-0>

best possible outcome for a vulnerable child who has been exposed to violence, abuse, exploitation, or neglect.

Any complaint of abuse made by a program beneficiary, including children, will be promptly investigated by IIE regardless of whether or not the allegations have been verified.

Pursuant to an investigation by IIE, any employee (including temporary employee or intern), volunteer or trustee found to have engaged in any form of Prohibited Activities will be dismissed immediately from further engagement with IIE. Any person providing services pursuant to a contract with IIE found to have engaged in any form of Prohibited Activities will have their contract with IIE terminated immediately. Based on the nature of alleged violations and its findings, IIE may be required to report credible allegations to law enforcement agencies.

Implementation - Child Safeguarding

IIE is committed to safeguarding children, which is the process of preventing and protecting children from intentional or unintentional acts that lead to the risk of or actual harm by IIE Covered Individuals, who are provided access or contact with children through IIE's program implementation and operations. This includes IIE's direct program implementation, work through third parties and management of children's personal data. The following are examples of prohibited behavior and practice, which are not tolerated by IIE, and best practices in safeguarding children:

1. IIE strictly prohibits any sexual activity with an individual under the age of 18, regardless of the legal age of consent / majority within the state or country in which the child lives, and/or the location where the offense occurs. In locations where a child cannot legally give informed consent to sexual activity, such activity with or without their consent will be treated as a serious infraction and will result in disciplinary action being taken, including termination, and the pursuit of other available legal remedies. Occurrences of "consensual" sexual activity with a child over the legal age of consent within the state or country in which the child lives and/or where the offense occurs, but below 18 years old, will be treated as an act of sexual exploitation & abuse. This is a serious infraction and will result in disciplinary action being taken, including termination, and the pursuit of other available legal remedies.
2. Two-adult rule: During activities or service where children are involved, two or more adults should be involved to supervise the activity, whenever feasible.
3. No child shall be alone with a Covered Individual (in-person or virtual), unless absolutely necessary and with parental/legal guardian and supervisor consent. Where one-to-one interactions are absolutely necessary, interactions should be held in a public area, in a room where the interaction may be observed or in a room with the door open.
4. No Covered Individual may stay alone overnight with a child program beneficiary at any location.
5. Communication outside the role of a professional or volunteer relationship is strictly prohibited. Covered Individuals who use any form of electronic communications to communicate with

Children may only do so for activities involving IIE business and to the extent possible and applicable, should use an IIE address or site.

6. No Covered Individual may discriminate against, exclude, or favor a particular child.
7. All program design processes for which IIE engagement with a minor is possible will include assessment and integration of applicable child safeguarding risk mitigation measures.
8. IIE agreements (sub-award, consultant agreement, contractor agreement) with another entity will include language on minimum child safeguarding standards to ensure compliance with the requirements in this document, when applicable.
9. Engagement with children and their parent/guardian for the purposes of advertising, program promotion, publicity, marketing, education, information and trade materials must be done with assent and informed consent and must not exploit the child or guardian, nor increase their vulnerability or place them at risk. Child participation in IIE programs will not be limited or restricted irrespective of the child's assent or their parent/guardian's consent to the use of the material for advertising, marketing, or program promotion.

Implementation – Safeguarding Program Beneficiaries

IIE is committed to safeguarding program beneficiaries. This includes IIE's direct program implementation, work through third parties and management of personal data. The following are examples of prohibited behavior and practices, which are not tolerated by IIE, and best practices in safeguarding:

1. IIE strictly prohibits any sexual or romantic relations between Covered Individuals and program beneficiaries (of any age).
2. IIE strictly prohibits any abuse of program beneficiaries, including, but not limited to, physical, sexual, psychological, financial, discrimination, and neglect.
3. IIE strictly prohibits any form of coercion of program beneficiaries.
4. IIE strictly prohibits any sexual exploitation and abuse (SEA) of program beneficiaries. SEA can happen in any setting, in-person or virtual. As listed in [U.S. Employment Handbook](#), some of the examples of SEA include (but are not limited to):
 - Making inappropriate or derogatory remarks, jokes, or comments, especially those about someone's appearance, body, style, etc. whether in person or via email, text message, or on social media.
 - Making vulgar or inappropriate gestures.
 - Sending unwanted sexual advances in person or via email, text message, or on social media.
 - Displaying or sending sexually suggesting, pornographic material, cartoons, or graphics on computers, emails, cellphones, etc.
 - Unwelcome and/or inappropriate touching, including sexual assault.
 - Physical contact in a sexual manner by force or coercion.

- Quid pro quo situations, where preferential treatment in employment, promotions, payment, acceptance in IIE's programs etc. are offered in exchange for accepting sexual advances.
- Threats that a person accepts sexual advances as a condition to continue participation in IIE's run programs or to avoid loss of benefits.

Agreements with Third Parties, Agents, Subawardees and Subcontractors

- Flow-down of Prohibited Activity Requirements

IIE requires subawardee and subcontractor awareness of and compliance with Prohibited Activity requirements by including the applicable provisions in their agreements, whenever required by US laws and regulations or other sponsor requirements.

- Subawardee and Subcontractor Monitoring and Management

IIE has a robust subawardee and subcontractor monitoring and management program. IIE employees who engage third parties as suppliers, consultants, independent contractors, or vendors must use reasonable care to engage third parties who will act in a manner consistent with IIE's principles. Responsibility determinations or pre-award questionnaires (risk assessments) are conducted for all subawardees and programmatic contractors under USG contracts, cooperative agreements, and grants. Based on the results of the risk assessment, IIE may require special award conditions, monitoring, and audit plans for the subawardee or programmatic contractors under USG contracts. The appropriate regulations related to the USG agency and award type must be flowed-down to all subawardees and subcontractors.

APPENDIX

A. Internal and External References

[IIE's Worldwide Code of Conduct](#)

[IIE Privacy Statement](#)

[NYC Stop Sexual Harassment Act Notice](#)

[IIE's U.S. Employment Handbook](#)

[IIE's Combating Trafficking in Persons Plan](#)

[UN's Inter-Agency Standing Committee \(IASC\) Six Core Principles](#)

[UN's Inter-Agency Standing Committee \(IASC\) Definition & Principles of a Victim/Survivor Centered Approach](#)