



## Protection from Sexual Exploitation and Abuse (PSEA)

### I. RATIONALE FOR POLICY

Children Believe is mindful about the protection of adults (individuals over 18 years of age) from any kind of sexual exploitation or abuse. With the introduction of this Protection from Sexual Exploitation and Abuse (PSEA) policy and its accompanying PSEA procedure, Children Believe aims to prevent and respond to any actions and omissions, whether deliberate or inadvertent, among its practices, policies or processes that would expose anyone to the risk of any kind of harm including abuse, neglect or exploitation.

In line with our commitment to a life of dignity to every individual, we intend to protect and respond to our own staff, volunteers, and the communities we serve from any sexual abuse, exploitation or gender-based violence. We recognize the importance of our duty of care to the people we are associated with while being cognizant of the inherent power imbalances in our operating space. We aim to create safe and respectful workplaces and programs that promote gender equality and are free from gender-based violence, including by addressing and responding to all abuses of power, holding people to account, and protecting the vulnerable.

### II. POLICY OBJECTIVE

The overarching purpose of the **Protection from Sexual Exploitation and Abuse (PSEA)** policy is to prevent sexual exploitation and abuse through preventive measures, raising awareness, and ensuring safe, confidential reporting mechanisms. It promotes a zero-tolerance approach, provides clear and effective responses to incidents with a survivor-centered focus, and holds individuals accountable for misconduct. Additionally, the policy fosters collaboration with partners and communities to uphold these standards, protect vulnerable populations, and arrange for necessary support to victims and survivors.

### III. POLICY SCOPE

Children Believe is committed to safeguarding the interests, rights and well-being of all people with whom it is associated and to conduct its programs and operations in a manner that is equally safe for children, youth and adults. We will address concerns about possible exploitation or abuse in an appropriate, timely manner.

This policy is applicable equally to all persons working for Children Believe including but not limited to employees, volunteers, Board members, interns, and consultants ("Representatives"); partner organizations and their representatives who are responsible for implementing programs or projects on behalf of Children Believe ("Partners"); and vendors, suppliers and third-party service providers ("Third-Party Service Providers") who interact with Children Believe Representatives and Partners (see 3.0 Definitions).

This policy is a 24 X 7 X 365 policy, meaning it applies during or outside of working hours every day of the year. This policy covers all those named above as well as direct or indirect beneficiaries in our program areas in the wider communities in which Children Believe operates.

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**IV. POLICY DETAILS**

**1. Adherence:**

- a) Children Believe Representatives commit to the highest standards of conduct when interacting with any person. Representatives are governed by the provisions of Children Believe's Code of Conduct, which they review and sign when joining the organization and to which they remain accountable for non-negotiable compliance.
- b) All Children Believe Representatives are duly required to sign a statement that they have read and understand the PSEA policy and the accompanying PSEA procedure, and agree to adhere to the provisions in their corporate and personal space alike.
- c) All Memoranda of Understanding (MOUs), contracts, Terms of Service (ToS), or other forms of agreements ("Agreements") with Partners and Third-Party Service Providers will clearly outline their PSEA responsibilities and that they will be held accountable for any deviation from the provisions. (See 6. Expected Commitment from Partners & Third-Party Providers, below, and the PSEA procedure for additional detail)

**2. Policy Violations:**

- a) Children Believe's Representatives, Partners and Third-Party Providers must not engage in any of the following non-negotiable behaviours towards any adult or child: physical, emotional, or sexual abuse or assault; neglect; sexual exploitation; exploitation in exchange of money; or child labour.
- b) Any involvement in such activity with any individual, whether Children Believe staff or non-staff, constitutes a gross violation of this PSEA policy and will be reported. All Children Believe Representatives, Partners and Third-Party Providers must comply with the PSEA policy to prevent and respond to all kinds of sexual abuse or exploitation concerns.

**3. Minimum Standards:**

- a) Children Believe follows a zero-tolerance approach for any policy violations around sexual exploitation or abuse. Children Believe will take the strictest actions in response to any violation of this policy, including termination of employment and any other appropriate legal action within the parameters of the applicable local laws. Our zero-tolerance approach implies that none of our Partners or Third-Party Providers can engage in any form of sexual abuse or exploitation against any adult or child associated with its work. We believe that every person has the identical right to protection irrespective of any individual characteristic pertaining to their age, gender, ability, culture, racial origin, religious belief, or sexual identity.
- b) Children Believe's PSEA policy and procedure will be the minimum standards that need to be followed even in countries where Children Believe's PSEA policy and procedure are more stringent than local laws or legislation.

**4. Legal Compliance**

- a) Sexual exploitation and abuse are cruel violations of fundamental human rights. In most of Children Believe's operating countries, they are punishable offenses under criminal laws with harsh punishment. Our HR policy also lists these acts as grave misconduct warranting strict disciplinary actions including termination from service/contract.
- b) Children Believe is committed to act ethically and with utmost integrity in all business dealings, and to enforcing effective systems and controls to prevent any abuse or exploitation of any individual in any of our communities or in any of our partnerships. We reiterate our commitment to maintain process transparency in our own business operations and in our approach to prevent and respond to any safeguarding violations against any individual throughout our supply chains and relationships with third parties.
- c) In addition, we are committed to ensuring our approach is consistent with our disclosure obligations and shall comply with all applicable laws, statutes, regulations and codes from time to time in force, including:
  - All relevant in-country laws related to protection from sexual abuse, violence and harm, and those outlining measures for reporting known or alleged cases of abuse;

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- Applicable laws in the countries where Children Believe operates; and
- In case the guidance in this policy conflicts with any in-country prevalent laws or regulations, the higher standard set of provisions must be observed at all times.

## 5. Preparedness and Approach:

- a) The accompanying PSEA procedure details the methods by which Children Believe endeavours to prevent occurrence of sexual exploitation and abuse of any individual. In summary, they include:
  - Awareness training for all Children Believe representatives;
  - Preventive controls, which include relevant vetting and background checks of staff as part of hiring process;
  - Reporting mechanisms, which are communicated and socialized to all Children Believe representatives; and
  - A holistic approach, ensuring a proactive, adequate, survivor-centric, and comprehensive response.
- b) In all aspects of PSEA policy, Children Believe will take a survivor-centric approach. The survivor should be assisted and supported by all those concerned or involved in referring a complaint, ensuring the survivor's confidentiality, dignity and informed consent is maintained throughout.

## 6. Expected Commitment from Partners and Third-Party Providers

Children Believe expects that all Partners and Third-Party Providers working with or for Children Believe will strive to demonstrate high standards of moral discipline, behaviour, and conduct, including taking measures to prohibit their staff and representatives from engaging in any sexual exploitation or abuse in their corporate and/or personal lives.

It is Children Believe's policy not to contract, work or align with any Partner or Third-Party Provider unless they demonstrate their commitment to meeting the following standards:

- a) **Abiding by the Children Believe PSEA policy and, in some cases, establishing their own PSEA policy:** All Partners / Third-Party Providers must have a zero-tolerance approach on sexual exploitation and abuse and take all measures as possible and applicable to prevent and respond to any actual, attempted, or threat of sexual exploitation or abuse involving Children Believe Representatives or the Partner's/Third-Party Provider's staff and representatives which arises during performance of the terms of their agreement with Children Believe. Where a Partner/Third-Party Provider establishes their own PSEA policy, Children Believe's PSEA policy and procedure will be the minimum standards that need to be followed even in countries where Children Believe's PSEA policy and procedure are more stringent than local laws or legislation.
- b) **Orientation & Training:** All Partners and Third-Party Providers will ensure that their staff and representatives are fully aware of the PSEA policy and procedures. All staff and representatives will be oriented and trained on procedures for reporting and will be required to report incidents of suspected concerns or incidents of sexual exploitation or abuse involving any staff or representative of the Partner or Third-Party Service Provider, or of a Children Believe Representative, during the terms of the Partner's or Third-Party Service Provider's agreement with Children Believe.
- c) **Reporting Obligation:** Reporting concerns or incidents is not a choice; it is an obligation. Any potential, suspected, or actual incident of sexual exploitation or abuse occurring in Children Believe's operating areas by any staff or representative of a Partner, a Third-Party Service Provider, or of Children Believe during the course of our agreement will be reported per Reporting Channel (below) within 24 hours of the occurrence. Failure to report within 24 hours will be viewed seriously and may result in termination of any agreement with Children Believe.
- d) **Reporting Channel:** Suspicions or knowledge of any potential violation of PSEA policy will be reported to a designated contact at Children Believe (which includes the PSEA focal point, Country Director / Director at Children Believe).
- e) **Confidentiality Commitment:** It is imperative that all allegations, complaints, information about, and identities of survivors and perpetrators are handled with utmost sensitivity and needed confidentiality. All information must stay confidential between the complainant/whistle-blower and the person to whom it is reported. The Partner/Third-Party Provider and its representatives must

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keep all information about any suspected or reported incidents of sexual exploitation or abuse and investigations strictly confidential, in accordance with applicable laws.

- f) **Implied Cooperation:** All Partners/Third-Party Providers will cooperate with Children Believe in the conduct of any investigations of concerns reported under the PSEA policy, and will ensure that Children Believe is updated promptly on any concerns reported including but not limited to actions taken by the Partner/Third-Party Provider in response.

## 7. Responsibilities

- a) All Children Believe Representatives are responsible to implement this policy. All Children Believe Representatives are expected to remain alert and responsive to any PSEA risks; acquire relevant knowledge and skills, which will enable them to promote strong safeguarding practices; understand the PSEA policy and procedure and other relevant safeguarding policy and procedures; and conduct themselves in a manner consistent with the prevalent policies.
- b) All Children Believe Representatives have an obligation to report violations of the PSEA policy in a timely manner, including that someone has been abused/exploited/assaulted or is at risk of any such harm, according to the reporting requirements pertaining to this policy. (To be read in conjunction with the PSEA procedure and the established procedure for reporting child safeguarding violations). All Representatives must cooperate fully and confidentially in any investigation of concerns or allegations.
- c) Children Believe Country Directors and Directors are accountable for the implementation of Children Believe's PSEA policy and procedure, including decisions on how best to apply the policy in the local context.
- d) The Executive Leadership Team and Board of Directors have ultimate responsibility for ensuring the safety of children and adults in the areas in which we work.

## 8. Exceptions

None

## V. POLICY AUTHORITY AND OFFICERS

- a. Authority to approve this policy: Board of Directors
- b. Executive champion of this policy: Chief International Programs Officer and Chief People & Culture Officer
- c. Authority to develop procedures: Country Directors
- d. Authority to approve procedures: Chief International Programs Officer

## VI. IMPLEMENTATION, MONITORING, COMPLIANCE AND REPORTING

The Executive Champion is responsible the implementation of this policy including its publication, communication, training and change management, development and implementation of the related policy procedures, forms and guidelines as well as cascading the policy to Country Offices (where applicable).

The Approval Authority identified in Section Va is ultimately responsible for compliance with this policy. The Executive Champion will report on compliance with this policy to the policy Approval Authority on a regular basis.

## VII. POLICY REVIEW

This policy and related procedures must undergo an in-depth review every **2 years**, but may be reviewed at any time as needed.

The Executive Champion will initiate and lead the policy or procedure review process and will provide updates to the Approval Authority on the progress and key dates.

## VIII. RELATED DOCUMENTS

The following internal and external documents support the application of this policy:

a. Internal Documents:

- Children Believe Standard Operating Procedure Manual for Child Sponsorship
- Children Believe Employee Handbook
- Children Believe Letter of Agreement/MOU
- Whistle-Blower Policy
- Code of Conduct
- Child Safeguarding Policy
- Child Safeguarding Procedure
- PSEA Procedure

b. External Documents:

- PSEA Tool Kit by UNICEF
- In-country laws
- Inter-Agency Task Force on the Prevention of Sexual Exploitation of Displaced Children
- United National Convention on the Rights of the Child
- CPWG Minimum Standards for Child Protection in Humanitarian Action (2012)

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## DEFINITIONS

**Executive Leadership Team (ELT):** The most senior level of staff leadership within Children Believe comprised of the Chief Executive Officer (CEO), Chief Financial Officer (CFO), Chief Marketing and Development Officer (CMDO), Chief International Programs Officer (CIPO) and Chief People & Culture Officer (CPCO). The CEO may alter the composition of the ELT as required from time to time. One person may hold more than one position. Titles may change at the discretion of the ELT or the Board.

**Executive Champion:** A member of the ELT with overall responsibility for an assigned policy including: drafting, carrying out appropriate consultations / assessment, evaluating implications of the policy including risks and costs and seeking legal advice where necessary, developing and carrying out the communication, change management and implementation plan, writing any related procedures, standards or guidelines, monitoring compliance through regular reviews of the policy as well providing oversight to cascading the policy to Country Offices. The Executive Champion may designate a delegate, who must be named.

**Sexual Exploitation and Abuse (18+ years):** Includes all forms of inappropriate conduct of a sexual nature, including but not limited to:

- Exchange of money, sex for work, goods or services for sex, including sexual favours or other forms of humiliating, degrading, or exploitative behaviour
- Sexual activity with commercial sex workers whether or not prostitution is legal in the country
- Use of a child or adult to procure sex for others.

**Sexual Abuse:** Potential or actual physical or digital invasion of a sexual or sexualized nature, including inappropriate touching, by force or under unequal or coercive conditions, voyeurism and exhibitionism, sexual assault, and rape. It may also include threatened or actual non-physical and online intrusion (unsolicited and/or uninvited exposure to pornography, texts, images and so on, the sharing of images, texts and so on, demands for nude/sexualized photographs, etc.).

**Sexual Exploitation:** A form of sexual abuse that involves a woman or man being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs. Sexual exploitation includes the exchange of sex for benefits from Children Believe

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programming. This includes any actual or attempted physical or digital abuse of a position of vulnerability, differential power, trust, or dependency, for sexual intent and purposes. This includes the offer or promise of monetary, social, or any other benefits as an incentive or form of coercion.

**Sexual Favours:** Any sexual or sexually attributed acts, in exchange for something such as money, goods, services, opportunities, and so on. This also takes account of demands for inappropriate photographs, filming, and exposure to pornography or similar acts. This includes non-contact and online sexual favours.

**Sexual Harassment:** Any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another. Such conduct will also be considered sexual harassment when it interferes with work, is made a condition of employment, or creates an intimidating, hostile, or offensive work environment. While typically involving a pattern of behaviour, it can take the form of a single incident. Sexual harassment may occur between persons of the opposite or same sex. Both males and females can be the victims or the offenders.

**Grooming:** Wilful cultivation of emotional relationships with those in positions of vulnerability or inequitable power, with vested intention of manipulating the relationships for sexual advantages at a later stage. Trapping unsuspecting people in some kind of relationship with the intention of establishing a sexual relationship.

**Gender-Based Violence (GBV):** An overarching term for violence directed toward or disproportionately affecting someone because of their actual or perceived gender identity. Sexual exploitation and abuse is a form of GBV.

**Child Sexual Abuse:** When another child, adolescent, or adult, for his or her own sexual stimulation or gratification, uses a child. Sexual abuse involves contact and non-contact activities which encompass all forms of sexual activity involving children, including exposing a child to online child sexual exploitation material or taking sexually exploitative images of children.

**PSEA Focal Point:** A designated senior staff member within each office responsible to deal with matters connected with PSEA policy, awareness, training, prevention, and response mechanisms, and to ensure support to survivors. The PSEA focal point designation is a role or "hat" and not necessarily a position. Upon being designated as a PSEA focal point, the person shall undergo specific training on PSEA as soon as is feasible.

**Children Believe Representatives ("Representatives"):** All staff members associated with or working on behalf of Children Believe anywhere in the world. Includes but is not limited to employees, Board members, volunteers, consultants, day labourers, seconded workers, and interns. Includes the executive leadership team (ELT) including but not limited to those with titles of "Director," "Manager," "Chief," "Vice-President," "President/CEO," etc.

**Partner Organizations ("Partners"):** All non-Children Believe entities and their staff and representatives who have entered into any partnership, grant, sub-grant, or sub-recipient agreement with Children Believe and who are responsible and accountable for implementation of the intended program or for carrying out any project activity. Includes but is not limited to civil society organizations; community-based organizations; local, regional, national and international NGOs; other aid agencies; and government institutions, agencies and organizations.

**Vendors/Suppliers/Service Providers ("Third-Party Providers"):** All those who have direct contact with any individual, child or adult, who is covered by the PSEA policy. Includes but is not limited to current and future vendors, independent or corporate consultants or contractors, service providers, suppliers, sub-contractors, sub-recipients, and institutional donors.

**Supporters:** Includes sponsors, individual donors, visitors, or guests such as members of the media.

**Beneficiaries:** Any individual, group or organization that directly or indirectly benefits from an

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intervention, project or program.

**Child:** A person under the age of 18 regardless of the age of majority or age of consent locally.

**Informed Consent:** The voluntary agreement of an individual who has the capacity to give consent, and who exercises free and informed choice.

**Complainant:** The person who initially notifies Children Believe or its Partner about an actual or potential sexual exploitation and abuse allegation.

**Survivor:** A person who is being, or has been, sexually exploited or abused.

**Suspicion of Misconduct:** A concern that has been raised through any of the reporting pathways. This suspicion is assessed at an initial case conference/stakeholder panel.

**Allegation of Misconduct:** If, at the case conference / stakeholder panel stage, there is a decision to investigate the suspicion of misconduct then it is treated as an allegation of misconduct.

**Outcome of Investigation:** Once an allegation is investigated and the investigation report is reviewed, the resulting recommendations are referred to as the outcome of investigation.

**Whistle-blower:** Any staff of Children Believe or of a partner organization reporting sexual exploitation or abuse will be treated in accordance with the whistle-blower policy.

**Zero Tolerance:** Children Believe has zero tolerance for all forms of abuse and coercion, including sexual exploitation and abuse, harassment, intimidation, extortion, and bullying. This implies that every single concern is fully investigated and responded to with prompt and appropriate actions, including disciplinary action proportionate to the gravity of the charges proved. We reaffirm that we hold our people accountable against the laid-down standards and ensure that the same processes are equally applicable to everyone regardless of their position or reputation within the organization.

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Approved March 2025