Marine Habitat Preservation of the Philippines Inc.
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marineconservationphilippines.org

Safeguarding and Anti-Harassment Policy

Marine Habitat Preservation of the Philippines Inc. (Marine Conservation Philippines)

Version	1.0
Approved by the Board	October 2026
Next scheduled review	October 2028 at the latest
Policy owners	Kiri Simons and Jason Matthews, General Managers

1. Purpose and Scope

This policy explains how Marine Conservation Philippines (MCP) protects people from harm connected with our work, and how we prevent and respond to sexual harassment, sexual exploitation and abuse, bullying and discrimination.

It applies to the members of the Board, staff, interns, scholars, volunteers, contractors, partners and visitors whenever they act on MCP's behalf or take part in our activities: on base, in the field, in the communities where we work, while travelling for MCP and online. It also covers conduct outside working hours where it affects people connected with our work.

It protects everyone affected by our work, including community members, students, government trainees, scholars, volunteers, interns and staff.

Children are protected by our Child Protection Policy, which applies alongside this one. Where the two overlap, the stricter rule applies.

2. Our Commitment

Everyone who works with us, joins us or meets us through our work has the right to respect and to be safe from harassment, exploitation and abuse. MCP has zero tolerance for sexual harassment, sexual exploitation and sexual abuse, and we act on every concern raised.

We comply with Philippine law, including the Anti-Sexual Harassment Act (RA 7877), the Safe Spaces Act (RA 11313) and its implementing rules, the Labor Code and the Data Privacy Act (RA 10173). We also meet the safeguarding requirements of our donors and grant agreements.

3. What This Policy Covers

Safeguarding: what we do to protect people from harm caused by our staff, volunteers, partners or activities.

Sexual harassment: any unwelcome conduct of a sexual nature, whether spoken, written, physical, or through phones, messaging or social media. This includes gender-based sexual harassment as defined in the Safe Spaces Act. Examples include unwanted sexual advances, requests for sexual favours, persistent unwanted comments about someone's body or appearance, and sexist, misogynistic, homophobic or transphobic remarks. It does not matter whether something was meant as a joke. What matters is its effect on the person receiving it.

Sexual exploitation: abusing a position of power or trust, or someone's vulnerability, for sexual purposes. This includes offering money, work, training, a certification, a scholarship, goods or favours in exchange for sex or sexual acts.

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

Bullying and harassment: repeated or serious behaviour that intimidates, humiliates or undermines someone, including threats, shouting, deliberate exclusion, spreading rumours and online abuse.

Discrimination: treating a person less favourably because of their sex, gender identity or expression, sexual orientation, ethnicity, nationality, religion, disability, age or similar characteristics.

4. Standards of Behaviour

4.1 Everyone covered by this policy must:

- treat everyone respectfully, regardless of their role, background or nationality;
- respect the culture and people of the communities where we work;
- ask permission before photographing people for MCP, and accept a refusal;
- report any concern about the safety or treatment of a person connected with our work (section 6).

4.2 No one covered by this policy may:

- sexually harass anyone, in person or online;
- sexually exploit or abuse anyone;
- offer or demand money, work, training, a course sign-off, a certification, a scholarship, goods or any favour in return for sex or sexual acts;
- pay for sex or sexual services while living on MCP's base or in housing MCP provides, or while travelling on MCP's behalf anywhere, on or off duty;
- engage in sexual activity with anyone under 18, whatever the local age of consent and whatever they believe the person's age to be;
- bully, threaten, intimidate or humiliate anyone;
- discriminate against anyone;
- take, share or post intimate or degrading images of anyone, or any image against the wishes of the person shown;
- misuse their role at MCP to get money, gifts, favours or sex from someone who depends on them or on MCP;
- retaliate against anyone who raises a concern or helps with an investigation.

Some of these standards also apply off duty, because people in the communities where we work associate what our staff and volunteers do in their free time with MCP.

4.3 Positions of Trust

Staff who train, assess, supervise or make decisions about others hold real power over them, whether over a certification, a scholarship, a job or a stay. To protect both sides:

- Staff must not begin a sexual or romantic relationship with anyone they are currently training, assessing, supervising or making decisions about, including volunteers, interns, scholars and government trainees.
- An existing relationship of this kind must be declared to a General Manager, so that training, assessment or supervision can be handed to someone else. Declaring a relationship is not a disciplinary matter. Hiding one can be.
- A sexual relationship between staff and a community member receiving support or services from MCP is prohibited where it involves any misuse of position, and any such relationship must be declared to a General Manager.
- Relationships between adult volunteers, or between colleagues of equal standing, are a private matter, as long as they are consensual and do not affect others or our work.

4.4 Consent

Consent must be given freely and can be withdrawn at any time. Someone who is asleep, unconscious or too intoxicated to decide cannot give consent. For the purposes of this policy, no one under 18 can give consent.

5. How We Prevent Harm

5.1 Safe Recruitment

- We obtain references for new staff and ask referees about any conduct concerns.
- Staff who teach children, or who may be alone with them, need police clearance.
- Employment contracts and agreements with interns, scholars and volunteers refer to this policy.

5.2 Induction and Training

- All staff members are introduced to this policy in their first week, using a short summary in English or Cebuano, and sign an acknowledgement, together with the Child Protection Policy.
- Members of the Committee on Decorum and Investigation receive training to carry out their role.

5.3 On Base and in the Field

- Anyone who feels unsafe, or is treated badly by someone in their room, team or dive buddy pairing, can speak to a staff member. We will ask what has happened and, where needed, change rooms, teams or buddy pairings. This is for safety or behaviour concerns, rather than personal preferences.
- Staff are present for all activities involving community members or children.

5.4 Partners and Contractors

We share this policy with partners and contractors who work with people on our behalf. Our agreements require them to follow its standards and report any concern to us.

5.5 Images and Stories

We ask for consent before using anyone's photo or story in our communications. For images of children, we follow the Child Protection Policy. We never publish anything that could identify a person who has raised a concern.

6. Raising a Concern

6.1 Anyone can raise a concern about something they experienced, saw or heard about, even if they have no connection to MCP. No proof is needed, only a genuine concern.

6.2 Staff, interns and volunteers must report any concern about sexual exploitation or abuse, or about the safety of a child, straight away. Everyone is encouraged to report harassment they experience or witness.

6.3 Concerns can be raised with:

- one of the General Managers;
- a director, particularly if the concern involves management;
- a member of the Board;
- any member of the Committee on Decorum and Investigation, for sexual harassment concerns (section 8);
- any channel of our Grievance Mechanism, including anonymously.

6.4 If someone is in immediate danger, call 911 and alert the nearest staff member.

6.5 Concerns about a General Manager go to a director or a Board member. Concerns about a director go to another director or a Board member.

7. How We Respond

7.1 Our Approach

We put the safety, wishes and dignity of the person affected first. We listen, take the concern seriously, explain what will happen next, and share information only with those who need it. We never ask the person to confront the one they are reporting. As far as the law allows, they decide whether to involve the police.

7.2 Immediate Steps

We make sure the person is safe, separate those involved where needed, for example by changing rooms, teams or schedules, and help them reach medical care, counselling, the police or their embassy if they wish.

7.3 Investigation

- Complaints of sexual harassment are investigated and decided by the Committee on Decorum and Investigation (section 8).
- For other safeguarding concerns, a director appoints someone independent of the matter to investigate promptly and confidentially.
- Concerns involving children are handled under the Child Protection Policy, including referral to the authorities when required by law.
- The person reported is told about the complaint and has a fair chance to respond before any decision is made.

7.4 Outcomes

Confirmed cases lead to action proportionate to their seriousness:

- **Staff:** a verbal or written warning, suspension or dismissal, following due process under the Labor Code. Sexual exploitation, sexual abuse and serious sexual harassment are gross misconduct and normally lead to dismissal.
- **Interns, scholars and volunteers:** a warning, or ending their placement or scholarship.
- **Contractors and partners:** ending the contract or partnership.

We refer possible crimes to the police with the consent of the person affected, or without it where the law or someone's safety requires it.

Knowingly false reports are a disciplinary matter. Concerns raised in good faith never are, even if they are not confirmed.

7.5 Donors

We inform donors of safeguarding incidents connected to the projects they fund, as required by their agreements, without identifying the people affected unless those people agree.

7.6 Learning

After every case, the General Managers review what we can improve and report it to the Board.

8. Committee on Decorum and Investigation (CODI)

8.1 As required by RA 7877 and RA 11313, MCP has a Committee on Decorum and Investigation to help prevent sexual harassment and to investigate and decide on complaints.

8.2 The committee:

- includes representatives of management, supervisory staff, rank-and-file staff and any staff union;
- is headed by a woman, and at least half of its members are women;
- is impartial: any member connected or related to someone involved in a case steps aside for that case. If the head steps aside, the committee appoints another woman member to lead the case.

8.3 Members are appointed by the Board for two years.
Head: Kiri Simons, General Manager
Members: Magnus Nielsen, Bethel Benjamin, Euan Finlay

8.4 For each complaint, the committee:

- investigates and reaches a decision within ten days of receiving it;
- follows due process and hears both sides;
- protects the complainant from retaliation;
- keeps the case confidential to the greatest extent possible;
- recommends the penalty to a director who did not sit on the case, or to the Board if the person reported is a director.

8.5 The same procedure applies to complaints from or about interns, scholars and volunteers.

9. Confidentiality and Records

Records of concerns and cases are kept securely, and only the people handling a case can see them. We handle them in line with the Data Privacy Act and keep them for at least ten years.

10. Protection from Retaliation

Anyone who raises a concern in good faith or helps with an investigation will not be punished or disadvantaged because of it, or have their job, stay, scholarship or partnership affected. Retaliation is itself a serious breach of this policy.

11. Responsibilities

The Board approves this policy, oversees its application and receives an anonymised summary of cases every year.

The General Managers are responsible for putting it into practice, including induction, receiving concerns, supporting those affected, keeping the safeguarding log, passing cases to the right process and making sure committee members are trained.

The Committee on Decorum and Investigation carries out the duties in section 8.

Everyone covered by this policy must follow it and report concerns.

12. Related Documents

This policy works alongside our Child Protection Policy and our Grievance Mechanism. All our policies are published at marineconservationphilippines.org/policies/.

13. Review

The Board reviews this policy at least every two years, and sooner if needed, including after any confirmed case. Before approval and after any major change, we share the short summary with all staff, who can comment to any committee member within two weeks.