

## **Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy**

### **The Policy Statement**

FutureSense is committed to providing a safe environment for everyone engaged by its programmes and activities.

FutureSense has a zero-tolerance policy for any form of exploitation, abuse, and harassment, and will treat all incidents seriously and promptly by investigating all such allegations. Any person found to have behaved in an inappropriate manner or violated this policy will face disciplinary action, up to and including dismissal from employment, termination of the volunteer programme and/or termination of the partnership and possible legal persecutions under local laws.

FutureSense recognizes that anyone can be a victim of sexual exploitation, abuse, or harassment, regardless of their gender and the gender of the harasser. Recognizing that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships.

All claims will be taken seriously and treated with empathy, respect, and in confidence.

This policy aligns with and complements the FutureSense Safeguarding policy, Social Media Policy and Whistleblowing policy.

### **Who policy applies to**

This policy applies to all 'representatives and individuals engaged with FutureSense Foundation' and its work. This refers to all staff, interns, volunteers, programme participants, contractors, consultants, trustees, advisors, visitors, and partner organisations.

### **Definitions**

Sexual exploitation: Any actual or attempted abuse of power for sexual purposes. Including profiting financially, socially, or politically from the sexual exploitation of another. Sexual exploitation includes using a position of power to pressure or force someone into doing something against their will, by threatening them with negative repercussions.

Sexual abuse: The actual or threat of physical intrusion of a sexual nature. Including actual or attempted rape or non-consensual sexual activity, such as non-consensual oral sex, touching or kissing. All sexual activity with a person under the age of consent is considered sexual abuse.

Sexual harassment: Unwelcomed sexual advances and conduct, which makes the other person feel offended, sexually objectified, humiliated and/or intimidated.

Sexual harassment can involve one or more incidents, and actions constituting harassment can occur in the form of physical, verbal, and non-verbal. Below are examples of conduct or behaviour, which constitute sexual harassment.

#### *Physical conduct*

- Unwelcome physical contact including patting, pinching, poking, stroking, kissing, hugging, fondling and other inappropriate touching
- Physical violence, including sexual assault
- The use of job-related or power-related threats, rewards, and rule setting to solicit sexual favors or subject an individual to a sexually demeaning act.

#### *Verbal conduct*

- Comments on someone's appearance, age, private life, etc. (including suggestive comments related to their own appearance, private life, age etc.)

- Sexual comments, stories, and jokes
- Verbal sexual advances and/or requests for sexual favors
- Repeated and unwanted social invitations for dates or physical intimacy
- Derogatory comments and/or insults related to the sex, physical appearance, private life, etc. of the individual
- Condescending or paternalistic remarks
- Sending sexually explicit material

*Non-verbal conduct*

- Display of sexually explicit or suggestive material
- Non-verbal sexual advances or suggestions, such as winking, whistling, gestures and poses
- Derogatory and/or suggestive behaviour
- Leering
- Displaying favoritism or increased inappropriate attention to one individual due to sex, physical appearance, age etc.

**Policy Principles**

- 1) Zero tolerance for any form of sexual exploitation, abuse or harassment. Including physical, verbal or non-verbal conduct and cannot be justified on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
- 2) To eliminate sexual exploitation, abuse and harassment caused by power imbalances all FutureSense representatives are prohibited from engaging in all forms of transactional sex or in sexual relations with any existing or potential programme beneficiary, or with anyone else where the relationship could be used to exert power, favours or otherwise exploitative behaviour.
- 3) Preventing sexual exploitation, abuse and harassment is everyone's responsibility and inaction when it comes to reporting and/or investigating is unacceptable. We ensure everyone engaged with our programmes are aware of our policies and their rights and responsibilities, and acknowledge our responsibility to ensure that our partners uphold this standard.
- 4) Sexual exploitation, abuse and harassment can take many forms ranging from tasteless jokes and gestures to threatening behaviour and physical abuse. Whatever form it takes, it is always unacceptable and treated as a serious violation of FutureSense policies.
- 5) Sexual exploitation, abuse and harassment can occur in a number of settings, and can despite the setting, form or severity seriously affect the survivor's health and wellbeing. FutureSense is therefore committed to ensuring the immediate safety and wellbeing of survivors followed by thorough investigations of the allegations.
- 6) This policy shall be followed at all times by all active FutureSense representatives. Including before, during and after programme activities, at work or field trips, at trainings and meetings, and social events regardless of them happening after hours and in the representative's free time.

**Reporting and Investigation Processes**

Throughout the reporting and investigation process, whether formal or informal, a survivor is entitled to be supported through the process by someone they trust and can follow the procedures to accessing any additional resources necessary.

FutureSense recognizes that because sexual exploitation, abuse and harassment often occurs in unequal relationships, survivors often feel that they cannot come forward, and therefore understands the need to support survivors in reporting on incidents. Recognizing that there may be

instances in which the survivor does not feel safe to report the incident to the in-country team. In such instances the survivor can directly report it to the Global Management team by emailing [Safeguarding@futuresensefoundation.org](mailto:Safeguarding@futuresensefoundation.org) or by directly contacting the CEO of the foundation.

FutureSense recognizes the importance of staying unbiased, hearing the full claim of the individual involved and supporting them through empathy, by assisting the individual with finding the appropriate means of lodging a complaint and finding options for counselling support.

FutureSense requires, that;

- All incidents are reported to a team member to be forwarded to FutureSense's Global Management team overseeing Safeguarding matters within 24 hours ([Safeguarding@futuresensefoundation.org](mailto:Safeguarding@futuresensefoundation.org))
- The report is reviewed and further reported on to relevant FutureSense entities and partners within the following business day. Subject to critical review to maintain confidentiality and safety of all individuals involved.
- All local entities further informs their relevant local partners of the report as per instructions given by the Global Management team.
- All claims are fully investigated in a manner that maintains the confidentiality, safety and right to fair treatment of the individuals involved.
- Any accused individual is immediately transferred to other duties that does not involve working with other people for the entire duration of the investigation.

#### ***Informal reporting & investigation process***

- FutureSense recognizes that reporting on incidents of sexual exploitation, abuse and harassment is of a sensitive and intimate nature and that the survivor may not feel comfortable to raise the issue through the normal reporting processes and channels. In such cases the individual is encouraged to raise the matter with a senior colleague or team leader of their choice (whether or not that person has a direct supervisory responsibility for them) as a confidential helper.
  - The confidential helper cannot be the in-country manager to avoid any conflict of interest should the matter be escalated to the formal reporting and investigation process where they would become responsible for the investigation.
- If the individual has been subjected to a minor incident and wishes to handle the matter outside of a formal reporting and investigation process the individual is encouraged to verbally acknowledge to the perpetrator that they wish a specific behaviour to stop. If they are unable to do this, they should follow the formal reporting and investigation process.
- Should an individual report an incident to a FutureSense staff member they will be made aware of the reporting and investigation process, their right to confidentiality and safety during the process. Should the individual wish to not make a formal report for a formal investigation at this stage, they will be informed that this must be formally documented. They will also be made aware that all incidents brought to the attention of FutureSense will always result in an internal investigation regardless.

#### ***Formal reporting & investigation process***

If the claimant wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome, the formal complaint mechanism should be used to resolve the matter.

- A manager or senior representative, either in-country or elsewhere, will always carry out any formal investigation. They will also ensure that the alleged perpetrator is removed from any situations coming into contact with the claimant or anyone else they could pose a risk to throughout the duration of the investigation.

- The person investigating the complaint will invite the claimant to attend a meeting, at a reasonable time and location, to discuss the matter and carry out a thorough investigation. The claimant has the right to be accompanied at such a meeting by a confidential helper or person of their choice and the claimant must take all reasonable steps to attend. Those involved in the investigation will be expected to act in confidence and any breach of confidence will be a disciplinary matter.

The person carrying out the investigation will:

- 1) Ensure that the claimant understands the reporting and investigation process.
  - 2) Ensure the claimant is aware of possible options to seek external support or counseling as a personal support during the process.
  - 3) Ensure that the alleged perpetrator understands the reporting and investigation process.
  - 4) Gather statements from the claimant and the alleged perpetrator separately. These statements must be recorded, signed, and witnessed immediately upon gathering.
  - 5) Gather any other relevantly deemed third party statements separately.
  - 6) Produce a report detailing the investigations, findings, and any recommendations
  - 7) Discuss the report with their senior manager and decide what the appropriate remedy and/or sanctions are.
  - 8) Communicate the decisions to the complainant and alleged perpetrator and explain actions as required.
  - 9) Follow up to ensure that the recommendations are implemented and have been successful in stopping any further violation of this policy.
  - 10) Keep a record of all actions taken, outcomes, and recommendations. They must ensure that the all records concerning the matter are kept confidential.
- The formal reporting and investigation process should be done immediately, with a formal report written no later than within 48 hours of the incident having been raised. The written formal complaint should contain the following:
    - 1) the name of the alleged perpetrator
    - 2) the nature of the alleged incident
    - 3) the dates and times when the alleged incident occurred
    - 4) the names of any witnesses; and
    - 5) any action already taken by the claimant to stop the alleged incident
  - Should there be any concerns the investigating manager has failed to properly investigate a reported incident, the matter should be escalated to the CEO followed by the Chair of the Board of Trustees.

### ***External reporting & investigation process***

A person who has been subject to sexual exploitation, abuse, or harassment can also report on the incident externally through representative bodies or a legal institution. FutureSense treats all reported incidents with the utmost seriousness and will always comply with investigations in accordance with this policy, regardless of their internal or external nature.

### **Sanctions and disciplinary measures**

Anyone who has been found to have violated the terms of this policy will face appropriately deemed consequential sanctions out of the below;

- Performance evaluation
- Verbal or written warning
- Suspension or dismissal

- Termination of programme, project, or visit
- Termination of contract
- Termination of partnership
- Legal persecution under local laws

The nature of the sanctions will depend on the gravity and extent of the violation.

Suitably determined sanctions will be implemented to ensure that incidents are treated seriously.

Some sanctions may be taken as an immediate measure, while others will be subject to investigation, for example, an immediate suspension subject to a potential dismissal following an investigation.

### **Implementation of this policy**

- FutureSense ensures that this policy is widely disseminated to all relevant persons.
- FutureSense is committed to ensuring all individuals engaging with its programmes and activities demonstrate a clear national working with children's check, a police check and a personal reference check. FutureSense does not knowingly recruit or engage with individuals posing a risk or having been condemned for violating the principles of this or any other of its policies.
- It is included in the Global Operational Manual for staff, the Code of Conduct for volunteers, participants, interns and visitor, and the individual contracts for consultants, contractors, advisors, trustees and partners.
- All new staff members will undertake training on the prevention of sexual exploitation, abuse, and harassment as part of their onboarding, while existing staff will undertake annual training.
- It is the responsibility of every manager to ensure that all relevant parties are aware of the policy.
- It is also their responsibility to ensure all policies and the codes of conduct are reviewed with each of their team member on an annual basis.

### **Monitoring and evaluation**

- Managers, senior representatives and those responsible for overseeing reported allegations will report on the compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made.
- Incidents and compliance with the policy will be monitored on a case by cases basis as well as on an annual basis in order to review the effectiveness of the policy and identify any required amendments.
- All new staff inductions will be conducted and confirmed by a manager or senior representative to ensure that;
  - The full scope of training has been completed, formally confirmed, and all processes followed
  - The training has included training on prevention of sexual exploitation, abuse and harassment, dealing with conflict and harassment, and expected professional behaviour.
  - There is comprehensive understanding of all FutureSense policies, including the Safeguarding policy, Whistleblowing policy, and Social Media policy.
- All FutureSense representatives are informed of the existing policies and are required to confirm their receipt and understanding of the policies in either a Code of Conduct or their contract.

**Policy Review** - annually, or in the case of a substantiated claim of abuse or misconduct.