



Protection against sexual exploitation and abuse (PSEA) Policy

Policy Area: Protection Against Sexual Exploitation and Abuse (PSEA) Policy

Policy Number: CFI-PSEA

Title of Policy: Protection Against Sexual Exploitation and Abuse (PSEA) Policy

Approved Date:

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Purpose

These PSEA Guidelines complement the Children's Future International (CFI) Child Protection Policy and emphasize special measures for the protection from sexual exploitation and sexual abuse.

This document aims at providing guidelines and procedures to prevent and address sexual exploitation and abuse and sexual harassment. It presents our principles and commitments to prevent and respond to SEA.

The standards below apply to all Staff, Board Members, Long-term and Short-term Volunteers, Consultants and Contractors, Visitors, Parents, NGO partners and ChildSafe Agents, at all times, on or off duty.

Definition

Sexual exploitation and abuse (SEA) is a potentially life threatening protection, health, and human rights issue that can have a devastating impact on women and children in particular, and families and community recipients of assistance. SEA can also damage the reputation of an institution and violate applicable international law standards and norms universally

- **Sexual abuse:** the inducement or coercion of a child to take part in sexual activities that he or she does not fully understand and has little choice in consenting to. Sexual abuse also consists of any sexual activity with a person under the age of 18: a child cannot legally give informed consent. It also includes involving children in looking at or producing sexual images, watching sexual activities and encouraging children to behave in sexually inappropriate ways.
- **Sexual exploitation:** a form of sexual abuse that involves children 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 Harassment:** includes all conduct of a sexual or gender-determined nature at the workplace or connected to the workplace that is intended to violate the dignity of a person, or which has this effect.

Principles

1.CFI has a Zero tolerance of any abuse including SEA of a child, service users and / or staff. In any abuse or SEA situation, concerns will be taken seriously and will result in action

2. Sexual exploitation and sexual abuse constitute acts of serious misconduct and are therefore grounds for disciplinary measures (i.e termination of contract)
3. Sexual activity with service users is prohibited regardless of age of majority or age of consent locally
4. Exchange of money, employment, goods, and services for sex is prohibited
5. Suspicion/concern of sexual exploitation must be reported
6. CFI maintains an environment that prevents sexual exploitation and abuse and promotes the core principles to ensure that. *Harassment free environment* is available in *ANNEX 1* of this policy

Prevention of SEA

CFI takes all appropriate measures to prevent SEA through various policies, messages disseminated in all training. To prevent any forms of SEA, CFI ensures that:

- Safe recruitment is in place : as defined in the Child Protection (CPP) and Recruitment Policies
- Safe partnerships are developed: partners are required to respect CFI's Child Protection Policy. CFI raises awareness amongst citizen, volunteers, tourists and business about good practice in terms of CPP and PSEA
- All staff are informed and trained on the policies, including reporting procedures and Code of Conduct policy.
- All staff have signed and acknowledged that they have read and understood the policy
- Staff are obliged to create and maintain an environment that prevents sexual exploitation and sexual abuse. Managers at all levels have a particular responsibility to support and develop systems that maintain this environment.

Reporting of allegations

All are expected to report SEA situations: It is the duty and responsibility of all staff and associates, to report allegations of SEA to relevant CFI staff (as outlined in Annex 2). The report needs to be done immediately and must respect confidentiality principles.

Communities, people who use CFI services and all personnel are informed about how to report. Communication is adapted to the target audience.

There are different channels and tools for someone to report: ChildSafe Hotlines, CPOs and HR for cases of harassment happening in the workplace. A format for the report is available in the CPP Abuse report form

CFI also have a Whistle blower policy and related 7 tips. The WHISTLE BLOWER 7 tips are in ANNEX 2 of this document.

CFI encourages staff members to report concerns or suspicions of misconduct by colleagues.

CFI is aware of the potential dangers/risks to all parties and it incorporates ways to prevent harm by ensuring confidentiality, offering physical protection and addressing potential retaliation (including a safe place).

Reporting is available in Annex 4 of this Policy

Investigation of allegations

CFI is committed to investigate properly and without delay allegations of SEA. Trained Child Protection Officers (CPOs) who have extended experience on safeguarding and dealing with situations of abuse will coordinate investigations of allegations.

Information about investigation process is available in Annex 4 of this Policy

Support and referrals for immediate assistance

If specific assistance is necessary, CFI will refer the case to the relevant services (medical, psychosocial). A list *Referral agencies for SEA cases Directory* is available in ANNEX 3.

Harassment free environment Policy

CFI requires all employees to be mindful of the organization's neutrality with respect to political and/ or religious beliefs allowing us to work together in the best interest of children, without bias. Likewise, CFI is committed to creating a working environment in which everyone is treated with respect and dignity, irrespective of nationality, color, sex, creed, birth and social origin, beliefs, membership of worker unions or exercise of union activities, cultural or language differences.

CFI aims to foster positive workplace environments, free from unlawful discrimination, harassment, bullying, disrespectful behaviors, violence, and maintain a workplace conducive for employees to reach their full potential; personally, and professionally, in contributing to the CFI's vision, mission and objectives.

CFI does not tolerate any type of harassment. Harassment is defined as, but not limited to, any unwanted, unwelcome, uninvited behavior that may or may not be based on a person's:

- Race
- Color
- Gender identity
- Religion
- National / ethnic origin
- Sexual Orientation
- Age
- Physical / Mental Disability
- Appearance

Harassing behavior may include, but is not limited to, derogatory comments, offensive jokes, slurs, name-calling, assaults or threats, impeding or blocking movement, intimidation, ridicule, insults, derogatory/ offensive pictures, sabotaging colleagues' work, initiating and spreading malicious rumors or lies, microaggression and more. While harassment may consist of repeated acts, a single serious incident that has a lasting harmful effect also constitutes harassment.

CFI has a zero tolerance policy to any kind of sexual harassment, defined as unwelcome sexual advances, requests for sexual favors, or other verbal or physical contact of a sexual nature when such conduct creates an offensive, hostile and intimidating working environment.

Sexual Harassment includes, but not limited to:

- Requests to perform sexual activities
- Gestures and other nonverbal communication with sexual suggestions
- Physical approaches/physical contact of a sexual nature/sexual assault
- Comments of a sexual nature about someone and/or their body or sexual identity
- Sexually discriminatory language and humiliating remarks, including sexually explicit jokes;
- Showing or displaying pornographic or sexist images
- Repetitive questions into an individual's relationship details

Non-exhaustive examples of inappropriate and unacceptable behavior include:

- using a harsh tone of voice (such as yelling or berating others)
- making lewd gestures or remarks
- talking down to others, using a patronizing or condescending tone
- any malicious behavior a reasonable person would find unprofessional, disturbing and harmful to their psychological health
- any unwanted or undesirable conduct that shows hostility or an aversion towards another person, with the intention of making them uncomfortable.

CFI encourages positive and healthy behaviors such as:

- Interacting in a respectful, courteous, supportive, and encouraging manner
- Listening to colleagues' positions with an open mind
- Expressing appreciation after successful teamwork
- Approaching conflict with maturity and a desire for resolution
- Maintaining professionalism at all times.

7 TIPS FOR WHISTLE-BLOWERS

A 'whistle-blower' is someone who exposes any kind of information or activity that is illegal / unethical / against organisation policies (e.g. fraud, corruption, abuse, PSEA etc)

1. SPEAK WITHOUT FEAR

- CFI will ensure whistle-blowers are protected and not mistreated, if disclosures comply with policy and are in good faith, even if allegations are found to be untrue
- Any information given will be treated with the maximum confidentiality possible. If the whistle-blower requests anonymity, it will be respected.

2. DISCLOSE TO AN APPROPRIATE PERSON

- Procedures in place so that staff complaints are dealt with professionally; not aired outside of CFI or as a topic of scandal within CFI creating a toxic environment, or creating irreparable damage to someone's reputation, before they have a chance to be investigated.
- 'Appropriate person' may include; line managers, Executive Directors, Board of Directors, or a Child Protection Officer for suspected child abuse.
- Whistle-blowers have the right to bypass their own manager if the allegation is against them and go to the next manager in line, or directly to the President of the Board.

3. KNOW THE PROCESS

- Appropriate investigating officer(s) are assigned who will document; 1) full details of the complaint, 2) all their investigation procedures, 3) Evidence of their findings and 4) final report on their findings. This will be presented to the appropriate management (depending on who is being investigated).
- In some more serious instances, it is necessary to suspend the staff member that is being investigated, during these procedures.

4. TRY NOT TO REMAIN ANONYMOUS

- During investigation, questions need to be asked. By sending anonymous disclosures, investigations become more problematic.
- Anonymous allegations are generally less reliable (e.g. the spreading of malicious rumours in group emails or Facebook group to damage a colleague's reputation).

5. UNDERSTAND THE POTENTIAL CONSEQUENCE

- Where allegations are found to be true, persons in management may invoke disciplinary procedures, or termination of employment, or where criminal activity has taken place; filing a police report
- Where allegations are unfounded, no further action will take place, against both the whistle-blower who reported in good faith, and the person being investigated

HAVE KNOWLEDGE OF THIS POLICY

- Ensure that colleagues, current and new, are aware of this policy.
- If someone talks to you about a suspicion, advise them of this policy
- If you hear rumours, remind people of this policy and the appropriate steps to take, and minimize office gossip which can damage a person's reputation if unfounded.

REMEMBER; CFI HAS A ZERO-TOLERANCE POLICY ON OF ANY ABUSE INCLUDING SEA & CORRUPTION

- CFI is committed to high standards of openness, transparency and accountability.
- Take time to familiarize yourself with CFI Regulations, Policies and Standards of



Harassment Report Form

If you have knowledge or suspect any disrespectful situation during work, this includes sexual harassment, any form of discrimination, sexism and threatening or disrespectful behavior. Please complete this form to the best of your knowledge. Then share with the designated **Human Resources Officer**.

ABOUT YOU <u>ព័ត៌មានអំពីអ្នក</u>	
<i>Your name</i>	
<i>Your job title</i>	
<i>Workplace</i>	
<i>Contact details (phone number and Email)</i>	
ABOUT THE ALLEGED PERPETRATOR	
<i>Name of the Alleged perpetrator</i>	
<i>His/her job title</i>	
<i>Relationship of the Accused to the Complainant (manager, co-worker, client, etc)</i>	
<i>Contact details (phone number and Email)</i>	

ABOUT THE INCIDENT

How did you know about the incident?

- Direct observation
- Suspicion
- Disclosure of the person(s) involved
- Disclosure of another person(s). Name(s).....
- Other, please explain

.....

.....
.....

Date and time of the alleged incident OR period of the alleged accident:

(If more than one event, please report each event on a separate form.)

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.....
.....

Location of the alleged incident:

.....
.....
.....

Nature of the allegation (If applicable, state exactly what the person involved or another source said to you and how did you react to the situation. Did you take any action to stop perceived inappropriate behavior?):

Were there any witnesses to this specific event? (If yes, please provide their names)

.....
.....
.....
.....

ANY OTHER PERSONS INFORMED

.....
.....
.....
.....

The information provided in this complaint is true and correct to the best of my knowledge. I am willing to cooperate fully in the investigation of my complaint and provide whatever evidence Children’s Future International deems relevant.

Date://

Signature:

Annex 3



Referral agencies for SEA cases Directory

Identification/Investigation:

Organization	Services Offered	Contact
CPOs	<ul style="list-style-type: none"> ● Point of contact ● Investigation ● Reporting ● Flow chart ● Follow up 	Per organization Children’s Future International Hor Sokhors Technical Director sokhors@childrensfurue.org Telephone: +855 097 75 777 20 Chhay Yary Senior Social Worker yary@childrensfuture.org Telephone: +855 066 554 374 Phen Sunthea Senior Social Worker sonthea@childrensfuture.org Telephone: +855 097 251 56 56
APLE	<ul style="list-style-type: none"> ● Investigation- online and in person ● Police support ● Ensuring apprehension of perpetrator 	Seila SAMLEANG Executive Director APLE Cambodia Address: Phnom Penh, Cambodia Email: director@aplecambodia.org Skype: Seila.Samleang Telephone: +855 (0)23 996 351 Cell: +855 (0)17 777 669

Response:

Organization	Services Offered	Contact
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Transcultural Psychosocial Organization (TPO)	<ul style="list-style-type: none"> ● Counseling 	Mr Lao Lun (លោក លុន) Provincial Coordinator (TPO) Telephone: +855 12 819 789 tpobtb@tpocambodia.org
Angkor Hospital for Children	<ul style="list-style-type: none"> ● Medical support and social support/referral 	Dim Sophearin Head of Social Work Unit sophearin@angkorhospital.org
First Step	<ul style="list-style-type: none"> ● Counselling and therapeutic services for victims of sexual abuse ● Building a safe and supportive home environment by increasing the knowledge, involvement, and capacity of the child's family and supporters ● Holistic approach, providing practical support to the children and their family 	Sarath Youn , Program Manager, : Sarath@first-step-cambodia.org phone – 017 292 001
Banteay Srei Battambang Organization	<ul style="list-style-type: none"> ● Safe shelter ● Physical and psychological healing ● Legal assistance ● VT and employment ● Reintegration 	Man Shema Provincial Coordinator (BS) Telephone: +855 99 649 854 E-mail: pvc.bb@banteaysrei.info
Legal Aid Cambodia (LAC)	<ul style="list-style-type: none"> ● Free legal service 	Phone: 088 7777 093 , 012 385 155. E-mail: lacadmin@lac.org.kh website: http://www.lac.org.kh
M'lup Russey Battambang	<ul style="list-style-type: none"> ● Emergency Shelter ● Family base alternative care program 	Fay Savin Social Worker Telephone: +855 40 80 545 E-mail: savin.sw@mluprussey.org



Reporting and investigation

If you have been the victim of a violent incident either within or outside the workplace, CFI requests that you, or someone you trust to assist you, completes Section A of this report form. This report will enable CFI to provide you the support and protection you need, as well as take necessary and feasible steps to prevent such incidents occurring again in order to protect CFI employees. Section B will be completed by a member of management, and the compulsory check list in Section C will be completed by HR. All Violence Incident Reports will be kept CONFIDENTIAL by HR, and relevant management. Victims will be informed and consulted with regards to who has been made aware of incidents.

SECTION A

TO BE COMPLETED BY VICTIM / NOMINEE ON BEHALF OF VICTIM

Victim Details	
Report Date	
Name	Male <input type="checkbox"/> Female <input type="checkbox"/>
Job Title	
Office/Program	
Years in job	

Incident Description	
Date incident occurred	
Time incident occurred	
Please describe what happened during the incident, ideally in chronological order.	
Location where incident occurred (please be specific)	

Were there any witnesses to the incident? Please provide name(s), contact details, if available.

Are there any other people involved that should be mentioned? Please provide name(s), contact details, if available.

What type of weapon was used, if any? How was the weapon obtained by the perpetrator

If on CFI premises, were security personnel on duty at the time of the assault? If yes, was security notified? Did security respond? When? Were there any other reactions from other witnesses?

Who threatened or assaulted you/ the victim? (tick all that apply)

- | | | |
|---|--|---|
| <input type="checkbox"/> Child | <input type="checkbox"/> Co-worker | <input type="checkbox"/> Client/Customer |
| <input type="checkbox"/> Student | <input type="checkbox"/> Supervisor/Manager | <input type="checkbox"/> Robber/Burglar |
| <input type="checkbox"/> Caregiver | <input type="checkbox"/> Spouse/Partner | <input type="checkbox"/> Animal |
| <input type="checkbox"/> Other Beneficiary | <input type="checkbox"/> Former spouse/partner | <input type="checkbox"/> Other (please specify) |
| <input type="checkbox"/> Family/Friend of Beneficiary | <input type="checkbox"/> Stranger | <div style="border: 1px solid black; height: 30px; width: 100%;"></div> |

Were any threats made before the incident occurred? If yes, did you/ the victim ever report to a supervisor or manager that you /the victim were being threatened, harassed or suspicious that the attacker may become violent?

Were you/ the victim injured? Please specify injuries and location of any treatment

Information on Assailant/ Perpetrator (Name/Address/Age/ Sex and other information, if known)

Were you / the victim singled out or was the violence directed at more than one individual. If other victims, please provide names

Any other key information that should be mentioned?

Would you/the victim like support to lodge a police report?

The following support can be provided to you/ the victim. Please state what kind of support you/ the victim would like to receive

Time off from work

Medical attention

Counselling

Support point-of-contact at CFI

Claim on Accident
Compensation, if covered

Other (please specify)

Report Completed By	
Department/Job Title	
Date	
Signature	

SECTION B

TO BE COMPLETED BY MANAGEMENT

Incident Analysis	
Has this type of incident occurred before in the work place?	Yes <input type="checkbox"/> No <input type="checkbox"/>
What do you think were the main factors that contributed to the incident?	
<div style="border: 1px solid black; height: 40px;"></div>	
What do you feel can be done in the future to prevent, avoid or minimize the damage to employees caused by such an incident?	
<div style="border: 1px solid black; height: 40px;"></div>	
Type of Incident (tick all that apply) (please see 'Glossary on last page)	
<input type="checkbox"/> Verbal abuse/threat <input type="checkbox"/> Physical Attack <input type="checkbox"/> Robbery <input type="checkbox"/> Anti-Social Behaviour <input type="checkbox"/> Near Miss <input type="checkbox"/> Other (please specify)	
<div style="border: 1px solid black; height: 20px; width: 100%;"></div>	

Post Incident Response & Checklist (provide additional information in space provided)	
To whom was the incident reported?	
<div style="border: 1px solid black; height: 40px;"></div>	
Did the victim require medical attention as a result of the incident?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<div style="border: 1px solid black; height: 40px;"></div>	
Has medical attention been offered immediately?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<div style="border: 1px solid black; height: 40px;"></div>	
Has medical attention been accepted by victim and facilitated by CFI?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<div style="border: 1px solid black; height: 40px;"></div>	
In case of sexual assault or rape, did victim access: 1) A rape kit / exam 2) Post-Exposure Prophylaxis (PEP) 3) Other preventive treatment <i>(Please see glossary for definitions)</i>	1) Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 2) Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	3) Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Was victim offered sufficient time off from work? How long?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Did the victim take time off work? How long?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Is the victim at any continued risk in the workplace? Further action proposed:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Was the victim supported to apply for accident compensation, if covered?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Was a police report filed? When, where and what was the outcome?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Was critical incident debriefing provided (allowing victim to process/talk about the incident within 72 hours of it taking place), in order to help deal with or minimise trauma (if any).	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Has the victim been assigned support personnel to check-in with them at frequent and regular intervals? Who? For how long?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Was immediate counselling provided to affected workers and witnesses who desired it?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Was post-trauma (follow-up) counselling provided to all affected staff who desired it?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

Was the counselling effective?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Should counselling be continued?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Was the victim advised about legal rights?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Does victim understand that the incident will have to be reported internally to relevant management? Has victim been informed of who will be informed?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Result of Incident	
<input type="checkbox"/> No action taken <input type="checkbox"/> Arrest <input type="checkbox"/> Warning <input type="checkbox"/> Suspension <input type="checkbox"/> Immediate termination <input type="checkbox"/> Other (please specify)	
<input style="width: 150px; height: 25px;" type="text"/>	
Did the victim return to the workplace, or consider resignation as a result of the incident?	
Please list here and attach any supporting documents to support this report (e.g. doctor's certificate, police reports, etc.)	

Report Completed By	
Department/Job Title	

Date	
Signature	

SECTION C

TO BE COMPLETED BY HR

Further follow up / Compulsory Response checklist			
Have all relevant management been informed? Who?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
RESPONSIBLE PERSON: RESPONSE DATE:			
Is further investigation required? (e.g. where perpetrator is not a stranger)	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
RESPONSIBLE PERSON: RESPONSE DATE:			
If not already, will a police report be filed? If no report will be filed, why?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
RESPONSIBLE PERSON: RESPONSE DATE:			
Can further care be provided to victim if required? What type of care?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
RESPONSIBLE PERSON: RESPONSE DATE:			
Is further time-off recommended for victim? How long?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
RESPONSIBLE PERSON: RESPONSE DATE:			
Is victim entitled to workplace compensation/ being supported to make a claim?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
RESPONSIBLE PERSON: RESPONSE DATE:			
Should or has next-of-kin been informed with victim's permission?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Who has been appointed as the victim's point-of-contact post-incident? How frequently are they required to check-in with the victim?			

