

## **POLICY ON PROTECTION AGAINST SEXUAL EXPLOITATION AND ABUSE (PSEA)**

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### **PURPOSE OF THIS POLICY**

- Enforce a zero-tolerance policy on sexual exploitation and abuse (SEA) for all IMPACT staff members, partners, and consultants.
- Create and maintain a safe environment free from SEA by taking appropriate measures both internally and within the communities where IMPACT operates, through strong prevention and intervention efforts.

#### **1. Statement:**

- 1.1 SEA violates universally recognized international legal norms and standards and constitutes unacceptable behavior and prohibited conduct for all IMPACT staff, partners and consultants.
- 1.2 IMPACT has a zero-tolerance policy on SEA. All IMPACT staff, partners, and consultants must maintain and promote the highest standards of personal and professional conduct and provide assistance and services in a manner that respects and upholds the rights of beneficiaries and other vulnerable members of local communities.

#### **2. Scope:**

- 2.1 This policy defines IMPACT's approach to preventing and responding to SEA. The policy applies to all IMPACT staff, partners, and consultants, whether on duty or off duty.

#### **3. Definitions:**

- 3.1 For the purposes of this policy, "sexual exploitation" refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes. This includes but is not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.
- 3.2 Similarly, the term "sexual abuse" refers to the actual or threatened physical intrusion of a sexual nature, which may occur by force, under unequal conditions, or under coercive circumstances.

#### **4. Commitment to PSEA:**

- 4.1 IMPACT will make every effort to create and maintain a safe environment free from SEA and will take appropriate measures to this effect in the communities where it operates through a robust PSEA framework that includes prevention and response measures.
- 4.2 This PSEA framework affirms IMPACT's commitment to the UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse (ST/SGB/2003/13) and to the full and continuous implementation of the Inter-Agency Standing Committee's (IASC) six core principles on SEA.

#### **5. Six Core Principles:**

- 5.1 SEA committed by IMPACT employees and associated personnel constitute acts of gross misconduct and are, therefore, grounds for dismissal.
- 5.2 Sexual activity with children (persons under 18) is prohibited, regardless of the local age of majority or consent. A mistaken belief about the age of a child is not a valid defense or justification.
- 5.3 The exchange of money, employment, goods or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior, is prohibited. This includes the exchange of assistance due to beneficiaries.
- 5.4 Any sexual relationship between IMPACT staff or its associated personnel and beneficiaries of assistance (or other vulnerable members of the local community involving inappropriate use of rank or position) is prohibited. Such relationships compromise the credibility and integrity of humanitarian work.
- 5.5 When an IMPACT staff member or related personnel develops concerns or suspicions of sexual abuse or exploitation by a colleague, whether in the same organization or not, they should report those concerns via the established reporting mechanisms.
- 5.6 All IMPACT staff, partners, and consultants are required to create and maintain an environment that prevents SEA and promotes the implementation of this policy. Managers at all levels have specific responsibilities to support and develop systems that maintain this environment.

## **6. Organizational Management - Cooperation Agreements:**

- 6.1 IMPACT includes a standard clause in all its contracts and partnership agreements with its contractors and consultants obliging them to commit to a zero-tolerance policy on SEA and to take measures to prevent and combat SEA.
- 6.2 IMPACT requires the signing of a code of conduct that includes the PSEA in all procurement processes.
- 6.3 Failure of these entities or persons to take preventive measures against SEA, to investigate allegations, or to take corrective action in the event of SEA will constitute grounds for the termination of any cooperation agreement.

## **7. Human resources:**

- 7.1 Recruitment: the procedures below describe the steps to be followed for recruitment.
  - 7.1.1 Verification: IMPACT systematically reviews all potential candidates in accordance with established selection procedures.
  - 7.1.2 Job posting: IMPACT explicitly states its zero-tolerance policy on SEA in a standard paragraph in its job advertisements.
  - 7.1.3 Interviews: As part of recruitment interviews, IMPACT asks questions related to ethics and PSEA.
  - 7.1.4 Self-declarations: IMPACT requires selected candidates to sign a self-declaration undertaking not to have committed any SEA in the past and not to commit any in the course of their new duties within the organization.
  - 7.1.5 Employment contracts: IMPACT incorporates a PSEA clause in employment contracts, clearly establishing the definitions, roles, and responsibilities of staff regarding PSEA. These include obligations but are not limited to not committing SEA, reporting cases of SEA, and participating in good faith in any investigation or audit related to a SEA situation conducted by the organization.
- 7.2 HR Procedures: IMPACT adapts its HR procedures with its SEA policy, to describe the mechanism for reporting and responding to SEA allegations (disciplinary measures in case of proven allegations).

## **8. Internal training on PEAS:**

- 8.1 IMPACT organizes mandatory initial and refresher training, preferably in-person or online, for all employees and associated personnel, on the Organization's SEA policy and procedures. To this end:

8.2 IMPACT has PEAS training materials, whose modules include:

- A clear definition of SEA (in line with the UN definition).
- A clear ban on SEA.
- Measures to be taken by employees and staff (e.g. prompt reporting of allegations and referral of victims).

## **9. Preparation of whistleblower reports:**

9.1 IMPACT has a secure, confidential and accessible mechanism and procedures for staff, beneficiaries and communities, including children, to report allegations of SEA and to ensure that beneficiaries are aware of them. IMPACT has mechanisms in place to restrict access to information and securely store written reports to ensure the safety of the victim and complainant.

9.2 IMPACT guarantees that its reporting mechanisms respect the fundamental principles of effective reporting:

- Security
- Privacy
- Transparency
- Accessibility

9.3 Protection against Retaliation: IMPACT is committed to maintaining a culture of transparency and a safe environment where staff members and beneficiaries can report SEA allegations as soon as possible without any adverse or penalizing action being taken against them. The organization does not tolerate any kind of retaliation, or threat of retaliation, taken against anyone who reports a SEA situation or cooperates with any investigation process related to a SEA allegation. IMPACT has a secure, confidential, and accessible mechanism and procedures for staff, beneficiaries, and communities, including children, to report any consideration of retaliations taken against them.

9.4 Whistleblowing mechanism: IMPACT has an internal whistleblowing policy (see document titled: Whistleblowing Policy).

9.5 Awareness-raising: IMPACT is committed to widely disseminating all available reporting channels to staff, beneficiaries and local communities.

9.5.1 With employees:

IMPACT informs its staff and associated personnel, through mandatory notifications, both in writing (e.g. memo, detailed email) and orally (e.g. meeting, conference call, Zoom), incorporating the following content:

- A clear description of the behaviors that constitute SEA, emphasizing the need to report when in doubt about a case.
- The obligation of all staff to report any suspicions or concerns and the consequences of non-reporting (e.g. disciplinary action).
- The ability to report information anonymously.

- The organization's protection for those who make an allegation in good faith (e.g. whistleblower protection policy, complainant protection plans).
- Details of the person reporting and the information to be shared to enable an appropriate response and follow-up.
- Explanation of how the organization will use the information (e.g. who will receive reports and the internal response and follow-up procedure).

#### 9.5.2 With beneficiaries and local communities:

IMPACT organizes awareness-raising on PSEA and relevant policies and procedures in the communities where activities take place.

To this end, IMPACT has visual communication material for communities and "ready-to-use" awareness-raising messages. These materials are:

- Validated by the UNICEF PSEA focal point.
- Adapted to the local context.
- Written in relevant local languages.
- Presented so that all groups - including children - understand the content.

#### 9.5.3 Inter-organizational mechanisms: IMPACT aligns its internal reporting mechanisms with those of inter-agencies where they exist in the country.

### **10. Support and referencing:**

10.1 IMPACT is committed to ensuring that any victim of SEA can access care and support, regardless of IMPACT's decision to investigate the allegation, the findings of the investigation if conducted, and whether the victim cooperates with such investigations. IMPACT will promptly refer SEA victims to available services, according to their needs and consent. Care and support are; victim-centered, rights-based, age, disability and gender-sensitive, non-discriminatory and culturally appropriate.

Care, support and referral will follow the key principles of free and informed consent and pursue the best interests of the child. Victim support and assistance includes (but is not limited to) protection against retaliation and secondary victimization, as well as the following services:

- Security
- Medical care
- Dignity kits
- Mental health and psychosocial support
- Legal Services
- Basic material assistance

IMPACT will seek local service providers with options for child and adult victims where appropriate, including the types of services offered.

**11. Penalties incurred:**

IMPACT adopts a zero-tolerance approach to sexual exploitation and abuse; violations of this policy will result in dismissal or termination of the partnership contract.