



## GP 03

# Policy on Protection from Sexual Harassment, Exploitation, and Abuse (SHEA)

Classification:	Safeguarding Policy
Responsible Authority:	Safeguarding Focal Point, Programs Managers
Executive Sponsor:	Executive Director
Approval Authority:	Board of Directors
Date First Approved:	2021-11-01
Date Last Reviewed:	2023-03-15
Mandatory Review Date:	2025-01-15

## PURPOSE

This policy aims to: Establish mechanisms to prevent all forms of sexual harassment, exploitation, and abuse (SHEA). And to provide practical guidelines on how to respond to confirmed or suspected cases also to foster a safe and respectful environment for all staff, volunteers, partners, and beneficiaries.

SEEN for Gender and Sexual Equity clearly and unequivocally rejects all forms of SHEA. The organization is committed to preventing and responding to SHEA involving anyone connected to SEEN, including staff, volunteers, trainees, trainers, service providers, board members, and community partners.

## SCOPE

This policy sets out the minimum standards required to protect organizational members, beneficiaries, and community members from SHEA.

It applies to all incidents of sexual harassment, exploitation, or abuse, regardless of when or where they occur, provided they involve: Members of SEEN's General Assembly or Board of Directors. ,Employees (full-time, part-time, or contract-based), Volunteers, interns, and trainers, Current and prospective service providers, Partner organizations and sub-grant recipients and any individual under a contractual agreement with SEEN.

The principles of this policy apply at all times, including outside working hours and during leave periods, with no exceptions.

## DEFINITIONS

Word/Term	Definition
Sexual Exploitation	Actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including but not limited to financial, social, or political gain.
Sexual Abuse	Physical intrusion of a sexual nature, or threats of such intrusion, committed by force or under coercive or unequal circumstances. Includes



Word/Term	Definition
	online exploitation. Any sexual relation with a person under 18 years old constitutes abuse, regardless of consent or claimed ignorance of age.
Sexual Harassment	Any unwelcome conduct of a sexual nature — verbal, non-verbal, visual, written, or physical — that creates an intimidating, hostile, or humiliating environment.
Child	Any person under the age of 18 years.

### Forms of Sexual Harassment in the Workplace

- **Physical harassment:** Unwanted physical contact such as touching, hugging, pinching, standing too close, or rubbing against someone.
- **Verbal harassment:** Unwelcome comments about appearance, sexual jokes, sexualized insults, or repeated unwanted remarks.
- **Gestural harassment:** Sexual gestures, suggestive looks, or implied innuendos.
- **Visual harassment:** Displaying pornographic material, sharing explicit images, or sending sexually explicit emails/messages.

### PREVENTION MEASURES

<u>Action</u>	<u>Responsibility</u>
<b>1. Background checks</b>	
1.1 Conduct regular reference checks for all members interacting with beneficiaries, requiring at least two contactable references.	HR And/or Department Leads
<b>2. Interview screening</b>	
2.1 During HR recruitment interviews, ask specific safeguarding-related questions to assess candidates' awareness of SHEA policies.	HR And/or Department Leads
<b>3. Two-stage recruitment</b>	
3.1 Include at least two interview rounds to ensure objectivity and hire the most suitable candidates.	HR And/or Department Leads
<b>4. Mandatory induction</b>	
4.1 All employees, volunteers, and board members must attend an orientation session explaining SEEN's internal policies, Code of Conduct, and SHEA policy, and sign a commitment to comply.	All members
<b>5. Annual performance reviews</b>	
5.1 Assess compliance with SEEN's Code of Conduct, policies, and SHEA principles during annual evaluations.	HR And/or Department Leads and Board
<b>6. Training and support</b>	



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| 6.1 | Ensure all staff and volunteers receive continuous training and support on SHEA policy implementation. | HR And/or Department Leads |
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**7. Complaints mechanism**

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| 7.1 | Establish a safe, accessible complaints system for staff, volunteers, beneficiaries, and partners to report misconduct, exploitation, or abuse of power. | HR And/or Department Leads and Board |
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## COMPLAINT PROCEDURE

Once a victim/survivor or witness submits SEEN's official complaint form, the committee responsible for implementing this policy must immediately take the following steps:

### Action

**1. Initial Actions**

- 1.1 Inform the Chair of the Board and SEEN's legal counsel.
- 1.2 Suspend the accused person (employee, volunteer, trainer, or other) immediately upon report and revoke access to all organizational resources until the investigation concludes.

**2. Investigation Process**

- 2.1 Conduct an internal investigation by interviewing the victim, accused, and any third parties or witnesses.
- 2.2 Meet with the victim within 48 hours of receiving the complaint.
- 2.3 Ensure SEEN's lawyer informs the victim of their legal rights, including the right to file a complaint externally.
- 2.4 Record interviews after obtaining explicit consent. If consent is denied, take detailed notes and seek the victim's approval at the end of the session.

**3. Third-Party and Accused Interviews**

- 3.1 Interview any witnesses, where applicable, with the victim's consent.
- 3.2 Interview the accused person, ensuring either consent for recording or documented written approval of notes.

**4. Reporting and Recommendations**

- 4.1 Prepare a comprehensive investigation report, outlining findings and recommended actions.
- 4.2 If SHEA is confirmed, SEEN must: Support the victim, including legal assistance, psychological counseling, and financial support where necessary. Terminate the perpetrator's contract immediately and without delay.

## SUPPORTING DOCUMENTATION

At the time of writing, no supporting documentation was available.



## **RELATED POLICIES**

Confidentiality and Privacy Policy  
Safeguarding Policy  
Code of Conduct

## **RELATED MATERIALS**

SGSE Mission Statement.  
SGSE Vision.