

SCI POLICY: PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE (PSEA)

Functional Area:	People and Organisation
Owner (Name + Position):	Chet Kuchinad, Chief People Officer
Approved by:	Senior Leadership Team
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Languages (Inc. hyperlinks):	English, French, Spanish, Arabic plus any other to ensure the document is fully understood
Applicable to:	All staff, Save the Children members' staff deployed/seconded to SCI, 'all third parties: partners, implementing partners, consultants, contractors, visitors and volunteers involved in the work of SCI'

SECTION I: PURPOSE

Protection from Sexual Exploitation and Abuse (PSEA) is not exclusive to adults it includes children as well. The protection from sexual exploitation and abuse of children is dealt with under our Child Safeguarding policy. This policy is specifically concerned with the **Protection from Sexual Exploitation and Abuse (PSEA) of adults. This includes direct or indirect beneficiaries of our programming and adults in the wider communities in which we work.**

For anyone under 18, refer to the Child Safeguarding Policy. For issues in relation to staff refer to the Global Anti - Harassment policy which covers sexual harassment, SEA and bullying of SCI staff.

The PSEA policy contains essential principles and rules that reflect the behaviours and standards expected from employees, trustees, volunteers, interns, trainees, consultants, partners, and

other representatives working for, or contracted on behalf of SCI in any capacity and covers our international development and humanitarian work.

SCI is aware that employees and other representatives working for or on behalf of the organisation frequently work in situations where they are in positions of power and where they are granted high levels of trust (in relation to the people we are trying to reach, vulnerable adults, vulnerable communities, as well as non-vulnerable individuals, other organisations and one another).

This power and trust must never be abused and everyone in the organisation has an obligation and responsibility to maintain the highest professional and ethical standards in their day-to-day conduct.

We recognise that our work, particularly humanitarian interventions, may exacerbate and reinforce existing gender inequalities and/or increase inequitable power structures and dynamics within the communities we are working. These inequalities may also be inter-linked with other marginalising factors, such as age, disability, ethnic identity, faith, sexuality or religious affiliations, etc. These factors can reinforce dependency and vulnerability.

Sexual exploitation and abuse commonly involves on-going threats, grooming, and an escalation of behaviour that contributes to a harmful environment of potential and actual abuse as well as isolated single incidents¹. SCI's policy therefore supports the reporting of **all** issues of concern, to enable early intervention and action. SCI recognises that under-reporting is very common and understands increases in reporting as an indication of trust in the reporting and response systems rather than as necessarily an increase in SEA.

SCI is committed to reducing the opportunities for abuse and exploitation to happen through effective prevention, ensuring that survivors are not exposed to further harm through good reporting and responses, and ensuring that survivors receive appropriate care. Effective prevention and providing safe responses requires all staff, volunteers, interns, partners and other representatives to be clear about their individual accountabilities and responsibilities. It also requires all senior staff and managers to ensure that their working environments minimise the opportunities for sexual exploitation and abuse, and to ensure that reporting and response do not expose survivors or reporters to any further harm. Sexual exploitation and abuse (SEA) is a gross breach of both standards of aid, and of the rights of those in need²³.

We are committed to ensuring safeguarding measures are embedded, accessible, and communicated clearly to staff, partners, vulnerable adults and their communities, in languages and formats they understand. SCI has a clear commitment to a policy of **Zero Tolerance of Sexual Exploitation and Abuse**, in line with the UN Secretary-General's Bulletin (ST/SGB/2003/13)⁴. The PSEA Framework applies to SCI direct programming, and implementing partners, as representatives of SCI's values and principles, and this policy is intended

¹ <https://www.chsalliance.org/what-we-do/psea/psea-handbook>

² <https://www.chsalliance.org/what-we-do/psea/psea-handbook>

³ <https://interagencystandingcommittee.org/product-categories/protection-sexual-abuse-and-exploitation>

⁴ <https://oios.un.org/resources/2015/01/ST-SGB-2003-13.pdf>

to articulate the definitions, boundaries and expectations of SCI and our representatives in relation to PSEA in the pursuit of our work.

The PSEA policy applies 24 hours a day, 7 days a week and 365 days a year. Any breach of the policy will be taken extremely seriously and responded to. Breaches of the policy may be grounds for termination of engagement with SCI.

SECTION 2: POLICY STATEMENT(S)

1	<p>This policy relates to those over 18, who are defined as adults, and are direct or indirect beneficiaries, or in the communities where SCI works.</p>
2	<p>Awareness</p> <p>All staff, volunteers, interns and representatives, and partners working in any position or capacity with SCI will be provided with copies of the relevant policies and expected to adhere to the values, standards, behaviours and procedures contained therein. Failure to comply with these standards and procedures may be gross misconduct and grounds for termination of involvement with the organisation. Behaviour that is criminal will be reported to the relevant authorities unless it poses a significant risk to survivors or there is another justifiable risk in reporting. These standards are applicable 24/7, in personal life as well as in work capacities.</p> <ul style="list-style-type: none"> • All staff, volunteers and interns will be required to undertake and be able to demonstrate they have completed the compulsory face to face PSEA awareness training within the first three months of their employment or three months following the publication of this policy for existing employees. An initial briefing to ensure they understand and have signed the policy will be done during their first week of basic induction. • For all national and international staff travelling to the field and having direct contact with beneficiaries and communities in our project areas, additional PSEA training must be completed prior to travel. This will be face to face training conducted by the PSEA focal point or through a webinar briefing. • PSEA training will reference the SCI Gender Equality Policy and the organisational mandate to address gender inequality across four pillars: programme, partner, advocate and organise. • Each supplier, partner and consultant must confirm their knowledge of and adherence to the principles of this policy as part of their contractual relationship with SCI. • Partners will be made aware from their initial contact with SCI of the required safeguarding standards to protect vulnerable adults from SEA within the specific context they will be working in.

	<ul style="list-style-type: none"> • All consultants and visitors to SCI country programmes, including but not limited to journalists, donors, supporters, members of staff and representatives, must be appropriately briefed on PSEA for the nature of their work/visit, expected behaviour and how to report, beforehand and within 48 hours of arriving in country. • Managers and supervisors are required to ensure the provision and resources to support engagement in these trainings and failure to do so may be grounds for disciplinary action. Staff, volunteers and interns are responsible for ensuring their participation and engagement in this induction training. <p>SCI takes the position that early reporting of any concern supports both prevention of further abuse and safe response. There must be increased awareness about reporting, including the importance of reporting of any and all concerns, however apparently minor.</p> <p>Our staff, volunteers, interns and all other representatives and partners must never:</p> <ul style="list-style-type: none"> - Engage in a sexual relationship with a member of a vulnerable community, unless they are part of the same community and the relationship has not arisen as part of their role with SCI; - Engage in sexually abusive or exploitative relationships with members of the communities in which we work, within the workplace or with domestic staff; - Engage in exploitative sexual relationships with beneficiaries of direct or indirect assistance (the parent or caregiver of children benefitting from SCI programming, for example) from SCI; - Engage the services of sex workers, irrespective of the local or national laws or norms regarding sex work or the laws of their home country or the location in question; - Infer, suggest, request, and/or demand any sexual favours from members of the communities in which we work, in return for anything – including protection, assistance (goods, services, resources, opportunities), or employment, nor imply the same; - Support or take part in any form of sexually exploitative or abusive activities, including the trafficking of human beings, or sexual or exploitative relationships with human beings who have been trafficked; and - Fail to report any allegations, causes for concern, or suspicions of the sexual exploitation and/or abuse of another person. <p>Reporting mechanisms, communication, multiple forms of engagement used to increase the awareness of issues and reporting to individuals and communities, highly vulnerable or exposed to abuse must be in language and media appropriate and understandable to those individuals.</p>
3	<p>Prevention</p> <p>Safer Programming means all representatives of SCI must pay attention to how we work as well as what we do, the potential impact of our presence, and the ways</p>

	<p>in which we design and implement programmes. Any poor safeguarding practice must be escalated, reported, responded to and corrected. Failure to do so may result in disciplinary action</p> <p>SCI’s commitment to Zero Tolerance of sexual exploitation and abuse means all programme design and planning must include a gender power analysis, which also looks at the roles and structure of SCI staff, volunteers, interns and partners and a safeguarding risk assessment. This analysis must also include recognition of the intersections of gender with other vulnerabilities (e.g. disability, age, and so on), and programme design and staffing must reflect these assessments in line with the organisation-wide commitment that all programmes are gender sensitive at a minimum.</p> <p>We commit to Do No Harm through ensuring all areas of SCI’s work are designed and resourced appropriately to minimise the opportunities for perpetrators to act exploitatively and to maximise the safety of those engaging with our programming and otherwise involved with SCI.</p>
4	<p>Reporting</p> <p>There are two main ways that allegations or concerns may come to the attention of an organisation;</p> <ol style="list-style-type: none"> 1) Directly by a survivor themselves, or by someone close to them, such as a family member or member of the community. A direct report of a concern or incident may also come from SCI staff or representative, staff in another organisation who have heard about it in their services, or from a staff member or volunteer who has witnessed it. 2) Indirectly through information collected from different sources and analysis, including research, focus group discussions, studies, and through the collection of reported concerns, leading to identifiable patterns of potential abuse. <p><i>Any adult safeguarding concerns must be reported through one of the official SCI reporting channels.</i> Report</p> <ul style="list-style-type: none"> • through the CO HR Director, or Regional HR Director; • through the Country Director; • through the Chief People Officer or other senior leader at the location; or • through the Whistleblowing System. <p>Any information relating to a suspicion of SEA must be treated with utmost confidentiality and not be shared with any third party other than those identified as part of the defined reporting channels.</p> <p>Country Offices must have a PSEA Focal Point at the country level and all field sites, who is responsible for driving awareness of the policy and on how to report, inviting, receiving and collating all causes for concern. When these collected pieces of information generate a picture of a site, or a programme, or a particular person, the PSEA Focal Point must escalate the matter to trigger further inquiry and/ or investigation.</p>

	<p>The PSEA Focal Point must develop relationships and networks with international, national and local organisations so that those organisations know who in SCI to report SEA concerns.</p> <p>SCI has a responsibility to report incidents of PSEA to the UK Charity Commission and to keep Members fully informed and promptly updated on any suspicion of SEA relating to any of their projects implemented by SCI or its partners. Charity Commission reports are the responsibility of the legal team at the Centre and the regional safeguarding directors.</p>
5	<p>Response</p> <p>Investigations: The investigation must be instigated by senior management in the country team, with the support and involvement of HR and the Regional HR Directors. If the causes for concern involve senior management in the country programme, support and investigation must be sought from the Regional HR Director.</p> <p>Investigations are not always contingent on direct allegations from a particular survivor, but can be triggered by there being enough causes for concern from enough different sources to feel that there is likely to be a problem. It is the organisational responsibility to actively seek further information and to investigate all issues raised.</p> <p>Investigations must be confidential, in accordance with the Data Protection Policy, and the Grievance/Disciplinary Policy, and designed to prevent gossip, rumour-spreading and destruction of reputations and relationships, where possible.</p> <p>SCI is committed to ensuring a fair process for those under investigation and confidentiality for all parties. Breach of confidentiality in investigations and /or any attempt at intimidation, victimization or retaliation towards a complainant, witnesses or any other party involved in an investigation may be treated as gross misconduct.</p> <p>SCI recognises the high risk to survivors and others in reporting, including a strong likelihood of threats and/or retaliation. As such safety planning and safety management must be the core of a survivor-centred approach to response. SCI also recognises that responses are closely watched by beneficiaries and communities, taken as indications of how safe an organisation is, which can influence further reporting and the overall trust the organisation is awarded by the community. SCI is committed to running thorough inquiries and/or investigations of any and all allegations of abuse and exploitation.</p> <p>Country offices must also have a designated Survivor Liaison-Advocate, who is responsible for case management with survivors. Survivor Liaison-Advocates provide a consistent point of information with survivors, make appropriate referrals, and support survivors to have access to support services and safety planning.</p> <p>PSEA Focal Points and Survivor Liaison-Advocates must report to and be supported by HR and SEA positions at the regional level, as well as Country Directors, to maintain</p>

organisation-wide standards, provide support, and enable investigations where allegations relate to CO management.

Both the PSEA Focal Point and the Survivor Liaison-Advocate must be trained on Sexual and Gender Based Violence (SGBV) Guiding Principles, including the survivor-centred approach and must have access to GBV Standard Operating Procedures (SOPs) which include the referral pathways to enable the survivor to access the necessary services. In recognition of best practice, survivors should be offered the choice of being supported by men or women Focal Points and Survivor Liaison-Advocates.

SCI will ensure that survivors are supported into appropriate services, including health, legal, psychosocial and economic services, where possible.

These services may be within SCI programmes, or outside if the required services are not available within SCI programmes or if there are concerns around confidentiality and/or safety.

This policy will be implemented in accordance with;

- All relevant UK laws related to protection from sexual abuse, violence and harm, and those outlining measures for reporting known or alleged cases of abuse;
- Applicable laws in the countries where SCI operates; and
- The UN Secretary General's Bulletin '*Special Measures for Protection from Sexual Exploitation and Sexual Abuse*' (ST/SBGB/2003/13).

SCI will report criminal behaviour to relevant authorities, except where doing so will create additional harm for a survivor and or others. In these instances, the reasons for not reporting must be documented, approved by the Country Director and authorised by the Chief People Officer. Where there are international protocols around the reporting of perpetrators within their home countries or abroad, SCI will report appropriately.

Those under investigation will be invited and encouraged to participate in the ongoing investigation. **In the event they decline, resign or not available for any other reason, the investigation must proceed to completion regardless. The required follow-up action and decision on the outcome of the investigation will be taken by SCI senior management at the Country, Regional and or Centre level.**

It is important to note that when a formal complaint to statutory systems has been made, that this does not preclude an internal investigation by SCI. Breaches of the Code of Conduct, Child Safeguarding Policy, Global Anti-Harassment Policy, and PSEA Policy may be gross misconduct and grounds for termination of contracts and agreements.

SCI is committed to taking all appropriate corrective actions, including disciplinary, legal or other actions, in light of any findings of sexual exploitation and abuse with respect to relevant individuals (including those who have committed acts of SEA or anyone who knew of such incidents and failed to act). **SCI will take steps following any incidents of SEA to review controls and protocols to identify and address any gaps or weaknesses.**

6	<p>Representation</p> <p>No identifying information – names, images, geographical location and so on – of survivors can be used in any communications, publicity, or fundraising materials. This includes information that may support the identification of a survivor through multiple small pieces of information. Consent to use a survivor’s words or story must not be confused with consent to use any aspect of their identity.</p>
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SECTION 3: DEFINITIONS

Word/Term	Definition
<i>PSEA</i>	Protection from Sexual Exploitation and Abuse. Terms defined separately below.
<i>Survivor</i>	A person who has experienced, or is still experiencing sexual exploitation and abuse in relation to their involvement with SCI or in any other agency organisation.
<i>Representative</i>	Those associated with SCI, but not directly employed by SCI; this includes partners, agency workers, consultants, volunteers, Trustees, donors on visits to SCI programmes, contractors, suppliers and trainees.
<i>Beneficiary of direct or indirect assistance</i>	Any person who receives any assistance (including all types of goods, services, opportunities, training) directly or indirectly (as the parent or caregiver of children involved in SCI programmes and activities) or partner NGO, regardless of the length of time of their relationship with SCI.
<i>Communities in which we work</i>	Any geography in which SCI directly or indirectly operates, providing goods, services or other kinds of assistance.
<i>Vulnerable communities</i>	Including but not limited to refugee , IDP
<i>Contextual Safeguarding</i>	The process through which assessments analyse the factors that may create an enabling environment for the perpetration of sexual exploitation and abuse, including the characteristics and relative power of the people involved, and make recommendations to reduce these opportunities and promote safety for the most vulnerable and exposed.
<i>Gender Power Analysis</i>	Gender power analysis is an assessment that takes into consideration the inequalities of gender in communities and beneficiary groups, as well as with SCI staff, volunteers and representatives, and recognises the ways in which these contribute to inequalities and vulnerability.
<i>Sexual Harassment</i>	Any unwanted and/or uninvited conduct of a sexual or sexualised nature, which has the purpose or effect of violating an individual’s dignity, or creating an intimidating, hostile, degrading, humiliating, or offensive environment for that individual. This conduct may or may not be criminal, and it may or may not be direct physical touching.
<i>Sexual Abuse</i>	The threatened or actual physical intrusion of a sexual or sexualised nature, including inappropriate touching, by force or under unequal or coercive conditions, sexual assault and rape. It may also include

	threatened or actual non-physical intrusion (unwanted and/or uninvited exposure to pornography, texts, images, and so on, the sharing of images, texts and so on, demands for sexualised photographs etc.).
<i>Grooming</i>	The cultivation of emotional relationships with those in positions of vulnerability or inequitable power, with the intention or potential of manipulating these relationships into sexualised dynamics in the future
<i>Sexual Exploitation</i>	Any actual or attempted abuse of a position of vulnerability, differential power, trust, or dependency, for sexual or sexualised purposes. This includes the offer or promise of monetary, social, political benefits as an incentive or form of coercion.
<i>Sexual Favours</i>	Any sexual or sexualised acts, in exchange for something such as money, goods, services, opportunities and so on. Also includes demands for inappropriate photographs, filming, and exposure to pornography and so on.
<i>Subject of Concern</i>	The person/s against whom a complaint has been received i.e. The person who has allegedly committed the act or failed to act in a way that protects children.
<i>Sex Worker</i>	Any person over 18 years of age who receives money, goods or services in exchange for sexual or sexualised acts, and who define those activities as income-generating, even if they do not identify as sex workers or as exploited.
<i>Consent</i>	Informed consent is an ongoing agreement which is freely given based upon a clear appreciation and understanding of the facts, implications and future consequences of an action. In order to give informed consent, the individual concerned must have all relevant facts at the time consent is given and be able to evaluate and understand the consequences of an action. They also must be aware of and have the power to exercise their right to refuse to engage in an action without justification and/or to not be coerced (i.e. being persuaded based on force, coercion or threats, either direct or implied).

SECTION 4: RELATED DOCUMENTS

1	SCI Code of Conduct
2	SCI Child Safeguarding Policy
3	UN Convention on the Rights of the Child UN Declaration of Human Rights UN Secretary-General's Bulletin on the Prevention of Sexual Exploitation and Abuse
4	SCI Anti-Harassment Policy
5	SCI Whistleblowing Policy
6	SCI Child Safeguarding in Humanitarian Procedure
7	SCI Child Safeguarding Investigation Procedure
8	SCI Incident Reporting Procedure
9	SCI Disciplinary Policy

10	SCI Safer Programming Procedure and Guidelines
15	SCI Social Media Policy
16	SCI Data Protection Policy