



PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE POLICY (PSEA)

September 2020

INDEX

ORGANISATION’S PSEA PRINCIPLES AND COMMITMENTS	4
POLICY STATEMENT	4
SCOPE	5
DEFINITIONS	5
ORGANIZATION’S PSEA PRINCIPLES	6
ROLES AND RESPONSABILITIES	7
PROCEDURES AND RESPONSES	8
REPORTING PROCEDURES	8
INVESTIGATION	9
CONFIDENTIALITY AND DATA PROTECTION	10
PROTECTION AGAINST RETALIATION	10
SAFE RECRUITMENT	10
TRAINING	11
PARTNERS AND CONTRACTORS	11
SAFE PROGRAMMING	11
REVIEW OF THE POLICY	12

ANNEX

- Examples of conduct or behavior which constitute harassment or sexual harassment
- Declaration of agreement to be bound by uphold the ACRA PSEA Policy for partners
- Declaration of Agreement to be Bound by and Uphold the ACRA PSEA Policy and the ACRA Child Protection and Safeguarding Policy for Personnel
- Incident report for reporting SEA allegations
- Report on investigations and actions taken for SEA incident
- Annual report on SEA complaints
- Terms of reference Country PSEA Focal Point
- Terms of reference HQ PSEA Focal Point
- Terms of reference PSEA Policy Steering Committee
- Abstract of ACRA PSEA Policy

BIBLIOGRAPHY

UNFPA Prohibition of Harassment, Sexual Harassment, Abuse of Authority and Discrimination, December 2018

UNICEF Protection from Sexual Exploitation and Abuse (PSEA): A Practical Guide and Toolkit for UNICEF and Partners, April 2020 https://www.unicef.org/about/partnerships/index_81428.html

United Nations Glossary on Sexual Exploitation and Abuse, July 2017

(https://hr.un.org/sites/hr.un.org/files/SEA%20Glossary%20%20%5BSecond%20Edition%20-%202017%5D%20-%20English_0.pdf)

United Nations UN System Model Policy on Sexual Harassment, December 2018

(https://unsceb.org/sites/default/files/UN%20System%20Model%20Policy%20on%20Sexual%20Harassment_FINAL.pdf)

World Food Program Protection from Harassment, Sexual Harassment, Abuse of authority and Discrimination, March 2018 (https://docs.wfp.org/api/documents/WFP-0000073615/download/?_ga=2.226483164.795415947.1599734524-680786357.1599734524)

INTERSOS Protection from Sexual Exploitation and Abuse Policy, September 2017 (https://www.intersos.org/wp-content/uploads/2018/08/Sexual-Exploitation_English_Final_Online.pdf)

Oxfam One Oxfam Policy on Protection from Sexual Exploitation and Abuse (PSEA), Last updated on December 2018, Review date on June 2019 (https://www-cdn.oxfam.org/s3fs-public/one_oxfam_psea_policy_en.pdf)

Save the Children Save the Children's Protection from Sexual Exploitation and Abuse (PSEA) policy, August 2019 (https://www.savethechildren.net/sites/www.savethechildren.net/files/SCI_HR_POL_PSEA%20External%20policy_EN.docx.pdf)

Inter-Agency Standing Committee (IASC) - Preventing Transgressors Moving Through The Humanitarian System (2018) (https://interagencystandingcommittee.org/system/files/session_1-psea-sha-preventing_transgressors_moving_through_the_sector-31_may_2018-principals_meeting.pdf)

Inter-Agency Standing Committee (IASC) - Learning Package on Protection from Sexual Misconduct for UN partner organizations

(<https://interagencystandingcommittee.org/iasc-learning-package-protection-sexual-misconduct-un-partner-organizations>)

ACKNOWLEDGEMENTS

Planning, coordination and drafting of text: Elena Scanferla

Contributions by: Silvia Ciacci, Sara Marazzini, Silvia Fregoso, Emanuela Bandettini, Laura Fornara, Karen Enríquez, Elina Haincaud

Translations: Karen Enríquez (Spanish), Elina Haincaud (French), Laura Fornara (English and Italian)

Graphic design and layout: Laura Fornara

Photos: Nadine Shaabana from Unsplash.com



ORGANIZATION'S PSEA PRINCIPLES AND COMMITMENTS

POLICY STATEMENT

ACRA is committed to providing a safe environment for all persons, who have the right to live their lives free from any form of discrimination, sexual violence and abuse in the workplace.

ACRA employees, volunteers, providers and partners also have a corresponding responsibility to actively promote such an environment.

ACRA has a zero-tolerance policy towards sexual harassment, exploitation, and abuse in the workplace. All complaints of sexual harassment will be taken seriously and treated with respect and confidentiality. No one will be victimised for making such a complaint. All allegations of sexual harassment will be promptly investigated. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal.

ACRA commits to supporting survivors, improving safeguarding capacity, reporting, investigating, responding to, and preventing sexual harassment and sexual exploitation and abuse.

SCOPE

This policy applies to all persons working for ACRA or on our behalf in any capacity, including ACRA staff all levels in ACRA HQ and ACRA country offices, board members, volunteers and interns. It also applies to contractors, external consultants, day laborers, individual and corporate suppliers and their related personnel which will have a direct contact with beneficiaries. It applies to entities and their employees who have entered into a partnership with ACRA, sponsors and testimonials of ACRA's campaigns.

It applies during or outside of working hours, every day of the year. Except in countries where the following policy contravenes local legislation, in these cases, local legislation should be followed with guidance from the PSEA Focal Point. ACRA policy will apply in the event that it is more stringent than local legislation.

The policy will be reviewed periodically (advisably if possible, every 24 months) taking into account lessons learned from policy implementation and ongoing monitoring, changes in the organisation, and complementary policies.

DEFINITIONS & ACRONYMS

ACRA staff and related personnel (also referred to as "ACRA employee"): any person employed by ACRA in ACRA HQ and ACRA Country Offices, including international professional staff members, locally recruited staff members, short term personnel, volunteers, and interns. For the purpose of this policy, it also includes any other person working with ACRA or visiting the workplace, such as contract workers, personnel of ACRA vendors and cooperating partners, suppliers, etc.

Alleged offender: the person against whom allegations of abusive conduct are made.

Victim/Affected individual: the person or persons in the workplace or connection with work, against whom the abusive conduct has allegedly taken place.

Complainant: the person reporting (or "making a complaint") about SEA. This could be the victim/affected individual or another person who becomes aware of the wrongdoing.

Sexual abuse: the actual or threatened physical intrusion of a sexual or sexualized nature, whether by force or under unequal or coercive conditions, sexual assault or 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.).

Sexual exploitation: any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual

exploitation of another. Sexual exploitation is a broad term that includes several acts such as transactional sex, solicitation of transactional sex" and "exploitative relationship".

Sexual harassment: any unwelcome conduct of a sexual nature which makes a person feel offended, humiliated, and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations, which create a hostile, intimidating, or humiliating environment for the recipient.

Workplace: includes any ACRA facility and any place where ACRA staff and related personnel are present during their official duties.

Zero tolerance policy: ACRA policy establishing that sexual harassment and abuse by ACRA staff and related personnel is prohibited and that every single concern will be fully responded to and prompt actions taken.

SEA: sexual exploitation and abuse.

PSEA: protection against sexual exploitation and abuse.

PSEA Focal Point: the person designated to receive complaints and reports about alleged acts of SEA involving ACRA staff and personnel.

HQ: Head Quarters.

HR: Human Resources.

The mere expression of disagreement, admonishment, criticism, or similar expressions regarding work performance, conduct, or related issues within a supervisory relationship shall not normally be considered harassment, discrimination, or abuse of authority within the meaning of this policy.

ORGANIZATION'S PSEA PRINCIPLES

ACRA is committed to promoting a working environment free of sexual harassment in which all people are treated with respect, through the following principles and means:

- **Sexual exploitation and abuse** by ACRA staff and related personnel constitute acts of gross misconduct and are, therefore, grounds for termination of employment or contract/agreement. Sexual harassment by ACRA staff and related personnel is grounds for disciplinary action up to and including dismissal.
- **Sexual activity with children (persons under the age of 18) is prohibited** regardless of the age of the majority or age of consent locally. Mistaken belief in the age of the child is not a defence.
- **Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading, or exploitative behaviour by ACRA staff and related personnel is prohibited at all times.** This includes buying sex or the exchange of assistance that is due to programme participants.
- **Sexual relationships between ACRA staff and related personnel and beneficiaries are forbidden.** Given the contexts where ACRA operates, such relationships may be based on inherently unequal power dynamics and may undermine the credibility and integrity of ACRA's relief and development work. ACRA staff and related personnel must declare any previously existing relationships with beneficiaries to their line managers or ACRA HR HQ.



AWARENESS

Ensuring that all staff, representatives, and third parties connected to ACRA are aware of the high standards of behaviour and conduct expected from them to protect adults from any form of sexual abuse and exploitation in their private and working lives.



PREVENTION

Ensuring, through awareness and good practice, that staff and those who work with ACRA minimise the risks of any form of sexual exploitation and abuse, including but by no means limited to conducting relevant vetting and background checks of staff as part of their recruitment process.



REPORTING

Ensuring that all staff and those who work with ACRA are clear on sexual exploitation or abuse.



RESPONDING

Ensuring that immediate action is taken to identify and address reports of sexual exploitation and abuse and ensure the safety and well-being of what steps to take where suspicions or concerns arise regarding allegations of the person being sexually exploited or abused. ACRA will respond as soon as possible, it is highly recommended a response within 24 h.

ROLES AND RESPONSIBILITIES

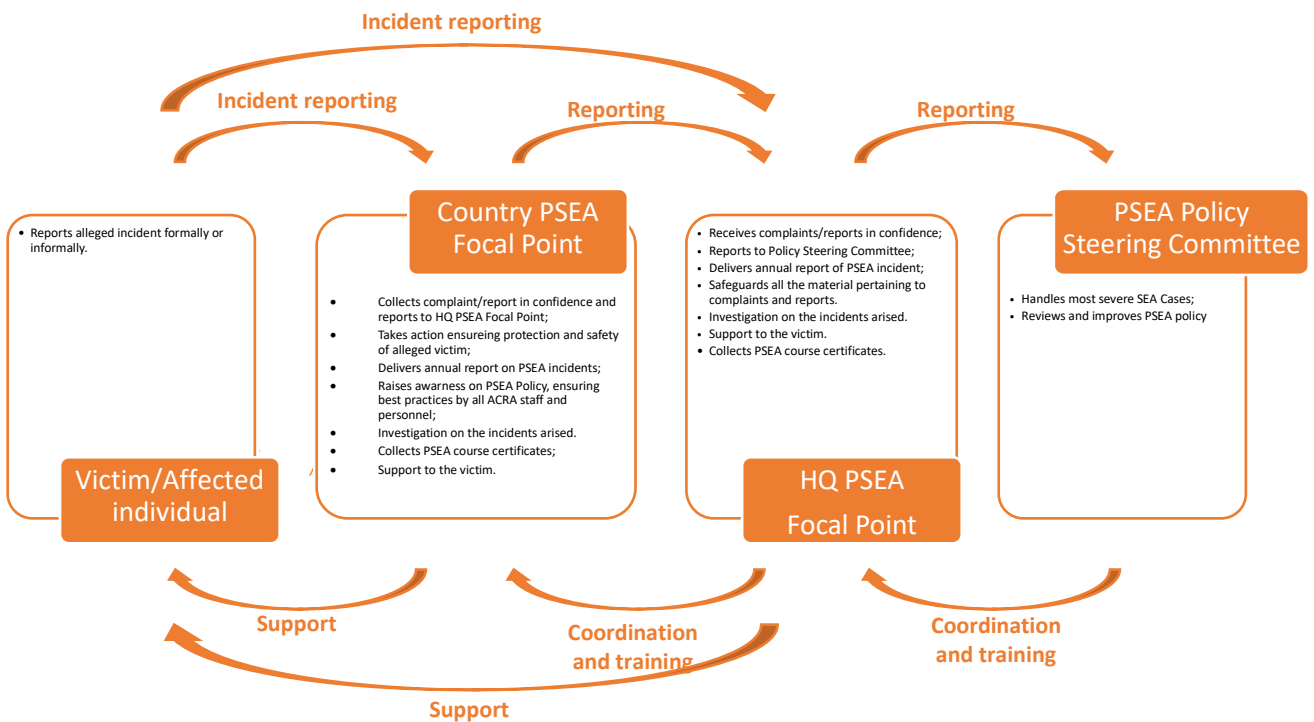
All ACRA staff and related personnel: everyone who works on behalf of ACRA is required to act quickly and immediately report suspicions or knowledge of a safeguarding concern or incident to a relevant contact at ACRA. Failure to report will be treated as serious and may result in termination of any agreement with ACRA. There is no obligation for an individual to report any incident that has happened to them.

Board members and Managing director: hold overall accountability for this policy and its implementation.

PSEA Focal Point: provides support to prevent and respond to SEA incidents, raising awareness, and promoting best practices by receiving concerns, supporting victims, and reporting concerns in a confidential manner. A PSEA Focal Point will be designated for every ACRA Country Office (**Country PSEA Focal Point**). The **HQ PSEA Focal Point** coordinates the work of the PSEA Policy Steering Committee and leads the development of training and awareness materials on the content of the PSEA Policy and related standards of behaviour in coordination with the Country PSEA Focal Points. The HQ PSEA Focal Point will be the person designated to receive complaints and reports about alleged SEA Incidents.

PSEA external advisors: provide support to PSEA Focal Points, staff, and programmes to prevent and respond to SEA incidents, raising awareness, conducting training, and promoting best practices, as well as receiving concerns, conducting referrals to specialized services, and supporting investigations.

PSEA Policy Steering Committee: is established to monitor and regularly report on progress to implement and adhere to the PSEA Policy to ACRA’s Board. The PSEA Policy Steering Committee will be composed of ACRA Managing Director, President, HQ PSEA Focal Point, and a Board member. The PSEA Policy Steering Committee will meet on an ad-hoc basis to provide oversight and management support for alleged SEA incidents. Moreover, the PSEA Policy Steering Committee will be responsible for regularly revising the PSEA Policy.





PROCEDURES AND RESPONSES

REPORTING

ACRA staff and related personnel have the responsibility to report any suspicion or concern of SEA. Any individual can raise a concern/complaint to ACRA about an incident they have experienced, witnessed, or heard about concerning an ACRA staff member or partner (suppliers, partners, contractor, etc.) without fear of retribution. ACRA staff and related personnel must not investigate allegations or suspicions themselves.

Anyone (including ACRA's beneficiaries) can raise a concern or make a complaint to ACRA about something they have experienced or witnessed without fear of repercussion. The complaint can be done verbally or in writing to ACRA HQ PSEA Focal Point, ACRA Country PSEA Focal Point or the dedicated mailbox [psea@acra.it]. Staff can also choose to raise concerns with their line manager or ACRA Managing Director at HQ level. Complaints can be done formally or informally:

Formal complaints

Formal complaints of possible SEA may be made by persons who consider being affected individuals or another person that becomes aware of the wrongdoing. Formal complaints may be done anonymously and are not subject to deadlines.

A formal complaint of SEA must describe the specific incident(s) of possible SEA. The Formal complaint shall include as much detail as possible. For instance, the complaint could include the following information:

- Name of the alleged offender
- Name of the alleged affected person (if the report is made by a third party).
- Date(s) and location(s) of incident(s)
- Description of incident(s)/patterns
- Names of witnesses, if any
- Any other relevant information, including documentary evidence, if available.

- Date of the submission of the report and name of the person making the report, unless the report is made anonymously.
- If the person making the report chooses to report on an anonymous basis, the reporter must provide sufficient information concerning the basis of the allegations and sufficient detail or supporting factual basis that the matter can be pursued responsibly. Otherwise, the matter typically cannot be pursued further.

Informal complaint and mediation

An alleged affected person may wish to deal with the situation of possible SEA in an informal manner. In this case, the affected person may ask for assistance from a mediator in seeking informal resolution. With the consent of the affected person, the mediator may meet informally with the alleged offender to provide information about the situation and discuss how it might be resolved. An unsuccessful attempt to resolve the matter informally does not preclude it from being formally reported.

INVESTIGATION

All concerns or allegations will always be taken seriously, and investigated and acted upon where appropriate, in line with ACRA's safeguarding principles listed below.

Robust and accountable case management: all allegations of SEA, and subsequent follow-up, will be documented in a secure and confidential database to ensure accountability.

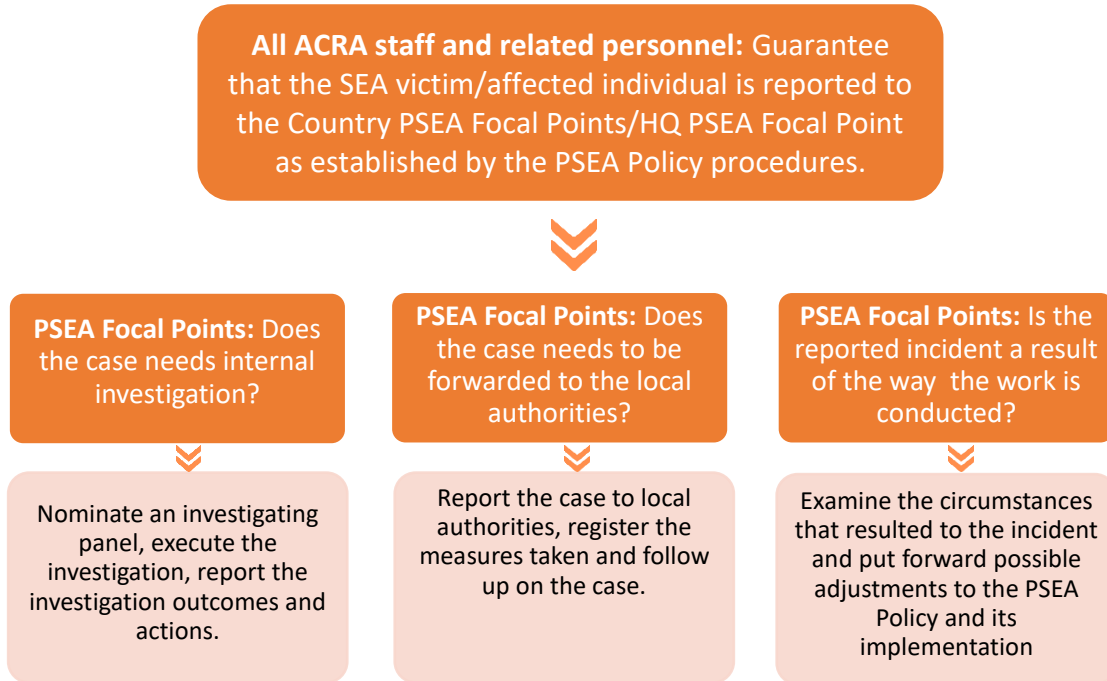
Investigations: ACRA will carry out independent, safe, and discreet investigations, through trained ACRA PSEA Focal Points, recognising the rights of and duty of care to everyone involved, including the complainant and/or survivor, witnesses and the subject of complaint (SoC). The following protocols need to be observed when interviewing alleged SEA victims/affected individuals:

- Victims will be told of the purpose of the interview and informed consent must be sought before the interview is conducted.
- Interviews will not be conducted in any space where it may create suspicion amongst outsiders (including authorities, community members, etc.).
- All efforts will be made to ensure that victims do not feel exposed or vulnerable during the interview.
- Interviewing techniques and methodologies should be age- gender-culture appropriate. As much as possible, follow-up interviews/discussions will be conducted by the same interviewer.
- Victims will be informed of all possible steps, including referral for assistance and eventual investigation.
- Appropriate measures will be taken to ensure safety and protection for victims, as well as alleged offenders and complainants if different from the victims. Where there is any conflict of interest between the victim and another involved party, the victim's wishes must be the principal consideration in case of handling, particularly when there is a risk of additional physical and/or emotional harm.
- Any intentionally false, malicious, or vexatious statement, misrepresentation, or accusation against another ACRA staff or a third party will also be considered serious misconduct.

Accountable decision-making: ACRA will take swift and appropriate action against ACRA employees and related personnel who are found to have committed SEA. This may include administrative or disciplinary action, and/or referral to the relevant local authorities if appropriate and safe to do so. If needed, the decision-making process will be subject to scrutiny by PSEA external advisors.

The Country PSEA Focal Point will be responsible for follow-up on the case together with the specialized case team (internal or external) if needed, record action taken and support provided, always coordinating with the HQ Safeguarding Focal Point. All response strategies need to be developed in a manner that balances respect for due process with a victim-focused approach in which the victim's wishes, safety, and well-being remain a priority in all matters and procedures.

Survivor Support: ACRA commits to refer survivors to competent support services as appropriate and available and according to the wants and the needs of the survivor. Support may include specialist psychosocial support such as counselling, medical assistance, legal counselling. The chart below summarizes steps to be taken when any allegation of SEA is reported formally or informally.



CONFIDENTIALITY AND DATA PROTECTION

Confidentiality of information is extremely important when working with SEA victims and incidents, and needs to be addressed with the utmost care. Every effort will be made to maintain confidentiality throughout the complaints process. Staff involved in the complaints process will be made aware of the importance of maintaining the confidentiality and may be asked to sign a confidentiality agreement. Any breach of the data protection and sharing protocols may be subject to disciplinary action, up to and including dismissal.

ACRA may disclose information about incidents as required by national laws to report criminal cases. All materials about complaints and reports about alleged acts of SEA will be handled in strict confidence to protect the rights of all involved and will be kept and safeguarded by the ACRA HQ PSEA Focal Point.

PROTECTION AGAINST RETALIATION

Any form of retaliation against complainants, victims, or other witnesses may entail disciplinary actions, up to and including termination of collaboration/contract.

SAFE RECRUITMENT

In compliance with applicable laws, ACRA is committed to preventing perpetrators of SEA from being (re)hired or (re)deployed. ACRA will ensure robust recruitment screening processes for all personnel, including employees, volunteers, consultants, and other representatives. As part of this, all application forms, interviews, and references must address safeguarding and equality requirements and attitudes.

All published vacancies will state that ACRA has a PSEA Policy that the successful candidate will be expected to comply with and promote.

ACRA will undertake a diligent reference “clear check” database of candidates during the recruiting process.

All staff, volunteers, interns, and consultants will be required to acknowledge in writing the receipt, understanding, and commitment to the PSEA Policy and related standards of behavior before the commencement of their contract.

ACRA will not hire or employ an applicant if the recruitment process or background check reveals that the applicant has been previously reported for a SEA incident or is not suitable to work with beneficiaries.

TRAINING

ACRA's induction process for all new staff, volunteers, and interns includes an online mandatory course (available at <https://agora.unicef.org/course/info.php?id=7380> in English, French and Spanish) on what SEA is and the content of the PSEA Policy to ensure that all ACRA staff is aware of the PSEA Policy guiding principles, the related standards of behavior, the implications of breaching these standards and the incident reporting procedures. The course includes a final test and provides a Certificate of Completion that will have to be presented to the PSEA Focal Point.

Make the PSEA policy summary available in local languages to be disseminated in target communities, with partners and other relevant stakeholders. Posters of the PSEA Policy commitments and related standards of behaviour must also be displayed in each ACRA Country Office and base.

PARTNERS AND CONTRACTORS

Acceptance of and compliance with the PSEA Policy and related standards of behaviour must be a condition of every partnership agreement or contract.

- ACRA will ensure that, when engaging in partnerships agreements, these agreements incorporate the ethic clauses of this Policy;
- ACRA will ensure that, when engaging in contracts with companies working directly with beneficiaries, these contracts incorporate the ethic clauses of this Policy or those of the company's (if it is of an acceptable standard);
- include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to abide by a Code of Conduct that is in line with the standards of this Policy;
- expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against sexual exploitation and abuse and sexual harassment, to investigate and report allegations thereof, or to take corrective actions when SEA has occurred, shall constitute grounds for ACRA to terminate such agreements.

When ACRA receives a complaint about a partner organisation/contractor, ACRA will expect the partner/contractor to respond safely, quickly, and appropriately.

Where appropriate, ACRA will work with the partner/contractor to address the issue through an appropriate independent investigation. If the outcome is that abuse has occurred, ongoing work with the partner/contractor cannot involve the individual(s) concerned. ACRA reserves the right to suspend or cancel a partnership agreement or contract based on an investigation into SEA allegations.

SAFE PROGRAMMING

All ACRA's interventions need to be designed and implemented to minimise actual or potential risks which might lead to sexual exploitation and abuse by ACRA staff and related personnel against beneficiaries or other members of the community they come into contact with or impact upon directly or indirectly, especially women and children. ACRA is committed to ensure SEA-safe programmes by identifying risk factors for vulnerability to SEA which may be related to the context of the specificity of the programmes themselves and taking all necessary mitigation measures.

It will be the responsibility of the ACRA country coordinators and regional desk officers to integrate SEA considerations into the design of needs assessment and new project proposals, including identification of activity-specific SEA risks and related SEA mitigation measures.

REVIEW OF THE POLICY

This policy will be reviewed (recommended every 24 months) with a process initiated by the PSEA Steering Policy Committee. The review process will take in due account all issues, criticalities and best practices emerged during the implementation of this policy. The PSEA Steering Policy Committee will be held accountable for the review and implementation of the PSEA policy.

Policy reviewed in September 2020

ANNEX

EXAMPLES OF CONDUCT OR BEHAVIOR WHICH CONSTITUTE HARASSMENT OR SEXUAL HARASSMENT

Harassment may be verbal or non-verbal and may be physical. Harassment may take the form of words, gestures, or actions which tend to annoy, alarm, abuse, demean, intimidate, belittle, humiliate or embarrass another person or persons or which create an intimidating, hostile, and/or offensive work environment. Harassment does not have to be intentional or deliberate; rather it exists when it is perceived as offensive by a reasonable individual.

Examples of **verbal harassment** include:

- Verbal abuse, insults, and name-calling;
- Shouting and aggressive behavior;
- Using a person as the constant or repeated target of jokes;
- Derogatory or offensive nicknames;
- Innuendo or other suggestive, offensive, or derogatory comments or jokes about a person's gender or sexual orientation;
- Unwanted and/or demeaning comments on dress, appearance, or physical characteristics;
- Slandering or maligning another person's reputation by gossip, rumor, and ridicule;
- Persistently making unwarranted critical or patronizing remarks in front of others or 'behind a person's back';
- Unwarranted, intrusive, or persistent questioning about a person's ethnic or racial origin including their culture or religion;
- Repeated and unwanted notes, messages, or calls;
- Notes, messages, or calls that are abusive, threaten, insult, attempt to coerce, humiliate or intimidate;
- Leaving an abusive, insulting, or threatening message in workspaces;
- Suggestive remarks about a person's clothing, body, hairstyle, appearance, or any aspect of their person or personal possessions.

Examples of **non-verbal harassment** include:

- Social exclusion, isolation or non-cooperation at work;
- Hostility demonstrated through sustained unfriendly contact or exclusion;
- Repeated use of offensive gestures;
- Displays of offensive material including posters, photographs, cartoons, graffiti, objects, or messages left on notice boards, desks, or common areas;
- Repeated giving of unwanted gifts or invitations;
- Repeated staring or aggressive facial expressions;
- Keeping or sending inappropriate screensavers that may offend others;
- Spreading malicious rumors;
- Using the e-mail or instant messaging system to send abusive, threatening, or insulting images to, or about, another employee or employees;

Examples of **physical harassment** include:

- Unwanted, uninvited or inappropriate touching, patting, hugging, or another physical contact (e.g. massaging a person without invitation or deliberately brushing up against them);
- Punching, hitting, pushing, slapping, kicking, deliberately tripping or biting another person.
- Throwing an object at another person or attacking a person with an object.

Sexual harassment

While sexual harassment typically involves a pattern of behavior, it can take the form of a single incident. Individuals of any gender can be affected by persons or perpetrators.

Examples of **sexual harassment** include:

- Rape, attempted rape or other sexual assault;
- Any sexual act committed using coercion or without consent – even if between individuals who are in a consensual intimate relationship or know each other as acquaintances (prior relationship, excessive use of alcohol, or previous sexual involvement do not lessen the seriousness of such an incident);
- Repeated requests or other forms of pressure for a sexual or other personal – rather than professional – relationship (e.g. repeated requests for ‘a date’);
- Innuendo or other suggestive, offensive, or derogatory comments or jokes about sex;
- Unwarranted, intrusive, or persistent questioning about a person's marital status or sexual interests, history, or orientation;
- Obscene messages sent by text message, email, video chat or left on an answering machine or voice mail;
- Open or implied threat that submission to sexual advances will be a condition of some form of commendation, work status, or access to promotion or development opportunity or positive performance evaluation;
- Remarks speculating about a person's sexual activities or history, or remarks about one's sexual activities or history;
- Displays of the material of a sexual nature including posters, pinups, cartoons, graffiti, objects, or messages left on notice boards, desks, or common areas;
- A pattern of conduct, which can be subtle, that has sexual overtones and is intended to create or has the effect of creating distress and/or humiliation in another person.

DECLARATION OF AGREEMENT TO BE BOUND BY UPHOLD THE ACRA PSEA POLICY FOR PARTNERS

[NAME OF THE ENTITY] hereby acknowledges that it has received and read a copy of the ACRA Protection from Sexual Exploitation and Abuse (PSEA) Policy.

Agrees that all forms of sexual exploitation and abuse violate universally recognized international norms and standards, and the principles upon which humanitarian action is based.

Accepts and commits to actively prevent acts of sexual exploitation and abuse by its personnel and associates, and to respond to sexual exploitation or abuse incidents that are perpetrated against beneficiaries or other members of the community in compliance with the ACRA PSEA Policy.

Ensures that no personnel hired, deployed, or engaged in projects implemented in partnership with ACRA or with the support of ACRA, have ever been involved in any form of sexual exploitation and abuse before.

Is fully aware to be liable to suspension or cancellation of the partnership agreement with ACRA should any of its personnel member or associate be found in breach of the ACRA PSEA Policy standards of behavior, and the concern is mishandled.

[NAME & SURNAME]	
Legal Representative of [NAME OF THE ENTITY]	
Date	
Place	

DECLARATION OF AGREEMENT TO BE BOUND BY AND UPHOLD THE ACRA PSEA POLICY AND THE ACRA CHILD PROTECTION AND SAFEGUARDING POLICY FOR PERSONNEL

I, the undersigned _____, hereby acknowledge that I have received, read and understood the ACRA Protection from Sexual Exploitation and Abuse Policy and the ACRA Child Protection and Safeguarding Policy, and pledge to abide by the expectations and provisions therein.

I am fully aware that should I fail to comply with these policies and related standards of behaviour, I will be liable to suspension, summary dismissal and/or face legal implications commensurate to the offence/crime I will have committed.

I testify that I have no prior criminal record in any country related to child abuse or sexual exploitation and abuse, and I have never been involved in any form of child abuse or sexual exploitation and abuse before.

I commit to respect and promote implementation of these policies at all times while under collaboration with ACRA by the way I conduct myself and by reporting any violation of the related standards of behaviour that come to my knowledge.

To show my acceptance and commitment to comply with the ACRA Protection from Sexual Exploitation and Abuse Policy and the ACRA Child Protection and Safeguarding Policy, I hereby sign this declaration form.

Signature:

Name:

Place and Date:

INCIDENT REPORT FOR REPORTING SEA ALLEGATIONS

If you have seen an actual incident or suspect and have cause for concern regarding an incident of child abuse or SEA, please follow the guidelines and fill out the questions below where appropriate. You must identify in this form whether it is an actual incident or a suspected incident.

CONFIDENTIAL: please restrict the access to this document and keep it stored safely.

Complaint Details (Person reporting the complaint): Name: _____ Position: _____ Relationship with ACRA: _____ Line Manager/Supervisor: _____ Contact details: _____	
Victim Details (Affected person): Name: _____ Sex: _____ Age: _____ Nationality: _____ Village/Town: _____ Municipality/District: _____ Country: _____	Parent/Legal Guardian/Caregiver Details (only if the victim is a child): Name: _____ Sex: _____ Age: _____ Nationality: _____ Relationship with the victim: _____ Village/Town: _____ Municipality/District: _____ Country: _____
Incident Details (please identify whether it is an actual incident or a suspected incident): Has the incident been seen or is the incident suspected? _____ Who disclosed the incident to you? _____ Date of the alleged incident: _____ Time of the alleged incident: _____ Location of the alleged incident: _____ Description of the alleged incident and how it's affecting you and your work (Please use additional sheets of paper if necessary and attach any relevant document or evidence): _____ _____ Was there any other individual involved in the alleged incident? If so, who? _____ Was there any witness? If so, who? _____	
Alleged Offender Details: Name: _____ Sex: _____ Age: _____ Ethnic origin/Nationality: _____ Position: _____ Relationship with ACRA: _____	
Observations (physical injuries or other observations): 	
Has the affected person previously complained about related incidents? If yes, when and to whom did he/she complain? 	
SIGNATURE PERSON REPORTING: 	
DATE: 	
SIGNATURE ACRA PSEA FOCAL POINT FOR RECEPTION : 	
REFERENCE NUMBER (TO BE COMPLETED BY THE PSEA FOCAL POINT): [XX/YY]	

REPORT ON INVESTIGATIONS & ACTIONS TAKEN FOR SEA INCIDENT

The PSEA focal point, following the reporting of an incident, will fill in a report on the actions taken by the organization in response to the incident reported, to the resolution.

CONFIDENTIAL: please restrict the access to this document and keep it stored safely.

REFERENCE NUMBER: [XX/YY]
Description of the action taken by the organization in response to the alleged incident reported (investigations, support measures to protect the victim, warning, legal action, dismissal, monitoring, ect.), specify the timing, if external support involved:
Description of the action taken by other organizations or entities (local authorities, ect.) in response to the allegations:
RESOLUTION:
DATE:
SIGNATURE ACRA PSEA FOCAL POINT :

ANNUAL REPORT ON SEA COMPLAINTS

For the period from 01/01/YY to 31/12/YY

This report summarizes every sexual harassment complaint activity at ACRA for the year _____. The report also highlights improvements that have been implemented as a direct response from such complaints. This report is filled in by the HQ/Country Focal Point.

Table 1: Activity and Performance Data

	YY
Number of complaints formal received	
Number of complaints informal received	
Number of complaints closed	

Table 2: Details of each complaint received

Month request was received	Ref no. XX/YY	Channel of complaint	Issue of complaint	Outcomes and Actions

COUNTRY/HQ FOCAL POINT:
NAME SURNAME:
SIGNATURE:
DATE:

Terms of Reference Country PSEA Focal Point

General purpose of the role:

With the support and supervision of the PSEA Focal Point HQ, the Country PSEA Focal Point established by ACRA is assigned to collect complaints and reports about alleged acts of SEA involving ACRA staff and personnel within the geographical area/country of responsibility. Additionally, the Country PSEA Focal Point has the responsibility to actively ensure awareness on the best practices in accordance to the PSEA Policy.

Reporting line

HQ PSEA Focal Point

Main responsibilities and tasks

- Collect complaints and reports about alleged acts of SEA involving ACRA staff and personnel within the geographical area/country of responsibility;
- Ensure complete confidentiality of complaints and reports;
- Take appropriate action to support and ensure safety to victims of alleged cases of SEA, as well as alleged offenders;
- Follow-up on the SEA cases together with specialized team (internal or external) if needed;
- Update PSEA Focal Point HQ by signalling the received reports;
- Deliver the annual report on PSEA complaints and reports related to the geographical area/country of responsibility to the HQ PSEA Focal Point;
- Raise awareness on the PSEA Policy, promoting and ensuring best practices by all ACRA staff and personnel, as well as beneficiaries and target communities;
- Encourage and disseminate the availability of reporting procedures in the clearest way, to ensure that victims are aware of their possibilities of action;
- Guarantee that every ACRA staff and related personnel within the geographical are/country of responsibility has completed the mandatory training and ensuring that the course requested by ACRA has been completed by collecting the course certificates;
- Register all the received course certificates inside ACRA's archive
- Collect ACRA staff and personnel's declarations of any previously existing relationships with beneficiaries (if it is the case);
- Share with the HQ PSEA Focal Point lessons learned, best practices and risks to improve the PSEA reporting mechanisms, policy and protocols;
- Provide inputs, suggestions for improvements and recommendations for future actions for the regular revision of the country-specific PSEA strategy.
- Keep the clear check register in the country for candidate and staff and related personnel.

I, the undersigned _____, hereby acknowledge that I have read, understood and agree to perform the role of Country PSEA Focal Point in accordance with this terms of reference.

Signature: _____

Date: _____

Terms of Reference HQ PSEA Focal Point

General purpose of the role:

The HQ PSEA Focal Point established by ACRA is in charge of ensuring the implementation of the PSEA Policy within the country mission, with particular emphasis on the PSEA training and awareness. Additionally, the HQ PSEA Focal Point is in charge of monitoring and supervising the Country PSEA Focal Point(s) to ensure proper and effective response to SEA allegations.

Reporting line

PSEA Policy Steering Committee

Main responsibilities and tasks:

- Receive complaints and reports about alleged SEA Incidents;
- Safeguard all the materials pertaining to complaints and reports about alleged acts of SEA in strict confidence;
- Alert and update the PSEA Policy Steering Committee by signalling critical SEA incidents;
- Prepare the Annual Report on PSEA allegations for the HQ and country missions and submit the report at least once a year to the PSEA Policy Steering Committee;
- Coordinate the work of the PSEA Policy Steering Committee;
- Support the development of the country-specific PSEA strategy, as well as the elaboration of the country-specific annual implementation plan and the identification of the necessary resources for implementation;
- Monitor and regularly review the effectiveness of the PSEA training and awareness materials and programmes;
- Guarantee that every ACRA staff and related personnel has completed the mandatory training and ensuring that the course requested by ACRA has been completed by collecting the course certificates;
- Register all the received course certificates inside ACRA's archive
- Lead the development of training and awareness materials on the content of the PSEA Policy and related standards of behaviour;
- Collect ACRA staff and personnel's declarations of any previously existing relationships with (if it is the case);
- beneficiaries Sit in the meetings of the PSEA Policy Steering Committee on ad-hoc basis.
- Keep the clear check register in the country for candidate and staff and related personnel.

I, the undersigned _____, hereby acknowledge that I have read, understood and agree to perform the role of HQ PSEA Focal Point in accordance with this terms of reference.

Signature: _____

Date: _____

Terms of Reference PSEA Policy Steering Committee

General purpose of the role:

The PSEA Policy Steering Committee established by ACRA is responsible for the monitoring and regular report on the progress to implement and adhere to the PSEA Policy to ACRA's Board. The PSEA Policy Steering Committee is composed by the ACRA Managing Director, President, HQ PSEA Focal Point, and a Board Member.

Main responsibilities and tasks:

- Supervise the Country PSEA Focal Point(s) and HQ PSEA Focal Points to ensure proper and effective response to SEA allegations;
- Monitor the implementation of the PSEA Policy to ACRA's Board;
- Meet on ad-hoc basis to provide oversight and management support for alleged SEA incidents;
- Periodically (advisably, if possible, every 24 months) review the PSEA Policy for possible improvements both on the implementation and on the reporting procedures;
- Analyse annual report provided by Country PSEA Focal Point(s) and by HQ Focal Points;
- Handle the most severe cases of SEA reported to the PSEA Focal Points. Such cases will have to be reported to ACRA CDA.

I, the undersigned _____, hereby acknowledge that I have read, understood and agree to perform the role of PSEA Policy Steering Committee in accordance with this terms of reference.

Signature: _____

Date: _____

ABSTRACT OF ACRA PSEA POLICY

POLICY STATEMENT

ACRA is committed to provide a safe environment for all persons free from discrimination on any ground and harassment at work including sexual harassment. Every ACRA staff and personnel also have a corresponding responsibility to actively promote such an environment.

ACRA has a zero-tolerance policy towards sexual harassment, exploitation, and abuse in the workplace will treat all incidents seriously and promptly investigate all allegations of sexual harassment.

ORGANISATION'S PSEA PRINCIPLES AND COMMITMENTS

The specific standards defined by the PSEA Policy apply to all ACRA staff and personnel – including ACRA staff at all levels in ACRA HQ and ACRA country offices, board members, volunteers, interns, contractors, external consultants, day labourers, individual and corporate suppliers or contractors and their related personnel – while under a contract with ACRA. They apply during or outside of working hours, every day of the year. Such standards state as follows:

- **Sexual exploitation and abuse** by ACRA staff and related personnel constitute acts of gross misconduct and are, therefore, grounds for termination of employment or contract/agreement. Sexual harassment by ACRA staff and related personnel is grounds for disciplinary action up to and including dismissal.
- **Sexual activity with children (persons under the age of 18) is prohibited** regardless of the age of the majority or age of consent locally. Mistaken belief in the age of the child is not a defence.
- **Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour by ACRA staff and related personnel is prohibited at all times.** This includes buying sex or the exchange of assistance that is due to programme participants.
- **Sexual relationships between ACRA staff and related personnel and beneficiaries are forbidden.** Given the contexts where ACRA operates, such relationships may be based on inherently unequal power dynamics and may undermine the credibility and integrity of ACRA's relief and development work. ACRA staff and related personnel must declare any previously existing relationships with beneficiaries to their line managers or ACRA HR HQ.
- **ACRA staff and related personnel have the responsibility to report any suspicion or concern of SEA.** Any individual can raise a concern/complaint to ACRA about an incident they have experienced, witnessed, or heard about concerning an ACRA staff member or partner (suppliers, partners, contractor, etc.) without fear of retribution.

ACRA is committed to promote a working environment free of sexual harassment in which all people are treated with respect and is committed to prevent and respond to sexual exploitation and abuse and sexual harassment. Any violation of these standards establishes severe misconduct. Failure to obey these standards or failure to report sexual exploitation or abuse can result in disciplinary action. This action may include termination of the contract with ACRA.

Acceptance and compliance with the standards defined by the PSEA policy are a necessary condition to conclude any arrangement or contract. ACRA will reserve the right to not enter in such agreements with individuals or entities which do not recognize the standards defined by these standards.

For further details, please consult the complete ACRA PSEA Policy.