

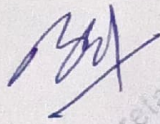
# **Society to Uplift Rural Economy (SURE)**

**Protection against Sexual Exploitation and Abuse**

## **SOCIETY TO UPLIFT RURAL ECONOMY (SURE)**

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Joint Secretary  
Society to Uplift Rural Economy  
BARMER (Raj)

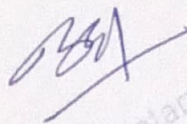


## **About SURE Organisation:**

SURE is a non-governmental organisation receiving government subvention to deliver welfare services. The organisation is fully committed to the principle of honesty, integrity and fair play in the delivery of services to the public. All staff should ensure that the businesses of SURE, such as applications for services, procurement or staff recruitment, are dealt with in an open, fair and impartial manner.

SURE has a zero tolerance for sexual exploitation and abuse. SURE will not tolerate its staff, associates, partners or any other representatives associated with the delivery of its work to engage in any form of sexual exploitation or abuse. Vulnerable adults, women and children are particularly at risk of sexual exploitation and abuse. SURE is committed to protecting all communities that the organisation works with from sexual exploitation and abuse at all times. Please see definitions for a full outline that is included in the community.

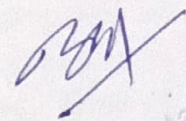
The purpose of the PSEA Framework, including the policy, procedures and resources, is to establish an outline of the importance of the framework and clear procedures. This policy ensures that all SURE staff, associates, and partners are aware of their role and responsibilities in keeping communities and stakeholders safe from any form of sexual exploitation or abuse. The policy clarifies definitions and responsibilities regarding prohibited behavior and the associated PSEA procedures outline the reporting and investigation processes.

  
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EARMER (raj)



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## PSEA Policy

### Introduction:

This is a guide that ensures all organizational and human resource systems and processes dutifully address the agency's commitment to the Protection from Sexual Exploitation and Abuse (PSEA) in line with Safeguarding Policy, Child safeguarding Policy, PSEA Policy and Code of Conduct.

### Objectives :

The objectives of this guide include :

- To ensure the prevention of sexual exploitation and abuse is consistently and systematically addressed across Human Resource and Organizational processes
- To strengthen the Safeguarding systems in place for Staff, Associated Personnel and contractors;
- To create a conducive working environment free from sexual exploitation and abuse where all staff are aware of and take responsibility for their obligations in regards to upholding the Safeguarding Policy, Child safeguarding Policy, PSEA Policy and Code of Conduct and commitments as humanitarian professionals.

### Scope / Policy Approach :

This policy details how SURE achieves its obligations and applies to all staff, associates and partners regardless of their location.

### Framework Principles

This policy and the entire Safeguarding Framework are guided by the following principles:

#### 1. Safeguarding :

SURE is committed to all community members as outlined in the definitions as having the right to safeguarding and protection from sexual exploitation and abuse irrespective of ability, ethnicity, faith, gender, sexuality, and culture. A key principle within this is that all processes are survivor led. SURE commits to survivors leading the complaint process where it is possible and appropriate to do so.

#### 2. Shared Responsibility

For the PSEA policies and practices to be effective in reducing the risks to beneficiaries and communities, all at SURE must share the responsibility for implementation and improvement. As such, a failure at one level of the organization constitutes a failure at all levels of the organization.



### **3. Effective Communication**

SURE effectively communicates with all staff, associates, and partners in simple and accessible language to create a positive and accessible culture where responsibilities for PSEA are clear.

### **4. Continuous Improvement**

SURE provides assessment, reflection and feedback mechanisms to inform the organisation of any improvements that can be made to policies and practices.

These mechanisms include quarterly incident reviews, regular safeguarding audits, as well as regular policy review and refresher training.

### **5. Dignity and Respect**

SURE creates a work environment where the principles of dignity and respect for all staff, associates, and partners, in all locations are at the heart of what the organization does. Included in this are the principles of being non-judgmental when hearing the concerns and complaints of survivors of sexual exploitation and abuse.

### **6. Zero Tolerance**

SURE has zero tolerance for any forms of sexual exploitation and abuse.

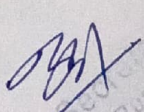
### **7. Confidential**

SURE is committed to confidentiality and information will not be shared outside of the Safeguarding Committee unless it is absolutely necessary, and the safety of the person involved is a concern.

## **SURE's Obligations**

SURE believes that all people have a right to live their lives free from sexual exploitation and abuse and will not tolerate its staff, associate, or partners engaging in any sort of behavior that puts beneficiaries or communities at risk. To that end, SURE commits to:

1. Creating a safe culture for both those it serves and those who work for and represent the organization.
2. Following through on any complaints and concerns in a timely manner through its Safeguarding Committee and taking each complaint seriously.
3. Sensitizing staff, associates, and partners, around how to make a complaint.
4. Ensuring zero tolerance towards sexual exploitation and abuse.
5. Building a culture of dignity, honor and respect where all those who work with and are served by SURE feel empowered to report complaints.
6. Educating staff, associates, and partners that sexual exploitation and abuse constitute gross misconduct and are grounds for termination of employment and possibly legal action.
7. Providing information on how to report complaints and the investigation procedure.
8. Ensuring that all staff, associates, and partners have access to the PSEA policy and procedures as well as all other related safeguarding policies.

  
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9. Providing training to all staff, associates, and partners on PSEA.

### **PSEA Commitments :**

All SURE staff, associates, and partners are expected to conduct themselves in accordance with the PSEA policy. Following are the core commitments relating to sexual exploitation and abuse that all staff, associates, and partners are expected to follow. The following behaviours are prohibited:

**1. Sexual Activity with Children and Vulnerable Adults**

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

Sexual activity with vulnerable adults, as outlined in the definitions, is also prohibited.

**2. Child Marriage**

Any staff, associates, or partners who engage in child marriage (marriage to anyone under the age of 18) will be in violation of the PSEA policy. As per the definition of child marriage, anyone under the age of 18 is not able to give or withhold consent and is considered a form of sexual violence. Any staff married to a child under the age of 18 as per the custom or law of their country, before the SURE PSEA policy came into force will not be subject to disciplinary action. SURE, however, prohibits any such relationship from occurring once the PSEA policy came into effect.

**3. Sexual Activity with SURE Beneficiaries**

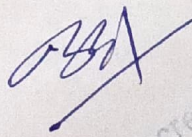
Sexual activity with any beneficiary is prohibited due to inherently unequal power imbalances. An SURE beneficiary is defined as anyone who receives services or support from SURE or an SURE partner.

**4. Grooming and/or Coercion**

Any grooming and/or coercion of a child or vulnerable adult for the purposes of obtaining sex is prohibited.

**5. Sexual Exploitation**

Any form of sexual exploitation is prohibited including:

  
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- **Buying Sex** : Exchange of money, material assistance, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitive behaviour is prohibited.
- **Profiting from Sexual Exploitation** : Any monetary, social or political gain from sexual exploitation is prohibited.

#### 6. Sexual Harassment

Any act of sexual harassment including unwelcome sexual advances or requests for sexual favours is prohibited both under the PSEA policy and the Anti-Harassment policy.

#### 7. Sexual Violence

Any acts of sexual violence as outlined in the definitions in prohibited. This includes, but is not limited to, sexual violence including intercourse, sexual touching, and threats of sexual violence.

#### 8. Physical/Emotional Abuse

As outlined in both the Child Safeguarding and the Adult Safeguarding policies, any physical or emotional abuse is prohibited.

This list may be expanded at any time and details will be communicated with staff, associates and partners through the Safeguarding Committee. Additional prohibited behaviours related to abuse can be found in the Child Safeguarding and Adult Safeguarding policies.

### SUITE with HR Tools:

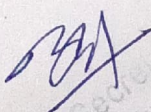
The following practices will be applied in HR and organizational processes. HR departments are to review the following and indicate current status, to be followed by implementation of action plan to address any gaps in compliance.

The Suite accompanying this guide has a number of HR tools within the Employee Life Cycle adapted with a Safeguarding, Child safeguarding and PSEA lens.

#### 1. Recruitment & Interviews:

Applicants must self-declare prior issues of sexual or other misconduct, termination of past employment, criminal records, and concerns registered with government authorities regarding contact with children. Consent must be given during application to the disclosure of any such information by their former employers during verification of references.

References / Background checks are conducted (e.g. police records, Google searches) with consistent references contacted to vet for former misconduct in accordance with local laws regarding employment, privacy and data protection

  
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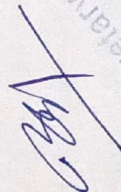
2. **Orientation:** During the orientation process, the employee is systematically taken through the Safeguarding, PSEA and child safeguarding policies and Code of Conduct and the SEA complaints and investigations mechanisms. Staff are given the time to discuss and fully understand the policies and procedures. Practically consider creating shorter and clearer Safeguarding, Child safeguarding, PSEA policies and Code of Conduct, and design infographics to ensure that the points are well communicated and understood with locally relevant language and examples when necessary.

3. **Performance Management :** Performance management and appraisal processes include specific objectives related to adherence to the PSEA, safeguarding policies and Code of Conduct (e.g. participation in Safeguarding and PSEA trainings, contribution to awareness raising, serving as Safeguarding and PSEA focal point)

4. **Code of Conduct:** In cases of confirmed misconduct, robust disciplinary action (e.g. dismissal, suspension, written censure or other administrative/corrective measures) are consistently taken and, where this involves possible criminal conduct, reported as appropriate to local law enforcement authorities. Need to have a clear process where the risks for the survivor or victim and the quality of services are assessed before reporting to law enforcement.

5. **Awareness Raising/Trainings :** HR Managers are responsible for ensuring that a training strategy is being implemented to raise awareness of gender, Gender Based Violence (GBV), human rights, sexual exploitation and abuse prevention and response and the Code of Conduct amongst all staff and how to report incidences, whether substantiated or not. (This includes volunteers, consultants, contractors, incentive staff, security guards)

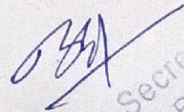
Getting regular input from staff on what is working and what is not on awareness raising, what they understand, what they don't to ensure there is regular response to the internal accountability system

  
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## **PSEA Complaint Handling Procedure:**

1. **Reporting :** It is the responsibility of the staff member to report a concern/complaint via the following process:
  - a. The first point of contact should be the designated PSEA Focal Point.
  - b. It is suggested that the complaint should be recorded or should be written using a standard complaint intake form (Annex A – Sexual Exploitation and Abuse intake form), which should be signed and dated. **SURE** must ensure that the individual who makes a complaint is informed of the **SURE's** policy on confidentiality. **SURE** may wish to obtain a written consent from the complainant for the information to be made available to others within the complaint management system.
  - c. Once a complaint or report is made, the PSEA focal point who receives the information should immediately report it to Organisation's designated **PSEA Co-ordinator** at organisation and/or the most senior member of staff of the organization.
  - d. If the complaint involves staff of other other organisation or non-staff personnel, such agencies must be informed of the complaint via established inter-agency mechanisms.
  - e. Where the complaint involves personnel of more than one agency, consideration must be given to conducting a joint investigation in the interests of information and resource sharing, as well as limiting the number of interviews necessary.
  - f. The Head of Office must inform the subject of the complaint against them. He or she must be given an opportunity to answer the allegations in writing and to produce evidence to the contrary.
2. **Record keeping :** A detailed record of information gathered via the complaints protocol should be kept confidentially on file as it may be used in subsequent disciplinary or legal action. Every effort must be made to ensure the security of such files.
3. **Needs of the Survivor :** Urgent medical assistance and counselling must be made available to anyone who was potentially harmed by any alleged sexual exploitation or sexual abuse. This will generally be through referral to the appropriate service provider. The physical and psychological wellbeing of any such survivor must be a primary concern throughout the reporting and investigation process.
4. **Disciplinary Action :**
  - a) The report of any investigation will be submitted to the Head of Organisation who will, in consultation with the focal point and Head of Mission or PSEA Co-ordinator, decide upon an appropriate course of action.
  - b) If the investigation indicates that misconduct has not occurred, the case will be closed.

  
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NER (Raj.)



- c) If the investigation indicates that misconduct has occurred, the matter will be referred to the head of administration with a recommendation for disciplinary action, including possible summarily dismissal, pursuant to Organization' Staff Rules and Regulations. (Legal action to be taken if required).

### **Safeguarding Committee**

A Safeguarding Committee has been established at the organization level as well as in each field location. The Safeguarding Committee is comprised of 5 members:

1. Lata Kachhawa (Joint Secretary)

2. Three members-

Mr. Hanuman Chaudhary (Project Coordinator-DDAHP)

Mr. Vinay Kumar Singh (KVK)

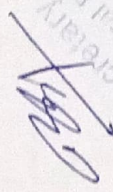
Mrs. Navneet Pachauri

3. Mrs. Asha Waghela (Senior Professor)

All Safeguarding Committees will ensure that there is diversity and equal gender representation on the committee.

The Safeguarding Committee will be responsible for informing and training all staff in safeguarding, PSEA and harassment policies and procedures. They will also be responsible for receiving and investigating any safeguarding complaints, including PSEA.

The Safeguarding Committees will be trained in all of the Safeguarding policies as well as reporting and investigations. The Safeguarding Committee will also be provided with specialized psychological first aid training so that they are able to offer appropriate support as required.

  
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(Joint Farmer Field)



## Annex A – Sample Sexual Exploitation and Abuse Allegation Intake Form

FILE NUMBER: \_\_\_\_\_

Gathering information at the time of reporting is a crucial element of the process. The report should be objective and precise, focusing on the facts and relevant information that will help when it is time to act.

When a child discloses maltreatment or abuse, make sure to ask the questions needed to have a clear understanding of what the child is saying and to ensure the security and welfare of the child. DO NOT SEARCH FURTHER.

- Inform the person that all information given in the complaint will remain confidential.
- Be receptive of the complainant and listen to what he or she has to say.
- Write a clear record of what is said by the complainant in their own words. Take the time to cross-check with the complainant that you understand everything before writing.
- Allow the complainant to read what you have written. If the complainant is illiterate, read out the text to ensure that what you have written is what he or she meant. Ask the person if he or she is satisfied with what you have written. If they are not, correct the text with them.

**DATA PROTECTION – Ensure that this form, once completed, is stored in a locked file.**

### Complainant information

Full name:	Date of complaint:
Telephone:	Address:

**The complaint** (Use the complainant's own words and ask questions to get as much important information as possible. At a minimum, the complainant should indicate who, what, how, where and when the complaint is about)

*[Signature]*  
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**Template 1 : Information about the Survivor**

Date of the incident (when): \_\_\_\_\_  
\_\_\_\_\_

Full name of the survivor (who) – fill only if consent is given:  
\_\_\_\_\_  
\_\_\_\_\_

Age of the survivor:  
\_\_\_\_\_

Where: \_\_\_\_\_  
\_\_\_\_\_

How: \_\_\_\_\_  
\_\_\_\_\_

**Template 2 : Information about the accused**

Name of accused: \_\_\_\_\_

Position held by accused: \_\_\_\_\_

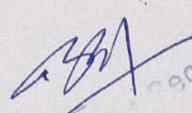
Organization for which the accused work(s): \_\_\_\_\_

Relationship to the survivor:  
\_\_\_\_\_

Current residence of the accused (if known): \_\_\_\_\_  
\_\_\_\_\_

Gender: \_\_\_\_\_  
\_\_\_\_\_

Physical description of accused: \_\_\_\_\_  
\_\_\_\_\_

  
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**Template 3 : Service provision**

Has the survivor been informed of the available medical care?	Yes	No
If yes, has the survivor sought medical treatment after the incident?	Yes	No
If yes, who provided treatment? _____		
_____		
If no, provide information to the complainant regarding the nearest medical care and psycho social support services, or get the consent of the survivor to pass on their details (using the form below) to refer them.		
Has the survivor contacted police?	Yes	No

**Consent, confidentiality and next steps**

Explain to the complainant that you are under an obligation to report allegations of sexual exploitation and abuse to donors, but that identifying information about the complainant, the survivor and the name of the alleged perpetrator will not be shared *unless otherwise indicated*. However, for the purposes of an investigation, the name and contact details of the complainant will be necessary.

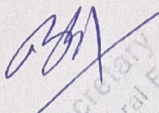
Complainant consents to sharing name and contact details for investigation purposes: Yes / No

Inform the complainant that the organization conducting the investigation will keep in contact with them to keep them informed of the progress of the complaint.

Name of the PSEA/Safeguarding Focal Point: \_\_\_\_\_

PSEA Co-ordinator Name: \_\_\_\_\_

Head of the Organization' Name : \_\_\_\_\_

  
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