



## **Action on Development and Humanitarian Aid (ADHA)**

# **Prevention of Sexual Exploitation and Abuse (PSEA) Policy**

### **Purpose**

ADHA is committed to preventing all forms of sexual abuse and exploitation (SEA). This policy seeks to ensure that all participants in ADHA's programs are safe and not exposed to any threat or conduct involving sexual exploitation or abuse. We are committed to responding promptly and appropriately to any SEA allegations.

### **Applicability**

This policy applies to all employees, consultants, independent contractors, agents, and volunteers ("Workers"), and visitors ("Visitors") who work on or visit ADHA and ADHA sub recipient programs.

### **Requirements**

#### **Definitions**

Sexual exploitation is defined as an actual or attempted abuse of a position of power or trust, for sexual purpose. Exploitation can include profiting monetarily, socially, or politically from the sexual exploitation of another. Sexual abuse is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

#### **Examples of Prohibited Behaviours**

ADHA Workers and Visitors are prohibited from engaging in any form of sexual exploitation or abuse of a person participating in ADHA or ADHA sub recipient program. Never engage in sexual relationships with program beneficiaries, as these relationships are based on inherently unequal power dynamics.

#### ***Examples of sexual exploitation and abuse include, but are not limited to:***

- Sexual assault or abuse;
- Unwanted (without consent) touching of a sexual nature;
- Demanding sex in any context;
- Making sex a condition for aid or participation in a development program;
- Forcing someone to have sex;
- Forcing a person to engage in sex work or pornography.

#### **Mandatory Reporting**

Workers and Visitors are required to report suspicions or allegations of SEA, or noncompliance with this policy, within the first 24 hours by alerting the ***Ethics and Compliance Officer*** or by submitting a report according to Reporting System. Workers and Visitors should also report any historic SEA allegations from any ADHA program.

All SEA reports should include the following:

- Who committed the alleged wrongdoing?
- Do you know if anyone else was involved?
- What has happened? Describe in detail what you know or suspect of a SEA incident.
- Were there any witnesses?
- When and where did the incident take place? Providing dates and time, if possible.

## **Employee Responsibilities**

Workers must:

- Be particularly alert to suspected cases of SEA within vulnerable populations.
- Report any suspected incidents or potential signs of SEA.
- Never hesitate to report suspicions of SEA because evidence was not collected.
- Respect the dignity, wishes and rights of survivors of SEA, including their wishes on whether to report to third parties.
- Seek counsel from the ADHA ***Ethics & Compliance Officer*** with questions about whether or how to report suspected cases

## **Program Design**

ADHA workers responsible for designing, pricing, funding, and implementing programs, directly or indirectly through subrecipients, are responsible for ensuring that our agents, partners and subrecipients have PSEA policies.

## **Country Offices**

All ADHA offices are required to identify emergency or survivor support resources in their country, if possible, to use in the event that a SEA allegation is reported, and the survivor in question would like to avail themselves of those resources. The Country Director/Representative (CD/R) is responsible for identifying emergency and survivor support resources in their country, if possible, for addressing and reporting suspected SEA violations, and making staff members aware of those resources.

## **Investigations and Monitoring**

The Office of Ethics & Compliance is responsible for ensuring that allegations of SEA are investigated in accordance with this policy. Throughout the investigation, Workers and Visitors are required to cooperate with the investigation. Unless otherwise required by the Office of Ethics & Compliance or law enforcement, all information must be kept confidential regarding the suspected survivor(s) and suspected perpetrator(s).

ADHA's Ethics and Compliance Officer and their investigators are responsible for conducting investigations of internal SEA reports to the extent local authorities are not involved. The Chief Ethics and Compliance Officer must report aggregated incident data to the ADHA Senior Management Team (SMT) and to the Board of Trustees on a quarterly basis. The Ethics and Compliance Officer shall immediately report all exceptional cases to the SMT and Board of Directors as needed. The Ethics & Compliance Office also is responsible for monitoring that this policy is routinely followed.

## **Enforcement**

Sexual exploitation and/or abuse of program participants constitute acts of serious misconduct and are grounds for disciplinary action, including termination of employment and referral to law enforcement, as well as termination of subrecipient grants, if applicable. Country Offices must comply with local laws on SEA violations. A staff member who is proven to have committed sexual exploitation and/or abuse will be dismissed from their employment with ADHA and ineligible for rehire. If an allegation is made in bad faith, appropriate steps will be taken to follow up with the

person who has made the allegation and the person accused. Any Worker who makes false and malicious accusations will face disciplinary action, up to and including termination.

Approved by: Secretary General, ADHA

Name & Signature: -----

Date: