



AL MAJMOUA
المجموعة

**Al Majmoua's
Protection from
Sexual Exploitation
and Abuse (PSEA)
Policy**

November 2022

Scope

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

Al Majmoua takes all concerns and complaints seriously. We will initiate a comprehensive investigation of complaints that are in violation of this policy and take disciplinary and possibly legal actions towards it.

Policy Statement

Al Majmoua has zero tolerance for sexual exploitation and abuse. This policy focuses on protection from sexual exploitation and abuse (PSEA) of adults and children irrespective of ability, ethnicity, faith, gender, sexuality and culture. Vulnerable adults, women and children are particularly at risk of sexual exploitation and abuse.

We are committed to protecting all the communities we work with from sexual exploitation and abuse at all times, including direct or indirect beneficiaries. In addition, we act ethically and with integrity in all our business dealings and relationships; implement and enforce effective systems and controls to ensure that exploitation and abuse doesn't take place anywhere in our own institution or in any of our operations or partnerships.

Definitions

Sexual Exploitation and Abuse (SEA)¹

- Sexual Exploitation is the 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 Abuse is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Harassment²

- Sexual Harassment occurs between personnel/staff and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature.

Child Safeguarding³

- Child Safeguarding is specifically focused on preventative actions to ensure that all children are protected from deliberate or unintentional acts that lead to the risk of or actual harm.

SEA vs. SH

- In the case of SEA, the victim is a beneficiary or member of the community.
- In the case of SH, the victim is a personnel/staff member and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature.

¹ United Nations Secretary General's Bulletin: Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13).

<https://www.unhcr.org/protection/operations/405ac6614/secretary-generals-bulletin-special-measures-protection-sexual-exploitation.html>

² <https://interagencystandingcommittee.org/system/files/2022-01/2021%20IASC%20External%20Review%20Global%20Report%20PSEAH.pdf>

³ <https://www.savethechildren.org/us/what-we-do/safeguarding-children>

Core Values

All of Al Majmoua's staff, associates and partners are expected to conduct themselves in accordance with the PSEA policy. The following are core commitments related to sexual exploitation and abuse that Al Majmoua's employees and personnel are expected to follow.

Sexual Activity with Children and Vulnerable Adults

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

Sexual Activity with Al Majmoua's 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 directly from Al Majmoua or a partner.

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 and before Al Majmoua's PSEA policy came into action will not be subject to disciplinary action. However, since its effective, Al Majmoua prohibits any such relationships from occurring.

Grooming and/or Coercion

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

Sexual Exploitation

Any form of sexual exploitation is prohibited; this includes:

- **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 is 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.

Responsibilities of Employees and Related Personnel

All employees, staff members and partners are required to adhere to this policy at all times and are required to report any suspicions of sexual harassment, exploitation and abuse towards themselves and others.

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 and raise complaints/concerns, and what action will be taken.

Any employee, staff members or partner who makes a good-faith complaint of SHEA, 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/her employment and will not be discriminated against or discharged for engaging in such activity.

PSEA/Safeguarding Committee

Al Majmoua's PSEA/Safeguarding Committee consists of 5 members:

- Executive Director
- Human Resources Manager
- Internal Audit Manager
- Operations Manager
- Customer Care Unit Supervisor (PSEA/Safeguarding/Gender Focal Point and SPM Champion)

The Committee will ensure that there is diversity and equal gender representation on the committee. They will also be responsible for receiving and investigating any reports or complaints related to sexual harassment, exploitation and abuse (SHEA).

They are accountable for this Safeguarding Policy and will request from the Focal Point regular reports on policy implementation to guide if necessary. The Committee will be trained in all of the safeguarding policies, reporting mechanism and investigations.

PSEA Reporting & Investigative Procedures

Al Majmoua is committed to preventing sexual exploitation and abuse of adults and children safeguarding, through Awareness, Prevention, Reporting and Responding.⁴

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.

Communication

It is Al Majmoua's responsibility to create a safe culture for those it serves and those who work for and represent the institution by taking proactive measures to mitigate the risks of any form of PSEA, which include:

- Conducting relevant vetting and background checks of staff as part of its recruitment process
- Continuously learning on how to prevent and respond to SHEA
- Following up on complaints and concerns in a timely manner through its PSEA/Safeguarding Committee and taking each case seriously

⁴PSEA Reporting and Investigative Procedures (Annex 1)

- Building a culture of dignity, honor and respect where all employees and staff feel empowered to report complaints

Moreover, Al Majmoua should ensure that all staff, associates and partners are aware and fully compliant with the PSEA policy by:

- Highlighting Al Majmoua's core values and commitments on equality, diversity and respect towards others
- Raising awareness on PSEA and Safeguarding
- Sharing information on the PSEA policy, its procedures and complaint/concern mechanism
- Providing training to those responsible with implementing the policy or receiving complaints/concerns
- Ensuring that all employees and staff have access to the PSEA policy and procedures as well as all other related safeguarding policies
- Educating employees and staff that sexual harassment, exploitation and abuse constitute gross misconduct and are grounds for disciplinary actions, termination of employment/contract and/or possibly legal actions
- Requiring employees and staff to read, acknowledge and sign the 'Commitment to Al Majmoua's PSEA Policy'⁵

Whistle-Blowing

All disclosures will be treated in confidence. Al Majmoua maintains a secure reporting system through the Customer Care Unit to ensure that all employees, staff and partners have recourse in the event of possible misconduct. Reports may be submitted anonymously for investigation via:

- Al Majmoua's Official Website: <https://www.almajmoua.org/>
- Al Majmoua's Hotline Number: +961 3 009004 (Call or WhatsApp)

Confidentiality

Al Majmoua is dedicated to protecting the confidentiality of all sexual harassment, exploitation and abuse allegations in order to prevent embarrassment, discrimination, harassment, or retaliation and protect the integrity of the investigation.

Al Majmoua will share information about allegations only with those who need to know about it. Confidential or sensitive information obtained by any employee or staff member during the course of 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 in a sensitive manner and shall not be disclosed to others. Related records will also be kept confidential on the same basis.

Support for Survivors

Referrals will be offered through Al Majmoua's networks or through RIMS Platform, in addition to 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; EngenderHealth's Protection from Sexual Exploitation and Abuse (PSEA) Policy-January 2019; CARE's International Safeguarding Policy 15 April 2022.

⁵ Commitment to Al Majmoua's PSEA Policy (Annex 2)

Annexes

Annex 1: PSEA Reporting & Investigative Procedures

Investigative Procedures and Guidance Related to Sexual Exploitation and Abuse

Purpose

The purpose of the investigative procedures is to highlight the steps to be taken when incidents related to sexual exploitation and abuse occur. In addition, it aids and encourages Al Majmoua's staff, consultant/s and/or other personnel to report such incidents in a confidential and accountable manner.

Al Majmoua's staff is required to always maintain a respectful environment free from sexual exploitation and abuse. The procedure helps in addressing any concerns with regards to sexual exploitation and abuse, regulations and code of conduct and ethics from Al Majmoua's employees and staff with a fair approach.

Concern/Complaint Procedure

A sexual exploitation and abuse complaint should be formally documented using the official complaint form, signed and dated by the complainant. The official form can be requested from the PSEA focal person or the Senior HR Officer. Both the Senior HR Officer and the PSEA focal person should make sure that the complainant is aware and knowledgeable of the PSEA policy and the complaint she/he is reporting.

After the complainant files the concern/complaint, Al Majmoua's PSEA focal person reports the complaint to the Executive Director and takes all appropriate actions to start an investigation. If the concern/complaint is related to an employee or staff member outside Al Majmoua, Al Majmoua's PSEA focal person informs the association or organization of the complaint through their designated PSEA focal person.

Procedures and Rules

- Al Majmoua conducts its investigations internally
- If an external investigator is needed, Al Majmoua ensures its rules and regulations are maintained
- Al Majmoua's PSEA focal person monitors and records the whole investigative process
- Al Majmoua's employee or staff member accused of sexual exploitation and abuse will be on leave until the investigation is over
- Al Majmoua's accused employee or staff member is assured that there will be no action/s taken against him/her in case of false concerns
- Lack of proof is considered a false concern/complaint
- The investigative procedures and records will be archived and only accessible by Al Majmoua's PSEA focal person
- To avoid any interference from external factors, an investigation should not exceed 28 days to be completed

Outcome

- The report must be clear, straightforward and well written with sufficient evidence
- The report should separate fact from opinion
- The report should be produced during the set timeframe
- The report should include the investigator's name and date of investigation
- The report should be archived and saved with Al Majmoua's PSEA focal person
- Actions taken as a result of the report's outcome will be filed in the staff's administrative files for any future employment reference check made by other institutions, companies or organizations

Annex 2: Commitment to Al Majmoua's PSEA Policy

Declaration of Commitment to Al Majmoua's Protection from Sexual Exploitation and Abuse Policy

I, the undersigned _____, reviewed the basic principles and standards set out in Al Majmoua's PSEA Policy and agree to implement all the terms of the policy for the duration of my work within and out of the organization.

Signature:

Date: