



AL MAJMOUA
المجموعة

**Protection from
Sexual Exploitation
and Abuse (PSEA)
Policy**

February 2023

Scope

This PSEA policy applies to all of AlMajmoua's staff, and related personnel 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. Induction and/or training for this policy is mandatory for all of AlMajmoua's staff, and related personnel¹.

AlMajmoua takes all concerns and complaints seriously. We will initiate a comprehensive investigation of complaints that are in violation of this policy and take swift and appropriate action, this may include: administrative or disciplinary action, legal action, and/or referral to the relevant authorities for appropriate action. The policy applies to all employees and related personnel, both on-and off-duty (24/7).

Policy Statement

AlMajmoua 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)²

- 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 Harassment (SH)³

- It is any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. Sexual harassment may occur in the workplace or in connection with work. While typically involving a pattern of conduct, sexual harassment may take the form of a single incident. In assessing the reasonableness of expectations or perceptions, the perspective of the person who is the victim/survivor of the conduct shall be considered. *Sexual Harassment details are available in HR Code of Conduct for reference.*

Child Safeguarding (CS)⁴

- 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. *Child Safeguarding details are available in a separate policy for reference.*

¹ The term "related personnel" include, for example, sub-contractors, consultants, interns or volunteers associated with or working on behalf of the Organization.

² United Nations Secretary General's Bulletin: Special measures for protection from sexual exploitation and sexual abuse (<https://undocs.org/en/ST/SGB/2003/13>).

³ <https://interagencystandingcommittee.org/system/files/2021-07/d.%20Definitions%20SEA%20and%20SH.pdf>

⁴ <https://www.savethechildren.org/us/what-we-do/safeguarding-children>

Commitment-Responsibilities of Employees and Related Personnel

Al Majmoua will make every effort to create and maintain a safe environment, free from SEA, and shall take appropriate measures for this purpose in the communities where it operates, through a robust PSEA framework, including prevention and response measures.

This PSEA framework, affirms Organization commitment to the UN Secretary General's Bulletin on Special Measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13) and to achieving full, ongoing implementation of the IASC Six Core Principles relating to SEA.

Core Values⁵

All of Al Majmoua's staff, and related personnel 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 related personnel are expected to follow.

1. "Sexual exploitation and abuse by Al Majmoua Employees and related personnel constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. 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 regarding the age of a child is not a defence.
3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Any sexual relationship between Al Majmoua's employees and related personnel and a person benefitting from such humanitarian assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.
5. Where Al Majmoua staff and related personnel develop concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via Al Majmoua's reporting mechanisms.
6. Al Majmoua staff and related personnel are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment."

PSEA Framework⁶

Prevention

- **Vetting:**

Al Majmoua ensures conducting relevant vetting and background checks of staff as part of the recruitment process.

- **Training:**

Al Majmoua holds mandatory induction and/or trainings for all employees and related personnel on its PSEA policy and procedures.

⁵ <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>

⁶ https://www.unfpa.org/sites/default/files/admin-resource/PSEA_working_with_un.pdf

Response

• Reporting

Al Majmoua has safe, confidential and accessible mechanisms and procedures for personnel, beneficiaries and communities, including children, to report SEA allegations and ensures that beneficiaries are aware of these. Al Majmoua ensures that all staff and related personnel have clear explanation on the steps to be taken where incidents, suspicions or concerns arise regarding allegations of sexual exploitation and abuse.

Al Majmoua will share information about allegations only with those who need to know about it. **Al Majmoua will take appropriate actions to protect persons from retaliation** where allegations of sexual harassment, exploitation and abuse, or child abuse involving Al Majmoua Employees or Related are reported in good faith.

• Investigation:

Al Majmoua has a process for investigation of SEA allegations in place and shall properly and without delay conduct an investigation of SEA by its employees or related personnel, or refer to the proper investigative body if the perpetrator is affiliated with another entity.

- **Referral to National Authorities:** If, after proper investigation, there is evidence to support allegations of SEA, these cases may be referred to national authorities for criminal prosecution.

• Support for Survivors

Al Majmoua has a system to promptly refer SEA survivors to available services, based on their needs and consent. Our support and assistance will be informed by a survivor-centred⁷ approach, feasibility, and an assessment of risk to all those involved.

Cooperative arrangements

All Al Majmoua contracts and partnership agreements include a standard clause requiring contractors, suppliers, consultants and sub-partners to commit to a zero-tolerance policy on SEA and to take measures to prevent and respond to SEA.

The failure of those entities or individuals to take preventive measures against SEA, to investigate allegations thereof, or to take corrective action when SEA has occurred, shall constitute grounds for termination of any cooperative arrangement.

Al Majmoua's Commitment to Sexual Exploitation and Abuse Policy

All Al Majmoua employees must familiarize themselves with the basic principles and standards stipulated in Al Majmoua's Protection from Sexual Exploitation and Abuse Policy and agree to implement all its provisions throughout their work period inside and outside the institution by signing an acknowledgment and undertaking to abide by Al Majmoua's policies, including Protection from Sexual Exploitation and Abuse Policy.

As for the trainees who are non-Al Majmoua staff members, they are required to sign a document that has been updated to include Al Majmoua's policies, including the Protection from Sexual Exploitation and Abuse Policy. Al Majmoua partnership contract with suppliers and contractors has also been updated to include a clause to adhere to this policy:

“In the performance of the Contract, the Contractor and their employees or any other persons who may be engaged by the contractor shall comply with Al Majmoua's PSEA policy, and commit to the full and complete implementation of its core principles (See Annex: Al Majmoua's PSEA Policy). The Contractor shall take all appropriate measures to prevent and respond to sexual exploitation and abuse. Failure to take appropriate preventive and response measures constitutes grounds for termination of the agreement with Al Majmoua.”

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.

⁷ «Survivor-centered»: survivors' needs and wishes guide our response. Survivors are treated with dignity and respect, and their basic rights and privacy are a priority.