U.S. NONPROFIT SAFEGUARDING

Crosswalk Project

Organizational Safeguarding Policy Template

Prevention of Sexual Exploitation, Abuse, and Harassment (PSEAH)

Series	Crosswalk Project Implementation Toolkit — Tool 1
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Updated	October 2026
License	Creative Commons Attribution 4.0 International (CC BY 4.0) — free to use, adapt, and share with attribution
Companion tools	Tool 2 — Safeguarding Self-Assessment; Tool 3 — Adopter Feedback Form; Tool 4 — Safeguarding Training Outlines
Companion research	Gul, S. (2026). *Safeguarding Without a Baseline: A Crosswalk from the IASC Six Core Principles to United States Domestic Legal and Regulatory Anchors* (Module 1 of the U.S. Nonprofit Safeguarding Crosswalk Project). Zenodo. DOI: https://doi.org/10.5281/zenodo.22022939
Latest version	https://pseacrosswalk.org/toolkit.html
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Scope note. *This template is an operational policy resource, not legal advice. It is designed to complement — never replace — the laws of your state, including mandatory-reporter and background-check requirements. Organizations should have the completed policy reviewed by counsel licensed in their state before adoption. The author is not admitted to practice law in the United States.*

For organizations outside the United States. *The policy's structure and the Code of Conduct (Section 3) apply anywhere. The sections that refer to U.S. law — background checks (Section 4), reporting to authorities (Sections 3.5, 5.1, 5.3 and 7.2, and Annex B), and records retention (Section 9.2) — must be adapted to the laws of your own country and reviewed by counsel qualified there. The U.S. rules cited in the guidance boxes and the Appendix are models, not requirements outside the United States.*

How to Use This Template

This template converts the findings of the Crosswalk Project's open-access research into a ready-to-adopt organizational policy. The research (Module 1) mapped the thirteen obligations of the international humanitarian sector's safeguarding standard — the IASC Six Core Principles Relating to Sexual Exploitation and Abuse — against United States law, and found that no obligation is covered by a requirement of general application that both reaches nonprofits as a class and protects the people they serve. This policy is built to close that gap at the organizational level, using design requirements derived directly from the research: it is

beneficiary-facing, preventive, portable across service areas, specified at the operational level, and anchored in board-level accountability.

Three steps:

- **Complete every bracketed field**, highlighted in yellow like this: **[Organization Name]**. Adapt the options to your organization's size, staffing, and beneficiary population, and remove the highlighting when the policy is final.
- **Delete the guidance boxes** (shaded paragraphs marked "Guidance") once the section is complete — they are instructions to you, not policy text.
- **Adopt the policy by board resolution** using the adoption block in Section 10, and calendar the annual review date.

Scope of this template. Safeguarding is an organization's duty to ensure that its personnel, operations, and programs do no harm to the people it serves — covering physical harm, emotional harm, and neglect as well as sexual exploitation, abuse, and harassment. This template establishes that general safeguarding architecture — screening, conduct standards, training, reporting, response, records, and board accountability — with its conduct provisions (Section 3) specified for the PSEAH pillar, where international practice is most fully developed. Organizations adopting it build protective infrastructure that reduces the risk of harm of every kind.

Sections 1–3 and 6 are the starter policy for a small or all-volunteer organization: purpose, definitions, the Code of Conduct, and a way to report. They are a foundation, not a complete safeguarding system. Sections 4–9 complete the whole-of-organization system and should be adopted, as soon as the organization can, by any organization with staff or regular volunteers in contact with beneficiaries.

The First 90 Days

A realistic sequence for a small organization. Every step below uses only these published tools, and nothing on this page requires spending money except the criminal-history checks your state or funders require. The policy takes effect once the Focal Point is named and the reporting channels are posted — the two things Section 6 requires from day one.

When	What	Tool
Week 1	Board passes the adoption resolution (Section 10) and designates the Safeguarding Focal Point and alternate (Section 6.1); the resolution sets the effective date as the day the reporting channels are posted.	Tool 1
Weeks 2–3	Choose and post the reporting channels (Section 6.2; Annex A) — the policy is now in effect. Complete NSOPW.gov and reference checks for contact roles (Section 4); collect signed acknowledgments of the Code of Conduct (Section 4.3).	Tool 1
Month 2	Deliver Session 1 orientation internally; begin handing the Participant Charter (Annex B) to participants at intake.	Tools 4 and 1
Month 3	Run the 32-indicator Self-Assessment as your baseline; record the score; calendar the annual cycle — policy review, refresher training, re-assessment.	Tool 2
Any time after	Send the Notice of Adoption (Annex C) — two minutes; and, if willing, the Adopter Feedback Form.	Tools 1 and 3

SAFEGUARDING POLICY OF [ORGANIZATION NAME]

Adopted by the Board of Directors on **[date]** · Next scheduled review: **[date + 12 months]**

1. Purpose and Scope

[Organization Name] ("the Organization") exists to serve **[describe beneficiary population — e.g., refugee families, youth, survivors of domestic violence, food-insecure households]**. Many of the people we serve depend on us for access to assistance, and that dependence creates a power differential between our personnel and our program participants. The purpose of this policy is to ensure that this power is never misused: that every person who receives our services is protected from sexual exploitation, abuse, and harassment by the people entrusted to deliver them.

This policy applies to every person acting on the Organization's behalf: board members, employees, volunteers (regular and episodic), interns, contractors, and consultants (together, "personnel"). It applies during program activities and outside them, wherever conduct involves a program participant. It protects program participants and beneficiaries. Workplace conduct between personnel — including harassment of one staff member by another — remains governed by the Organization's personnel policies and applicable employment law, which this policy does not replace.

> ***Guidance (delete after completing):*** *Keep this section short. The two sentences that matter to an external reader — including a funder or evaluator — are the recognition of the power differential and the statement that the policy is beneficiary-facing, covering conduct toward the people you serve rather than workplace conduct between employees.*

2. Definitions

Safeguarding means the responsibility of the Organization to ensure that its personnel, operations, and programs do no harm to the people it serves and do not expose them to the risk of exploitation, abuse, or harassment.

Sexual exploitation means any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including profiting monetarily, socially, or politically from the sexual exploitation of another.

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

Sexual harassment means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature directed at a program participant.

Program participant / beneficiary means any person who receives, seeks, or is eligible to receive services or assistance from the Organization, and includes family members present in service settings.

Safeguarding Focal Point means the named person designated under Section 6 to receive and act on safeguarding reports.

Child means any person under the age of 18, regardless of the age of majority or age of consent in the applicable state.

> ***Guidance (delete after completing):*** *These definitions are anchored, not invented, and the operative text is intentionally left uncited so the policy reads as your organization's own document. Their sources are recorded in the Appendix ("Definitional basis"): sexual exploitation and sexual abuse follow the UN Secretary-General's*

> *Bulletin ST/SGB/2003/13, § 1; child applies the international under-18 rule regardless of state age-of-majority or age-of-consent laws; sexual harassment uses the operative wording of U.S. equal-employment practice (29 C.F.R. § 1604.11(a)), deliberately redirected to program participants, whom employment law's harassment protections do not reach.*

3. Code of Conduct: Prohibited Conduct

The following standards adapt the six core principles of the international safeguarding framework to the Organization's domestic operations. They are conditions of employment, board service, and volunteering. Each numbered standard is an organizational rule: it applies regardless of whether the conduct would also violate criminal or civil law, and it applies in every state in which the Organization operates.

3.1 Sexual exploitation and abuse constitute gross misconduct. Any act of sexual exploitation or sexual abuse of a program participant by any of the Organization's personnel is grounds for immediate termination of employment, contract, board service, or volunteer engagement.

3.2 Sexual activity with children is prohibited. Sexual activity with any person under 18 is prohibited regardless of the local age of consent. A mistaken belief about a person's age is not a defense in the Organization's disciplinary proceedings.

3.3 Exchange of anything for sex is prohibited. The exchange of money, employment, goods, or services for sex or sexual favors is prohibited. This expressly includes conditioning, delaying, or withholding assistance that a program participant is already entitled to receive. A participant's entitlement may never be the medium of exchange.

3.4 Sexual relationships with program participants are prohibited. Sexual relationships between personnel and adult program participants are prohibited while the service relationship exists, because the imbalance of power inherent in that relationship undermines the possibility of meaningful consent. This rule applies to all personnel, whether licensed professionals or not, including case managers, intake workers, drivers, mentors, and volunteers.

3.5 Personnel must report concerns. Any of the Organization's personnel who develops a concern or suspicion of sexual exploitation, abuse, or harassment by a colleague, whether within this Organization or at a partner or referral organization, must report it through the mechanism established in Section 6. Reporting in good faith will never result in retaliation. This internal duty is in addition to, and never replaces, any mandatory reporting duty under **[state]** law.

3.6 Everyone maintains the preventive environment. All personnel are obliged to help create and maintain an environment that prevents sexual exploitation, abuse, and harassment. Managers and board members carry responsibility for building and resourcing the systems, including screening, training, reporting, response, and monitoring, set out in Sections 4 through 9.

3.7 Boundaries apply in digital and remote service delivery. The standards in 3.1 through 3.6 apply with equal force when services, mentoring, or communication occur by phone, text, video, email, or social media. In addition: personnel communicate with program participants only through the Organization's designated channels and accounts, never through personal social media accounts or undisclosed personal numbers; one-to-one private digital communication with a child participant is prohibited — digital contact with a child occurs in a group setting, in a supervised channel, or with a second adult included, mirroring the in-person two-adult practice; virtual sessions with participants are scheduled through the Organization, conducted at reasonable hours, and recorded in program records like any other service contact; and personnel do not

photograph, record, or share images of program participants except as authorized under the Organization's consent procedures.

> ***Guidance (delete after completing):*** *This standard is a Project extension. The international six principles, adopted in 2002, predate service delivery by text and video and are silent here — and U.S. rules on electronic communication with served populations exist only in bounded settings, such as the U.S. Center for SafeSport's MAAPP for amateur sports. Adapt the channel list to what your organization actually uses; the rule that matters most in practice is the first one — no personal-account contact. If you serve adults only, keep the child rule anyway: family members present in service settings include children (Section 2).*

> ***Guidance (delete after completing):*** *Standards 3.2 and 3.3 deliberately set the organizational rule higher than the legal minimum in most states: state ages of consent vary between 16 and 18, and no general law prohibits conditioning assistance on sexual favors where no coercion can be proven. Adopting the stricter rule internally is the point — it is what the international framework requires and what state law does not.*

4. Screening and Recruitment

4.1 Every position, whether paid or volunteer, is classified at recruitment as either a contact role (unsupervised or recurring contact with program participants, or access to their personal data) or a non-contact role. The classification is recorded in the position description.

4.2 Before any person begins a contact role, the Organization completes: (a) a check of the National Sex Offender Public Website (NSOPW.gov), which is free of charge; (b) a criminal history check meeting the requirements of **[state]** law and any funder conditions; (c) at least two reference checks, each asked directly whether they have any safeguarding concern about the candidate; and (d) a review of unexplained gaps in work or volunteer history.

4.3 Every offer of employment, board appointment, or volunteer engagement is conditional on written acknowledgment of this policy. Interviews for contact roles include at least one values-based question about boundaries with program participants.

4.4 Screening is repeated every **[two/three]** years for personnel in contact roles.

> ***Guidance (delete after completing):*** *A free NSOPW check plus structured reference questions is achievable for an all-volunteer organization with no budget. If your organization holds AmeriCorps or similar federal funding, the National Service Criminal History Check (45 C.F.R. § 2540.204) sets the mandatory floor for covered positions — do not go below it.*

5. Training

5.1 All personnel — including board members, contractors, and volunteers, consistent with their roles — complete safeguarding orientation before beginning work, covering: what constitutes sexual exploitation, abuse, and harassment; the conduct standards in Section 3; how to recognize warning signs; and how to report, internally and to state authorities.

5.2 Personnel in contact roles complete a refresher at least annually. The Safeguarding Focal Point and all managers complete additional training on receiving reports and coordinating response.

5.3 Personnel who are mandatory reporters under **[state]** law are told so in writing at onboarding, together with how, where, and within what timeframe to report.

5.4 Training completion is documented: date, content covered, and attendance, retained per Section 9.

> ***Guidance (delete after completing):*** *The training model here follows the most fully specified federal safeguarding training rule (42 C.F.R. § 483.95, long-term care), which pointedly extends training to volunteers. Free, open-access training outlines (Tool 4 in this series) are available.*

6. Reporting Mechanism

6.1 Focal point. The board designates a Safeguarding Focal Point — currently **[name, role]** — and an alternate, **[name, role]**, for reports concerning the Focal Point or executive leadership. The Focal Point need not be an executive or a safeguarding specialist: the authority to act on any report — including a report concerning a manager or executive — is conferred by the board's written designation itself, which carries a direct reporting line to the Board Chair. Before assuming the role, the Focal Point and alternate complete the training required by Section 5.2, and the designation records the working time and access to records the role requires.

6.2 Channels open to everyone. Reports may be made by any person — personnel, program participants, family members, or the public — orally, in writing, or anonymously, through at least two channels, chosen from: **[list channels: direct contact with Focal Point; dedicated email; phone/voicemail; physical suggestion box; web form]**. At least one channel does not run through the staff member or volunteer who delivers the reporting person's services. Every channel is available in **[languages used by your participants]** and in formats participants can actually use, including orally; in choosing and reviewing channels, the Organization asks participants — at intake or through its regular feedback practices — how they would prefer to raise a concern. Information about how to report is posted in service locations and provided to program participants in plain language at intake and at least **[annually]** thereafter. Each channel has a named owner and a checking schedule — **[for example: the dedicated email and the suggestion box are checked at least weekly]** — and each check is recorded in the safeguarding log.

6.3 No retaliation. Retaliation against any person for reporting a concern in good faith, or for participating in an inquiry, is itself gross misconduct under Section 3.

6.4 Acknowledgment. The Focal Point acknowledges non-anonymous reports within **[two]** business days and records every report in the safeguarding log. The log records, for each report: the date received, the action taken, and the outcome.

6.5 Silence review. If **[12]** months pass with no reports of any kind through any channel, the Focal Point conducts a brief, documented review of the reporting system — confirming that channels are still posted, still working, checked on schedule, available in the right languages, and known to participants — and reports the result to the board with the next safeguarding report under Section 9.1. A long silence is treated as information about the system, never as an accusation against personnel: zero complaints sometimes may mean that the system is not working, and sometimes it means nothing has gone wrong. The review exists to tell the two apart.

> ***Guidance (delete after completing):*** *This section asks for about an hour, once a year. Field research finds that reporting channels can exist and still go unused — unknown to participants, in the wrong language, or unchecked for months (see Annex A). An organization that reviews its silence is running its system, not admitting failure: if the review finds the channels sound, record that and move on; if it finds a barrier, fixing it is the system working exactly as designed.*
>
> ***Guidance (delete after completing):*** *Section 6 is modeled on the grievance-official mechanism at 42 C.F.R. § 483.10(j) — the most fully specified reporting channel in U.S. law, currently required only of nursing facilities. The essential features to preserve when adapting: a named person, anonymous filing, defined timeframes, and*

> *channels available to beneficiaries, not just employees. Choosing channels is a design decision, not a menu: Annex A of this policy sets out five requirements, drawn from field evidence, that separate a channel that exists from a channel that gets used.*
>
> *Do not confuse focal point's seniority with suitability. The recurring focal-point failure across the sector is the "letterhead appointment" — a person named to the role without training, time, or real authority. This section is drafted so the role works without a specialist on staff: authority comes from the board's written designation, competence from the Section 5.2 training (deliverable internally; the Project's training outlines, Tool 4), and capacity from the time and access the designation records. Choose the person participants and staff most trust.*

7. Response and Investigation

7.1 Immediate safety. On receiving a report, the Focal Point's first obligation is the safety of the person affected: any immediate protective step, including suspending the implicated person's contact with participants pending inquiry, is taken without waiting for the inquiry to conclude. Interim measures are precautionary, not disciplinary.

7.2 External reporting first. Where a report indicates possible abuse of a child or vulnerable adult, or any criminal conduct, the Organization reports to **[state agency / law enforcement]** within the timeframe required by **[state]** law. Internal inquiry never delays or substitutes for a legally required external report, and the Organization does not conduct its own investigation of possible criminal conduct beyond what is needed to act on employment matters.

7.3 Survivor-centered handling. The person affected is treated with dignity: informed of what will happen next, offered referral to **[local advocacy, medical, and counseling services]**, and never required to confront the person complained about. Confidentiality is maintained on a strict need-to-know basis.

7.4 Inquiry and outcome. For matters handled internally, the Focal Point (or an external reviewer where impartiality requires) conducts a documented inquiry and reports conclusions to **[Executive Director / Board Chair]**. Substantiated violations of Section 3 result in consequences up to and including termination, in accordance with Section 3.1.

7.5 Partner organizations. Where a concern involves personnel of a partner, subgrantee, or referral organization, the Focal Point conveys the concern to that organization's designated safeguarding contact (or leadership), and records that it did so, in addition to any external reporting duty.

8. Working with Partners

8.1 Before entering a partnership, subgrant, or recurring referral arrangement involving contact with the Organization's program participants, the Organization informs the partner of the standards in Section 3 and obtains a written undertaking that the partner accepts equivalent standards for its own personnel.

8.2 Failure by a partner to maintain preventive measures, or to act on reported concerns, is grounds for terminating the arrangement.

9. Accountability, Records, and Review

9.1 Board ownership. The board of directors owns this policy. It receives a safeguarding report at least **[annually / semi-annually]** covering: number and type of reports received, the result of any silence review under Section 6.5, training completion rates, screening compliance, and any policy exceptions.

9.2 Records. Safeguarding records — reports, inquiries, screening confirmations, and training logs — are retained securely for at least **[three]** years, with access restricted to the Focal Point and **[designated roles]**.

9.3 Annual review. The board reviews this policy every 12 months and after any substantiated incident, and records the review in its minutes.

9.4 Honest references. Where a person's engagement ended following a substantiated safeguarding violation, the Organization will not provide a reference that conceals that fact, subject to advice of counsel.

10. Adoption

Adopted by resolution of the Board of Directors of **[Organization Name]** on **[date]**.

_____ — Board Chair — name, signature, date	_____ — Executive Director — name, signature, date

Appendix — How This Policy Maps to the International Standard

Each section of this policy operationalizes specific obligations of the IASC Six Core Principles Relating to Sexual Exploitation and Abuse (adopted 2002; revised 2019), as decomposed into thirteen obligation elements in the companion research (Module 1, Appendix A). The right-hand column identifies the structural gaps in U.S. law, by gap code, that the section closes at the organizational level. This mapping allows funders, evaluators, and boards to verify coverage line by line.

Definitional basis (Section 2). The definitions in Section 2 of sexual exploitation and sexual abuse adopt the United Nations Secretary-General's Bulletin ST/SGB/2003/13, § 1 — the definitional baseline on which the Six Core Principles rest. The definition of child applies the international rule (ST/SGB/2003/13, § 3.2(b)): protection at 18, regardless of the age of majority or age of consent in the applicable state. The definition of sexual harassment takes its operative formulation from United States equal-employment practice (29 C.F.R. § 1604.11(a)) and applies it to program participants — a deliberate extension, documented in the companion research (Module 1, SCP-3.1), because Title VII's harassment protections attach to the employment relationship and do not reach the people an organization serves. Safeguarding, program participant, and Safeguarding Focal Point are operational terms defined for this policy.

How to read this table. Read each row, left to right, as one sentence: *where the rule lives in this policy → which international obligation it fulfils → which precise elements of that obligation → which gaps in U.S. law the section fills for your organization.* The SCP numbers identify the thirteen obligation elements of the Six Core Principles as decomposed in the companion research: the first digit is the principle, the second is the element (so SCP-1.2 is the second element of Principle 1).

The first row, read aloud: *"Sections 3.1 and 7.4 make abuse of a participant a dismissal offense with real, recorded consequences. That fulfils Principle 1 of the international standard (elements SCP-1.1 and SCP-1.2). By adopting these sections, the organization gives itself a rule that U.S. law imposes only on a few licensed sectors (G3), never spells out operationally (G5), and never places on organizations at all (G6)." Every other row works the same way.*

Key to the gap codes (defined in Module 1, §5): **G1** — the duty applies only if the organization takes a particular funding stream; **G2** — the law protects a different group than the program participants safeguarding exists to protect; **G3** — coverage is confined to a licensed or certified sub-sector; **G4** — the duty triggers only after suspected harm, rather than requiring prevention in advance; **G5** — the obligation may

exist in principle, but no law specifies the organizational system that delivers it; **G6** — the duty binds an individual rather than the organization, so there is no institutional accountability.

Policy section	IASC Core Principle	Elements	Gaps addressed (Module 1 codes)
3.1 Gross misconduct; 7.4 Consequences	Principle 1 — SEA as grounds for termination	SCP-1.1, SCP-1.2	G3 sub-sector gap; G5 operationalization; G6 duty placed on the organization
3.2 Children; no mistake-of-age defense	Principle 2 — absolute protection of under-18s	SCP-2.1, SCP-2.2	G1 state-by-state variance; G5; G6 — single internal rule at 18, everywhere
3.3 No exchange for sex, incl. entitled assistance	Principle 3 — no transactional exchange	SCP-3.1, SCP-3.2	G2 population gap; G5; G6 — covers the aid relationship U.S. law does not reach
3.4 No relationships with participants	Principle 4 — power-differential relationships	SCP-4.1	G3 — extends beyond licensed roles to all personnel; G5; G6
3.5, §6, 7.5 Reporting duty and mechanism	Principle 5 — internal reporting via established mechanisms	SCP-5.1, SCP-5.2, SCP-5.3	G1, G2, G3, G4 — a preventive, beneficiary-facing channel with a cross-organization pathway
3.6, 4, 5, 8, 9 Preventive environment and systems	Principle 6 — environment, code promotion, manager duty	SCP-6.1, SCP-6.2, SCP-6.3	G2, G3, G4, G5 — screening, training, partner flow-down, and board accountability specified in advance
3.7 Digital and remote boundaries	Project extension — no IASC equivalent	—	G3 — U.S. rules exist only in bounded sub-sectors (e.g., amateur sports); G5; G6

A note on Section 3.7. Section 3.7 operationalizes no IASC element, and the mapping table says so. The Six Core Principles were adopted in 2002 and do not address digital service delivery; the section extends the framework into territory where the international standard and general U.S. law are both silent. It is retained in the Code of Conduct because the power differential it governs is the same one Principles 3 and 4 govern in person.

Design requirements. Module 1 (§8) concludes that an adequate domestic baseline must be cross-sectoral rather than funding-conditioned; beneficiary-facing rather than employee-facing; portable across sub-sectors; preventive rather than incident-triggered; specified at the operational level; and organizational, with board and executive accountability. This template is built to satisfy all six requirements for an adopting organization.

Annex A — Designing a Reporting Channel People Actually Use

Section 6 states what the policy must contain. This annex is about something the policy text cannot do for you: choosing channels that will be used. The best-documented failure of reporting mechanisms worldwide is not absence but disuse. In field research with survivors in the eastern Democratic Republic of the Congo, complaint mechanisms existed but were unknown to the rural communities they served, hotlines operated only in French where participants spoke local languages, and suggestion boxes went unopened for months (Mwenebayeke, 2024). A 2018 mapping found that fewer than a quarter of affected people in crisis settings could access any reporting channel at all (Reddick, 2021), and actual incidents are estimated to exceed reported ones by a factor of 11 to 128 (Westendorf et al., 2024). None of this is an accusation against any organization. It says one thing: existence is not use, and use is a design outcome. Five requirements follow.

1. At least two channels — and one must sit outside the service relationship. The person a participant most fears reporting may be the person who controls their assistance; the field research documents abusers exploiting exactly that gatekeeper position (Mwenebayeke, 2024). A channel that runs only through program staff asks the participant to hand the report to the system that holds their aid. *The smallest version that works:* the Focal Point's direct phone number printed on the intake sheet, plus a suggestion box that does not sit on the caseworker's desk. Cost: zero.

2. Language and format follow the participant, not the organization. A hotline in a language participants do not speak is decoration. *The smallest version that works:* the one-page "how to report" notice translated into the two languages most used by your participants — and an oral option always open, because literacy is a channel barrier too.

3. Awareness is checked, not assumed. Posting a notice is not the same as being known. *The smallest version that works:* two questions added to an existing feedback form, or asked in person once a year — "If something felt wrong about how you were treated here, would you know where to report it?" and "Would you feel safe doing it?" — with the answers recorded. The Participant Charter (Annex B) is the intake handout that does this.

4. Every channel has an owner and a schedule. An unchecked channel is worse than none: it teaches people that reporting changes nothing. *The smallest version that works:* a named person, a repeating calendar entry, and a line in the safeguarding log each week. Section 6.4's acknowledgment rule then closes the loop with the person who reported.

5. Treat silence as information. Zero complaints sometimes may mean that the system is not working — and sometimes it means nothing has gone wrong. A long stretch of silence is a prompt to re-check requirements 1 through 4, never an accusation against your own people, and never, by itself, a mark of failure. Reporting numbers that rise in the early years of a new system are generally evidence of growing awareness and trust, not of worsening conduct — consistent with UNICEF's experience that improving channel accessibility multiplied the population its mechanisms reached roughly tenfold (Satke et al., 2022). *The smallest version that works:* one documented hour a year, under Section 6.5.

> ***A note on the evidence.*** *The studies cited here come from international operations — the only setting in which reporting-mechanism use has been studied at scale. No equivalent data exist for the U.S. domestic nonprofit sector; that measurement gap is itself a finding of the Project's companion research. Full citations appear in the Project's open-access research at pseacrosswalk.org.*

Annex B — Participant Charter: Our Commitment to You

> ***How to use this page:*** *complete the highlighted fields, translate it into the languages your participants use, and give a copy to every participant at intake — this is the awareness step Section 6.2 requires and indicator E6 of the Self-Assessment checks. Post it where services are delivered. It is written at a plain reading level on purpose; keep it that way when adapting.*

[Organization Name] — Our Commitment to You

Our help is free. You never have to pay for it, work for it, or do favors for it.

No one who works or volunteers here may ask you for money, gifts, favors, or a romantic or sexual relationship — not in exchange for help, and not at all. This is true for every person here: staff, volunteers, drivers, mentors, everyone.

Saying no can never reduce, delay, or take away your services.

If anything anyone here does makes you or your child feel uncomfortable or unsafe, you can tell us. Talk to **[Focal Point name]** directly, or use any of these ways: **[channels]**. You do not have to give your name.

When you tell us, we will listen and take it seriously, and no one is allowed to treat you badly for speaking up. If you tell us about danger to a child or a vulnerable adult, the law may require us to also tell state authorities — that rule exists to protect them.

This promise is part of our official policy, adopted by our board of directors on **[date]**.

Annex C — Notice of Adoption (optional)

> ***How to use this page:*** *after your board adopts the policy, you may — entirely optionally — send this half page to the Project. It takes two minutes. Notices are counted in the Project's open-access research on how safeguarding capacity is spreading across the U.S. nonprofit sector. Sending it creates no obligation, no cost, and no relationship of any kind, and your organization is not named anywhere unless you tick the permission box. The fuller Adopter Feedback Form (Tool 3) remains separate and equally optional.*

Notice of Adoption — U.S. Nonprofit Safeguarding Crosswalk Project

Organization: _____ State(s): _____

On (date) _____, our board of directors adopted a safeguarding policy based on the Crosswalk Project's Policy Template (Tool 1), covering: ☐ Starter policy (Sections 1–3 and 6) ☐ Full policy (Sections 1–9) ☐ An adapted selection

Self-Assessment completed: ☐ Yes — score _____ / 32 (optional to share) ☐ Not yet

☐ You may name our organization as an adopter in open-access research and project materials. *(If unticked, this notice is counted anonymously.)*

Name: _____ Role: _____ Email: _____ Date: _____

Return by email to info@pseacrosswalk.org with the subject line "Notice of Adoption" — attach a photo or scan of this page, or simply type the answers into the body of the email.

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