



Prevention of Sexual Exploitation and Abuse (PSEA) Policy

Policy Number: 405

Effective Date: July 2020

Next Review Date: July 2022

Policy Owner: Chief Ethics and Compliance Officer

This policy supersedes all previous policies related to preventing and responding to sexual abuse and exploitation. This policy is in addition to the [Child Safeguarding](#) and [Anti-Discrimination and Anti-Harassment](#) Policies, which cover other prohibited conduct.

Purpose

Pact is committed to preventing all forms of sexual abuse and exploitation (SEA). This policy seeks to ensure that all participants in Pact's programs are safe and not exposed to any threat or conduct involving sexual exploitation or abuse. We are committed to responding promptly and appropriately to any SEA allegations.

Applicability

This policy applies to all global employees, consultants, independent contractors, agents and volunteers ("Workers"), and visitors ("Visitors") who work on or visit Pact and Pact subrecipient programs.

Requirements

Definitions

Sexual exploitation is defined as an actual or attempted abuse of a position of power or trust, for sexual purpose. Exploitation can include profiting monetarily, socially, or politically from the sexual exploitation of another. Sexual abuse is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Examples of Prohibited Behaviors

Pact Workers and Visitors are prohibited from engaging in any form of sexual exploitation or abuse of a person participating in a Pact or Pact subrecipient program. Never engage in sexual relationships with program beneficiaries, as these relationships are based on inherently unequal power dynamics.

Examples of sexual exploitation and abuse include, but are not limited to:

- Sexual assault or abuse;
- Unwanted (without consent) touching of a sexual nature;
- Demanding sex in any context;
- Making sex a condition for aid or participation in a development program;
- Forcing someone to have sex;
- Forcing a person to engage in sex work or pornography.

Mandatory Reporting

Workers and Visitors are required to report suspicions or allegations of SEA, or noncompliance with this policy, within the first 24 hours by alerting the Chief Ethics and Compliance Officer or

by submitting a report to the [EthicsPoint Reporting System](#). Workers and Visitors should also report any historic SEA allegations from any Pact program.

All SEA reports should include the following:

- Who committed the alleged wrongdoing?
- Do you know if anyone else was involved?
- What has happened? Describe in detail what you know or suspect of a SEA incident.
- Were there any witnesses?
- When and where did the incident take place? Providing dates and time, if possible.

Employee Responsibilities

Workers must:

- Be particularly alert to suspected cases of SEA within vulnerable populations.
- Report any suspected incidents or potential signs of SEA.
- Never hesitate to report suspicions of SEA because evidence was not collected.
- Respect the dignity, wishes and rights of survivors of SEA, including their wishes on whether to report to third parties.
- Seek counsel from the Pact Office of Ethics & Compliance with questions about whether or how to report suspected cases.

Program Design

Pact workers responsible for designing, pricing, funding, and implementing programs, directly or indirectly through subrecipients, are responsible for ensuring that our agents, partners and subrecipients have PSEA policies.

Country Offices

All Pact offices are required to identify emergency or survivor support resources in their country, if possible, to use in the event that a SEA allegation is reported, and the survivor in question would like to avail themselves of those resources. The Country Director (CD) is responsible for identifying emergency and survivor support resources in their country, if possible, for addressing and reporting suspected SEA violations, and making staff members aware of those resources.

Investigations and Monitoring

The Office of Ethics & Compliance is responsible for ensuring that allegations of SEA are investigated in accordance with this policy. Throughout the investigation, Workers and Visitors are required to cooperate with the investigation. Unless otherwise required by the Office of Ethics & Compliance or law enforcement, all information must be kept confidential regarding the suspected survivor(s) and suspected perpetrator(s).

Pact's Chief Ethics and Compliance Officer and their investigators are responsible for conducting investigations of internal SEA reports to the extent local authorities are not involved. The Chief Ethics and Compliance Officer must report aggregated incident data to the Pact Senior Management Team (SMT) and to the Board of Directors on a quarterly basis. The Chief Ethics and Compliance Officer shall immediately report all exceptional cases to the SMT and Board of Directors as needed.

The Ethics & Compliance Office also is responsible for monitoring that this policy is routinely followed.

Enforcement

Sexual exploitation and/or abuse of program participants constitute acts of serious misconduct and are grounds for disciplinary action, including termination of employment and referral to law enforcement, as well as termination of subrecipient grants, if applicable. Country Offices must comply with local laws on SEA violations.

A staff member who is proven to have committed sexual exploitation and/or abuse will be dismissed from their employment with Pact and ineligible for rehire. If an allegation is made in bad faith, appropriate steps will be taken to follow up with the person who has made the allegation and the person accused. Any Worker who makes false and malicious accusations will face disciplinary action, up to and including termination.

Related Resources

- Pact is committed to upholding the United Nations Secretary General's Bulletin on [special measures for protection from sexual exploitation and sexual abuse](#) (ST/SGB/2003/13) and the [Inter-Agency Standing Committee \(IASC\) Six Core Principles Relating to Sexual Exploitation and Abuse, 2019](#).