

Safeguarding and Protection from Sexual Exploitation, Abuse & Harassment | Policy

Purpose

This policy is created to ensure that all organizational and programmatic activities of HOPE International Development Agency support the prevention of sexual exploitation¹, adult abuse², child abuse² and harassment². This policy aligns with the organization's commitment to ethical conduct and prioritizes the well-being of all stakeholders, with the primary focus of support on the complainant and secondarily focusing on the elimination of possible unintended consequences related to this policy.

Scope

This policy applies to all individuals associated with HOPE's activities, including HOPE's Canadian-based employees, all employees in HOPE's Country Offices, board members, volunteers, interns, international and local consultants, in addition to individual and corporate contractors of these entities and related personnel. This policy also includes non-HOPE entities and their employees and individuals who have entered into partnership, or agency agreements with HOPE. It underscores the collective responsibility in preventing, detecting, and responding to abuse. HOPE employees are bound to uphold this policy and to report people or incidents that they believe contravene it. HOPE leadership has a duty to ensure that allegations of abuse are investigated and that appropriate disciplinary measures are taken. HOPE also has a duty to provide appropriate assistance to any victims of abuse by our employees, volunteers or contracted third parties.

Objectives and Principles

- HOPE has zero tolerance for bullying, harassment, sexual exploitation and abuse.
- HOPE is committed to preventing abuse of any kind.
- HOPE affirms that all forms of abuse are not acceptable.
- HOPE will not tolerate abusive or exploitative acts being perpetrated by its employees, volunteers or contracted third parties associated with the delivery of our programs.

¹ Refer to page 6 for the following definitions: Abuse, Protection from abuse, Harassment, Sexual harassment, Sexual exploitation, Sexual abuse, Child/ren, Vulnerable adults, Child exploitation and abuse, Physical abuse, Emotional abuse and neglect, Child sexual abuse, and Grooming.

HOPE is signatory to the Leaders Pledge on Preventing and Addressing Sexual Misconduct, and is committed to meeting and going beyond the pledge. The Leaders' Pledge is supported by Cooperation Canada and DIGNA, the Canadian Centre of Expertise on The Prevention of Sexual Exploitation and Abuse, and is available here: https://cooperation.ca/wp-content/uploads/2021/02/Leaders_Pledge.pdf

Responsibilities

- All HOPE staff must uphold and promote the highest standards of ethical and professional conduct and abide by HOPE's related policies on this matter.
- This policy sets the minimum standards to be followed by all HOPE staff.
- HOPE staff is often in positions of power in relation to the communities in which HOPE works.
- HOPE staff has an obligation to use their power respectfully and must not abuse the power and influence they have over any person.
- All staff are responsible for adhering to this Policy and HOPE's Code of Conduct and reporting concerns in alignment with HOPE's Whistleblowing and Confidential Reporting Guidelines.

HOPE Senior Leadership / Management and Human Resource staff are responsible for:

- Ensuring all new employees receive a copy of the policy and code of conduct, prior to, or at the time of, issuing an employment agreement, with signed copies placed in the personnel file.
- Ensuring all employees receive comprehensive policy training as part of induction and annual training, including child-specific protection measures and handling sensitive information related to incidents of sexual exploitation, abuse, or child abuse.
- Regularly informing staff about measures taken to prevent and respond to abuse, emphasizing diversity, inclusion, and the importance of creating and maintaining an environment that promotes the implementation of this policy.
- Implementing robust recruitment screening measures when recruiting new staff and volunteers to prevent perpetrators from being rehired or redeployed. Refer to HOPE's Recruitment Guideline for more detailed information.
- Developing and implementing specific, regularly reviewed strategies to prevent and respond to abuse, including organizational-specific strategies for HOPE and partner organizations.
- Embedding comprehensive abuse prevention standards in codes of conduct and recurring training materials, ensuring these include

guidelines on respectful and appropriate interaction with children and the community.

- Including explicit abuse prevention clauses in partnership agreements and ensuring these agreements mandate the development of community engagement strategies.
- Establishing accessible and survivor-centered complaint mechanisms with clear support structures. This includes being technology and language accessible.
- Conducting prompt, thorough, and impartial investigations into abuse allegations with external oversight as necessary, and clearly defining circumstances under which external oversight will be engaged.
- Taking appropriate actions, including legal measures, against staff involved in abuse, ensuring survivor support, and safeguarding individuals from retaliation for reporting abuse.
- Establishing high-level oversight and information systems to continually monitor, evaluate, and enhance efforts to prevent and respond to abuse, ensuring sensitive information is shared only with enforcement authorities and designated HOPE agents, as well as submitting anonymized biannual reports to the CHS Alliances' Harmonised Data Collection and Reporting Scheme, to provide assurance on safeguarding procedures.

Program Staff are responsible for:

- Ensuring that partners/communities are aware of HOPE's Policy and how to report concerns in alignment with HOPE's Whistleblowing and Confidential Reporting Guidelines.
- Conducting pre-program risk assessments to identify and mitigate potential risks related to Safeguarding and PSEAH, including those specific to child protection and ensuring these assessments inform all aspects of program planning and execution. These risk assessments are a part of HOPE's project planning process, and are updated as additional information is received in project and partner reports. Program Staff will also utilize information and analysis available to us as a part of CHS Alliance's Harmonised Data Collection and Reporting Scheme².
- Providing clear guidance to partners on the protection against sexual exploitation and abuse and child abuse, ensuring that this guidance is regularly updated based on risk assessments and community feedback.
- Ensuring prevention of sexual exploitation and abuse and child abuse measures are implemented within their area of responsibility, including

² "Harmonized Reporting Scheme on Sexual Exploitation, Abuse, and Harassment (SEAH) – Findings from a Year of Piloting – September 2022 to October 2023", <https://d1h79zlgft2zs.cloudfront.net/uploads/2023/11/SEAH-Harmonisation-Scheme-pilot-report-1.pdf>

adherence to child-specific protection measures such as appropriate conduct when working with children and when photographing or filming children.

- Following up and addressing sexual exploitation and abuse and child abuse issues appropriately, ensuring that all actions are taken in a manner that prioritizes the safety and dignity of survivors and at-risk individuals.
- Encouraging program partners to foster partnerships with governments and communities in preventing and responding to abuse, ensuring that these partnerships are leveraged to enhance the effectiveness of HOPE's policy and its implementation on the ground.

Volunteers and donors visiting program communities in any program country are responsible for:

- In agreement with HOPE's Visitor Code of Conduct prior to overseas travel.

Policy

1. HOPE and partner organizations are to implement a comprehensive annual training program for all staff, volunteers, and relevant stakeholders.
2. Specific staff involved with overseas programs and operations are to be trained on measures to be taken to prevent and respond to sexual exploitation and abuse and child abuse.
3. HOPE and partner organizations are required to undertake risk assessments specifically related to safeguarding and sexual exploitation and abuse, as a component of all overseas programs, to identify areas of risk and document steps that are being taken to remove or reduce these risks.
4. HOPE and/or partner organizations (where relevant) are to develop a community engagement strategy that includes regular meetings, workshops, and awareness campaigns.
5. When engaging in partnerships, project agreements will incorporate this policy as an attachment.
6. HOPE staff must undertake to create and maintain an environment that promotes implementation of this policy.
7. Directors, managers, and supervisors at all levels have particular responsibilities to support and develop systems that maintain an environment that facilitates implementation of this policy and which is free of sexual exploitation and abuse and child abuse.
8. HOPE staff will treat all children with respect, not using language or behavior that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.

9. When photographing or filming a child for work-related purposes, HOPE staff will: comply with HOPE's multi-stage process of obtaining informed consent; comply with local traditions or restrictions for reproducing personal images; ensure photographs, films, or videos portray children in a dignified and respectful manner and not in a vulnerable or submissive manner; ensure children are adequately clothed and not in positions that could be seen as sexually suggestive; and ensure images are honest representations of the context and the facts. (Refer to HOPE's Photo Guide for additional information related to informed consent).
10. HOPE staff will prevent, oppose and combat all exploitation and abuse of children. Wherever possible, HOPE staff should work with another adult present when working with children.
11. HOPE employees will not exchange money, employment, goods, or services for sex, sexual favors, or any other form of humiliating, degrading, or exploitative behavior. HOPE staff may not engage the services of sex workers.
12. HOPE staff will not engage in sexual activities with program participants or members of communities in which HOPE works because there is an inherent conflict of interest and potential for abuse of power in such a relationship.
13. HOPE staff will not support or participate in any form of sexual exploitative or abusive activities, including for example, child pornography or trafficking of human beings.
14. HOPE staff must immediately report any concerns or suspicions they have regarding possible violations of this policy by HOPE staff via HOPE's reporting mechanism (HOPE's Whistleblower and Confidential Reporting Guideline).
15. Mechanisms for reporting abuse will be accessible by multiple languages and multiple technologies / channels.
16. Circumstances under which external oversight (including engaging the support of communities and governments) will be engaged will be clearly identified.
17. Support and assistance to survivors of abuse is to be provided. (Refer to HOPE's Whistleblower and Confidential Reporting Guideline)
18. Allegations of abuse are to be investigated in a timely and professional manner. (Refer to HOPE's Whistleblower and Confidential Reporting Guideline)
19. Appropriate action is to be taken swiftly, including legal action when required, against HOPE staff who commit abuse.
20. Ensure high-level oversight and information systems on abuse reports received and actions taken.
21. All reports related to Safeguarding and Protection from Sexual Exploitation, Abuse and Harassment, will be submitted on a biannual

basis to CHS Alliance's Harmonised Data Collection and Reporting Scheme. The data provided will be anonymized and will conform with the CHS Alliance's Reporting Framework:

https://d1h79zlgfht2zs.cloudfront.net/uploads/2022/09/SEAH-HRS_Final-framework.pdf

22. HOPE and partners are required to have organizational-specific strategies to prevent and respond to abuse. The flowchart for how HOPE responds to Safeguarding and PSEAH reports is attached as Annex 1.
23. Sensitive information related to incidents of sexual exploitation and abuse or child abuse shall be shared only with enforcement authorities and HOPE agents, as per HOPE's E-Safety and Digital Content Guideline.

Exceptions

- Extenuating cases where a HOPE staff member employed within a Country Office shares ethnicity or is of a similar ethnicity and is involved in a relationship with an adult community member or adult program participant due to the relationship commencing prior to the community being a program recipient, the HOPE staff member must immediately report this relationship to their supervisor prior to the community being an active participant of HOPE / partner programming, for appropriate guidance.

Compliance and Enforcement

To demonstrate that HOPE takes seriously all concerns and complaints about abuse involving HOPE staff and related personnel, HOPE initiates a rigorous investigation of a complaint that indicates a possible violation of this policy and will take appropriate disciplinary action, as warranted.

Retaliation against any person for reporting a complaint, complaining about a violation of this policy, cooperating with the investigation of a complaint or filing a complaint with an external agency is absolutely prohibited. Retaliation is considered a serious violation of this policy and is a serious concern and may result in disciplinary action, up to and including dismissal, in accordance with applicable laws.

Sexual exploitation and abuse and child abuse by HOPE staff constitute acts of gross misconduct and are therefore grounds for immediate termination of employment.

Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of the majority or age of consent locally. Mistaken belief in the age of the child is not a defense.

These standards apply to all HOPE staff and HOPE expects all staff to make decisions that reflect HOPE’s Code of Conduct and core values in their professional and personal lives. Any violation is a serious concern and may result in disciplinary action, up to and including dismissal, in accordance with applicable laws. All HOPE staff must agree to meet these standards.

Review and Revision

Policies are reviewed every 3-years or within 3-months following relevant regulatory changes and organizational changes, formalized concerns raised to either the Executive Director or Board Chair, or any instances of significant non-compliance of the policy.

Reviews are routinely conducted by any member of the Senior Leadership team, or by any Board Director following a request for review by the Board Chair.

Date of next review is: 28 Feb, 2027

References³

- Core Principles are from the UN Secretary-General’s Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13).
- HOPE’s Code of Conduct
- HOPE’s Whistleblower and Confidential Reporting Guideline
- Confidential Complaint Form: (this link needs to be updated as a hope-international.com/link... <http://www.hope-international.com/complaints>)
- CHS Alliance’s Harmonised Data Collection and Reporting Scheme
- HOPE’s Recruitment Guideline
- HOPE’s Photo Guide
- HOPE’s E-Safety and Digital Content Guideline

Definitions

Abuse:

Abuse is a selfish act of oppression and injustice, exploitation, and manipulation of power by those in a position of authority. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture. It can take a number of forms, including the following: physical abuse; sexual abuse; sexual exploitation; emotional abuse; bullying; neglect and financial (or material) abuse.

³ Laws, regulations, or other policies that support or are related to the current policy.

Protection from abuse:

Measures taken to protect all people, and particularly vulnerable women, men, and children from abuse. HOPE recognizes that power may lead to abuse. HOPE's staff, volunteers and contracted third parties have access to goods and services that put HOPE in a position of power over communities and community members where HOPE most often works. Unfortunately, a minority of people may use this imbalance of power to exploit and abuse the vulnerable members of the community. Vulnerable communities and people should expect that the organization assisting them is managing its resources effectively, efficiently, and ethically, and that they receive assistance appropriate to their needs, at the right time, and with access to information and active participation in decision-making that affects them. Survivors of abuse must therefore be protected and supported.

Harassment:

Harassment is a form of discrimination that involves any unwanted physical or verbal behavior that offends or humiliates the individual, by any person to another individual within the scope of HOPE's work. Such behavior is deemed harassment when it is known or ought reasonably to be known to be unwelcome. This encompasses a range of conduct, including but not limited to jokes, intimidation, physical threats, or obstruction that can impede work performance or create a hostile environment. In the context of employment, harassment is prohibited when it is based on one or more prohibited grounds of discrimination such as race, color, sex, sexual orientation, age, marital status, religion, disability, etc

Sexual harassment:

Any unwelcome sexual advance, comment, expressed or implied sexual demand, touch, joke, gesture, or any other communication or conduct of a sexual nature, whether verbal, written or visual, by any person to another individual within the scope of HOPE's work. The definition includes sexual harassment that is any other communication or conduct of a sexual nature, whether verbal, written or visual, by any person to another individual within HOPE's policy scope. The definition includes sexual harassment that is directed at members of the same or opposite sex and includes harassment based on sexual orientation. HOPE prohibits sexual harassment of any individuals, employee, project partner or program participant, regardless of their work relationship.

Sexual exploitation:

Sexual exploitation means any actual or attempted abuse of a position of authority, differential power, or trust, for sexual purposes, including, but not

limited to, profiting monetarily, socially or politically from the sexual exploitation of another or giving advantage (monetary, social, political) in exchange for sex.

Sexual abuse:

Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

“Sexual exploitation and abuse” throughout this policy refers to children as well as adults.

Child/ren:

A child is any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood.⁴

Vulnerable adults:

- those aged over 18 years and who identify themselves as unable to take care of themselves/protect themselves from harm or exploitation; or
- who, due to their gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.

Child exploitation and abuse (involves one or more of the following):

a) Physical abuse

Physical abuse occurs when a person purposefully injures or threatens to injure a child or young person, which may include slapping, punching, shaking, kicking, burning, shoving or grabbing. The injury may take the form of bruises, cuts, burns or fractures.

b) Emotional abuse & neglect

Emotional abuse is inappropriate verbal or symbolic acts toward a child or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability.

Neglect is the failure to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being.

c) Child sexual abuse

Child sexual abuse is the involvement of a child in sexual activity that s/he does not fully comprehend, give informed consent to, or for which s/he is not developmentally prepared and cannot give consent, or that violates the laws or

⁴ Definition of child from the Inter-Agency Standing Committee (IASC) Guidelines to implement Minimum Operating Standards for Protection from Sexual Exploitation and Abuse by UN and non-UN Personnel, March 2013.

social taboos of society. It is evidenced by an activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the other person. It may include, but is not limited to, the inducement or coercion of a child to engage in any unlawful sexual activity, the exploitative use of a child in prostitution or other lawful sexual practices or the exploitative use of pornographic performances and materials.

d) Grooming

Grooming generally refers to behavior that makes it easier for an offender to procure a child for sexual activity. It often involves the act of building the trust of children and/or their caregivers to gain access to children in order to engage in sexual activity. For example, grooming includes encouraging romantic feelings or exposing the child to sexual concepts through pornography.

Approval and Effective Date⁵

This is an administrative/operational policy which relates to Overseas operations.

Approver of this policy: Director of Overseas Programs

Name of Approver: Sean Burke

Date of Approval: 28 Feb, 2024

⁵ The Executive Director and the Director for Overseas Programs are the approvers for administrative and operational policies, including subsidiary financial policies, which relate to Canada-based and Overseas operations, respectively, with the exception of top-level⁶ financial policies. The Board of Directors can be invited to provide input on all of the above policies and is the approver for all top-level financial policies, as well as all personnel⁷ policies.

⁶ The top-level financial policies are those which set the overarching principles for organizational financial management, including Financial Governance, Investment, Capital Expenditure, and Risk Management. Subsidiary financial policies are those related to day-to-day operations, including Budgeting and Forecasting, Reimbursement, Procurement as well as Financial Controls.

⁷ Personnel policies are those governing the employer-employee relationship, including Equal Employment, Anti-Discrimination and Harassment, Code of Conduct, Conditions of Employment including Benefits and Compensation, as well as Workplace safety. These policies collectively contribute to a consistent, ethical, and legally compliant work environment.

Annex 1: Flowchart for how HOPE responds to Safeguarding and PSEAH reports

**Refer to HOPE's Whistleblowing and Confidential Reporting Guideline for more detailed steps.*

