

GLOBAL SAFEGUARDING REPORT

FISCAL YEAR 2025



Message from the CEO

This has been a year of profound change for the humanitarian sector, one that has tested the resilience of all humanitarian organizations, including Mercy Corps, and the communities we serve. Significant shifts in global funding and operating contexts have necessitated difficult adjustments. Through it all, our commitment to ethics and safeguarding has remained constant and unwavering.

I am pleased to share Mercy Corps' seventh annual Global Safeguarding Report. Since 2019, we have published this report to provide transparency around the number of safeguarding allegations we receive; how we address them; and our continued efforts to prevent abuse, exploitation, and harassment. Each year's report is both a reflection of progress and a reminder that safeguarding is never complete work.

Despite significant upheaval over the past year, we continue to strengthen our systems and culture of accountability. I'm encouraged by increasing confidence in our reporting mechanisms and ongoing collaboration across the humanitarian community to raise standards and share learning, challenges, and progress so that we all continuously improve together.

Safeguarding is a collective responsibility and an expression of who we are. It demands vigilance and courage from each of us. Most importantly, we center the people we serve. We are committed to survivor-focused responses and to upholding safety, respect, and trust in all that we do.

With gratitude,



Tjada D'Oyen McKenna, Mercy Corps CEO

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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 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.**

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 – 95 percent of our team members are from the countries where they work.

We know Safeguarding risks have intensified due to the growing number of unanticipated and unmet needs across many contexts, leaving individuals more vulnerable than ever. At the same time, survivor support services—many of them operated by international humanitarian organizations—have been reduced or shuttered due to widespread program cuts. We believe that sexual exploitation, abuse, and harassment are human rights violations. Any form of abuse, exploitation, or human 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 inaction on abuse or exploitation, and we continue to work 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.

We have been publicly sharing data around our safeguarding allegations and investigations since FY19.¹ With this publication we continue our annual reporting of case data and updates on our safeguarding progress.² As always, our public reporting prioritizes respect for and confidentiality of survivors.

Executive Summary

This annual report outlines Mercy Corps' safeguarding strategy, status updates, and incident-related data for fiscal year 2025 (FY25).³ The first section describes our safeguarding commitment, approach, governance, and leadership, and provides an overview of our prevention progress in FY25.

Detailed data on our case numbers is provided in the “Reporting and Response” section. In FY25, we received 216 reports alleging safeguarding concerns. All reports from FY25 have been reviewed and closed with 49 allegations substantiated. All substantiated cases resulted in disciplinary action.

Despite the changing landscape of the humanitarian sector, safeguarding remains a critical priority for Mercy Corps and a core component of our organizational commitment to a safe, diverse, and inclusive culture.

Safeguarding Governance and Leadership

Mercy Corps' 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, led by chair Emmanuel Lulin, provides safeguarding oversight on behalf of the Joint Boards of Mercy Corps Global, Mercy Corps Europe and Mercy Corps Netherlands.

¹ We consider safeguarding allegations to include allegations of sexual exploitation and abuse, internal sexual misconduct (including sexual harassment), child safeguarding and human trafficking. Our safeguarding policies can be found on our [website](#).

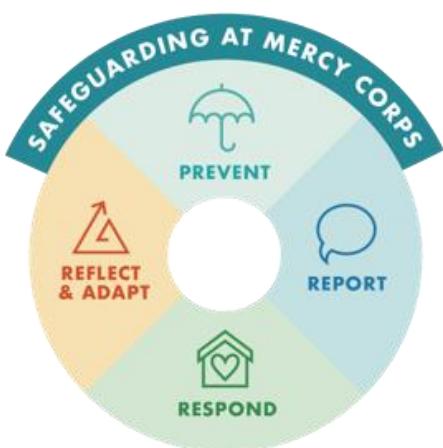
² Our Global Safeguarding Reports can be found on our [website](#).

³ Fiscal year 2025 includes July 1, 2024- June 30, 2025.

The ECD promotes a culture of integrity throughout the organization and oversees an ethics program designed to prevent, detect, and respond to illegal, unethical, or improper conduct, including safeguarding violations. 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 and Global Human Resources Code of Ethics 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. Separate teams of investigators respond to fraud and corruption allegations.

Our Senior Director of Safeguarding manages the global safeguarding prevention team including a Director of Safeguarding Support, and three Regional Safeguarding Advisors. The Regional Advisors support in-country safeguarding Focal Points, Champions, and full-time safeguarding roles. We continue to train new focal points with a global training planned for the second quarter of FY26.

Our Safeguarding Approach



We define safeguarding as **our shared responsibility to ensure that no one acting 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. Underpinning 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, effective management, and by mainstreaming safeguarding into our culture and throughout our programs, operations and partnerships.
- Ensure people feel comfortable **reporting** 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.
- **Reflect and adapt**, using a data-informed approach. We gather lessons learned from investigations, including feedback from survivors, and track reporting trends and patterns, in order to continually strengthen our safeguarding systems.

Safe, Diverse, and Inclusive Commitment

Safeguarding is integral to our Safe, Diverse, and Inclusive Commitment, one of five core commitments underpinning our organizational strategy. We understand that safety, diversity, and inclusion are interdependent; we cannot keep communities and team members safe without also ensuring representative teams where people feel comfortable speaking up. Our Safe, Diverse, and Inclusive Commitment requires the coordination of a variety of different departments and initiatives to enhance safety, participation, accountability, localization, and learning. These include our People Team; Team Engagement and Effectiveness; safeguarding and protection work; Gender Equity and Social Inclusion programming efforts; Community Accountability; Security; 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. In addition, all Mercy Corps team members are responsible for embodying our four Core Behaviors: inclusion, collaboration, acting with integrity, and being curious. Leaders and team members are evaluated based on how well they demonstrate these behaviors.

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, and feedback from team members and communities to ensure our policies are clear, effective, and reflect the needs and voices of survivors. In FY25, we revised two key global safeguarding policies. Our [Prevention of Sexual Exploitation, Abuse, and Harassment of Program Participants and Community Members \(PSEAH\) Policy](#) was updated to explicitly include sexual harassment of program participants and community members in the title for clarity. We also further clarified our prohibition around sexual relationships between anyone working on our behalf and anyone who may be considered a program participant. The [Sexual Misconduct in the Workplace](#) Policy was updated to clarify our definition of stalking and our prohibitions around the use of social media and electronic communications for sexual purposes.

Mercy Corps' [Safeguarding Core Standards Policy](#) incorporates our minimum requirements for safeguarding into one mandatory policy with application across the entire organization. The Core Standards operationalize our commitments, clarify responsibilities, and ensure that every team member at Mercy Corps – from leadership to programs to operations – understands their role and feels empowered to prevent and respond to exploitation, abuse, harassment and human trafficking. The Policy is accompanied by a comprehensive toolkit of user-tested tools, guidance documents, training content and case studies

The Policy is framed around ten Core Standards, summarized below:



Safeguarding Core Standards

Our Shared Responsibility



| | | | | | |
|----|--|--|----|--|--|
| 01 | | PREVENTION AND RESPONSE ROLES Safeguarding prevention and response roles are in place at the country level | 06 | | SAFE PARTNERSHIPS Partners and contractors are vetted, monitored and supported appropriately on safeguarding |
| 02 | | SAFE RECRUITMENT Safe recruitment processes are in place | 07 | | REPORTING SYSTEMS Reporting systems are trusted, operational, accessible and communicated |
| 03 | | SAFEGUARDING TRAINING All team members receive regular and ongoing safeguarding training | 08 | | SURVIVOR-CENTERED APPROACH Survivors are treated with respect and provided with appropriate, dignified support |
| 04 | | LEADERSHIP COMMITMENT Leadership at all levels demonstrate commitment to safeguarding | 09 | | INVESTIGATIONS Safeguarding investigations are survivor-centered, timely and thorough |
| 05 | | SAFEGUARDING IN PROGRAMS Safeguarding is integrated throughout the program cycle and included in program budgets | 10 | | SAFE COMMUNICATION Images, stories and personal information are gathered, stored and used safely |

Prevention

Safeguarding Prevention and Response Roles (Core Standard 1)

Country level safeguarding prevention roles work with their teams to raise awareness, deliver training, 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.

The Safeguarding Investigations team is supported by our in-country Safeguarding Co-Investigators. Co-Investigators undergo SEAH-specific investigations training and work

under the direction of our headquarters-based investigators, enabling us to manage remote investigations with on-the-ground support.

Safe Recruitment, Hiring, and Onboarding (Core Standard 2)

We are committed to preventing abusers from moving throughout our sector and 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](#) (MDS) a collaborative effort of over 280 peer organizations to prevent known perpetrators of sexual exploitation, abuse, and harassment from moving to different organizations across the sector. In FY25, we completed the rollout of the MDS to across all offices.

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. This interactive training was updated in FY24 and includes modules on our safeguarding and ethics policies. To pass the training course, participants must demonstrate an understanding of expected standards of behavior, reporting obligations, and how to report concerns.

Safeguarding Training and Awareness Raising (Core Standard 3)

Training Mercy Corps team members and partner staff 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. 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. Under the Core Standards, team members must participate in regular face-to-face safeguarding training in addition to completing mandatory annual eLearning courses.

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.

Leadership Commitment (Core Standard 4)

Leaders at the country, regional, and global level play a critical role in setting the direction, dedicating resources, and providing guidance to teams around safeguarding and implementation of the Core Standards. We know organizational culture matters as much as policies and procedures, and that tone begins with leadership. The Core Standards provide guidance for country leaders around ensuring that safeguarding is regularly considered and discussed by senior management teams, integrated in country level risk analysis and its importance communicated by leaders. Country and program leaders receive regular updates on case trends and risks in their regions and annual scenario-based training 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.

Programmatic Mainstreaming (Core Standard 5)

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. Requirements for safeguarding in programs are outlined clearly in the Core Standards, including around program design and budgeting, program level risk assessments and mitigation planning, supervision and staffing, and appropriate vetting and onboarding and monitoring of short-term or “daily workers.” Country offices are supported by Regional Safeguarding Advisors who ensure close technical guidance, and collaboration with other functions such as protection, Social Inclusion and Community Accountability Reporting Mechanisms (CARM).

Vetting, Monitoring, and Supporting Partners and Suppliers (Core Standard 6)

We are committed to being locally led—to intentionally shifting power and decision making to the communities where we operate, and to ensuring that we work with local stakeholders. Our partners⁴ share our commitment to humanitarian principles and safeguarding commitments are embedded in our contractual agreements. The Core Standards clarify processes for partner vetting (due diligence), monitoring, and training. We support to assess their safeguarding systems and processes via our Joint Assessment and Monitoring tool. This process identifies areas where additional support may be 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, in which case the Partner Code of Conduct is added to the partner agreement.

Our Field Procurement Policy and Procedures include due diligence measures to support our Safeguarding Policies, particularly our Anti-Human Trafficking and Exploitation Policy. These include mandatory supplier reference checks with questions related to human trafficking and labor exploitation for all standard tenders, a supplier questionnaire that includes questions on how the supplier assesses risks around human trafficking, 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, including through a short, simple language Supplier Code of Conduct. 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

⁴Partners include 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

Slavery Act 2015. The statement is available on the [Mercy Corps Europe Website](#) and details the steps we take to mitigate the risks of modern slavery within our operations and supply chain.

Safe Communications (Core Standard 10)

We are committed to data protection, privacy, and the safe and ethical gathering and use of images, stories, and videos. While we seek to tell compelling stories to garner support for our work and communicate the circumstances of the communities we serve, we strive to ensure ethical storytelling in all our communications, focusing on images of strength and dignity, while not obfuscating need. Gathering and using images and stories of participants is governed by the same high standards in relation to human rights, safeguarding, and accountability as any other Mercy Corps activity and must be done consistent with our Code of Ethics, Child Safeguarding Policy, and Data Protection Policies. Informed consent, with clear options to decline or withdraw permission, is the cornerstone of our safe content gathering process.

Reporting and Response

Reporting Mechanisms (Core Standard 7)

For community members and program participants, we provide accessible and locally relevant Community Accountability Reporting Mechanisms (CARM)⁵. Locally relevant, contextual CARM systems are operational across our locations and programs. Our global CARM Policy outlines minimum standards for community accountability and clear

⁵ Community Accountability Reporting Mechanisms (CARMs) provide multiple channels 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. Team members may also use CARM channels, in addition to internal reporting mechanisms if they desire.

requirements for partners. 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 several internal reporting channels to ensure that team members have an option for reporting concerns that works for them in their language.⁶ 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 lines⁷ 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, safeguarding team members, or integrity focal points all of whom are required to report immediately to the Integrity Hotline.

Survivor Support (Core Standard 8)

Mercy Corps is committed to ensuring that survivors' rights, wishes, needs, safety, dignity, and well-being are at the center of our safeguarding prevention and response efforts. We align our approach with the Principles of a Victim/Survivor-Centered Approach set forth by the Inter- Agency Standing Committee and the UN Victim's Rights Statement. All survivors are offered support and the opportunity to connect with a survivor-liaison within Mercy Corps who can assist with organizing support outside of any investigative process. Support is never contingent on a survivor's participation in an investigative process and does not end when an investigation concludes. We actively seek survivor feedback to improve our prevention and response efforts and incorporate that feedback into training for our global safeguarding team.

⁶ Community members or participants are welcome to use the Integrity Hotline or other reporting avenues.

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

Incident Response and Investigations (Core Standard 9)

Our headquarters and regionally based investigations team conducts professional, timely, survivor-centered, trauma-informed investigations supported by a network of trained safeguarding Co-Investigators across many Mercy Corps countries of operation.

Response and Incident-Related Data for FY25

In FY25, Mercy Corps received 216 reports alleging safeguarding concerns against Mercy Corps team members, partners, or suppliers.⁸ We issued confidential notifications to donors (and regulators, where appropriate) regarding specific reports in accordance with requirements in our donor agreements and Donor Notification Standard Operating Procedures.

We determined that certain reports did not implicate Mercy Corps' safeguarding policies, did not constitute potential violations of those policies, or were unrelated to Mercy Corps' programs or people.

We determined that 49 reports involved substantiated violations of Mercy Corps' safeguarding policies. All of the substantiated matters resulted in disciplinary action, including employment terminations or terminations of contracts. In all instances, team members whose employment was terminated became ineligible for rehire and partners became ineligible for further awards or future contracts. Former team members' ineligibility status will be shared with prospective employers, including through the MDS (as further described above). In all substantiated reports involving exploitation or abuse of a participant or community member, we terminated the team member's employment or the partner agreement.

All safeguarding reports received in FY25 are closed. We strive to conclude safeguarding investigations within 90 days and we met that goal during FY25. However, we recognize that our survivor-centered approach may necessitate longer investigations on occasion.

⁸ Safeguarding reporting during FY25 was 14% higher than FY24.

In all reports 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 offered and provided included medical, financial, educational, and psycho-social support.

Reflect and Adapt: An Evidence Driven Approach

We strive to be evidence driven. We analyze case data to continuously improve and adapt our prevention and response efforts. We seek input from survivors at the close of each case and integrate recommendations or other qualitative information that they want to provide. Survivor feedback is incorporated into training and prevention measures.

At the end of a safeguarding investigation, we examine the specific conditions that may have made the incident more likely to occur. 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. Following our review, we make recommendations for corrective actions to appropriate internal teams and monitor their implementation. Where a safeguarding concern relates to a partner, we work with partners to support them to identify appropriate corrective actions for their organization.

Our case management system, CaselQ/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. CaselQ/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 regularly review trends and reflect on quantitative and qualitative data at the end of each quarter.

To promote transparency and greater accountability in the sector, Mercy Corps serves as a Steering Committee member for the [SEAH Harmonised Reporting Scheme \(HRS\)](#), launched in FY24. The project is coordinated by the Core Humanitarian Standards (CHS) Alliance and supported by multiple donors with funding provided by the United Kingdom's Foreign, Commonwealth, and Development Office (FCDO). Mercy Corps and over 90 project partners contribute anonymized safeguarding reporting data bi-annually to create detailed aggregated reports shared with the public. This scheme allows us to safely share additional details about our safeguarding allegations, including country location, survivor age and gender, and subject profile. Aggregate reporting enables a comprehensive analysis of trends and patterns in the sector, enhancing our collective understanding of SEAH risks and informing our prevention efforts.

Looking Forward

We recognize that the complex challenges facing our sector and the communities we serve are likely to persist. The heightened vulnerabilities experienced by those we aim to support, coupled with constrained resources and evolving operational landscapes, underscore the critical importance of maintaining our unwavering dedication to safeguarding practices. We remain steadfast in our commitment to upholding the highest ethical standards. Our comprehensive safeguarding framework—including our prevention standards, accessible ethics reporting channels, thorough investigation processes, and survivor-centered support mechanisms—remains robust and responsive. We will continue to prioritize preventative measures, including ongoing training, systematic risk assessment, and proactive mitigation.

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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.

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