



Preventing Sexual Exploitation, Abuse and Harassment (PSEAH)

Policy



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Name and signature of Board Chair

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Policy Statement

Community Centre for Integrated Development (CCID) has a zero-tolerance policy for all forms of sexual wrong doing including Sexual Exploitation, Sexual Abuse, and Sexual Harassment (SEAH) in all its activities. At CCID, we believe all people have a right to live their lives free from sexual violence and any abuse of power regardless of age, gender, sexuality, sexual orientation, disability, religion or ethnic origin. Sexual Exploitation, Sexual Abuse and sexual harassment violate human dignity and universally recognized international legal norms and standards and constitute unacceptable behaviour. We recognize that Sexual Harassment results from a culture of discrimination and privilege, based on unequal relations and power dynamics. It creates hostile work and work-related environments, which limit the ability of affected persons to thrive and CCID to achieve its mission. SEAH has no place at CCID and CCID recognises the imperative to prevent and respond effectively to SEAH and to protect persons, especially vulnerable individuals, and victims of SEAH in related activities. These protections are essential to building resilient communities throughout CCID's work.

We recognize that there are unequal power dynamics across the organization and in relation to those we serve, and that we face risk of some people exploiting their position of power for personal gain. CCID will not tolerate its employees/staff, volunteers, consultants, partners, or any other representative associated with the delivery of its work carrying out any form of sexual exploitation, sexual abuse or sexual harassment. CCID commits to supporting survivors, improving safeguarding capacity, reporting, investigating, responding to, and preventing sexual harassment and sexual exploitation and abuse. CCID will use this Policy in conjunction with relevant laws to respond to any complaints and concerns raised.



Policy Objectives

This Policy aims at setting out CCID's approach to preventing and addressing sexual exploitation, abuse, and harassment (PSEAH). This includes: CCID's commitments to prevent SEAH and to ensure effective action is taken when problems occur; Principles and commitments upon which we (CCID) will base our decision making and actions; and our expectations of all those who work in/for CCID or on behalf of CCID.

Scope of the Policy

This policy applies to the Board of Directors at CCID, all employees/staff of CCID, service providers for the organisation, volunteers, community mobilisers, community health workers, community Based Counsellors, partners, interns and those involved with other contractual/moral relationship with the organisation. They shall commit to abstaining from any act or actions which might constitute sexual exploitation, abuse and harassment. This policy thus affirms the responsibility of CCIDs Board of Directors, personnel and associates to prevent sexual exploitation, abuse and harassment in all forms.

Defining the Concepts: Sexual Exploitation, Abuse and Harassment

Sexual exploitation and abuse (SEA) are defined in the United Nations Secretary-General's Bulletin on Special measures for protection from sexual exploitation and sexual abuse (2003)¹ as follows:

Sexual Exploitation is *“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”*.

¹ United Nations (2003). Secretary General's Bulletin: Special Measures for Protection from Sexual Exploitation and Sexual Abuse, UN Doc. ST/SGB/2003/13. Available at: <https://undocs.org/ST/SGB/2003/13>



Examples of behaviours that constitutes sexual exploitation include transactional sex (the exchange of money, employment, goods or services for sex, including sexual favours), solicitation of transactional sex, exploitative relationship and human trafficking².

Sexual Abuse is “*the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions*”. Examples of sexual abuse include rape, sexual assault, sex or sexual activity with anyone under the age of 18³.

Sexual Harassment. The United Nations’ System Model Policy on Sexual Harassment⁴ , adopted in 2018 provides the following uniform definition of sexual harassment:

“Sexual harassment 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 target of the conduct shall be considered”.

Sexual harassment can take a variety of forms – from looks and words though to physical contact of a sexual nature. Examples of sexual harassment (non-exhaustive list) include:⁵

- Attempted or actual sexual assault, including rape
- Sharing or displaying sexually inappropriate images or videos in any format
- Sending sexually suggestive communications in any format
- Sharing sexual or lewd anecdotes or jokes
- Making inappropriate sexual gestures, such as pelvic thrusts
- Unwelcome touching, including pinching, patting, rubbing, or purposefully brushing up against another person
- Staring in a sexually suggestive manner
- Repeatedly asking a person for dates or asking for sex

² UN Glossary on Sexual Exploitation and Abuse: Thematic Glossary of Current Terminology related to Sexual Exploitation and Abuse (SEA) in the Context of the United Bridging the Gap: Sexual Exploitation, Abuse and Harassment (SEAH) 20 Nations, 24 July 2017, available online at: https://hr.un.org/sites/hr.un.org/files/SEA%20Glossary%20%20%5BSecond%20Edition%20-%20202017%5D%20-%20English_0.pdf

³ Ibid.

⁴ United Nations, Chief Executives Board for Coordination Task Force (2018). United Nations System Model Policy on Sexual Harassment. Available at: https://unsceb.org/sites/default/files/imported_files/UN%20System%20Model%20Policy%20on%20Sexual%20Harassment_FINAL_0.pdf

⁵ Ibid.



- Rating a person's sexuality
- Making sexual comments about appearance, clothing, or body parts
- Name-calling or using slurs with a gender/sexual connotation,
- Making derogatory or demeaning comments about someone's sexual orientation or gender identity

Our Core Principles on PSEAH

CCID is committed to eradicating all forms of PSEAH. All CCID personnel and associates must uphold and promote the highest standards of ethical and professional conduct, and abide by this policy. CCID recognises that all persons have the right to be protected from sexual exploitation, abuse and harassment. We are therefore committed to the following **6 principles** on PSEAH:

- 1) Principle of zero tolerance.** CCID will not tolerate any form of Sexual Exploitation, Sexual Abuse, or Sexual Harassment (SEAH). Sexual exploitation and abuse by CCID's Board of Directors, employees, related personnel, volunteers, community mobilisers, community health workers, community Based Counsellors, partners and interns constitute acts of gross misconduct and are, therefore, grounds for termination of employment or contract/agreement. Sexual harassment by CCID's Board of Directors, employees, related personnel, volunteers, community mobilisers, community health workers, community Based Counsellors, partners and interns is grounds for disciplinary action up to and including dismissal.
- 2) CCID will take all available measures to prevent, mitigate, investigate and remedy SEAH** in CCID-related activities. CCID will actively promote equality in order to provide a collegiate, lawful and harmonious working environment.
- 3) Sexual activity with children** (persons under the age of 18) **is prohibited** regardless of the age of the majority or age of consent locally. Mistaken belief in the age of the child is not an excuse.
- 4) CCID will endeavour to raise awareness** of SEAH among CCID's staff and its implementing partners, consultants or any other type of partners or service providers involved in CCID-related activities.



- 5) CCID will take steps to encourage its Partners involved in CCID-related activities, to **abide by this Policy or adopt policies and procedures that are consistent with this Policy**, with the purpose of safeguarding against SEAH in CCID-related activities. CCID will reserve its right to terminate a contractual relationship with a partner in case of breach of those policies and procedures. CCID will apply sanctions, disciplinary, or other remedial measures if this Policy is violated.
- 6) Where any **CCID employee or related Personnel** develops concerns or suspicions regarding sexual abuse or exploitation or sexual harassment by a fellow worker, whether in CCID or not, they **must immediately report such concerns** via the established reporting mechanisms.

CCID's Commitment on PSEAH

CCID is committed to preventing any form of sexual exploitation, abuse and harassment and responding robustly when these harms take place.

We understand that SEAH incidents are rooted in an imbalance of power. CCID views any form of sexual violence as a gross violation of human rights and we insist and maintains a zero tolerance policy with staff or other individuals working with/for CCID (hereafter “representatives”)⁶ and related to CCID’s activities and is committed to react to any form of sexual harassment, exploitation or abuse towards anyone CCID comes into contact with through its work. CCID is committed to:

- 1) Creating a safe working environment that upholds the rights and dignity of all.
- 2) Ensuring that our SEAH work, continuously improves based on best practises.
- 3) Ensuring that our approach is survivor-centred⁷
- 4) CCID is committed to working with complainants and survivors to ensure they are central to any response, are not further harmed or disempowered by any processes, and receive support throughout.
- 5) Demonstrating our zero-tolerance approach to SEAH concerns by:
 - i. listening, fully investigating complaints, and reflecting and learning from them.

⁶ Other individuals working with/for CCID include (but are not limited to) partners’ staff, CCID’s volunteers (including board), consultants, contractors and interns.

⁷ A survivor-centred approach means placing the needs and priorities of survivors of violence at the forefront of any response.



- ii. ensuring that all allegations of SEAH are responded to in a timely, robust, and survivor centred manner.
 - iii. ensuring that we embed SEAH into every aspect of our work – from recruitment to programme design and implementation.
- 6) CCID will respond in a professional and timely manner to all concerns or allegations of sexual exploitation, abuse or harassment.
 - 7) CCID will make every effort to create and maintain a safe, equitable, and inclusive organizational culture where all those who work for and with CCID as well as those in the communities where CCID operates are treated with dignity and their rights and voices are heard and respected.
 - 8) Confidentiality: Survivors have the right to choose to whom they will or will not tell their story, and information should only be shared with the informed consent of the survivor. Although there may be instances where an imminent threat of harm to a child or someone else may override confidentiality.

Guiding Legal Framework on the Issue

This policy confers and upholds the obligations of the following legal framework:

a. International/Regional Legal Instruments

- United Nations Convention on the Rights of the Child (UNCRC) (1989)
- Convention on the Elimination of all forms of Discrimination Against Women (CEDAW)
- Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (1987)
- The Beijing platform for Action, para. 178.
- The ILO Discrimination (Employment and occupation) Convention (No. 111) 1958
- The African Charter on Human and People’s rights. 1981.
- The African Charter on the Rights and Welfare of the Child (1990)
- The protocol to the African Charter on Human and People’s rights on the Rights on the Rights of Women in Africa (Maputo Protocol) 2003.

b. Domestic Legal Instruments

- Constitution of the Republic of Cameroon, of 2008



- The Cameroon Penal Code (provisions relating to Sexual Offences and other Related Abuses on persons) of 2016.
- Law No. 2005-15 of 29 December 2005 relating to the fight against child trafficking and Slavery.

Designated Authority for PSEAH at CCID

SEAH complaints at CCID shall be led by the Program Manager for Gender and Human Rights Department. The main functions shall include:

- Ensuring that PSEAH considerations are included in recruitment and orientation processes;
- Ensuring that training on PSEAH Policy is provided for all new and existing CCID employees, interns and volunteers. For new personnel, training will be done during the induction process and for everyone, every six months. Independent contractors will be advised of this policy and obligated to adhere to its provisions;
- To receive reports of alleged/suspected or actual SEAH and act accordingly.
- To be familiar with legislation pertaining to SEAH;
- To ensure that support systems are put in place for victims/survivors in cases of allegations;
- To ensure that systems are in place for recording and retaining all relevant documentation in relation to SEAH issues; and
- To review the policy and amend as the need arises.

PSEAH Guidelines Within CCID

Screening and recruitment

CCID is committed to the following recruitment practices that aim to prevent SEAH with persons engaged in CCID's programme work.

For staff, Interns and volunteers who have contact with persons in their work, CCID shall:



- During the recruitment process ensure two referee reports are received for such staff, interns and volunteers; and as well ask at least two questions relating to PSEAH. References from family members will not be accepted. References will be checked on any SEAH issue or incident involving the candidate.
- All staffs, volunteers, community mobilizers, interns and consultants will be required to acknowledge in writing the receipt, understanding and commitment to CCID's PSEAH Policy and related standards of behaviour prior to commencement of their contract/placement. (**see Annex 1: Declaration of Agreement to be Bound by and Uphold the CCID's PSEAH Policy**). The signed statement of commitment will be kept on file together with the signed employment or collaboration contract.
- CCID will not to hire or employ an applicant if the recruitment process or background check reveals that the applicant is an abuser or perpetrator of SEAH.
- CCID will not hire or employ anyone with a prior conviction for SEAH.

Training and awareness

For effective implementation of the PSEAH Policy, CCID's commitment to prevent SEAH needs to be understood clearly and accurately by all CCID's personnel and associates, as well as target individuals and communities. Therefore, CCID is committed to the following:

- Include in the induction process for all new staffs, volunteers, community committee members, interns and consultants a module on what SEAH is and the content of the PSEAH Policy in order to ensure that they are all aware of the Policy- the related standards of behaviour and the implications of breaching these standards.
- Conduct repeated (twice a year) refresher training for personnel on the content of the PSEAH Policy and related standards of behaviour.
- Raise awareness widely amongst target communities on what SEAH is, CCID's zero tolerance towards SEAH and options for reporting SEAH concerns.
- Orient individuals involved in CCID's programmes on their rights to protection from all forms of harm, CCID's zero tolerance towards SEAH and options for reporting SEAH concerns in a manner which is age, gender and diversity sensitive.



- Disseminate the contents of CCID's PSEAH Policy, summarily in local languages disseminated in target communities and other relevant stakeholders.
- Monitor and regularly review the effectiveness of the PSEAH training and awareness materials and programmes.

Safe Cooperative Arrangements with Contractors

CCID will not enter into contractual agreements for the supply of goods, services or works with contractors which are known abusers or perpetrators of SEAH.

- As part of the pre-qualification and bidding processes, all potential contractors will be required to submit together with the official documentation the Supplier/Tenderer's Declaration to the effect they are aware and formally agree to abide by CCID PSEAH Policy.
- Where possible, an independent background check into the contractor's business practices will be conducted to inform the pre-qualification assessment or bid analysis.
- The Supplier's/Tenderer's Declaration and the information from a possible independent background check will be used by the Evaluation Committee in the selection process. Copies of all official documentation will be kept on file.

The above-mentioned ethics clauses will be integral part of any supply, service or works contract.

CCID will suspend or cancel a contractual agreement for the supply of goods, services or works, if SEAH practices are discovered at any stage of the award process or during the fulfilment of the contract itself on the basis of investigation into SEAH allegations. However, CCID will ensure that termination of a contractual agreement is carefully considered as a last resort and dependent on the contractor's mishandling of the SEAH concern rather than on the basis of the SEAH concern having arisen, reported and handled according to the CCID's PSEAH Policy.



Safe Cooperative Arrangements with Partners

Acceptance of and compliance with CCID's PSEAH Policy and related standards of behaviour must be a condition of every partnership agreement or sub-agreement. CCID will not enter into partnership arrangements with entities which utilise SEAH and do not commit to protecting children from harm.

CCID must ensure the following mandatory practices when working with partners:

- An assessment about the partner's commitment and capacity to PSEAH will be conducted prior to signing a partnership agreement or sub-agreement, as well as at regular intervals during the implementation. The assessment must take into consideration also the partner's contact with children.
- Partners which do not have their own robust PSEAH Policy will be required to sign up to that of CCID as a condition of any partnership arrangement (**see Annex 2: Declaration of Agreement to be Bound by and Uphold CCID's PSEAH Policy for Partners**). The statement of commitment to the CCID's PSEAH Policy shall be signed preferably by the legal representative of the partner and will be kept on file by both parties. The personnel of the partner will need to be made aware of the content of the CCID's PSEAH Policy and related standards of behaviour.

CCID will suspend or cancel a partnership agreement or sub-agreement on the basis of investigation into allegations of SEAH. However, CCID will ensure that termination of a partnership agreement or sub-agreement is carefully considered as a last resort and dependent on the partner's mishandling of the SEAH concern rather than on the basis of the SEAH concern having arisen, reported and handled according to the CCID's PSEAH Policy.

Procedure for Managing Allegations

All cases of SEAH at CCID shall be referred to the Program Manager for the Gender and Human Rights Department, The direct supervisors of the accused will be in charge for complaints (if the Program Manager for the Gender and Human Rights is concerned, any of the Executive Director will be contacted and if any of the Executive Director's are implicated,



CCID's Board Chair shall take charge and if any of the Board members is implicated, the accused shall be reported to the Cameroonian Police service to be seized of the matter. CCID's employees and associates shall be subjected to the Gender and Human Rights Department for all allegations on SEAH.

If the Gender and Human Rights Department Program Manager is implicated, the allegations shall be reported to either of the Co- Executive Directors to be seized of the matter. The Gender and Human Rights Department (or either of Co- Executive Directors (when the Gender and Human Rights Department is implicated)) in charge of the matters of SEAH shall adopt the following procedure for managing allegations of SEAH:

- Make an initial assessment on the action to be taken, which may involve an internal inquiry or a more formal investigation. The personnel who reported the matter may request to be informed of how the matter is progressing, and in such cases, CCID through the authority in charge of the matter shall keep the personnel informed of what action shall be taken;
- Require the continued cooperation of the personnel who reported the allegation SEAH in carrying out the investigation.
- Following the investigation, if the circumstances of the matters reveal a possibility of SEAH which is not of a serious nature, the matter shall be discussed at CCID with the perpetrator called to order.
- If the matter is so serious and/or if the above channel has been exhausted and the personnel who reported the allegation is of the opinion that the concerns have not been adequately addressed, or the matter is so serious that it cannot be discussed at CCID, it will be reported in good faith to the Cameroonian Police service by the CCID authority seized of the matter.
- The personnel reporting the allegation reserve the right to seek independent legal advice at any stage of the process, either from a legal adviser, attorney, labour law organisation, or any independent legal advice centre.



Recording and Managing Confidential Information

Every effort shall be made to ensure that SEAH matters are treated with sensitivity and confidentiality. As such, the following guidelines shall be observed:

Information shall always be handled and disseminated on a “need-to-know” basis only. Only the people listed below are to be involved in the investigation processes:

- The Gender and Human Rights Program manager (or when implicated, either of the Co-Executive Directors) and direct manager of the alleged abuser if need be;
- In cases involving children, the parents/caregivers of the child in respect of whom suspicions of SEAH has been raised;
- The person reporting the matter of suspected SEAH;
- The suspected abuser and parents/caregivers if the suspected abuser is a minor;
- Information should be stored in a secure place with limited access to which only designated persons have access; and
- Faxing of information is discouraged unless absolutely necessary.

The Gender and Human Rights Department (or when implicated, either of the Co-Executive Directors) shall be the only people who have access to the following records:

- All complaints about the safety and welfare of victim/survivor while working with CCID;
- All disclosures, concerns or allegations of person abuse; and
- Follow-up to any complaints, disclosures, concerns or allegations, including informal advice from government departments and other agencies working against SEAH, reports to statutory agencies and documents informing parents/caregivers of SEAH abuse.

Conclusion

CCID shall ensure that this PSEAH Policy is up to date with current PSEAH practices and shall ensure that all CCID personnel and associates are aware of the most current version of the PSEAH Policy.



APPENDIXES

Annex 1: Declaration of Agreement to be Bound by and Uphold CCID PSEAH Policy

I, the undersigned _____,
hereby acknowledge that I have received, read and understood CCID's PSEAH Policy and
pledge to abide by the expectations and provisions therein.

I am fully aware that should I fail to comply with this policy and related standards of
behaviour, I will be liable to suspension, summary dismissal and/or face legal implications
commensurate to the offence/crime I will have committed.

I testify that I have no prior criminal record in any country related to child abuse or sexual
exploitation, abuse and harassment, and I have never been involved in any form of child
abuse or sexual exploitation, abuse and harassment before.

I commit to respect and promote the implementation of this policy at all times while under
collaboration with CCID by the way I conduct myself and by reporting any violation of the
related standards of behaviour that come to my knowledge.

To show my acceptance and commitment to comply with CCID's PSEAH Policy, I hereby sign
this declaration form.

Signature: _____

Name: _____

Position: _____

Place: _____

Date: _____

Relationship with CCID: _____

Relationship categories include (tick the suitable option):

- Board of directors
- Current employees/Staff



- Prospective employees/Staff
- Volunteer / Intern
- Community Committee Member
- Consultant
- Other

(specify):.....

...



Annex 2: Declaration of Agreement to be Bound by and Uphold the CCID’s PSEAH Policy for Partners

_____ (NAME OF THE ENTITY)
hereby acknowledges that it has received and read a copy of the CCID’s PSEAH Policy.

_____ (NAME OF THE ENTITY)
agrees that all persons have equal rights to protection from abuse, exploitation, harassment and violence, and that everyone has a responsibility to support the protection of all persons.

_____ (NAME OF THE ENTITY)
accepts and commits to actively prevent acts of SEAH by its personnel and associates, and to respond to SEAH incidents that are perpetrated against individuals in compliance with the CCID’s PSEAH Policy.

_____ (NAME OF THE ENTITY)
ensures that no personnel hired, deployed or engaged in projects implemented in partnership with CCID or with the support of CCID, have ever been involved in any form of abuse, neglect, exploitation and violence against children before.

_____ (NAME OF THE ENTITY)
ensures that all personnel hired, deployed or engaged in projects implemented in partnership with CCID or with the support of CCID, will participate in trainings on the content of the CCID’s Global PSEAH Policy and related standards of conduct organised by CCID.

_____ (NAME OF THE ENTITY) is
fully aware to be liable to suspension or cancellation of the partnership agreement or sub-agreement with CCID should any of its personnel member or associate be found in breach of CCID’s PSEAH Policy.

Signature:

Signature:



Name:

Position:

Place:

Date:

On behalf of:

Name:

Position:

Place:

Date:

On behalf of CCID:
