
Safeguarding Policy

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1. Policy Overview

Democracy Reporting International staff must treat their programme recipients, partners, and fellow staff members with respect and dignity. In order to do so, they must not abuse others. This includes physical, emotional, or sexual abuse; sexual exploitation; sexual harassment; and neglect. If they are found to have abused others, they will face strict consequences.

DRI staff must report any instance where they may suspect or notice signs of abuse.

DRI programme recipients and partners are also encouraged to report any signs of abuse.

How to report:

Reporting Abuse:

- In-person to the Safeguarding Focal Point
- Through the dedicated email address ReportingAbuse@democracy-reporting.org
- Through the 'Safeguarding Reporting Form'

Once a report is made, the Safeguarding Focal Point will manage the next steps together with the Director of HR and Administration. This includes coordinating any necessary assistance for the victim, gathering information for the case, and sharing with the Executive Management/Board/external agencies for the final decision.

Please note that all reporters and victims of abuse will be supported throughout the process. This also includes maintaining their anonymity as much as possible.

2. Introduction

This Safeguarding Policy establishes a set of definitions, protocols, and practices to guide the conduct and decision-making of DRI staff and other defined stakeholders regarding incidents of or concerns about abuse. This policy defines prohibited behaviour, establishes what is expected of DRI staff and defined stakeholders regarding safeguarding and lays out the actions that DRI will undertake in the case of a breach of this policy.

2.1 Scope of this Policy

This policy applies to anyone who works for or represents DRI. This includes all DRI staff members¹ in Headquarters and all Country Offices. It also includes representatives of DRI, including but not limited to DRI board members, shareholders, experts, trainers, facilitators, speakers, authors etc. during the time that they work for or in the context of their representation of DRI. This policy uses the terms “staff” or “staff and defined stakeholders” as relevant.

DRI commits to this policy and to actively engaging in its implementation:

- DRI staff must adhere to this policy as a prerequisite for employment. The policy will be annexed to all (employment) contracts. In addition, staff will receive regular knowledge sharing and mandatory trainings on safeguarding issues, organized and documented by the Safeguarding Focal Point.
- DRI partners will be informed of this safeguarding policy as part of their contractual agreements with DRI, including all sub-grantee or third-party contracts. DRI partners are defined stakeholders under this policy and must adhere to it as a prerequisite for working with DRI.
- DRI external stakeholders, including programme recipients, are encouraged to access this safeguarding policy on DRI’s website. From here, programme recipients can inform themselves of the policy and the options for reporting concerns or incidents.

This policy will be reviewed and updated in line with statutory obligations and best practice every two years. **DRI’s Executive Management (EM) team** are ultimately accountable for this policy and its implementation; the Director of HR and Administration is the leading responsible EM team member. **DRI’s Board** is responsible for the oversight of this policy’s implementation. DRI’s EM has appointed a **Safeguarding Focal Point (SFP)** and delegated responsibility for coordinating the implementation of this policy to the SFP. At country office level, **Country Directors/Country Representatives** (including **Office Directors** and **Programme Directors**, where applicable) are responsible for the implementation of this policy and its associated procedures. Country Directors, Country Representatives, Office Directors and Programme Directors are responsible for appropriate referrals and information-sharing with the SFP. They are not responsible for holding investigations at any level.

¹ This includes employees in registered offices and HQ; international and national inhouse experts (i.e., staff members in non-registered DRI offices); and volunteers

The **Safeguarding Focal Point (SFP)** is the main contact for all aspects regarding the Safeguarding Policy and safeguarding practice within DRI. For more information on the responsibilities of the SFP, see Annex I.

3. Definitions

3.1 Safeguarding

Safeguarding at DRI refers to the prevention of, mitigation of, and response to abuse perpetrated by a staff member or defined stakeholder against children or adults (especially vulnerable adults) through the delivery of DRI's programmes or in the communities we serve. Specifically, safeguarding aims to prevent physical, emotional, or sexual abuse; sexual exploitation; sexual harassment; and neglect perpetrated by or towards any person who represents DRI as a staff member or defined stakeholder.²

3.2 Abuse

Abuse is a violation of an individual's human and civil rights by any other person or persons, as far as human rights apply between individuals. It can take the form of physical, emotional, or sexual abuse; sexual exploitation; sexual harassment; or neglect, resulting in actual or potential harm to the health, survival, development, or dignity of a person. Abuse can be a single act or repeated acts and can be unintentional or deliberate. Abuse often involves criminal acts.³

The following definitions apply for physical, emotional, or sexual abuse; sexual exploitation; sexual harassment; and neglect:^{4 5}

Physical abuse: any actual or threatened physical harm. It includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm, misuse of medication, restraint, or inappropriate sanctions.

Emotional abuse: any emotional maltreatment of another. It includes threats of harm or abandonment, deprivation of contact, humiliation, bullying, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Sexual abuse: the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It includes sexual slavery, child abuse and sexual assault.

Sexual exploitation: any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. It includes trafficking and exploiting adults into transactional sex (also known as prostitution).

Sexual harassment: any unwelcome conduct of a sexual nature that causes offense or humiliation, such as unwelcome sexual advances, requests for sexual favours, and other verbal or physical sexual conduct. It may occur in the workplace or in connection with work. While typically involving a pattern of conduct, sexual harassment may take the form of a single incident. In assessing whether the conduct causes offense, the perspective of the victim shall be considered.

Neglect: the persistent failure to meet a vulnerable person's basic physical and/or emotional needs, likely to result in the serious impairment of their health or development. It includes

² Source: Open Briefing

³ Source: <https://www.vsointernational.org/about/policies-and-statements/safeguarding-and-child-protection>

⁴ Source: <https://www.un.org/preventing-sexual-exploitation-and-abuse/>

⁵ Source: <https://www.safeandsoundgroup.org.uk/about-safe-and-sound/safeguarding-policy/>

failure to protect from physical or psychological harm and failure to ensure access to appropriate medical care or treatment.

This is not an exhaustive list, i.e., any other forms of abuse are also prohibited under this policy.

All forms of abuse can be carried out on the following groups:

- colleagues and partners (defined in this policy as DRI staff and defined stakeholders)
- beneficiaries (individuals who are outside of DRI staff and defined stakeholders, i.e., the people DRI serves/programme recipients).

4. Standards

4.1 Prevention of Abuse

DRI has a zero-tolerance policy towards abusive acts being perpetrated by or on our staff or anyone associated with the delivery of our programmes. All DRI staff and defined stakeholders are bound to uphold this policy and have a duty to report incidents that they believe contravene it. Additionally, DRI supervisors have a duty to ensure that allegations of abuse are referred for investigation. DRI supervisors are responsible for carrying out any action points or recommendations resulting from an investigation.

DRI has a duty to provide appropriate and confidential assistance to victims/survivors of abuse perpetrated by or on our staff or anyone associated with the delivery of our programmes.

4.2 DRI Safeguarding Core Principles

DRI staff are bound by the Safeguarding Core Principles:

1. DRI staff must not commit acts of abuse, including physical, emotional, or sexual abuse; sexual exploitation; sexual harassment; or neglect at any time. Abuse constitutes serious misconduct and, as a breach of this policy, is grounds for disciplinary action.
2. Sexual activity with children (persons under the age of 18) is prohibited, regardless of the local age of consent. Mistaken belief in the age of a child is not a defence.
3. Engaging with adults exploited into transactional sex (also known as prostitution) is prohibited.
4. DRI staff have a duty to report any instance where they may suspect or detect signs of abuse using the appropriate channels as set out in this policy.
5. DRI has a duty to protect those who report suspected abuse and the suspected victims/survivors.
6. DRI staff, especially supervisors at all levels, must create and maintain an environment that supports the prevention of abuse. Supervisors have a duty to promote the implementation of this Safeguarding Policy.
7. In our use of information and visual images, both photographic stills and video, our overriding principle is to maintain the respect and dignity in our portrayal of children, adults (especially vulnerable adults) and communities.

5. Breaches of the Safeguarding Policy & Reporting Procedures

5.1 Obligations

1. **All staff** are obligated to:
 - a. Be aware of this policy
 - b. Comply with this policy
 - c. Report breaches of this policy using the channels set out in this policy
 - d. Cooperate with investigations
2. **Supervisors** are obligated to promote this policy and be aware of their collective duty of care. They must:
 - a. Ensure that all allegations of abuse are referred appropriately using the channels set out in this policy. Supervisors must refer quickly and fairly, regardless of whom the concern or allegation involves.
 - b. Ensure that mandatory action points, including disciplinary measures arising from completed investigations, are implemented.
3. DRI's **Executive Management (EM)** and the **Safeguarding Focal Point (SFP)** are responsible for the implementation of this policy and will hold all staff accountable for compliance with its terms (for further details, see paragraph 1.1).
4. All **DRI partners** are obligated to ensure that they do not engage in, condone, or tolerate abuse with respect to DRI staff or anyone associated with the delivery of DRI's programmes. Partners are defined stakeholders and must acknowledge and adhere to DRI's policy as a prerequisite for working with us.

5.2 Reporting Procedures for Potential Breaches of this Policy

In cases of potential incidents of abuse, different reporting procedures apply, based on the type of abuse and the victim, as set out below.

An incident of abuse towards **beneficiaries (i.e., the people DRI serves/programme recipients)** must always be reported.

An incident of abuse towards **DRI staff and/or defined stakeholders** has slightly different reporting procedures, depending on the form of abuse:

- Physical abuse, sexual abuse, sexual exploitation, or neglect must always be reported via the formal reporting route (see 5.2.1).
- In the case of emotional abuse or sexual harassment, the victim/survivor has the choice of reporting in an informal route in addition to the formal route (see 5.2.2).

In all cases, the following terms apply:

- **Victim/survivor:** an individual who has been subject to or alleges an incident of abuse. They are typically, but not exclusively, children and vulnerable adults.
- **Reporter:** an individual who reports an incident of or concern around abuse. A reporter may be referred to as a whistle-blower. A reporter might be a victim/survivor.
- **Perpetrator/alleged perpetrator:** an individual who is found to have or is alleged to have committed an act of abuse. Alternative terminology includes subject of complaint or alleged abuser.

- **Formal Report:** the official means of notifying the SFP and DRI of a safeguarding concern or incident, either in-person, through the dedicated email address, or through the reporting form on the DRI homepage.
- **Informal Guidance:** the unofficial means by which a victim/survivor discusses an emotional abuse or sexual harassment concern or incident with the SFP and seeks advice. This is only available in the case of emotional abuse or sexual harassment (not for physical abuse, sexual abuse, sexual exploitation, or neglect).

5.2.1 Reporting Potential Incidents of Physical Abuse, Sexual abuse, Sexual Exploitation, or Neglect

Anyone who suspects physical abuse, sexual abuse, sexual exploitation, or neglect is required to report it. Do not remain silent. There are multiple options to report:

- In-person to the Safeguarding Focal Point
- Disclosure through a dedicated email address ReportingAbuse@democracy-reporting.org
- Using the 'Safeguarding Reporting Form' on the DRI homepage

All avenues of reporting are equally secure and monitored by the SFP personally (not automated).

What to Report:

A reporter is not required to hold any particular information about the situation they are reporting. If they are in possession of the information, a reporter should share:

- Who committed the suspected physical abuse, sexual abuse, sexual exploitation, or neglect? (Provide full names, titles and organization, if possible).
- Who was involved (potential victim/survivor(s))? Were there any witnesses?
- What happened?
- Describe any known details of the incident or allegation.
- When and where incident(s) took place, providing dates, times and locations.

When reporting an incident of physical abuse, sexual abuse, sexual exploitation, or neglect, staff and programme beneficiaries should remember:

- That proof is not necessary before reporting, but all reports must be made in good faith
- Not to investigate. Reporters should not contact the alleged perpetrator(s) directly in an effort to determine facts, demand explanations, or retaliation
- To always maintain strict confidentiality, including not discussing the issue with anyone within DRI (other than through the reporting channels set out in this policy) or outside of DRI (except as required by law)
- To respect the dignity, wishes and rights of those affected by physical abuse, sexual abuse, sexual exploitation, or neglect
- That the confidentiality of the reporter, the alleged victim/survivor, and the alleged perpetrator will remain as confidential as possible (circumstances permitting) during and after the reporting procedures.

5.2.2 Reporting Potential Incidents of Emotional Abuse or Sexual Harassment

An incident of emotional abuse or sexual harassment towards **beneficiaries** (i.e., the people DRI serves/programme recipients) must always be reported via the avenues above.

An incident of emotional abuse or sexual harassment towards **DRI staff and/or defined stakeholders** has slightly different reporting options. Any staff member or defined stakeholder who is subject to emotional abuse or sexual harassment at DRI has two options: seeking informal guidance or filing a formal report.

Informal Guidance

Any staff member or defined stakeholder who is subject to emotional abuse or sexual harassment is encouraged to, if possible, inform the alleged perpetrator that the conduct is unwanted and unwelcome. This may stop the harassing behaviour.

The victim/survivor may seek informal guidance in the form of advice from the Safeguarding Focal Point about how to proceed, without necessarily filing a formal report. This could include deciding with the support of the SFP that they wish to seek resolution through mediation by a third party, such as the SFP or Director of HR and Administration. All information shared will be handled discreetly and with care.

Formal Report

If the matter is not suitable for mediation; if the victim/survivor considers that the informal guidance was unsuccessful; or if a victim/survivor does not wish to seek informal guidance, a victim/survivor may seek advice from the Safeguarding Focal Point about filing a formal report.

Again, there are multiple options to formally report a potential incident of emotional abuse or sexual harassment:

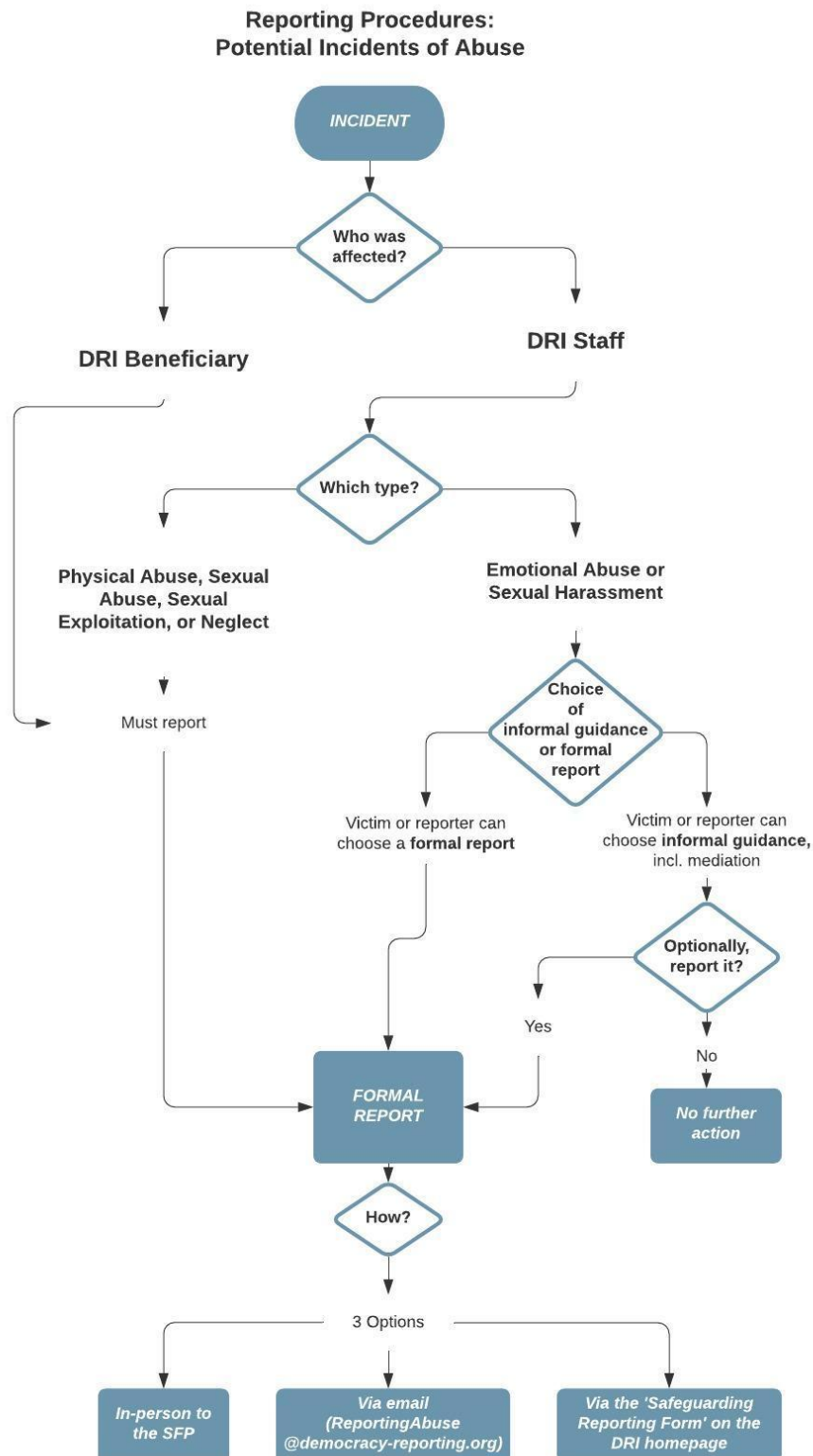
- In-person to the Safeguarding Focal Point
- Disclosure through a dedicated email address ReportingAbuse@democracy-reporting.org
- Using the 'Safeguarding Reporting Form' on our homepage

All avenues of reporting are equally secure and are monitored by the SFP personally (not automated).

What to Report:

- **Who** committed the suspected emotional abuse or sexual harassment? (Provide full names, titles and organization, if possible).
- **Who** was involved (potential victim/survivor(s))? Were there any witnesses?
- **What** happened?
 - Describe in detail what is known or suspected about a sexual harassment incident.
- **When** and **where** incident(s) took place, providing dates, times and locations.

DRI recognizes that staff and defined stakeholders may become aware of a potential incident of abuse through differing means, such as in person, via email accounts (personal, DRI individual and DRI general), or via social media accounts. In all cases, staff must maintain strict confidentiality and never share or forward the message (either internally or externally). They must instead report the incident or allegation via one of the designated channels set out in this policy.



5.3 What Happens When a Report is Submitted

All reports of abuse are treated seriously and with care. The Safeguarding Focal Point manages all steps of the process, from receiving and reacting to the formal report, to closing the case and logging lessons learnt.

Receiving the Formal Report

The Safeguarding Focal Point will receive the formal report either in person, via the dedicated email address, or via the 'Safeguarding Reporting Form' on DRI's homepage.

If receiving it in person, the SFP will take the following steps:

- listen carefully, accept the account and refrain from giving a personal opinion in relation to the concern
- record in writing all details that the reporter is willing to give
- invite further information without asking leading questions or pressuring the reporter
- reassure the reporter that the concern will be handled immediately and shared among relevant staff on a 'need to know' basis only. The reporter will be informed that their disclosure will not be entirely confidential due to the process of assessing and investigating the claim
- record all available contact information, including the reporter, the alleged perpetrator, and any witnesses or others who might corroborate the report
- inform the reporter that they will get back to them within 72 hours to confirm next steps, which may include commencement of an investigation
- file the report in a 'Safeguarding Reporting Form'
- inform at least one member of Executive Management that a report has been filed and that an initial assessment will begin

If receiving a report via the dedicated email address or via the 'Safeguarding Reporting Form' on DRI's homepage, the SFP will take the following steps:

- confirm receipt of the email or form within 24 hours
- reassure the reporter that the concern will be handled immediately and shared among relevant staff on a 'need to know' basis only. The reporter will be informed that their disclosure will not be entirely confidential due to the process of assessing and investigating the claim
- inform the reporter that they will get back to them within 72 hours to confirm next steps, which may include commencement of the investigation
- file or add to the report in the 'Safeguarding Reporting Form' as necessary
- inform at least one member of the Executive Management that a report has been filed and that an initial assessment will begin

Reacting to the Formal Report

Once a 'Safeguarding Reporting Form' (which also records the contents of a disclosure via an in-person meeting or the dedicated email address) is received by the SFP, they will:

- Allocate a unique reference number to the case
- Log every action and collate correspondence (all hard copies will be stored in a locked file)

- Set up an Initial Assessment with the Director of Administration and Human Resources. The Executive Director will be informed immediately about the case and the planned steps.
 - If the Director of HR and Administration is part of the complaint, the SFP will set up the assessment with the Executive Director; if the Executive Director is part of the complaint, the SFP and Director of HR and Administration will contact the responsible board member.
 - The purpose of an **Initial Assessment** is to establish if there are sufficient grounds to carry out further fact-finding which could confirm if there was an incident of abuse.

Potential outcomes of an Initial Assessment are:

- **NFA** – no further action. If the SFP and Executive Management member (usually the Director of HR and Administration) conclude that the Safeguarding Reporting Form does not reference a safeguarding concern or incident, this will be noted on the form, the case will be closed, and the reporter will be informed of this outcome in writing.
- **Fact-finding** – the SFP will collect basic information in order to clarify the nature of the concerns in the Safeguarding Reporting Form to determine if there is enough evidence to commission a formal enquiry.
- **Low Threshold** – a low threshold case is one in which the SFP and Executive Management member conclude that the required action points are internal and low level, such as advice, support, training or performance management.
- **High Threshold** – a high threshold case is either:
 1. one in which the SFP and Executive Management member conclude that an instance of abuse did occur. In this scenario, sanctions and disciplinary measures will follow.
 2. one in which the SFP and Executive Management member conclude that the matters are beyond the scope of DRI to investigate and manage. In this case, experienced external expert input can be requested to undertake the investigation. Depending on the outcome of the external investigation, DRI Executive Management will decide upon which sanctions or disciplinary measures will be applied.
- **Partner Investigation** – a case is lodged against DRI as an organization. In this case, DRI will invite partners to investigate the case as they see fit.

Closing a Case

The SFP can consider a safeguarding case to be closed under the following circumstances:

- it is judged to be **NFA**
- all **Low Threshold** action points are completed and logged
- its **High Threshold** status results in a referral to an external agency, such as the police or a social care agency, which takes over responsibility for the case. Although it is then considered closed by DRI, follow-up action points such as disciplinary processes, Victim/Survivor Assistance, or staff training may be necessary.

In all cases, the Safeguarding Focal Point will inform the reporter and the victim/survivor(s). Depending on the type of decision, and severity of the breach, the reporter and the victim/survivor(s) may not be informed of the final outcome or the consequences for the perpetrator, for confidentiality reasons.

In all cases, paperwork and digital records will be securely held and filed by the Safeguarding Focal Point, who will maintain a detailed register of safeguarding issues raised and relevant outcomes. Data is kept confidential but is subject to being shared upon request and in anonymized format, with DRI's Executive Management or board.

Concluding Steps

a. Lessons Learned

A thorough review meeting between the SFP and members of Executive Management will be held after every safeguarding case, in which learning will be explored and actioned, so that DRI's policies and procedures are updated accordingly. An anonymized overview of complaints, cases and lessons learned will be shared in the annual report to the board. The aim is to identify and implement preventative measures, so that DRI and defined stakeholders avoid future cases.

b. Victim/Survivor Assistance and Support

The SFP will support all parties of a safeguarding allegation or incident, including alleged perpetrator(s), but especially victim/survivor(s). The SFP will provide appropriate assistance and support in a timely manner, either through internal or external means (such as [Open Briefing's Wellbeing and Resilience services](#)).

c. Supporting Whistle-blowers

DRI recognizes that those who raise concerns (reporters, survivors, witnesses, and advocates) often face challenges following a disclosure. DRI and the SFP will prioritize the safety, wellbeing, and anonymity (if possible) of all whistle-blowers and those working on a case.

If a whistle-blower feels that their concern has not been handled appropriately or that they were the subject of retaliation as a result of raising a concern, they may lodge a complaint with any member of Executive Management (EM). Complaints of this nature will be processed by the Safeguarding responsible on the EM team (usually the Director of HR and Administration) and a member of DRI's board. Once the EM member and board member have reached a decision, they will share the outcome with the whistle-blower.

5.4 Sanctions & Disciplinary Measures

Anyone who has been found to have breached this policy/committed abuse is liable to any of the following sanctions, depending on the severity of the breach:

1. Meeting with a member of Executive Management and a written warning
2. Dismissal/termination/repatriation to their home country
3. Legal Action (referral to the relevant law enforcement or social care agency).

5.5 Confidentiality and Protections from Retaliations

DRI has introduced this procedure to enable staff and defined stakeholders to raise or disclose concerns of abuse at an early stage and in a clearly defined manner. This policy applies in all cases where genuine concerns of abuse exist, regardless of where this may be and whether the information involved is confidential or not.

If a member of DRI staff or a defined stakeholder has a genuine concern of a breach of this policy and has a reasonable belief it is in the public interest, even if it is later discovered that they were mistaken, under this policy they will not be at risk of any form of retaliation. This assurance will not

be extended to an individual who maliciously raises a matter they know to be untrue or who is involved in any way in the breach.

All inquiries, reports and investigations are treated confidentially. Moreover, only staff directly connected to the report will receive information about the investigation process and outcome and must adhere to strict confidentiality processes. The confidentiality of the reporter, the victim/survivor, and the alleged perpetrator will be maintained to the extent possible (circumstances permitting) during and after the reporting procedures.

5.6 Risk Mitigation

Whenever DRI operations, programmes and project activities include children and vulnerable adults, a risk assessment will be conducted. In such cases, risk mitigation strategies will be developed, which minimise the risk to children and vulnerable adults, and incorporated into the design, delivery and evaluation of programmes, operations and activities which involve or impact upon children and vulnerable adults.

Annex 1

Safeguarding Focal Point: Background and Responsibilities

Safeguarding Focal Point: Background

The Safeguarding Focal Point (SFP) is a role which is appointed by Executive Management based on background, knowledge and skills. The appointed staff member must be adept at handling safeguarding issues and managing safeguarding procedures at DRI. Relevant skills include:

- Developing DRI's Safeguarding Policy and understanding DRI's Gender Policy
- Holding the appropriate skills, knowledge, and prior experience, with passion to be able to deliver on the Safeguarding Policy Focal Point responsibilities (see below)
- Demonstrating an ability to maintain confidentiality where appropriate and knowing its limits, seeking appropriate input to aid decision-making on a 'need to know' basis and referring on when a case is beyond the remit of an internal process
- Holding personal values, ethics, and attitudes which are in alignment with the principles of the Safeguarding Policy and DRI's organisational values
- The ability to reflect on their value system and take account of potential biases towards individuals (including children and young people) in all their diversity
- Having the authority and ability to challenge inappropriate behaviour at all levels
- Functioning as an appropriate advocate and role model for DRI at all times
- Displaying good coordination, communication and facilitation skills

Safeguarding Focal Point: Responsibilities

- Act as an ambassador and role model of the Safeguarding Policy at all times
- Provide guidance and support to all staff to ensure that policy measures are integrated into DRI's organizational culture and that risks are identified and mitigated
- Ensure that all staff are informed of the policy, including their individual obligations, by organizing ongoing briefings, inductions, and trainings on the topic
- Ensure that all partners and defined stakeholders are informed of the policy and adhere to it
- Coordinate with programme managers to ensure that DRI's safeguarding measures are integrated into its activities
- Manage reports of abuse, according to section 5.3 above
- Manage the register of cases and reflect on lessons learnt, in order to prevent future cases
- Continuously review and develop the Safeguarding Policy and procedures in line with current best practices and global guidelines