



Humanitarian and Development

Non-Governmental Organization (HDNGO)

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PSEA

Prevention of Sexual Exploitation and Abuse Policy

Humanitarian and Development Non-Governmental Organization

Executive Team
www.hdngo.org

Prevention of Sexual Exploitation and Abuse (PSEA) Policy

This policy supersedes all previous policies related to preventing and responding to sexual abuse and exploitation.

Purpose

HDNGO is committed to preventing all forms of sexual Exploitation and abuse (SEA). This policy seeks to ensure that all participants in HDNGO'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 HDNGO and HDNGO sub-recipient programs.

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 Behaviors

HDNGO Workers and Visitors are prohibited from engaging in any form of sexual exploitation or abuse of a person participating in a HDNGO or HDNGO 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 Director/Deputy Director and Compliance Officer.

All SEA reports should include the following:

- a) Who committed the alleged wrongdoing?
- b) Do you know if anyone else was involved?
- c) What has happened? Describe in detail what you know or suspect of a SEA incident.
- d) Were there any witnesses?
- e) 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 HDNGO Office of Ethics & Compliance with questions about whether or how to report suspected cases.

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 or 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).

HDNGO'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 HDNGO Board of Directors on a quarterly basis. The Chief Ethics and Compliance Officer shall immediately report all exceptional cases to the 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 sub-recipient grants, if applicable.

A staff member who is proven to have committed sexual exploitation and/or abuse will be dismissed from their employment with HDNGO 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.