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Version 04	State Effective	Effective Date 18-APR-2022	Document ID 387836

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POL 01032 Protecting Program Participants from Sexual Exploitation and Abuse

PURPOSE:


To set out FHI 360's behavioral expectations and guiding principles with respect to preventing and responding to sexual exploitation and abuse (SEA) of Program Participants participating in our programs, research projects, and organizational functions.

SCOPE:

This policy applies to all FHI 360 Personnel worldwide, and to Suppliers and Supplier Personnel to the extent set out below.

DEFINITIONS:

- Child*** A person under 18 years of age irrespective of age of majority in the local context.
- Community-Based Complaints Mechanism (CBCM)*** A mechanism by which Program Participants in communities where development or humanitarian programs are being implemented are able and encouraged to safely report grievances – including sexual exploitation and abuse (SEA) incidents – and those reports are then routed to the appropriate reporting mechanisms/channels for follow-up. A CBCM usually blends both formal and informal community structures, is built on engagement with and input from Program Participants and can be set up to support multiple organizations (inter-agency CBCM) or to support a single organization or project (intra-agency CBCM) in a given a location.
- Complainant*** A person or party who makes a complaint.
- Consensual*** Involving or based on consent.
- Consent*** Agreement to sexual acts, freely given without any element of force, fraud, deceit, or coercion - whether physical, emotional, economic, or social in nature. The two necessary components of consent are that it be both *informed* and *voluntary*, meaning involved persons fully understand the sexual act to which the agreement of “yes” is made without any use of influence, force, or coercion. Children, anyone under 18 years of age, can never give consent to a sexual relationship with an adult.
- FHI 360 Personnel*** FHI 360 employees, officers, members of the Board of Directors, interns, and fellows (paid or unpaid), volunteers, agents, and other individuals authorized to act on behalf of FHI 360.
- Program Participant*** Any adult or child who is served by FHI 360 programs, or has contact with FHI 360 Personnel, Suppliers, or Supplier Personnel in connection with or as a result of FHI 360's programs or business activities.
- PSEA*** Preventing sexual exploitation and abuse (see below – sexual abuse and sexual exploitation).

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- 9. *Respondent* A person or party against whom a complaint is made.
- 10. *Sexual abuse* Any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- 11. *Sexual exploitation* Any actual or attempted abuse of Program Participants that takes advantage of their position of vulnerability or trust for sexual purposes.
- 12. *SEA* Sexual exploitation and abuse (see above - sexual abuse; sexual exploitation).
- 13. *Supervisor* An employee of FHI 360 who is in a direct supervisory role over the work of one or more employees of FHI 360.
- 14. *Supplier* Any FHI 360 contractor, consultant, vendor, service provider, subcontractor, or subrecipient.
- 15. *Supplier Personnel* A Supplier's employees, consultants, interns, and fellows (paid or unpaid), volunteers, agents, and other individuals authorized to act on Supplier's behalf.

POLICY:

1. General Policy Statements

- 1.1. FHI 360 does not tolerate any form of sexual exploitation or abuse of any Program Participant.
- 1.2. FHI 360 is committed to upholding the United Nations Secretary General's Bulletin on Special Measures for protection from sexual exploitation and abuse (ST/SGB/2003/13) and the six Core Principles of the UN Inter-Agency Standing Committee (IASC) on PSEA (2019).
 - 1.2.1 Sexual exploitation and abuse of Program Participants by humanitarian and development workers constitute acts of serious misconduct and are therefore grounds for termination of employment and potential referral to law enforcement authorities.
 - 1.2.2 Sexual activity with children (persons under the age of 18) is always prohibited, even if they are not Program Participants, regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defense.
 - 1.2.3 FHI 360 Personnel are prohibited from exchanging money, employment, goods, or services for sex acts, including sexual favors or any form of humiliating, degrading, abusive, or exploitative behavior with Program Participants. This includes any exchange of assistance that is due to a Program Participant.
 - 1.2.4 Any sexual activity between FHI 360 Personnel and Program Participants is prohibited since these interactions are subject to inherently unequal power

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dynamics. Such interactions undermine the credibility and integrity of humanitarian and development aid work.¹

- 1.2.5 Where FHI 360 Personnel develop concerns or suspicions related to SEA against Program Participants committed by a fellow worker, including colleagues at other organizations, they must report these concerns via FHI 360’s established reporting mechanisms outlined in Section 3.
 - 1.2.5.1 FHI 360 will take preventive measures, investigate SEA complaints, and take appropriate action to stop any SEA that may occur against any Program Participant, and will do so in a manner that is sensitive to the unique needs of children and adolescents.
- 1.2.6 FHI 360 Personnel are obligated to create and maintain an environment which prevents SEA and promotes the implementation of FHI 360’s Code of Ethics and Conduct. FHI 360 Personnel at all levels are responsible for supporting and developing systems which maintain this environment.

2. Conduct Constituting Sexual Exploitation and Abuse

- 2.1. Sexual exploitation and abuse can occur during in-person, virtual, or electronic interactions. Examples of sexual exploitation and abuse of a Program Participant include, but are not limited to:
 - 2.1.1 Touching, kissing, or bodily contact in a sexual way by force or by coercion
 - 2.1.2 Taking photographs that are sexual in nature (including degrading or nude photographs)
 - 2.1.3 Showing pornographic material to or asking adult or child Program Participants to engage in conduct of a sexual nature via electronic or mobile interactions (e.g., texting, email, video chat)
 - 2.1.4 Physical assault of a sexual nature, including oral sex or attempted or completed rape defined as penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim
 - 2.1.5 Offering preferential treatment or promises of preferential treatment, employment, services, or goods to a Program Participant for submitting to sexual conduct, including soliciting or attempting to solicit any Program Participant to engage in sexual activity for compensation or reward, or promise of a relationship or marriage
 - 2.1.6 Threats or demands that a person submit to sexual requests as a condition of continued program participation or to avoid loss of program-related benefits


¹ Since FHI 360 implements a wide range of programming, including projects that focus solely on capacity-development or technical assistance (TA) to counterpart organizations (e.g., Ministry of Health, community-based organizations) and because FHI 360 has a broad definition of “program participant,” a program participant could include a professional peer or staff from a counterpart organization to which FHI 360 is providing TA. In these situations, consensual sexual activity between FHI 360 Personnel and adult personnel from counterpart organizations is not prohibited as long there is no misuse of power, rank, or position by FHI 360 personnel, as well as any form of abuse or other misconduct towards *any* type of program participant. In all cases, FHI 360 personnel are responsible for behaving according to FHI 360’s “Code of Ethics and Conduct.”

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- 2.2. Even in instances when sexual contact was initiated by a Program Participant, FHI 360 Personnel are bound by all the provisions of this policy.
 - 2.3. The list of prohibited actions set out above is not intended to be exhaustive. Other types of sexually exploitive or sexually abusive behavior - and other forms of humiliating, degrading, or exploitative behavior induced by force, fraud, or coercion - may be grounds for administrative and disciplinary action. See sections 8 and 10.
3. FHI 360's Standard Reporting Mechanisms
- 3.1. FHI 360 Personnel who observe, suspect, or become aware of SEA or any other conduct prohibited by this policy, are required to report the conduct promptly, ideally within 24 hours or as soon as possible under the circumstances, either orally or in writing, using **one** of the reporting mechanisms in section 3.3 below. Reports can be made anonymously, but they are generally more difficult to investigate due to limited information. FHI 360 Personnel are urged to provide as much detailed information as possible about the conduct, including, if possible, identifying people who were involved or who witnessed the conduct, so long as this will not put the persons identified at risk of immediate harm.
 - 3.2. FHI 360 Supervisors, local Human Resources (HR) representatives, and regional or department HR partners who receive reports of actual or suspected SEA or other violations of this policy from other FHI 360 Personnel are required to promptly forward the report to the Office of Compliance and Internal Audit (OCIA) or Headquarters HR via the appropriate reporting mechanism in Section 3.3 below. HR staff and Supervisors are strictly prohibited from investigating such reports or taking any action on their own.
 - 3.3. Reports of policy violations can be made to:
 - 3.3.1. An individual's immediate supervisor, or, if the conduct involves the immediate supervisor, any other supervisor within their department
 - 3.3.2. FHI 360 local HR representative or regional or departmental HR Partner
 - 3.3.3. FHI 360 Director of HR Partnering or Chief Human Resources Officer ([see HR's FHI 360 Connect site for contact information](#))
 - 3.3.4. FHI 360 Office of Compliance and Internal Audit (OCIA) via email at Compliance@fhi360.org
 - 3.3.5. FHI 360 OCIA's Ethics and Compliance Hotline:
 - 1-800-461-9330 in the U.S.;
 - +1-720-514-4400 outside the U.S.;
 - Skype: +1-800-461-9300; or
 - Country-specific hotline numbers listed on FHI 360's reporting website (see 3.1.6)
 - 3.3.6. OCIA's reporting website either with your name or anonymously (<http://www.fhi360.org/anonreportregistry>).
4. Community-Based Complaints Mechanisms (CBCMs)
- 4.1. FHI 360 is committed to ensuring that Program Participants – in both humanitarian and development settings – have culturally appropriate, gender-sensitive, safe, confidential, and accessible ways to report SEA claims. To address any barriers that Program Participants may have in accessing FHI 360's standard reporting mechanisms (outlined in Section 3.3), projects must determine whether an additional local reporting mechanism (CBCM) is

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required or needed. CBCMs do not replace FHI 360’s standard reporting mechanisms; rather, they are in addition to them:

- 4.1.1 In humanitarian settings, FHI 360-supported projects are required to participate in an inter-agency CBCM, where one exists. If an inter-agency CBCM does not exist as part of the humanitarian response, FHI 360-supported projects that operate in a humanitarian setting must establish a CBCM to ensure Program Participants have an accessible way to report harm committed by FHI 360 personnel or partner personnel. In these situations, the CBCM does not need to be an inter-agency CBCM; rather, it should be implemented at all FHI 360-supported project sites and locations.
- 4.1.2 In development settings, each project must determine if a CBCM is necessary based on project activities and known barriers that interfere with Program Participants’ ability or willingness to access FHI 360’s standard reporting mechanisms, noting that the following require one: any direct service provision to or activities that involve distributing items to Program Participants and/or projects interacting with vulnerable populations at high risk of SEA (e.g., women, children, marginalized groups).
- 4.2. CBCMs must be developed, implemented, and monitored for effectiveness, including raising awareness among Program Participants, employees, and related personnel about how to access the CBCM.
- 4.3. SEA complaints received via an inter-agency CBCM or any other local reporting mechanism in place at the country office or project level must be immediately routed/reported using one of FHI 360’s standard reporting mechanisms, as outlined in Section 3.

5. Non-Retaliation

- 5.1. FHI 360 strictly prohibits any retaliation against FHI 360 Personnel, Suppliers, Supplier Personnel, or Program Participants who complain about SEA or other violations of this policy or related procedures, or who participate in any internal or government SEA investigations. FHI 360 Personnel can refer to FHI 360’s Open Door and Non-Retaliation policy (POL 03004) for additional information.
- 5.2. Retaliation occurs when someone penalizes or threatens to penalize another person for reporting or expressing an intent to report what they believe in good faith to be SEA or any other violation of this policy, assisting others in reporting SEA or policy violations, or participating in investigations under this policy.
- 5.3. Non-retaliation protection includes all Program Participants. No Program Participant or community member will be denied participation in a program or access to aid or services for reporting suspected or known SEA or participating in a SEA investigation.
- 5.4. Suspected or known retaliation should be promptly reported via the reporting mechanisms set out in Section 3 (FHI 360 Personnel) and 14 (Suppliers).
- 5.5. FHI 360 Personnel who engage in retaliation will be subject to disciplinary action up to and including termination of employment or other relationship with FHI 360.

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6. Other Conduct That Violates This Policy


- 6.1. In addition to SEA, retaliation, and other prohibited conduct outlined above, it is also a violation of this policy for FHI 360 Personnel to:
 - 6.1.1 attempt to discourage, interfere, or impede any individual from reporting SEA
 - 6.1.2 discourage or impede any individual's participation in any investigation under this policy
 - 6.1.3 knowingly provide false information or make false claims to investigators
- 6.2. This policy recognizes that the fact a claim cannot be substantiated does not necessarily make it a false claim.

7. Support to Victims/Survivors of SEA

- 7.1. The safety of all those involved is paramount. FHI 360 Personnel involved in implementing this policy *must ensure that responding to SEA does not jeopardize the safety of a victim or survivor of SEA or an accused Respondent.*
- 7.2. During an investigation (see Section 8), FHI 360 will take measures to protect any victims/survivors or potential victims/survivors of SEA from further abuse or retaliation.
- 7.3. FHI 360 will provide referrals for support and assistance to Complainants of SEA. This may include medical treatment, legal assistance, and psychosocial support as appropriate and according to the wants and needs of the victim/survivor whilst also considering confidentiality, cultural sensitivities, and victim/survivor safety.

8. Investigation and Corrective Action

- 8.1. Upon receipt of a report of a suspected or known violation of this policy, FHI 360 will act to prevent further SEA and implement temporary remedies, which may include placing the Respondent on administrative leave (if the Respondent is an FHI 360 employee), or other measures at FHI 360's discretion to ensure safety and confidentiality and allow for a thorough and uninterrupted investigation.
- 8.2. When the subject of SEA is a child, FHI 360 will take swift and appropriate action to notify local law-enforcement, social services and/or child protection authorities in compliance with local mandatory reporting laws and take such other action deemed necessary to protect the child, so long as this will not put the Complainant at risk of immediate harm.
- 8.3. FHI 360, or independent investigators acting on FHI 360's behalf, will conduct a sensitive, timely, and thorough investigation in an impartial manner that provides all parties with appropriate due process and maintains confidentiality to the extent possible (see Section 9 for detailed information about confidentiality).
- 8.4. FHI 360 Personnel must cooperate fully with investigations and provide truthful information to investigators.
- 8.5. Investigations typically involve interviews with the Complainant and Respondent and others who may have witnessed or otherwise have knowledge of the complaint. A review of relevant records, e-mails, communications, and other facts will be completed. Specific investigation steps will vary based upon the unique circumstances of each complaint.
- 8.6. Upon completion of the investigation, FHI 360 will review the evidence collected and determine whether sexual exploitation and/or abuse, retaliation, or other violations of this or other FHI 360 policies have occurred.

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- 8.7. Where a policy violation has occurred, FHI 360 will take prompt corrective action reasonably calculated to end the SEA and to deter future violations, up to and including immediate termination of employment or other relationship with FHI 360 (See Section 10).
- 8.8. FHI 360 will cooperate with regulatory investigations and may be required to report credible allegations to law enforcement and FHI 360 funders. Such cooperation and reporting will be under the guidance of OCIA and FHI 360 persons/parties responsible for safeguarding coordination and shall include consultation with the Office of the General Counsel.

9. Confidentiality


- 9.1. FHI 360 will keep SEA reports confidential to the extent possible to ensure the privacy of the individuals involved and to maintain integrity and fairness of the investigation, while still fulfilling its obligations to investigate and end any sexually exploitative or abusive conduct.
- 9.2. Information learned through the investigation process will be disclosed only to those FHI 360 Personnel or other persons who “need to know” in order for FHI 360 to fulfill its obligations to investigate and take prompt action.
- 9.3. As required by local law, FHI 360 will provide necessary and appropriate disclosure to local enforcement agencies and will participate in investigations.
- 9.4. Nothing in this policy is intended as a guarantee of absolute confidentiality, nor is intended to curtail employee rights under any applicable laws to discuss work-related matters.

10. Consequences of Policy Violations

- 10.1. FHI 360 Personnel who violate this policy are subject to disciplinary action up to and including immediate termination of employment or other relationship with FHI 360.
 - 10.1.1 FHI 360 may take legal action when required, against FHI 360 Personnel who have been found to commit SEA, including referral to the relevant authorities for appropriate action, including criminal prosecution, in all relevant jurisdictions.
- 10.2. Program Participants who violate this policy may be removed from FHI 360 programs and barred from participation in other FHI 360 programs.
- 10.3. Violations of this policy by Suppliers or Supplier's Personnel may result in FHI 360 terminating the Supplier's contract with FHI 360. Further, FHI 360 may pursue any contractual or other legal or equitable remedies that may be available.

11. Recruiting and References

- 11.1. FHI 360, in compliance with applicable laws, will take all reasonable steps to prevent perpetrators of SEA and child abuse from being hired, re-hired, or re-deployed by FHI 360, including conducting reference and background checks for job candidates to the extent possible.
- 11.2. As allowed by applicable law, FHI 360 Personnel must immediately disclose convictions or guilty pleas of any offense that relates to sexual exploitation and abuse.

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12. Training Staff, Volunteers, and Suppliers

- 12.1. All FHI 360 staff are required to complete safeguarding training during the new employee onboarding process.
- 12.2. Additionally, more in-depth training is delivered, as needed, by Safeguarding Focal Points and project teams to FHI 360 Personnel and Supplier Personnel who interact with or have exposure to Program Participants.
- 12.3. Project teams are responsible for training volunteers who work on FHI 360-supported projects on the requirements outlined in this policy.


13. Safeguarding Risk Assessment and Action Plans

- 13.1. Projects that involve in-person or virtual interaction with Program Participants are required to assess project-level risks related to SEA and outline strategies to mitigate risks.

14. Expectations of Suppliers and Supplier Personnel

- 14.1. Suppliers and Supplier Personnel must refrain from any conduct that violates this policy.
- 14.2. FHI 360 requires that Suppliers similarly uphold the principles of this policy to prevent SEA by Supplier Personnel. Failure to do so may result in termination of Supplier's contractual relationship with FHI 360.
- 14.3. Suppliers or Supplier Personnel who witness conduct prohibited by this policy or who identify that Supplier Personnel have engaged in any such conduct must promptly report the conduct, ideally within 24 hours or as soon as possible under the circumstances, either orally or in writing, to the FHI 360 OCIA by **one** of the following means:
 - 14.3.1 FHI 360 Office of Compliance and Internal Audit (OCIA) via email at Compliance@fhi360.org
 - 14.3.2 FHI 360 OCIA's Ethics and Compliance Hotline:
 - 1-800-461-9330 in the U.S.;
 - +1-720-514-4400 outside the U.S.;
 - Skype: +1-800-461-9300; or
 - Country-specific hotline numbers listed on FHI 360's reporting website (see 14.3.3)
 - 14.3.3 FHI 360 OCIA's reporting website either with your name or anonymously (<http://www.fhi360.org/anonreportregistry>)
- 14.4 FHI 360 requires that Suppliers cooperate fully with investigations and provide truthful information to investigators.
- 14.5 FHI 360 will include the applicable funder requirements in Supplier contracts and other agreements.

For policy interpretation or questions, please contact the Chief Compliance Officer or Director of HR Partnering.

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RELATED DOCUMENTS:

1. Policies

- Code of Ethics & Conduct
- POL 01029: Combating Trafficking in Persons
- POL 01030: Safeguarding of Children
- POL 03003: Professional Standard of Conduct
- POL 03004: Open Door and No Retaliation
- POL 03011: Employee Discipline
- POL 03029: Harassment-Free Work Environment
- POL 03041: Violence-Free Work Environment
- POL 03051: Administrative Leave

2. Standard Operating Procedures

- N/A

3. Appendices


- N/A

REFERENCES:

1. United Nations Secretary General’s Bulletin on Special Measures for protection from sexual exploitation and abuse (ST/SGB/2003/13)
2. Interagency Standing Committee (IASC) Six Core Principles (2019)

REVISION HISTORY:

POL#	Date Reviewed DD MMM YYYY	Summary of Changes
POL 01032	Jan 2019	New
POL 01032	05 JUN 2019	Clarified language in 4.1.1 regarding Community Based Complaints Mechanisms in humanitarian settings. Changed definitions for FHI 360 Employees and Personnel New definitions and language regarding Suppliers and Supplier Personnel.
POL 01032	14 JUN 2021	Changed policy statement to prohibit any sexual relationship between personnel and Program Participants.
POL 01032	15 DEC 2021	Revised definitions of CBCM and added PSEA. Updated UN Principles to those dated 2019. Revised 1.2.4 with footnote. Updated reporting mechanisms and requirement for Supervisors and HR staff to report promptly to HQ HR or OCIA. Updated language to include prohibiting retaliation by Suppliers and Supplier Personnel. Revised section on requirements related to CBCMs. Added items 12 and 13.
POL 01032	11 FEB 2022	Updated scope under “Purpose” to include research projects.
POL 01032	21 JUL 2023	Minor administrative change to update section 3.1.3 with titles vs. specific employee names.

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REVISION HISTORY

Version 01 Effective on 26-Jun-2019

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Version 02 Effective on 16-Jun-2021

Changed policy statement to prohibit any sexual relationship between personnel and program participants. this policy had been collaborated with Kathy Stroker (Legal), Kristen Lingo (Legal), Susan Voskuil (CMS), Pam Myers (HR), Sean Temeemi (OCIA), Andrea Bertone (Operations) and Kim Dixon (Operations) 14JUN2021

Version 03 Effective on 22-Jan-2022

Revised definitions of CBCM and added PSEA. Updated UN Principles to those dated 2019. Revised 1.2.4 with footnote. Updated reporting mechanisms and requirement for Supervisors and HR staff to report promptly to HQ HR or OCIA. Updated language to include prohibiting retaliation by Suppliers and Supplier Personnel. Revised section on requirements related to CBCMs. Added items 12 and 13. The reviewer included the following comments: Kathy Stroker (General Counsel), Pam Myers (HR), Susan Voskuil (CMS), Sean Temeemi (OCIA), Kim Dixon (GESSI), Andrea Bertone (GESSI), Lilian Esemere (GESSI).

Version 04 Effective on 18-Apr-2022

Updated scope under "Purpose" to include research projects. Reviewed by Kim Dixon (GESSI) and Sara Tenorio (Research Ethics).

DOCUMENT ELECTRONIC SIGNATURES

DOCUMENT APPROVAL WORKFLOW

Author Approval

Kristen Lingo
klingo@fhi360.org

I am the author of this document.
Signed 8:21:57 PM UTC 23-Feb-2022

Required Workflow Steps for this Category

Maya Tremelling
mtremelling@fhi360.org

Document Manager Approval
I have reviewed and approve this document.
Signed 9:10:32 PM UTC 23-Feb-2022

Kathy Stroker
kstroker@fhi360.org

Policy Owner Approval
I have reviewed and approve this document.
Signed 7:59:37 PM UTC 04-Mar-2022

Larry Origlio
loriglio@fhi360.org

Policy Reviewer Approval
I have reviewed and approve this document.
Signed 7:26:12 PM UTC 17-Mar-2022

Tessie San Martin
tsanmartin@fhi360.org

Policy Exec Approval
I have reviewed and approve this document.
Signed 8:46:29 PM UTC 19-Mar-2022