

AL MAJMOUA'S PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE (PSEA) OF ADULTS AND CHILDREN SAFEGUARDING POLICY

Last reviewed in November 2021

1. What is Sexual Exploitation and Abuse?

Sexual Exploitation and Abuse refers to all forms of inappropriate conduct of a sexual nature, they are a violation of fundamental human rights, which can also be a criminal act.

This policy has to do with the Protection from Sexual Exploitation and Abuse (PSEA) of adults and Children Safeguarding irrespective of ability, ethnicity, faith, gender, sexuality, and culture. Vulnerable adults, women and children are particularly at risk of sexual exploitation and abuse.

2. Our values

Al Majmoua has "Zero Tolerance" for Sexual Exploitation and Abuse. Al Majmoua is committed to protecting beneficiaries we work with from sexual exploitation and abuse. In addition to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure the exploitation and abuse of adults is not taking place anywhere in our own business or in any of our partnerships.

The PSEA policy applies to all Al Majmoua staff, associates, and partners who must comply with its requirements and understand the sanctions that may be applied for breaches of the policy. This commitment will be evidenced through signing the policy and the Code of Conduct. Training in this policy is mandatory for all Al Majmoua staff, freelancers, and partners.

Al Majmoua takes all concerns and complaints seriously and will initiate a comprehensive investigation of complaints that are in violation of this policy and take disciplinary and possibly legal action as warranted.

3. How do we prevent Sexual exploitation and abuse of adults and manage children safeguarding

Al Majmoua is committed to preventing the sexual exploitation and abuse of adults and children safeguarding, through Awareness, Prevention, Reporting, and Responding.

Awareness:

Al Majmoua ensures that all staff, representatives and third parties connected to it are aware of the high standards of behavior expected of them to protect adults and children from any form of sexual abuse and exploitation in their private and working lives.

Prevention:

Al Majmoua ensures that awareness and good practice minimize the risks of any form of sexual exploitation and abuse and children safeguarding, thus conducting relevant vetting and background checks of staff as part of our recruitment process is mandatory.

Reporting:

Al Majmoua ensures that all staff and those who we work with have clear explanation on the steps to be taken where suspicions or concerns arise regarding allegations of sexual exploitation or abuse of adults and children in vulnerable populations where we work.

Responding:

Al Majmoua ensures that immediate action is taken to identify and address reports of sexual exploitation and abuse and ensure the safety and well-being of the person being sexually exploited or abused.

4. Al Majmoua Commits to:

1. Ensuring zero tolerance towards sexual exploitation and abuse.
2. Creating a safe culture for both those it serves and those who work for and represent the organization.
3. Following through on any complaints and concerns in a timely manner through its Safeguarding Committee and taking each complaint seriously.
4. Sensitizing staff, freelancers, and partners, around how to make a complaint.
5. Building a culture of dignity, honor and respect where all those who work with and are served by Al Majmoua feel empowered to report complaints.
6. Educating staff, associates, and partners that sexual exploitation and abuse constitute gross misconduct and are grounds for termination of employment and possibly legal action.
7. Providing information on how to report complaints and the investigation procedure.
8. Ensuring that all staff, associates, and partners have access to the PSEA policy and procedures as well as all other related safeguarding policies.
9. Providing training to all staff, associates, and partners on PSEA.

5. Confidentiality of Complaint

Al Majmoua will protect the confidentiality of sexual exploitation and abuse allegations to the greatest extent possible to protect the integrity of the investigation and prevent embarrassment, further discrimination or harassment, or retaliation.

Confidential or sensitive information obtained by any staff member during an investigation shall not be disclosed to others unless required by law. Concerns of individuals regarding confidentiality of information provided by them will be handled as sensitively as possible, and information shall not unnecessarily be disclosed to others.

Al Majmoua cannot guarantee, however, complete confidentiality, because the organization cannot conduct an effective investigation without revealing certain information to the alleged perpetrator and potential witnesses. Al Majmoua will share information about allegations of sexual exploitation, abuse and harassment only with those who need to know about it. Records relating to sexual exploitation, abuse and harassment complaints will also be kept confidential on the same basis.

6. Whistle-Blowing

All disclosures will be treated in confidence. Al Majmoua maintains a third-party secure reporting system through the Customer Care Unit to ensure that all staff, partners, and vendors have recourse in the event of possible misconduct. Reports may be submitted anonymously for investigation via <https://www.almajmoua.org/> or by calling the Al Majmoua hotline at 03-009004 or through WhatsApp, they can also contact the main office number found at the same webpage.

7. PSEA Commitments

All Al Majmoua staff, freelancers, and partners are expected to conduct themselves in accordance with the PSEA policy. Following are the core commitments relating to sexual exploitation and abuse that all staff, associates, and partners are expected to follow. The following behaviors are prohibited:

a- Sexual Activity with Children and Vulnerable Adults

Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of the child is not a defense. Sexual activity with vulnerable adults, as outlined in the definitions, is also prohibited.

b- Child Marriage

Any staff, associates, or partners who engage in child marriage (marriage to anyone under the age of 18) will be in violation of the PSEA policy. As per the definition of child marriage, anyone under the age of 18 is not able to give or withhold consent and is considered a form of sexual violence. Any staff married to a child under the age of 18 as per the custom or law of their country, before the Al Majmoua PSEA policy came into force will not be subject to disciplinary action. Al Majmoua, however, prohibits any such relationship from occurring once the PSEA policy came into effect.

c- Sexual Activity with Al Majmoua Beneficiaries

Sexual activity with any beneficiary is prohibited due to inherently unequal power imbalances. An Al Majmoua beneficiary is defined as anyone who receives services or support from Al Majmoua or an Al Majmoua partner.

d- Grooming and/or Coercion

Any grooming and/or coercion of a child or vulnerable adult for the purposes of obtaining sex is prohibited.

e- Sexual Exploitation

Any form of sexual exploitation is prohibited including:

- **Buying Sex.** Exchange of money, material assistance, employment, goods or services for sex, including sexual favors or other forms of humiliating, degrading or exploitive behavior is prohibited.
- **Profiting from Sexual Exploitation.** Any monetary, social or political gain from sexual exploitation is prohibited.
- **Sexual Harassment.** Any act of sexual harassment including unwelcome sexual advances or requests for sexual favors is prohibited both under the PSEA policy and the Anti-Harassment policy (Special Section in Al Majmoua's Code of Conduct).
- **Sexual Violence.** Any acts of sexual violence as outlined in the definitions in prohibited. This includes, but is not limited to, sexual violence including intercourse, sexual touching, and threats of sexual violence.
- **Physical/Emotional Abuse.** As outlined in both the Child Safeguarding and the Adult Safeguarding policies, any physical or emotional abuse is prohibited. This list may be expanded at any time and details will be communicated with staff, associates and partners through the PSEA/Safeguarding Committee).

8- Consequences

Any staff, associate, or partner who is in violation of the PSEA policy will face disciplinary procedures, which may result in disciplinary action, termination of employment or contract and/or referral to the appropriate law enforcement agency or legal authority.

9- Communication and Training

It is Al Majmoua's responsibility to ensure that all staff, freelancers, associates and partners are aware and fully compliant with the PSEA policy. To take the steps to prevent any forms of sexual exploitation or abuse, Al Majmoua will ensure that:

1. Training is provided for all staff who has a specific responsibility for implementing this Policy and associated Procedure or who may be involved in dealing with complaints, which arise.
2. Awareness raising training is provided to all staff, associates, and partners on PSEA. The training will equip staff, associates, and partners to develop awareness as well as an understanding of when and how to report any concerns.
3. Proactive steps are taken to communicate the zero-tolerance message.
4. All staff is informed of and trained in the policy and procedure.
5. All staff is aware of the definitions under this policy.
6. All staff is aware of reporting procedures.
7. All staff has signed and acknowledged that they have read and understood the policy.

10- PSEA/Safeguarding Committee

A PSEA/Safeguarding Committee has been established at the Main Office level. The PSEA/Safeguarding Committee is comprised of 5 members:

1. Executive Director
2. HR Manager
3. Internal Audit Manager
4. Operations Manager
5. Customer Care Unit Supervisor (PSEA/Safeguarding Focal point and SPM Champion)

The Committee will ensure that there is diversity and equal gender representation on the committee. It will be responsible for informing and training all staff in safeguarding, PSEA and harassment policies and procedures. They will also be responsible for receiving and investigating any safeguarding complaints, including PSEA.

The Committee will be trained in all of the Safeguarding policies as well as reporting and investigations. It will also be provided with specialized psychological first aid training so that they are able to offer appropriate support as required.

11- Staff Responsibility

All staff, freelancers, associates, and partners are required to adhere to this policy at all times and are obliged to report any suspicions of sexual exploitation and abuse of others. All staff, associates, and partners are required to sign the associated Code of Conduct and an acknowledgement of having read and understood the policy.

12- Manager Responsibility

All Managers and Directors hold overall accountability for this Policy and its Implementation. Managers also have a responsibility to support and develop systems that maintain an environment where all parties involved with Al Majmoua understand how to behave, how to raise complaints and concerns, and what action will be taken.

Any staff, associate, or partner who makes a good-faith complaint of sexual exploitation or abuse, assists, testifies, or participates in any investigation or proceeding or who reasonably opposes such conduct in the workplace will not be adversely affected in the terms and conditions of his or her employment and will not be discriminated against or discharged for engaging in such activity.

13- Support for Survivors

Referrals will be processed through the Non-Financial services department.

This document has been excerpted from SAVE THE CHILDREN'S PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE (PSEA)POLICY- August 2019, and Gender, Health Protection from Sexual Exploitation and Abuse (PSEA) Policy-January 2019