

SAVE THE CHILDREN'S POLICIES;

- Child Safeguarding
- fraud, bribery and corruption
- IAPG – code of conduct
- Human trafficking and Modern Slavery
- SCI PSEA Policy Final Approved March 2019



SAVE THE CHILDREN'S CHILD SAFEGUARDING POLICY

Our values and principles

Child abuse is when anyone under 18 years of age is being harmed or isn't being looked after properly. The abuse can be physical, sexual, emotional or neglect. The abuse and exploitation of children happens in all countries and societies across the world. Save the Children believes that deliberate harm such as this is not acceptable.

Save the Children is also aware that children can also be harmed through preventable accidents or incidents.

It is expected that all who work with Save the Children are committed to safeguard the children whom they are in contact with and that deliberate acts to harm as well as preventable unintended harm are not tolerated.

What we do

Save the Children is committed to safeguard children through the following means:

Awareness: Ensuring that all staff and those who work with Save the Children are aware of the problem of child abuse and the risks to children.

Prevention: Ensuring, through awareness and good practice, that staff and those who work with Save the Children minimise the risks to children.

Reporting: Ensuring that you are clear on what steps to take where concerns arise regarding the safety of children.

Responding: Ensuring that action is taken to support and protect children where concerns arise regarding possible abuse.

To help you clarify our safeguarding approach, we list here examples of behaviour which is prohibited. These include but are not limited to:

1. Hitting or otherwise physically assaulting or physically abusing children.
2. Engaging in sexual activity or having a sexual relationship with anyone under the age of 18 years regardless of the age of majority/consent or custom locally. Mistaken belief in the age of a child is not a defence.
3. Developing relationships with children which could in any way be deemed exploitative or abusive.
4. Acting in ways that may be deliberately abusive in any way or may place a child at risk of harm or abuse.
5. Failing to take action that prevent accidents or harm.
6. Using language, making suggestions or offering advice which is inappropriate, offensive or abusive.
7. Behaving physically in a manner which is inappropriate or sexually provocative.
8. Sleeping in the same bed or same room as a child, or having a child/children with whom one is working to stay overnight at a home unsupervised.
9. Doing things for children of a personal nature that they can do themselves.



10. Condoning, or participating in, behaviour of children which is illegal, unsafe or abusive.
11. Acting in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse.
12. Discriminating against, showing unfair differential treatment or favour to particular children to the exclusion of others.
13. Spending excessive time alone with children away from others.
14. Placing oneself in a position where one is made vulnerable to allegations of misconduct.

In order that the above standards of reporting and responding are met, **this is what is expected of you:**

If you are worried that a child or young person is being abused or neglected, (such as in points 1, 2, 3, 4, 6, 8, 9 and 10 above for example) or you are concerned about the inappropriate behaviour of an employee, or someone working with Save the Children, towards a child or young person, then you are obliged to:

- act quickly and get help
- support and respect the child
- where possible, ensure that the child is safe
- contact your Save the Children contact point (or their manager if necessary) with your concerns immediately
- keep any information confidential between you and the person you report this to.

If you want to know more about the Child Safeguarding Policy then please ask your Save the Children contact point.

SAVE THE CHILDREN'S FRAUD, BRIBERY AND CORRUPTION POLICY

Our values and principles

Save the Children has a "zero tolerance" policy towards fraud, bribery and corrupt practices (see definitions below).

All Save the Children employees, partners and vendors have a duty to protect the assets of Save the Children and to comply with relevant laws (including the UK Bribery Act 2010). Save the Children does not allow any partner, supplier, sub-contractor, agent or any individual engaged by Save the Children to behave in a dishonest manner while carrying out Save the Children's work.

What we do

Save the Children is committed to preventing acts of fraud, bribery and corruption through the following means:

Awareness: Ensuring that all staff and those who work with Save the Children are aware of the problem of fraud, bribery and corruption.

Prevention: Ensuring, through awareness and good practice, that staff and those who work with Save the Children minimise the risks of fraud, bribery and corruption.

Reporting: Ensuring that all staff and those who work with Save the Children are clear on what steps to take where concerns arise regarding allegations of fraud, bribery and corruption.

Responding: Ensuring that action is taken to support and protect assets and identifying cases of fraud, bribery and corruption.

To help you identify cases of fraud, bribery and corruption, some examples have been set out below, however this list is not exhaustive. If in doubt, contact your Save the Children representative or email scifraud@savethechildren.org:

- a) Paying or Offering a Bribe – where a person improperly offers, gives or promises any form of material benefit or other advantage, whether in cash or in kind, to another in order to influence their conduct in any way.
- b) Receiving or Requesting a Bribe – where a person improperly requests, agrees to receive or accepts any form of material benefit or other advantage, whether in cash or in kind, which influences or is designed to influence the individual's conduct in any way.
- c) Receiving or Paying a so-called 'Grease' or 'Facilitation' payment – where a person improperly receives something of value from another party for performing a service or other action that they were required by their employment to do anyway.
- d) Nepotism or Patronage – where a person improperly uses their employment to favour or materially benefit friends, relatives or other associates in some way. For example, through the awarding of contracts or other material advantages.
- e) Embezzlement - where a person improperly uses funds, property, resources or other assets that belong to an organisation or individual.
- f) Receiving a so-called 'Kickback' Payment – where a person improperly receives a share of funds, a commission, material benefit or other advantage from a supplier as a result of their involvement in a corrupt bid or tender process.

g) Collusion – where a person improperly colludes with others to circumvent, undermine or otherwise ignore rules, policies or guidance.

h) Abuse of a Position of Trust – where a person improperly uses their position within their organisation to materially benefit themselves or any other party.

i) Conflict of interest - where an individual knowingly has an undisclosed business interest in an entity involved in a commercial relationship with Save the Children.

j) Procurement fraud - where an individual engages in any dishonest behaviour relating to procurement or tendering process, e.g. falsely created bids or quotes.

k) Supply chain fraud - where an individual misdirects or steals goods, forges stock records, or creates fictitious companies through which to channel payments.

In order that the above standards of reporting and responding are met, **this is what is expected of you:**

You have a duty to protect the assets of Save the Children from any form of dishonest behaviour. Furthermore, you must immediately report any suspicion of fraud, bribery or corruption to Save the Children. Failure to report will be treated as serious and may result in termination of any agreement with Save the Children.

You are obliged to:-

- act quickly and get help through the channels mentioned below
- encourage your own staff to report on fraud, bribery and corruption
- contact a member of the Save the Children senior management team, (which includes the Country Director) and/or the Save the Children Head of Fraud Management at scifraud@savethechildren.org with the concerns immediately
- keep any information confidential between you and the person you report this to.

Attempted fraud, bribery and corruption is as serious as the actual acts and will be treated in the same way under this policy.

If you want to know more about the Fraud, Bribery and Corruption Policy then please ask your Save the Children contact point.

SAVE THE CHILDREN'S HUMAN TRAFFICKING AND MODERN SLAVERY POLICY

1. Our values and principles

Save the Children does not allow any partner, supplier, sub-contractor, agent or any individual engaged by Save the Children to engage in human trafficking or modern slavery.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

2. What is human trafficking and modern slavery?

The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

Modern slavery, including human trafficking, is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our national and international disclosure obligations, and shall comply with all applicable laws, statutes, regulations and codes from time to time in force, including:

- UK Modern Slavery Act 2015 (see above);
- US Trafficking Victims Protection Act 2000;
- USAID ADS 303 Mandatory Standard Provision, Trafficking in Persons (July 2015); and
- International Labour Standards on Child Labour and Forced Labour.

3. Our approach to preventing human trafficking and modern slavery

Save the Children is committed to preventing human trafficking and modern slavery, including through the following means:

Awareness: Ensuring that all staff and those who work with Save the Children are aware of the problem of human trafficking and modern slavery.

Prevention: Ensuring, through awareness and good practice, that staff and those who work with Save the Children minimise the risks of human trafficking and modern slavery.

Reporting: Ensuring that all staff and those who work with Save the Children are clear on what steps to take where concerns arise regarding allegations of human trafficking and modern slavery.

Responding: Ensuring that action is taken to identify and address cases of human trafficking and modern slavery.

To help you identify cases of human trafficking and modern slavery, the following are examples of prohibited categories of behaviour:

- a. **'chattel slavery'**, in which one person owns another person.
- b. **'Bonded labour' or 'debt bondage'**, which is when a person's work is the security for a debt – effectively the person is on 'a long lease' which they cannot bring to an end, and so cannot leave their 'employer'. Often the conditions of employment can be such that the labourer can't pay off their debt and is stuck for life, because of low wages, deductions for food and lodging, and high interest rates.
- c. **'Serfdom'**, which is when a person has to live and work for another on the other's land.
- d. **Other forms of forced labour**, such as when passports are confiscated (sometimes by unscrupulous recruitment agencies) from migrant workers to keep them in bondage, or when a worker is 'kept in captivity' as a domestic servant. If a supplier or contractor appears to impose excessively harsh working conditions, or excessively poor wages, then you should always be alive to the possibility that a form of forced labour is occurring, and take care with your due diligence.
- e. **'Child slavery'**, which is the transfer of a young person (under 18) to another person so that the young person can be exploited. Child labour may, in fact, be a form of child slavery, and should not be tolerated. See the Save the Children Child Safeguarding Policy for further details.
- f. **'Marital and sexual slavery'**, including forced marriage, the purchase of women for marriage, forced prostitution, or other sexual exploitation of individuals through the use or threat of force or other penalty.

4. The commitment we expect from commercial partners

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we may include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Please contact your Save the Children representative if you have further questions.

CODE OF CONDUCT FOR IAPG AGENCIES AND SUPPLIERS

Suppliers and manufacturers to Non-Governmental Organisations (NGO's) should be aware of the Code of Conduct initiatives that the Inter-Agency Procurement Group (IAPG) support. This information is to advise you, our suppliers, of the Corporate Social Responsibility (CSR) element in our supplier relationships.

- Goods and services purchased are produced and developed under conditions that do not involve the abuse or exploitation of any persons.
- Goods produced and delivered by organisations subscribe to no exploitation of children
- Goods produced and manufactured have the least impact on the environment

Code of Conduct for Suppliers:

Goods and services are produced and delivered under conditions where:

- Employment is freely chosen
- The rights of staff to freedom of association and collective bargaining are respected.
- Living wages are paid
- There is no exploitation of children
- Working conditions are safe and hygienic
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment of staff is allowed.

Environmental Standards:

Suppliers should as a minimum comply with all statutory and other legal requirements relating to environmental impacts of their business. Areas to be considered are:

- Waste Management
- Packaging and Paper
- Conservation
- Energy Use
- Sustainability

Business Behaviour:

IAPG members will seek alternative sources where the conduct of suppliers demonstrably violates anyone's basic human rights, and there is no willingness to address the situation within a reasonable timeframe.

IAPG members will seek alternative sources where companies in the supply chain are involved in the manufacture of arms or the sale of arms to governments which systematically violate the human rights of their citizens.

Qualifications to the statement

Where speed of deployment is essential in saving lives, IAPG members will purchase necessary goods and services from the most appropriate available source.

Disclaimer

This Code of Conduct does not supersede IAPG Members' individual Codes of Conduct. Suppliers are recommended to check the Agencies' own websites.

SCI POLICY: PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE (PSEA)

Functional Area:	People and Organisation
Owner (Name + Position):	Chet Kuchinad, Chief People Officer
Approved by:	Senior Leadership Team
Date of Approval:	14/03/2019
Version:	VI
Date for Review:	14/03/2020 (Initially after one year and then after 3 years)
Languages (Inc. hyperlinks):	English, French, Spanish, Arabic plus any other to ensure the document is fully understood
Applicable to:	All staff, Save the Children members' staff deployed/seconded to SCI, 'all third parties: partners, implementing partners, consultants, contractors, visitors and volunteers involved in the work of SCI'

SECTION I: PURPOSE

This policy is specifically concerned with the **Protection from Sexual Exploitation and Abuse (PSEA) of adults. This includes direct or indirect beneficiaries of our programming and adults in the wider communities in which we work.**

For anyone under 18, refer to the Child Safeguarding Policy. For issues in relation to staff refer to the Global Anti - Harassment policy which covers sexual harassment, SEA and bullying of SCI staff.

The PSEA policy contains essential principles and rules that reflect the behaviours and standards expected from employees, trustees, volunteers, interns, trainees, consultants, partners, and other representatives working for, or contracted on behalf of SCI in any capacity and covers our international development and humanitarian work.

SCI is aware that employees and other representatives working for or on behalf of the organisation frequently work in situations where they are in positions of power and where they are granted high levels of trust (in relation to the people we are trying to reach, vulnerable adults, vulnerable communities, as well as non-vulnerable individuals, other organisations and one another).

This power and trust must never be abused and everyone in the organisation has an obligation and responsibility to maintain the highest professional and ethical standards in their day-to-day conduct.

We recognise that our work, particularly humanitarian interventions, may exacerbate and reinforce existing gender inequalities and/or increase inequitable power structures and dynamics within the communities we are working. These inequalities may also be inter-linked with other marginalising factors, such as age, disability, ethnic identity, faith, sexuality or religious affiliations, etc. These factors can reinforce dependency and vulnerability.

Sexual exploitation and abuse commonly involves on-going threats, grooming, and an escalation of behaviour that contributes to a harmful environment of potential and actual abuse as well as isolated single incidents¹. SCI's policy therefore supports the reporting of **all** issues of concern, to enable early intervention and action. SCI recognises that under-reporting is very common and understands increases in reporting as an indication of trust in the reporting and response systems rather than as necessarily an increase in SEA.

SCI is committed to reducing the opportunities for abuse and exploitation to happen through effective prevention, ensuring that survivors are not exposed to further harm through good reporting and responses, and ensuring that survivors receive appropriate care. Effective prevention and providing safe responses requires all staff, volunteers, interns, partners and other representatives to be clear about their individual accountabilities and responsibilities. It also requires all senior staff and managers to ensure that their working environments minimise the opportunities for sexual exploitation and abuse, and to ensure that reporting and response do not expose survivors or reporters to any further harm. Sexual exploitation and abuse (SEA) is a gross breach of both standards of aid, and of the rights of those in need²³.

We are committed to ensuring safeguarding measures are embedded, accessible, and communicated clearly to staff, partners, vulnerable adults and their communities, in languages and formats they understand. SCI has a clear commitment to a policy of **Zero Tolerance of Sexual Exploitation and Abuse**, in line with the UN Secretary-General's Bulletin (ST/SGB/2003/13)⁴. The PSEA Framework applies to SCI direct programming, and implementing partners, as representatives of SCI's values and principles, and this policy is intended to articulate the definitions, boundaries and expectations of SCI and our representatives in relation to PSEA in the pursuit of our work.

**The PSEA policy applies 24 hours a day, 7 days a week and 365 days a year.
Any breach of the policy will be taken extremely seriously and responded to.
Breaches of the policy may be grounds for termination of engagement with
SCI.**

¹ <https://www.chsalliance.org/what-we-do/psea/psea-handbook>

² <https://www.chsalliance.org/what-we-do/psea/psea-handbook>

³ <https://interagencystandingcommittee.org/product-categories/protection-sexual-abuse-and-exploitation>

⁴ <https://oios.un.org/resources/2015/01/ST-SGB-2003-13.pdf>

SECTION 2: POLICY STATEMENT(S)

1	<p>This policy relates to those over 18, who are defined as adults, and are direct or indirect beneficiaries, or in the communities where SCI works.</p>
2	<p>Awareness</p> <p>All staff, volunteers, interns and representatives, and partners working in any position or capacity with SCI will be provided with copies of the relevant policies and expected to adhere to the values, standards, behaviours and procedures contained therein. Failure to comply with these standards and procedures may be gross misconduct and grounds for termination of involvement with the organisation. Behaviour that is criminal will be reported to the relevant authorities unless it poses a significant risk to survivors or there is another justifiable risk in reporting. These standards are applicable 24/7, in personal life as well as in work capacities.</p> <ul style="list-style-type: none"> • All staff, volunteers and interns will be required to undertake and be able to demonstrate they have completed the compulsory face to face PSEA awareness training within the first three months of their employment or three months following the publication of this policy for existing employees. An initial briefing to ensure they understand and have signed the policy will be done during their first week of basic induction. • For all national and international staff travelling to the field and having direct contact with beneficiaries and communities in our project areas, additional PSEA training must be completed prior to travel. This will be face to face training conducted by the PSEA focal point or through a webinar briefing. • PSEA training will reference the SCI Gender Equality Policy and the organisational mandate to address gender inequality across four pillars: programme, partner, advocate and organise. • Each supplier, partner and consultant must confirm their knowledge of and adherence to the principles of this policy as part of their contractual relationship with SCI. • Partners will be made aware from their initial contact with SCI of the required safeguarding standards to protect vulnerable adults from SEA within the specific context they will be working in. • All consultants and visitors to SCI country programmes, including but not limited to journalists, donors, supporters, members of staff and representatives, must be appropriately briefed on PSEA for the nature of their work/visit, expected behaviour and how to report, beforehand and within 48 hours of arriving in country. • Managers and supervisors are required to ensure the provision and resources to support engagement in these trainings and failure to do so may be grounds for disciplinary action. Staff, volunteers and interns are responsible for ensuring their participation and engagement in this induction training. <p>SCI takes the position that early reporting of any concern supports both prevention of further abuse and safe response. There must be increased</p>

	<p>awareness about reporting, including the importance of reporting of any and all concerns, however apparently minor.</p> <p>Our staff, volunteers, interns and all other representatives and partners must never:</p> <ul style="list-style-type: none"> - Engage in a sexual relationship with a member of a vulnerable community, unless they are part of the same community and the relationship has not arisen as part of their role with SCI; - Engage in sexually abusive or exploitative relationships with members of the communities in which we work, within the workplace or with domestic staff; - Engage in exploitative sexual relationships with beneficiaries of direct or indirect assistance (the parent or caregiver of children benefitting from SCI programming, for example) from SCI; - Engage the services of sex workers, irrespective of the local or national laws or norms regarding sex work or the laws of their home country or the location in question; - Infer, suggest, request, and/or demand any sexual favours from members of the communities in which we work, in return for anything – including protection, assistance (goods, services, resources, opportunities), or employment, nor imply the same; - Support or take part in any form of sexually exploitative or abusive activities, including the trafficking of human beings, or sexual or exploitative relationships with human beings who have been trafficked; and - Fail to report any allegations, causes for concern, or suspicions of the sexual exploitation and/or abuse of another person. <p>Reporting mechanisms, communication, multiple forms of engagement used to increase the awareness of issues and reporting to individuals and communities, highly vulnerable or exposed to abuse must be in language and media appropriate and understandable to those individuals.</p>
3	<p>Prevention</p> <p>Safer Programming means all representatives of SCI must pay attention to how we work as well as what we do the potential impact of our presence, and the ways in which we design and implement programmes. Any poor safeguarding practice must be escalated, reported, responded to and corrected. Failure to do so may result in disciplinary action</p> <p>SCI’s commitment to Zero Tolerance of sexual exploitation and abuse means all programme design and planning must include a gender power analysis, which also looks at the roles and structure of SCI staff, volunteers, interns and partners and a safeguarding risk assessment. This analysis must also include recognition of the intersections of gender with other vulnerabilities (e.g. disability, age, and so on), and programme design and staffing must reflect these assessments in line with the organisation-wide commitment that all programmes are gender sensitive at a minimum.</p> <p>We commit to Do No Harm through ensuring all areas of SCI’s work are designed and resourced appropriately to minimise the opportunities for perpetrators to act</p>

	exploitatively and to maximise the safety of those engaging with our programming and otherwise involved with SCI.
4	<p>Reporting</p> <p>There are two main ways that allegations or concerns may come to the attention of an organisation;</p> <ol style="list-style-type: none"> 1) Directly by a survivor themselves, or by someone close to them, such as a family member or member of the community. A direct report of a concern or incident may also come from SCI staff or representative, staff in another organisation who have heard about it in their services, or from a staff member or volunteer who has witnessed it. 2) Indirectly through information collected from different sources and analysis, including research, focus group discussions, studies, and through the collection of reported concerns, leading to identifiable patterns of potential abuse. <p><i>Any adult safeguarding concerns must be reported through one of the official SCI reporting channels. Report</i></p> <ul style="list-style-type: none"> • through the CO HR Director, or Regional HR Director; • through the Country Director; • through the Chief People Officer or other senior leader at the location; or • through the Whistleblowing System. <p>Any information relating to a suspicion of SEA must be treated with utmost confidentiality and not be shared with any third party other than those identified as part of the defined reporting channels.</p> <p>Country Offices must have a PSEA Focal Point at the country level and all field sites, who is responsible for driving awareness of the policy and on how to report, inviting, receiving and collating all causes for concern. When these collected pieces of information generate a picture of a site, or a programme, or a particular person, the PSEA Focal Point must escalate the matter to trigger further inquiry and/ or investigation.</p> <p>The PSEA Focal Point must develop relationships and networks with international, national and local organisations so that those organisations know who in SCI to report SEA concerns.</p> <p>SCI has a responsibility to report incidents of PSEA to the UK Charity Commission and to keep Members fully informed and promptly updated on any suspicion of SEA relating to any of their projects implemented by SCI or its partners. Charity Commission reports are the responsibility of the legal team at the Centre and the regional safeguarding directors.</p>
5	<p>Response</p> <p>Investigations:</p> <p>The investigation must be instigated by senior management in the country team, with the support and involvement of HR and the Regional HR Directors. If the causes for concern involve senior management in the country programme, support and investigation must be sought from the Regional HR Director.</p>

Investigations are not always contingent on direct allegations from a particular survivor, but can be triggered by there being enough causes for concern from enough different sources to feel that there is likely to be a problem. **It is the organisational responsibility to actively seek further information and to investigate all issues raised.**

Investigations must be confidential, in accordance with the Data Protection Policy, and the Grievance/Disciplinary Policy, and designed to prevent gossip, rumour spreading and destruction of reputations and relationships, where possible.

SCI is committed to ensuring a fair process for those under investigation and confidentiality for all parties. **Breach of confidentiality in investigations and /or** any attempt at intimidation, victimization or retaliation towards a complainant, witnesses or any other party involved in an investigation **may be treated as gross misconduct.**

SCI recognises the high risk to survivors and others in reporting, including a strong likelihood of threats and/or retaliation. As such, **safety planning and safety management must be the core of a survivor-centred approach to response.** SCI also recognises that responses are closely watched by beneficiaries and communities, taken as indications of how safe an organisation is, which can influence further reporting and the overall trust the organisation is awarded by the community. **SCI is committed to running thorough inquiries and/or investigations of any and all allegations of abuse and exploitation.**

Country offices must also have a designated Survivor Liaison-Advocate, who is responsible for case management with survivors. Survivor Liaison-Advocates provide a consistent point of information with survivors, make appropriate referrals, and support survivors to have access to support services and safety planning.

PSEA Focal Points and Survivor Liaison-Advocates must report to and be supported by HR and SEA positions at the regional level, as well as Country Directors, to maintain organisation-wide standards, provide support, and enable investigations where allegations relate to CO management.

Both the PSEA Focal Point and the Survivor Liaison-Advocate must be trained on Sexual and Gender Based Violence (SGBV) Guiding Principles, including the survivor-centred approach and must have access to GBV Standard Operating Procedures (SOPs) which include the referral pathways to enable the survivor to access the necessary services. In recognition of best practice, survivors should be offered the choice of being supported by men or women Focal Points and Survivor Liaison-Advocates.

SCI will ensure that survivors are supported into appropriate services, including health, legal, psychosocial and economic services, where possible. These services may be within SCI programmes, or outside if the required services are not available within SCI programmes or if there are concerns around confidentiality and/or safety.

This policy will be implemented in accordance with;

- All relevant UK laws related to protection from sexual abuse, violence and harm, and those outlining measures for reporting known or alleged cases of abuse;
- Applicable laws in the countries where SCI operates; and

	<ul style="list-style-type: none"> • The UN Secretary General’s Bulletin ‘<i>Special Measures for Protection from Sexual Exploitation and Sexual Abuse</i>’ (ST/SBGB/2003/13). <p>SCI will report criminal behaviour to relevant authorities, except where doing so will create additional harm for a survivor or there is another justifiable risk in reporting. In these instances, the reasons for not reporting must be documented, approved by the Country Director and authorised by the Chief People Officer. Where there are international protocols around the reporting of perpetrators within their home countries or abroad, SCI will report appropriately.</p> <p>Those under investigation will be invited and encouraged to participate in the ongoing investigation. In the event they decline, resign or do not make themselves available to the investigation team, the investigation must proceed to completion regardless. The required follow-up action and decision on the outcome of the investigation will be taken by SCI senior management at the Country, Regional and or Centre level.</p> <p>It is important to note that when a formal complaint to statutory systems has been made, that this does not preclude an internal investigation by SCI. Breaches of the Code of Conduct, Child Safeguarding Policy, Global Anti-Harassment Policy, and PSEA Policy may be gross misconduct and grounds for termination of contracts and agreements.</p> <p>SCI is committed to taking all appropriate corrective actions, including disciplinary, legal or other actions, in light of any findings of sexual exploitation and abuse with respect to relevant individuals (including those who have committed acts of SEA or anyone who knew of such incidents and failed to act). <i>SCI will take steps following any incidents of SEA to review controls and protocols to identify and address any gaps or weaknesses.</i></p>
6	<p>Representation</p> <p>No identifying information – names, images, geographical location and so on – of survivors can be used in any communications, publicity, or fundraising materials. This includes information that may support the identification of a survivor through multiple small pieces of information. Consent to use a survivor’s words or story must not be confused with consent to use any aspect of their identity.</p>

SECTION 3: DEFINITIONS

Word/Term	Definition
PSEA	Protection from Sexual Exploitation and Abuse. Terms defined separately below.
Survivor	A person who has experienced, or is still experiencing sexual exploitation and abuse in relation to their involvement with SCI or in any other agency organisation.
Representative	Those associated with SCI, but not directly employed by SCI; this includes partners, agency workers, consultants, volunteers, Trustees, donors on visits to SCI programmes, contractors, suppliers and trainees.

<i>Beneficiary of direct or indirect assistance</i>	Any person who receives any assistance (including all types of goods, services, opportunities, training) directly or indirectly (as the parent or caregiver of children involved in SCI programmes and activities) or partner NGO, regardless of the length of time of their relationship with SCI.
<i>Communities in which we work</i>	Any geography in which SCI directly or indirectly operates, providing goods, services or other kinds of assistance.
<i>Contextual Safeguarding</i>	The process through which assessments analyse the factors that may create an enabling environment for the perpetration of sexual exploitation and abuse, including the characteristics and relative power of the people involved, and make recommendations to reduce these opportunities and promote safety for the most vulnerable and exposed.
<i>Gender Power Analysis</i>	Gender power analysis is an assessment that takes into consideration the inequalities of gender in communities and beneficiary groups, as well as with SCI staff, volunteers and representatives, and recognises the ways in which these contribute to inequalities and vulnerability.
<i>Sexual Harassment</i>	Any unwanted and/or uninvited conduct of a sexual or sexualised nature, which has the purpose or effect of violating an individual's dignity, or creating an intimidating, hostile, degrading, humiliating, or offensive environment for that individual. This conduct may or may not be criminal, and it may or may not be direct physical touching.
<i>Sexual Abuse</i>	The threatened or actual physical intrusion of a sexual or sexualised nature, including inappropriate touching, by force or under unequal or coercive conditions, sexual assault and rape. It may also include threatened or actual non-physical intrusion (unwanted and/or uninvited exposure to pornography, texts, images, and so on, the sharing of images, texts and so on, demands for sexualised photographs etc.).
<i>Grooming</i>	The cultivation of emotional relationships with those in positions of vulnerability or inequitable power, with the intention or potential of manipulating these relationships into sexualised dynamics in the future
<i>Sexual Exploitation</i>	Any actual or attempted abuse of a position of vulnerability, differential power, trust, or dependency, for sexual or sexualised purposes. This includes the offer or promise of monetary, social, political benefits as an incentive or form of coercion.
<i>Sexual Favours</i>	Any sexual or sexualised acts, in exchange for something such as money, goods, services, opportunities and so on. Also includes demands for inappropriate photographs, filming, and exposure to pornography and so on.
<i>Subject of Concern</i>	The person/s against whom a complaint has been received i.e. The person who has allegedly committed the act or failed to act in a way that protects children.
<i>Sex Worker</i>	Any person over 18 years of age who receives money, goods or services in exchange for sexual or sexualised acts, and who define those activities as income-generating, even if they do not identify as sex workers or as exploited.
<i>Consent</i>	Informed consent is an ongoing agreement which is freely given based upon a clear appreciation and understanding of the facts, implications and future consequences of an action. In order to give informed consent, the individual concerned must have all relevant facts at the time consent is given and be able to evaluate and understand the consequences of an action. They also must be aware of and have the

	power to exercise their right to refuse to engage in an action without justification and/or to not be coerced (i.e. being persuaded based on force, coercion or threats, either direct or implied).
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SECTION 4: RELATED DOCUMENTS

1	SCI Code of Conduct
2	SCI Child Safeguarding Policy
3	UN Convention on the Rights of the Child UN Declaration of Human Rights UN Secretary-General's Bulletin on the Prevention of Sexual Exploitation and Abuse
4	SCI Anti-Harassment Policy
5	SCI Whistleblowing Policy
6	SCI Child Safeguarding in Humanitarian Procedure
7	SCI Child Safeguarding Investigation Procedure
8	SCI Incident Reporting Procedure
9	SCI Disciplinary Policy
10	SCI Safer Programming Procedure and Guidelines
15	SCI Social Media Policy
16	SCI Data Protection Policy