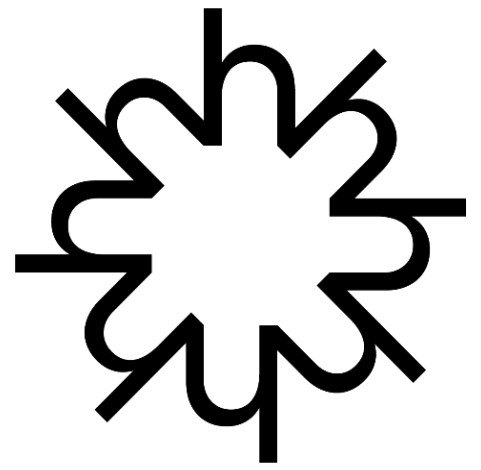


Safeguarding Policy

2022-2030



horizont 3000



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20.09.2024	Version 1.0: Approved by horizont3000 Board
20.02.2025	Version 1.1: Update
Next review: 2026	horizont3000 - Austrian Organisation for Development Cooperation, Wilhelminenstraße 9/II f, 1160 Wien, Austria

Abbreviations

ADA	Austrian Development Agency
CMT	Case Management Team
CoC	Code of Conduct
DMB	Decision Making Body
ECPAT	End Child Prostitution and Trafficking
EU	European Union
h3	horizont3000
MO(s)	Member Organisation(s)
PSEAH	Protection from Sexual Exploitation, Abuse and Harassment
RCO(s)	Regional and Country Office(s)
SEAH	Sexual Exploitation, Abuse and Harassment
SoC	Subject of Complaint
UN	United Nations

1. Introduction

It is well known and documented, that international programmes can result in unintended or even intended negative consequences to those populations that involve themselves/attend projects and programmes, also including those of horizont3000. Hence it is our responsibility to do the utmost to prevent all forms of violence, sexual exploitation, abuse, harassment (SEAH), neglect and bullying and to protect all persons coming into contact with us, especially disadvantaged individuals and groups.

Similarly, staff and associated personnel may themselves experience harm (as described above) in the workplace by colleagues (including partner organisations) and by children and adults attending projects and programmes.ⁱ These facts make a safeguarding policy absolutely necessary. We believe that the implementation and use of this policy and annexes will foster the organisational culture and accountability in creating and maintaining a safe and supportive organisation so that children and vulnerable adults are protected in their rights.

Definition: Safeguarding is about keeping persons safe from and addressing harm that has been caused by the organisation's staff and/or associated personnel misusing their power. It is a compilation of policies, procedures as well as practises to prevent and protect children, vulnerable adults and staff from harm, resulting from coming into contact with projects, programmes or persons of an organisation.ⁱⁱ

ⁱ Adapted from the Safeguarding Resource & Support Hub (<https://safeguardingsupporthub.org/what-safeguarding>)

ⁱⁱ Adapted from BOND (<https://www.bond.org.uk/resources-support/safeguarding/safeguarding-resources/>) and Keeping Children Safe (<https://www.keepingchildrensafe.global>)

1.1 Safeguarding Policy within the Framework

Within the Policy Framework of horizont3000, the Gender Equality Policy belongs to the category of cross-cutting policies, which are integrated and mainstreamed throughout the horizont3000 strategy and all subsequent policies and strategies:

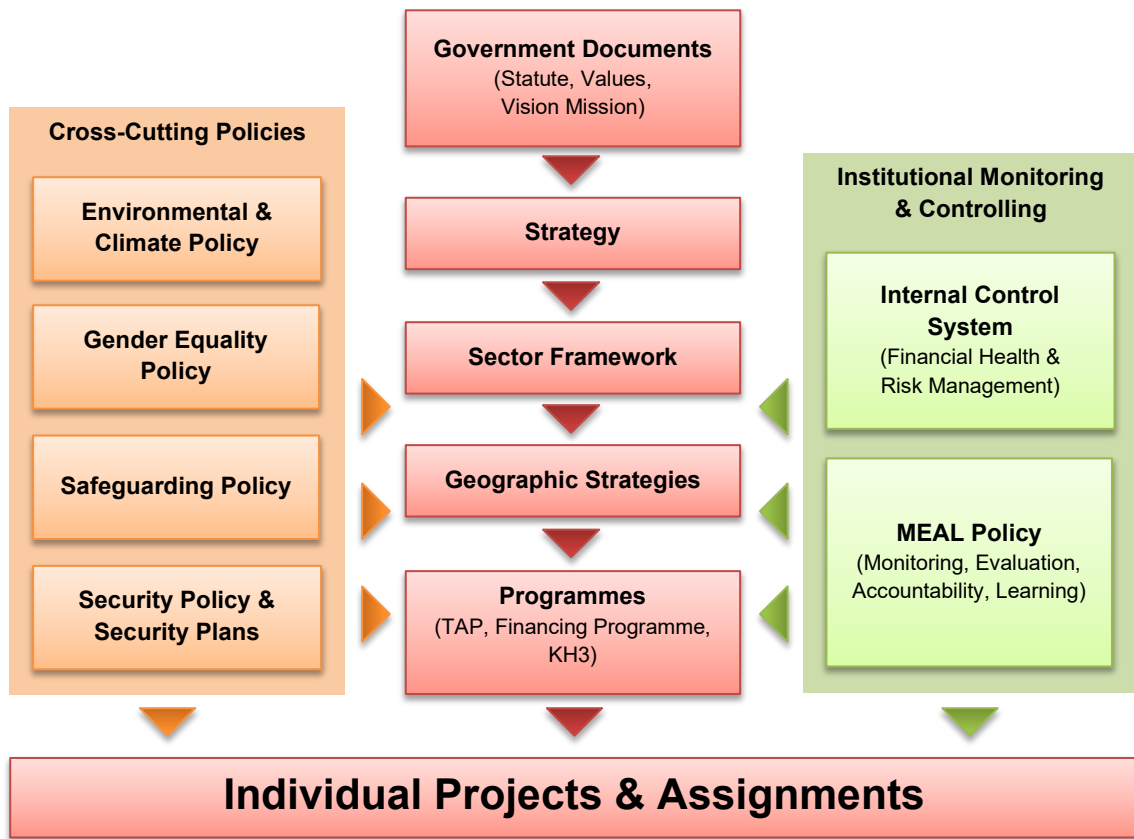


Fig. 1. Policy Framework of horizont3000

1.2 Origins, Development Process and Acknowledgement

Origins

This policy has its origins in the Child Safeguarding Policy of 21 May 2021, valid for h3's advisors (previously Technical Advisors). As a result of the further development on safeguarding within h3, this first safeguarding policy comes into force introducing a wider scope, which additionally includes vulnerable adults and staff. Protection from sexual exploitation, abuse and harassment, neglect and bullying are taken over from the child safeguarding policy and adapted to all target groups. It consequently replaces and subsumes the former child safeguarding policy. Nevertheless, h3 will of course emphasise the specific vulnerabilities and hence the need for special protection of children.

Development Process

After the elaboration of a first draft of the safeguarding policy mid of 2022, an expert from ECPAT and two h3 advisors with safeguarding expertise reviewed the policy and the Code of Conduct (CoC). Their feedback was included and then a participatory process was installed to involve horizont3000 staff (programme coordination, gender focal point, the works council, programme coordinators, communications, data protection, international legal issues, advisors), safeguarding experts from two Member Organisations, Dreikönigsaktion (DKA) and Caritas and an expert from the Austrian Development Agency (ADA). This sounding board, consisting of representatives of each of these stakeholders provided feedback on the different stages of the document (see Fig. 2.). The second draft was worked out thereafter including their remarks. The third and final draft was reviewed by the managing director and thereafter submitted for approval to the horizont3000 board. After their approval with requested changes the feedback of the regional director East Africa was taken up. The general meeting officially acknowledged the policy in June 2023.

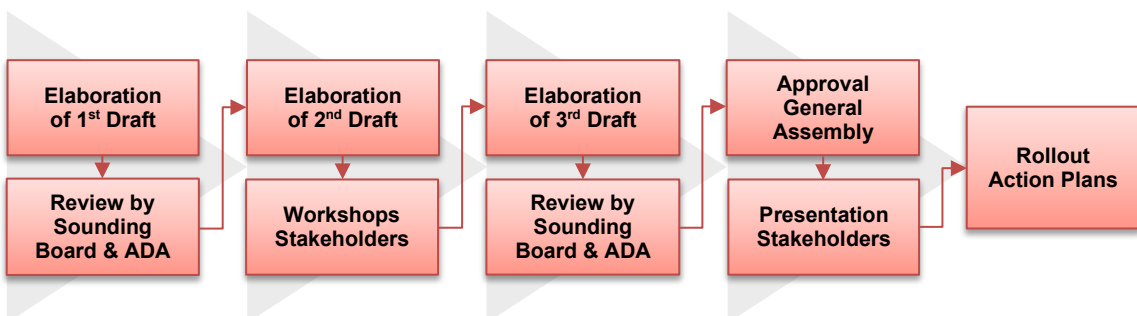


Fig. 2. Process of development of the Safeguarding Policy; Sounding board: From horizont3000: min. 2 programme coordinators, 1 gender focal person, 1 works council, 1 international legal responsible, 1 data protection responsible, 1 communications, 5 advisors, 2 management team, 1 RCO director; from member organisations: 2 experts; from ADA: 1 expert

Acknowledgement

This policy and annexes have been inspired by and drawn from a range of sources, among others (as outlined in the annex “Sources” safeguarding documents and trainings produced by BOND United Kingdom and their branches in different countries, Caritas, Core Humanitarian Standard (CHS) Alliance, Evangelisches Werk für Diakonie und Entwicklung, Dreikönigsaktion (DKA), ECPAT Austria and international, Keeping Children Safe, the Safeguarding Resource and Support Hub (RSH) and Save the Children Deutschland E.V.. Additionally, h3 colleagues in different positions and countries contributed with their highly valuable expertise and feedback to the development of the safeguarding policy and annexes.

1.3 Aim

The aim of this safeguarding policy is to regulate how we as an organisation protect children, vulnerable adults and staff, regardless of their personal status/characteristic (e.g., age, origin, ethnicity, socio economic status, religion/religious believes, gender identity, sexual orientation, disabilities), from harm and the violation of their rights that may be caused through coming into contact with h3. Moreover, this policy supports the protection of h3 from complicity and all potential wrongdoers from unfounded accusations. It applies both in Austria and abroad.

This policy lays out the commitments made by horizont3000, and describes procedures and conduct for:

- the conduct of horizont3000 staff in Austria and abroad including advisors
- the conduct of personnel associated with horizont3000 whilst engaged with its work
- the design and implementation of horizont3000’s programmes and activities in collaboration with member and partner organisations

Additionally, to the above, the following groups of persons and organisations are informed about the policy:

- donors
- partner organisations (for detailed information on the standards of cooperation concerning safeguarding see chapter 6)
- member organisations

Staff in management functionsⁱⁱⁱ ensures that the contents of this safeguarding policy and the respective annexes are made known to all their directly assigned personnel, that they are understood and put into practice in the respective work area, and that compliance is regularly checked. They have a particular responsibility to promote, develop and maintain a safe working environment and to act as role models.

This safeguarding policy aims to be comprehensive. It has been prepared with great care, however given the diverse settings in which horizont3000 is working, it does not claim to be account for every eventuality/ all-embracing. It is likely that situations may occur which are not covered, or questions arise, where the answer cannot be found in the policy or annexes. In such

ⁱⁱⁱ Mainly the following: managing director, unit management, team leaders, regional- and country directors

cases the safeguarding officers in the Regional and Country Offices (RCOs) and/or the safeguarding officer Austria should be contacted for further consultation.

This policy does not cover:

- Safeguarding the environment – this is dealt with under horizont3000's Environmental and Climate Policy
- Anti-Corruption – this is dealt with under horizont3000's Anti-Corruption Policy/ Guidelines
- Safety and Security for staff – this is dealt with under horizont3000's Safety & Security Policy
- Safeguarding Data/ IT Security and Data Protection – this is dealt with under horizont3000's IT- and Data Protection Policy
- Safeguarding in Public Relations – this is dealt with under horizont3000's Public Relations Guidelines
- Safeguarding incidents involving member organisations or donors in projects and programmes not funded, implemented or supported by horizont3000. If such incidents are reported to h3 they are forwarded to the respective contact points of the member organisation or donor for further processing. However, h3 has to be informed about any safeguarding incident involving horizont3000's staff or associated personnel.^{iv}
- Safeguarding concerns in the wider community not perpetrated by h3, associated personnel, member organisation or partner organisations. However, as a non-governmental organisation (NGO), we have a duty of care to act responsibly on reports and therefore make referrals to professional social service providers, medical services, the safeguarding team (if safe to do so) if an NGO is involved, or the police and local authorities for criminal cases or possible criminal cases (if safe to do so).

1.4 Governance and Accountability

1.4.1 Review

horizont3000 will review this policy and related relevant documents at least once every two years, in order to meet with changes in applicable legislation, national and international safeguarding developments as well as research. Exceptionally, this policy will be reviewed one year after coming into force to monitor its practicality and enable any necessary timely changes.

The safeguarding policy is approved by the horizont3000 management team, the board and the general meeting. If major changes occur in the biennial review, the board and general meeting have to be informed and the document approved.

Additionally, this document is intended as a "living" document. Suggestions for improvements and updates are therefore welcome at any time.

^{iv} See chapter 5.3.3

1.4.2 Policy Adaptation

This safeguarding policy and annexes are global ones. If and where necessary, they can be contextualised by horizont3000 RCOs to better fit the respective legal and cultural context in the respective countries, but without attenuating it. Any adaptations or changes, besides language translations, have to be in consultation with the RCOs safeguarding officers and the safeguarding officer Austria, who will then facilitate further approvals with the management team and the board. After approval, such adaptations and addendums (e.g., continental, regional or country frameworks) are documented in the annex. A reference to this should be made directly in the text of the policy.

2. Reference Framework

The right of children and adults to protection from different forms of harm is enshrined at the international, regional and national level in various conventions and laws.

This policy is based on and related to international safeguarding standards (see below) and is extended by the legal provisions applicable in Austria and in the countries in which h3 implements projects and programmes and where advisors are on assignment, specifically in connection with violence, abuse, exploitation, neglect and bullying (see in chapter 8.2). In case horizont3000 safeguarding standards exceed safeguarding standards of national legislation, horizont3000 staff and associated personnel are always committed to comply with the former.

In most countries, criminal laws protect children and other disadvantaged groups and expose offenders to prosecution. Austrian citizens or foreigners living permanently in Austria who commit sexual assaults/ crimes against children outside of Austria, or pay minors for sexual services, can be prosecuted in Austria (“Extraterritoriality Principle”).^v Further legal frameworks are those legal systems applicable in the respective countries, where RCOs and advisors are placed. This is particularly important in the individual case and to assess in which country an offender should be prosecuted^{vi}.

^v See ECPAT: https://ecpat.org/wp-content/uploads/2021/08/EXSUM_A4A_EU_Austria.pdf, p 5

^{vi} Decision if offenders should be handed over to the national prosecution authorities or in case of European staff whether Austrian or the law of the country, the person is a citizen of, applies.

International Safeguarding Standards

- United Nations Secretary General's Bulletin on Prevention Sexual Abuse and Exploitation: [United National Secretary-General's Bulletin on Preventing Sexual Abuse and Exploitation](#)
- Interagency Standing Committee (IASC) Six Core Principles: [Inter-agency Standing Committee 6 Principles of PSEA](#) and [Minimum Operating Standards](#)
- The International Child Safeguarding Standards: [Keeping Children Safe](#)
- Core Humanitarian Standard: [Core Humanitarian Standard](#)
- Development Assistance Committee (DAC) Recommendation on Ending SEAH: [DAC Recommendation on Ending SEAH in Development Co-operation and Humanitarian Assistance: Key Pillars of Prevention and Response](#)

2.1 Scope

Safeguarding is everyone's responsibility!

Consequently, this policy applies to horizont3000 contracted staff in the office in Austria and in RCOs as well as associated personnel whilst engaged with work or visits to: the head office, RCOs, programmes and projects, partner organisations (including those where advisors are on assignment) related to h3.

Generally, h3 does not dictate the belief and value systems by which staff and associated personnel conduct their personal lives. However, this policy and annexes apply both, during and outside usual work hours. Actions taken by horizont3000 staff and associated personnel outside of working hours that are seen to contradict the code of conduct will be understood as a violation.

Our complaint mechanism follows up on reported concerns or complaints in cases where staff or associated personnel are directly involved, either as affected persons, victims/survivors, observers and reporters/complainants of concerns or incidents, persons of trust or as wrongdoers, Subject of Complaints (SoC). If a concern or complaint does not refer to behavior of horizont3000 staff or associated personnel, we fulfil our duty of care as an NGO to act appropriately and responsibly.^{vii}

All cooperation partners in programmes and projects horizont3000 are held accountable for, will be obliged to develop, implement and regularly review their own safeguarding policies that meet our standards^{viii}. For this reason, we inform member and partner organisations as well as donors about this safeguarding policy.

As a requirement for cooperation, partner organisations have to sign either an addendum as part of the partner organisation agreement or the partner organisation agreement including a paragraph about the common safeguarding standards, after legal checking. This clearly states

^{vii} For more details see chapter 5.3.3

^{viii} For more details see chapter 6

their commitment on safeguarding.^{ix} They will be properly informed about the policy and support will be arranged for the required standards and procedures.

Compliance and Sanctions

horizont3000 staff must comply with the policy, sign the Code of Conduct (CoC) (see annex “Code of Conduct”) and will be held accountable to it. A misconduct leads to a disciplinary process and the imposition of disciplinary measures (even leading to dismissal) and where relevant, appropriate legal or other such actions are taken.

Associated personnel sign and abide the “addendum for associated personnel”, in which the most important regulations and the code of conduct on safeguarding are included. This is a pre-condition of their involvement with h3 (as part of contracts).

The policy is also designed to ensure that concerns about wrongdoing or malpractice within h3 can be raised without fear of victimization, subsequent discrimination, disadvantage or dismissal.

If a concern raised or a reported complaint proves unfounded after investigation, no action will be taken against the reporting person. Nevertheless, in case of intentional false or malicious accusations proven after investigation, appropriate disciplinary actions might be taken.

^{ix} For more details see chapter 6

3. Responsibilities

3.1 All Staff and Associated Personnel

- All horizontal3000 staff and associated personnel are to be made aware of this policy and adhere to its requirements including the accompanying documents. They confirm this by signing the CoC. They commit and contribute to an environment where children, vulnerable adults and colleagues feel safe, respected and protected. They must never act in a way that results in violence or which places people at risk of violence.
- All staff are responsible for publicising and/or disseminating the contents of the safeguarding policy in accordance with their role and responsibilities.
- All staff and associated personnel are obliged to report safeguarding concerns and breaches of the policy, following the steps in the complaint mechanism (chapter 5.3.3), as we have an ethical, moral and legal responsibility to do so. **Individual staff members do not investigate any matter by themselves!**^x

^x See also the annex Code of Conduct

3.2 Management (and Deputies)

- The horizont3000 management team, all RCO directors and team leaders ensure the strategic further development of safeguarding within the organisation.
- The global senior management are responsible for compliance with, and roll out of this policy in general, in their areas of responsibilities and especially when approving new projects/programmes or establishing new collaborations with partner organisations.
- They are leading by example, act as positive role models and are accountable to do their utmost to develop and maintain a working environment which is safe from any harm, they prevent harm, allow open, honest and respectful dialogue and cooperation and do not abuse their power over others nor act in a way that results in harm or places people at risk of harm.
- They ensure that their assigned staff are familiar with the contents of this policy, have received training (initial, refresher and further trainings) corresponding to their role and responsibilities, and have signed the CoC. It is stored in the personnel file. Additionally, senior management should include safeguarding in the annual appraisal discussions.
- They commit themselves to regular further training in the field of safeguarding.
- RCO directors ensure that staff, associated personnel and partner organisations are informed about the horizont3000 policy, the CoC and the complaint mechanism.
- RCO directors ensure the necessary working environment for the safeguarding officers (if any).

3.3 Safeguarding Board Member

The horizont3000 board appoints a safeguarding board member for the period of two years. This person ensures oversight to safeguarding – so that appropriate policies and procedures are compliant with good practice guidance and legislation are in place. This board member may be involved in cases concerning the management team, cases with high impact on the entire organisation or cases which go public.

3.4 Managing Director (and Deputy)

The managing director bears the overall responsibility for the safeguarding management at horizont3000. In the superior function, the person controls the safeguarding management of the RCO directors (in terms of content), the safeguarding officer Austria (in terms of content). The managing director ensures quick and clear decisions in case of emergencies/incidents (case management). Important tasks are:

- ongoing monitoring of RCO directors and the safeguarding officer Austria in the function of overall responsible person for safeguarding
- member of the decision-making body

- ensures further development of safeguarding at horizont3000 in collaboration with the safeguarding officer Austria
- handover to deputy in case of planned absence

3.5 Safeguarding Officer Austria (Deputy)

The safeguarding officer Austria (deputy) is a designated co-worker of horizont3000 and with sufficient time resources for these tasks:

- acts as an ambassador for safeguarding and undertakes clear advocacy for it.
- is responsible for the elaboration, ongoing review and updating of this policy, its accompanying documents and processes.
- supports the further development of safeguarding as a cross-cutting issue in h3.
- is the contact person for the members of the management team about safeguarding in general and the roll-out of the policy.
- advises senior management in the further development of safeguarding.
- gives support and advice to safeguarding officers and encourages exchange.
- leads the case management team.
- coordinates the safeguarding working group.
- receives concerns and complaints for safeguarding, anti-corruption and data protection and distributes them to the responsible persons.
- is the responsible person/ contact point for receiving safeguarding concerns and complaints.
- is responsible for the process of case management their conclusion and learning according to the official complaint mechanism. This person is supported by the decision making body and the safeguarding systems provider in technical aspects.
- is responsible for the documentation of cases, supported by others (e.g., the deputy, safeguarding officers, external ombudsperson, systems provider).
- is responsible for the provision of reports to the board and management team, according to set standards of confidentiality.
- shares lessons learned organisation-wide through internal meetings and/or internal communication and trainings, according to set standards of confidentiality.
- advises and supports about trainings on safeguarding for staff; organisation of such on request.
- exchanges with national and international organisations on safeguarding.
- is actively involved and supports in organising sharing and learning events.
- supports communication and public relations upon request and in coordination with the managing director.
- participates in further training on safeguarding.
- can be assigned as deputy for safeguarding officers.

3.6 Safeguarding Officers Global

The safeguarding officers (and in their absence the deputies) are co-workers of horizont3000 and with sufficient time resources for these tasks:

- ↗ act as ambassadors for safeguarding and undertake clear advocacy for it.
- ↗ are responsible for the adequate adoption of this policy, accompanying documents and processes to the relevant countries where operating.
- ↗ support and advise the further development of safeguarding as a cross-cutting issue in the region/countries.
- ↗ are contact persons for the RCO director about safeguarding and the implementation of the policy.
- ↗ support the further development of safeguarding in the region/country.
- ↗ give support and advice to the safeguarding officer Austria and openly exchange with her/him.
- ↗ are possibly members of the case management team.
- ↗ are also points of contact for receiving concerns and complaints within the region/country, giving information and reference to the complaint/ case.
- ↗ provide reports to the h3 safeguarding officer Austria.
- ↗ share lessons learned in the region/country internal meetings and/or internal communication and trainings.
- ↗ advise on trainings on safeguarding for staff and organisation of such in the region/ countries.
- ↗ exchange with national and international organisations on safeguarding.
- ↗ are actively involved and support in organising sharing and learning events on safeguarding
- ↗ give support to Public Relations upon request and in coordination with the RCO director/ the managing director.
- ↗ participate in further training on safeguarding.
- ↗ support partners in the development of their safeguarding policies.

3.7 External Ombudsperson

- ↗ The external ombudsperson is an independent, neutral and confidential contact point for reporting concerns and complaints about all h3 activities and can be reached by anyone, anyone who does not wish to use the horizont3000 portal can submit a concern or complaint to the external ombudsperson. The external ombudsperson is required to provide reliable, secure and accessible means of contact. These means of contact are published at the horizont3000 website.
- ↗ Suspected cases and complaints can be brought to the external ombudsperson directly, even anonymously, and after consideration with the case management

team and the decision-making body, will either be forwarded for further processing to them or investigated by the external ombudsperson independently.

- Furthermore, the external ombudsperson can be consulted by the safeguarding officers and the decision-making body in difficult cases.
- If a concern or complaint involves persons from the case management team, the decision-making body, board members or general meeting as SoCs, the report must be submitted to the external ombudsperson. They will then take care of further case management and the appropriate composition of a counselling/investigation team.
- The external ombudsperson or the external contact point can be responsible for a complete case management until closure including documentation and learning.

3.8 Case Management Team

The case management team (CMT) of horizont3000 always consist of minimum two persons and the dual-control-principle has to be followed. The CMT is to provide expertise, consult on the complaint and case and make recommendations as part of the organisation's internal processing. Within this team every voice counts the same, regardless of the existing hierarchy in the organisation and shall try to get a balanced way of cooperation. Different perspectives and free thinking are considered as very helpful. The case management team is composed for each case, depending on the nature of the complaint/case. It is led by the safeguarding officer Austria (or deputy), additional members might be for instance one of the contact points the complaint was raised at or the team leader of the technical assistance programme. The responsible person for international legal issues should be involved if legal advice is necessary. Other persons (including external experts) can be added or consulted according to the individual case and depending on the required expertise, always on a need-to-know basis. Persons who are directly involved in the reported case or are otherwise biased can never be part of a case management team.

The case management team

- makes an initial assessment of the case after it has been reported to determine whether further investigations are necessary and advises the decision-making body on the steps that need to be taken immediately.
- conducts further internal investigations.
- if required, has contact with authorities (e.g., police, child and youth welfare services, etc.).
- compiles necessary documents to ensure that decisions and measures can be taken in an appropriately sound manner.
- prepares briefings, advice, recommendations, measures and steps for implementation to the decision-making body on the further course of action.
- prepares the documentation and review of the case as well as recommendations for possible adaptations of the policy and annexes.
- reflects and plans communication concerning the case
- decides together with the DMB on every case's access permission including the revoke of rights whenever needed.

3.9 Decision-Making Body

The decision-making body of horizont3000 consists of the members of the management team. It must consist of at least two persons, so that the dual-control principle is guaranteed. If legal advice is needed an expert on legal issues should be consulted.

In all cases, the decision-making body is immediately informed by the safeguarding officer Austria of a new complaint. The task is to carry out decision-making processes based on the groundwork and recommendations of the case management team and to ensure sustainable responses to identified risks and issues within the organisation. In case a member of the decision-making body is directly involved in the reported case, is the SoC or is otherwise biased, the person can never be part of a case management team.

The decision-making body

- makes joint decisions on the case and gives clear direction at critical points in the complaint process.
- decides on the necessity of further processing/ investigation.
- decides on measures that have to be implemented.
- ensures a fair, comprehensible and evidence-based process.
- ensures that reviews are undertaken and lessons learned are taken up for possible adaptations.
- communicates with relevant stakeholders, if necessary.
- supports media work when required.

3.10 Safeguarding Systems Provider

The safeguarding systems provider is responsible for provision and protection of IT systems employed in communication and storage of sensible data. Typically, this will be a ticketing system. The main responsibilities are:

- availability and accessibility of a suitable IT tools enabling (1) initial contact (2) case bound communication and (3) case management.
- procedures for opening, processing and closure of cases
- safety and confidentiality in data processing (unless required by law to break that confidentiality)
- protection of IT tools including effective measures to protect tools from unauthorized usage by skilled H3 staff and IT personnel.

3.11 Person responsible for International Legal Issues

- The person responsible for international legal issues gives advice to the head of programmes, the case management team, the decision-making body and the safeguarding officer Austria and global on legal questions upon request.

3.12 Safeguarding Working Group^{xi}

The safeguarding working group of horizont3000 consists of the head of programmes, the safeguarding officer Austria, the safeguarding officers global, programme coordinators and a representative of the works council. Additionally, other staff can be asked to join the group according to specific requests and to their expertise, e.g., gender focal points, advisors. The safeguarding officer Austria is responsible for the coordination of the group.

- The safeguarding working group is dedicated to roll-out and monitor the implementation of this policy and procedures across the entire organisation.
- They report about the roll-out to the managing director and the designated safeguarding board member.

3.13 Programme Coordinators

Programme coordinators of horizont3000 have a very important role in the implementation of the safeguarding policy and in the establishment of a safeguarding culture within their scope of work. Especially during the roll-out, they contribute their high-level expertise on countries, partner organisations, programmes and support that the RCOs receive all necessary information. Additionally, they are advocates for the topic and include safeguarding as a cross-cutting issue.

3.14 Communications

As cases on safeguarding are always sensitive issues, no information can be shared with the wider public by any member of staff. The managing director has to decide on all external communication concerning safeguarding complaints and cases.

- Communications staff advise the managing director and the board on communications with media, partner organisations, member organisations and donors in consultation with the head of programmes.
- They coordinate communication with the media according to the decision of the managing director.

^{xi} For more details see internal annex „Roll Out and Implementation Plan“

4. Policy Statement

horizont3000 considers people and their human dignity at the heart of its work. Central to our endeavours is the cooperation with partner organisations that directly engage with disadvantaged groups promoting poverty alleviation, gender equality, social and climate justice and sustainable livelihoods. As a part of these cooperations horizont3000 and partner organisations support each other and get support, may have access to knowledge management tools or use international advisors, assigned by horizont3000. We acknowledge our responsibility to protect all persons we come into contact with by constantly striving to comply with human rights and prevent harm (as described above) from happening and to provide a safe organisation for all persons.

We do not tolerate any power misuse nor harm including sexual exploitation, abuse and harassment, neglect and bullying by contracted staff, associated personnel of horizont3000 and all cooperation partners in programmes and projects horizont3000 is held accountable for.

horizont3000's Safeguarding Commitments

horizont3000

- **acknowledges** that every person she is coming into contact with, regardless of their personal status/characteristic (e.g., age, origin, ethnicity, socio economic status, religion/religious beliefs, gender identity, sexual orientation, physical and cognitive abilities) has the right to be protected from all forms of harm.
- **admits** that where power is involved, there is the risk of abuse. There is an unequal power balance not only between h3 staff/ associated personnel and persons partnering with them and those that participate in/ attend programmes but also within the organisation itself, for example, between hierarchies, different gender identities,

expressions or sexual orientation or other personal status/characteristics. We strongly dictate that our power does not cause any harm to others.

- **believes** that there are groups of persons more likely to be affected by harm due to multiple inequalities, for example, children, women, persons with disabilities, non-binary persons. With this intersectional approach we recognize that several, context-specific factors account for heterogenous experiences.
- **commits** to do our utmost to prevent and to take action against all forms of harm/violence.
- **commits** to implement distinct measures at all levels of the organisation, via the pillars/ key action areas of awareness, prevention, reporting, response and learning. Networking with other organisations in the field of international cooperation is an additional area of our safeguarding efforts.
- **provides** a clear CoC.
- **fosters a safeguarding culture** to sensitize staff and associated personnel on the topic.
- **fosters** open, honest, failure-tolerant attitudes, working environments and discussions.
- **commits** that safeguarding is a regular agenda item in management team as well as board meetings.
- **ensures** confidentiality to the extent possible and in accordance with data protection (unless required by law to break that confidentiality).
- **ensures** protection of any affected persons/victim/survivor of violence, reporters/complainants, persons of trust and others involved and in rehabilitation of suspected persons in case of unfounded suspicion.
- **ensures** oversight and accountability of its safeguarding efforts. This is executed by regular monitoring (including feedback from different stakeholders) and reviewing our safeguarding accomplishments.
- **commits** to ongoing learning and improvement.
- **ensures** accountability and transparency towards all cooperation partners in programmes and projects h3 is held accountable for, donors, and staff, while at the same time maintaining data protection.
- **commits to** ongoing mutual support on safeguarding topics with cooperation partners in programmes and projects h3 is held accountable for as well as exchange, cooperation and coordination with them to avoid double work and overload.
- **enables** exchange on the topic in national and international networks and academia.
- **commits** to provide the necessary resources for implementation and ongoing safeguarding work.

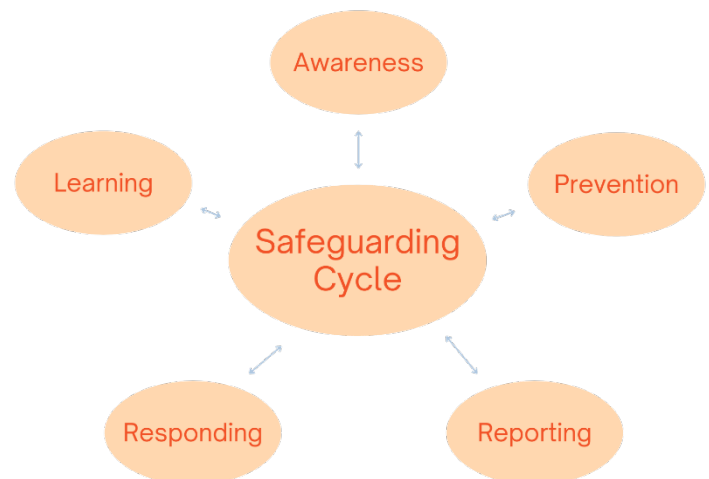
This policy addresses the following areas of safeguarding:

- Children (below the age of 18), vulnerable adults (including staff and associated personnel), protection from Sexual Exploitation, Abuse and Harassment (PSEAH), neglect and bullying

5. Implications/ Procedures

horizont3000 understands safeguarding as a quality criteria and a cross cutting topic throughout the whole organisation. The safeguarding framework consists of the key elements: awareness, prevention, reporting, response (including investigation) as well as learning. They are to be ensured in all working areas and at all levels of the organisation. Each element will be described in more detail below.

Fig. 3: Safeguarding Cycle



horizont3000 is aware that staff and associated personnel can be:

- victims/survivors,
- affected by harm,
- persons of trust,
- observers and reporters/complainants of concerns or incidents,
- wrongdoers / subject of complaint (SoC)

5.1 Awareness

horizont3000 fosters and practices a work climate of openness, where honest, clear and protected communication is appreciated and encouraged. We raise and consolidate awareness of all staff, and associated personnel. Persons in management positions actively promote awareness-raising activities and act as role models.

5.2 Prevention

To prevent harm to those persons coming in contact with h3, we need to create as well as maintain a safe environment for all, at all levels. A range of measures and actions support these commitments. One main focus is the cultivation of an organisational culture that will support safeguarding. A further emphasis is to ensure high quality standards in all areas of human resource management including a clear CoC.

5.2.1 Organisational Culture

Policies and procedures alone are not sufficient for safeguarding to succeed. horizont3000 supports the cultivation of a safeguarding culture through leadership and effective strategy. “Organisational culture encompasses the underlying values, beliefs and codes of practice that make an organisation what it is. It can be seen through behaviour, language, customs, rules, group interaction and habits.”^{xii} We encourage a working environment where people feel safe, confident and empowered to report concerns or complaints. We provide a “culture and ethos with values and behaviors that are articulated and lived at each level of the organisation”^{xiii}.

All persons in management positions should

- lead by example and foster good relationships with their staff,
- clearly speak up to show zero tolerance for any misconduct/ breaches of this policy,
- provide safe spaces to challenge conscious or unconscious bias against discriminatory factors and
- encourage and foster open conversations about safeguarding.

5.2.2 Safe Recruitment^{xiv}

horizont3000 attaches great importance to its human resource agenda which contributes at all levels to ensuring a safe environment for all persons coming into contact with the organisation.

^{xii} Williams/Bond: A respectful organisational culture is crucial to safeguarding

^{xiii} Wonacott and Carmi: Serious Case Review, 2016. p.12

^{xiv} See internal annex “Safe recruitment” for further guidance and tools

We ensure that anyone working for/acting on behalf of us will be subject to the most robust safeguarding checks for which they are eligible.

We are committed to implement the highest standard of selection, recruitment and verification procedures and measures from the selection process of candidates (contracted staff in the offices and advisors) to the onboarding of new employees, as well as via ongoing human resource development in line with this safeguarding policy.

For temporary consultants and freelancers as associated personnel active in the field verification procedures (e.g., identity check, CV, eventually reference checks) will be followed and when in direct contact with vulnerable children and adults a criminal record certificate has to be submitted prior to signing a contract.

From application to selection

All internal and external job advertisements have to clearly refer to safeguarding as a key priority in the organisation, to this policy and to the CoC.

All application documents should be reviewed, especially when the candidate has frequent employer/job changes, the motives for this must be reasonably explained during the interview. The identity of interviewees is proven by official documents.

During first interviews candidates will be again informed about the safeguarding policy and questions concerning safeguarding will be included in the interview. For management positions, advisors and persons with travels to project countries and areas and/ or direct contact to children/disadvantaged adults more in depth safeguarding questions will be asked.

horizont3000 asks for references from managers and colleagues that the applicants have named. In addition, with the prior consent of the candidate, a review may be obtained via the Misconduct Disclosure Scheme, of which h3 is a member (from 2024).

During the Assessment Centres, assignments concerning safeguarding topics may be set on a case-by-case basis. Thus, we get a better understanding of the candidates' viewpoints on safeguarding and on the other hand have the possibility to inform about the organisations' principles and obligations.

Employment and Contracting

All new employees have to provide a criminal record certificate, if available in the respective country, before signing the contract. Employees who work directly with children are required to provide a criminal record certificate for children and youth welfare in addition to the criminal record certificate, if available in the respective country. In case criminal records are not obtainable, alternative ways to check a person's criminal status should be found. On being offered full employment, costs for the records will be reimbursed. Additionally, pursuant to Section 220 of the Criminal Code in connection with Section 9a of the Criminal Records Act (StrRegG), requests for information may be submitted in Austria to the State Police Directorate with regard to possible activity bans. In other countries this should be done as well, if appropriate and in accordance with the national legislation.

horizont3000 does not employ persons with premeditated convictions for violence-related offences.

horizont3000 does not employ persons with convictions for premeditated, violence related offences. In case a criminal record shows any other convictions, the safeguarding officer Austria, the h3 overall responsible person for safeguarding and the future direct superior will decide about an employment.

In addition, the internal “Safe Recruitment Checklist” must be followed.

New employees sign the CoC^{xv} and are thus instructed of the legal and practical framework of their employment. They are subject to the laws, standards and procedures mentioned in section 2 and furthermore declare their subjugation to the criminal code of their respective home and/or host country.

Prospective employees are furthermore instructed that wilful failure to report incidents of sexual exploitation, abuse and harassment might as well lead to prosecution. Any suspicion of the abovementioned actions has to be reported immediately through the respective mechanisms mentioned in the chapter “Reporting”.

Moreover, new employees must be given an introduction to the safeguarding policy no longer than three months after their starting date. At the next possible opportunity, they are additionally required to attend a training on safeguarding.

5.2.3 Other Human Resources Standards

General

horizont3000 clearly defines responsibilities within the organisation including the board, describes them in the job descriptions of the respective employees and reviews them on an annual basis.

We guarantee the protection and support of affected persons/survivors of violence, persons of trust as well as reporters/complainants, subjects of complaint (SOC) (during case management) and other persons involved. Furthermore, we rehabilitate SOCs in case of unfounded suspicion.

We offer external support to those employees that work on case management in case of psychological stress during and after case management.

Criminal Record Certificates

All employees already under contract are required to submit a criminal record certificate. Persons who work directly with children and young people are required to submit a criminal record certificate for children and youth welfare in addition to the criminal record certificate if available in the respective country.

In case criminal records are not obtainable, alternative ways to check a person’s criminal status should be found. Both must contain no criminal convictions contrary to the safeguarding policy, be less than three months old, updated every five years and kept in the personnel file. If an employee has received a relevant criminal conviction during the five-year period and has not voluntarily disclosed it, disciplinary action will be considered and may be taken.

^{xv} Confirming that the safeguarding policy was read, understood and will be followed

Human Resource Development

All horizont3000 employees receive a basic safeguarding training within the first year after the official kick off, refresher and further trainings commensurate with their role and responsibilities in the organisation. Such trainings are defined with and approved by the direct superior.

Safeguarding in the respective work area will be included as a topic in the annual appraisal talks and possible future development opportunities are discussed and determined.

Associated personnel receive the safeguarding policy and Code of Conduct.

Code of Conduct (CoC)^{xvi}

The CoC regulates the conduct of every person working for/ acting on behalf of horizont3000 in all professional relationships, amongst colleagues and when in contact with children and vulnerable adults, and they confirm compliance by their signature. It provides clear guidance as to what we expect, and which conduct is unacceptable.

5.2.4 Risk Assessment

horizont3000 undertakes safeguarding risk assessments to identify possible areas of safeguarding risks in all offices and documents the measures and steps to reduce and eliminate these. The safeguarding risk assessment tool can be found in the internal annex "Risk Assessment".

horizont3000 considers and assesses safeguarding standards during programme development and when reviewing new, and already existing, partner organisations (funding projects and advisor assignments). We follow up the development and implementation of the same throughout the whole project cycle, including during regular monitoring.

"Safe programming aims to make sure that as far as possible community members are safeguarded from intentional / unintentional risks of sexual abuse, exploitation and sexual harassment and other harms that arise from how programmes are designed and delivered. This may also include harm and abuse that takes place between community members, or within families, as a result of the programme."^{xvii}

^{xvi} For the detailed CoC see annex "Safeguarding Code of Conduct"

^{xvii} RSH: How-To Note How CSOs can Design and Deliver Safe Programmes. p. 1

5.3 Complaint Mechanism – Reporting and Responding^{xviii}

5.3.1 General Information

The horizont3000 complaint mechanism describes organisation-wide procedures on where and how to report concerns and complaints and how horizont3000's responds – organises its case management.

A concern or complaint refers to anything in violation of this safeguarding policy with respect to children, vulnerable adults, staff or associated personnel (within the sphere of horizont3000's influence). This can include any form of violence, abuse of power, neglect, bullying, sexual exploitation, abuse, and harassment.

The concern or complaint may be a result of being the victim/survivor, the affected person, being told of it or being the witness. Such disclosures should be reported via the channels delineated below.

horizont3000 follows the below **principles**:

- ↗ Acceptance of all concerns and complaints about breaches of the safeguarding policy and the CoC
- ↗ Staff and associated personnel never investigate on their own
- ↗ Investigations of authorities have priority
- ↗ Respect for confidentiality along the whole process
- ↗ Respect for the victim/survivor centred approach
- ↗ Protection of victim/survivor
- ↗ Involvement of official guardians
- ↗ Share of information about processing with concerned persons
- ↗ Protection of reporters of CoC breaches
- ↗ Protection of the subject of complaint (SoC)
- ↗ Ensuring non-discriminatory processing
- ↗ Offer of external support

The following safeguarding **positions** are in place and have distinct responsibilities assigned to their roles (for details see chapter 6)

In Austria:

- ↗ the safeguarding officer Austria (and deputy)
- ↗ the case management team
- ↗ the decision-making body

^{xviii} For the detailed description of reporting and responding see chapters 5.3.2 and 5.3.3

- the designated safeguarding board member
- an external ombudsperson

In the RCOs:

- the RCOs safeguarding officers (and their deputies)
- external ombudsperson (decided separately for each RCO)

If the safeguarding officer in Austria, safeguarding officers global, a member of the decision-making body or the management team is accused, then the external ombudsperson^{xix} is responsible for case management. The same applies if these persons are biased due to e.g., a close relationship to the SoC. In case staff members with safeguarding responsibilities feel biased due to a close relationship with the victim/survivor or the reporting person, a replacement will be designated by the decision-making body or the designated safeguarding board member. If any other staff member with safeguarding responsibilities is accused of breaching the CoC, the direct superior, the head of programmes in consultation with the safeguarding officer Austria must arrange for a replacement.

5.3.2 Reporting^{xx}

horizont3000 has contact points in place for reporting incidents and concerns. We do the utmost to ensure, that they are as accessible, safe, effective and responsive as possible and we do not penalise those who raise concerns or report incidents. Concerns and complaints can be submitted anonymously and non-anonymously by any person and via the following contact points:

- horizont3000 complaint portal at <https://horizont3000.org/en/complaint-mechanism> provided and managed by the safeguarding systems provider
- the safeguarding officer in the head office
- the safeguarding officer in the regional offices
- the external ombudspersons

Staff with safeguarding tasks have clear and transparent responsibilities written into their job description. In addition, sufficient time resources are made available for these tasks. In urgent cases, safeguarding tasks always take priority over other tasks. If necessary to protect the victim/survivor, this may mean temporary withdrawal/suspension from the rest of the work until the case is resolved.

5.3.3 Responding

All reported concerns and complaints are taken seriously. We will respond to them according to the horizont3000 procedures and legal obligations in a timely (max. within 72 hours) and in safe manner.

^{xix} Details about the responsibilities of the external ombudsperson, see chapter 3.7

^{xx} For the incident reporting forms and incident documentation see h3 internal annexes "Incident Reporting Form" and "Incident Documentation"

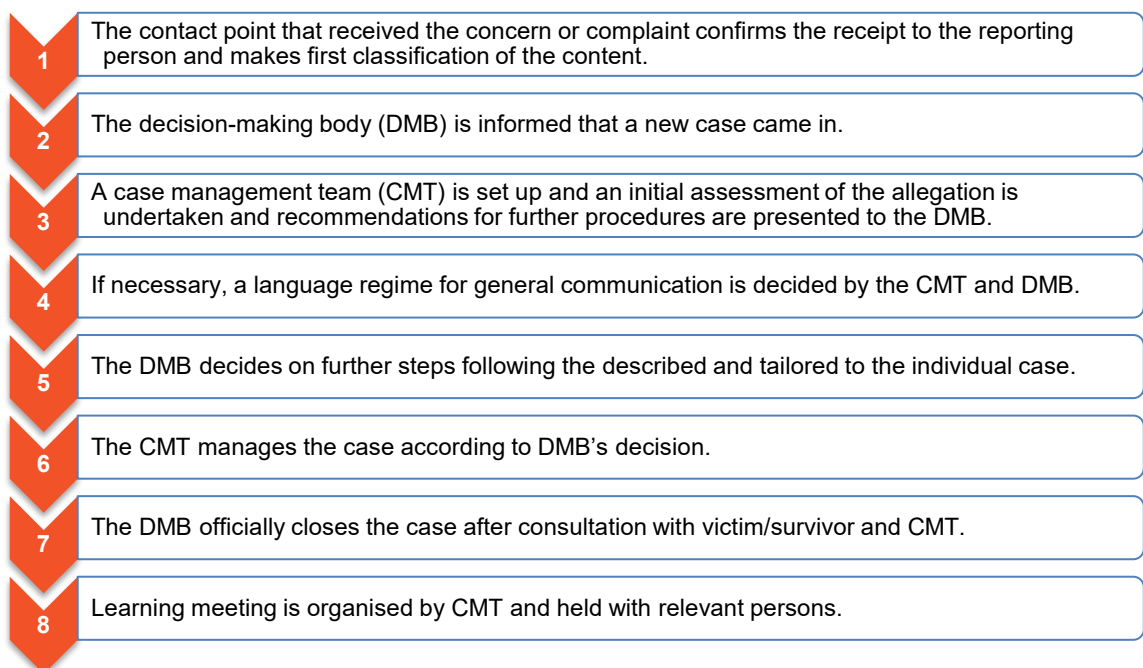
In case complaints are received that do not fall within this scope, support will be provided, e.g., referral to appropriate agencies undertaken in a way that is consistent with good practice.

We will do the utmost to follow fair and transparent response procedure (including investigations) ensuring the rights of all persons involved.

horizont3000 has clearly described procedures for complaints relating to a breach of the safeguarding policy and the CoC:

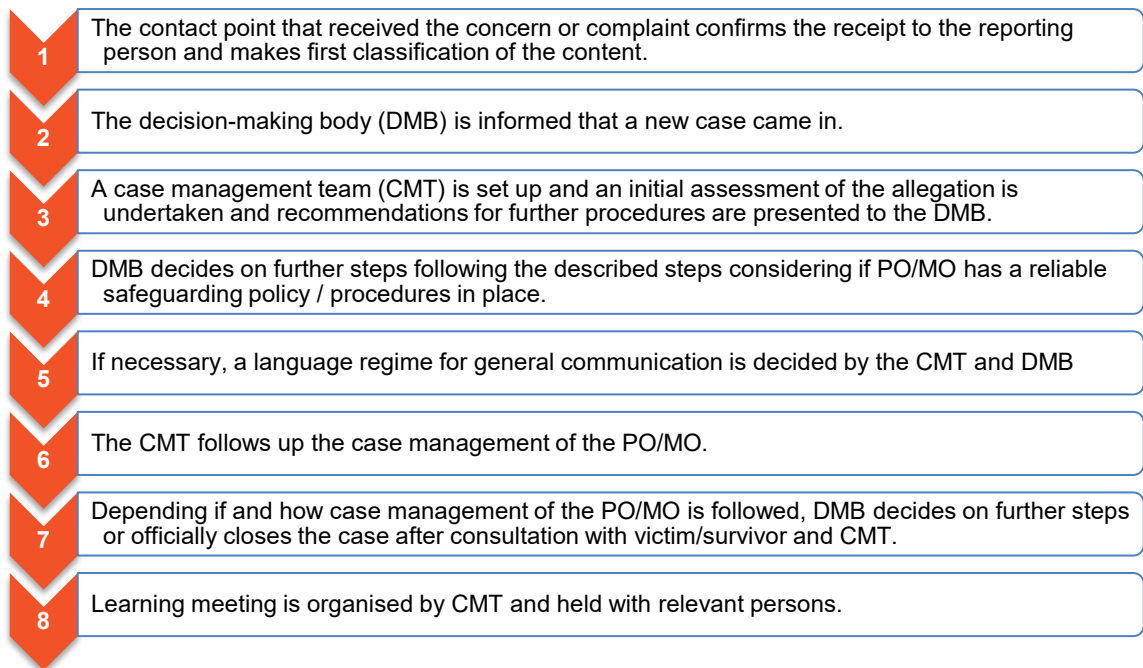
- A) h3 employees and or associated personnel
 - ↗ allegation is substantiated and a criminal offense has been committed (breach of CoC)
 - ↗ allegation is substantiated and is a breach of the CoC (no criminal offense)
 - ↗ allegation is not substantiated and no breach of the CoC or insufficient information for follow up
- B) against staff and associated personnel of a partner or member organisation
- C) against an organisation or individual with no relation to h3

In general, the following steps are taken after a complaint has been received relating to A):

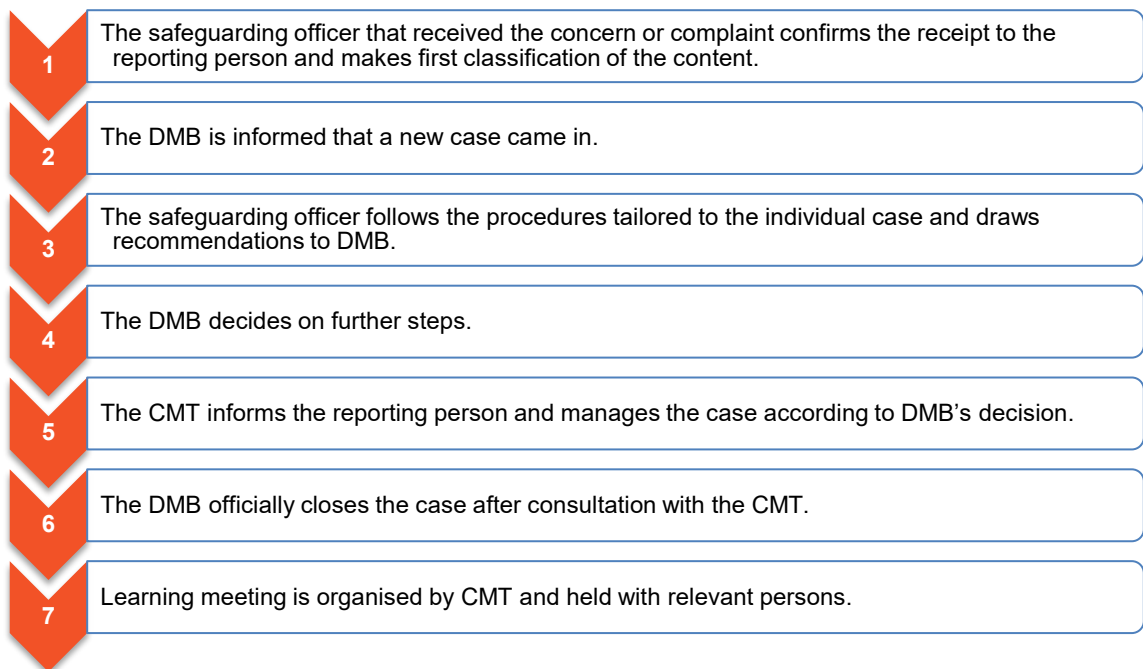


We take swift action with any staff or associated personnel who breaches this policy, especially when there is harm due to sexual exploitation, abuse and harassment. This may include administrative or disciplinary action, legal action, referral to the relevant authorities, criminal prosecution in the alleged perpetrator's country of origin, as well as the host countries.

In general, the following steps are taken after a complaint has been received relating to B):



In general, these steps will follow after a concern or complaint was brought to our attention relating to C):



horizont3000 will offer support to victims/survivors caused by staff or associated personnel. Decisions regarding support will be made by the decision-making body, after consultation with the case management team and, if necessary, the responsible person for legal issues and/or the external ombudsperson, but definitely led by the survivor of harm.

If the complaint **does not concern safeguarding**, the contact point, that received the complaint, informs the reporting person that the complaint does not fall under safeguarding and forwards it to the relevant complaint procedure and/or responsible person, e.g., for anti-corruption, data protection for further internal processing, after confirmation of reporting person.

5.3.4 Learning

horizont3000 defines itself as a learning organisation. In this respect, we, additionally to ongoing learning relevant to safeguarding, also embed learning from every reported safeguarding concern and complaint which we have dealt with, so that our organisation is better positioned to prevent similar concerns or incidents from arising again. Moreover, we support awareness raising and staff trainings, supposed to contribute to the establishment of a safeguarding culture within the organisation.

We will hold learning reviews for all safeguarding incidents individually, according to the level of severity. We will reflect on what went well and what could be improved. The outcomes of the reviews will be documented in a results protocol to support an understanding of the conclusions reached.

To take the process forward in a systematic way, there will be bi-annual reviews and the responsible person to take this forward is the safeguarding officer Austria, eventually supported by the knowledge management team as well as other relevant persons for safeguarding.

To ensure systematisation, transparency and improvements, lessons learned will be shared organisation-wide through internal meetings and/or internal communication and trainings. Confidential information will however be anonymized.

The findings will be incorporated into the adaptation of the policy and associated processes according to the set timeframe specified. If urgent adaptations are necessary, this will be done in an appropriate time frame.

5.3.5 Documentation and Data Protection

New cases are first only available to the first contact point and the case management team. The provision of additional rights to a newly opened case is decided after a first assessment of the complaint received.

All cases reported, case management, responses, recommendations and lessons learned are documented and only accessible to the safeguarding officer Austria case management team, and the decision-making body, unless there is no direct involvement in a case as victim/survivor or SoC. Access by others is decided case by case and on a need-to-know bases. A confidentiality agreement must be signed in this case.

The safeguarding officer Austria prepares annual anonymised reports for the management team and the board and all staff once a year about safeguarding and general cases.

For data protection see chapter 3.10.

5.3.6 Confidentiality

horizont3000 honours and respects confidentiality of all persons concerned when reporting concerns or complaints. As far as possible we strive to maintain confidentiality of claims/accusations (unless required by law to break that confidentiality). The identity of the persons involved in the report and any identifying information or other details are not disclosed,

beyond those involved in the investigation and decision making. Information will only be shared without consent where the duty to protect children and disadvantaged adults from harm supersedes the right to privacy. Nevertheless, it is important for all reporters/complainants to know, that we might be obliged by law to follow up on certain allegations, e.g., with authorities in case of potential criminal offense, with partner organisations or donors according to partner organisation agreements.

All persons involved in the investigation of a reported concern or complaint must manage information respectfully, professionally and in compliance with the respective laws. Additionally, they should not disclose any information, except to those officially designated and confirmed investigators.

We will take strong action against anyone who knowingly broadcasts confidential information about a case or violates our policy of confidentiality in another manner.

Affected persons and survivors of violence may disclose information to support services.

5.3.7 Communication including Digital Communication^{xxi}

Safeguarding is also a key area in horizont3000's communication and will therefore be mainstreamed through all organisational communication (reports, flyer, brochures, website, social media channels, ...). We will strictly obey that any production and dissemination of public relation materials so as not violate the personal rights and the dignity of children, disadvantaged adults, staff and associated personnel and show persons in a dignified, respectful manner, portraying them with their strengths and as equal partners.

The regulations of the European Data Protection Regulation and other legal requirements must also be complied with. We will treat citizens from all countries in the same manner.

Furthermore, we have policies and practical guidelines in place to minimise the risks from digital technologies for staff, children and vulnerable adults. This concerns the safe use of laptops, computers, mobile phones, cameras and social media for all staff and associated personnel, especially for those working with children and disadvantaged adults or visiting projects and programmes.

Illegal, defamatory or offensive content may not be published in either professional or private channels. It is forbidden for all staff and associated personnel, while engaged with horizont3000 to search for and post criminal, defamatory, racist, sexual or violent content in the workplace or on work equipment.

If the respective policies and instructions in guidelines are violated, horizont3000 may take disciplinary and legal consequences.

^{xxi} For detailed information see the CoC in the annex "Code of Conduct", horizont3000 IT Policy and Public Relations Guidelines including Consent Form

6. Safeguarding Standards with Stakeholders

6.1 Partner Organisations

horizont3000 highly values the trustworthy cooperation with partner organisations (funding projects and advisor assignments) (POs). In order to ensure the best possible protection of children and vulnerable adults attending programmes and projects, including our staff and associated personnel, our partners minimise risks in their work and promote safeguarding.

We inform POs about this policy and the conditions that go along with it and support POs in their work on safeguarding. The nature of this support should be determined in the same way as it is usually organised and confirmed with h3 RCOs and head office.

If there are any questions concerning safeguarding, partner organisations should consult with the safeguarding officers or in case there is no, with programme coordinators in the head office.

6.1.1 Cooperation Considerations and Conditions

horizont3000 assesses safeguarding standards already when reviewing new POs (funding projects and advisor assignments) and follow up the development and implementation of the same throughout the project cycle. A specific chapter is added in the regular reporting templates.

Consequently, horizont3000 commits partner organisations to the following requirements for cooperation:

- specific and strong reference to safeguarding measures should be included in partner organisation agreements and contracts.
- partner organisations either have a quality safeguarding policy in place already or pledge themselves to take up the development of a solid safeguarding policy through a participatory process within six months after signing the agreement and to finalise and implement it within two years, following a clear plan.
- if there is already a child safeguarding policy in place, the partner organisation commits to extend the policy to overall safeguarding at the next reasonable date of review and informs other cooperation partners accordingly.
- the partner organisation commits to implement the safeguards set out in its policy, to ensure that the organisation is a safe place for all.
- to inform one of the safeguarding contact points of acute cases and subsequent steps taken.
- to immediately notify one of the safeguarding contacts points if h3 staff or associated personnel are SoCs.
- to report cases to us, where their staff and associated personnel is involved.

We consider the following guiding principles for the development and implementation of safeguarding standards important:

- Participatory development of own safeguarding policy and annex. It should fit the respective organisation and the persons who attend their projects and programmes and should mainly contain
 - a definition of what it covers
 - a definition of who is covered
 - outline the responsibilities of the organisation for prevention
 - outline safeguarding staff responsibility
 - how to raise a concern
 - how the organisation will respond
 - how learning is organized
 - refer to protection of reporters
 - list associated policies and procedures
 - how a gender sensitive and barrier free communication of the safeguarding policy to those persons and groups attending the service of the organisation will be executed
 - state review dates
- The elaboration and implementation should be accompanied with capacity building of staff, and those persons attending the projects and programmes.

6.1.2 Procedure in Case of Concerns or Complaints Raised

Case management is a central part of organisation's internal safeguarding policy and is handled by the organisations themselves. If a suspected case is not being dealt with adequately in a partner organisation, the RCO director activates the head of programmes, the safeguarding officer or another contact point and discusses the further course of action. This could be, for example, obtaining an official statement from the partner organisation, sending an expert to the partner organisation, requesting support from local networks, etc.

Nevertheless, a safeguarding concern raised in relation to a partner organisation does not automatically mean the termination of the contractual relationship. The decision must take into account the reaction of the partner organisation as well as how the issue is addressed, which measures are taken in which time frame.

Without any seriously taken steps, h3 reserves the right to suspend the contractual relationship until adequate measures are taken and/or to withdraw funding and support or terminate it. This is part of the partner organisation agreement.

6.1.3 Mutual Support

horizont3000 highly values mutual exchange, learning and support on the topic and welcomes feedback at any time.

Learning and sharing events might be organised to encourage learning from and with each other and to strengthen as well as promote a safer environment for all.

6.2 Institutional Donors and Foundations

Every institutional donor with which we cooperate will receive a copy of the safeguarding policy. In applications we refer to our policy and annexes and highlight the relevance for our work.

When visiting h3 offices and programmes and projects, staff of institutional donors and foundations must undertake to comply with the associated code of conduct. This commitment is an integral part of the cooperation.

7. Annexes

Annex 1: Glossary

Adult: all persons aged 18 and older

Adult at risk / vulnerable / disadvantaged adult: Any person aged 18 years and older who may be vulnerable to harm, exploitation, neglect, or abuse due to factors such as marginalisation, age, physical or mental disability, illness, cognitive impairment, or dependency on others for care or support - due to the unequal power relationship, misuse of trust potentially inherent in human cooperations. Adult persons may also be at risk if their decision-making capacity is impaired or they do not receive adequate assistance to make informed decisions. Since it can be assumed that everyone can be or become vulnerable due to certain life situations and hence belong to this group of persons.^{xxii} It can be that persons are not inherently vulnerable because they are e.g., female, minorities, migrants, disabled etc. It is the abuse of power, disadvantage and inequality that puts them in a position of vulnerability or risk of harm.

Associated personnel: include but are not limited to the following: board members, members of the general meeting, consultants, trainers, contractors, volunteers, interns, programme visitors as representatives of member and donor organisations, journalists, celebrities, governmental authorities.

Bullying: Bullying is the repetitive, intentional hurting/ aggressive behaviour of one person or group by another person or group, where the relationship (often) involves an imbalance of power.

^{xxii} Adapted and adopted from: Caritas: Gewaltschutzrichtlinie, 2020, p. 18; CBM: Children and adults-at-risk Safeguarding Policy, 2018, p. 1

Bullying can take various forms, including physical, verbal or psychological. It can happen face-to-face or online. It is not always obvious and easily noticed by others. Bullying can have serious consequences for the affected person's physical and mental health, leading to feelings of fear, shame and isolation, as well as long-term psychological effects if left unaddressed. Bullying behaviour can take various forms, including verbal (name calling, sarcasm, spreading rumours, belittling, threats), emotional (ridicule, humiliating, intimidating, excluding, manipulating, physical (pushing, pinching), and increasingly online/ cyber (sending nasty messages, sharing photos, nasty postings on social media).^{xxiii}

Child: in line with the United Nations Convention on the Rights of the Child and for the purposes of this policy, is defined as any person under the age of 18 years. horizont3000 decides for its policy implementation that this definition supersedes any national legislation on age of majority/consent in their country, or the country where they are located or living.

Child Maltreatment: "Child maltreatment is the abuse and neglect of people under 18 years of age. It includes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power. Four types of child maltreatment are generally recognized: physical abuse, sexual abuse, psychological (or emotional or mental) abuse, and neglect."^{xxiv}

Child Marriage: Child marriage refers to any formal marriage or informal union between a child under the age of 18 and an adult or another child.^{xxv}

Child-on-Child Abuse: child-on-child abuse is also known as peer abuse and refers to instances/ allegations or concerns where one child or a group of children engages in abusive or harmful behavior towards another child or group of children. It can encompass various forms, for example physical (hitting, pushing), verbal (name-calling, threats), social (spreading rumours, exclusion), emotional (intimidation, harassment) and in different locations (schools, playgrounds, neighbourhoods, or online platforms). It may involve power imbalance (physical strength, social status). This type of abuse can have significant negative effects on the victim's physical and psychological well-being, leading to feelings of fear, insecurity, low self-esteem, and social withdrawal. It is essential to recognize and address child-on-child abuse promptly, providing support and intervention to both the victim and the perpetrator to prevent further harm and promote healthy social relationships.^{xxvi}

Child Safeguarding: "Child safeguarding is the responsibility that organisations have to make sure their staff, operations, and programmes do no harm to children, that is that they do not expose children to the risk of harm and abuse, and that any concerns the organisation has about children's safety within the communities in which they work, are reported to the appropriate authorities."^{xxvii}

Code of Conduct (CoC): A CoC is a formal document that establishes behavioural standards that all individuals in, or associated with, an organisation are required to uphold. It reflects an

^{xxiii} Adopted and adapted from: Anti-Bullying Alliance: <https://anti-bullyingalliance.org.uk/tools-information/all-about-bullying/understanding-bullying/definition> / acas working for everyone: <https://www.acas.org.uk/handling-a-bullying-discrimination-complaint/> Ludmila N. Praslova, Ron Carucci, and Caroline Stokes in Harvard Business Review : How Bullying Manifests at Work – and How to Stop It, 2022

^{xxiv} WHO: <https://apps.who.int/violence-info/child-maltreatment/>

^{xxv} UNICEF: Child Marriage. <https://www.unicef.org/protection/child-marriage>

^{xxvi} Adapted from: safeguarding network: Child on child abuse: <https://safeguarding.network/content/safeguarding-resources/peer-peer-abuse/> / SOS Children's Villages International: Child Protection Policy, 2008/

^{xxvii} Keeping Children Safe: The International Child Safeguarding Standards p.5

organisation's vision, core values and culture. It is supported by disciplinary procedures that are initiated when a staff member or representative has behaved in an unacceptable way^{xxviii}

Complaint: specific grievance of anyone who has been negatively affected by an organisation's action or who believes that an organisation has failed to meet a stated commitment in their policies and code of conducts.^{xxix}

Complainant/ reporting person: A complainant/ reporting person is an individual who brings forth a formal allegation or complaint against another party, with the intention of seeking redress or resolution for an alleged wrongdoing, violation, or harm.

Complaint mechanism/ procedure: processes that allow individuals to report concerns such as breaches of organisational policies or codes of conduct.^{xxx}

Confidentiality: Confidentiality is a principle or ethical obligation that requires organisations and individuals to safeguard sensitive or private information entrusted to them by others, ensuring that it is not disclosed or shared with unauthorized parties without proper consent or legal justification.

Consent, free and informed: free and informed consent is the voluntary agreement given by an individual based on a clear understanding of the given information and the implications involved in that particular decision or action.^{xxxi}

Cyber Bullying: The term cyberbullying refers to the deliberate and prolonged insulting, threatening, exposing, harassing or ostracising of others via digital media. Cyberbullying mainly takes place on the internet (social networks, chats, messengers, emails, etc.) or via mobile phones (text messages, nuisance calls, messengers, mobile phone photos and videos, etc.). The attacks usually come from people in the victim's own environment.^{xxxii}

Cyber Sexual Violence: "There is no universally-accepted definition of cybersexual violence. However, it can be described as using social media and communication technologies for the following: Sexual comments or advances; attempts to obtain a sexual act; unwanted sexual acts; sexual coercion. It can also be spreading rumors online, sending damaging messages, photos or videos, impersonation and much more. All these behaviours aim to damage a person's feelings, self-esteem, reputation and mental health.^{xxxiii}

Cyber Violence: "Cyber violence is an online behavior that assaults the well-being of a person or group, causing physical, sexual, psychological, emotional or economic harm to them. It is the repetitive abuse of another through technology-assisted means. For example, the aim of the abuse can be to control the other, humiliating others, to force someone into activities, which he or she doesn't want to do.

The lingering impact of cyber-violence has huge psychological and physical consequences, although it seems to be unseen. Survivors of tech-driven violence have experienced anxiety, sleeplessness, stress and feelings of being constantly watched. This non-physical abuse can have very real physical effects on the body and hence this form of violence is just as dangerous as any physical violence.

^{xxviii} Resource and Support Hub, CHS Alliance: How-to Note, 2022, p. 1

^{xxix} Adopted and adapted from: CHSAlliance: PSEAH Implementation Quick Reference Handbook, p.1

^{xxx} Ibid

^{xxxi} Adopted and adapted from: CBM: Children and adults-at-risk Safeguarding Policy

^{xxxii} Translated into English from: Saferinternet.at: Was ist Cybermobbing?: <https://www.saferinternet.at/was-ist-cybermobbing>

^{xxxiii} True2You: Definitions of Cyber Violence. <https://true2you.eu/definitions-on-cyber-violence/>

Abusive persons coerce, control, and threaten victims, infiltrate another's online presence, use tech to isolate, humiliate, punish, and stalk their victims. Sexualized or intimate content is used to control or humiliate the victim. [...] Although cyber violence can affect both women and men, women and girls experience different and more traumatic forms of cyber violence. There are various forms of cyber violence against women and girls, including, but not limited to, cyber stalking, non-consensual pornography (or 'revenge porn'), gender-based slurs, hate speech and harassment, 'slut-shaming', unsolicited pornography, 'sextortion', rape threats and death threats, and electronically facilitated trafficking."^{xxxiv}

Emotional violence/ abuse: emotional violence/ abuse refers to behaviors or actions that inflict harm, intimidation, distress upon another person's emotional or mental well-being. It can have severe and lasting effects on the person's mental health, self-esteem, and overall well-being, leading to conditions such as anxiety, depression, post-traumatic stress disorder (PTSD), or complex trauma. It is a violation of a person's dignity and autonomy and is recognized as a form of abuse in many legal, social, and ethical frameworks. This form of abuse can take various forms, including but not limited to verbal abuse (using words to degrade, insult, or humiliate the affected person, often through yelling, name-calling); manipulation (employing deceptive or controlling tactics to influence the affected person's thoughts, feelings, such as gaslighting or guilt-tripping); isolation (restricting the affected person's social interactions, autonomy, often by limiting their access to friends, family, or support networks) and intimidation (instilling fear or anxiety in the affected person through threats), gestures, or menacing behavior.^{xxxv}

Evidence: is the information gathered during the investigation that proves or disproves an allegation.

Gender Based Violence (GBV): Violence directed against a person because of that person's gender, or violence that affects persons of a particular gender disproportionately.^{xxxvi}

Grooming/ Online Grooming: "Grooming is when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them. Children and young people who are groomed can be sexually abused, exploited or trafficked. Anybody can be a groomer, no matter their age, gender or race. Grooming can take place over a short or long period of time – from weeks to years. Groomers may also build a relationship with the young person's family or friends to make them seem trustworthy or authoritative. Grooming can happen anywhere, including online, in organisations and in public spaces (also known as street grooming). When a child is groomed online, groomers may hide who they are by sending photos or videos of other people. A groomer can use the same sites, games and apps as young people, spending time learning about a young person's interests and use this to build a relationship with them."^{xxxvii}

Harm: refers to the adverse effects, negative consequences by a person as a result of actions, conditions or circumstances and can manifest in physical, emotional or psychological, social

^{xxxiv} Ibid

^{xxxv} Adopted and adapted from: Caritas: Gewaltschutzrichtlinie, p. 18/ CRS Policy on Safeguarding, p.17; care: CARE International Safeguarding Policy: Protection from Sexual Harassment, Exploitation and Abuse and Child Abuse, p. 8

^{xxxvi} Austrian Development Agency: Organisational Policy on the Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH), 2022, p. 2

^{xxxvii} NSPCC: Grooming: https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/grooming/? t_id=Sdruz9LsnG2dZoQRjjaQ8A%3d%3d& t_uuid=pXJHts9BTnW8M0MepOEi-Q& t_q=grooming+online& t_tags=language%3aen%2csiteid%3a7f1b9313-bf5e-4415-abf6-aaf87298c667%2candquerymatch& t_hit.id=Nspcc_Web_Models_Pages_StandardPage/ 9d9a6334-d817-4123-b78b-a4e62fc6c1ca_en-GB& t_hit.pos=1#what

financial status or development impacting their rights, safety and well-being. Generally, it can be intentional and unintentional.

Neglect and negligent treatment: in consideration for different resources and context, neglect and negligent treatment means the failure to meet physical and/ or psychological needs, provide adequate care, attention, or support that is necessary for the well-being and development of a person, either deliberately or through negligence. It often involves ignoring or disregarding the needs, rights, or responsibilities of the neglected person, leading to harm, deprivation, or deterioration of the human's physical, emotional, or social condition. Neglect can manifest in various forms, including but not limited to, physical neglect (such as failure to provide adequate food, clothing, shelter, or medical care), emotional neglect (such as ignoring emotional needs or failing to provide nurturing and supportive relationships), environmental neglect (such as neglecting to maintain a safe and clean living environment).^{xxxviii}

Note on Legal Capacity: In accordance with Article 12 of the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD), horizont3000 recognises that persons with disabilities have the right to recognition as persons before the law and to enjoy legal capacity on an equal basis with others in all aspects of life

Personal Characteristic/ status: includes but is not limited to age, ethnic or social origin, gender identity, genetic features, language, religion/religious beliefs or no, sexual orientation.

Physical Violence: Physical violence is a form of aggressive behavior that involves the intentional use of physical force or power to cause harm, injury, or pain to another person or group. It encompasses a wide range of actions, including hitting, punching, kicking, slapping, biting, choking, or using weapons to inflict bodily harm. It often results in visible injuries, bruises, fractures, or wounds, as well as long-term physical and psychosocial consequences for the victim/survivor.

Rape: "Penetration – even if slightly – of any body part of a person who does not consent with a sexual organ and/or the invasion of the genital or anal opening of a person who does not consent with any object or body part."^{xxxix}

Safeguarding: Safeguarding is about keeping persons safe from and addressing harm that has been caused by the organisation's staff and/or associated personnel misusing their power. It is a compilation of policies, procedures as well as practises to prevent and protect children, vulnerable adults and staff from harm, resulting from coming into contact with projects, programmes or persons of an organisation.^{xl}

Safe Recruitment: All measures taken by the employer to prevent violence during the recruitment process.^{xli}

Sexual assault: "Sexual activity with another person who does not consent. It is a violation of bodily integrity and 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."^{xlii}

^{xxxviii} Adapted from: Caritas: Gewaltschutzrichtlinie, p. 18/ CRS Policy on Safeguarding, p.11

^{xxxix} UN: Glossary on Sexual Exploitation and Abuse. Second Edition, 2017, p. 6

^{xl} Adapted from bond and CHS Alliance

^{xli} Translated into English from: Caritas: Gewaltschutzrichtlinie, 2020, p. 18

^{xlii} UN: Glossary on Sexual Exploitation and Abuse. Second Edition, 2017, p. 6

Sexual Exploitation, Abuse and Harassment (SEAH)^{xliii}:

Sexual exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from sexual exploitation of another.

Sexual abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual harassment: Unwanted physical, verbal, or non-verbal conduct or gestures of a sexual nature that can include indecent remarks, suggestions or demands that are or might reasonably be perceived as offensive or humiliating.

Spiritual abuse :refers to the misuse of religious or spiritual beliefs, practices, or authority to manipulate, control, or harm individuals or groups. It involves exploiting spiritual beliefs and practices to exert power and influence over others in ways that are psychologically, emotionally, or even physically damaging. Spiritual abuse can take various forms, including but not limited to, coercive control, manipulation of scripture or religious teachings to justify abusive behavior, and the imposition of strict rules or practices that restrict individual autonomy and freedom. This form of abuse can have profound and long-lasting effects on a person's sense of identity, self-worth, and well-being, often leading to feelings of guilt, shame, and confusion about their spirituality or faith.^{xliiv}

Spiritual Violence: Spiritual violence can be understood as the infliction of harm or injury upon an individual or group through the abuse of spiritual beliefs, practices, or traditions. It involves the use of religious or spiritual ideologies to justify or perpetrate acts of aggression, oppression, or discrimination. Spiritual violence can manifest in various forms, including but not limited to, the coercion or forced conversion of individuals to a particular belief system, the suppression of alternative spiritual expressions or beliefs, the use of religious authority to control or manipulate others, and the incitement of hatred or violence based on religious or spiritual differences. This form of violence can cause direct harm to individuals but also undermines their sense of dignity, autonomy, and spiritual well-being.^{xliv}

Staff: all contracted co-workers in the head office, the regional and country offices (RCOs) and advisors

Subject of Complaint (SoC)/ potential wrongdoer/ perpetrator: is the person or entity who/that is the focus of an investigation. The person alleged to have perpetrated the misconduct in the complaint.^{xlvi}

Supported decision-making: “With supported decision-making, the presumption is always in favour of the person with a disability who will be affected by the decision. The individual is the decision maker; the support person(s) explain(s) the issues, when necessary, and interpret(s) the signs and preferences of the individual. Even when an individual with a disability requires total

^{xliii} Austrian Development Agency: Organisational Policy on the Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH), 2022, p. 2

^{xliiv} Adopted and adapted from: Agiamondo: Safeguarding Policy, p. 6./ The Church of England: Spiritual Abuse. <https://www.churchofengland.org/safeguarding/safeguarding-e-manual/safeguarding-children-young-people-and-vulnerable-adults/42>

^{xlv} Adopted and adapted from: Agiamondo: Safeguarding Policy, p. 6./ The Church of England: Spiritual Abuse. <https://www.churchofengland.org/safeguarding/safeguarding-e-manual/safeguarding-children-young-people-and-vulnerable-adults/42>

^{xlvi} Adopted and adapted from: bond: Safeguarding definitions and reporting mechanisms for UK NGOs. <https://www.bond.org.uk/resources-support/safeguarding/safeguarding-definitions-and-reporting-mechanisms-for-uk-ngos/#40.%C2%A0subject-of-the-complaint%C2%A0>

support, the support person(s) should enable the individual to exercise his/her legal capacity to the greatest extent possible, according to the wishes of the individual. This distinguishes supported decision-making from substituted decision-making, such as advance directives and legal mentors/friends, where the guardian or tutor has court-authorized power to make decisions on behalf of the individual without necessarily having to demonstrate that those decisions are in the individual's best interest or according to his/her wishes. Paragraph 4 of article 12 calls for safeguards to be put in place to protect against abuse of these support mechanisms.

Supported decision-making can take many forms. Those assisting a person may communicate the individual's intentions to others or help him/her understand the choices at hand. They may help others to realize that a person with significant disabilities is also a person with a history, interests and aims in life, and is someone capable of exercising his/her legal capacity."^{xlvii}

Transactural sex: "Transactural sex is a non-commercial sexual relationship motivated by an implicit assumption that sex will be exchanged for material support or other benefit."^{xlviii} "The exchange of money, employment, goods or services for sex, including sexual favours other forms of humiliating, degrading or exploitative behaviour. This includes any exchange of assistance that is due to beneficiaries of assistance."^{xlix}

Victim/Survivor: refers to a person who has experienced or has been exposed to a safeguarding concern. The term acknowledges the dual role of the individual as both a victim of the initial harm and as someone who has persevered and survived. However, it is the individual's choice how they wish to identify themselves. In this safeguarding policy and annexes both terms are used. Survivor is usually preferred in the psychosocial support sector – because it implies resilience, strength and the capacity to survive.

Victim is a term often used in the legal and medical sectors and has protective implications, as it implies the victim of an injustice which should be sought to redress.¹

Victim/ Survivor-centred approach: means putting the rights, needs, wishes and well-being of the victim/survivor as a priority of an organisation's thinking and procedures, based on principles of safety, confidentiality, respect and non-discrimination.

For further terminology see among others:

ECPAT International: Terminology Guidelines for the Protection of Children from Sexual Exploitation and Sexual Abuse. <https://ecpat.org/wp-content/uploads/2021/05/Terminology-guidelines-396922-EN-1.pdf>

UN: Glossary on Sexual Exploitation and Abuse. Second Edition, 2017. https://hr.un.org/sites/hr.un.org/files/SEA%20Glossary%20%20%5BSecond%20Edition%20-%202017%5D%20-%20English_0.pdf

^{xlvii} UN Department of Economic and Social Affairs. Disability: Chapter Six: From provisions to practice: Implementing the Convention – Legal capacity and supported decision-making, <https://www.un.org/development/desa/disabilities/resources/handbook-for-parliamentarians-on-the-convention-on-the-rights-of-persons-with-disabilities/chapter-six-from-provisions-to-practice-implementing-the-convention-5.html>

^{xlviii} UNAIDS: Transactional sex and HIV risk: from analysis to action, p-4-5

^{xlix} UN: Glossary on Sexual Exploitation and Abuse. Second Edition, 2017, p.7

¹ Adopted and adapted from: bond: Safeguarding definitions and reporting mechanisms for UK NGOs. <https://www.bond.org.uk/resources-support/safeguarding/safeguarding-definitions-and-reporting-mechanisms-for-uk-ngos/#40.%C2%A0subject-of-the-complaint%C2%A0>

Annex 2: Reference Framework

Additional to the

Austrian and International Legal Framework:

- Federal Constitutional Law on the Implementation of the Optional Protocol to the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT); (Bundesverfassungsgesetz zur Durchführung des Fakultativprotokolls zum Übereinkommen gegen Folter und andere grausame, unmenschliche und erniedrigende Behandlung oder Strafe (OPCAT)),
- European Convention on Human Rights (Europäische Menschenrechtskonvention),
- Charter of Fundamental Rights of the European Union (EU-Grundrechtecharta),
- Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention) (Übereinkommen des Europarates zur Verhütung und Bekämpfung von Gewalt gegen Frauen und häusliche Gewalt (Istanbul-Konvention)),
- International Covenant on Civil and Political Rights (Internationaler Pakt über bürgerliche und politische Rechte)
- International Covenant on Economic, Social and Cultural Rights (Internationaler Pakt über wirtschaftliche, soziale und kulturelle Rechte)
- Federal Constitutional Act on the Rights of the Child (Bundesverfassungsgesetz über die Rechte der Kinder),
- Federal Disability Equality Act (Bundes-Behindertengleichstellungsgesetz)
- Austrian Criminal Code (Österreichisches Strafgesetzbuch),
- Federal Equal Treatment Act (Gleichbehandlungsgesetz),
- Austrian Civil Code (Allgemeines bürgerliches Gesetzbuch).
- Various Criminal Codes of host countries

United Nations Conventions:

- UN Universal Declaration of Human Rights
- UN Convention on the Rights of the Child and its optional protocols: Optional Protocol on the involvement of children in armed conflict; the Optional Protocol on the sale of children, child prostitution and child pornography and the Optional Protocol on a communication procedure (individual submission of complaints)
- UN Convention on the Rights of Persons with Disabilities
- UN Convention on the Elimination of All Forms of Discrimination against Women
- UN Declaration on the Rights of Indigenous Peoples