



ہلالِ احمر پاکستان

PREVENTION OF SEXUAL EXPLOITATION ABUSE AND HARASSMENT (PSEA/H) POLICY





ACRONYM

ACRONYMS

GBV	Gender Based Violence
HR	Human Resource
IASC	Inter-Agency Standing Committee
PSEA	Prevention of Sexual Exploitation Abuse
PRCS	Pakistan Red Cross Society
SEA	Sexual Exploitation Abuse

POLICY

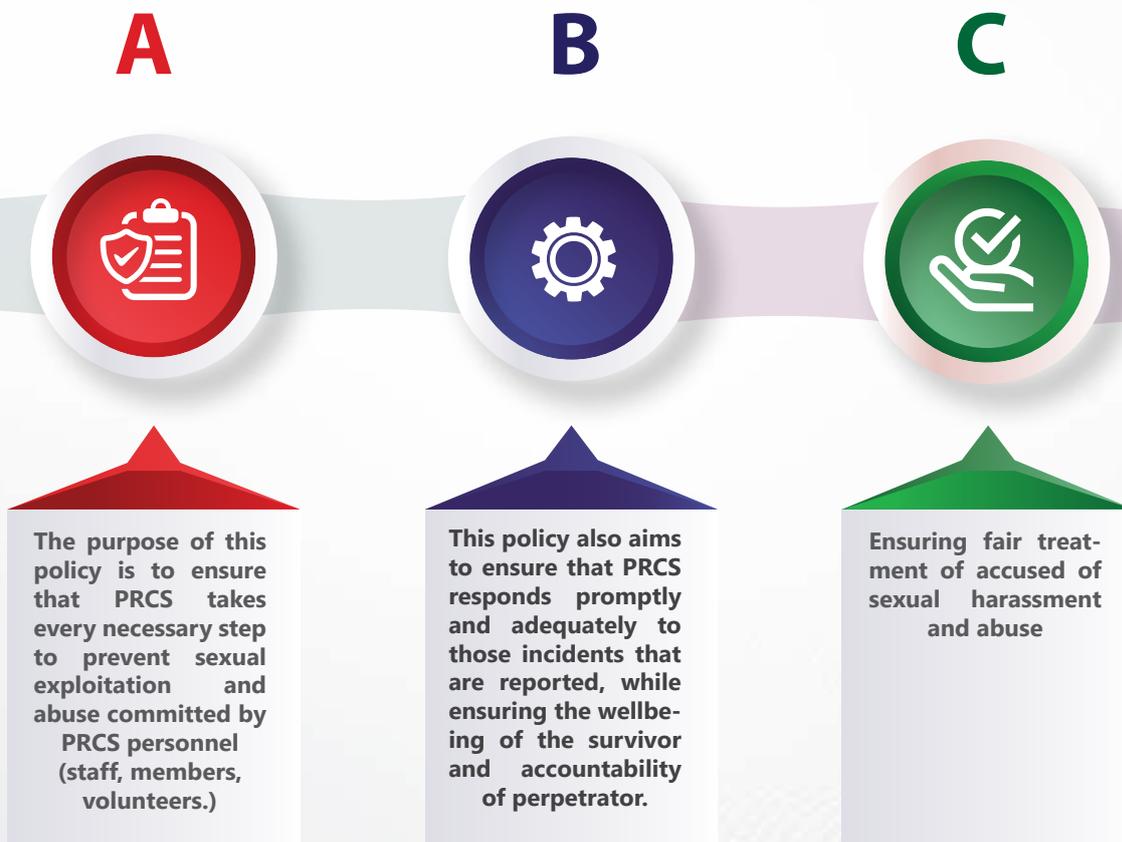
1. POLICY STATEMENT

At PRCS, we prioritize the right of all individuals to live free from sexual exploitation. We acknowledge the unequal power dynamics within our organization and the inherent risk of staff abusing their positions. Therefore, we have a zero-tolerance policy towards sexual harassment, abuse, or exploitation by any of our employees, interns, volunteers, consultants, members, contractors or partners. The PRCS Secretary General and Managers are accountable for addressing and taking action against those found guilty of sexual exploitation and abuse, which can result in dismissal. This policy covers sexual exploitation and abuse, as well as sexual harassment of individuals benefiting from PRCS protection or assistance. Sexual harassment between PRCS staff, volunteers is addressed separately by the Code of Conduct and workplace harassment and discrimination prevention and response policy.





2. PURPOSE OF THIS POLICY



Policy

3. SCOPE OF THE POLICY

This policy applies to all Pakistan Red Cross Society staff, interns, volunteers, members, contractors and partners, both during and outside working hours in so far that the policy is not inconsistent with the national and domestic law.





4. DEFINITIONS

4.1 Sexual Abuse

The term “sexual abuse” means that the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

4.2 Sexual Exploitation

The term ‘sexual exploitation’ refers to any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes with respect to affected Persons, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. Any payment (through cash or any other commodity or favor) for sexual services is considered to constitute sexual exploitation.

4.3 Sexual Violence

Sexual violence is any sexual act or attempt to obtain a sexual act by violence or coercion, acts to traffic a person or acts directed against a person’s sexuality, regardless of relationship to the victim.

4.4 Sexual Harassment

Sexual harassment is any unwelcome conduct of a sexual nature, whether verbal, written, or physical, that could reasonably cause offense or humiliation. This includes unwelcome sexual advances, unsolicited requests for sexual favours, or any other conduct of a sexual nature that offends, intimidates, or humiliates another person.

Sexual harassment may occur between persons of different sexes or the same sex and regardless of the rank and status of the individuals involved.

Sexual harassment can take many forms, including (but not limited to):

- a. Verbal comments of a sexual nature, such as remarks about a person’s appearance, questions about their sex life or offensive jokes.
- b. Non-verbal, such as displaying pornographic or explicit images, staring in a way that makes the recipient uncomfortable, sexual gestures or written comments of a sexual nature such as offensive or inappropriate.
- c. Physical, such as unwanted physical contact, touching, and assault (this includes attempts and threats to do these things).

When addressing allegations of sexual harassment, PRCS is concerned with the impact of the behaviour on the complainant, not the intention of the person accused. An action or behaviour of a sexual nature can still be considered sexual harassment even if the alleged harasser didn't intend for it to be harmful.

4.5 Coercing

Coercion means, forcing a person to do something that they would not normally do by making threats against their safety or well-being, or that of their relatives or property. Coercion covers a whole spectrum of degrees of force. Apart from physical force, it may involve psychological intimidation, blackmail, or other threats. For instance, threats of being dismissed from a job or of not obtaining a job that is sought. It may also occur when a person is unable to give consent.

4.6 Child

For the purpose of this policy, a child/minor is defined as any person under 18 years old.

4.7 Power

Refers to authority or the decisive ability to materially affect various forms of rights, entitlements or relationships. Power arises most crucially from, among others, position, rank, influence, status or control of resources. Unequal power relationships provide among the most critical settings for sexual exploitation and abuse in an emergency/disaster environment.

4.8 Protection

Protection includes those measures that are necessary or actually taken to ensure that individual basic human rights, welfare and physical security and integrity are recognised and safeguarded in accordance with national and international standards.

4.9 Informed Consent:

Consent signifies the approval of the individual providing the information for the information to be used as explained. It must therefore be specified whether all data and information obtained provided can be used, including the identity of the individual providing the information, or whether the information may be used on the condition that the identity of the individual providing the information is kept confidential. They must have the power to exercise their right to refuse to engage in an action, and to not be coerced. Persons with disabilities may need specific support based on the nature of their impairment, whether it be intellectual, or mental to give consent.



GUIDELINES

5. GUIDING PRINCIPLES

PRCS Applies a Survivor Centered Approach to SEA, i.e.

Do no harm: no action should be taken that would worsen the situation of a survivor of sexual exploitation or abuse.

Respect: all actions taken are guided by respect for the rights and dignity of the survivor.

Safety: The Safety and Security of the Survivor is the Number one Priority for all Actors.

Confidentiality: There must be strict adherence to confidentiality regarding the survivor's identity and other identifying information in every aspect of case handling. All actions are to be taken to ensure that any matter is handled in full confidentiality.

Non-discrimination: PRCS provides equal and fair treatment to anyone in need of help due to an SEA incident involving PRCS Personnel.

Child protection: Child survivors are to benefit from a particular attention and their specific needs must be addressed. Child protection specialists are consulted regarding the care for children.



6. SIX CORE STANDARDS

Pakistan Red Crescent Society is Committed to Achieve the Full Implementation of the Six Core Standards that are Set by the Inter Agency Standing Committee.

1. Any act of Sexual exploitation and abuse by PRCS staff, interns, volunteers or contractors constitutes an act of gross misconduct and violation of/ breach of contract therefore, constitute grounds for termination of employment or agreements.
2. PRCS staff, volunteers, interns and contractors are prohibited from engaging in sexual activity with children/minor (persons under the age of 18) regardless of the age of majority or age of consent set legally or culturally. Mistaken belief regarding the age of a child/minor is not a defense.
3. PRCS staff, volunteers, interns and contractors are prohibited from engaging in any exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior. Hence, exchanging assistance for any profit or favor with beneficiaries is also prohibited.
4. PRCS staff, volunteers, interns and contractors are prohibited from engaging in any sexual relationship with any PRCS beneficiary in order to uphold the integrity, transparency and credibility of the national society.
5. PRCS staff and volunteers hold a responsibility of reporting all concerns or suspicions regarding sexual abuse or exploitation by a fellow colleague, whether in the same agency or not. They must use the reporting mechanism established by PRCS.
6. PRCS staff and volunteers are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.



7. PROCEDURES FOR REPORTING BREACHES OF THE POLICY

7.1 Raising Complaint or Concern

PRCS is dedicated to ensure a safe environment for all staff, volunteers and beneficiaries. Hence, reporting mechanisms have been developed to allow any person to report any experienced or witnessed violation of this policy or file an SEA/H complaint without a fear of retaliation.

7.2 Internal

- A. Staff, interns and volunteers can report any violation of this policy to the following personnel:
- B. Relevant committee or any of its members
- C. HR staff and line managers shall refer any SEA/H complaint to the Safeguarding committee.
- D. Complainant can also report any SEA/H allegation to the following email address
(whistleblowcomplaints@prcs.org.pk)

7.3 External

PRCS beneficiaries can report any SEA complaint through one of four existing options:

- A. PRCS's complaint and feedback hotline: that is available as a means of reporting. Beneficiaries can call the hotline on **1030** to report any breach of this policy or case of SEA.
- B. Specific email address; that is only accessed by the Safeguarding FP and relevant committee members.
- C. Any PRCS staff or volunteer; aware are also able to receive SEA/H allegations.
- D. Complaint/Feedback boxes placed in the community

7.4: Case logging and Reporting

All complaints received through any of the means of mechanism are referred confidentially to the Relevant committee at the PRCS.

The relevant committee will then log the case and contact the complainant to conduct a confidential preliminary interview with them. Following the interview, the relevant committee or any of its members will fill out an incident report form (refer to Annex 1) and constantly update it in order to document the incident and the process that followed.

The relevant committee will ask the complainant for their informed consent to proceed with the investigation:

- I. If the complainant refuses, the investigation shall not proceed but will still be logged. In this case, other actions will be taken such as awareness raising, monitoring and evaluation visits and others.
- II. If the complainant accepts, the investigation procedures will be activated.

Furthermore, after logging the case, if the relevant committee notices that there are two or more complaints regarding the same person or within the same departments, an investigation procedure will be activated. In such situations, the complainant will not be involved nor named without their consent during the investigation however it's important to note that the anonymous reporting or lack of evidence may limit further pursuit beyond an initial review and could impact referrals to the appropriate resources.

7.5: Investigation and Case Management

Any investigation shall be conducted by a minimum of three qualified SGBV/SEA investigators comprising of at least one female. If there are no certified investigators in PRCS it shall be at a discussion of PRCS to seek the support of other external certified consultants. Investigations of sexual exploitation and abuse will be carried out in a timely, fair, and objective manner. This includes interviewing complainants, accused persons and any witnesses. The alleged perpetrator will also be interviewed and provided an opportunity to be heard. All information and documented evidence will be held securely and in the strictest confidence as far as is appropriate.

Anyone who is interviewed will have the right to review their statements as recorded by the investigators to ensure its accuracy. The investigators will prepare a written report that will include:

- name of complainant and of the accused
- the statement of the complainant
- a description of the allegations, including dates, times and locations
- the response of the person the complaint was made against
- a summary of information learned from witnesses (if applicable); and
- a decision about whether, on a balance of probabilities, exploitation or abuse did occur.
- the written report shall be submitted along with the recommendations by the relevant committee
- to the competent authority to proceed in final review.

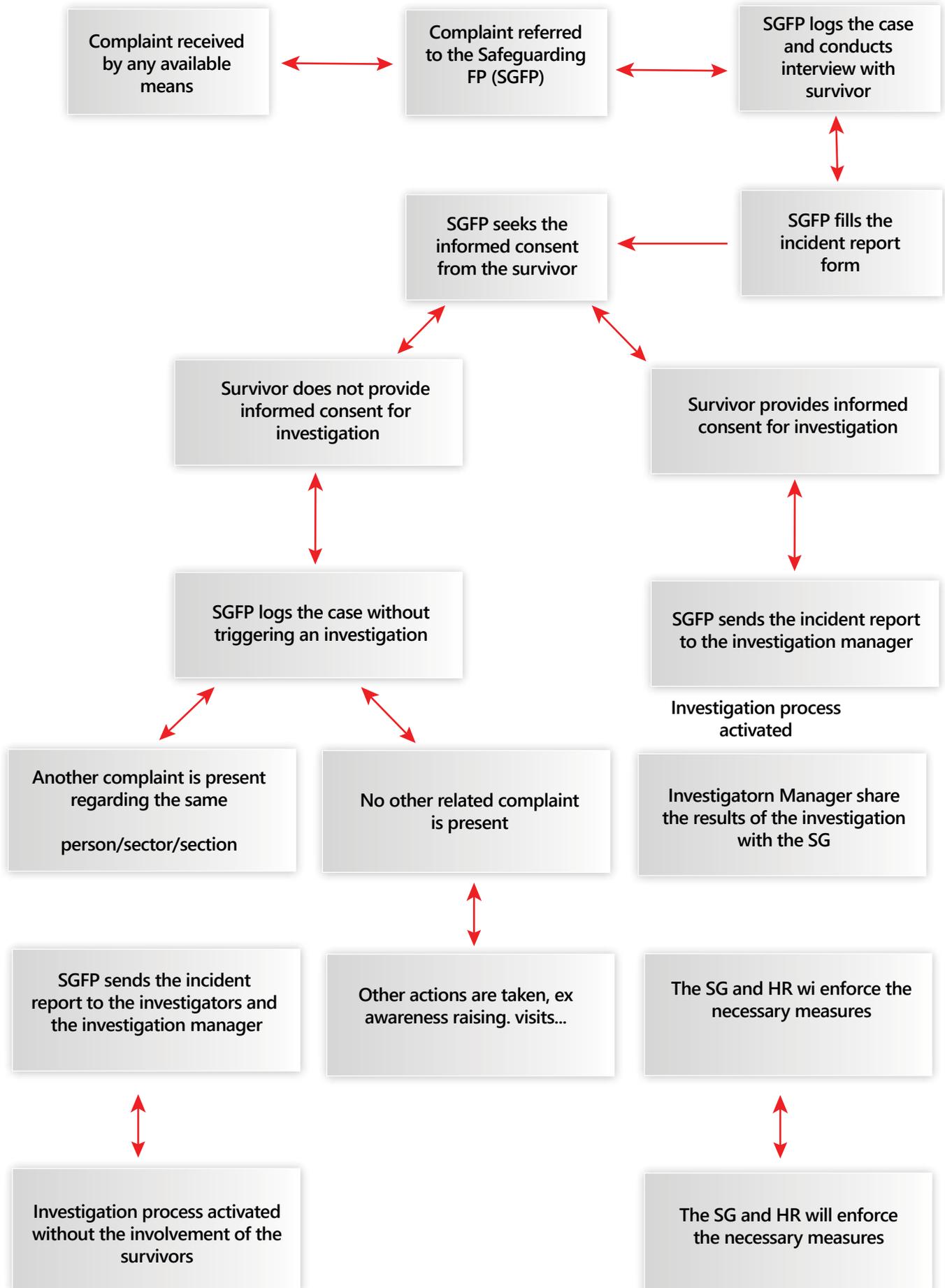
Competencies and Experiences of Committee Members

- Proven integrity, objectivity and professional competence
- Demonstrated sensitivity and knowledge of cultural and gender issues; experience in GBV programming is preferred
- Demonstrated experience of working directly with local communities
- No prior record of PSEA/H complaints

Upon appointment, the committee members will undergo organization-specific training on safeguarding, as soon as feasible.

All SEA/H complaints shall be resolved within 60 days of receiving a complaint/concern.

FLOW CHART



7.6: Accountability Measures

Competent authority will be responsible of reviewing the investigation results and setting the appropriate disciplinary measures to be enforced in accordance with PRCS's policies rules and regulations.

7.7: External Support and Referrals

PRCS has a responsibility to provide any support and conduct referrals to appropriate service providers that any SEA/H survivor might need.

SEA/H survivors have a right to be informed of all available services that they can benefit from such as clinical management of rape or any medical assistance, Mental Health and Psychosocial Support, legal assistance, safe shelter relocation and others.

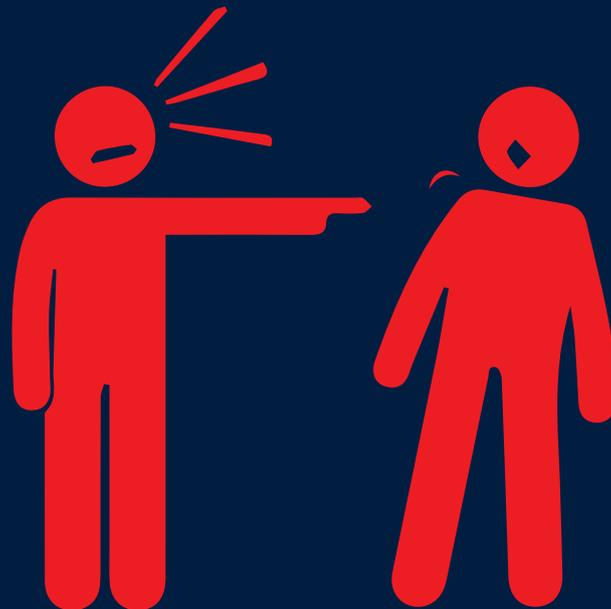
Any linkage or referral that may happen must adhere to the survivor-centered approach and respect all guiding principles mentioned above.

Further, referrals shall require informed consent to be obtained from the survivor before contacting any service provider. The SAFEGUARDING FP will fill out the specified referral form in case the survivor needed to be referred to external agencies.



A L L E G A T I O N

8. FALSE ALLEGATIONS



If a member of staff from PRCS is found to have made an allegation that they knew to be false they will be subject to disciplinary action, up to and including termination of employment.



09. ROLES AND RESPONSIBILITIES

Creating a safe working environment at PRCS is everyone's responsibility and failure to act on concerns or disclosures relating to sexual harassment, abuses and exploitation is not an option.

The governance is responsible for reviewing and updating this Policy periodically, and in line with legislative and organisational developments and hold overall accountability for PRCS's work.

Specific responsibilities applicable to various staff members are as follows:

Roles	Responsibilities
ALL PRCS DEPARTMENTS	<ul style="list-style-type: none">a. Do not investigate or judge the complainant or the case guide the complainant to pass the allegation of SEA to the appropriate persons/committee following the reporting procedures.b. Keep all information shared by the complainant about the allegation strictly confidential.c. Actively work to promote prevention of SEA by conducting risk analysis of operations and programmes through PGI department.d. Complete annual refresher training on PSEA as required by their supervisor.e. Staff new to PRCS must be briefed on PSEA and read and sign PRCS Code of Conduct and PSEA Policy and always abide by the rules.f. Complete the PSEA online course at IFRC training Portal

<p>DEPUTY DIRECTORS/ ASSISTANT DIRECTORS</p>	<ul style="list-style-type: none"> a. Support the PSEA PGI focal point to ensure that staff and volunteers who are aware of, or receive reports of SEA, know how to report it. b. Work to ensure that all staff required to do so complete PSEA refresher training annually, and identify the staff required to do so. c. Ensure all staff are engaged in risk analysis to work to prevent SEA or mitigate risks of SEA in programmes and operations. d. Departments must allocate sufficient budgets in programs and operations to meaningfully address and prevent SEA. They are required to consult on the SEA budget and activities to ensure PGI activities are considered and resourced. Departments remain accountable for compliance. e. Ensure work on PSEA is reflected in the Performance appraisal of all staff.
<p>SAFEGUARDING FOCAL POINT (HOD PGI/ SAFEGUARDING)</p>	<ul style="list-style-type: none"> a. Work towards ensuring that beneficiaries and communities served are sensitized about their rights and obligations regarding PS b. Working with the PRCS PGI working group members, procure or develop relevant communication material informed by the information needs of the community. c. Ensure awareness-raising sessions are conducted for all PRCS staff about PSEA and how to report SEA following the reporting procedures. Ensure the staff are aware of PRCS Whistle-Blower Protection Policy that protects staff making allegations from retribution. d. Ensure PSEA trainings annually. e. Be responsible for ensuring that induction briefings and training on SEA occur and ensuring awareness-raising among staff of their responsibilities to report sexual exploitation and abuse committed by colleagues as well as reporting procedures for allegations of SEA. f. Work with all those who contract PRCS suppliers and contractors to ensure the PRCS Protocol on Allegations of Sexual Abuse and Exploitation Involving service providers is complied with. Ensure that agreements with suppliers and other parties are in line with the Procurement Policy on Special Measures for Protection from Sexual Abuse and Exploitation. g. Ensure any reports received are submitted to Relevant Committee. Also ensures feedback is provided to the complainant if and when needed. h. Keep all information about the allegation strictly confidential. i. Ensure that information and data regarding SEA is adequately protected. j. Understand external referral pathways for survivors/victims of SEA. k. Ensure that the SOPs for reporting SEA for PRCS are in place and updated annually. l. Provincial Branch Secretaries (can be on Zoom or MS Teams) to discuss PSEA, receive support, and for performance review as well as tracking their progress on training staff and their challenges and successes. m. Be responsible for making appropriate recommendations to management on enhancing prevention strategies especially in situations where the volume or type of allegations received indicate that patterns of sexual exploitation and abuse may exist. This could include collecting and analyzing information on actual/potential risk factors for vulnerability to sexual exploitation and abuse and elaborating measures to address these. n. Work with human resource and other relevant personnel on safeguarding related aspects, including ensuring that all personnel sign the code of conduct and that screening for past SEA violations is a regular part of the recruitment process.

<p>Secretary General</p>	<ul style="list-style-type: none"> a. Follow reporting procedures for allegations of SEA b. If and when required ensure responsibilities for PGI focal point are clearly reflected in his/her Performance appraisal and competency evaluation. c. Receive and review twice-yearly reports from the PGI focal point.d) Ensure SEA/H is discussed at senior staff meetings regularly to check progress of trainings, systems etc d. Ensure all staff required to do so receive refresher PSEA training at least annually and that all staff have signed the PRCS Code of Conduct and PSEA Polic e. Ensure programmes and operations conduct risk assessments with respect to SEA in their programmes and operations with the support of the PRCS protection team f. Ensure sufficient budget is allocated to programmes/operations to meaningfully address and prevent SEA. g. Oversee compliance to SEA standards by partners as outlined in the code of conduct and PSEA Policy. h. Send quarterly or biannual communication to staff as a reminder on PRCS Zero tolerance to SEA and need for all staff to attend PSEA trainings.
<p>Procurement</p>	<ul style="list-style-type: none"> a. Ensure that the PRCS Protocol on Allegations of Sexual Abuse and Exploitation Involving suppliers and contactors is complied with in hiring and contracting. b. Ensure that agreements with suppliers and other parties are in line with the Procurement Policy on Special Measures for Protection from Sexual Abuse and Exploitation. c. Ensure compliance with the Procurement Policy on Special Measures for Protection from Sexual Abuse and Exploitation. a. Report any non-compliance to the Secretary General for follow up action.
<p>HUMAN RESOURCES</p>	<ul style="list-style-type: none"> a. Ensure that PSEA training is a mandatory part of new staff induction training with the support of the Safeguarding focal point. b. Ensure job adverts include PSEA commitments. c. Ask questions related to PSEA during hiring interviews/written tests. d. Ensure that all reference checks include a direct question about the candidate's conduct. e. Ensure that new employees sign contracts that include the PRCS Code of Conduct and the PSEA Policy, which is explained to the new employee. f. Ensure all PRCS staff have read and signed the PRCS Code of Conduct and the PSEA Policy. a. Conduct criminal records checks conducted on new employees.

TRAINING PLAN

10. IMPLEMENTATION (INCLUDING TRAINING AND DISSEMINATION)

- Dissemination of policy to sectors, sections, units, program, branches, and PNSs.
- Dissemination of policies to members of the Management Board, provincial governance, branch units, and volunteers.
- All PRCS managers and directors are expected to set an example for the staff and volunteers by behaving impeccably in accordance with this policy.
- All staff, volunteers and members shall sign off this policy and oath of confidentiality through HR.
- Staff and volunteers involved within the complaint and feedback platform shall receive a specific training on PSEA/H and the appropriate reporting procedures.
- The dissemination of this policy and reporting procedures for the public will be done via IEC material (prepared in local languages through service provision activities and in PRCS centers.





AWARENESS

11. AWARENESS RAISING FOR BENEFICIARIES

PRCS's PSEA and Safeguarding policies should be promoted throughout our engagement work with beneficiaries. Feedback from communities on PRCS role, staff behaviours, and complaints should be actively sought.

Staff working directly with affected people must receive training on how to receive complaints and disclosure.

12: Policy Review

This Policy will be reviewed approximately every **2 years** if and when necessary

13: In case of any inconsistency between this policy and the TORs, SOPs, rules, or regulations adopted by PRCS on whistleblowing, the latter (TORs, etc.) shall prevail, provided they are not inconsistent with national law.



T O R

ANNEX 1 – TERMS OF REFERENCE OF THE SAFEGUARDING FOCAL POINT (SGFP)

1. BACKGROUND

Pakistan Red Crescent Society (PRCS) has a zero-tolerance policy towards sexual harassment, exploitation, and abuse. PRCS has developed a PSEA/H policy with a set of procedures to create an SEA/H-free environment for PRCS staff, volunteers, contractors and beneficiaries as well as to promote a safe culture within the national society.

2. SCOPE OF WORK

KEY ROLES AND RESPONSIBILITIES OF SAFEGUARDING FOCAL POINT INCLUDE:

- Manage the development of internal procedures for personnel to report incidents of sexual exploitation and abuse and other safeguarding concerns safely and confidentiality.
- Receive reports of SEA allegations and safeguarding related information and coordinate the response according to relevant procedures.
- Report concerns or issues with safeguarding policy implementation to senior management

RESPONSE TO SEA ALLEGATIONS/SAFEGUARDING CONCERNS

- Once a complaint is received, coordinate PRCS's response, including referral of SEA survivors for immediate, professional assistance and referral of the case for further investigations to the relevant assigned investigators.

OTHER RESPONSIBILITIES

- Coordinate PRCS's PSEA activities with relevant organizations, including inter-agency initiatives, as appropriate.
- Support senior management in implementing other safeguarding related activities, as appropriate.

ANNEX 1: ALLEGATIONS OF SEA – INTAKE FORM

Notes:

- Whoever is filling the form:
 - Please inform the survivor that you have a duty to report all suspected cases of SEA to the designated committee and various channels.
 - Please make sure to fill in the "informed consent to proceed with investigation, to share or to refer" portion of each box (tick yes/no).
 - Please include as much information as possible regarding the survivor, the incident, and the alleged perpetrator.
 - Inform the survivor that anonymous reporting is acceptable.

COMPLAINANT CREDENTIALS:	informed conse: Yes / No
Name of Complainant	
Nationality :	
Contact Details:	
Identity No:	
Year of Birth/Age:	
Place where complainant reported the case:	
SURVIVOR' CREDENTIALS:	
Name of survivor (If different from complainant) (if applicable):	Yes / No
Nationality (if applicable):	Yes / No
Contact Details (if applicable):	Yes / No
Identity No (if applicable):	Yes / No
Year of Birth/Age (if applicable):	Yes / No
Place where complainant reported the case:	
Name and address of parents, if under 18 (if applicable):	

DETAILS OF INCIDENT:

Date of incident:

Time (Morning/Midday/Evening/Night):

Location of the Incident (s):

Brief Description of incident (s) including Specific location, where the incident (s) occurred, and what happened (attach extra pages if necessary):

Witness name and contact information (if available):

ALLEGED OFFENDER'S CREDENTIALS:

Name of the accused person(s) if known:

Job Title (if known):

Agency of the accused (if known):

Nationality (if known):

Nature of Work, in which the accused person is involved (if known):

Address of the accused person (s) (if known):

Age (if known): Sex (if known):

Physical Description of accused person (s):

SURVIVOR ASSISTANCE REQUIRED:

Yes / No

Has survivor requested for any assistance (medical, psychosocial, safety etc):

Yes / No

Any measures taken already:

Yes / No

If yes, has assistance provided already? What type?

What kind of assistance survivor has requested to provide?

Is the provision of assistance needed urgently?

Yes /No

Is the requested assistance available in the place of reporting:

Yes / No

Does the survivor want to receive the feedback of follow-up: Yes/ No

If yes, how? (Ask if through phone or in person, any issues in providing feedback etc.)

Report completed by:

Signature:

Date:

Position (if applicable):

Organization (if applicable):

Contact details (if applicable)

Has the complainant or Survivor been informed about the organizations procedures for dealing with complaints? Yes /No

Signature of complainant signaling details provided in the form are correct, and agrees with where consent is given to share details:

REFERAL DETAILS:

Any other observations recorded by complaints receiving person:

Priority (as per complaint recording person's observations):

High Medium Low

Sent from:

Sent to:

Date:

Time:

Received by:

Annex 4: PRCS PREVENTION AND SEXUAL EXPLOITATION AND ABUSE POLICY ACKNOWLEDGEMENT AND ACCEPTANCE

Mr./Ms/Mrs/Dr/..... Have on this date/...../..... (day/month/year) read and agreed to the PRCS Prevention of Sexual Exploitation and Abuse Policy governing the workplace environment. I understand that a violation of any of these policies may result in disciplinary action, including possible dismissal, as well as civil and criminal liability being taken against me.

Signature.....

Annex 5: Oath of Confidentiality

I, the undersigned, shall exercise the utmost discretion regarding my involvement in the work of recording Sexual Exploitation, Abuse and Harassment allegations. I shall hold secret all information known to me by reason of my activities in my role as a staff of Pakistan Red Cross Society. I shall not use such information for private gain, or to favor or prejudice any third party.

I understand that this declaration will remain in force even after my tenure with Pakistan Red Cross Society comes to an end. I also understand that divulging confidential information to persons who are not authorized to receive it may amount to misconduct, and that the signed original of this declaration will be retained by the HR, and available for any necessary investigation.

Name & Title:

Signature:

Date & Place:



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