

# GLOBAL SAFEGUARDING REPORT

## FISCAL YEAR 2023

---



---

## Message from the CEO

I am pleased to share Mercy Corps' fifth annual Global Safeguarding Report. We have published this report yearly since 2020 to provide: transparency around the number of safeguarding allegations we receive; the resolution of investigations into those allegations; and our ongoing efforts to strengthen our prevention and response to incidents of abuse, exploitation, and harassment.

In FY23, we prioritized investments in safeguarding roles at the regional and country level to further strengthen our safeguarding efforts where they are needed most. These investments have enabled us to provide more effective, contextual awareness-raising and respond to concerns more effectively than ever before. I am heartened to see an increase in reporting, showing that these investments are paying off with increased trust in our reporting systems and processes.

Fundamental to our Pathway to Possibility is our commitment to being Safe, Diverse and Inclusive. Our aim is to be an organization that is safe and free of exploitation and abuse of any kind where everyone is treated with dignity and respect. We are unwavering in our dedication to the smooth and prompt handling of cases, always prioritizing the well-being of survivors throughout the process.

By transparently sharing our efforts, our progress, and the challenges we still face, we hope to contribute to continuous improvement not only for Mercy Corps, but also for the broader humanitarian and development sector.

Thank you for honoring the trust communities place in us. Together, we **can** prevent misconduct and ensure the safeguarding of all those with whom we work.

With gratitude,



Tjada D'Oyen McKenna  
Mercy Corps CEO

---

## **Table of Contents**

<b>Introduction</b>	<b>4</b>
<b>Executive Summary</b>	<b>5</b>
<b>Our Commitment</b>	<b>5</b>
<b>Safeguarding Governance and Leadership</b>	<b>7</b>
<b>Our Safeguarding Approach</b>	<b>8</b>
<b>Prevention</b>	<b>9</b>
<b>Reporting and Response</b>	<b>15</b>
<b>Reflect and Adapt</b>	<b>19</b>
<b>Looking Forward</b>	<b>20</b>
<b>Annexes</b>	<b>21</b>
<b>Contact</b>	<b>25</b>

---

## Introduction

At Mercy Corps, we support communities – and the most marginalized within them – to emerge from crises in the face of conflict and climate change and build a more inclusive, resilient future. Our 10-year strategy – Mercy Corps’ Pathway to Possibility – reflects our ambition to not only meet the basic needs of communities affected by conflict and climate change, but to achieve lasting, transformational change at scale. **Our mission is to alleviate suffering, poverty, and oppression and help people build secure, productive, and just communities.**

In more than 40 countries around the world, nearly 6,000 Mercy Corps team members work alongside people living through poverty, disaster, violent conflict, and the acute impacts of climate change. We’re committed to creating global change through local impact -- 85 percent of our team members are from the countries where they work. We are grounded in the unwavering belief that people who are most impacted by crises have the ability to determine the solutions.

We believe that freedom from exploitation, abuse, harassment, and trafficking are fundamental human rights, and we are deeply committed to the safety and well-being of the communities, program participants, partners, and team members across the countries in which we work. We strive continuously to create a safe, diverse and inclusive operating environment, where everyone is treated with dignity and respect.

We are committed to transparency and began publicly sharing data around our safeguarding allegations and investigations in 2019.<sup>1</sup> With this publication we continue our annual reporting of case data and updates on our safeguarding progress.<sup>2</sup> As always, our public reporting prioritizes respect for and confidentiality of survivors.

---

<sup>1</sup> We consider safeguarding allegations to include allegations of sexual exploitation and abuse, internal sexual misconduct (including sexual harassment), child safeguarding and human trafficking. For our full policies, see our [website](#).

<sup>2</sup> Our Global Safeguarding Reports can be found on our [website](#).

---

## Executive Summary

This annual report outlines Mercy Corps' safeguarding strategy, status updates, and incident-related data for fiscal year 2023 (FY23).<sup>3</sup> The first section describes our safeguarding commitment, approach, governance, and leadership, and provides an overview of our prevention progress in FY23 and our priorities for FY24.

Detailed data on our case numbers is provided in the "Reporting and Response" section. In FY23, we received 134 reports alleging safeguarding concerns. As of October 1, 2023, all reports from FY23 have been reviewed and closed.

Safeguarding is a critical priority for Mercy Corps and a core component of our organizational commitment to a safe, diverse, and inclusive culture that protects, enables, and elevates marginalized groups. In FY23, we significantly expanded our regional and country-based safeguarding team to ensure that we are able to effectively prevent harm and respond in a survivor-centered way to all allegations.

We have developed, piloted, and refined a set of Safeguarding Core Standards that we are launching in FY24 to further clarify roles, responsibilities, and required activities throughout our programs and operations. We also strengthened our collection and use of data to inform our efforts to mitigate harm and adapt our prevention strategies.

We know that across our sector much work remains to ensure that everyone is safe, included, and free from exploitation and abuse, harassment, and trafficking. We remain deeply committed to progressing as an accountable, survivor-focused organization where everyone is treated with dignity and respect.

## Our Commitment

As a humanitarian and development organization, we frequently encounter communities in their greatest moments of need. Crisis can exacerbate the power disparity between these communities and the organizations, like ours, that support them. We are committed to not

---

<sup>3</sup> Fiscal year 2023 includes July 2, 2022- June 30, 2023.

---

abusing that power. To honor the trust communities place in us, we hold ourselves accountable to five core values:

**Integrity:** We act with honesty, transparency, and respect. We maintain high standards of ethics in everything we do, both in our work for Mercy Corps and in our personal lives. We demonstrate integrity by acting with courage and practicing our values rather than simply professing them.

**Equity and Inclusion:** We treat people with dignity and respect, free of exploitation, harassment, and discrimination. We know that we are at our best when we bring the full diversity of our identities, experiences, and perspectives together to tackle the world's most complex challenges. We are committed to creating a psychologically and physically safe and inclusive workplace and programs by listening to one another, actively challenging and addressing unequal power dynamics, and designing systems and processes that promote equity and inclusion.

**Humanitarian Principles:** We are committed to the humanitarian principles of humanity, impartiality, neutrality, and independence. We carry out humanitarian action on the basis of need. We believe conflict-sensitive humanitarian action is non-negotiable, and we actively integrate do-no-harm principles in every stage of our responses.

**Listening, Learning, and Adapting:** We seek the perspectives of those who are most affected, particularly those who are systematically silenced, and we embrace the knowledge and experience of the people with whom we work. These perspectives enable us to reflect, learn, and adapt so we become the organization we aspire to be.

**Accountability:** We hold ourselves accountable to the needs, priorities, and rights of affected populations. We also hold ourselves accountable to each other, to Mercy Corps' Code of Ethics, and all applicable laws and regulations.

We believe that sexual exploitation, abuse, and harassment are human rights violations. Any form of abuse, exploitation, or trafficking directly contradicts the principles upon which our humanitarian work is based and can cause deep and lasting harm to children or adults who experience it. Mercy Corps has zero tolerance for abuse or exploitation and works to ensure

---

physical and psychological safety within our teams and our programs. We are committed to collaborating with our peer and partner organizations around our shared commitment to ending abuse and exploitation, and to engaging with community members and local organizations that support and elevate the voices of survivors.

Safeguarding is an ongoing commitment; it requires continuous effort and attention on the part of everyone who works with us or on our behalf. We are dedicated to prioritizing this effort, doing all we can to prevent misconduct from occurring, ensuring meaningful access to safe and trusted reporting pathways, and initiating a timely, survivor-centered response should an incident occur.

## **Safeguarding Governance and Leadership**

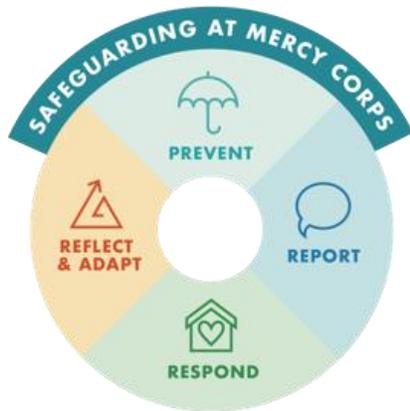
Mercy Corps' stand-alone Ethics and Compliance Department (ECD) is led by our Chief Ethics and Compliance Officer (CECO), Steve Linick, who reports directly to the CEO and the Board of Directors. The Joint Ethics and Safeguarding Committee is a standing Board committee, led by current chair, Emmanuel Lulin, and mandated to provide safeguarding oversight on behalf of the Joint Boards of Mercy Corps Global, Mercy Corps Europe and Mercy Corps Netherlands).

The ECD oversees implementation of an ethics program designed to prevent, detect, and respond to illegal, unethical, or improper conduct, including safeguarding violations, and promotes a culture of integrity throughout the organization. The ECD is responsible for responding to all reports of ethics violations, including fraud, corruption, safeguarding misconduct, and discrimination, harassment, and bullying. Our Case Intake Manager manages our reporting hotline, and our Senior Director of Safeguarding Investigations oversees a team of regionally-based lead investigators and in-country Co-Investigators who are trained in sexual exploitation, abuse, and harassment (SEAH) investigations. We employ separate teams of investigators who respond to fraud and corruption, and HR Code of Ethics allegations.

Our Senior Director of Safeguarding manages the global safeguarding prevention team including a Director of Safeguarding Support, five Regional Safeguarding Advisors, a Europe-based Safeguarding and Inclusion Advisor, and a Systems and Analytics Project Manager who focuses on our data informed approach. The Regional Advisors support in-country safeguarding Focal Points, Champions, and full-time safeguarding roles.

---

## Our Safeguarding Approach



We define safeguarding as **our shared responsibility to ensure that no one working on our behalf causes harm to other team members, partners, or the people and communities with whom we work, and that we respond in an appropriate, survivor-centered way to allegations of exploitation, abuse, harassment, or trafficking.** Safeguarding at Mercy Corps is an umbrella term covering the prevention of and response to sexual

exploitation and abuse of children or adults, physical or emotional abuse or neglect of children, human trafficking and exploitation, and internal sexual misconduct.<sup>4</sup> Underpinning all of our safeguarding work is a commitment to a survivor-centered approach. The safety, well-being, and perspectives of survivors are at the core of our efforts.

Our approach is founded on four broad pillars:

- **Prevent** safeguarding violations through strong policies, safe hiring practices, onboarding, training, and effective management, and by mainstreaming safeguarding into our culture and throughout our programs and partnerships.
- Ensure people feel comfortable to **report** concerns through accessible, safe, and trusted reporting mechanisms that are utilized by participants, community members, our team, and partners. This includes our Integrity Hotline and Community Accountability and Reporting Mechanisms.
- **Respond** to all safeguarding incidents using a survivor-centered approach that prioritizes survivors' rights, wishes, needs, safety, dignity, and well-being. Ensure that safeguarding reports are handled confidentially, and survivors are connected with meaningful support. Conduct professional trauma-informed investigations that are timely and thorough.

---

<sup>4</sup> For definitions of these and other terms see Annex A on page 20.

- 
- Use a data-informed approach; gather lessons learned from each investigation, including feedback from survivors, and track reporting trends and patterns, to **reflect and adapt** in order to continually strengthen our safeguarding systems.

## Prevention

### Increasing our Safeguarding Expertise

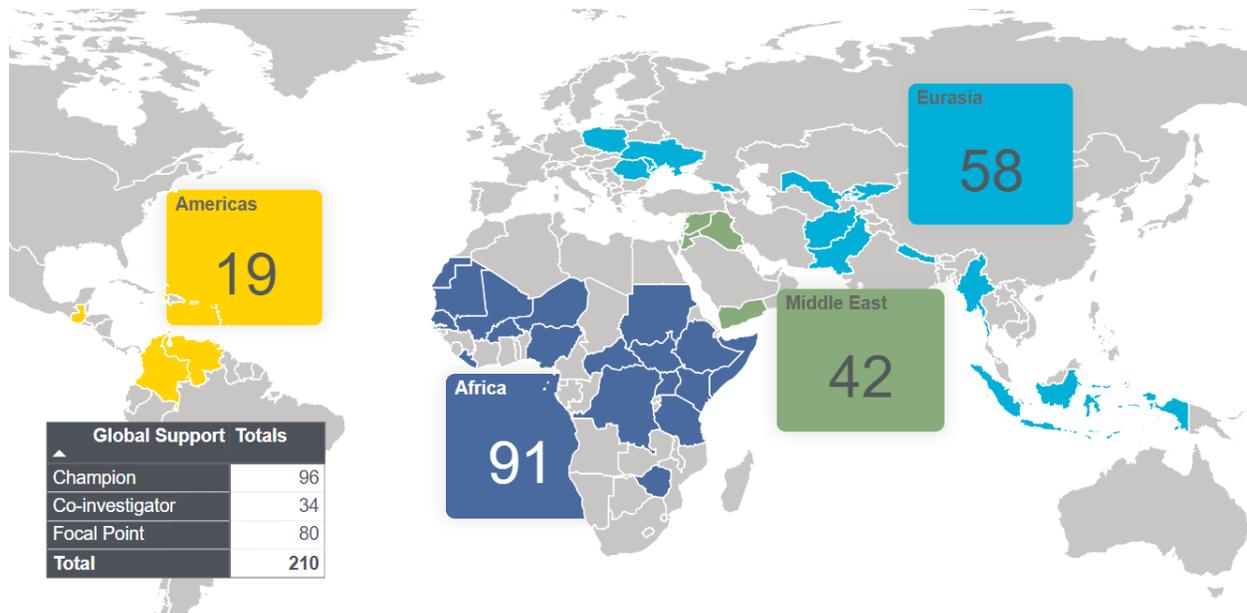
Our dedicated global safeguarding team has continued to expand; this year we welcomed four additional Regional Safeguarding Advisors and now have regional representation in Asia & Europe, the Americas, East Africa, West Africa, and the Middle East. Our Regional Advisors are from the regions where they are based and are available to provide contextual guidance and support to country teams. We also added a Safeguarding and Inclusion Advisor in Europe to continue to advance our efforts to engage in European safeguarding networks and with funders and peer organizations.

At the country level, we expanded the number of trained Safeguarding Focal Points and Champions, Officers, Advisors and Managers who engage directly with teams and programs at a local level. These in-country safeguarding support roles work with their teams to raise awareness, deliver training to team members, and provide support around integrating safeguarding activities into programs. They are trained in survivor-centered principles and are available as a direct reporting channel for individuals with concerns. They create and maintain a database of community resources for survivors, assist in liaising with survivors when needed, and serve as a referral pathway for those in need of medical, psycho-social, or other support.

Following the return of in-person Focal-Point and Co-Investigator trainings in late FY22, we have continued to provide training across the regions where Mercy Corps has active programming. The first Focal Point and Co-Investigator training of the year took place in Nairobi, Kenya, in January. This was followed by additional trainings in Ukraine, Niger, and Colombia. In July, we held our largest ever training in Amman, Jordan, which brought together participants from more than 20 countries across Asia, Europe, the Middle East and Africa. As depicted in Figure I, below, we now have 80 Focal Points and 34 Co-Investigators active in country programs. An increasing number of our larger countries have full-time dedicated

safeguarding team members in addition to trained Focal Points and Champions. We expect this number to increase over the next several years as our Safeguarding Core Standards articulate risk and sized-based minimum staffing levels for safeguarding.

## Mercy Corps Active In-Country Support by Region



**Figure I.** The total number of in-country safeguarding support staff broken down by region and type. Definitions of each role can be found in Annex A.

### Safeguarding Capacity Building and Awareness Raising

Raising awareness and training Mercy Corps team members, partner staff, and program participants on safeguarding prevention is essential to reducing the risk of abuse. Imparting this knowledge and understanding requires in-person, contextually appropriate training, in addition to mandatory onboarding courses. This is one of the key functions of the local safeguarding support roles described above. Safeguarding Champions and Focal Points are tasked with delivering at least one training per month to ensure that knowledge remains fresh and that new team members are reached. These awareness raising sessions are anchored in relevant program and cultural contexts, and safeguarding team members are available to answer questions both in group settings and individually. Training is delivered in person where possible and remotely

---

where circumstances dictate. For country leaders, we provide scenario-based learning opportunities to ensure they are prepared to prevent harm and to respond in a survivor-centered way in accordance with our central reporting and investigation processes.

During fiscal year 2023, safeguarding team members delivered in-person sessions on safeguarding prevention to nearly 4,000 attendees, including team members, program participants, partner staff, and daily workers.

In addition to training, we employ a regular cadence of ongoing safeguarding and ethics communications across the organization in a variety of languages to ensure that team members trust and understand our safeguarding processes, recognize that leadership prioritizes safeguarding, know the importance of speaking out if they see something concerning, and can easily access reporting channels. These communications include our annual Ethics Week, our Integrity Matters newsletter, CECO office hours, webinars, and our “Let’s Talk Ethics” video series in which challenging or complex ethics issues are discussed in an accessible manner for the benefit of team members.

### **Effective and Comprehensive Safeguarding Policies and Standards**

We review our safeguarding policies regularly to ensure they reflect evolving sector best practices, donor requirements, and organizational priorities. We incorporate learnings from case investigations, feedback from team members, and from survivors where possible, to ensure our policies are clear, effective, and reflect the needs and voices of survivors. In FY23, we made significant updates to two safeguarding policies. Our revised Anti-Human Trafficking and Exploitation Policy provides additional provisions to ensure that our programs, operations, and supply chains are free from all forms of human trafficking and exploitative labor, including child labor. We updated our Child Safeguarding Policy with additional provisions on digital safeguarding, grooming, and child labor. The primary provisions, including the absolute prohibition on any form of sexual activity with children under 18, including child marriage, remain unchanged.

The child labor provisions set forth in these policies are based on international standards including the UN Convention on the Rights of the Child and International Labor Organization

---

conventions. These provisions articulate the difference between acceptable work for children under the age of 18 and prohibited child labor, which is work that is mentally, physically, socially, or morally dangerous or harmful to children, and/or interferes with their schooling.

In addition, we are finalizing a stand-alone Safeguarding Core Standards Policy, to launch in early 2024. This Policy will pull all of our safeguarding commitments— at the program and operational levels—into one global framework for the first time, with clearly articulated outputs and responsibilities. Our goal is to ensure that our safeguarding policy standards are as robust and clear as possible, function cohesively together, and are clearly embedded in existing processes and workstreams.

### **Safe Recruitment, Hiring, and Onboarding**

We are committed to preventing abusers from moving throughout our sector and take every effort to vet new applicants thoroughly through a combination of background checks, and interview and reference questions. We are members of the [Inter-Agency Misconduct Disclosure Scheme](#), a collaborative effort of over 240 peer organizations to prevent known perpetrators of sexual exploitation, abuse, and harassment from moving to different organizations across the sector. We have implemented the scheme for all headquarter and international hires and will be rolling it out for local country office hires in 2024. In FY24 we are strengthening our safe recruitment guidance as part of the Safeguarding Core Standards and adding a risk rating for every new position based on the team member’s level of responsibility and contact with participants. Higher risk roles will receive additional scrutiny and more comprehensive safeguarding training at onboarding and later stages. Furthermore, we are improving safeguarding measures throughout our emergency recruitment guidelines and tailoring approaches where needed. All team members must sign our Code of Ethics upon hire and complete mandatory Code of Ethics training during their first 30 days of employment and annually thereafter. These interactive trainings include modules on our different safeguarding policies. In order to pass, participants must demonstrate an understanding of expected standards of behavior, reporting obligations, and how to report concerns. We are updating these E-learning trainings in FY24.

### **Programmatic Mainstreaming**

---

We support country and program teams to mainstream safeguarding best practices into every phase of our program cycle beginning from the program identification and design phase, through to implementation and the closeout phase. This is outlined in our safeguarding program guidance, which include safeguarding risk assessments, ensuring appropriate measures are in place for engaging short-term or “daily workers”, integration in budgets and ensuring close follow up on identified mitigations. Country offices are provided with support from our Regional Safeguarding Advisors who ensure close technical guidance, in-country support visits where needed and collaboration with other functions such as protection, Gender, Equity and Social Inclusion (GESI) and Community Accountability Reporting Mechanisms (CARM). Throughout FY23, we provided close in-person support to specific country offices with high-risk contexts such as South Sudan, DRC, Palestine and Mali.<sup>5</sup> Our teams proactively collaborate with programmatic functions to continue to implement and improve our mitigation measures.

### **Vetting, Monitoring, and Supporting Partners and Suppliers**

We are committed to localization— to intentionally shifting power and decision making to the communities where we operate. We work with over 700 partners who share our commitment to humanitarian principles. We hold our partners to the same safeguarding standards as our team members, including via contractual commitments in our partnership agreements. Where relevant, our in-country safeguarding team members support partners to strengthen their safeguarding systems and processes, and in some cases, provide direct training to partner teams. As part of the Core Standards, we have integrated additional questions into our pre-award due diligence for all sub-awardees and piloted a new Joint Assessment and Monitoring tool to identify areas to follow up with relevant support where necessary. We have a simple, easy to translate, Partner Code of Conduct for implementing partners to use when their existing policies are not substantially equivalent to ours or do not meet IASC standards.

We have updated our Field Procurement Policy and Procedures to include additional due diligence measures to support the revised Anti-Human Trafficking and Exploitation Policy. These procedures include mandatory supplier reference checks with questions related to

---

<sup>5</sup> These and other contexts are considered particularly high risk for sexual exploitation and abuse according to the [IASC Sexual Exploitation and Abuse Overview Index](#).

---

human trafficking and exploitation for all standard tenders, a supplier questionnaire that includes questions on how the supplier assesses the risks around human trafficking and exploitation for all tenders, and site visits for high value tenders and those in industries with higher risk for human trafficking and exploitation, such as construction.

In addition to vetting and monitoring, we actively collaborate with suppliers to provide them with relevant information and training related to safeguarding when needed. Our commitment to monitoring and supporting our suppliers in safeguarding prevention is integral to our dedication to ethical sourcing and social responsibility, ultimately ensuring a safer and more responsible supply chain.

We publish an annual Modern Slavery Statement, as required by the UK Modern Slavery Act 2015. The statement is available on the [Mercy Corps Website](#) and details the steps that we take to mitigate the risks of modern slavery within our operations and supply chain. In addition, we complete the FCDO Modern Slavery Assessment Tool (MSAT), a self-assessment tool designed to support suppliers of FCDO services to assess modern slavery risk and reduce the risk of exploitation of workers in supply chains. We have significantly improved our score on this tool, particularly through strengthened Key Performance Indicators to monitor modern slavery prevention and strengthened due diligence processes within the supply chain and we continue to engage with FCDO to further respond to MSAT recommendations.

### **Safe, Diverse, and Inclusive Commitment**

Safeguarding is integral to our Safe, Diverse, and Inclusive Commitment, which is one of five core commitments underpinning our ten-year strategy. For us, safety means respect, dignity, and living free from harm and exploitation. Diversity values the differences – both visible and invisible – that make each individual unique. Inclusion means that Mercy Corps' teams, programs, and partnerships thoughtfully create safe spaces and a culture of belonging for all people. We understand that these efforts are interdependent; we cannot keep communities and team members safe without also promoting diversity and inclusion in all we do. Our Safe, Diverse, and Inclusive Commitment coordinates a variety of different departments and initiatives that are all interconnected and enhance safety, participation, accountability, localization, and learning. These include our People Team; internal Gender, Diversity, and

---

Inclusion efforts; safeguarding and protection work; Gender Equity and Social Inclusion programming efforts; Accountability to Affected Persons (AAP) and CARM; and our Locally Led Commitment. Together we strive to eliminate inequitable power dynamics, address the systems that perpetuate discrimination and abuse of power, and foster a culture of equity, integrity, and accountability in our operations, culture, and programming. We show up in a respectful way and give space for the expression of diverse individual perspectives and priorities.

All Mercy Corps team members are responsible for incorporating measures that ensure safety, dignity, meaningful access, accountability, and inclusive participation across all programming as well in our workplace and operations. They are also responsible for modeling our four Core Leadership Behaviors: inclusion, collaboration, acting with integrity, and being curious.

## Reporting and Response

We comprehensively updated and redesigned our Integrity Hotline and safeguarding case management system in late FY22. Our improved Integrity Hotline includes a streamlined reporting website, multilingual phone lines, and an email address. In FY23, our upgraded safeguarding case management system allowed our Safeguarding Investigations team to efficiently triage safeguarding reports and provide timely analysis of safeguarding trends.

### Reporting Mechanisms

Trusted, accessible, and well-utilized reporting channels are fundamental to safeguarding. We have continued to invest in and strengthen our internal and external reporting mechanisms, providing a variety of options for individuals to report concerns in ways that feel comfortable for them.

For community members and program participants, we provide accessible and locally relevant CARMs.<sup>6</sup> CARM implementation has been a key organizational priority and locally relevant, contextual CARM systems are operational across our locations and programs. Our global

---

<sup>6</sup> Team Members may also use a community accountability reporting mechanism if they choose, and community members or participants are welcome to use the Integrity Hotline or other reporting avenues.

---

CARM Policy outlines nine minimum standards for community accountability and clear requirements for partners.<sup>7</sup> All Mercy Corps country programs and entities are required to meet the standards within this policy to ensure a consistent, quality approach to community accountability, while maintaining responsiveness to community needs and perspectives.

We provide a number of internal reporting channels to ensure that team members have an option that works for them, in the language of their choice. Team members may report directly to the Mercy Corps Integrity Hotline via email in any language. Our Integrity Hotline web portal and Integrity Hotline phone lines<sup>8</sup> provide a streamlined multilingual end-user experience that allows for confidential reporting with the option to report anonymously. Team members may also report safeguarding concerns directly to CARM, management, Human Resources, or safeguarding team members, all of whom are required to report immediately to the Integrity Hotline.

We know from research in the sector,<sup>9</sup> that many incidents of exploitation and abuse remain unreported and that survivors face significant barriers to reporting in many of the contexts in which we work. Our CARM systems have nearly tripled their safeguarding reporting since FY21, which is an encouraging sign that awareness and trust in our reporting systems continues to expand.

### **Incident Response and Investigations**

We are committed to a professional, trauma-informed, and survivor-centered response to all safeguarding allegations. Our Safeguarding Investigations team is part of the Ethics and Compliance Department and reports to the CECO. A diverse and multilingual team of experienced safeguarding investigators are located in regional hubs and report to our Senior Director of Safeguarding Investigations.

---

<sup>7</sup> See Annex D for Mercy Corps' nine CARM minimum standards.

<sup>8</sup>Our Integrity Hotline reporting web portal is hosted by i-Sight, a third-party platform with 24/7 access. Our Integrity Hotline phone lines are available 24/7 and hosted by Convercent, a third-party contractor.

<sup>9</sup> See for example: Safeguarding Resource Support Hub, [Summary: Barriers to reporting on Sexual Exploitation, Abuse and Sexual Harassment \(SEAH\)](#)

---

The Safeguarding Investigations team is supported by our in-country Safeguarding Co-Investigators (see Figure 1, above).<sup>10</sup> Co-Investigators undergo SEAH-specific investigations training and work under the direction of our headquarters-based investigators. Co-Investigators engage with Safeguarding Focal Points to make connections between survivors and the support services identified in our community resource maps. Co-Investigators have become an invaluable resource enabling us to manage remote investigations with on-the-ground support.

In FY22, we procured and developed a new case management system, which includes built-in data analytics tools that we have used to improve our monitoring of safeguarding trends and ensure an efficient response to safeguarding incidents.

### **Response and Incident-Related Data for FY23**

In FY23, Mercy Corps received 134 reports that alleged safeguarding concerns. Comparatively, we received 100 safeguarding reports in FY22 and 65 in FY21. All FY23 safeguarding reports are closed. Required confidential notifications to donors (and regulators, where appropriate) regarding specific reports were issued in alignment with our donor agreements and Mercy Corps' Donor Notification Standard Operating Procedures.

After a preliminary review, not all of the 134 reports constituted potential violations of Mercy Corps' safeguarding policies or were even related to Mercy Corps' programs or people. Following survivor-centered investigations, 27 reports were determined to be substantiated violations of Mercy Corps' safeguarding policies. A total of 7 substantiated reports involved minor survivors (4 non-sexual reports including concerns related to child labor and 3 instances of sexual abuse/exploitation). Nine involved internal sexual misconduct (team member to team member) of varying degrees, including undisclosed relationships. Eleven involved sexual exploitation or abuse and, in several cases, also implicated Mercy Corps Anti-Human Trafficking and Exploitation Policy, which prohibits the procurement of commercial sex.

All substantiated reports resulted in disciplinary action, including 19 employment terminations or terminations of contracts. In all instances, team members who were terminated became ineligible for rehire and contractors became ineligible for further awards or future contracts.

---

<sup>10</sup> For cases involving Executive Team or Board members, we engage external expert investigators.

---

Former team members' ineligibility status will be shared with prospective employers, including through the Inter-Agency Misconduct Disclosure Scheme. In all substantiated reports involving exploitation or abuse of a participant or community member, the team member's employment or the partnership subaward agreement was terminated. Substantiated reports also resulted in process and program improvement recommendations that are being carried forward by our Safeguarding Regional Advisors in partnership with country and regional teams.

In all allegations involving an identified survivor, we offered support to those survivors, regardless of whether they wished to be involved in an investigation, and regardless of whether the allegation involved a Mercy Corps team member or partner. Types of support provided included medical, financial, educational, and psycho-social support.

We strive to conclude all safeguarding investigations within 90 days and met that goal during FY23. However, we recognize that following our survivor-centered approach may necessitate longer investigations on occasion.

### **Reflections on Fiscal Year 2023 Data**

We had a 34% increase in reporting during FY23 compared to FY22. Our Regional Safeguarding Advisors have worked closely with our in-country safeguarding support roles to develop and provide targeted training for team members on our safeguarding policies and reporting systems. Our [Code of Ethics](#), which launched in early FY23, emphasizes our team member and partner obligations to report any good faith concern, whether personally or anonymously. In alignment with our Core Behaviors, we encourage our team members to act with integrity and err on the side of reporting. We believe the increased levels of safeguarding reporting reflect these continuing and collective efforts to build trust in our reporting systems and safeguarding response. While we continue to aim for a sector free from exploitation and abuse, we know there are significant barriers to reporting in most contexts and see an increase in reporting as a positive step.

### **Reflect and Adapt: An Evidence Driven Approach**

In alignment with Mercy Corps' Pathway to Possibility, we strive to be evidence driven. We analyze case data to continuously improve and adapt our prevention and response efforts. We

---

regularly review trends and reflect on quantitative and qualitative data at the end of each quarter. We seek input from survivors at the close of each case and integrate recommendations or other qualitative information they provide. Our case management system, i-Sight, includes customized integrated analytics tools that alert our response and prevention teams to emerging trends in safeguarding reporting. These timely alerts help guide targeted prevention efforts and program improvement recommendations. i-Sight also ensures we accurately track an expanded range of data points that allow for richer data analysis which better informs our prevention efforts.

We are using our collection of data to continue working with our sector peer agencies to safely and transparently share anonymized high-level safeguarding information. To ensure greater accountability and identify broader trends in sector safeguarding reporting, Mercy Corps is a member of the Steering Committee for a pilot project entitled “SEAH Data Harmonization,” designed to share safeguarding information across the sector and with the public. The pilot is coordinated by the Core Humanitarian Standards (CHS) Alliance and supported by multiple donors, including USAID and FCDO. The pilot portion of the project concludes in October 2023 and will begin scaling up in winter 2023.

Finally, at the end of a safeguarding investigation, we examine the specific conditions that existed and may have made the incident more likely to occur. We make recommendations for disciplinary and corrective action and follow up with country teams on the implementation of those actions. We consider all implications that stem from our analysis of a given case—from recruitment and hiring, to onboarding and training, program design, implementation and management, to the reporting and investigation process—always looking for ways we can prevent similar situations from occurring and improve our response if they do.

## Looking Forward

Fiscal year 2023 was a year of rapid growth for the safeguarding team as we continue to focus on locating safeguarding support in the countries and regions where it is most needed. We look forward to the rollout of our Safeguarding Core Standards Policy in FY24 and to continued

---

focus on building a safe, diverse, and inclusive culture throughout Mercy Corps' team and operations.

---

## Annexes

### Annex A: Referenced Definitions (in alphabetical order)

- Child Safeguarding (CS) Case: Includes allegations of physical, emotional, or sexual abuse, or otherwise putting children at risk of harm.
- Community Accountability Reporting Mechanism (CARM): CARM is a channel for all community members to provide feedback, suggestions, complaints, and concerns in a manner that is safe, confidential, transparent, and accessible, enabling Mercy Corps to respond and make any necessary programmatic or safeguarding adaptations and to ensure the safety, security, and empowerment of program participants.
- Inconclusive Case: We are unable to obtain sufficient evidence to make a determination around substantiation of the specific allegations, for example, because the report is by an anonymous third party and/or does not identify a particular survivor or subject of complaint. In such cases we take any action possible to investigate in a survivor-sensitive way and to provide opportunities for other complaints to be raised. In addition, we review programs and systems to ensure they meet our safeguarding standards, and that team members, participants, partners and community members understand their rights and how to report concerns.
- Partners: Sub-grant recipients, partner organizations, contractors, outside experts, consultants, agents, representatives, and any other organizations or individuals that act on Mercy Corps' behalf or at Mercy Corps' direction.
- Pending Case: A case where the investigation is ongoing.
- Safeguarding Allegation: We consider safeguarding allegations to include allegations of sexual exploitation and abuse, internal sexual misconduct (including sexual harassment), child safeguarding and human trafficking.
- Safeguarding Champion: Safeguarding Champions play a similar role to Safeguarding Focal Points by raising awareness and producing community resource maps, which are used as part of our survivor-support practices and service-referral process. Safeguarding Champions work at a reduced technical capacity and are not a replacement for Focal Points. They are an important addition to our global safeguarding team and supplement our in-country support surrounding safeguarding prevention efforts.

- 
- **Safeguarding Co-Investigator:** Safeguarding Co-Investigators act as in-country investigative support when allegations of safeguarding violations are reported. They provide local contextual information, translation, and facilitate investigation planning, communication, and implementation. With guidance and supervision from full-time lead investigators, the Co-investigators may take on-the-ground investigative action including participating in interviews, examining evidence, and reviewing relevant documents.
  - **Safeguarding Focal Point:** Safeguarding Focal Points are in-country safeguarding resources, working with team members to build trust and confidence in our reporting mechanisms. They also provide on-the-ground information and feedback to help inform our organization-wide safeguarding strategy and approach. Focal Point training includes survivor-centered approaches to incident responses, referral pathways, community resource mapping, international safeguarding standards, community and team member reporting, safeguarding risk assessment, and other related skills.
  - **Sexual Exploitation and Abuse (SEA) Case:** Allegations of sexual exploitation and abuse of participants in our programs or other community members including: actual or attempted abuse of position of vulnerability, power differential, or trust for sexual purposes; profiting monetarily, socially, or politically from the sexual exploitation of another; exchange of assistance for sexual or romantic relations; sexual abuse of program participants or community members; and paying for sex or sexual acts.
  - **Sexual Misconduct (SM) Case:** Allegations that include instances of sexual misconduct in the workplace, including sexual harassment (quid pro quo or work environment) and sexual assault. This also includes undisclosed relationships along reporting lines.
  - **Substantiated Case:** Where the investigation concluded that it is more likely than not that the violation occurred.
  - **Team Member:** All team members globally, including Mercy Corps' Boards of Directors, executive officers, management, team members, seconded employees, temporary staff, interns, and volunteers.
  - **Temporary or Daily Workers:** Individuals hired on short term contracts as part of a program.
  - **Unsubstantiated Case:** Where the available evidence was insufficient to conclude that it is more likely than not that the violation occurred.

- Visitors: Visitors to Mercy Corps facilities, including photographers, filmmakers, journalists, researchers, donors and prospective donors, and anyone else hosted by Mercy Corps or visiting Mercy Corps implemented or financially supported programs.

**Annex B: Relevant Links and Referenced Documents**

- [Mercy Corps Website](#)
- [FY19 Global Safeguarding Report, Part I and Part II](#)
- [FY20 Global Safeguarding Report](#)
- [FY21 Global Safeguarding Report](#)
- [FY22 Global Safeguarding Report](#)
- [Mercy Corps Ethics Policies](#)
- [Mercy Corps Code of Ethics](#)

**Annex C: Mercy Corps Global Footprint by Region FY23**  
**Africa**

- Countries of operation: 19 <sup>11</sup>
- Programs with participants in FY 2023: 109
- Participants: 14,099,938



**Asia and Europe**

- Countries of operation: 16
- Programs with participants in FY 2023: 70
- Participants: 6,681,711



**Middle East**

- Countries of operation: 6
- Programs with participants in FY 2023: 62
- Participants: 2,293,138



**Americas**

- Countries of operation: 7



<sup>11</sup> This number includes the countries where Agrifin operates (Tanzania, Zambia). Agrifin operates under "Global Initiatives" only.

- 
- Programs with participants in FY 2023: 33
  - Participants: 1,639,829

---

## **CONTACT**

STEVE LINICK

Chief Ethics and Compliance Officer

[slinick@mercycorps.org](mailto:slinick@mercycorps.org)

KAREN BARNETT

Senior Director, Safeguarding

[kbarnett@mercycorps.org](mailto:kbarnett@mercycorps.org)

LAURA RAGAN

Senior Director, Safeguarding Investigations

[lragan@mercycorps.org](mailto:lragan@mercycorps.org)

### **About Mercy Corps**

Mercy Corps is a leading global organization powered by the belief that a better world is possible. In disaster, in hardship, in more than 40 countries around the world, we partner to put bold solutions into action — helping people triumph over adversity and build stronger communities from within. Now, and for the future.

### **Global Headquarters**

45 SW Ankeny Street Portland, Oregon 97204 888.842.0842

[mercycorps.org](http://mercycorps.org)

### **European Headquarters**

96/3 Commercial Quay Edinburgh, EH6 6LX Scotland, UK 44.131.662.5160

[mercycorps.org.uk](http://mercycorps.org.uk)