

SAFEGUARDING POLICY

PMH-POL-PROT-001 · Policy for the protection of people

PONT DE MER HUMANITAIRE

International name in use: HUMAN SEA BRIDGE

UNOFFICIAL ENGLISH TRANSLATION



Association	Pont de Mer Humanitaire — Human Sea Bridge
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Courtesy translation — not legally binding. This English text is provided for information only, to help beneficiaries, partners and funders outside France understand how the association protects the people it supports. The only authoritative text is the French version of the policy (*Politique de protection des personnes – Safeguarding*) in force since 28 July 2026. In the event of any discrepancy or difference of interpretation, the French version prevails. Reports may be made in any language (Article 12).

Controlled document — this translation corresponds to the version of the policy in force since 28 July 2026 and will be updated whenever the French text is amended. Translation prepared in October 2026; terminology revised on 9 October 2026.

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PREAMBLE

Pont de Mer Humanitaire (Human Sea Bridge) supports people in vulnerable situations, particularly in the context of complex medical care pathways, and among them children and vulnerable adults. This operational reality requires the association to meet a particularly high standard in protecting the people it supports.

This policy implements Article 81 of the internal rules (*règlement intérieur*) (“Protection of beneficiaries”, RI-A017) and forms part of the level 3 document corpus defined by the Document Reference Framework (institutional policies). It also responds to an explicit expectation of the association’s funders and institutional partners (BAI-005, BAI-011).

It applies from its adoption, without waiting for the Board of Directors to be set up, given the priority nature of the protection of beneficiaries in view of the activities already carried out by the association (see Article 20).

Pont de Mer Humanitaire considers that everyone has the right to be supported in an environment that is safe, respectful and free from any form of exploitation, abuse, violence, harassment or discrimination. The protection of people is a collective responsibility binding on every person acting on behalf of the association.

CHAPTER 1 – GENERAL PROVISIONS

Article 1 – Purpose

This policy sets out the principles, rules and mechanisms that Pont de Mer Humanitaire implements to prevent any form of exploitation, abuse or mistreatment of the people it supports, and to enable any such situation to be reported and dealt with.

Article 2 – Scope

This policy applies:

- to any person benefiting from the action of the association, as well as to their family and relatives where they are involved in the support provided;
- to any person acting on behalf of the association, whatever their status: directors, members of the Bureau, employees, volunteers, interns, civic or international solidarity volunteers (*volontaires*), consultants, service providers, local focal points (in particular the focal point based in Cairo);
- to any partner organisation acting jointly with the association in the context of a care pathway or coordinated support, within the limits of the applicable contractual commitments.

The association ensures, as far as its means and the applicable contractual commitments allow, that its partners share protection requirements compatible with the principles of this policy. It applies in France as in any country where the association operates or engages local correspondents.

Article 3 – Foundations

This policy implements in particular:

- the articles of association (PMH-GOV-GOV-001), which make endangering beneficiaries a serious ground for expulsion (Art. 16) and allow a precautionary suspension to protect people (Art. 17);
- the internal rules (PMH-GOV-GOV-002), in particular Article 81 (protection of beneficiaries – RI-A017), Article 47 (adoption of institutional policies) and Articles 62–63 (protection of people and duty to report, applicable more broadly to volunteers, employees and persons taking part in the association’s activities);
- the Doctrine and Governance Principles (PMH-GOV-GOV-003), which identifies the policy for the protection of beneficiaries (safeguarding) among the level 3 institutional policies;
- the expectations expressed by the association’s funders and institutional partners regarding prevention and reporting (BAI-005) and a complaints channel accessible to beneficiaries (BAI-011).

Article 4 – Definitions

For the purposes of this policy:

- “Beneficiary” means any natural person supported by the association, directly or through their family, within the scope of its purpose.

- “Minor” means any person under the age of eighteen, whatever the law applicable in their country of residence.
- “Vulnerable adult” means any adult whose medical, psychological, social, administrative or economic situation reduces their ability to protect themselves or to consent freely.
- “Exploitation and abuse” means any behaviour, action or omission that undermines the dignity, physical or psychological integrity, safety or fundamental rights of a beneficiary, including any form of sexual exploitation or abuse, harassment, physical or psychological violence, discrimination, neglect, degrading or humiliating treatment, or any consideration demanded in exchange for assistance.
- “Report” means any communication, made in good faith, bringing to the association’s attention a situation falling within the scope of this policy.

Article 5 – General principles

The association acts with respect for the dignity, safety, fundamental rights and privacy of the people it supports. It applies zero tolerance to any form of exploitation or abuse committed by a person falling within the scope of this policy.

It ensures that the protection of people takes precedence over any other consideration, in particular operational, financial or institutional communication considerations.

The association also ensures that its decisions, interventions, partnerships and communication do not expose the people it supports to additional risks. It applies the principle of causing no harm (“Do No Harm”).

Article 6 – Safeguarding principles

This policy rests in particular on the following principles:

- the best interests of the person protected;
- risk prevention;
- confidentiality;
- proportionality;
- no retaliation;
- individual and collective responsibility;
- continuous improvement;
- respect for the dignity and autonomy of the people supported.

CHAPTER 2 – CONSENT AND PROTECTION OF PEOPLE

Article 7 – Free and informed consent

Any intervention by the association with a beneficiary is based, as far as possible given the medical or humanitarian context, on their free and informed consent, or on that of their legal representative where the person is a minor or unable to express their wishes.

Consent is obtained in a language and in a form the person concerned can understand. Consent is sought at each important stage of the support where the situation allows. It may be withdrawn at any time, without such withdrawal calling into question the continuation of humanitarian or medical support already under way.

Article 8 – Protection of minors and vulnerable adults

The association pays heightened attention to the protection of minors and vulnerable adults supported in the course of its missions, in particular paediatric care pathways.

To this end, it ensures in particular that it:

- obtains the agreement of the minor's legal representative(s) before any decision concerning the minor, except in a clear medical emergency;
- involves the minor, to an extent appropriate to their age and maturity, in decisions that concern them;
- limits, as far as possible, unaccompanied one-to-one situations between a minor and a person falling within the scope of this policy;
- reminds any person acting for the association with minors or vulnerable adults of the applicable rules of conduct before any field mission.

Any person working with minors or vulnerable adults adopts a professional and respectful attitude, adapted to the vulnerability of the person supported.

For individual exchanges with a minor, preference is given, where possible and compatible with the situation, to a setting that ensures transparency and the protection of everyone concerned.

Article 9 – Prevention of sexual exploitation and abuse

Any person falling within the scope of this policy is strictly prohibited from soliciting, accepting or maintaining, directly or indirectly, a relationship of a sexual nature with a beneficiary, whatever the beneficiary's age and even where there is apparent consent, where that relationship relies, even indirectly, on the relationship of assistance or support.

This prohibition extends to any form of solicitation, harassment or behaviour with sexual connotations towards a beneficiary.

Article 10 – Separation between assistance and any consideration

Access to the assistance provided by the association may under no circumstances be conditional on any personal, financial, political, religious or media-related consideration. No person falling within the scope of this policy may demand or suggest such a consideration.

This prohibition also applies to any solicitation intended to obtain a personal, financial, political, religious, media-related or professional advantage in direct or indirect return for the assistance provided.

Article 11 – Proportionate use of images and testimonies

Any use of a beneficiary's image, testimony or personal data for communication purposes is subject to prior, specific consent, separate from the consent given for the support itself.

Where the beneficiary is a minor, this consent is obtained from their legal representative and, as far as possible, with the assent of the minor themselves.

The association ensures that these elements are used proportionately, with respect for people's dignity and, where relevant, the security risks specific to their situation (in particular in the case of a sensitive origin or geopolitical context). Any communication content involving a beneficiary is subject to the enhanced validation provided for by the association's communication strategy (PMH-COM-001). Consent to the use of an image or testimony may be withdrawn at any time; the association then endeavours to stop any further dissemination, within the limits of what is technically possible for content already published.

Particular attention is paid to people who are displaced, refugees, asylum seekers or likely to be exposed to an additional risk as a result of their identity being disclosed.

Images, testimonies or data disseminated must never undermine people's dignity or expose them to a risk of stigmatisation, exploitation or reprisals.

CHAPTER 3 – REPORTING AND HANDLING OF CONCERNS

Article 12 – Reporting channel accessible to beneficiaries

Any person – beneficiary, family member, volunteer, employee, partner or third party – may report, in good faith, a situation falling within the scope of this policy, through simple and accessible means:

- in writing, to the dedicated address report@humanseabridge.org;
- orally, to the Safeguarding Lead or, for beneficiaries followed in Egypt, through the association's local focal point;
- to any director or member of the Bureau, who must forward the report without delay to the Safeguarding Lead or, where the report implicates the Safeguarding Lead, under the conditions set out in Article 13.

A report may be made in the language of the person reporting. The association ensures, as far as its means allow, that a non-French-speaking beneficiary can be understood, in particular through the Arabic-speaking local focal point.

Article 13 – Role of the Safeguarding Lead

The Safeguarding Lead is the designated point of contact for receiving, directing and following up reports falling within the scope of this policy. The conditions of their appointment are set out in Article 17.

The Safeguarding Lead acts with impartiality, independence and confidentiality in the performance of their duties.

Where a report concerns the Safeguarding Lead themselves, or where the latter has a conflict of interest with regard to the reported facts, the report is addressed to the President or, if the report also implicates the President, to the Secretary General or to any director not implicated, consistent with the rule laid down in Article 63 of the internal rules for the general duty to report.

Article 14 – Handling of reports

Every report received is acknowledged, examined in good faith and, where necessary, referred to the competent authorities where the facts may constitute a criminal offence.

The handling of a report respects in particular:

- the confidentiality of the identity of the person reporting and, as far as possible, of the person concerned by the reported facts;
- the proportionality of the measures taken, including the precautionary measures necessary for the immediate protection of a person;
- the right of the person implicated to be informed of the facts alleged against them and to present their observations, under conditions compatible with the protection of the person or persons concerned.

Pending the creation of the Register of Incidents and Alerts (DOC-019), each report falling within the scope of this policy is recorded by the Safeguarding Lead in a simple log, stating at least the date, a brief description of the facts, the action taken and the closing date.

Any person who is the subject of a report is entitled to an impartial examination of the facts in which they have the right to be heard and to respond.

Article 15 – Protection against retaliation

No retaliatory measure may be taken against a person who has made, in good faith, a report falling within the scope of this policy, including where the reported facts are not confirmed at the end of their examination.

A report made in bad faith, with intent to harm, may however give rise to the measures provided for by the articles of association and the internal rules.

Article 16 – Link with the Register of Incidents and Alerts

Once created, the Register of Incidents and Alerts (DOC-019) takes over all the reports recorded under Article 14 and becomes the reference monitoring tool, under the responsibility of the designated Lead, in accordance with the Document Corpus.

CHAPTER 4 – IMPLEMENTATION AND GOVERNANCE

Article 17 – Appointment and duties of the Safeguarding Lead

The Safeguarding Lead is appointed by the Board of Directors in accordance with the internal rules and the association's Document Reference Framework.

Pending the creation of the Board of Directors, and in order to ensure the continuity of the protection of the people supported, the Executive Committee (Bureau) appoints an interim Safeguarding Lead on a transitional basis. This appointment is subject to ratification or review by the Board of Directors at its first meeting following its constitution.

The Safeguarding Lead performs their duties with complete impartiality, independence and confidentiality, and solely in the interest of protecting people. In the performance of their duties, they have the autonomy necessary to receive, examine and direct reports falling within the scope of this policy.

The Safeguarding Lead may not take part in handling a report where they are personally involved, directly or indirectly, in the reported facts, or where a conflict of interest is likely to affect their impartiality. In such a situation, the report is handled in accordance with the provisions of Article 13.

The Safeguarding Lead is responsible in particular for:

- receiving, recording and following up reports falling within the scope of this policy;
- ensuring the protection of the people concerned while reports are being handled;
- proposing, where necessary, any precautionary measure intended to prevent an immediate risk;
- keeping, or coordinating the keeping of, the register of incidents and alerts provided for by the document corpus;
- contributing to raising the awareness of directors, volunteers, employees, local focal points and partners of the principles of this policy;
- presenting, at least once a year, a summary and anonymised report to the Executive Committee and then to the Board of Directors on the implementation of this policy, the prevention actions carried out, the reports handled and recommendations for improvement.

On a transitional basis, and until the creation of the Board of Directors, the association ensures that this function is performed by a person other than the President, in order to guarantee the independence of the reporting mechanism and to prevent any conflict of interest between the operational management of the association's activities and the handling of alerts.

Article 18 – Awareness-raising and training

The association ensures that every person falling within the scope of this policy is informed, before any mission or intervention with beneficiaries, of the principles it contains and of the reporting channel available.

This awareness-raising relies in particular on the interview guide for editorial focal points (PMH-COM-004) and the volunteer preparation file (PMH-COM-005) already produced by the association, and will be supplemented by the future Volunteer Charter (DOC-004).

Additional awareness-raising is organised whenever this policy changes significantly or when new volunteers, employees or local focal points join.

Article 19 – Monitoring of the policy

The Board of Directors reviews, at least once a year, the conditions under which this policy is implemented, in particular the number and nature of reports, the awareness-raising actions carried out, any difficulties encountered and the improvements proposed. The conclusions of this review give rise, where appropriate, to an improvement plan or a revision of this policy.

Article 20 – Adoption, revision and entry into force

Pursuant to Article 47 of the internal rules and the Document Framework (§6), this policy falls within the competence of the Board of Directors.

Pending the creation of the Board of Directors, and in accordance with the principle already adopted for the Financial and Resource Allocation Policy (PMH-POL-FIN-001, Art. 42), this policy is adopted on a transitional basis by the Executive Committee. It enters into force on the date of its adoption by the Bureau and will be submitted for ratification by the Board of Directors upon its creation, in accordance with the clarification adopted for the adoption of the association's governance documents.

It is revised at least every two years, or at any time if a report handled under Chapter 3 shows that this is necessary.

The Board of Directors may decide on an early revision where changes in activities, funder requirements or regulations justify it.

APPENDIX 1 – ACCESSIBLE SUMMARY FOR BENEFICIARIES

This summary may be given or read to the people supported and their families, in plain language.

What Pont de Mer Humanitaire commits to

- We respect your dignity, your safety and your privacy.
- We always ask for your agreement before acting on your behalf, or that of your representative if you are a minor.
- No one in the association may ask you for anything in exchange for the help provided.
- We only publish a photo or testimony about you with your specific agreement, which you can withdraw at any time.

If something is wrong

- You can say so at any time, without fear of losing the association's help.
- You can write to report@humanseabridge.org, talk to the local focal point, or to any person in charge at the association.
- What you say will remain confidential and will be taken seriously.

If you do not speak French, we will try to enable you to make your report in a language you understand.

APPENDIX 2 – EXAMPLES OF SAFEGUARDING SITUATIONS

Situation	To be reported
A volunteer asks for private photos of a beneficiary	Yes
A photo is published without consent	Yes
A gift is requested in exchange for help	Yes
Humiliating behaviour towards a patient	Yes
An intimate relationship with a beneficiary	Yes
Suspected mistreatment of a child	Yes
Use of a beneficiary's medical information without authorisation	Yes
Publication of a location that could identify a vulnerable beneficiary	Yes

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