

ACKNOWLEDGMENT OF CWS POLICIES

I acknowledge to have read, understood, and to agree with the following policies:

- CWS Volunteer Agreement
- CWS Acceptable Use IT Policy
- CWS Code of Conduct Policy
- CWS Confidentiality Policy
- CWS Anti- Human Trafficking Policy
- CWS Child Safeguarding Policy
- CWS MVR Policy
- CWS Conflict of Interest Policy
- Artificial Intelligence Tools in the Workplace Policy

I am aware that CWS expects me to uphold at all times the standards of behavior described in the aforementioned policies, and I accept the consequences of any violation of any of the provisions under such policies.

Volunteer's Name (please print): _____

Signature: _____ Date: _____

CHURCH WORLD SERVICE AGREEMENT, RELEASE AND WAIVER OF LIABILITY

Church World Service (CWS) is a non-profit organization that works with partners to eradicate hunger and poverty and promote peace and justice around the world. The undersigned will participate as Volunteer for CWS in their _____ office from _____ until _____.

This Agreement, Release and Waiver of Liability executed on _____ (date) by _____ releases CWS and each of its directors, officers, employees, volunteers and agents.

I understand that CWS does not make any promise of future employment or compensation in exchange for my service. As a Volunteer, I am not entitled to receive salary, benefits, or other compensation, and I am not eligible to participate in the CWS' health, disability, or life insurance programs. Furthermore, I am not eligible for workers compensation in the event of illness, injury or death. CWS will not compensate me for any injuries, for time lost from school or work, or for any reason, and I agree that I will not seek any compensation from CWS or any of its directors, officers, employees, agents, and volunteers. If I am injured while serving as CWS Volunteer, it is my responsibility to pay for emergency room care, doctors' services, hospitalization, and any other medical or non-medical services.

I understand that CWS is the sole and exclusive owner of its source documents and any financial, statistical, membership and personal information provided to the volunteer under this agreement. Likewise, CWS is the sole and exclusive owner of its name, logo and other proprietary materials. All files, reports, papers, records and other proprietary materials provided or made available by CWS to me under this Agreement shall at all times remain the sole and exclusive property of CWS and may only be used as authorized by CWS.

As a Volunteer, I agree that all confidential information communicated or provided by CWS pursuant to the work performed under this Agreement and including any confidential information I gain through sources other than CWS, shall be and remain confidential except as specifically authorized by CWS in writing. When in doubt, I shall not disclose any work or document I thought or perceived to be confidential without CWS' written consent.

I grant and convey to CWS all right, title, and interest in any and all photographs, images, video, or audio recordings of me or my likeness or voice made by CWS in connection with my providing internship/volunteer services to CWS.

This volunteer commitment may be terminated by me or CWS at any time for any reason. I voluntarily assume all risks and hazards associated with these volunteer services, whatever those services might ultimately constitute, and that I am releasing CWS and its directors, officers,

employees, agents, and volunteers from any legal liability in the event of illness, injury, death, property damage, or loss, and I waive any claim I may have, now or later, in respect of illness, injury, death, property damage, or loss arising out of or relating to your services as volunteer.

I understand that as part of CWS' process of hiring volunteers, I will be subjected to a criminal background check and that a satisfactory criminal background check is a condition of this volunteer opportunity.

BY SIGNING BELOW, I EXPRESS MY UNDERSTANDING AND INTENT TO ENTER INTO THIS RELEASE AND WAIVER OF LIABILITY WILLINGLY AND VOLUNTARILY.

Volunteer Name (please print): _____

Signature: _____ Date: _____

Address: _____

Phone: _____ E-mail: _____

Witness (please print): _____ Signature: _____

EMERGENCY CONTACT INFORMATION	
Name: _____	Relationship: _____
Address: _____	Phone: _____
Email: _____	

**CHURCH WORLD SERVICE, INC.
Acceptable IT Use Policy**

Title:	Acceptable IT Use Policy
Type:	Management
Reason for Policy:	Best Practice Regulatory Reasons (NIST 853 for DoS awards)
Coverage:	CWS Worldwide (except RSC Africa) Interns
Policy, Procedure and Resource Adjacencies:	Cybersecurity Policy Password Policy Mobile Device Management Policy
Policy Steward:	Senior Director, Information Technology
Reviewed by Prior to Approval:	Director Support Services Director, Cybersecurity, IT Director, Data Administration, IT Staff Operations Leadership Team (SOLT) Chief Financial Officer Vice President, Operations
Approved By:	President and Chief Executive Officer
Frequency of Review:	1 year
Date Approved:	June 2, 2012
Date Reviewed (with no change):	
Implementation Date(s):	June 2, 2012

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1. POLICY

Church World Service (CWS) information and information resources shall be used in an approved, ethical, and lawful manner to avoid loss or damage to CWS operations, image, or financial interests and to comply with the official acceptable use policies and procedures.

2. SCOPE

Each employee, contractor, volunteer, or other user of Church World Service information systems is expected to be familiar with and consistently follow the baseline control measures that this rule defines. These security measures are the minimum controls required to prevent problems like fraud and embezzlement, sabotage, errors and omissions, system unavailability, and various legal problems, such as allegations of negligence, breach of fiduciary duty, and privacy violation.

3. EMPLOYEE TECHNOLOGY ACCEPTABLE USE RULE

The purpose of this policy is to provide CWS employees, contractors, volunteers, and others with guidance on the proper use of CWS' information technology resources, including but not limited to:

- The Internet, the Intranet, e-mail, and other portals
- Electronic devices such as phones, PDAs, tablets, computers, and portable storage.
- Network and supporting systems and the data transmitted by and stored by these systems.
- Social media, blogging, on-line forums, instant messaging, and other such communication vehicles.

The use of CWS technology resources is a privilege granted to employees and others for the enhancement of job-related functions. Employees may have limited access to these resources for personal use, by complying with the provisions of this rule. Violations of this rule may result in the revocation of this privilege. Employees may also face disciplinary action up to and including termination, civil litigation, and/or criminal prosecution for misuse of these resources. Employees are expected to report incidents of misuse or violation of the Acceptable IT Use Policy to their supervisor, the Human Resources Department, or appropriate IT managers.

4. ACCEPTABLE USE GUIDELINES

The specific usage guidelines that follow are not intended to be comprehensive, but rather to establish and clarify the intent of this policy. Situations not enumerated here will inevitably arise, and they should be interpreted according to the spirit of this policy.

5. USER PASSWORDS AND SECURITY

Employees and others with approval to access CWS networks, information systems and resources, computers, and related devices will receive a unique user ID. The accompanying password is not to be shared and should be changed according to organizational and system security standards. Users shall protect their computer systems and accounts by using strong passwords, allowing the installation of anti-virus software consistent with management directives and keeping such software, as well as the operating system and application security patches, up to date. Users are responsible for safeguarding their identification codes and passwords, and for using them only as authorized.

6. SENSITIVE INFORMATION

Employees may not disclose sensitive information to persons not sanctioned to receive it. This includes non-public information such as Social Security numbers, credit card numbers, bank account numbers, refugee information, donor information, and other similar data. All employees who have access to such information shall adhere to all organizational policies and standards as well as other applicable laws and regulations.

7. HARDWARE AND SOFTWARE

ACQUIRING HARDWARE AND SOFTWARE

To prevent the introduction of malicious code and protect the integrity of CWS information resources, hardware and software shall be obtained from official sources. All hardware and software used in an official capacity by CWS staff should also be authorized by appropriate CWS staff.

COMPLYING WITH COPYRIGHT AND LICENSING

All software used on CWS information resources shall be procured in accordance with official CWS policies and procedures, and shall be licensed, and registered in the name of CWS. All employees shall abide by software copyright laws and shall not obtain, install, replicate, or use software except as permitted by the software licensing agreements.

ENCRYPTION

The use of Encrypting software, hardware or attached devices must comply with the following:

- A. Use encryption software and the methods approved by official sources.
- B. Place the key, phrase, or other similar file for all encrypted computer hardware or attached devices in a directory or file system that can be accessed by management personnel.
- C. Supply the key, phrase, or other device needed to decrypt the computer hardware or attached devices upon request by authorized CWS management.

USING PERSONALLY OWNED SOFTWARE

To protect the integrity of the corporate information resources, staff shall not use personally-owned software on CWS information resources without the approval of the supervisor. This approval may be granted on a limited basis.

8. E-MAIL AND MESSAGING

Access to CWS e-mail systems and Internet-based messaging systems are provided to employees and others whose duties require it for conducting CWS business. Since e-mail and instant messages may be monitored, all employees and others using CWS resources for the transmission or receipt of e-mail or instant messages shall have no expectation of privacy.

ACCEPTABLE USE

CWS provides e-mail only for conducting CWS business. Occasional and incidental personal e-mail use shall be permitted if it does not interfere with CWS' ability to perform its mission and meets the conditions outlined in official CWS directives. In addition, personal messages shall be considered to be in the possession and control of CWS as long as these messages remain on any CWS owned or sanctioned electronic device.

PROHIBITED USE

Prohibited activities when using CWS e-mail shall include, but not be limited to, sending or arranging to receive the following:

- A. Information that violates state or federal laws, or official regulations.

- B. Unsolicited commercial announcements or advertising material sent to CWS employees or contacts, unless approved by management in advance.
- C. Any material that may defame, libel, abuse, embarrass, tarnish, present a bad image of, or portray in false light, CWS, the recipient, the sender, or any other person.
- D. Pornographic, harassing, or offensive material, chain letters, unauthorized mass mailings, or malicious code.

AUTHORIZED MONITORING

IT system administrators and other staff with unrestricted access to e-mail and similar services shall receive management approval prior to decrypting or reading the e-mail traffic of other employees.

9. INTERNET AND INTRANET

Access to the Internet and Intranet are available to employees, contractors, volunteers, and others whose duties require it to conduct CWS business. Since Internet and Intranet activities may be monitored, all persons accessing the Internet and Intranet shall have no expectation of privacy.

ACCEPTABLE USE

CWS provides Internet and Intranet access to conduct CWS business. Occasional and incidental personal Internet use shall be permitted if it does not interfere with the work of staff, the CWS' ability to perform its mission, and meets the conditions outlined in official CWS directives.

PROHIBITED USE

Prohibited activities when using the Internet and Intranet include, but are not limited to, the following:

- A. Browsing explicit pornographic or hate-based web sites, hacker or cracker sites, or other sites that CWS has determined to be off-limits.
- B. Posting, sending, or acquiring sexually explicit or sexually oriented material, hate-based material, hacker-related material, or other material determined to be off-limits.
- C. Posting or sending sensitive information outside of CWS except when instructed by, or with the knowledge of, an appropriate authority.

- D. Posting non-CWS related announcements or advertising material.
- E. Promoting or maintaining a personal or private business unless permission is granted officially by CWS management.
- F. Receiving news feeds and push data updates, unless the material is required for CWS business.
- G. Using non-work related applications or software that occupy excess workstation or network processing time (e.g., processing in conjunction with screen savers).

10. GENERALLY PROHIBITED USES OF INFORMATION RESOURCES

Generally prohibited activities when using CWS information resources shall include, but are not limited to, the following:

- a. Stealing electronic files or copying CWS propriety electronic files without permission.
- b. Violating copyright laws.
- c. Browsing the private files or accounts of others, except as provided by appropriate authority.
- d. Performing unofficial activities that may degrade the performance of systems, such as the playing of electronic games or music.
- e. Performing activities intended to circumvent security or access controls of any organization, including the possession or use of hardware or software tools intended to defeat software copy protection, discover passwords, identify security vulnerabilities, and decrypt encrypted files or compromise information security by any other means.
- f. Writing, copying, executing, or attempting to introduce any computer code designed to self-replicate, damage, or otherwise hinder the performance of or access to any CWS computer, network, or information.
- g. Accessing CWS computers via non-authorized means except when instructed by, or with the knowledge of, an appropriate authority.
- h. Bringing discredit to CWS.
- i. Using CWS resources for personal gain.
- j. Using someone else's logon ID and password.

- k. Conducting fraudulent or illegal activities, including but not limited to: gambling, trafficking in drugs or weapons, participating in terrorist acts, or attempting unauthorized entry to any CWS or non-CWS computer.
- l. Endorsing any product or service, lobbying, or participating in any partisan political activity.
- m. Disclosing any corporate information that is not otherwise public.
- n. Performing any act that may defame, libel, abuse, embarrass, tarnish, present a bad image of, or portray in false light, CWS or any CWS employee or contact.

11. CONSEQUENCES

Violation of this policy may result in disciplinary action that may include termination for employees and temporaries; termination of employment relations in the case of contractors or consultants; dismissal for interns and volunteers. Additionally, individuals are subject to loss of CWS Information Resources access privileges, civil, and criminal prosecution.

This policy supersedes all prior corporate actions, including policy, resolutions or other statements, with respect to the subject matter addressed herein.

English Language. *Regardless of the language in which this policy was initially prepared, the English language version of the same, approved in writing by Church World Service, Inc., is deemed the official record of this policy for the purposes of interpretation and implementation. In the event of actual or apparent conflict or ambiguity in interpretation between any expressed provision of the English language version of this policy and the expressed provisions of any non-English language version of the same, the English language version officially approved by Church World Service, Inc. shall control to the extent necessary to resolve such actual or apparent conflict or ambiguity.*

**CHURCH WORLD SERVICE, INC.
Code Of Conduct Policy**

Title:	Code of Conduct
Type:	Board
Reason for Policy:	Contract or Grant Requirements Regulatory Reasons
Coverage ¹ :	CWS Worldwide Board Consultants Contractors Vendors Interns Volunteers
Policy and Procedure Adjacencies:	Anti-Human Trafficking Policy Child Safeguarding Policy Non-Discrimination and Anti-Harassment Policy Non-Discrimination Regarding the Provision of Programs and Services Policy Prevention of Sexual Exploitation and Abuse Policy US Employee Handbook Complaints and Grievances Procedure Accountability to Affected Populations Guidelines
Policy Steward:	Vice President, People and Culture
Reviewed by Prior to Approval:	Senior Director, Human Resources Director, Program Compliance Director, Procurement Senior Child, Protection and Welfare Specialist Senior Director, US Programs Legal Executive Leadership Team Chief of Staff President and Chief Executive Officer Governance Committee
Approved By:	Board
Frequency of Review:	3 years
Date Approved:	February 5, 2011 September 2016 October 26, 2016 March 2022
Date Reviewed (with no change):	
Implementation Date(s):	March 2022

¹ Policies and procedures that apply to consultants, contractors or vendors may be applied directly as CWS policies or, in some cases, by the other party having their own similar policy. This will be specified in written agreements with other parties

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1. INTRODUCTION

Members of the ACT Alliance have a common commitment to prevent sexual exploitation and abuse, fraud and corruption, and abuse of power. As a member of the ACT Alliance, CWS is responsible for upholding and promoting the highest ethical and professional standards in its work.

The CWS management has a responsibility to ensure that all staff are aware of this Code of Conduct, that they understand what it means in concrete behavioral terms and how it applies to their program context. Dissemination of this Code is supported by two CWS guidance documents, namely, these guidelines² and the ACT Guidelines for Complaints Handling and Investigations (2010).

Annex B provides definitions of key terms used in this policy document.

2. PURPOSE

The main purpose of the CWS Code of Conduct is to promote greater accountability among the people with whom we work in our humanitarian and development programs. The Code seeks to protect staff as well as every adult and child with whom we work from abuse by individuals or groups from within CWS and its partners. The Code is intended to serve as a guide for CWS staff to make ethical decisions in their professional lives and at times in their private lives.

3. SCOPE

The CWS Code of Conduct applies to all CWS staff, including temporary personnel such as consultants and volunteers who work in CWS programs. The term “staff” will be used hereinafter in this document for all full-time and temporary CWS personnel.

All CWS offices are encouraged to promote the spirit and principles of the CWS Code of Conduct among their partner organizations.

The Code of Conduct shall be signed yearly by all CWS staff. All staff are responsible for ensuring that the Code is complied with.

4. CWS CODE OF CONDUCT

The CWS Code of Conduct outlines the key responsibilities of all CWS staff in relation to respect for the welfare and rights of the people with whom they work in the

² This document is an adaptation of the revision of the December 2008 ACT International “Guidelines for compliance and complaints mechanisms - code of conduct on sexual exploitation, abuse of power and corruption for staff members of the ACT International Alliance”.

development and humanitarian context. The Code is designed to assist staff to better understand the obligations placed upon their conduct, as to prevent the following: Sexual Exploitation and Abuse (SEA), all forms of harassment, fraud and corruption, security breaches, conflict of interest, and unethical business practices.

Therefore, all CWS staff shall at all times:

- Respect and promote fundamental human rights³ without discrimination.
- Treat all communities with whom we work -- including crisis-affected populations, Internally Displaced Persons (IDPs) and refugees -- fairly and with respect, courtesy, dignity and according to International Laws and Standards.⁴
- Promote the implementation of the CWS Code of Conduct by contributing towards the creation and maintenance of an environment that prevents sexual exploitation and abuse, abuse of power and corruption.
- Report immediately any knowledge, concerns or substantial suspicions of breaches of the Code to her/his line manager and/or senior management of the CWS office or department (or following procedures established by complaints mechanisms), who is expected to take prompt investigative action.
- Be aware that knowingly withholding, or failure to disclose, information about any reports, concerns or substantial suspicions of breaches of this Code of Conduct constitutes grounds for disciplinary measures, up to and including termination.
- Feel protected by CWS's commitment to providing a safe environment through which to voice a concern, without fear of reprisal or unfair treatment as articulated in the CWS Complaints Policy and Disciplinary Procedures 2010.
- Uphold the highest standards of accountability⁵, efficiency, competence, integrity and transparency in the provision of goods and services in the execution of their job.
- When requested, cooperate with any investigation into alleged breaches related to this Code.

³ As set out, for example, in the Universal Declaration of Human Rights, 1948.

⁴ Standards include for example the Code of Conduct for The International Red Cross and Red Crescent Movement and NGOs in Disaster Relief and the Sphere Standards (<http://www.sphereproject.org/>)

⁵ This includes professional conduct in relations to accountable and transparent organization procedures in relation to finances, governance, and management as well as adhering to international standards such as those noted in footnote 4 above.

4.1 SEXUAL EXPLOITATION AND ABUSE⁶

Sexual exploitation and abuse is one form of Gender-Based Violence. CWS recognizes that Sexual Exploitation and Abuse can occur in any development or humanitarian setting. In humanitarian crises, however, the dependency of affected populations on humanitarian agencies for their basic needs creates an additional ethical responsibility and duty of care on the part of all CWS staff.

To protect CWS stakeholders in all situations, CWS staff shall while on duty and off duty:

- Understand that sexual exploitation and abuse by staff involved in development and humanitarian work constitute gross misconduct and are therefore grounds for immediate termination of employment.⁷
- Never engage in any sexual activity with children (persons under the age of 18) regardless of the age of majority or age of consent locally. Sexual activity with children is prohibited within CWS. Mistaken belief in the age of a child is not a defense.
- Not accept, solicit or engage in the "buying" of or profiting from sexual services. This is applicable to CWS staff both within and outside of working hours.
- Never exploit the vulnerability of any target group in the context of development and humanitarian work or allow any person/s to be put into compromising situations.
- Know that the exchange of money, employment, goods or services for sex, including sexual favors or forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to beneficiaries.
- Never abuse a position to withhold development or humanitarian assistance, or give preferential treatment, in order to solicit sexual favors, gifts, payments of any kind, or advantage.

⁶ See ACT Guidelines on the prevention of SEA 2008, revised 2010. For tools and resources in support of prevention of SEA.

⁷ In countries where it is a legal obligation to report allegations of child abuse or sexual assault to the national police, CWS management should take into consideration whether, how and when to inform national authorities.

- Given the increased vulnerability of populations in crisis situations, staff are prohibited from engaging in sexual relationships with members of crisis-affected populations since such relationships are based on inherently unequal power dynamics and undermine the credibility and integrity of humanitarian aid work.
- When working with children, avoid actions or behaviors which may constitute poor practice and never act in ways that may place a child at risk of abuse. (Adhere to CWS Child Safe-guarding Policy.)
- In countries in which CWS undertakes long-term development work, an employee who engages in a long-term sexual relationship with a member of the community which is benefiting from a CWS program, and/or with another employee, is encouraged to inform his or her manager about the relationship to prevent the perception of a conflict of interest.

CWS promotes the integration of a gender-sensitive perspective into efforts to effectively prevent and respond to sexual abuse and exploitation.

4.2 HARASSMENT

CWS staff shall never commit any act or form of harassment as it results in physical, sexual or psychological harm or suffering to individuals. CWS does not tolerate any form of workplace violation such as harassment (including sexual, gender and racial harassment), bullying and discrimination, that is, any unwelcome comment or behavior that is offensive, demeaning, humiliating, derogatory, or any other inappropriate behavior that fails to respect the dignity of an individual.

Therefore, all CWS Staff shall:

- Treat everyone with dignity and respect in the workplace. Speak with civility and kindness, listen carefully, and consider others' wellbeing.⁸
- Never commit any act or form of harassment as it causes physical, sexual, psychological or emotional harm or suffering to individuals.
- Never engage in any behavior, deliberate or otherwise, that makes the recipient feel persecuted, vulnerable and powerless.
- Understand what constitutes harassment, recognize early signs of sexual,

⁸ This includes communities with whom CWS works.

gender and racial harassment (among others) and take swift action to prevent and resolve.

- Understand what constitutes bullying, empower staff that are affected by it, develop strategies for reducing and stopping it, and take necessary disciplinary action against those found to have committed an act or form of harassment.
- Violent, harassing or discriminatory behavior of any kind directed toward another person in the workplace or in the communities with which CWS works is unacceptable and shall not be tolerated.

4.3 ROMANTIC RELATIONSHIP IN THE WORKPLACE

CWS strongly believes that a work environment where employees maintain clear boundaries between employee personal and business interaction is most effective for conducting business and enhancing productivity. Although this Code of Conduct does not prevent the development of friendships or romantic relationships between co-workers, it does establish boundaries as to how relationships are conducted during working hours and within the working environment.

Under no circumstances may an employee be involved in a romantic or sexual relationship with a client currently receiving services from CWS. Employees are prohibited from dating clients and may be disciplined for such actions, up to and including termination of employment.

An employee who is involved in a romantic relationship with another employee may not occupy a position in the same department as, work directly for or supervise the employee with whom he or she is involved.

CWS reserves the right to take prompt action if an actual or potential conflict of interest arises concerning individuals who engage in personal, romantic or sexual relationship that may affect the terms and conditions of employment. Supervisors and managers are prohibited from dating subordinates and may be disciplined for such actions, up to and including termination of employment.

When a conflict or the potential for conflict arises because of a romantic relationship between employees, even if there is no line of authority or reporting involved, the employees may be separated by reassignment, or terminated from employment. If such a personal relationship between employees develops, it is the responsibility and obligation of the employees involved to disclose the existence of the relationship to the department director, manager or human resources.

When a conflict or a potential for conflict affecting terms and conditions of employment arises because of the relationship, the individuals concerned will be given the opportunity to decide who is to be transferred to another position, or terminated, if no position is available. If no decision is made within 30 calendar days of the offer to resolve the situation, CWS will determine who is to be transferred or, if necessary, terminated from employment.

4.4 FRAUD AND CORRUPTION

CWS has a zero-tolerance approach to fraud and corruption as articulated in its 2009 Anti- Fraud and Corruption Policy (see Annex B for definitions). CWS staff shall never take advantage of their position when working with communities, partners or other CWS stakeholders. Therefore, CWS staff shall:

- Promote a culture of honesty and openness among CWS staff and management.
- Be transparent in all work-related financial transactions.
- Never steal, misuse or misappropriate funds or property, ensuring that financial and other resources are used solely for the intended purposes. This applies also to any other income generated such as any interest received/earned on the funds.
- Protect all information accessed during the course of their employment with CWS and comply with all controls established by CWS regarding use of information.
- Avoid disclosure of confidential information to unauthorized persons without appropriate consent of CWS except as permitted under applicable CWS policy and/or Federal, State and Local laws.
- Never engage in “non-arms length transactions”,⁹ document or check forgery, money laundering, taking of commissions and influencing tender process for improper benefit and theft.

⁹ The arm's length principle is the condition or the fact that the parties to a transaction are independent and on an equal footing. Such a transaction is known as an "arm's-length transaction".

- Create a work environment in which communities and staff can safely and confidentially raise and report all serious concerns about suspected fraud and corruption.
- Never knowingly support individuals or entities involved in illegal activities.
- Never deliberately destroy, falsify, alter or conceal evidence material to an investigation or make false statements to investigators in order to materially influence or impede investigations into corrupt, fraudulent, coercive or collusive allegations.
- Conduct all business in accordance with internationally accepted practices and procedures and uphold the highest standards of accountability and transparency in relations to finances, management and governance, where relevant.

4.5 UNETHICAL BUSINESS PRACTICES

CWS promotes moral and ethical business practices. Therefore all CWS staff shall:

- Always follow transparent, accountable and honest practices when receiving cash donations from the public ear-marked for humanitarian or development purposes.
- Never use or accept a bribe in the form of money, goods and or services to secure a contract for services when dealing with suppliers in any development or humanitarian work.
- Never take part in activities that generate personal, organizational or collective profit such as buying or selling when such activities may affect or appear to affect CWS' credibility or integrity.
- Never share in the profits or budget leftovers as kick backs, cuts or discounts for personal or organizational benefits.
- Declare any known or potential conflicts of interest to their employer (e.g. direct relationship with service providers, vendors or suppliers of goods for CWS program).
- Never accept any gifts or other favors that may influence the performance of staff functions or duties. Gifts are defined as, but not limited to: services, travel, entertainment, material goods, among others. In order to respect

national and local traditions and conventional hospitality, minor token gifts such as pens, calendars, desk diaries, etc. can be accepted.

- Never use illegal labor, child labor and forced labor in any work area.
- Always pay compulsory State taxes and comply with national business law and international standards.
- Always strive for the highest health, safety and environmental standards in all program work.
- Ensure, where possible, that goods purchased are produced and delivered under conditions that do not involve the abuse or exploitation of any persons and have the least negative impact on the environment.
- Never use or distribute known unsafe products or supplies in any development or humanitarian setting.

4.6 SECURITY BREACHES

CWS places the security and safety of all staff and those with whom we work as a top priority and will strive to do all that it reasonably can to ensure that staff are secure as they go about their work. Security is an individual as well as an organizational responsibility, therefore all CWS staff shall:

- Adhere to the CWS security principles and guidelines.¹⁰
- Never use or possess weapons or ammunition of any kind while on duty.¹¹
- Never drive a vehicle while under the influence of alcohol or any illegal substance and comply with the laws of the country in which they are working in relation to both.

5. COMPLAINTS AND DISCIPLINARY PROCEDURES

Violation of this Code of Conduct will not be tolerated and may, in accordance with relevant legislation, lead to internal disciplinary actions, dismissal or even criminal

¹⁰ For guidance, please refer to the Security Handbook, and the complementary Principles of Safety and Security.

¹¹ In exceptional cases of high insecurity, CWS staff may contract external security services that are armed. It is expected however that regular CWS house guards with individual CWS contracts are unarmed CWS personnel.

prosecution.

Each staff member of CWS has a responsibility to handle and respond to any allegations of misconduct received from stakeholders. CWS has established systems for investigating, recording and dealing with misconduct. Complaints are investigated promptly, while maintaining discretion and confidentiality and protecting the rights of all individuals involved. Breaches of the Code of Conduct shall be reported immediately to senior management.

Those who wish to lodge a complaint about an alleged breach of the Code by a member of CWS staff should lodge their complaint as soon as possible after s/he becomes aware of the concern.

The complaint may be lodged through the following:

Email: ComplianceHotline@cwsglobal.org
USA and Canada (English): 855-670-0080
USA and Canada (Spanish): 800-216-1288
Canada (French): 855-725-0002
Mexico (Spanish): 01-800-681-5340
All other countries: 800-603-2869 (must dial country access code first.
[Click here](#) for access codes and dialing instructions)
Via Web: www.lighthouse-services.com/cwsglobal

Toll-free numbers and additional country-specific links are available on Annex A.

Any CWS staff person purposely making false accusations about any action by another CWS staff which is in breach of the Code of Conduct will be subject to disciplinary action, up and including termination of employment.

ANNEX A



- Primary Website: www.lighthouse-services.com/cwsglobal

Language Abbreviation	Language Name	Direct URL
ara	Arabic	www.lighthousegoto.com/cwsglobal/ara
ben	Bengali	www.lighthousegoto.com/cwsglobal/ben
csm	Chinese (Simplified)	www.lighthousegoto.com/cwsglobal/csm
ctr	Chinese (Traditional)	www.lighthousegoto.com/cwsglobal/ctr
cze	Czech	www.lighthousegoto.com/cwsglobal/cze
dan	Danish	www.lighthousegoto.com/cwsglobal/dan
dut	Dutch	www.lighthousegoto.com/cwsglobal/dut
eng	English	www.lighthousegoto.com/cwsglobal/eng
fil	Filipino	www.lighthousegoto.com/cwsglobal/fil
fin	Finnish	www.lighthousegoto.com/cwsglobal/fin
fre	French	www.lighthousegoto.com/cwsglobal/fre
geo	Georgian	www.lighthousegoto.com/cwsglobal/geo
ger	German	www.lighthousegoto.com/cwsglobal/ger
gre	Greek	www.lighthousegoto.com/cwsglobal/gre
heb	Hebrew	www.lighthousegoto.com/cwsglobal/heb
hin	Hindi	www.lighthousegoto.com/cwsglobal/hin
hun	Hungarian	www.lighthousegoto.com/cwsglobal/hun
ind	Indonesian	www.lighthousegoto.com/cwsglobal/ind
ita	Italian	www.lighthousegoto.com/cwsglobal/ita
jpn	Japanese	www.lighthousegoto.com/cwsglobal/jpn
kor	Korean	www.lighthousegoto.com/cwsglobal/kor
lav	Latvian	www.lighthousegoto.com/cwsglobal/lav
may	Malay	www.lighthousegoto.com/cwsglobal/may
nor	Norwegian	www.lighthousegoto.com/cwsglobal/nor
pol	Polish	www.lighthousegoto.com/cwsglobal/pol
por	Portuguese	www.lighthousegoto.com/cwsglobal/por
rum	Romanian	www.lighthousegoto.com/cwsglobal/rum
rus	Russian	www.lighthousegoto.com/cwsglobal/rus

slo	Slovak	www.lighthousegoto.com/cwsglobal/slo
som	Somali	www.lighthousegoto.com/cwsglobal/som
spa	Spanish	www.lighthousegoto.com/cwsglobal/spa
swe	Swedish	www.lighthousegoto.com/cwsglobal/swe
tha	Thai	www.lighthousegoto.com/cwsglobal/tha
tur	Turkish	www.lighthousegoto.com/cwsglobal/tur
ukr	Ukrainian	www.lighthousegoto.com/cwsglobal/ukr
vie	Vietnamese	www.lighthousegoto.com/cwsglobal/vie

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- French speaking Canada: **855-725-0002**
- Spanish speaking Mexico: **01-800-681-5340**

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- **All other countries: 800-603-2869** (must dial country access code first [click here](#) for access codes and dialing instructions)

- **E-mail:** reports@lighthouse-services.com (must include company name with report)
- **Fax:** (215) 689-3885 (must include company name with report)

ANNEX B: KEY TERMS AND DEFINITIONS

Abuse of power. Abuse of power includes any abusive behavior (physical, psychological, sexual or emotional) by a person in a position of authority and trust against someone in a position of vulnerability and/or dependency.

Bullying. Is aggression expressed psychologically and emotionally rather than physically. The term is used to describe a repeated pattern of negative, intrusive, violating behavior against one or more targets and comprises constant trivial fault-finding criticism, refusal to value and acknowledge, undermining, discrediting and a host of other behaviours.¹²

Complainant. The person making the complaint, including the alleged survivor of the sexual exploitation and abuse or another person who becomes aware of the wrongdoing.

Discrimination. Discrimination means exclusion of, treatment of, or action against an individual based on social status, race, ethnicity, color, religion, gender, sexual orientation, age, marital status, national origin, political affiliation or disability.

Corruption. Is the “offering, giving, soliciting or acceptance of an inducement or reward which may improperly influence the action of any person”

Fraud. Is an intentional distortion, deceit, trickery, and perversion of truth or breach of confidence, relating to an organization’s financial, material, or human resources, assets, services and/or transaction, generally for the purpose of personal gain or benefit. Fraud is a criminal deception or the use of false representations to gain an unjust advantage.

Harassment. Harassment means any unwelcome comment or behavior that is offensive, demeaning, humiliating, derogatory, or any other inappropriate behavior that fails to respect the dignity of an individual. Harassment can be **committed by** or **against** any member of the community with whom we work, partners, employee, vendor or other individual visiting or doing business with an agency (see definition of sexual harassment further below).

Minor. A person under age 18 (a child according to the definition in the Convention for the Rights of the Child).

Gender based violence (GBV). “Any harm that is perpetrated against a person's will; that has a negative impact on the physical or psychological health, development, and identity of the person; and that is the result of gendered power inequities that exploit distinctions between males and females, among males and among females. Although not exclusive to

¹² Adapted from <http://www.bullyonline.org/workbully/mobbing.htm> - website of the National UK Workplace bullying advice line

women and girls, GBV principally affects them across all cultures. Violence may be physical, sexual, psychological, economic, or socio-cultural.”¹³ Gender-based violence may manifest in numerous ways: domestic violence, battering, rape and marital rape, female genital mutilation, torture, trafficking, and forced prostitution, dowry-related violence, marriage and in certain cases, violence perpetrated or condoned by the state.

Sexual abuse. Sexual abuse is action or threatened physical intrusion of a sexual nature, including inappropriate touching, by force or under unequal or coercive conditions.

Sexual exploitation. Sexual exploitation means any action or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, sexually or politically from the sexual exploitation of another (UN SG Bulletin, 9 October 2003). In these situations, the potential victim believes she/he has no other choice than to comply; this is not consent and it is exploitation. Some examples include, but are not limited to:

- Humanitarian/development worker demanding (or accepting) sex in exchange for material assistance, favors, or privileges.
- Teacher insisting on (or accepting) sex in exchange for passing grade or admission to class.
- Refugee leader demanding (or accepting) sex in exchange for favors or privileges.
- Security worker insisting on (or accepting) sex in exchange for safe passage.
- Driver demanding (or accepting) sex to give a female person a seat in the vehicle.

Exploitation is using one’s position of authority, influence or control over resources, to pressure, force or manipulate someone to do something against their will or unknowingly, by threatening them with negative repercussions such as withholding project assistance, not approving an employee’s work support requests, threatening to make false claims about an employee in public, etc.

Sexual harassment. Sexual harassment means any unwelcome sexual advance, comment, expressed or implied sexual demand, touch, joke, gesture, or any other communication or conduct of a sexual nature, whether verbal, written or visual, by any person to another individual within the scope of work. Sexual harassment may be directed at members of the same or opposite sex and includes harassment based on sexual orientation. Sexual harassment can occur between any one or more individuals, employee or beneficiary, regardless of their work relationship.

¹³ Ward, Jeanne. (2002). *If Not Now, When? Addressing Gender-Based Violence in Refugee, Internally Displaced and Post-Conflict Settings*. New York: The Reproductive Health in Conflict Consortium.

Subject of the complaint. The person alleged to have perpetrated the misconduct in the complaint (BSO/HAP)

Survivor or victim. The person who is, or has been, sexually exploited or abused. This term implies strength, resilience and the capacity to survive (BSO/HAP).

Protection. Ensuring that individual basic human rights, welfare and physical security are recognized, safeguarded and protected in accordance with international standards.

Workplace violence. Any incident in which a person is abused, threatened or assaulted in circumstances relating to their work. These behaviors would originate from customers, co-workers at any level of the organization. This definition would include all forms of harassment, bullying, intimidation, physical threats/assaults, robbery and other intrusive behaviors (ILO).

This action supersedes all prior corporate actions, including policy, resolutions or other statements, with respect to the subject matter addressed herein.

English Language. *Regardless of the language in which this policy was initially prepared, the English language version of the same, approved in writing by Church World Service, Inc., is deemed the official record of this policy for the purposes of interpretation and implementation. In the event of actual or apparent conflict or ambiguity in interpretation between any expressed provision of the English language version of this policy and the expressed provisions of any non-English language version of the same, the English language version officially approved by Church World Service, Inc. shall control to the extent necessary to resolve such actual or apparent conflict or ambiguity.*

**CHURCH WORLD SERVICE, INC.
Confidentiality Policy**

Title:	Confidentiality Policy
Type:	Board
Reason for Policy:	Best Practice Regulatory Reasons
Coverage ¹ :	CWS Worldwide Board Consultants Contractors Interns Vendors
Policy and Procedure Adjacencies:	US Employee Handbook Code of Conduct
Policy Steward:	Vice President, People and Culture
Reviewed by Prior to Approval:	Senior Director, Human Resources Director, Program Compliance Senior Director, Information Technology Legal Executive Leadership Team Chief of Staff President and Chief Executive Officer Governance Committee
Approved By:	Board
Frequency of Review:	3 years
Date Approved:	May 1, 2014
Date Reviewed (with no change):	
Implementation Date(s):	May 1, 2014

¹ Policies and procedures that apply to consultants, contractors or vendors may be applied directly as CWS policies or, in some cases, by the other party having their own similar policy. This will be specified in written agreements with other parties.

It is the policy of Church World Service that board members, staff and volunteers of Church World Service will not disclose confidential information belonging to or obtained through their affiliation with Church World Service to any person, including their relatives, friends, and business and professional associates, unless Church World Service has authorized disclosure. This policy is not intended to prevent disclosure where disclosure is required by law.

Board members, staff and volunteers are cautioned to demonstrate professionalism, good judgment, and care to avoid unauthorized or inadvertent disclosures of confidential information and should, for example, refrain from leaving confidential information contained in documents or on computer screens in plain view.

Failure to adhere to this policy will result in discipline, up to and including separation of employment or service with Church World Service.

Upon separation of employment and at the end of a board member's term, he or she shall return all documents, papers, and other materials that may contain confidential information.

1. **PRINCIPLES.**

The following principles govern confidentiality at Church World Service:

- Documents and files (both electronic and hardcopy) containing confidential information are to be accessed, used, and disclosed only with authorization and only on a need-to-know basis for either a staff's job functions or volunteer's service.
- All Board members, staff and volunteers have a duty to use available physical, technological, and administrative safeguards, in accordance with Church World Service policies and procedures, to protect the security of all confidential information in whatever form or medium.

2. **DEFINITIONS.**

Confidentiality. Is the preservation of CWS proprietary information/data; and any other information for which access, use, or disclosure is not authorized by: 1) federal, state, or local law; or 2) CWS policy or operations. By necessity personal and private information is disclosed in a professional working relationship.

Confidential Information. Includes but is not limited to: any personally-identifiable records, financial records (including social security and credit card numbers), and health records in accordance with HIPPA and other appropriate regulations; contracts;

donor, refugee and immigration records; personnel records other than an individual's own personnel records; CWS internal and non-public financial data; computer passwords and other privileged information.

Authorization. Is provided through appropriate management and governance structures and in accordance with established protocols.

This action supersedes all prior corporate actions, including policy, resolutions or other statements, with respect to the subject matter addressed herein.

English Language. *Regardless of the language in which this policy was initially prepared, the English language version of the same, approved in writing by Church World Service, Inc., is deemed the official record of this policy for the purposes of interpretation and implementation. In the event of actual or apparent conflict or ambiguity in interpretation between any expressed provision of the English language version of this policy and the expressed provisions of any non-English language version of the same, the English language version officially approved by Church World Service, Inc. shall control to the extent necessary to resolve such actual or apparent conflict or ambiguity.*

**CHURCH WORLD SERVICE, INC.
Anti-Human Trafficking Policy**

Title:	Anti-Human Trafficking Policy
Type:	Board
Reason for Policy:	Best Practice Contract and Grant Requirements
Coverage ¹ :	CWS Worldwide Affiliates Consultants Contractors Interns Partners Sub-Grantees Vendors
Policy and Procedure Adjacencies:	Complaints and Grievance Procedure
Policy Steward:	Vice President, People and Culture
Reviewed by Prior to Approval:	Senior Director, Human Resources Director, Program Compliance Legal Governance Committee
Approved By:	Board
Frequency of Review:	3 Years
Date Approved:	January 19, 2017
Date Reviewed (with no change):	
Implementation Date(s):	January 19, 2017

¹ Policies and procedures that apply to affiliates, consultants, contractors, partners, sub-grantees, vendors or volunteers may be applied directly as CWS policies or, in some cases, by the other party having their own similar policy. This will be specified in written agreements with other parties.

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1. **PURPOSE**

Church World Service (CWS) commits to a work atmosphere that is free from human trafficking and slavery, which for purposes of this policy, includes forced labor and unlawful child labor. CWS will not tolerate or support human trafficking or slavery in any part of our global organization. This policy is consistent with CWS Code of Conduct and our core values to protect and advance human dignity and human rights in our global humanitarian efforts.

CWS employees, contractors, subcontractors, vendors, suppliers, partners and others through whom CWS conducts business must avoid involvement in any practice that constitutes trafficking in persons or slavery.

2. **SCOPE**

This Policy applies to all personnel working with or engaged to provide services to CWS, including, but not limited to, CWS' employees, officers, board members temporary employees, contingent workers (including agency workers), interns, volunteers, and independent contractors (for ease of reference throughout this Policy, "employees").

Every CWS employee is held responsible for reading, understanding and complying with this Policy.

CWS managers are held responsible for ensuring that employees who report to them, directly or indirectly, comply with this Policy and complete any required trainings.

If you have any questions or concerns relating to this Policy, consult the CWS Human Resources or your supervisor. If you learn of any conduct that you believe may violate this Policy, report it immediately by any of the means listed under the heading "Policy Compliance" below.

3. **POLICY STATEMENT**

3.1 CWS prohibits trafficking in persons and slavery. CWS employees must avoid involvement in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons;
- Procuring commercial sex acts;
- Using forced labor in the performance of any work;
- Destroying, concealing, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of candidates

or offering of employment/contract positions; such as failing to disclose, in a format and language accessible to the potential candidate, basic information or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if provided by CWS), any significant cost to be charged to the candidate, and, if applicable, the hazardous nature of the work;

- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charging applicants/candidates recruitment fees;
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment;
- If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards; or
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing.

3.2 CWS has undertaken actions, and is committed to maintaining and improving its systems and processes, to eliminate human trafficking and slavery.

3.3 CWS requires its administered and affiliate offices to monitor all applicable laws and conduct business in an ethical and responsible manner.

3.4 CWS makes ongoing efforts to verify, evaluate, promote awareness about, and address risks associated with forced labor and human trafficking in its programs and processes.

Evaluating and Addressing Risks. CWS has incorporated by reference the Code of Conduct into its standard contractor and subcontractor agreements. CWS also participates in development and humanitarian efforts to increase awareness of human trafficking.

Monitoring CWS Administered Offices and Offiliates. CWS monitors its administered offices and affiliates based on the Code of Conduct and also reviews the monitoring results for these offices.

Accountability Standards. CWS upholds accountability standards and procedures for employees, contractors, subcontractors, vendors, suppliers and others who fail to meet CWS Code of Conduct.

Training. CWS provides training on this policy to employees.

4. INVESTIGATIONS

Any reported allegations of human trafficking and slavery will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. All CWS employees interviewed during the investigation are required to fully and promptly cooperate with CWS investigators and must respond fully and truthfully to their questions, request for information, and documents. Any failure by the employee to completely cooperate, or any action to delay an investigation, including hiding or destroying any information or documentation, providing false statements or information, or deleting email or other documents, may be subject to disciplinary action, up to and including termination of employment.

5. POLICY COMPLIANCE

Report any conduct that you believe to be a violation of this Policy. Employees who fail to report actual or alleged misconduct may be deemed in violation of this Policy as permitted by applicable law.

The complaint may be lodged through the following:

Email: ComplianceHotline@cwsglobal.org

USA and Canada (English): 855-670-0080

USA and Canada (Spanish): 800-216-1288

Canada (French): 855-725-0002

Mexico (Spanish): 01-800-681-5340

All other countries: 800-603-2869 (must dial country access code first.

[Click here](#) for access codes and dialing instructions)

Via Web: www.lighthouse-services.com/cwsglobal

Toll-free numbers and additional country-specific links are available on Annex A.

Any CWS staff person purposely making false accusations about any action by another CWS staff which is in breach of the Code of Conduct will be subject to disciplinary action, up and including termination of employment.

CWS will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to validate the report.

Any violation of this Policy may be grounds for disciplinary action, up to and including termination, subject to applicable law. Violation of applicable laws may also result in criminal prosecution of responsible individuals.

ANNEX A



- Primary Website: www.lighthouse-services.com/cwsglobal

Language Abbreviation	Language Name	Direct URL
ara	Arabic	www.lighthousegoto.com/cwsglobal/ara
ben	Bengali	www.lighthousegoto.com/cwsglobal/ben
csm	Chinese (Simplified)	www.lighthousegoto.com/cwsglobal/csm
ctr	Chinese (Traditional)	www.lighthousegoto.com/cwsglobal/ctr
cze	Czech	www.lighthousegoto.com/cwsglobal/cze
dan	Danish	www.lighthousegoto.com/cwsglobal/dan
dut	Dutch	www.lighthousegoto.com/cwsglobal/dut
eng	English	www.lighthousegoto.com/cwsglobal/eng
fil	Filipino	www.lighthousegoto.com/cwsglobal/fil
fin	Finnish	www.lighthousegoto.com/cwsglobal/fin
fre	French	www.lighthousegoto.com/cwsglobal/fre
geo	Georgian	www.lighthousegoto.com/cwsglobal/geo
ger	German	www.lighthousegoto.com/cwsglobal/ger
gre	Greek	www.lighthousegoto.com/cwsglobal/gre
heb	Hebrew	www.lighthousegoto.com/cwsglobal/heb
hin	Hindi	www.lighthousegoto.com/cwsglobal/hin
hun	Hungarian	www.lighthousegoto.com/cwsglobal/hun
ind	Indonesian	www.lighthousegoto.com/cwsglobal/ind
ita	Italian	www.lighthousegoto.com/cwsglobal/ita
jpn	Japanese	www.lighthousegoto.com/cwsglobal/jpn
kor	Korean	www.lighthousegoto.com/cwsglobal/kor
lav	Latvian	www.lighthousegoto.com/cwsglobal/lav
may	Malay	www.lighthousegoto.com/cwsglobal/may
nor	Norwegian	www.lighthousegoto.com/cwsglobal/nor
pol	Polish	www.lighthousegoto.com/cwsglobal/pol
por	Portuguese	www.lighthousegoto.com/cwsglobal/por
rum	Romanian	www.lighthousegoto.com/cwsglobal/rum
rus	Russian	www.lighthousegoto.com/cwsglobal/rus
slo	Slovak	www.lighthousegoto.com/cwsglobal/slo
som	Somali	www.lighthousegoto.com/cwsglobal/som
spa	Spanish	www.lighthousegoto.com/cwsglobal/spa
swe	Swedish	www.lighthousegoto.com/cwsglobal/swe
tha	Thai	www.lighthousegoto.com/cwsglobal/tha
tur	Turkish	www.lighthousegoto.com/cwsglobal/tur
ukr	Ukrainian	www.lighthousegoto.com/cwsglobal/ukr
vie	Vietnamese	www.lighthousegoto.com/cwsglobal/vie

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 - Spanish speaking USA and Canada: **800-216-1288**
 - French speaking Canada: **855-725-0002**
 - Spanish speaking Mexico: **01-800-681-5340**
 - **AT&T USA Direct**
 - **All other countries: 800-603-2869**
(must dial country access code first [click here](#) for access codes and dialing instructions)
- **E-mail:** reports@lighthouse-services.com (must include company name with report)
- **Fax:** (215) 689-3885 (must include company name with report)

This action supersedes all prior corporate actions, including policy, resolutions or other statements, with respect to the subject matter addressed herein.

English Language. *Regardless of the language in which this policy was initially prepared, the English language version of the same, approved in writing by Church World Service, Inc., is deemed the official record of this policy for the purposes of interpretation and implementation. In the event of actual or apparent conflict or ambiguity in interpretation between any expressed provision of the English language version of this policy and the expressed provisions of any non-English language version of the same, the English language version officially approved by Church World Service, Inc. shall control to the extent necessary to resolve such actual or apparent conflict or ambiguity.*

**CHURCH WORLD SERVICE, INC.
Child Safeguarding Policy**

Title:	Child Safeguarding Policy
Type:	Management
Reason for Policy:	Best Practice Regulatory Reasons Contract or Grant Requirements
Coverage ¹ :	CWS Worldwide Affiliates Contractors Consultants Interns Partners Sub-Grantees Vendors Volunteers
Policy, Procedure and Resource Adjacencies:	Anti-Human Trafficking Policy Code of Conduct Policy Prevention of Sexual Exploitation and Abuse Policy US Employee Handbook Administration of the Complaints and Grievance Mechanism Procedure
Policy Steward:	Vice President, People and Culture
Reviewed by Prior to Approval:	Senior Director, Human Resources Senior Child Protection and Welfare Specialist Senior Director, Childrens Services Senior Director, US Programs Director, Program Compliance Chief Financial Officer Legal
Approved By:	President and Chief Executive Officer
Frequency of Review:	3 years
Date Approved:	October 26, 2016
Date Reviewed (with no change):	
Implementation Date(s):	October 26, 2016

¹ Policies and procedures that apply to affiliates, consultants, contractors, partners, sub-grantees, vendors or volunteers may be applied directly as CWS policies or, in some cases, by the other party having their own similar policy. This will be specified in written agreements with other parties

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1. INTRODUCTION

Church World Service has developed this Child Safeguarding Policy in order to strengthen its mechanisms for the protection of affected populations and to minimize the risk of harm to children who come into contact with those employed by, or who are associated with, CWS. This policy complements, but does not replace, the CWS Code of Conduct, as well as the broader codes and policies that CWS and its employees are party to, including but not limited to: the ACT Alliance Code of Conduct for the Prevention of Sexual Exploitation and Abuse, Fraud and Corruption and Abuse of Power; the ACT Alliance Code of Good Practice; the Inter-Agency Standing Committee Guidelines for the Prevention of Sexual Exploitation and Abuse; and the Principles of the Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief. CWS will follow applicable country, state, federal and local laws governing child safeguarding. This Policy has been approved by the CWS Board of Directors on October 26th, 2016.

2. PRINCIPLES

The following principles are being upheld by this policy and have been drawn from key international and regional instruments such as the International Standards for Keeping Children Safe and the United Nations Convention on the Rights of the Child:

- All children have equal rights to life, dignity and protection from harm.
- Everybody has a responsibility to support the protection of children.
- Organizations have a duty of care to children with whom they work, are in contact with or who are affected by their work and operations.
- If organizations work with partners, they have a responsibility to help partners meet the minimum requirements for the protection of children.
- All actions on child protection are taken in the best interests of the child, which are paramount.
- All actions on child protection allow participation of the child in decisions that affect them with due weight given to the views of the child in accordance to their age and maturity.

3. DEFINITIONS AND TEAMS²

Child, young person or minor. A child, young person or minor is regarded to be any person under the age of 18 years, unless a nation's laws recognize adulthood earlier. However, for the purposes of this policy, CWS will always consider a child to be anyone under the age of 18.

² See Annex B for a comprehensive list of definitions and terms

Child protection. In its widest sense, child protection is a term used to describe the actions that individuals, families, communities, organizations, or countries take to protect children from acts of all forms of physical or mental violence, injury or abuse, neglect or negligent treatment and maltreatment or exploitation, including sexual abuse. This includes domestic violence, exploitative child labor, commercial and sexual exploitation and abuse, deliberate exposure to HIV infection, physical violence, etc. It can also be used as a broad term to describe the work that organizations undertake in particular communities, environments or programs that protect children from the risk of harm due to the situation in which they are living.

Child safeguarding. Child safeguarding is the set of internal-facing, business-critical policies, procedures and practices that we employ to ensure that our organization itself is a child-safe organization. This means we ensure that:

- All CWS employees behave appropriately towards children and do not abuse the position of trust that comes with working for CWS.
- Anyone associated with CWS is aware of and responds appropriately to issues of child abuse and the sexual exploitation of children.
- CWS must create a child-safe environment in all programs and activities by always assessing and reducing potential risks to children.
- CWS, its employees, and those associated with it are driven by the duty of care to children.

Employees. For the sake of this policy, employees refer to full time, part time, temporary or casual persons on CWS' payroll, as well as those engaged in short term contracts, including but not limited to: consultants, researchers, interns, interpreters, photographers and so forth.

Others associated with CWS. For the sake of this policy, others associated with CWS are individuals who have a moderate or above degree or frequency of direct contact with children as a result of the work of CWS (see Risk Assessment section below). Examples of others associated with CWS include board members, volunteers who serve in an official representation role, CWS volunteers who have direct and ongoing contact with CWS clients or beneficiaries, and participants in CWS-organized trips to CWS program locations.

4. SCOPE

This policy applies to all CWS employees and others associated with CWS (see definitions above) in any location globally. While this policy does not extend to partner organizations, CWS will progressively seek to ensure partner organizations that receive funding from CWS adhere to global minimum standards for child safeguarding.

5. IMPLEMENTATION

CWS will ensure the safeguarding of children through an unequivocal commitment to the following:

A. RISK ASSESSMENT AND MITIGATION

CWS is committed to proactively assessing risks children face as a result of its work and taking concrete steps to reduce potential harm. CWS' thorough and systematized risk assessments will include assessing child safeguarding risks while projects are being designed and periodically during the life cycle of project implementation, with a particular emphasis on programs that bring employees and others associated with CWS into direct contact with children. CWS risk assessments will include the degree and type of contact with children, the characteristics of children's vulnerability and the degree to which project-specific safeguards are in place. CWS is committed to developing and implementing defined risk mitigation strategies at the program level when recommended by these risk assessments.

B. SAFE RECRUITMENT

CWS is committed to safe recruitment practices. CWS will take the following steps during the recruitment process:

- Ask for documentation to confirm identity and proof of relevant qualifications as a condition of employment;
- Take up to three references, including from previous employers when possible;
- Whenever the local situation and legislation allows, a job offer will be contingent upon a background check, which will include a criminal history check for countries or locations where the applicant has lived as well as the location of the office in which they will be working;
- Successful applicants will be provided with a full copy of this Child Safeguarding Policy and will be required to sign the CWS Child Safeguarding Code of Conduct (see Annex 2), which will be kept in their Human Resources file.

C. BEHAVIOR PROTOCOLS FOR EMPLOYEES AND OTHERS ASSOCIATED WITH CWS

The CWS Child Safeguarding Code of Conduct (see Annex 2) outlines the behavior which is expected of all employees and others associated with CWS, for the purpose of minimizing the likelihood of employees and others associated with CWS abusing, exploiting or grooming children. It is mandatory that all CWS employees and others associated with CWS sign and abide by the Code of Conduct. Failure to abide by the Code of Conduct will result in disciplinary measures, including but not limited to transfer to other duties, temporary suspension while an investigation is conducted, termination and/or a report being made to relevant authorities if the

breach constitutes a criminal offense.

D. TRAINING AND EDUCATION

CWS is committed to providing training on its Child Safeguarding Policy, including the Child Safeguarding Code of Conduct, for employees and others associated with CWS. The Policy will be included in the orientation of all new employees, and all employees will be required to review and sign the Code of Conduct on an annual basis. CWS may provide additional refresher trainings to its employees at the recommendation of the CWS Child Safeguarding Team (see below).

E. REPORTING, INVESTIGATIONS, AND RESPONDING TO CONCERNS

Under the duty of care principle, CWS employees are obligated to report any abuse, exploitation or grooming of a child immediately through designated complaints mechanisms. CWS employees should be able to clearly differentiate between internal and external concerns. Internal concerns are those where persons covered by this policy are the alleged perpetrators. External concerns are abuses perpetrated by persons not described in the scope of this policy.

F. REPORTING INTERNAL CONCERNS

All clients, beneficiaries, and community members may report internal concerns of abuse, violence or exploitation of a child or children. CWS employees and others associated with CWS must report internal concerns that they are aware of, see or have reasonable case to suspect. In deciding whether or not to report an internal concern of suspected child abuse, violence or exploitation, it is not required that employees have proof that the incident or situation has occurred. Any uncertainty in deciding to report a suspected internal concern should be resolved in favor of making a report.

The role of the reporting party is not to investigate the matter, but rather, to report what is known, including (1) the name and address of the child and his or her parents or other persons having custody, (2) information on the nature of the specific abuse, violence or exploitation of the child, (3) information on the identity of the person(s) believed to be the perpetrator, and (4) any supplementary information that could be helpful in establishing the cause of such abuse, violence or exploitation or in aiding the investigation of such abuses.

Report any conduct that you believe to be a violation of this policy to:

Email: ComplianceHotline@cwsglobal.org

USA and Canada (English): 855-670-0080

USA and Canada (Spanish): 800-216-1288 Canada (French): 855-725-0002

Mexico (Spanish): 01-800-681-5340

All other countries: 800-603-2869 (must dial country access code first.

[Click here](#) for access codes and dialing instructions)

Via Web: www.lighthouse-services.com/cwsglobal

Toll-free numbers and additional country-specific links are available on Annex A.

Any CWS staff person purposely making false accusations about any action by another CWS staff which is in breach of the Code of Conduct and other CWS policies will be subject to disciplinary action, up to and including termination of employment.

G. NO RETALIATION

Under no circumstances shall any CWS employee or person associated with CWS exercise any control, restraint, modification, delay or other such change in the reporting of such internal concerns. CWS shall not retaliate in any manner against any employee who discloses good faith reports of suspected child abuse, violence or exploitation or who acts as a witness to testify in any investigation or proceeding concerning a report of child abuse, violence or exploitation.

In addition, CWS shall discipline any employee who retaliates against any person who, in good faith, has reported suspected abuse, violence or exploitation of a child or who testifies, assists, or participates in any investigation, hearing, or proceeding related to such allegations.

H. INCIDENT INVESTIGATION FOR INTERNAL CONCERNS

After a report has been submitted for an internal concern of abuse, violence or exploitation of a child, CWS will conduct a thorough investigation of the report. The Global Director of HROD or the Director of the Office of the President, if the Global Director of HROD is the subject of the complaint, will designate an investigator and will report any violation of this policy that may be criminal in nature to relevant law enforcement agencies, in which case the investigation will be turned over to law enforcement officials.

Upon completion of the investigation, the designated investigator will submit an investigation report, which will be used in addressing the cause(s) of the incident and in taking the necessary steps to eliminate or reduce the likelihood of such an incident occurring again.

CWS will ensure that the privacy and confidentiality rights of the child will be protected during and after the investigation, as well as the privacy of the person reporting the internal concern, and to the extent possible, the alleged perpetrator. The investigation report will be shared with CWS executive leadership on a need to know basis, including as it relates to organizational risk such as possible legal action against CWS.

Any CWS employee who is determined after an investigation to have perpetrated abuse, violence or exploitation of a child will be subject to disciplinary action up to and including termination.

Others associated with CWS who are determined after an investigation to have perpetrated abuse, violence or exploitation of a child may have their relationship with CWS terminated.

I. CONSEQUENCES OF NON-COMPLIANCE

Any CWS employee who fails to report an internal concern, who fails to cooperate with the CWS investigation and/or police in accordance with this policy or who otherwise violates this policy, shall be subject to disciplinary action up to and including termination. Knowingly transmitting a false report or, in the case of mandated reporters, knowing and willful failure to report, can also result in criminal sanctions.

J. HANDLING EXTERNAL CONCERNS

External concerns are abuses perpetrated by persons not included within the scope of this policy (i.e. individuals who are neither CWS employees nor others associated with CWS). The primary approach for handling external concerns should be referral to the appropriate authority (e.g. police, local government child protection agency, etc.). If a child is in immediate need of attention, CWS employees should act in the best interest of the child, considering in advance how much support she or he is qualified and able to provide, and recognizing when it is best to refer to the appropriate authority. The Global Director of HROD will provide recommendations for referral pathways on an as-needed basis.

6. ROLES AND RESPONSIBILITIES

A. CWS EXECUTIVE LEADERSHIP

This policy has been approved by the CWS Board of Directors and was developed in alignment with the ACT Alliance Child Safeguarding Policy. The CWS President's Leadership Table has the responsibility to ensure the overall implementation of this policy.

B. GLOBAL DIRECTOR OF HROD

The Global Director of HROD is charged with the implementation of this Policy, including responsibility for ensuring that this policy is communicated and that all reported violations of this Policy and reported incidents of violence, abuse or exploitation of a child are investigated promptly according to the standards of this policy.

C. CWS SITE DIRECTOR/OFFICE DIRECTOR

CWS Site/Office Directors will be responsible for the implementation of this Policy within their offices (e.g. CWS Kenya, CWS Lancaster, CWS Elkhart etc.) and for making sure that this policy is communicated with the staff, including new hires.

D. CWS CHILD SAFEGUARDING TEAM

The Global Director of HROD will establish a team consisting of Site/Office Directors to oversee organizational adherence to the Child Safeguarding Policy and coordinate reporting and investigation procedures. The team's responsibilities will include, but will not be limited to:

- Conducting a comprehensive risk assessment to identify any factors or situations that may place children at risk of violence, abuse or exploitation and developing and implementing risk mitigation strategies;
- Coordinating employee training and education programs relating to child safeguarding, including communication about the Child Safeguarding Policy and complaints handling
- Coordinating investigations for internal concerns and liaising with authorities as needed;
- Ensuring safe recruitment and organization-wide staff signatures on the CWS Child Safeguarding Code of Conduct;
- Reviewing the Child Safeguarding Policy and recommending updates as needed.

E. USE OF IMAGES AND CHILDREN'S INFORMATION IN COMMUNICATIONS AND SOCIAL MEDIA

CWS adheres to a fact-based, truthful approach in all of its photo and film communications, which it aims to undertake in a safe manner, respecting the dignity of all photo/film subjects, particularly children. As such, photographers/videographers must seek informed consent from the parents/guardians of child photo/film subjects. They should identify themselves and ensure that the subject(s) have a general understanding of the purpose of the photography and that the person's story may be known and seen by others far outside the community, through publications and the internet. Informed consent builds trust and understanding, and it avoids doing harm, damaging reputations and invading personal privacy. All reasonable steps must be taken to ensure that the parent/guardian has consented in writing. If this is not possible, the parent/guardian of the child photographed/filmed must verbally consent and be mentally capable of consenting. This consent should be documented and filed.

CWS will make every effort to insist on informed consent in every instance of gathering communications material involving children. CWS will also ensure the protection of children within social media material. Employees should not post identifiable images or personal details of children associated with CWS' work on personal social media sites, unless they are sharing existing material made public on CWS' official social media sites or material that has been vetted by CWS and made available on CWS resource sharing space.

F. MONITORING AND REVIEW OF THIS POLICY

The CWS Global Child Safeguarding Team, under the leadership of the Global Director of HROD will report bi-annually to the CWS President's Leadership Table on the level of organizational adherence to this policy. This policy will be reviewed at least every three years and updated as needed. The CWS Child Safeguarding Team will make recommendations to the President's Leadership Table for further organizational child safeguarding measures needed in the interim.

ANNEX A



- Primary Website: www.lighthouse-services.com/cwsglobal

Language Abbreviation	Language Name	Direct URL
ara	Arabic	www.lighthousegoto.com/cwsglobal/ara
ben	Bengali	www.lighthousegoto.com/cwsglobal/ben
csm	Chinese (Simplified)	www.lighthousegoto.com/cwsglobal/csm
ctr	Chinese (Traditional)	www.lighthousegoto.com/cwsglobal/ctr
cze	Czech	www.lighthousegoto.com/cwsglobal/cze
dan	Danish	www.lighthousegoto.com/cwsglobal/dan
dut	Dutch	www.lighthousegoto.com/cwsglobal/dut
eng	English	www.lighthousegoto.com/cwsglobal/eng
fil	Filipino	www.lighthousegoto.com/cwsglobal/fil
fin	Finnish	www.lighthousegoto.com/cwsglobal/fin
fre	French	www.lighthousegoto.com/cwsglobal/fre
geo	Georgian	www.lighthousegoto.com/cwsglobal/geo
ger	German	www.lighthousegoto.com/cwsglobal/ger
gre	Greek	www.lighthousegoto.com/cwsglobal/gre
heb	Hebrew	www.lighthousegoto.com/cwsglobal/heb
hin	Hindi	www.lighthousegoto.com/cwsglobal/hin
hun	Hungarian	www.lighthousegoto.com/cwsglobal/hun
ind	Indonesian	www.lighthousegoto.com/cwsglobal/ind
ita	Italian	www.lighthousegoto.com/cwsglobal/ita
jpn	Japanese	www.lighthousegoto.com/cwsglobal/jpn
kor	Korean	www.lighthousegoto.com/cwsglobal/kor
lav	Latvian	www.lighthousegoto.com/cwsglobal/lav
may	Malay	www.lighthousegoto.com/cwsglobal/may
nor	Norwegian	www.lighthousegoto.com/cwsglobal/nor
pol	Polish	www.lighthousegoto.com/cwsglobal/pol
por	Portuguese	www.lighthousegoto.com/cwsglobal/por
rum	Romanian	www.lighthousegoto.com/cwsglobal/rum
rus	Russian	www.lighthousegoto.com/cwsglobal/rus
slo	Slovak	www.lighthousegoto.com/cwsglobal/slo
som	Somali	www.lighthousegoto.com/cwsglobal/som
spa	Spanish	www.lighthousegoto.com/cwsglobal/spa
swe	Swedish	www.lighthousegoto.com/cwsglobal/swe
tha	Thai	www.lighthousegoto.com/cwsglobal/tha
tur	Turkish	www.lighthousegoto.com/cwsglobal/tur
ukr	Ukrainian	www.lighthousegoto.com/cwsglobal/ukr
vie	Vietnamese	www.lighthousegoto.com/cwsglobal/vie

- **Toll-Free Telephone:**

- **Direct Dial**

- **English speaking USA and Canada: 855-670-0080**
 - Spanish speaking USA and Canada: **800-216-1288**
 - French speaking Canada: **855-725-0002**
 - Spanish speaking Mexico: **01-800-681-5340**

- **AT&T USADirect**

- **All other countries: 800-603-2869** (must dial country access code first [click here](#) for access codes and dialing instructions)
- **E-mail: reports@lighthouse-services.com** (must include company name with report)
- **Fax: (215) 689-3885** (must include company name with report)

ANNEX B – LIST OF CHILD SAFEGUARDING DEFINITIONS AND TERMS

Bullying. Bullying is a term used for a multifaceted form of mistreatment, mostly seen in schools and the workplace. It is characterized by the repeated exposure of one person to physical and/or emotional aggression including teasing, name calling, mockery, threats, harassment, taunting, hazing, social exclusion or rumors.³

Child Abuse. Abuse happens to male and female children of all ages, ethnicities, social backgrounds, abilities, sexual orientations, religious beliefs and political persuasions. Child abuse includes physical, sexual and emotional abuse, as well as neglect, bullying, discrimination, child labor and domestic violence. Abuse can be inflicted on a child by men or women, as well as by children and young people themselves.

Child labor. The term “child labor” is often defined as work that deprives children of their childhood, their potential and their dignity and that harms their physical and mental development.

Specifically, child labor refers to work that:

- is mentally, physically, socially or morally dangerous and harmful to children; and
- interferes with their schooling by:
 - depriving them of the opportunity to attend school;
 - obliging them to leave school prematurely; or
 - requiring them to attempt to combine school attendance with excessively long and heavy work.

Child, young person or minor. A child, young person or minor is regarded to be any person under the age of 18 years, unless a nation’s laws recognize adulthood earlier. However, for the purposes of this policy, CWS will always consider a child to be anyone under the age of 18.

Child pornography. In accordance with the Optional Protocol to the Convention on the Rights of the Child, ‘child pornography’ means ‘any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes.’

Child pornography material. Material that depicts a person, or is a representation of a person, who is, or appears to be, under 18 years of age and is engaged in, or appears to be engaged in, a sexual pose or sexual activity, or is in the presence of a person who is engaged in, or appears to be engaged in, a sexual pose or activity, and does this in a way that a reasonable person would regard as being, in all the circumstances, offensive.

³ World Health Organization, <http://www.who.int/bulletin/volumes/88/6/10-077123/en/>

Child protection. In its widest sense, child protection is a term used to describe the actions that individuals, organizations, countries and communities take to protect children from acts of all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, and maltreatment or exploitation, including sexual abuse. This includes domestic violence, exploitative child labor, commercial and sexual exploitation and abuse, deliberate exposure to HIV infection, physical violence, etc. It can also be used as a broad term to describe the work that organizations undertake in particular communities, environments or programs that protect children from the risk of harm due to the situation in which they are living.

Child safeguarding. Child safeguarding is the set of internal facing, business critical policies, procedures and practices that we employ to ensure that our organization itself is a child safe organization. This means we ensure that:

- Anyone who represents our organization behaves appropriately towards children and never abuses the position of trust that comes with being a member of our organization family;
- Everyone associated with the organization is aware of and responds appropriately to issues of child abuse and the sexual exploitation of children;
- We create a child-safe environment in all of our activities by always assessing and reducing potential risks to children;
- We are driven by the duty of care that we have to children.

Child-safe environment. A child-safe environment is one where active steps are taken to reduce risks of harm against children, with clear, established guidelines and procedures for conduct, reporting abuse and follow-up.

Child sexual exploitation. The abuse of a position of a child's vulnerability, differential power, or trust for sexual purposes; this includes profiting monetarily, socially or politically from the exploitation of another. Examples include child prostitution and trafficking of children for sexual abuse and exploitation.

Child sex trafficking. The movement of children from one place to another, usually with the exchange of money, for the purpose of involving those children in commercial sex work or for other sexual exploitation, such as forced marriage.

Child sex tourism. Tourism, usually by individuals or groups from developed countries to poor or developing countries, for the specific purpose of accessing children in those countries for commercial sexual exploitation purposes.

Commercial or other exploitation of a child. This refers to the use of the child in work or other activities for the benefit of others. This includes, but is not limited to, child labor. These activities are detrimental to the child's physical or mental health, education, moral or social-emotional development (WHO, 1999). Children being recruited into military service would also come under this category.

Discrimination. Discrimination includes the exclusion of, mistreatment of, or action against an individual based on social status, race, ethnicity, color, religion, gender, sexual orientation, age, marital status, national origin, political affiliation, disability or any other characteristic that represents the identity of that person.

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

Emotional abuse. Emotional abuse of a child is commonly defined as a pattern of behavior that can seriously interfere with a child’s cognitive, emotional, psychological or social development. Emotional abuse of a child — also referred to as psychological maltreatment — may include: ignoring, rejecting, isolating, exploiting, corrupting, verbally assaulting, terrorizing, or neglecting a child.

Gender-Based Violence. The term “gender-based violence” refers to violence that targets individuals or groups on the basis of their gender. The United Nations’ Office of the High Commissioner for Human Rights (OHCHR) Committee on the Elimination of Discrimination against Women (CEDAW Committee) defines Gender-Based Violence as “violence that is directed against a woman because she is a woman or that affects women disproportionately” in General Recommendation 19. Victims of gender-based violence may also include men, boys, transgender, transsexual, or gender non-conforming individuals.

Grooming. Grooming refers to behavior that makes it easier for an offender to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child, their family or their community, and then seek to sexualize that relationship (for example by encouraging romantic feelings or exposing the child to sexual concepts through pornography). Grooming often involves normalizing their behavior to everyone, not only the child, and can also involve bestowing gifts, favors or money on the child, their family, and/or the community.

Internal and external concerns. Internal concerns are those where persons covered by this policy are the alleged perpetrators. External concerns are abuses perpetrated by persons not described in the scope of this policy.

Mandated reporter. A mandated reporter is an individual who is required by U.S. law to report reasonable suspicions of child maltreatment to an appropriate agency, such as child protective services, a law enforcement agency, or a State’s toll-free child abuse reporting hotline.

Neglect. Neglect is the persistent failure or the deliberate denial to provide a child with clean water, food, shelter, emotional support or love, sanitation, supervision or care to the extent that the child’s health and development are placed at risk.

Online grooming. Online grooming is the act of sending an electronic message with indecent content to a recipient who the sender believes to be a child, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender.

Others associated with CWS. For the purposes of this policy, 'others associated with CWS' refers to volunteers, contractors, donors, representatives, media, and all individuals associated with any initiative funded or organized by the CWS.

Physical abuse. Physical abuse occurs when a person purposefully injures or threatens to injure a child or young person. This may take any form of physical treatment including but not limited to hitting, slapping, punching, shaking, kicking, burning, shoving or grabbing. The injury may take any form including but not limited to bruises, cuts, burns or fractures.

Protection. Protection includes ensuring that individual basic human rights, welfare and physical security are recognized, safeguarded and protected in accordance with international standards.

Sexual abuse. Sexual abuse is actual or threatened physical intrusion of a sexual nature, including inappropriate touching, by force or under unequal or coercive conditions. Examples of this include the use of a child for sexual gratification by an adult or significantly older child or adolescent. Sexually abusive behaviors can include fondling genitals, masturbation, oral sex, vaginal or anal penetration by a penis, finger or any other object, fondling breasts, voyeurism, exhibitionism, and exposing the child to, or involving the child in, pornography.

Sexual exploitation. Sexual exploitation is any abuse of a position of vulnerability, differential power, or trust for sexual purposes; this includes profiting materially, monetarily, socially or politically from the sexual exploitation of another individual. Sexual exploitation includes using one's position of authority, influence or control to pressure, force or manipulate someone to do something against their will knowingly or unknowingly, by threatening them with negative repercussions such as withholding project assistance, not approving an employee's work support requests, threatening to make false claims about an employee in public, etc.

ANNEX C – CWS CHILD SAFEGUARDING CODE OF CONDUCT

CWS believes that all children have the right to protection from all forms of violence, abuse and exploitation. CWS employees and others associated with CWS are responsible for maintaining a professional role with children, which means establishing and maintaining clear professional boundaries that serve to protect everyone from misunderstandings or a violation of the professional relationship. This Child Safeguarding Code of Conduct outlines the behavior that CWS expects from all CWS employees and others associated with its work, with regards to working with or in the proximity of children.

A child, young person or minor is regarded to be any person under the age of 18 years, regardless of national laws which may recognize adulthood earlier. For the purposes of this Code of Conduct, CWS will always consider a child to be anyone under the age of 18.

I will:

- ✓ Treat all children with respect, regardless of race, color, sex, sexual identity, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- ✓ Respect cultural differences which do not harm the child.
- ✓ Encourage open communication between all children, young people, parents, employees and volunteers and enhance and promote the participation of children in the decisions that affect them.
- ✓ Take responsibility for ensuring that I am accountable and transparent, and that I do not place myself in positions where there is a risk of allegations being made. Wherever possible, I will ensure that another adult is present when I am working in the proximity of children and in a visible space.
- ✓ Keep confidential all information that I am party to regarding child protection cases, disclosing and discussing information only with the relevant parties.
- ✓ Report any concerns or suspicions regarding abuse, violence, exploitation or policy non-compliance by fellow employee or persons associated with CWS, in line with my agency's reporting procedures.
- ✓ Comply with all relevant national legislation, including labor laws in relation to child labor.
- ✓ Immediately disclose all child-related charges, convictions, other exploitation /abuse and policy non-compliance in accordance with appropriate procedures.

I will not:

- ✓ Engage in behavior that is intended to shame, humiliate, belittle or degrade children.
- ✓ Use inappropriate, offensive, harassing, abusive, sexually provocative, demeaning, culturally inappropriate or discriminatory language when speaking with a child.
- ✓ Do things of a personal nature that a child can do for him/herself, such as assistance with toileting or changing clothes. If this is necessary, for example for a child with a disability, I will inform my supervisor first and put the necessary safeguards in place.
- ✓ Invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger.
- ✓ Sleep close to unsupervised children unless absolutely necessary (e.g. an emergency situation), in which case I must obtain my supervisor's permission, and ensure that another adult is present.
- ✓ Hit or physically assault children.
- ✓ Use physical punishment on children.
- ✓ Develop sexual relationships with children or relationships with children that may be deemed exploitative or abusive.
- ✓ Engage in any form of sexual activity or acts with anyone under the age of 18, including paying for sexual services or acts.
- ✓ Encourage or condone behavior on the part of others which constitutes abuse, violence or exploitation of a child.
- ✓ Behave provocatively or inappropriately with a child. Hold, kiss, cuddle or touch a child in an inappropriate, unnecessary or culturally insensitive way.
- ✓ Seek to make contact, in person, by phone, or electronically, and/or spend time with any child that I come into contact with in my role as a representative of my agency, outside of designated work and activity times of my role.
- ✓ Discriminate against any child for any reason or show special favor towards any child or group of children.
- ✓ Use any computer, mobile phone, or video and digital camera to exploit or harass children. I will not access child pornography through any medium (see also 'Use of Children's Images' below).
- ✓ Hire children to perform domestic labor or any other labor which is inappropriate given the culture, their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury or any other harm.

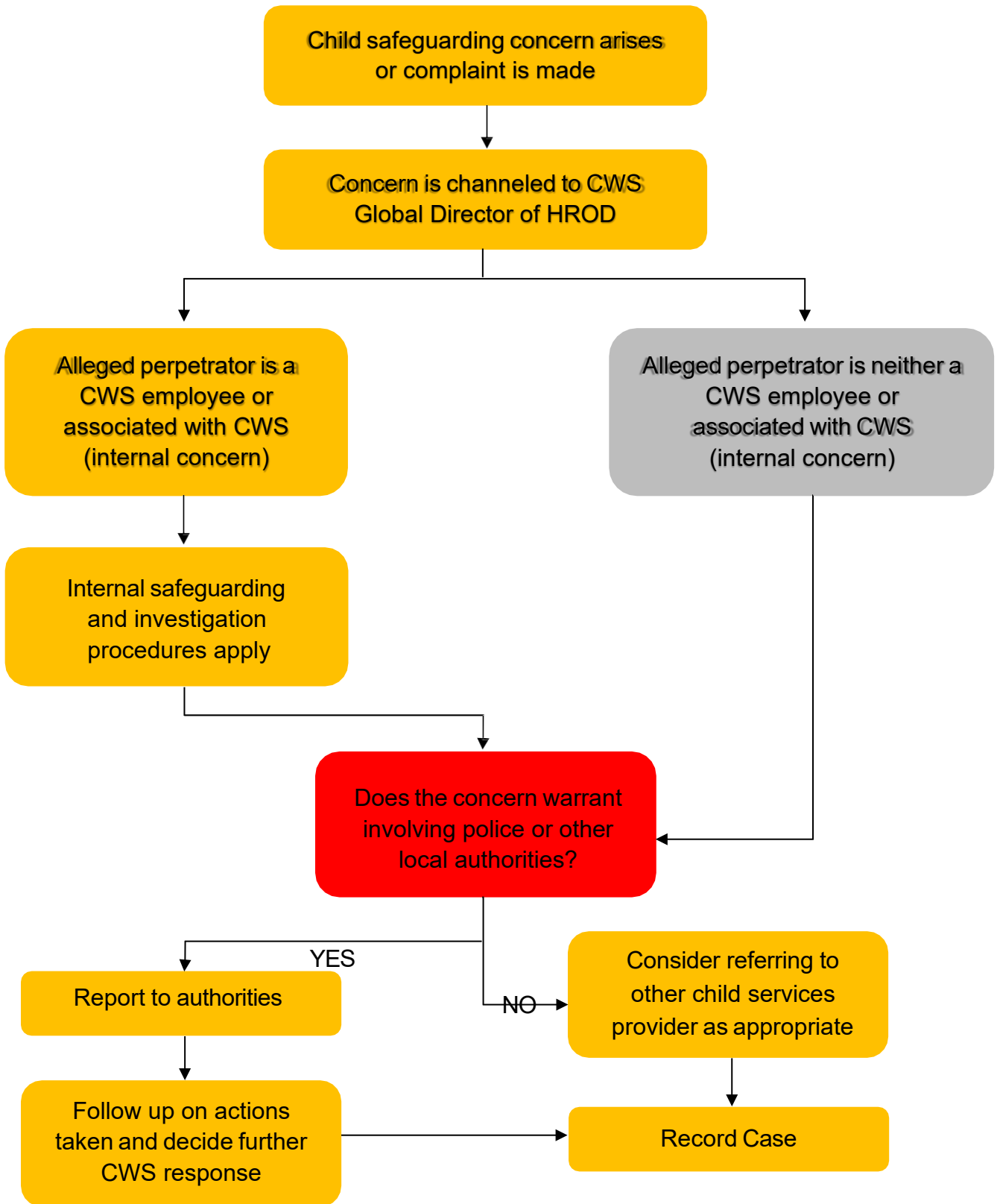
Use of Images of Children

When photographing or filming a child or children for the purposes of CWS, I must:

- ✓ Assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
- ✓ Obtain written permission or verbal informed consent⁴ from a parent/guardian of a child if I take a picture of a child in a portrait or individually. As part of this I must explain the general way in which the photograph or film will be used and the extent of the accompanying identification information.
NOTE: if informed consent cannot be reasonably obtained the photo must protect the child's identity.
- ✓ Obtain written permission (or verbal informed consent if the person consenting is unable to read or write) from a parent/guardian when extensive reporting is made of a child, or the child's face or name is visually identifiable in the photo/film footage. The way in which the photograph/film will be used must be explained and the extent of the accompanying identification information agreed upon.
- ✓ Ensure written permission or verbal informed consent has been given by parents/guardians of children (ideally to be secured in advance of trip) when taking pictures/filming groups of children. As part of this the general way in which the photograph/film will be used must be explained and the extent of the accompanying identification information. Where photos/films that include children are taken spontaneously or unexpectedly, or where informed consent cannot reasonably be obtained, children should not be identifiable in the photo/film footage).
- ✓ Ensure photographs or films present children in a dignified and respectful manner, not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- ✓ Ensure electronic file images of an individual/portrait photo of a child/children do not reveal identifying information about the child/children if permission from a parent/guardian has not been granted.
- ✓ Ensure all photographers I am supervising are screened for their suitability, including background checks where appropriate.
- ✓ Not post identifiable images or personal details of children associated with CWS's work on personal social media sites, unless sharing existing material made public on CWS's official social media sites or material that has been vetted by CWS and made available on CWS resource sharing space.

⁴ Informed consent refers to the photographer identifying themselves to the photo subjects and attempting to ensure that the subject(s) have a general understanding of the purpose of the photography and agree to themselves being photographed for this purpose.

ANNEX D – PROCEDURE FOR HANDLING CONCERNS



UNDERSTANDING THE POLICY

ANNEX E – SIGNING THE POLICY AND CHILD SAFEGUARDING CODE OF CONDUCT

I understand that I have the responsibility, as a person working for or associated with CWS, to use common sense and avoid actions or behaviors that could harm children when engaging in CWS activities or visiting CWS projects.

I have read the CWS Child Safeguarding Policy and Child Safeguarding Code of Conduct and had the opportunity to discuss its contents with my supervisor or a member of the HR team. I am aware that CWS expects me to uphold at all times the standards of behavior described in the Child Safeguarding Code of Conduct above. I also understand that disciplinary measures, up to and including termination of employment, and/or legal steps will be taken if I am found to be in breach of the Child Safeguarding Code of Conduct.

The electronic version of this policy that requires the signature of all CWS employees and others engaged by CWS is [available here](#).

If you have not already agreed to the terms of the policy by submitting the electronic form, please do so now by following the link above.

This action supercedes all prior corporate actions, including policy, resolutions or other statements with respect to the subject matter addressed herein.

English Language. *Regardless of the language in which this policy was initially prepared, the English language version of the same, approved in writing by Church World Service, Inc., is deemed the official record of this policy for the purposes of interpretation and implementation. In the event of actual or apparent conflict or ambiguity in interpretation between any expressed provision of the English language version of this policy and the expressed provisions of any non-English language version of the same, the English language version officially approved by Church World Service, Inc. shall control to the extent necessary to resolve such actual or apparent conflict or ambiguity.*

Church World Service Driver & Vehicle Policy

PURPOSE

Church World Service is committed to responsible driving behavior. The Driver & Vehicle Policy is established to protect the safety of our drivers, their passengers, and the general public and is intended for North American operations.

DRIVERS

DRIVER APPROVAL:

Anyone expected to drive as part of their job description must be approved to drive. To request driver approval, the supervisor must submit a completed "Driver Request Form" to Business Operations at the Service Center in Elkhart, Indiana.

Effective January 1, 2013, all new drivers must be approved through this process, including employees, independent contractors, interns, AmeriCorps Vista Members, program volunteers, or family members who regularly drive a CWS leased vehicle for personal use.

DRIVER REQUIREMENTS:

All driver applicants must submit the following:

- Authorization of Background Information
- a copy of the front and back of a current, valid U.S. driver's license;
- A signed Driver Acknowledgment, found on the last page of this document - Church World Service Driver & Vehicle Policy.

In addition to the Church World Service Driver & Vehicle Policy, interns must comply with college/university policy regarding permission to drive and/or permission to transport clients.

In addition to the Church World Service Driver & Vehicle policy, AmeriCorps Vista members must comply with the AmeriCorps Vista Members Driver Policy.

All driver applicants must meet the following Minimum Driver Qualifications:

MINIMUM DRIVER QUALIFICATIONS:

1. Drivers must be at least age 21.
2. Drivers must hold a valid U.S. driver's license issued by their state of residence.
3. Drivers must be capable of safely operating the type of vehicle to be driven.
4. Drivers must be able to read and speak English.

DRIVER CLASSIFICATIONS:

The Motor Vehicle Record (MVR) will be evaluated on the basis of established, uniform criteria and graded as Satisfactory, Marginal, or Unsatisfactory. One major violation (i.e. Driving

Under the Influence of Drugs or Alcohol) within the past five years may result in an “Unsatisfactory” grade.

Driver applicants receiving an “Unsatisfactory” grade will not be approved to drive. Applicants assessed as Marginal drivers present an elevated loss potential and will be assessed for employment accordingly. Final approval for driving privileges will be the responsibility of both the Business Operations Manager and the departmental supervisor.

A previously approved driver reclassified as an Unsatisfactory or Marginal driver due to one or more driving violations may be suspended from operating a vehicle as part of their job and may be subject to disciplinary action, up to and including termination.

DRIVER TRAINING:

If notified, drivers are required to complete driver training as advised.

DRIVER RESPONSIBILITIES:

As noted, the primary purpose of the CWS Driver & Vehicle Policy is to protect the safety of the driver, the vehicle occupants, and the general public. Many accidents are preventable and therefore, the responsibility of the driver.

All Church World Service drivers are required to read, understand, and follow all requirements specified within the Driver & Vehicle Policy. This includes drivers of CWS leased and owned vehicles as well as drivers of vehicles the organization does not own, such as rental vehicles and personal vehicles.

DRIVER SAFETY:

To improve driver safety, drivers are required to observe all traffic laws and the following organizational policies:

A zero tolerance policy is in effect for impaired or distracted driving. Any driver ticketed for impaired or distracted driving will be immediately suspended from operating a vehicle for business purposes.

To reduce the dangers of distracted driving, more than thirty states have banned hand-held devices or texting while driving. For this reason, Church World Service bans all cell phone use while driving, as well as other activities that contribute to careless driving.

In accordance with the Drug and Alcohol Use Policy in the CWS Employee Handbook, no employee may be under the influence of alcohol or illegal drugs while on CWS premises or while conducting business-related activities off CWS premises. This includes driving a CWS leased, rental or owned vehicle; or driving another vehicle for the purpose of conducting business. Additionally, “the legal use of prescribed drugs is permitted on the job only if it does not impair an employee’s ability to perform the essential functions of the job effectively and in a safe manner that does not endanger other individuals in the workplace.”

DRIVER REPORTING:

Drivers are required to notify their immediate supervisor immediately of any change in driving status:

1. Any illness, injury, physical condition or use of medication that may impair or affect their ability to safely drive a vehicle; or
2. Any moving violation.

Violations are not considered reimbursable costs under the Church World Service Travel Expense Reimbursement Policy. All violations, including parking, toll, and speeding tickets, will be the responsibility of the driver, not of Church World Service.

ANNUAL DRIVER RE-EVALUATION:

All drivers must submit the Employment Inquiry Release Form and MVR's will be reviewed annually.

VEHICLES

Vehicle operations create substantial risk, generating both legal and financial responsibility. Financial responsibility, and thereby insurance responsibility, is determined by vehicle ownership.

ALL VEHICLES:

Drivers are responsible for ensuring that all vehicles used on company business and/or all vehicles leased or owned by CWS are well-maintained. Vehicle maintenance is performed according to manufacturer's specifications.

Seat belts save over 13,000 lives every year. All drivers are required to use seat belts and ensure that all passengers use appropriate restraints.

Due to a consumer's advisory issued by the National Highway Traffic Safety Administration, Church World Service has decided to ban the lease or rental of 15 passenger vans.

PERSONAL VEHICLES:

While performing assigned duties in personal vehicles, drivers may not transport passengers other than those determined by supervisory authority to be directly related to and within the scope of official responsibilities.

Approved drivers are reimbursed according to The CWS Travel and Expense Reimbursement Policy for the use of their personal vehicles in the course of CWS business. Mileage reimbursement is intended to compensate drivers for gas, maintenance, and insurance.

Therefore, all approved drivers requesting mileage reimbursement for personal vehicles must submit proof of insurance annually.

Auto liability insurance must be maintained on the personal vehicle at all times with limits that meet the following requirements: \$100,000 bodily injury liability maximum for one person injured in an accident/\$300,000 bodily injury liability maximum for all injuries in one accident/\$50,000 property damage liability maximum for one accident.

RENTAL VEHICLES:

There is a growing trend on the part of rental car companies to insert the following two clauses into their rental contracts:

1. "Diminution of Value" – this represents the reduction in a vehicle's market value due to its having been involved in an accident. When a rental vehicle is returned in damaged condition, he or she receives one bill for the repairs, and another for diminution in value.
2. "Before and After" – With some types of damage, liability concerns motivate the rental company to simply sell a damaged rental for salvage. The renter is responsible for the difference between the actual damage and the salvage value.

If either of these two clauses appears in the rental contract, the rental company insurance should be purchased.

REPORTING VEHICLE ACCIDENTS

All vehicle accidents must be reported by the driver to Business Operations (1-800-297-1516) within 24 hours.

Additionally:

- Personal Vehicles – the Driver should contact his/her personal automobile insurance carrier for coverage.
- Rental Vehicles – the Driver should notify the rental company according to the rental contract.

Every leased/owned vehicle is required to have an Accident Reporting Form in the glove box. This form should be used by the driver to record accident facts as soon as possible after the accident and then fax (574-262-0966) or e-mail the completed form to Business Operations.

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See page 5 for Driver Acknowledgment

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**CHURCH WORLD SERVICE, INC.
Conflict of Interest and Disclosure Policy Acknowledgement and Disclosure
Statement Form Procedure (Employees and Representatives)**

Title:	Conflict of Interest and Disclosure Policy Acknowledgement and Disclosure Statement Form Procedure (Employees and Representatives)
Type:	Board
Reason for Policy:	Best Practice Regulatory Requirements
Coverage ¹ :	CWS Worldwide Consultants Contractors Interns Vendors
Policy, Procedure and Resource Adjacencies:	Anti-Nepotism Policy Bylaws Code of Conduct Confidentiality Policy Conflict of Interest and Disclosure Policy (Employees and Representatives) Fraud Policy and Protocols Policy Procurement and Purchasing Policy U.S. Employee Handbook Whistleblower Policy Administration of the Complaints and Grievance Mechanism Procedure
Policy Steward:	Vice President, Operations
Reviewed by Prior to Approval:	Executive Leadership Team Legal Chief of Staff and Vice President, Governance President and Chief Executive Officer Governance Committee
Approved By:	Board
Frequency of Review:	3 years
Date Approved:	January 23, 2024
Date Reviewed (with no change):	
Implementation Date(s):	January 23, 2024

¹ Policies and procedures that apply to affiliates, consultants, contractors, partners, sub-grantees vendors or volunteers may be applied directly as CWS policies or, in some cases, by the other party having their own similar policy. This will be specified in written agreements with other parties.

Conflict of Interest and Disclosure Policy Acknowledgement and Disclosure Statement Form Procedure (Employees and Representatives)

The Church World Service, Inc. (CWS) Conflict of Interest and Disclosure Policy is designed to assist CWS employees and Representatives in meeting their ongoing responsibility to disclose business or personal interests that may create a conflict of interest. Below is an acknowledgment stating that you have received a copy of the CWS Conflict of Interest and Disclosure Policy, have read it and understand it, and agree to comply with it. The attached Annual Disclosure Statement requests a list of (1) all entities in which you or a Relative holds a position as director, trustee, officer, owner, partner, member, or employee and with which CWS has or may have a relationship; and (2) any other potential or actual conflict of interest or duality of interest that may influence your ability to fulfill your responsibilities to CWS. Please complete the Acknowledgement and Disclosure Statement and return the signed statements to the Human Resources Department (employees and interns) and to the Procurement Department (for CWS Representatives: consultants, contractors, and vendors).

Acknowledgment

I hereby acknowledge that I have received a copy of the CWS Conflict of Interest and Disclosure Policy and that I have read it and understand it. I hereby agree to abide by and comply with the CWS Conflict of Interest and Disclosure Policy and agree to report promptly any future situation that might be a Conflict of Interest in accordance with the Policy.

CWS Consultants, Contractors and Vendors, please include the Project (RFQ/RFP/ITB) number and title:

CHURCH WORLD SERVICE, INC.

Annual Disclosure Statement

To protect the reputation and integrity of Church World Service, Inc. (CWS), the Conflict of Interest and Disclosure Policy requires that I must disclose all relationships that may influence the way I carry out my responsibilities as a CWS employee or Representative. This includes disclosure of any financial interest that I have or reasonably expect to have in any proposed or existing transaction or arrangement with CWS.

In the space below, please list (1) all entities in which you or a Relative holds a position as director, trustee, officer, owner, partner, member or employee and with which CWS has or may have a relationship; and (2) any other potential or actual conflict of interest.

1. All entities in which you or a Relative holds a position as director, trustee, officer, owner, partner, member, or employee and with which CWS has or may have a relationship *(list name of relative (if relevant), name of entity and position held):*

a. Corporate (either non-profit or for-profit) directorships, positions, and employment:

b. Memberships in the following organizations:

c. My primary business or occupation, position, and employer at this time is:

2. Any other potential or actual conflict of interest in accordance with the Policy
(list name of Relative (if relevant), name of entity and nature of interest):

The above information is correct and complete to the best of my knowledge.

This action supersedes all prior corporate actions, including policy, resolutions or other statements, with respect to the subject matter addressed herein.

English Language. *Regardless of the language in which this policy was initially prepared, the English language version of the same, approved in writing by Church World Service, Inc., is deemed the official record of this policy for the purposes of interpretation and implementation. In the event of actual or apparent conflict or ambiguity in interpretation between any expressed provision of the English language version of this policy and the expressed provisions of any non-English language version of the same, the English language version officially approved by Church World Service, Inc. shall control to the extent necessary to resolve such actual or apparent conflict or ambiguity.*

**CHURCH WORLD SERVICE, INC.
Artificial Intelligence Tools in the Workplace Policy**

Title:	Artificial Intelligence Tools in the Workplace Policy
Type:	Management
Reason for Policy:	Best Practice
Coverage ¹ :	CWS Employees Worldwide Affiliates Board Contractors Covered Volunteers Interns Partners Vendors
Policy, Procedure and Resource Adjacencies:	Acceptable Information Technology Use Policy Code of Conduct Policy Communications and Media Policy Complaints and Grievance Policy Confidentiality Policy Data and Information Technology Security Policy Privacy Policy Administration of the Complaints and Grievance Mechanism Procedure Minutes and Recording of Board and Committee Meetings Procedure Style Guide Procedure Storytelling Guide
Policy Steward:	Senior Director, Operations
Reviewed by Prior to Approval:	Senior Director, Information Technology General Counsel Chief Operating Officer
Approved By:	President and Chief Executive Officer
Frequency of Review:	1 year
Date Approved:	October 29, 2025
Date Reviewed (with no change):	
Implementation Date(s):	November 17, 2025

¹ Policies that apply to affiliates, contractors, partners, or vendors may be applied directly as CWS policies or, in some cases, by the other party having their own similar policy. This will be specified in written agreements with other parties.

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1. **PURPOSE**

The purpose of this Policy is to establish expectations and requirements for the appropriate use of artificial intelligence (AI) in Church World Service (CWS), including the use of Generative AI (GAI) and Algorithmic AI (AAI) tools, defined below. This Policy aims to ensure that AI technology is deployed responsibly and is used in a lawful and ethical manner to enhance productivity, efficiency, and decision-making while complying with applicable law and respecting privacy, confidentiality, and data security.

2. **SCOPE**

This Policy applies to all employees, contractors, those listed above under “Coverage”, and third-party vendors who interact with, develop, or implement AI Tools within our organization (collectively, “AI users”). It covers all AI technologies, including Large Language Models, Generative Adversarial Networks, Diffusion Models, machine learning, deep learning, neural networks, natural language processing, predictive analytics, autonomous systems, and computer vision. This Policy applies to tools developed and made available by third parties to the public on behalf of CWS. If you are unsure whether a software tool, app or website employs AI technology and falls within the scope of this policy, please contact the Senior Director, Information Technology.

3. **AI OVERSIGHT GROUP**

An internal AI Oversight Group will oversee CWS's AI usage, ensuring that AI is deployed ethically and in compliance with legal requirements. This group will also manage the approval and auditing of new AI tools.

4. **DEFINITIONS**

- **Generative AI (GAI)** refers to artificial intelligence systems capable of creating new content, such as text, images, audio, or video, that closely resembles human-generated output. These systems use machine learning algorithms, typically based on large neural networks, to analyze vast amounts of existing data and generate novel, contextually appropriate content. Generative AI models can produce a wide range of creative and practical outputs, from writing articles and composing music to designing products and generating computer code. (e.g., ChatGPT, Claude, Gemini, Llama).
- **Algorithmic AI (AAI)** refers to artificial intelligence systems that use predefined sets of rules and instructions (algorithms) to analyze data, make decisions, and perform tasks. Algorithmic AI follows fixed programmed procedures to accomplish specific goals. These algorithms can range from simple to highly complex. A subset of AAI uses machine learning where the system improves performance by identifying patterns and making predictions from data without being explicitly programmed for every scenario.

- AI Tool is any app, software, or system that utilizes artificial intelligence (including Generative and Algorithmic AI), machine learning, or other advanced algorithms to perform tasks, analyze data, or make (or assist in making) decisions. AI tools may use GAI, AAI, or both. Tools that use AI are not always easy to recognize. If you are unsure whether a software tool, app or website employs AI technology and falls within the scope of this Policy, please contact the CWS Senior Director, Information Technology.

5. **GENERAL PRINCIPLES**

For purposes of this Policy:

- **Legal Compliance and Ethical Use**

We are dedicated to upholding lawful and ethical standards in the usage, development, and deployment of AI technologies. We aim to ensure that our AI systems are designed to respect fundamental human rights, dignity, and diversity. We actively seek to mitigate biases and discrimination in any tool or system that employs AI to promote fairness and inclusivity. AI users must comply with all relevant laws and regulations, including intellectual property, data protection, and anti-discrimination laws. Furthermore, AI usage must also comply with industry-specific regulations and others where AI applications may be subject to additional scrutiny or legal requirements.

- **Transparency**

We believe in transparency as a cornerstone of responsible AI. We strive to provide clear and understandable explanations of our AI system utilization and how those systems work, including their objectives, capabilities, and limitations.

- **Location of Use of AI**

This Policy applies when AI users use AI tools to perform, or assist in the performance of, any work-related activities without regard to the location (i.e., in the office, at home, or at any other location) of the AI users at the time they use the AI tools, or whether the AI users operate the AI tools on CWS equipment and systems, on the AI users' personal devices, or on third-party electronic devices.

- **Other CWS Policies**

In addition to this Policy, AI users must comply with all other CWS policies concerning conduct, confidentiality, ethics, computer use, electronic communication, equal employment opportunity and anti-discrimination and harassment.

- **Potential for Error**

AI tools (particularly GAI tools) themselves acknowledge they may produce erroneous or nonsensical information or results that are not real, do not match any data the algorithm has been trained on, or do not follow any other discernible pattern. In addition, the results may reflect biased or incomplete data sets on which they were trained. AI tools should not be used blindly for decision-making and/or the creation of content and should not be relied upon for important inquiries.

- **Limitations and Over Reliance**

When AI users use AI tools to assist in their performance of job-related responsibilities, CWS expects AI users to recognize the limitations of the tools they are using, avoid over-reliance on such tools, carefully check for mistakes, and remain vigilant to identify potentially erroneous, incomplete, or otherwise problematic output. Responses provided by AI tools should be reviewed to ensure they are consistent with the prompt or instructions initially provided and should also be checked for accuracy and reliability by comparing outputs against trusted, non-AI sources.

- **Accountability**

We establish mechanisms for accountability with respect to any tool or application that uses AI and are launched for employee use. We recognize that AI is not infallible, and human oversight is crucial to correct and anticipate mistakes, maximizing the tool's value while ensuring ethical use. AI users who have concerns with the output of an AI tool should follow the Reporting Procedures set forth below.

- **Training and Education**

CWS may require that AI users receive regular training, either in-house or through a third-party vendor, concerning responsible AI usage, data protection, and the potential benefits and risks associated with using AI tools and on the operation and use of approved AI tools. Training is designed to ensure employees understand the ethical and legal ramifications of AI use.

If CWS does require such training, AI users must comply with any associated requirements (e.g., attendance and satisfaction of certain skills assessments) before they can access and use AI tools for work-related purposes.

Additionally, AI tools are constantly evolving and improving in various aspects. AI users should familiarize themselves with the limitations and benefits associated with using AI tools and continuously evaluate the effectiveness and efficiency of their output for work-related purposes.

6. USE OF APPROVED AI TOOLS

Prior to using a non-approved tool, the department or AI user seeking to use the tool must request and be approved for use by the CWS Information Technology (IT) Department and in the request, state the intended use of the tool. AI users must not use any non-approved tool until it has been approved by IT.

CWS will maintain a list of AI tools that have been approved for use, with a specific indication as to which departments and job classifications may use each tool. The list of these tools can be found on the Artificial Intelligence SharePoint Site on the CWS employee intranet.

Questions concerning whether an application which is not included on the list is an approved AI tool, and subject to this policy, should be referred to IT.

For AI tools which require registering an account prior to its use, AI users should sign up using their CWS email address to allow CWS access to queries, prompts, outputs, and responses from the AI tool. Additionally, AI users should not delete or hide their interactions with AI tools should a potential review of the AI tools' work product be necessary.

7. APPROPRIATE USE OF AI

AI users should only use permitted AI tools in authorized circumstances when they enhance or assist the AI users in performing their job-related tasks by enhancing productivity, efficiency, and responsible decision-making. Examples where AI tools can be useful include sorting, ranking, and evaluating large quantities of data, documents, and information. Examples of possible uses of AI tools employing GAI include preparing or generating:

- First drafts of marketing materials, social media content, educational materials, job descriptions and other standard correspondence and documents;
- Summaries and analysis of data, documents, program descriptions, technical briefs and sets of documents;
- Brainstorming to source ideas that could lead to first drafts of such documents;
- Images and video from text.

Media

When using AI tools to externally represent CWS's mission, programs or participants, users must always comply with CWS's "Communications and Media Policy", "Style Guide Procedure" , and "Storytelling Guide" . It is preferred that original CWS media be utilized whenever possible as opposed to AI generated content. When utilizing AI tools to appropriately generate, augment, or enhance

visual or audio content, it is imperative to represent our clients, donors, employees, and communities we serve accurately and with respect. Any augmentation of CWS media must adhere to the original intent and context of the content. AI tools can never be used to modify or generate original audio or visual content relating to the likeness of an identifiable individual without their consent.

Note Taking

Note taking or similar meeting administrative support provided by an AI tool is only allowed under the following circumstances:

- The tool has been approved and is on the AI Approved Tool list.
- All meeting participants consent to its usage.
- The generated notes should not be circulated externally without the review of a CWS staff member present during the meeting.

This kind of tool should not be utilized for large format meetings (such as staff town halls) or meetings with sensitive subject matter. Any meeting host who encounters the unauthorized use of an unauthorized AI note taker is directed to remove the proxy from the meeting. Note the prohibition of using any form of AI in conjunction with a CWS Board and Board Committee meetings (see “Minutes and Recording of Board and Committee Meetings Procedure”).

8. PROHIBITED USES

As a general matter, fully autonomous AI decision-making is prohibited in high-risk areas without human oversight and may be subject to specific legal requirements. No AI user may use AI tools for personnel decision-making purposes (e.g., hiring, promotion, performance rating, discipline, or termination) without the express written consent of the Senior Director, Human Resources or their designee.

Additionally, all AI users must comply with any request by a partner, including vendors, to not use an AI tool or to otherwise limit how AI tools are used.

9. CONFIDENTIALITY, PRIVACY, AND DATA PROTECTION

We adhere to stringent data governance practices and comply with relevant regulations to safeguard all confidential and protected data, including but not limited to any personal identifying information (“PII”), program participant and/or client data, and any intellectual property (IP), such as CWS wordmark and logo, or program materials, belonging exclusively to CWS. AI Users must prevent unauthorized access, disclosure, or destruction of data and respect privacy laws and adhere to applicable data protection laws. They must also ensure that personal or sensitive information used in AI technologies is handled with the utmost care and in some instances should never be shared with these AI tools. Some AI technologies can

collect, store, and use inputted information and disclose this information to other third parties without CWS's knowledge or control. This creates a risk of the disclosure of trade secrets, confidential information and data, potential violation of U.S. or international law, and violating contracts with partners.

Users of AI should remain alert and vigilant of potential cybersecurity threats and attacks as AI generated content is everywhere, creating a need to increase verification. When using AI tools, AI users must comply with CWS's "Confidentiality Policy" and "Acceptable Information Technology Use Policy".

AI users typing or sharing information into an AI tool are prohibited from disclosing confidential or proprietary business information belonging to CWS or its partners, or from infringing upon the intellectual property of CWS or others.

To the extent information is licensed from a third-party, the output may be subject to restrictions on the use of the information contained therein. Inputting such licensed information into an AI tool could constitute a breach by the user of those third-party restrictions.

The publication or distribution of the output of an AI tool could result in the violation of the intellectual property rights of third parties. distributing content primarily generated by AI tools, AI users must make known – through a disclaimer or otherwise – that the content has been generated by AI. This does not include editing or modifications that do not significantly change the original intent or context of the content.

AI users must always comply with CWS's "Data and Information Technology Security Policy".

10. REPORTING PROCEDURES

If a CWS employee or any person covered by this Policy suspects the following (see bulleted list below), then that person should use the mechanism described in the "Administration of the Complaints and Grievances Mechanism Procedure" to report the suspected violation, including but not limited to:

- An actual or possible violation of this Policy;
- A circumstance where an AI tool is generating output which in the AI user's assessment is: i) erroneous, ii) incomplete, iii) misleading, iv) offensive, v) harassing, vi) discriminatory, vii) which causes an employee to have other concern(s), or viii) which violates any CWS policy.

Any technical issues, system failures, or a breach of data privacy or security should be reported to it@cwsqglobal.org

CWS may, in its sole discretion, decide to suspend use of an AI tool during any investigation that stems from the “Complaints and Grievance Policy” or related procedure.

To the extent corrective measures are required following the investigation, AI users must cooperate in the implementation of those measures.

11. VIOLATIONS

Violations of this Policy may result in disciplinary action, up to and including termination of employment or contract (as in the case of a contractor or third-party vendor). Nothing herein shall modify the at-will nature of an employee's employment with CWS. If AI users have questions about this policy, they should contact the Senior Director, Operations.

12. AMENDMENT OF THESE POLICIES

AI technology and the laws and regulations governing AI are rapidly evolving and this policy may be amended from time to time to reflect the evolving landscape.

This action supersedes all prior corporate actions, including policy, resolutions or other statements, with respect to the subject matter addressed herein.

English Language. *Regardless of the language in which this policy was initially prepared, the English language version of the same, approved in writing by Church World Service, Inc., is deemed the official record of this policy for the purposes of interpretation and implementation. In the event of actual or apparent conflict or ambiguity in interpretation between any expressed provision of the English language version of this policy and the expressed provisions of any non-English language version of the same, the English language version officially approved by Church World Service, Inc. shall control to the extent necessary to resolve such actual or apparent conflict or ambiguity.*