

Policy on Protection from Sexual Exploitation and Abuse (PSEA)

i. Policy Introduction

The need for action to protect beneficiaries of humanitarian assistance from sexual exploitation and abuse (PSEA) arose from reports confirming that humanitarian workers had been responsible for acts of sexual exploitation and abuse (SEA) against beneficiaries. For the Network for Children's Rights ("Network"), beneficiaries are children under eighteen (18) years of age.

Sexual exploitation is defined as **an actual or attempted** abuse of someone's position of vulnerability, differential power or trust, to obtain sexual favours, including but not only, by offering money or other social, economic or political advantages, including trafficking and prostitution. Sexual abuse means the **actual or threatened** physical intrusion of a sexual nature, whether by **force**, or **under unequal or coercive conditions**. It includes sexual slavery, pornography, child abuse and sexual assault. PSEA policies and practices aim to end sexual exploitation and sexual abuse by workers in the humanitarian sector and ensure that allegations of SEA are responded to in a timely and appropriate manner.

The Network, through proven work in advancing and protecting the rights of children, recognizes the importance of adopting PSEA policies in organizational operations, since children are particularly vulnerable to experience sexual abuse and exploitation. Given the Network offers services to migrant, refugee and unaccompanied children, as well as children from lower socioeconomic backgrounds, an added level of protection against mistreatment is imperative and further affirms the association's committed to protecting children of all communities from sexual exploitation and abuse.

The purpose of the PSEA Framework, including the policy, procedures and resources, is to establish a clear framework and concrete procedures for preventing, reporting and resolving any

incidents of PSEA. This policy ensures that all of the Network's staff, associates, volunteers and partners are aware of their role and responsibilities in keeping children and all relevant stakeholders safe from any form of sexual exploitation or abuse. The policy offers definitions and sets clear responsibilities regarding prohibited behaviour and the associated PSEA procedures outline the reporting and investigation processes.

ii. Safeguarding Framework

The Network is committed to implementing a holistic safeguarding framework to ensure children beneficiaries are adequately protected from any mistreatment, as well as from sexual exploitation and abuse. The Network's PSEA Policy Framework will supplement existing regulatory documents of the Network, such as the Code of Conduct and the Child Safeguarding Policy. As such, the PSEA policy adds a layer of protection and ensures that all aspects of Child Protection are respected and implemented accordingly.

The objective of this policy is to provide practical guidance to the Network in responding to an allegation of SEA, including referral of the survivor to appropriate services, report SEA and investigate SEA allegations in a safe, accessible, confidential and efficient manner.

PSEA guidelines are not intended to change or override internal policies or national legislation. Rather, they are procedures that arise from and supplement internal policies of the Network.

Additionally, the Network's partners are requested to incorporate PSEA procedures/reporting mechanisms into their own individual code of conduct and operational plans.

iii. Definitions

- **Beneficiary:** A person who receives assistance as part of either emergency relief or development aid through assistance programmes. In the context of the Network for Children's Rights, beneficiaries are children and teens under 18 years of age.
- **Community-Based Complaints Mechanism (CBCM):** A CBCM is a system blending both formal and informal community structures, where individuals are able and encouraged to safely report any suggestions, complaints **or** incidents of SEA. For the Network, the CBCM includes a suggestion box in all premises of the association, as well as an online form.

- **Complainant:** A person who brings an allegation of SEA to the CBCM in accordance with established procedures. This person may be an SEA survivor or another person who is aware of or witnessing the wrongdoing. Both the survivor and the complainant, if different from the survivor, should be protected from retaliation for reporting SEA. Where there is any conflict of interest between the survivor and another interested party, the survivor's wishes must be the principal consideration in case handling, particularly when there is a risk of additional physical and/or emotional harm.
- **Emotional Abuse:** Emotional abuse occurs when behaviour is meant to criticize, embarrass, shame, blame, or manipulate another person. This behavior can have severe consequences on a person's self-worth and self-esteem.
- **Grooming:** Grooming occurs when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them. Children and young people who are groomed can be sexually abused, exploited or trafficked.
- **Sexual Abuse:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions or any sexual contact and/or activity with a child.
- **Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
- **Sexual Harassment:** Sexual Harassment occurs when sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature are made towards a person that does not welcome them.

iv. Responsibilities

The Board of Directors is responsible for ensuring the Network is a safe place for all beneficiaries. The management, programmes and endeavours of the Network must be in line with the PSEA policy.

The Director is responsible for ensuring all daily operations of the Network are smooth and promote the best interest of children. Additionally, the Director must be aware of the actions

and programs and their alignment with the PSEA policy.

Coordinators are responsible for ensuring the actions they run are safe for every child attending. They are responsible for overseeing their employees and ensuring their appropriate conduct with beneficiaries.

Any additional staff, associates, volunteers, partners and other stakeholders are responsible for adhering to the policy. Everyone has the responsibility to treat beneficiaries with respect and carry out their duties with this policy in mind. Finally, they are all required to read, sign and receive training on PSEA.

v. Core Policy Principles

i. Safeguarding

The Network is committed to protecting and serving all children irrespective of culture, ethnicity, sex and religion. Children should be able to benefit from the Network's programmes and be protected from any type of sexual exploitation and abuse. The Network will foster a safe environment that is conducive to children's safeguarding.

ii. Accountability

The Network's Board of Directors and Director bear the responsibility of implementing the policy and cultivating a culture of safety and respect. All staff, associates, volunteers, partners and other stakeholders will be held accountable for their actions if any instances of SEA are reported against them. The Network takes any such allegations seriously and will impose the necessary sanctions to those who fail to comply with the policy.

iii. Accessibility

The Network is committed to make accessible any mechanisms for the reporting of SEA incidents. It is important beneficiaries are able to access the appropriate mechanism and feel empowered to use them. Additionally, the Network serves all children, regardless of ability, hence providing access to these mechanisms to beneficiaries facing any disability is of paramount priority.

iv. Effective Communication

For the successful implementation of the PSEA policy all members of staff, associates, volunteers, partners and other stakeholders, must communicate effectively and in a simple and accessible

language, as to spread information on PSEA procedures.

v. Shared Responsibility

All members of staff, associates, volunteers, partners and other stakeholders are responsible for adhering to and respecting the PSEA operating rules and standards. The Network will facilitate knowledge flow on PSEA procedures and ensure all parties are informed about the policies implemented.

vi. Continuous Improvement

The Network is committed to learning and improving from operations and the implementation of PSEA procedures. Through feedback services can become more effective in reporting instances of PSEA and aiding survivor recover in a timely manner.

vii. Dignity and Respect

The Network respects all beneficiaries, members of staff, associates, volunteers, partners and any other stakeholders. Through mutual respect and understanding, instances of SEA will be taken with the outmost sensitivity, free of any judgement.

viii. Zero Tolerance

The Network has a zero-tolerance policy regarding any instances of sexual exploitation and abuse. Any abuse of power by members of staff, associates, volunteers, partners and other stakeholders are condemned unequivocally.

ix. Confidentiality

The Network will handle any reports of SEA with complete confidentiality, guaranteeing the best interests of children are secured and promoted. Confidentiality will extend to all complainants or whistle-blowers.

vi. Prohibited Actions

All members of staff, associates, volunteers, partners and other stakeholders are required to conduct themselves in accordance with the PSEA policy. Consequently, the following actions or attempts are strictly prohibited:

- Sexual, emotional or physical abuse (as defined above and in the safeguarding policy) is strictly prohibited.
- Sexual exploitation as defined previously is strictly prohibited.
- All members of staff, associates, volunteers, partners and other stakeholders are strictly

prohibited from forming any type of intimate relationship with a beneficiary. Even in the case the beneficiary is eighteen years of age or older, relationships remain strictly prohibited. Additionally, the age of consent in Greece is set to fifteen years old, however the Network strictly prohibits any relationship with a beneficiary.

- All members of staff, associates, volunteers and partners are strictly prohibited from grooming or coercing a beneficiary. This extends to both grooming or coercing from entering a sexual or any type of other intimate relationship.
- Any type of sexual harassment by staff, associates, volunteers, partners and other stakeholders is unequivocally prohibited. Sexual harassment can include unwelcome sexual advances or requests for sexual favours.
- Any form of physical violence, including verbal or physical instances are strictly prohibited.

vii. Policy Implementation

1. PSEA focal point

The PSEA Focal Point is a person from the Network who will act as the point of reference for PSEA related issues. The Focal Point will be responsible for training, disseminating information and collecting PSEA reports. The Focal point will be able to accept verbal reports of PSEA and hand a written report of the incident to the Network's Director. During formal hearings on PSEA incidents, the Focal Point must be always present, as a PSEA expert.

2. Staff

All members of staff and volunteers must follow the principles of the PSEA policy. Upon the hiring process, new members of staff will be required to read and sign an acknowledgment of the PSEA Policy. They will also be required to receive training on PSEA, given by the Focal Point. All members of staff are required to adhere to this policy and report any instances or suspicions of SEA to the PSEA focal point immediately.

3. New Staff

The Network takes concrete steps towards ensuring any new staff follows the appropriate procedures towards providing information regarding any criminal convictions regarding SEA incidents. The Network is committed to contacting past employers through the **Misconduct**

Disclosure Scheme, as to ensure offenders are not given new positions in humanitarian settings and access to vulnerable populations.

4. Awareness Raising

The Network is responsible for raising awareness regarding the PSEA Policy, both to members of staff, as well as beneficiaries, their parents or legal guardians. All parents or legal guardians must be informed about PSEA and the concrete steps the Network is taking to prevent, report and investigate any instances of SEA. Additionally, Coordinators of programmes or actions are responsible for providing adequate information about what PSEA is and the PSEA reporting mechanism.

5. Training

All members of staff, associates, volunteers, partners and any other relevant stakeholders are required to receive training on PSEA during the first months of employment. The training will be conducted by the PSEA and Child Safeguarding Focal Points. Additionally, special training sessions will be given to parents and legal guardians of beneficiaries, given there are adequate number of participants.

6. Reporting Mechanism

The PSEA reporting mechanism is established as the CBCM, namely the suggestion box and online form. Both options will be anonymous and as accessible as possible, by placing suggestion boxes in each facility of the Network. Additionally, child friendly forms will be provided to account for the young age of the beneficiaries. The PSEA Focal Point will be responsible for collecting these reports and given the nature of the complaint, the appropriate disciplinary actions will follow, according to the Network's Disciplinary Measures.

7. Confidentiality

The Network ensures the highest level of confidentiality when dealing with instances of SEA. It will take the following steps to ensure the identity of the survivor is protected: 1) The Reporting Mechanism will make anonymous reporting possible. 2) Once a report is filed and opened, only the necessary people will have access to the information at stake. 3) The Network will use code

names for all involved through the investigation procedure, thus protecting the anonymity of the involved.

8. Whistle-Blowing

All whistle-blowers will be treated with confidentiality, as to keep their identities protected and ensure there will not be any retaliation against them. All members of staff, volunteers and vendors will be able to make anonymous reports if they have encountered any instances of SEA by accessing the reporting mechanism.

9. Retaliation

The Network is committed to ensuring there is no retaliation for anyone reporting an instance of SEA. The Network extends this commitment to anyone investigating a report of SEA, or assisting in making the complaint.

All members of members staff, associates, volunteers, partners and other stakeholders should feel safe and secure in reporting a case of SEA. Any retaliation against persons making a complaint can jeopardize the Network's credibility and endanger integral services to children. Retaliation inhibits the survivor support process and endangers their physical and emotional health.

Any complaint of retaliation will be taken seriously and the appropriate disciplinary measures will be taken against the retaliator.

Examples of retaliation may include:

- Termination of the working relationship, demotion, disadvantageous assignments, lack of advancement opportunities, reprimands, or negative evaluations.
- Hostility between co-workers or retaliatory harassment, including intimidation, gossip, rumours, insults, or otherwise offensive conduct that would subject a person to ridicule or humiliation.
- Any action or set of actions likely to affect an employee's job performance.

Investigation and Disciplinary Measures

The Network has established rules for serious allegations regarding the investigation procedure

and disciplinary measures.

10. Support to Survivors

Supporting PSEA survivors begins immediately after the allegation, respecting and promoting the best interest of the child/ survivor. The Network will be responsible for ensuring the survivor's physical, psychological and emotional wellbeing are prioritised and respected. The Network will be responsible for referring the survivor to any legal and psychosocial services.