



SAFEGUARDING POLICY

Prevention of Sexual Exploitation, Abuse, and Sexual Harassment



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INTRODUCTION

The ECPAT International Secretariat works first and foremost to uphold children's rights and commits to act in the best interests of children. ECPAT International respects all human rights, and promotes any person's dignity regardless of age, gender, ethnicity, religion, class, sexual orientation, disability or any other difference and denounces all forms of violence, abuse, and exploitation. These forms of abuse are particularly egregious when committed by staff from agencies and institutions whose key missions, like ours, are to aid, support, and empower people and their communities.

This Policy on the Prevention of Sexual Exploitation, Abuse, and Sexual Harassment (PSEAH) outlines the commitment of ECPAT International to work to prevent sexual exploitation and abuse and sexual harassment against people that we work with and within our working environment. This policy details the concrete preventative and responsive measures that we, as the ECPAT International Secretariat, will take to live up to our responsibility to promote zero tolerance, prevent and address any form of sexual harm against adults (above 18)¹ and children (as detailed in our Child Safeguarding Policy), because of any association or contact with the ECPAT International Secretariat and our work and within our organisation.

This PSEAH Policy provides guidance on the behaviours expected to ensure we protect the people we are in contact with, work with and also promote their well-being. It describes the prevention and education measures we implement, and the way concerns can be raised and will be handled in a timely and appropriate manner. It also outlines the consequences for individuals, organisations and suppliers associated with ECPAT International who do not abide by the PSEAH Code of Conduct and Policy and clarifies the specific actions that ECPAT International will take to ensure robust implementation of the policy.

This policy is informed by the UN Declaration on Human Rights, the Inter-Agency Standing Committee Six Key Principles on PSEA, Core Humanitarian Standards Alliance guidance on PSEAH, and the DAC – OECD Recommendations on PSEA.² Together, these represent current global best practice and minimum standards for policies and procedures to prevent SEAH within the humanitarian and aid sectors.

This policy complements safeguarding concerns against children which are detailed in the ECPAT International Child Safeguarding Policy and Overall Safeguarding Procedures.

1 ECPAT International recognises the definition of a child, as per the UN Convention on the Rights of the Child, to be anyone under the age of 18 years. ECPAT International's Child Safeguarding Policy is to be consulted for safeguarding concerns about anyone under the age of 18.

2 See Annex 1 for a description and comparison of these Global Safeguarding Standards.

(Prevention of) Sexual Exploitation, Abuse, and Sexual Harassment

Preventing Sexual Exploitation, Abuse, and Sexual Harassment is the responsibility that organisations have to make sure sexual misconduct will be prevented and addressed properly when concerning their staff, operations, and programmes. This responsibility to protect includes ensuring that ECPAT International staff and contracted individuals or suppliers³ do not expose anyone in contact with or affected by ECPAT International's work to any sexual misconduct, and that staff and contracted individuals or suppliers report any concerns they may have about someone's safety within the scope of ECPAT International's work.

Why Do We Need a Sexual Exploitation, Abuse and Sexual Harassment Policy?

While there has been much more focus on the issue of sexual exploitation, abuse, and sexual harassment by aid workers since revelations of abuse by aid workers, SEAH remains a serious issue that requires proper attention. Perpetrators may include UN peacekeeping staff, UN agency civilian staff, and staff from international and local non-governmental organisations but also private vendors or government officials and anyone who holds a differential power that can be misused.

Indeed, the inherent power differences between organisations like ours and the individuals and communities we work with heighten the risks of sexual abuse and exploitation or sexual harassment. Similarly, within our own organisation, there can be power dynamics that could place our staff and associated colleagues in position of vulnerabilities and expose them to risks of sexual misconduct. This is why we are committed to creating a protective culture and working environment and putting all reasonable and appropriate measures in place to prevent

any form of sexual harm generated as a result of our organisation's actions to occur, and to timely address and redress harm when it may occur.

As a result of the ongoing risk of sexual exploitation, abuse, and sexual harassment by aid workers against community members, partners but also within the work environment, it is crucial for non-governmental organisations to develop and implement robust prevention policies and procedures. Only by putting in place actions to prevent SEAH, developing confidential and safe mechanisms for reporting concerns when they arise, and having a clear system for responding and following up on concerns, will the scourge of SEAH be properly addressed. Clear and robust prevention and response systems not only protect communities and partners who come into contact with our work and our own personnel; they also protect us against false accusations, and they protect the organisation itself by ensuring it maintains accountability and retains the trust of its staff, communities, other aid agencies, and donors.

³ Staff and contracted individuals or suppliers refer to any individual contracted to work with ECPAT International Secretariat, including staff understood as anyone who is on the ECPAT organisational chart, regardless of the legal arrangements; and any intern, but also consultants, volunteers, Board members, visitors, donors, suppliers as well as implementing partners.

Scope of the Policy on Sexual Exploitation, Abuse and Sexual Harassment

This policy applies to all individuals who are contracted by ECPAT International Secretariat in some manner. This includes, but is not limited to, ECPAT International Secretariat staff including interns,⁴ consultants, volunteers, members of the Board, visitors, implementing partners, and suppliers.⁵ Throughout this policy, they are referred to as ECPAT staff, contracted individuals, or suppliers. This policy and its central component, the PSEAH Code of Conduct, applies to ECPAT staff and contracted individuals or suppliers during and outside of working hours, while at the office, ECPAT events, or during travel, and as long as they are contracted by ECPAT International.

Organisations which are official members of the ECPAT International network are not directly bound by this policy unless they are in a contractual relationship with the ECPAT International Secretariat. Nevertheless, it is recommended that ECPAT members develop and implement equivalent standards for safeguarding vulnerable adults.

While ECPAT International does not intend to dictate to anyone how to conduct their personal lives, **we expect anyone associated with our organisation to respect our values and principles to prevent any form of sexual misconduct.** Any action reported in contradiction with this policy during and outside of working hours will be considered as a violation of this policy and may result in disciplinary measures for staff or termination of contract for contracted individuals or suppliers.

The PSEAH Policy is accompanied by PSEAH Procedures which detail the practical actions that the ECPAT International Secretariat will take to ensure robust and consistent implementation of the policy.

While we tried to make this PSEAH Policy as comprehensive as possible, given the diverse range of settings and programmes implemented by the ECPAT International Secretariat and the large partnership that we nurture, there may be circumstances which are not foreseen or covered in this policy, or questions about the implementation of the policy and its related measures. In these cases, ECPAT staff and contracted individuals or suppliers should refer to their supervisor, point of contact or to the ECPAT International Safeguarding Focal Point for further advice.

Failure to understand what to do should not be an excuse for inadequate implementation of the PSEAH Policy.

ECPAT recognises that there are concerns which are outside the organisation's control.

For example, ECPAT staff and contracted individuals or suppliers and others may witness SEAH concerns in their wider community, such as sexual harassment of women by other people in their community. While recognising that ECPAT staff and contracted individuals or suppliers are understandably sensitive to these wider 'external' concerns, they are outside the direct control of ECPAT, and as such are not covered by this policy. It is, however, necessary to ensure ECPAT staff and contracted individuals or suppliers are able to report their concerns to the local existing service providers or authorities. The ECPAT International Safeguarding Focal Point or supervisors may be able to support in this regard, but these concerns will not be recorded as concerns covered under this policy.

⁴ ECPAT staff is anyone who is on the ECPAT organisational chart, regardless of the legal arrangements; and any intern.

⁵ A supplier is any company or agency that is contracted to provide a service to the organisation.

Our Commitments

ECPAT International's vision is to bring about the elimination of sexual exploitation of children, and to encourage the world community to ensure that children everywhere enjoy their fundamental rights free and secure from all forms of sexual exploitation. This policy outlines our commitment to apply strong ethical, moral, and legal principles in all the work that we do.

We believe in putting children's and adults' rights and safety at the heart of our mission, and the best interests of the individuals and communities we work with should always be our primary consideration. We are committed to actively combatting discrimination of all

kinds, as well as working to eliminate other forms of inequality and harmful practices, while respecting the diverse cultural makeup of ECPAT International and its associated members and partners.

As an organisation, we are committed to taking concrete steps to develop an evolving safeguarding culture and to ensure robust safeguarding measures are in place to protect the children, communities and staff we and our partners are in contact with through our work.

ECPAT International Guiding Principles for the Prevention of Sexual Exploitation, Abuse, and Sexual Harassment

1. Sexual exploitation and abuse and sexual harassment by ECPAT International staff and contracted individuals or suppliers constitute acts of gross misconduct and are therefore grounds for disciplinary actions and/or termination of contract within the applicable and current regulations.
2. Any sexual activity involving children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is never a defence. The ECPAT International Child Safeguarding Policy and Procedures states the principles and actions for ensuring child safeguarding in all domains of ECPAT International.⁶
3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour, with anyone associated with or affected by our work is prohibited. This includes the exchange of assistance that is due to caregivers and community members we work with.
4. Sexual relationships between ECPAT staff and contracted individuals or suppliers, and beneficiaries and members of the community, are strongly discouraged since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of the work of ECPAT International. In case of a possible romantic relationship, this should be immediately communicated to the supervisor for transparency and accountability by the persons concerned.
5. Where an ECPAT International staff member and contracted individual or supplier develop concerns or suspicions regarding sexual misconduct by a fellow staff member or contracted individual or supplier, whether the individual works for ECPAT International or for an ECPAT member, partner, supplier or other stakeholder, that person must report such concerns through the ECPAT International safeguarding reporting mechanism. The Board must be informed by the Executive Director of all incidents which have been assessed by the Safeguarding Focal Point to amount to a breach of the ECPAT International PSEAH policy.
6. All ECPAT International staff and contracted individuals or suppliers are obliged to create and maintain an environment that prevents sexual exploitation, abuse and sexual harassment and promote the implementation of the PSEAH Code of Conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this organisational environment.

Other principles guiding our actions include the central humanitarian principles to **'Do no harm'** and work to minimise the risks of harm we might inadvertently cause as a result of our actions as an organisation. We take a **survivor-centred approach** to report safeguarding concerns, meaning that we will engage with victims and survivors in a way that prioritises their needs, safety, rights and well-being, and we will take necessary measures and allocate adequate resources to respond to reported concerns. As an organisation, we are **responsible and accountable** for our actions. We believe that **everyone has a responsibility to prevent** sexual exploitation, abuse, and sexual harassment, not just designated staff, and we will act in a manner that is transparent. We will **monitor progress and compliance** toward meeting our PSEAH commitments and we will **work in partnership and collaboration**, recognising that we have a responsibility to support our members and partners in meeting minimum requirements to protect vulnerable adults.

⁶ See ECPAT International Child Safeguarding Policy and ECPAT International Overall Safeguarding Procedures.

Definitions

PSEAH: Prevention of Sexual Exploitation, Abuse, and Sexual Harassment is defined as the actions and commitments an organisation takes to safeguard all individuals with whom the organisation and its staff and contracted individuals or suppliers come into contact with. While recognising that there are numerous other risks related to sexual exploitation, abuse, and harassment that women and other vulnerable individuals face in their communities on a daily basis, the term PSEAH refers specifically to the preventative and proactive actions an aid agency takes to prevent and respond to sexual misconduct committed by its own staff and contracted individuals or suppliers.

Sexual Abuse:⁷ Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with a child is considered as sexual abuse (refer to ECPAT Child Safeguarding policy). “Physical intrusion” is understood to mean “sexual activity” (i.e., Physical contact of a sexual nature). “Sexual abuse” is a broad term, which includes a number of acts described below, including “rape”, “sexual assault”. This means that physical force is not necessary for sexual abuse to be considered. Such an act may also occur in situations where apparent consent has not been given, in situations of inequality, psychological pressure or coercion. Consent to drink alcohol or use drugs must not under any circumstances be considered consent to sexual activity and in no way diminishes the perpetrator’s responsibility.

Sexual Exploitation:⁸ 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 can happen within

the context of adult sex work and within the context of production of pornography with adults. This means that exploitation can also occur when an individual is an intermediary for the abuse. Exchange of money, employment, goods or services for sex, including sexual favours and any forms of humiliating, degrading or exploitative behaviour, are prohibited by this policy, regardless of the legal environment where ECPAT operates.

Sexual harassment:⁹ refers to prohibited conduct in the work context and can be committed against staff and related personnel. In the context of ECPAT International, sexual harassment primarily describes prohibited behaviour against another staff member or related personnel, which may include people working with other NGOs or other partners. It involves any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile, or offensive work environment.

Harassment is defined as “a range of unacceptable behaviours and practices, or threats thereof, that result in or are likely to result in physical, psychological, sexual or economic harm...” (ILO C190 Violence and Harassment Convention). Harassment is underpinned by abuse of power and is experienced differently for people with different and intersecting identity characteristics. Having measures in place to protect staff – and others who interact with us – from all forms of harassment is important. For our staff, this is more specifically addressed in our Human Resource policy.¹⁰

7 United Nations (2017, Jul). [Glossary on Sexual Exploitation and Abuse: Thematic Glossary of current terminology related to Sexual Exploitation and Abuse \(SEA\) in the context of the United Nations](#). Second Edition.

8 UN Secretary-General (2003, Oct). [Secretary-General’s Bulletin: Special Measures for Protection from Sexual Exploitation and Sexual Abuse ST/SGB/2003/13 \[EN/SK\]](#).

9 UN Secretary-General (2003, Oct). [Secretary-General’s Bulletin: Special Measures for Protection from Sexual Exploitation and Sexual Abuse ST/SGB/2003/13 \[EN/SK\]](#).

10 Safeguarding Support and Resource Hub (2021, Jun). [How to apply global standards on Sexual Exploitation, Abuse and Sexual Harassment](#).

PREVENTION ACTIONS THAT ECPAT INTERNATIONAL WILL TAKE

Safeguarding against sexual exploitation, abuse, and sexual harassment is everyone's responsibility across the organisation.

Promoting the Policy and a culture of zero tolerance to sexual exploitation, abuse and sexual harassment

To be effective, it is important that ECPAT International promotes and communicates its strong commitment to a culture of zero tolerance to any form of sexual exploitation, abuse and sexual harassment clearly. This is a way to show ECPAT International will not tolerate any form of sexual exploitation, abuse and sexual harassment perpetrated by an ECPAT staff or contracted individual or supplier. ECPAT International will proactively communicate that these behaviours are unacceptable for anyone associated with our organisation, whether this occurs as part of our activities or in a private context, and even when they are not necessarily fully prohibited by local legislation.

It is important for the communities and partners, that ECPAT International works with to understand and know that ECPAT International has a PSEAH Policy and a PSEAH Code of

Conduct that outlines expected behaviour, so that they know what they can expect from someone representing ECPAT International who engages with them. It is important that they also can report any PSEAH concerns regarding the behaviour of ECPAT staff and contracted individuals or suppliers easily.

In our activities, we will provide a link to our PSEAH policy on the website. We will mention our PSEAH policy and commitments in all job advertisements, and the policy will be attached to all contracts. We will develop a pictorial/non-verbal version of our PSEAH Code of Conduct, and disseminate this information, along with guidance on how to report concerns, to all partners and community members we engage with prior to participation in any activity. ECPAT team leaders and managers will include PSEAH as a standing agenda item in staff meetings.

Recruitment and Procurement

ECPAT International takes certain measures to prevent that staff and contracted individuals or suppliers who may pose risks to vulnerable communities cannot be engaged with us or have facilitated access to such vulnerable communities through ECPAT, our programmes, or where we operate. The procedures for safe recruitment and screening of ECPAT International staff and contracted individuals or suppliers aims to reduce the risks of engaging persons with a work history of sexual misconduct or a criminal history of abusing

vulnerable individuals and reduce or eliminate the risk of contracting services from suppliers associated with sexually abusive activities. ECPAT International puts in place measures including background checks and criminal history checks. Please refer to the ECPAT International Overall Safeguarding Procedures for more detailed guidance on ensuring safe recruitment of staff and contracted individuals or suppliers. This guidance should be adapted to cover concerns regarding vulnerable adults.

Prevention of Sexual Exploitation, Abuse, and Sexual Harassment Code of Conduct

The PSEAH Code of Conduct articulates ECPAT International's expectations of the behaviours and actions of ECPAT staff and contracted individuals or suppliers when engaged with the organisation, both inside and outside working hours.

The ECPAT International PSEAH Code of Conduct, which forms a central part of this policy, expresses the fundamental values which guide our behaviours to ensure we do not harm any individuals we come into contact with through any of our actions. While recognising and following national legislation, the ECPAT PSEAH Policy is an internal standard which may include higher expectations for ECPAT staff and contracted individuals or suppliers than what is regulated in national laws.

It is mandatory for all ECPAT staff and contracted individuals or suppliers to always follow the PSEAH Code of Conduct. Any staff and contracted individuals or suppliers who are found to be in breach of the PSEAH Code of Conduct will face disciplinary measures, up to and including dismissal from the organisation or termination of the agreement, and referral to local authorities, if necessary.

As preventing sexual exploitation, abuse and sexual harassment is everyone's responsibility, it is mandatory for all ECPAT staff and contracted individuals or suppliers to report any SEAH concerns they see, observe, or become aware of involving ECPAT staff or contracted individuals or suppliers. All concerns should be reported, even if they amount only to a suspicion, a rumour, or simply a feeling that something is not right. Staff and contracted individuals or suppliers should not seek to 'investigate' the concern themselves, instead sharing all concerns with the ECPAT International Safeguarding Focal Point. Failure to report a concern can result in disciplinary measures.

The ECPAT International PSEAH Code of Conduct is central to the ECPAT International PSEAH policy and always has to be read together with the full policy document.

Training of ECPAT Staff and education of contracted individuals and suppliers

In order for the ECPAT International PSEAH Policy to be properly implemented, it is essential that all ECPAT staff and contracted individuals or suppliers are properly informed about our commitments and our reporting mechanisms.

ECPAT Staff will receive induction and annual training by the Safeguarding Focal Point on:

- The nature and definition of PSEAH and power imbalances.
- The content and mandatory nature of the policy.
- The behaviours outlined in the PSEAH Code of Conduct.
- The importance of immediately reporting all concerns through the ECPAT International Safeguarding Concern Reporting Mechanism.
- The role of the PSEAH Focal Point, how to access support and the consequences for non-compliance with the policy.

Individuals or suppliers contracted by ECPAT International will be informed, verbally or in writing, of our PSEAH policy, commitments and reporting mechanisms, which will be included in all contracts.

Upon recruitment or contracting, all staff and contracted individuals or suppliers will receive the PSEAH Policy to read and the PSEAH Code of Conduct to be signed prior to starting engagement with ECPAT International. Signed Codes of Conduct forms will be kept in the respective recruitment or selection file, following the same procedures as outlined in the Overall Safeguarding Procedures.

Working in partnership with ECPAT members and partners

ECPAT International is a network of member organisations working to end child sexual exploitation all over the world. ECPAT International is committed to ensuring all ECPAT members and partners receive the support needed to develop their own safeguarding and/or PSEAH policies and procedures.

Because the ECPAT International Secretariat PSEAH policy is not specific to the member organisation's own risks, it is a requirement for the ECPAT network that every member develops their own PSEAH Policy, offering the same

standards of protection as this one. Member organisations have the best understanding of what the potential PSEAH risks in their own programmes, activities, and environments would be. ECPAT International will provide technical support and guidance to members on how to conduct their own risk assessments and develop their own policies and procedures, suited to their purpose and meeting the values and mission of their own organisation, as needed.

MANAGEMENT RESPONSIBILITIES

Safeguarding Focal Point

An ECPAT International Safeguarding Focal Point will be appointed and appropriately trained and supported to implement both the child safeguarding and PSEAH policies and procedures. Child safeguarding concerns are detailed and should be addressed within the frame of the child safeguarding policy. All safeguarding concerns should be reported to the Safeguarding Focal Point immediately; alternatively, staff may share the concern with their immediate supervisor, who will then share it with the Focal Point.¹¹ It is important to keep in mind that confidentiality is a key principle of safeguarding; for that reason, details of the

concern must only be shared with those who have a need to know. While it is everyone's responsibility to comply with the PSEAH Code of Conduct and Policy, the Safeguarding Focal Point will work with senior management and team leaders to monitor implementation of the policy. The Focal Point is also ECPAT International's technical advisor for anything related to child safeguarding and PSEAH and will be responsible for organising trainings. The Focal Point will coordinate with and support HR for any matters related to safe recruitment and induction training for new staff.

¹¹ Except if the concern has to do with the Safeguarding Focal Point – in this case, the information is escalated directly to the senior management.

ECPAT Managers

One of the most important responsibilities of managers is to model, through leadership, a culture of 'zero tolerance' for any type of behaviour which violates the PSEAH Code of Conduct. This should be done by encouraging open discussion of PSEAH and supporting the reporting of PSEAH concerns. PSEAH and safeguarding in general should be standing agenda items for senior management team meetings.

Ultimately, accountability for safeguarding rests with the Executive Director. This is from a legal,

ethical, and leadership perspective. The Executive Director is therefore included in all important information regarding concerns that are reported which rise to the level of an identified incident.¹² The Executive Director is the individual responsible for communicating with the Board and sharing information with donors, based on donor requirements for such.

Detailed responsibilities of managers and team leaders, and a TOR for the Safeguarding Focal Point, can be found in Annex 7, Safeguarding Focal Point.

¹² Except if the concern has to do with the Executive Director - in this case, a special procedure will apply to engage with the Board directly.

REPORTING AND RESPONDING TO CONCERNS OF SEXUAL EXPLOITATION, ABUSE AND SEXUAL HARASSMENT

A Survivor-Centred Approach

A survivor-centred approach prioritises the rights, needs, wishes and empowerment of survivors of sexual exploitation, abuse and sexual harassment in both the prevention of and response to SEAH. In practice, this means that ECPAT International needs to ensure that:

- Those who are affected by SEAH have access to complaint mechanisms which are designed with their needs and context in mind;
- SEAH complaints are investigated sensitively and confidentially, with a primary concern for the survivor;
- Any response is both robust and sensitive to the wishes and protection of survivors.

What does a survivor-centred approach look like in practice?¹³

It is particularly important that, where the complainant is a beneficiary, the person receiving the complaint considers whether the beneficiary has ongoing needs requiring protection or assistance. There may be

immediate safety needs if the beneficiary is returning to an unsafe situation, or immediate health and psychological needs, particularly if there was a risk of transmission of disease. As your organisation is responsible for the action of your staff, volunteers and those who represent you, every effort must be made to ensure that any survivor of sexual exploitation or abuse is provided with the necessary means for protection and rehabilitation, even if the complaint is not covered by the scope of your policy or organisation. This will generally involve referral to other organisations able to address these needs. In contrast, an approach that does not centre the survivor at its core would only provide referrals and assistance where the complaint falls within the scope of the organisation's policy.

The Importance of a survivor-centred approach is also recognised in the OECD DAC Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance adopted in July 2019.

¹³ Australian Council for International Development. [Guidance for the Development of a Prevention of Sexual Exploitation, Abuse and Harassment Policy](#).

Consultation with staff and primary stakeholders on mechanisms

The ECPAT International Secretariat generally does not have much regular interaction with community members and beneficiaries. For organisations which have more regular contact with individual beneficiaries and community members, it is important to consult with those communities when designing the community reporting mechanism.

ECPAT International seeks to involve staff in the development of appropriate complaint mechanism. As this policy is rolled out, feedback from various stakeholders will be used to inform future revisions to the ECPAT International PSEAH Policy.

Reporting concerns¹⁴

It is mandatory for all ECPAT staff and contracted individuals or suppliers to report **within 24 hours** any concerns they may have related to sexual exploitation, abuse, and sexual harassment involving ECPAT staff and contracted individuals or suppliers. In the ECPAT International PSEAH Policy, a concern is defined as “A matter that causes feelings of unease, uncertainty, or apprehension”. **It is not the responsibility of the person reporting to determine the nature or extent of a PSEAH concern – this is the role of the ECPAT International Safeguarding Focal Point.**

If a staff member has any questions or doubts about something which is causing them concern, they should seek the guidance of the Safeguarding Focal Point.

The key point is that everyone associated with ECPAT International Secretariat, whether staff and contracted individuals or suppliers, should report **anything** that appears to be a concern related to SEAH. ‘When in doubt, report!’. Taking a proactive approach to combatting SEAH is an underlying principle of ECPAT International’s approach to preventing SEAH.

¹⁴ For further detail on procedures for reporting and responding, refer to Annex 8 of the PSEAH Policy.

Responding to Disclosures

If someone becomes aware of a safeguarding concern, the safety and welfare of the person who is suffering or at risk of harm should always be a first priority. ECPAT International will provide guidance in its training and education

activities on how to deal with disclosure, making sure that anyone engaged with ECPAT International is informed and supported to adequately listen and receive disclosure, and will know how to react and how to report the case based on our reporting mechanism.

Responding to Concerns

The ECPAT International Secretariat takes all PSEAH concerns very seriously and takes a survivor-centred approach to preventing harm and assisting victims and witnesses.

Concerns will be initially assessed and responded to by the ECPAT International Safeguarding Focal Point. This includes assessing if the concern may refer to an incident of PSEAH where a programme beneficiary, partner or a staff may have been harmed or is at risk of being harmed. If the Safeguarding Focal Point receives information indicating that the 'concern' has escalated to an actual 'incident' involving ECPAT International staff or a contracted individual or supplier, this information will be immediately shared with the Safeguarding committee. This Safeguarding committee will need to be established in advance and will be likely composed of the Executive Director, Human Resource Director

and Safeguarding Focal Point. Concerns will be managed based on developed practices, including referral of the victim to external services, and reporting the incident to the relevant authorities when there is a suspicion that a criminal offence has occurred. All reports made will be treated seriously and addressed with utmost confidentiality at every stage.

The Executive Director will brief the Board on the general outlines of the reported incident. Specifics of the incident will only be shared on a 'need to know' basis with minimum detail. The Executive Director and the Board will be involved in approving an external investigation to be conducted, if needed. They will be kept regularly updated on the progress of reported incidents and investigations. The Safeguarding Focal Point will be responsible for referral, cooperating with the external investigator, and monitoring the condition of the victim. Further detail on raising concerns and responding can be found in the Annexes 8 & 9 of this Policy, Procedures for Reporting and Responding.

Disciplinary Actions¹⁵

Disciplinary actions to be taken in case of violation of the PSEAH Code of Conduct will be discussed with the Safeguarding committee and ECPAT staff members directly to agree on temporary measures such as paid administrative leave during the investigation or suspension of contract in case of a contracted individual or supplier. The person concerned will be officially requested to cooperate with the external investigator, most likely external to our organisation. Once the investigation is complete, the findings will be discussed by the Safeguarding committee with the investigator.

The ECPAT Safeguarding committee will then decide on final disciplinary measures. If it has

been confirmed that there has been a breach of the PSEAH Policy or Procedures, this will lead to disciplinary procedures which may involve termination of contracts or other consequences. If it appears the case is related to a criminal offense, referral to the appropriate justice system will be made.

ECPAT International will ensure that no punitive action will be taken against those who report concerns in good faith as per our Whistleblowing Policy. However, anyone who wilfully reports using false information may be subject to possible consequences as per disciplinary procedures.

¹⁵ More detail on disciplinary measures will be incorporated into the ECPAT International Human Resources manual.

MONITORING AND REVIEW

Monitoring

Accountability goes hand in hand with PSEAH. ECPAT is committed to ensuring that this policy is adequately implemented through a range of measures and will monitor, learn and reflect on

the implementation of these measures. This is a critical part of ensuring our accountability to the individuals and communities we work with and for.

Review

This policy will be reviewed every three years, or earlier if circumstances necessitate. An example of this is the COVID-19 global pandemic, which necessitated numerous programmatic changes for organisations worldwide.

The review of the PSEAH Policy will be conducted through active participation of staff.



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