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# **Protection from Sexual Exploitation and Abuse Policy**

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# Protection from Sexual Exploitation and Abuse Policy

SRM-PLC-007 Rev 0  
Dated 10 Feb 2023

## APPROVAL

The signatures below certify that this document has been reviewed and accepted, and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Signature	Position	Date
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## AMENDMENT RECORD

This document is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

Page No.	Context	Revision	Date

## COMPANY PROPRIETARY INFORMATION

The electronic version of this document is the latest revision. It is the responsibility of the individual to ensure that any paper material is the current revision. The printed version of this manual is uncontrolled, except when provided with a document reference number and revision in the field below:

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## 1 Introduction

As SRM works to advance the well-being of employees, clients and vulnerable communities in Somalia, we as SRM employees and representatives, must always uphold and practice the highest standards of behaviour, accountability, and integrity with everyone we encounter.

SRM is committed to the protection from sexual exploitation and abuse (PSEA) by its staff and humanitarian workers.

We recognise both the vulnerability of women, girls, and boys to sexual exploitation and abuse and the inherent power dynamics evident within humanitarian and development partnerships.

Security personnel and managers hold power over the population they serve, their staff and implementing partners.

We have an obligation to use our authority respectfully. We must not abuse our power and influence over the lives and well-being of the participants of our programs and others in the communities where SRM works.

“Do no harm” is a core principle of humanitarian action. SRM is committed to giving this principle the adequate resources and attention to be implemented at all levels and ensuring that this policy is adhered to.

SRM’s Code of Conduct highlights that abuse, harassment and discrimination based on gender, gender identity, and sexual orientation are unacceptable in the workplace and in our contact with others.

Sexual exploitation and abuse of personnel or others in the communities we serve constitute acts of gross misconduct and are, therefore, grounds for termination of employment, partnership, and association with SRM.

The PSEA Guidelines apply to SRM’s

1. Employees
2. Volunteers
3. Interns
4. Service providers
5. Partners

The PSEA Procedures and Guidelines are supported and complemented by the following SRM’s policies:

1. SRM Company Policy
2. Human Rights Policy
3. Complaints and Grievance Policy
4. Whistle Blower Protection Policy
5. SKA’s Employee Handbook

## 2 Purpose

The PSEA Policy applies to everyone associated with the company. This includes the SRM's Management and all employees, whether part-time or full-time and to any paid or unpaid consultants, contractors, interns, and volunteers who provide services to SRM worldwide.

Any violation of the PSEA Policy will be treated seriously and dealt with according to SRM's disciplinary procedures detailed in the Employee Handbook and applicable laws as appropriate. This may result in a disciplinary sanction up to and including termination of employment and legal action.

Those in positions of authority with SRM have to ensure adherence to the SRM's PSEA Policy by themselves and others and support and develop appropriate systems to facilitate compliance, disclosures, and follow-up.

SRM will require that partner organisation employees read and agree to the SRM's Company Policy, Human Rights Policy, Statement of Conformance and the PSEA Procedures and Guidelines.

Some SRM's partners/clients have comprehensive Code of Ethics, Code of Conduct, and/or PSEA Policies that espouse the principles of SRM's Code of Conduct and PSEA Procedures and Guidelines and may, in some cases, exceed SRM's guidelines and procedures as outlined in this document.

In such cases, SRM's partners/agents should share their Code of Conduct with SRM and jointly discuss and agree on addressing any policy inconsistencies.

SRM will include in all Memorandums of Understanding, Agreements, and Contracts a clause that stipulates that partners/agents:

1. commit to the prevention of sexual exploitation and abuse
2. establish an accessible, transparent, and confidential complaint-handling mechanism
3. processes within their organisations and programs
4. ensure that all their employees and volunteers are trained on PSEA and to identify and mitigate potential risks of SEA
5. raise beneficiary awareness and community-level confidential mechanisms for reporting SEA

## 3 Definitions & Acronyms

Abuse is defined, generally, as any action that intentionally harms or injures another person, in the case of this policy, based on gender, gender identity, or sexual orientation.

In many cases, it is characterised by unbalanced power relationships between stakeholders (the abuser and the victim).

Disclosure is a specific allegation of abuse made against a named individual.

Harassment is defined as unwelcome behaviour of offensive nature severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive. This includes discrimination based on gender, race, religion, sex (including pregnancy), ethnicity, age, disability, or genetic

information. It includes bullying, stalking, sexual harassment, personal harassment, and harassment based on the abovementioned characteristics.

PSEA means Protection from Sexual Exploitation and Abuse.

Sensitive cases are cases where individuals or groups are harmed, discriminated against, exploited, or neglected by individuals based on gender, gender identity, or sexual orientation. This includes, but is not limited to:

1. Non-compliance with the SRM's Protection Against Sexual Exploitation and Abuse Policy.
2. Any harm caused by an individual or organisation contracted by SRM (employee, volunteer, trainee, consultant, partner, sub-grantee etc.).
3. The harm done can be physical, sexual, emotional, and/or discriminatory means and can lead to situations of exploitation and abuse of power

Sexual abuse means the actual or threatened physical intrusion of a sexual nature, including inappropriate touching or harassment, which can occur

1. by force;
2. under unequal conditions; or
3. under coercive conditions.

Sexual exploitation are practices by which a person achieves sexual gratification, financial gain, or advancement through the abuse or exploitation of a person's sexuality by abrogating that person's human right to dignity, equality, autonomy, physical and mental well-being, i.e. trafficking, prostitution, prostitution tourism, bride trade, pornography, stripping, battering, incest, rape, and sexual harassment.

Suspicion is when a concern is expressed about abuse that may have taken place or concern that abuse may take place.

Exploitation shall include, at a minimum, the exploitation or the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices like slavery, servitude, or the removal of organs.

Trafficking in Persons is the recruitment, transportation, transfer, harbouring, or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, the abuse of power, or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

## 4 Policy Statement

SRM staff and all clients to this policy must never:

1. Sexually exploit or sexually abuse any individual.
2. Engage in any sexual activity with a child or children regardless of the local age of majority or age of consent. Mistaken belief in the age of a child is not a defence.
3. Act in ways that may place a child at risk of abuse, including not giving due consideration to assessing and reducing potential risks to children as a result of implementing activities. Behaviours and actions that are prohibited include, but are not limited to, using inappropriate language or behaviour when dealing with a child or children, bullying and harassing a child verbally or

physically, physical punishment, and exposing a child to pornography, including online grooming and trafficking. Whenever possible, avoid being alone with a child.

4. Consume, purchase, sell, possess, and distribute any forms of child pornography.
5. Exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading, or exploitative behaviour. This includes the buying of or profiting from sexual services as well as the exchange of assistance that is due to right holders for sexual favours.
6. Exploit the vulnerability of any target group in the context of development, humanitarian and advocacy work, especially women and children, or allow any person(s) to be put into compromising situations.
7. Never abuse a position to withhold development or humanitarian assistance or give preferential treatment in order to solicit sexual favours, gifts, payments of any kind, or advantage.
8. Engage in sexual relationships with members of crisis-affected populations given their increased vulnerability and since such relationships are based on inherently unequal power dynamics and undermine the credibility and integrity of aid work.

SRM staff must:

1. Inform their line manager when engaging in a long-term relationship with an employee, to prevent the perception of a conflict of interest in countries where SRM and its partners undertake long-term development work.
2. When an SRM employee develops concerns or suspicions regarding sexual abuse or exploitation by a client to this policy, whether in the same agency or not, they must report such concerns through SRM's established reporting mechanisms.
3. SRM employees are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of the SRM PSEA Policy.
4. Managers at all levels support and develop systems that maintain this environment.
5. The SRM PSEA Policy encompasses all types of SEA and exploitation and organised abuses of power, including exploitation, forced labour, slavery, and trafficking.
6. SRM condemns exploitation, slavery, and forced labour and has a zero-tolerance policy towards anyone exploiting human beings for their benefit based on gender, gender identity, or sexual orientation. These principles are also embedded in the SKA Employee Handbook and the Code of Conduct.

## 5 Reporting

It is the obligation of all SRM's staff and related personnel to raise any concerns or suspicions they have, actual or perceived, of any breach of the PSEA Policy by any colleague or client to the policy.

This should be done through:

1. SRM's internal and external mechanism as laid out in the Whistleblowing Policy;  
OR
2. To a senior manager with whom they feel comfortable;  
OR

3. The Country team focal point for PSEA.

When made aware of an alleged breach of the PSEA Policy, SRM will:

1. Take appropriate action to the best of its capacity to protect persons from retaliation
2. when allegations of sexual exploitation and abuse are made in good faith.
3. Investigate allegations of sexual exploitation and abuse involving SRM's staff and related personnel in a timely and professional manner, and to the best of its capacity encourage all designated stakeholders to do the same.
4. Inform relevant regulatory authorities as contracts and law require.
5. Use appropriate interviewing practices with complainants and witnesses, particularly with children. This may include engaging professional investigators or securing investigative expertise as appropriate.
6. Take swift and appropriate action, including legal action when required, against
7. employees and related personnel who commit sexual exploitation and/or abuse.
8. Take swift and appropriate action against those aware of such abuse/exploitation but did not report it.
9. Support survivors of SEA, including but not limited to medical assistance, if required.
10. All SRM staff should be made aware of the reporting mechanisms for PSEA by ensuring that reporting lines on how to raise concerns are displayed in an accessible location in all SRM offices. This display must contain the contacts of all focal points, the internal and external whistleblowing contacts, the complaints response process

## 6 Training and Communication

All staff, related personnel and visitors are to be informed about the SRM's PSEA Policy during their employment/volunteer on-boarding. It is the responsibility of the field office where staff are stationed to ensure that all staff members receive training on the SRM's PSEA Policy. Each country's Protection Focal Point will also conduct regular updates and specific training to meet the needs of particular staff roles within the local context and its accompanying risks.

SRM will audit its operations annually as part of their internal audit to ensure that PSEA is being addressed correctly in 4 components:

1. **Policy:** the SRM PSEA policy is applied in all SRM's country programs it is easily accessible to all staff and fully understood by all SRM staff and related personnel.
2. **Processes:** systems are in place to reduce risks of abuse, rumors, and the possibility of harm.
3. **People:** staff are recruited, managed, and work in an environment that addresses PSEA through support, training, information, and response.
4. **Accountability:** systems are in place to receive and respond to concerns and to recognise and limit risks.



## 7 Non-compliance

Any concern regarding PSEA or suspicion of SEA or a breach of the SRM's PSEA Policy, at any level, is treated with the utmost seriousness by SRM's. The disciplinary actions are detailed in SRM's Employee Handbook and include an investigation into gross misconduct and breach of Policies.

SRM appreciates that cases of sexual abuse or exploitation can be exceptionally difficult to discover and/or prove. Survivors of sexual abuse and exploitation often face enormous social and cultural barriers to reporting any abuse or exploitation. In many cases alleged perpetrators may wield power or position over their victims and/ or live in close proximity to them.

SRM recognises that these factors may interfere with any investigation into cases of sexual abuse or exploitation. SRM also recognises the significant damage that can be caused by malicious or unfounded accusations and will endeavor to provide protection for staff who may be wrongly accused.

## 8 Appendix 1 - Acknowledgement



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I acknowledge receipt of the SRM's Protection from Sexual Exploitation and Abuse Policy and Procedures. I have read the policy; I understand it, and I accept the contents as part of my condition:

## **Of employment with SRM**

**OR**

## **contracting to SRM**

I acknowledge that I must attend all training related to the SRM PSEA Policy. Failure to complete the training program will result in the termination of my employment, volunteer association, or contracting ability with SRM.

All new hires and associations with SRM must complete their initial training within 90 days of acknowledging this form. I understand that it is my responsibility to ensure this training is complete.

Name

Signature

Date

## 9 Publication

This policy and procedure will be disseminated to all employees as part of the induction process, broadcasted through emails, and on the company website for all non-employees.