



CHANGE FOR CHILDREN ASSOCIATION (CFCA)

Protection from Sexual Exploitation and Abuse (PSEA) Policy & Code of Conduct

Rationale/Purpose:

CFCA is committed to a human rights-based approach to development, driven by human dignity and social justice. At the core of our mission is the belief that respect for human rights will help lift people out of poverty and injustice by allowing them to assert their dignity, have a voice, and speak out for their rights. These individuals can only become empowered agents of change if they are protected from exploitation, abuse, and harm of any kind, be it physical, sexual, or emotional.

In our efforts to impact poverty and social justice, CFCA engages with marginalized communities in the Global South. Sexual misconduct, including exploitation and abuse, occur in all countries and societies, but the children and adults we serve are particularly vulnerable. CFCA recognizes sexual exploitation and abuse as violations of universally accepted international legal norms and standards. This policy declares CFCA's commitment to protecting those we serve from sexual exploitation and abuse, involving CFCA employees, volunteers, and related personnel. As we recognize the heightened vulnerability of children, this policy also confirms our pledge to protect the welfare of children from sexual exploitation and all forms of abuse, involving CFCA employees, volunteers, and related personnel.

Definitions:

Sexual Exploitation: 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 Abuse: 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.

Child Abuse: According to the World Health Organization, "child abuse" or "maltreatment" constitutes "all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment, or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power".

- **Physical Abuse:** Hitting, shaking, throwing, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or caregiver feigns the symptoms of, or deliberately causes ill health to a child who they are looking after.
- **Emotional Abuse:** The persistent emotional ill-treatment of a child such as to cause severe and persistent effects on the child's emotional development. This includes, but is not limited to, conveying to children that they are inadequate or valued only so far as they meet the needs of another person, age or developmentally inappropriate expectations being imposed on

children, causing children to frequently feel frightened or in danger, and the exploitation or corruption of children.

- **Sexual Abuse:** Involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. Sexual abuse may involve physical contact, including penetrative or non-penetrative acts. It may also include non-contact activities, such as involving children in viewing or producing, pornographic materials, involving children in watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Principles:

- **Human Rights-Based Approach to Development**
 - Within a human rights-based approach to development, Protection from Sexual Exploitation and Abuse Policy and Code of Conduct supports and promotes protection from sexual exploitation and abuse as an explicit internationally recognized human right, articulated in international human rights law and agreements.
- **Safe and Supportive Environments**
 - CFCA is committed to maintaining a safe and supportive environment all CFCA personnel and partner organization personnel. This includes measures to prevent, report, and respond to allegations of child abuse, sexual exploitation, and abuse. All employees and related personnel will be provided with the proper information and training and will be obligated to adhere to the prevention and reporting processes used to enforce this policy.
- **Social Justice and Human Dignity**
 - CFCA is committed to seeking the transformation of unequal power relationships that make individuals and children vulnerable to sexual exploitation and abuse. Sexual relationships between CFCA or partner organization personnel are strongly discouraged, as they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of CFCA's development work.
 - Any acts of child abuse, sexual exploitation, or abuse by Board Members, staff, volunteers, and related personnel of CFCA and our partner organizations constitutes acts of gross misconduct and are therefore grounds for termination and/or criminal prosecution.
- **Non-Negotiable Duty**
 - CFCA Board Members, staff, volunteers, and partner organizations have a duty to protect vulnerable adults and children from sexual exploitation and abuse. All CFCA personnel will be held responsible for implementing the mechanisms of protection, as appropriate for their role. This duty is imperative and non-negotiable.

Objectives and Strategies

1. Prevention

- As a condition for working with CFCA, all staff, volunteers, and related personnel are required to sign a written commitment to adhere to our Protection from Sexual Exploitation and Abuse Policy and Code of Conduct.

- CFCA staff, volunteers, and related personnel are obligated to create and maintain an environment that prevents child abuse, sexual exploitation, and abuse. Supervisors at all levels have the responsibility to support and develop systems which maintain this environment.
- Procedures are in place to ensure all staff, volunteers, and related personnel share an understanding and commitment to our Protection from Sexual Exploitation and Abuse Policy and Code of Conduct. These methods include measures regarding recruitment procedures, incorporating CFCA's standards in relevant codes of conduct, review of management structures, staff and volunteer training, and clear guidelines on how the policy should be enforced.
- All partner organizations will be informed of CFCA's Protection from Sexual Exploitation and Abuse Policy and Code of Conduct and will be expected to enforce the policy to the fullest extent. Partnership Agreements for project implementation will include the following:
 - Partner organizations must develop their own PSEA Policies and Codes of Conduct.
 - Partner organizations must provide training for staff in the elements of this policy and code of conduct.
 - Partner organizations must implement a series of activities that educate beneficiaries about their rights to live free from Sexual Exploitation and Abuse.
 - Partner organizations will provide beneficiaries with feedback mechanisms that allow for confidential reporting directly to CFCA of any infractions or incidences that demonstrate a lack of enforcement of this policy.
 - Failure to provide training, feedback and evidence of enforcement mechanisms and signed MOUs from staff members shall constitute as grounds for CFCA to terminate partnership agreements.
- The role of specific staff positions has been developed to support and ensure effective implementation of strategies to prevent and respond to instances of sexual exploitation and abuse. These strategies are disseminated to all partner organizations.

2. Implementation and Enforcement

- CFCA will respond to all reports of actual or alleged violations of the Protection from Sexual Exploitation and Abuse Policy and Code of Conduct, regardless of who the allegations are about, who the referrer is, or where the referrer is from.
- An anonymous reporting process is in place to ensure complaints be kept confidential to the extent practicable and to encourage reporting of any suspected misconduct.
- Reporting procedures will be thoroughly explained to all CFCA personnel and personnel from partner organizations to ensure they are clear on what steps to take should they suspect or witness policy violations. This includes a documented reporting procedure in the local language for partner organizations.
- Reports of misconduct can be made in written or oral form. If reports are made orally, the receiving CFCA staff or partner organization staff will create a written report of the misconduct. Reports of misconduct will include as much information as possible, including the date of the report, person reporting, and location, date, and persons involved.

- Written reports will be forwarded as quickly as possible to the immediate supervisor and to the CFCA Executive Director.
- CFCA program managers or partner organization managers, with the knowledge and approval of the CFCA Executive Director, will act on all concerns or allegations by initiating a prompt and thorough, fair and confidential investigation, including interviewing practices with the accuser and witnesses. Special procedures and checklists will be used to ensure the policy is being enforced to the fullest extent. This process may also include engagement with investigative expertise, as fitting.
- Where complaints are upheld, appropriate disciplinary action will follow. In cases of acts of a criminal nature committed by a CFCA member or partner organization personnel, referral will be made to relevant authorities for appropriate action, including criminal prosecution.
- Appropriate action will be taken to protect reporting persons and victims from retaliation when allegations of child abuse, sexual exploitation, or abuse are made. CFCA will also provide support and assistance to victims, including medical treatment, legal assistance, and psychological support as appropriate.
- Additional training on prevention of sexual exploitation and abuse, and prevention of child abuse of all kinds will be conducted as necessary.

3. Monitoring and Evaluation

- Through continued monitoring and evaluation of the Protection from Sexual Exploitation and Abuse Policy and Code of Conduct, CFCA aims to learn from practical case experiences. This information will be used to make policy reviews and changes. Monitoring and evaluation will be done by checking whether the standards from the Protection from Sexual Exploitation and Abuse Policy and Code of Conduct are being implemented and whether safeguards are working.

4. Accountability

- The CFCA Annual Plan, approved by the Board of Directors each year, will include specific plans on how this policy will be implemented and evaluated in the current year. The CFCA Executive Director is responsible to lead the implementation of this policy, and to report progress annually to the Board.
- Within their program areas, CFCA staff will be responsible for monitoring and compliance with the code of conduct, and reporting any misconduct to the CFCA Executive Director for follow-up.
- International partner organizations will be responsible for compliance with this policy and code of conduct as well as their own PSEA policy and code of conduct among their staff and associates. They will report to the CFCA International Projects Manager and Executive Director concerning any misconduct and actions taken in response.
- International partner organizations will be responsible to establish feedback mechanisms that provide beneficiaries with direct access to CFCA and demonstrate their use in the enforcement of this policy.

5. Public Image and Communications

- In an effort to maintain transparency with our supporters and the public, CFCA Board Members and staff will carefully assess what is appropriate in terms of public disclosure in cases of child abuse, sexual exploitation, and abuse within the organization and its activities with partner organizations.

CODE OF CONDUCT

All Change for Children staff and overseas volunteers understand the policy above and will adhere to above guidelines for ethical behaviour. All staff and volunteers are required to sign a memo of understanding (MOU) of this Policy and Code of Conduct on the occasion of joining the organization and again every three years.

All partner organization staff have received training on this and their own organization's PSEA and have signed an MOU demonstrating that they understand CFCA's and their own organization's policy and code of conduct.

*Approved by CFCA Board, February 2019. Revised June 2019. Revised December 2019.
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