



CHANGE FOR CHILDREN ASSOCIATION (CFC)

Protection from Sexual Exploitation and Abuse (PSEA) Policy

Rationale/Purpose:

CFC 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, CFC 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. CFC recognizes sexual exploitation and abuse as violations of universally accepted international legal norms and standards. This policy declares CFC's commitment to protecting those we serve from sexual exploitation and abuse, involving CFC 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 CFC 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**
 - CFC is committed to maintaining a safe and supportive environment all CFC 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**
 - CFC is committed to seeking the transformation of unequal power relationships that make individuals and children vulnerable to sexual exploitation and abuse. Sexual relationships between CFC or partner organization personnel are strongly discouraged, as they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of CFC's development work.
 - Any acts of child abuse, sexual exploitation, or abuse by Board Members, staff, volunteers, and related personnel of CFC and our partner organizations constitutes acts of gross misconduct and are therefore grounds for termination and/or criminal prosecution.
- **Non-Negotiable Duty**
 - CFC Board Members, staff, volunteers, and partner organizations have a duty to protect vulnerable adults and children from sexual exploitation and abuse. All CFC 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

All partner organization staff will receive training on this and their own organization's PSEA and will sign an MOU (Annex A) demonstrating that they understand CFC's and their own organization's policy and code of conduct and will abide by these

- As a condition for working with CFC, all staff, volunteers, and related personnel are required to sign a Memorandum of Understanding (MOU) indicating that they have read and understand: 1) the CFC Protection from Sexual Exploitation and Abuse Policy, and 2) CFC Code of Ethics, and that they will adhere to the guidelines for ethical behaviour in these policies (Annex A – Staff and Volunteer MOU). CFC staff will sign this MOU on the occasion of joining the organization and again every three years.
- CFC staff, volunteers, and related personnel are obligated to create and maintain an environment that prevents child abuse, sexual exploitation, and other types of abuse within the organization. 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 the CFC PSEA Policy Protection from Sexual Exploitation and Abuse Policy and Code of Conduct. These methods include measures

regarding recruitment procedures, incorporating CFC'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 CFC's Protection from Sexual Exploitation and Abuse Policy and Code of Conduct and will be expected to uphold and enforce the policy as appropriate within the local context and national legal frameworks 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 will publicize their PSEA Policy and staff Code of Conduct to stakeholders and beneficiaries on their websites, in print information, posters at events, and through announcements at project activities.
 - Partner organizations will implement activities that educate beneficiaries about their rights to live free from sexual exploitation and abuse. Education on other potential risks, such as human trafficking or kidnapping, will also be provided.
 - Partner organizations will provide beneficiaries with feedback mechanisms that allow for confidential reporting directly to CFC 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 grounds for CFC to terminate partnership agreements.

Specific staff members within the partner organization will be responsible to ensure effective implementation of the PSEA policy and the staff Code of Conduct within their organization and activities with beneficiaries.

2. Implementation and Enforcement

- CFC 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.
- A reporting process is in place to ensure complaints be kept confidential to the extent practicable and to encourage reporting of any suspected misconduct. All disclosures will be treated with utmost discretion, and CFC will endeavor to keep reports confidential, however, this may not be possible if identification or reporting is required by law or in order to enable the organization or law enforcement to conduct an adequate investigation.

- The reporting process will be clarified in each project, program or organization, including first point of contact, and a second point of contact if the first is not appropriate or in a conflict of interest. If satisfaction is not achieved through communication with the project, program or organizational first or second point of contact, the complainants can directly communicate with the Executive Director of CFC. Contact information, such as names, emails and phone numbers, will be made available to all those involved in CFC projects, programs or partner organizations.
- CFC will protect “Whistleblowers,” that is staff, volunteers, or related personnel who report suspected misconduct, from victimization, reprisal, or negative impacts to their position or employment.
- Reporting procedures will be thoroughly explained to all CFC 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 CFC 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 CFC Executive Director.
- CFC program managers or partner organization managers, with the knowledge and approval of the CFC 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 CFC 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. CFC 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 for all staff and volunteers involved in CFC projects, programs, or partner organizations on a yearly basis.

3. Monitoring and Evaluation

Through continued monitoring and evaluation of the Protection from Sexual Exploitation and Abuse Policy and Code of Conduct, CFC 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 CFC 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 CFC Executive Director is responsible to lead the implementation of this policy, and to report progress annually to the Board.
- Within their program areas, CFC staff will be responsible for monitoring and compliance with the code of conduct, and reporting any misconduct to the CFC 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 CFC 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 CFC 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, CFC 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.

Approved by the CFC Board of Directors: March 2023

Date for Review: March 2028

Annex A

Memorandum of Understanding Code of Conduct for CFC Employees, Partner Organization Staff, Volunteers

The CFC Code of Conduct has zero tolerance for any acts of sexual exploitation and abuse, harassment, abuse of power, fraud, and corruption carried out by any person(s) involved with the delivery of CFC funded programming, including CFC staff, partner staff, consultants, and community-based workers. The Employee/Consultant/Volunteer agrees to sign and abide by this Code of Conduct throughout the duration of their employment with CFC.

I understand that I can significantly contribute to risk mitigation and prevention of sexual violence by translating this Code of Conduct into actions in my work.

I understand that I must uphold our collective commitments to colleagues, partners and the communities we serve by adhering to the standards of behaviour outlined in:

- 1) CFC Code of Ethics and Operational Standards; and
- 2) CFC Policy for Prevention of Sexual Exploitation and Abuse (PSEA).

I, undersigned, _____, hereby declare that I have read, understood, and will comply with the conduct and regulations outlined in the CFC Code of Ethics and Operational Standards, and the CFC PSEA policy.

I understand that breach of any provision of these two policies may result in disciplinary action, up to and including termination of the contract.

SIGNATURE:

DATE:

WITNESS NAME:

WITNESS SIGNATURE: