

## **Protection from Sexual Harassment, Exploitation and Abuse (PSHEA) Policy**

### **1. Purpose of the Policy**

Africa-Asia Impact (AAI) is fully committed to maintaining the highest standards of integrity, safety and dignity in all our activities. This policy sets out AAI's principles, rules and procedures to prevent and respond to Sexual Harassment (SH), Sexual Exploitation (SE) and Sexual Abuse (SA) across our operations in Denmark, Bangladesh, Tanzania, and all project contexts.

The policy applies to:

- all AAI staff and board members
- consultants, volunteers and interns
- implementing partners and their staff
- suppliers and sub-contractors
- community facilitators and committee members
- beneficiaries receiving services or support

AAI adheres to international standards including:

UN Secretary-General's Bulletin: Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13)

UN Inter-Agency Standing Committee (IASC) Six Core Principles of PSEAH,

Universal Declaration of Human Rights,

Convention on the Rights of the Child,

Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), and relevant national legislation.

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### **2. Definitions**

#### **Sexual Harassment (SH)**

Unwelcome sexual advances, comments, gestures, requests for sexual favors, or any behavior of a sexual nature that creates an intimidating, hostile or humiliating environment.

#### **Sexual Exploitation (SE)**

Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including but not limited to transactional sex, exchanging assistance for sexual favors or exploiting someone's need for protection.

#### **Sexual Abuse (SA)**

Any actual or threatened physical intrusion of a sexual nature, whether by force, coercion or under unequal conditions.

### **Child Sexual Abuse**

All sexual activity with a child is a criminal offence and will be treated as such, regardless of local norms or consent claims.

### **Survivor-centered approach**

Responses prioritizing the rights, dignity, choices, needs, safety and confidentiality of the survivor.

See annex for more information on definitions.

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## **3. Core Principles**

AAI is committed to the following:

1. **Zero tolerance** towards any form of sexual harassment, exploitation, or abuse.
2. **Protection** of all beneficiaries, especially women, girls, marginalized groups, and ethnic minorities. This also includes locally hired project staff, who may be young, inexperienced, or otherwise vulnerable in community settings.”
3. **Survivor-centered response** to any allegation.
4. **Do-No-Harm** in all activities, services, and investigations.
5. **Power-awareness**, including addressing gender norms, inequality, and the vulnerabilities of beneficiaries.
6. **Mandatory reporting** by all staff and partners.
7. **Confidentiality**, privacy, and protection against retaliation.
8. **Accountability** for individuals and institutions.
9. **Respect** for national laws and international human rights standards.

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## **4. Prohibited Conduct**

The following are strictly prohibited:

- Sexual harassment, exploitation or abuse of any person
- Any sexual activity with a child (under 18 years)
- Asking for sex, sexual favors or sexualized communication
- Exploiting beneficiaries’ access to aid or services
- Any exchange of money, help, gifts, employment or assistance for sex
- Sexual relationships between AAI personnel and beneficiaries
- Grooming, sexualized comments or unwanted touching
- Intimidating or coercive behavior
- Pornographic materials involving minors
- Retaliation against anyone who reports misconduct
- Failure to report suspected misconduct

## **5. Roles & Responsibilities**

### **AAI Management**

- Ensure implementation of this policy
- Provide training to all staff and partners
- Ensure functioning safeguarding and complaints mechanisms
- Lead response and disciplinary action
- Guarantee confidentiality and non-retaliation
- Ensures budget for training and awareness purposes

### **Staff, Volunteers and Consultants**

- Must uphold this policy at all times
- Must complete safeguarding and PSHEA training
- Must report any suspicion, incident or breach immediately
- Must behave professionally in all interactions

### **Implementing Partners & Sub-contractors**

- Must sign and comply with the PSHEA policy
- Must conduct training for their staff
- Must maintain complaints mechanisms
- Must report all concerns to AAI within 24 hours

Non-compliance may lead to termination of partnership.

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## **6. Safe Recruitment (Vetting and Screening)**

AAI applies safeguarding in recruitment:

- Criminal background checks where legally feasible
- Reference checks focused on misconduct history
- Verification of identity and employment history
- Screening against sanctions and misconduct lists
- Mandatory signing of AAI Code of Conduct

No person with a history of SEA, SH or child abuse will be eligible to work on AAI-funded projects.

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## **7. Complaints and Reporting Mechanisms**

AAI provides multiple safe channels for reporting:

- AAI safeguarding email address
- Local project focal persons
- Partner focal points
- Anonymous reporting where possible
- Options for verbal, written or third-party reporting

Complaints may be submitted by:

- survivors

- family or community members
- staff or partners
- witnesses
- any concerned individual

### **Mandatory reporting:**

All AAI staff and partners must report concerns within 24 hours.

Whistleblowers are protected. Any form of retaliation against a person who reports in good faith is strictly prohibited.

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## **8. Response and Case Management**

AAI uses a survivor-centered, confidential, timely and safe response pathway:

1. Immediate safety assessment
2. Confidential intake and record-keeping
3. Referral to medical, psychosocial and legal services
4. Internal case review (without identifying information shared widely)
5. Investigation following due process
6. Corrective action, disciplinary measures or termination
7. Reporting to relevant authorities when required by law
8. Follow-up to ensure survivor well-being

Survivors choose whether to pursue formal complaints.

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## **9. Protection of Children and Vulnerable Groups**

Children, adolescents, women from ethnic minority groups, persons with disabilities and individuals with limited social protection face increased risk. This also includes local project staff, including young or temporary employees, who may be vulnerable due to age, status or power dynamics within communities.

AAI will:

- Prioritize protection of the most vulnerable
- Integrate gender equality and disability-inclusive safeguarding
- Ensure safe project environments (transport, meeting spaces, hours)
- Conduct community sensitization and awareness where possible

Child safeguarding is aligned with AAI's Child Protection Policy.

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## **10. Risk Assessment and Prevention**

AAI will integrate PSHEA risk assessments into:

- Project design
- Staff recruitment
- Partner selection
- Community engagement

- Monitoring and evaluation

Prevention measures include:

- Staff training
  - Safe programming
  - Gender-sensitive approaches
  - Community awareness activities
  - Strict oversight of beneficiary selection and grants
  - Supervision of staff working in isolated settings
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## **11. Confidentiality and Data Protection**

All reports and investigations are handled:

- confidentially
- securely
- in line with GDPR
- with restricted access
- using anonymized data whenever possible

No identifying information about survivors is shared without consent unless required for safety or law.

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## **12. Disciplinary Measures**

Breaches of this policy may result in:

- immediate suspension
  - termination of employment or partnership
  - reporting to donors
  - reporting to national authorities
  - prohibition from future AAI activities
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## **13. Monitoring & Review**

This policy will be:

- Reviewed every two years, or earlier if necessary
- Shared with all staff and partners
- Accompanied by mandatory training
- Updated to reflect evolving donor and legal requirements

AAI will monitor compliance through:

- audits
- partner reviews
- field visits
- safeguarding reporting
- staff interviews and training logs

## **Annex: Definitions**

### **1. Sexual Harassment (SH)**

Does NOT require physical touch.

It *can* include physical touch, but does not need to.

Sexual harassment can be:

- Words
- Looks
- Messages
- Comments
- Jokes
- Gestures
- Sexualized behavior
- Online/phone harassment
- Suggestive behavior
- Requests for sexual favors
- Unwanted invitations
- Intimidation with sexual undertones

Touch is not required.

It focuses on *environment* and *behavior*, not physical violation.

Key idea:

It's about unwanted sexual behavior that creates a hostile or humiliating environment.

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### **2. Sexual Exploitation (SE)**

May or may not involve physical touch but usually involves a power imbalance and exchange.

Exploitation means:

Using someone's vulnerability for sexual purposes, using power, aid, status, or advantage.

Examples:

- "Sex in exchange for money/help/services."
- "If you sleep with me, I will give you a grant/food/job."
- Taking advantage of someone's poverty or dependency.

It *often* includes sexual interaction, but the key is abuse of power, not physical touch.

Physical interaction is common but not required.

Exploitation is about transaction + power imbalance.

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### **3. Sexual Abuse (SA)**

Always involves actual or attempted physical sexual intrusion.

This is the most severe category.

Examples:

- Rape
- Attempted rape
- Forced touching
- Sexual acts without consent
- Physical intrusion of any kind
- Forcing someone to watch pornography
- Forced nudity
- Invasion of bodily integrity

Here, physical (or physically threatening) sexual activity is required.

It is a crime in all jurisdictions.

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**In simple terms (UN/IASC definition):**

Sexual Harassment = behavior (no touch needed)

Sexual Exploitation = misuse of power (touch possible, often but not required)

Sexual Abuse = physical sexual violation (touch required)