

PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE POLICY

1. INTRODUCTION

SAFE operates in a protracted humanitarian crisis where displacement, infrastructure damage, and restricted movement heighten SEA risks for vulnerable populations. Under the **UN Secretary-General's Bulletin ST/SGB/2003/13**, all personnel in partnership with UN entities must prevent and respond to SEA as serious misconduct, binding SAFE to the same high standard. This policy applies to every individual representing SAFE—employees, volunteers, consultants, partners, and contractors—to safeguard dignity, rights, and well-being across all programmes.

2. PRINCIPLES AND COMMITMENTS

SAFE grounds its approach in the **IASC Six Core Principles**:

1. **Zero Tolerance** – SEA constitutes gross misconduct and will result in immediate termination of employment or association.
2. **Protection of Children** – Any sexual activity with persons under 18 is strictly prohibited, irrespective of local consent laws.
3. **Prohibition of Transactional Exploitation** – Exchanging money, goods, or services for sex is forbidden.
4. **Power-Imbalance Prevention** – Staff-beneficiary relationships undermine trust and are strongly discouraged.
5. **Mandatory Reporting** – All suspicions or allegations of SEA must be reported immediately through SAFE's designated channels.
6. **Survivor-Centered Approach** – Victims receive confidential, respectful, and timely support, with their safety and dignity prioritized.

3. DEFINITIONS

- **Sexual Exploitation:** Abuse of power or trust for sexual purposes, including profiting from another's vulnerability.
- **Sexual Abuse:** Any actual or threatened physical intrusion of a sexual nature, by force or coercion.

- **Gender-Based Violence (GBV):** SEA is a form of GBV, exploiting gendered power differentials to victimize individuals.
- **Beneficiary:** Anyone receiving SAFE's assistance or services.
- **Staff:** Employees, volunteers, consultants, contractors, and affiliates representing SAFE.

4. CODE OF CONDUCT TO PREVENT SEA

All SAFE representatives must:

- **Respect and Safeguard** – Never exploit or abuse vulnerable individuals, including women, men, children, and persons with disabilities.
- **No Sexual Contact with Minors** – Absolutely no sexual interaction with anyone under 18 years of age.
- **No Transactional Sex** – Refrain from exchanging assistance, jobs, or benefits for sexual acts.
- **Maintain Professional Boundaries** – Avoid any relationship that could exploit power imbalances.
- **Confidentiality** – Protect all SEA information; share only with authorised PSEA personnel.
- **Immediate Reporting** – Promptly escalate any SEA concerns via SAFE's complaint mechanism. Failure to comply will result in disciplinary action, up to and including termination and legal referral.

5. RESPONSIBILITIES

5.1. Board of Directors

Endorse this policy annually, allocate $\geq 1\%$ of the budget for PSEA initiatives, and review the annual PSEA report.

5.2. PSEA Focal Point

Oversees training, complaint mechanisms, confidential case management, coordination of investigations, and victim assistance services.

5.3. Supervisors & Managers

Foster a culture that discourages SEA, support survivors, ensure accessibility of complaint channels, and monitor team compliance.

5.4. All Staff & Partners

Complete mandatory PSEA training, adhere to the code of conduct, and report any suspicions without fear of retaliation.

6. PREVENTION STRATEGIES

SAFE integrates PSEA throughout the programme cycle:

- **Policy Integration** – Embed SEA clauses in contracts, SOPs, and partner agreements to ensure clarity of expectations.
- **Contextualised Training** – Deliver annual, scenario-based sessions reflecting Gaza’s specific risks (e.g., checkpoint abuse).
- **Rigorous Recruitment** – Conduct background checks and reference verifications to exclude individuals with SEA histories.
- **Community Engagement** – Inform communities of their rights, expected staff behaviour, and how to report via posters, radio broadcasts, and community meetings.

7. COMPLAINT MECHANISM

To overcome Gaza’s connectivity and mobility constraints, SAFE offers multiple reporting channels:

- **In-Person:** Secure suggestion boxes at all SAFE offices and field sites.
- **Hotline/WhatsApp:** Toll-free numbers monitored 24/7.
- **Email & Online Form:** Encrypted, mobile-friendly platforms.
- **Community Focal Points:** Trained representatives in local DPOs and women’s centres. All reports receive a **unique case ID** and are **acknowledged within 3 working days**, with updates provided throughout the investigation.

8. INVESTIGATION AND DISCIPLINARY ACTIONS

An **Independent Investigation Team** applies the CHS Alliance Investigator Toolkit to ensure impartiality:

1. **Triage & Classification** – Level 1 (minor), Level 2 (serious), Level 3 (critical) based on harm and risk.

2. **Evidence Gathering** – Confidential interviews, document reviews, and site visits, following best-practice guides.
3. **Report & Remediation** – Formal findings with root-cause analysis and corrective actions communicated to leadership and the complainant.
4. **Disciplinary Measures** – Immediate termination and legal referral for confirmed SEA; supervisors face sanctions for failure to prevent or report SEA.
5. **Appeals** – Complainants may appeal to the Board or external bodies (e.g., Ministry of Social Development, donor OIGs) within 7 working days.

9. VICTIM ASSISTANCE

SAFE provides a survivor-centered package:

- **Medical Support:** Emergency and follow-up healthcare.
- **Psychosocial Services:** Trauma counseling, peer support groups.
- **Legal Aid:** Referral to pro-bono legal services and support navigating judicial processes.
- **Safety Planning:** Temporary shelter and secure transport arrangements.

10. WHISTLEBLOWER PROTECTION

SAFE enshrines a **non-retaliation** pledge: any adverse action against a good-faith reporter triggers disciplinary measures against the offender.

11. MONITORING, REPORTING & CONTINUOUS LEARNING

- **KPIs:** Number of reports, resolution time, training completion, survivor satisfaction.
- **Quarterly Reviews:** PSEA Focal Point analyses trends, identifies systemic gaps, and reports to the Board.
- **Annual PSEA Report:** Highlights achievements, lessons learned, and planned improvements, shared internally.