



Institutional policies

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Protection of beneficiaries against sexual exploitation, abuse  
and harassment

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Risk and Audit Department  
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## 1. Introduction

Through this Policy on Protection of beneficiaries from Sexual Exploitation, Abuse and Harassment (PSEAH), HI wishes to demonstrate its commitment to:

- Combat the sexual exploitation, abuse and harassment of children and vulnerable adults who benefit from or are affected by HI's work,
- Participate in this fight by continually improving diversity and inclusion in its organisation and activities, thereby reducing the risks of group domination,
- Implement a range of measures aimed at reducing these risks in its programmes, in all contexts,
- Affirm the Principle of Zero Tolerance of sexual exploitation, abuse and harassment
- Affirm the implementation of a victim/survivor-centred approach to incidents.

This policy applies to HI as an organisation as well as to anyone who works with HI, such as:

- People who have a temporary or permanent employment contract with HI,
- Families accompanying international staff,
- HI board trustees,
- Consultants or advisers,
- Interns and work-study students
- International, national or community volunteers (including un-paid ones),
- People visiting offices and field programs.

This policy applies to all situations, professional or otherwise, both at work and outside working hours.

It also applies to contractual agreements:

- Partners: non-governmental and civil society organisations, consortium's members led by HI
- Service providers / contractors and companies under contract with HI.

Through the leadership of its managers, HI ensures that everyone it works with is aware of the existence and content of the PSEAH policy. HI's senior managers are also at the forefront of driving the culture change brought about by the policy, including setting aside time in board meetings to discuss the prevention of sexual harassment, exploitation and abuse, and appointing board members as safeguarding champions.

This corporate policy on Protection from Sexual Exploitation, Abuse and Harassment (PEAHS) is part of [HI's overall safeguarding framework](#). It is linked to [the Child Safeguarding Policy \(CSP\) IP04](#) and the [Code of Conduct ID01](#). It is also consistent with the principles of promoting gender balance and diversity within the organization as set out in HI's [Disability, Gender and Age Policy](#).

This policy is based on several recognised international standards, such as:

- [IASC – SEA - 6 Core principles](#),
- [UN Secretary-General's Bulletin 2017](#): official reference framework for PSEA in UN agencies. UN Secretary-General's Bulletin [2025](#) on PSEA,
- [CHS - Core Humanitarian Standard \(PSEA Index\)](#),
- [CAPSEAH: Common approach to protection from sexual exploitation, sexual abuse and sexual harassment](#),
- [UNCRC - Convention on the Rights of Persons with disabilities](#).

On the other hand, HI respects and is generally committed to strengthening the culture, traditions and practices of the communities in which it works, and to complying with the law in all places where it operates, where this does not infringe on the fundamental rights of individuals. However, our policies and procedures may differ from local laws and impose stricter standards. The requirements of this policy take precedence where they are more stringent than local legislation and complement any other legal obligations to protect.

## 2. Reference definitions<sup>1</sup>

### Sexist behaviour

Sexist behaviour is any behaviour, comment or gesture based on sex or gender that is intended to undermine a person's dignity, perpetuate gender stereotypes or create a hostile or humiliating environment. These acts, even when isolated, contribute to the perpetuation of inequalities and create an environment that is likely to encourage abusive behaviour.

### Sexual harassment

Sexual harassment is the repeated imposition of unwanted verbal or physical conduct of a sexist or sexual nature on one or more targets, which humiliates the person or creates a hostile environment. Any pressure, even isolated pressure, to obtain sexual favours for oneself or a third party is considered sexual harassment. For example:

- Suggestions or requests of a sexual nature.
- Jokes, remarks, comments or messages of a sexual nature.
- Insistent stares, inappropriate gestures, whistling.

### Sexual abuse

Sexual abuse is any actual or threatened physical penetration of a sexual nature, whether by force or under unfair conditions. It includes rape, sexual assault, fondling and any other form of non-consensual sexual activity. Any sexual activity with a child is considered sexual abuse. Rape is sexual abuse (with a minor or an adult) involving penetration of any kind without consent.

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<sup>1</sup> This list of definitions is not exhaustive. All definitions are available in the glossary of [HI's Protection Framework \(internal document\)](#)

## Sexual exploitation

Sexual exploitation is any actual or attempted abuse of a position of vulnerability, power or trust for sexual purposes. It includes, but is not limited to, financial, social or political gain from the sexual exploitation of another person. It is a term that encompasses all forms of abuse where consent is obtained through coercion, dependence or unequal power. For example:

- Forcing a person to engage in sexual activity in exchange for help, services, employment or benefits.
- Maintaining an exploitative relationship based on an imbalance of power.
- Any form of transactional sex (including prostitution).

### 3. Principles: Prevention of Abuses

#### **Principle 1 - Preventing the risks of sexual exploitation, abuse and harassment is a shared responsibility**

Sexual exploitation, abuse and harassment of children and vulnerable adults who benefit from or are affected by the work of HI and its partners is inappropriate behaviour and is subject to sanctions, including disciplinary action. Our Code of Conduct sets out the behaviour and practices that are expected of all, setting minimum standards for the organisation and actions to be avoided.

↳ See the Code of Conduct: Integrity, Prevention of abuse and Protection of individuals

#### **Principle 2 - Taking account of age, gender and disability intersectionality in power imbalances**

Recognising the issues of intersectionality in addressing vulnerability and the existence of factors of exclusion and inequality that are more pronounced in certain populations, HI undertakes to pay particular attention to the risks of sexual abuse of children, women, people with disabilities, older people or any other group that presents a contextual vulnerability in the application of this policy.

#### **Principle 3 - Protection of minors**

Sexual relations with anyone under the age of eighteen (18) are prohibited, regardless of the age of majority or local age of consent. Ignorance of the actual age of the child cannot be used as a defence.

## **Principle 4 - Zero tolerance for transactional sex**

It is forbidden to solicit sexual favours in exchange for money, employment, goods, services or assistance of any kind. This includes prostitution and any form of transactional sex.<sup>2</sup>

## **Principle 5 - Fraternization**

Relationships between a person working with HI (as defined in the introduction to this policy) and the populations we serve are, by definition, based on an unequal balance of power. Fraternization refers to any relationship that arises in the course of our activities that involves, or appears to involve, favoritism, preferential treatment or inappropriate use of rank or position, including, but not limited to, intentional sexual behavior.

This includes a close and emotional relationship involving public displays of affection or private intimacy, as well as the public expression of intimate relationships. Where there are significant power imbalances (based on gender, age, disability, authority, social and economic inequality, etc.), the risk of fraternization is higher and, depending on the context, may be considered sexual exploitation. Employees of the organization are therefore expected to maintain a strictly professional relationship with the direct or indirect beneficiaries of the organization.

Similarly, sexual relationships with members of host communities based on power imbalance are strictly prohibited as they may undermine the credibility and integrity of HI's work and may also be considered sexual exploitation.

## **Principle 6 - Transparent and accessible reporting procedures**

HI is committed to promoting the principles of transparency and access to clear and robust reporting procedures. This includes raising awareness and training everyone who works with HI so that they understand the principles and provisions of this policy, the whistleblowing procedures and their follow-up. (Refer chapter 4.3)

## **Principle 7 – Active prevention of SEAH risks**

Anyone working with HI must consider the risks of sexist behaviour, exploitation, abuse and sexual harassment, depending on the activities and context. The strategy for reducing these risks must be an ongoing concern. Everyone working with HI, and in particular directors and managers at all levels, has a duty to create and maintain an environment free from sexist

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<sup>2</sup> An exception to this rule may be accepted in the case of transactional sexual relationships between persons with disabilities and service providers legally recognized in this role by the legal and social authorities of the country.



behaviour. These managers also have a responsibility to prevent sexual exploitation, abuse or harassment.

Tackling the culture of complacency and impunity requires constant effort. Directors and managers must be aware of this safeguarding Policy, ensure that it is applied and proactively supervise their teams.

## **Principle 8 - Protection of whistleblowers and survivors of abuse**

HI is committed to supporting whistleblowers who report behaviour contrary to this policy and to providing specific support and assistance to victims/survivors of sexual exploitation, abuse or harassment perpetrated by anyone working with HI, in line with the principle of a victim/survivor-centred approach. Victims/survivors will be informed that the responsibility of the perpetrators of sexual exploitation, abuse or harassment remains full and complete, although the internal investigation process will be conducted impartially to ensure that all parties have an equal right to be heard.

Where there is a conflict of interest between the victim/survivor and any other person involved, the wishes of the victim/survivor shall be paramount in the handling of the case, particularly where the victim/survivor is at additional risk of physical and/or emotional harm.

## **4. Implementation and procedures**

### **4.1 Recruitment, contracts, induction period**

#### **4.1.1 Recruitment**

HI implements a safe recruitment process for anyone applying for employment with HI (temporary or permanent), HI Board Trustees, consultants, interns and volunteers (all categories). This includes key information about the values and existence of the policy in job advertisements, then specific questions during interviews.

Once the candidate has been selected, a rigorous background check process is put in place. The successful candidate for an international or national position will be subject to:

- A criminal record check (subject to local legislation)
- Reference checks from previous employers, including a history of sexual harassment, abuse, exploitation or child abuse investigations in accordance with the protocol of the [Misconduct Disclosure Scheme](#) (MDS) of which HI is a member.
- A 'Bridger' check is also carried out to detect any illegal activity (candidates for field positions and certain HQ roles).

These rules also apply to community volunteers in most programmes. In some contexts, reference checks for these volunteers will need to be adapted due to security or crisis constraints (e.g. refugee workers with no accessible background, etc.). This could include a systematic check if the volunteer has already worked with another NGO or through the camp authorities.

#### **4.1.2 Contractual requirements**

All staff members working with HI are required to sign a contract which includes adherence to the [Code of Conduct](#) and institutional policies: Protection from Sexual Exploitation, Abuse and Harassment (PSEAH); [Child Protection Policy \(CPP\)](#); [Anti-Fraud, Bribery and Corruption Policy](#). Individuals who do not have a formal contract, such as volunteers or trustees, are required to sign the Volunteers or Trustees Charter, which includes to comply with the Code of Conduct and institutional policies.

**All contracts with partners** (subcontractors, implementing partners) refer to the above HI policies. Aspects relating to their own recruitment and reference procedures are an integral part of HI's partners capacity assessment to ensure alignment with standard norms.

#### **4.1.3 Induction period**

All new HI members must complete mandatory initial online training on **the Code of Conduct and Safeguarding Institutional Policies**. This training must be completed every 2 years. It is also provided in an editable format and can be translated into the local language or contextualised for local training supported by Focal Points.

In addition to this induction, HI has developed a comprehensive safeguarding training plan to provide all staff with access to the basics and to reinforce the culture of preventing and reporting abuse.

Throughout the year, the Safeguarding Unit provides various categories of training for focal points, MEAL officers, first responders to disclosures and managers. The pool of investigators also benefits from specific sessions on case management and alert procedures. In addition, several tools for training, awareness raising or individual capacity building are available on the organisation's intranet: tutorials, advice, links to external resources, etc. Finally, all staff will benefit from awareness-raising or refresher sessions on the Code of Conduct, protection mainstreaming, GBV issues, sexual exploitation of children and age, gender and disability intersectionality during the period of operation.

### **4.2 Prevention and management of SEAH risks**

HI continually assesses the risks of abuse (SEAH or child) in its organisation and implements measures to prevent and manage these risks through the following actions:

- As stated in the Recruitment and Training chapters, **the use of reference checking mechanisms and adapted recruitment processes to prevent the recruitment of perpetrators of sexual exploitation, abuse or harassment includes any abuse of children.**
- **Mainstreaming Protection** by promoting protective measures against sexual exploitation and abuse/violence against children (training, risk management, due diligence, reporting, detection and verification) into the culture, design and functioning of offices, operations and projects/programmes.
- **Understanding, reducing and managing the risk of sexual exploitation and abuse / violence against children:** the organisation regularly assesses and monitors the risk of sexual exploitation and abuse, based on an understanding of the local implementation context, the working environment and the specific vulnerabilities and needs of the affected groups. This includes an annual SEAH ranking of the countries in which the organisation works, some targeted training and awareness campaigns, some measures to reduce power imbalances and the implementation of risk assessment and prevention measures in projects (including the provision of a risk identification, management and mitigation tool). Project evaluations or satisfaction surveys are also used to monitor the effectiveness of the modalities in place and to monitor changes in programmes and operations.
- **Involvement of affected communities in designing prevention mechanisms and reporting incidents of sexual exploitation and abuse:** HI ensures that people at high risk of sexual exploitation and abuse, affected communities and others in contact with projects/programmes can report the risks of sexual exploitation and abuse they face and contribute to the design of prevention and response measures.

## 4.3 Reporting and management of incidents

### 4.3.1 Reporting

If a person wishes to raise a concern or report sexist behaviour, gender-based harassment, sexual harassment, abuse or exploitation, or violence and abuse against children, they can do so either through standardised internal reporting or through external channels adapted to each country of operation. In practice, this means reporting concerns or suspicions immediately and in good faith, without taking the initiative to investigate the matter themselves to gather evidence or prepare a report.

No sanction can be taken against a whistleblower (except in malicious cases) in accordance with HI's Whistleblower Protection Policy.

**Internal reporting:** This can be done by informing senior management verbally, by email or via the organisation's intranet.

- Alert the line manager directly or any other manager in the organisation
- Report the situation to a Safeguarding Focal Point: staff identified and trained either locally or at Head Office.
- Or report via the direct online reporting mechanism - Ethics Point - via the HI intranet or website: <https://www.hi.org/en/reporting-form>

It is strictly forbidden for any HI employee, and in particular any manager, to impose a hierarchical or single reporting channel on any other employee. Similarly, all HI managers are required to report any concerns they receive to the EthicsPoint platform.

**External reporting channels:** in each country where HI operates, a community-based feedback and complaints management system is in place for the people who benefit from the work of the organisation and its partners. This system is designed in accordance with HI's guide to setting up a feedback and complaints management system. This system is implemented with the participation of the affected populations and offers a combination of different feedback channels while ensuring the principles of a survivor-centred approach, accessibility, security and transparency.

HI's Programme Directors and Country Managers ensure that these mechanisms are in place and that communities are informed, involved and held accountable. MEAL teams, protection officers and other protection actors are directly involved in informing and raising awareness among communities and partners. They are responsible for receiving feedback and complaints through the various mechanisms, helping to consolidate data in accordance with the procedure and following up with reporters on the progress of their complaint.

#### **4.3.2 Incident management and survivor/victim-centred approach**

The organisation has a [strict whistleblowing policy](#) and a [reporting flowchart](#) based on the confidentiality and security of the collected data.

As mentioned above, all complaints relating to cases of sexual exploitation, abuse or harassment or child abuse are received directly or registered on a secure case management platform with limited access, protected by an individual password and where all data is archived (Ethics Point). The management of an incident must always respect 4 key principles: **focus on the survivor / victim, fairness of the process, professional and certified resources and structured investigations.**

As described above, HI applies the principle of a victim/survivor-centred approach. Once a safeguarding risk, suspicion, incident or allegation is reported (through existing channels), the first step required of the HI frontline worker is to treat the whistleblower appropriately

and with critical attention to the survivor (whistleblower or not). Specific operational procedures for dealing with SEAH and child abuse cases, for incidents involving our employees and contractors, are available to assist first responders in managing the situation.

Acknowledgement and initial contact is made with the whistleblower and/or survivor within 48 hours to ensure that they receive the necessary care and relevant protective measures (health, MHPSS, legal, other) from HI directly or through referral to specialist services/stakeholders. A liaison officer is proposed - responsible for following up and supporting the informant and/or survivor.

For children and young people - initial contact is made with the whistleblower and/or survivor within 48 hours and additional contact is made with the child's carer to arrange appropriate care and protection (health, MHPSS, legal, other) by HI directly or through referral to specialist services / stakeholders. A liaison officer is proposed - responsible for monitoring and supporting the survivor and caregiver (family or other).

Particular attention is paid to survivors from specific groups:

**Cases involving people with disabilities:** All cases involving people with disabilities are treated with the highest safeguards to remove barriers that prevent them from accessing the services and information to which they are entitled. First responders, liaisons and subsequent investigators tailor their communication and follow-up arrangements to the best interests of the individual. Access to appropriate healthcare (including reproductive health) is closely monitored by HI, particularly in cases of SEAH. Finally, in the case of people with mental disabilities or limited capacity to express their rights and autonomy, specific arrangements are made with the family, community or even the authorities to ensure their protection and management.

**Cases involving groups at high risk of discrimination:** Certain groups/persons are more likely to face discriminatory attitudes due to the social, religious or political norms of a community: sex workers, ethnic minorities, members of the LGBTQIA+ community. Their reports and situations are treated with the utmost guarantees of safety, protection and respect. First responders, liaison officers and investigators uphold HI's core values of non-discrimination. Specific security measures may be put in place in consultation with the HAS (HI Security Unit) where certain traditional rules or national laws may pose a significant threat to these groups.

The investigation process is conducted in accordance with the organisation's *internal investigation policy*<sup>3</sup> and in particular with the clauses relating to whistleblower protection and the survivor-centred approach. During and after the investigation process, a case

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<sup>3</sup> [HI Internal Investigation Guideline \(internal document\)](#)

management committee is responsible for, among other things, agreeing and monitoring the level of follow-up protection required for survivors, witnesses and affected community members; implementing measures to control and limit the interaction of the employee(s) subject to the complaint with survivors and witnesses; and ensuring that decisions to protect survivors are taken and implemented.

## **4.4 Suspensions and disciplinary sanctions**

### **4.4.1 Suspensions**

If an employee is the subject of a credible report of sexual harassment, abuse or exploitation of adults or children, he or she will be suspended immediately until the allegations have been investigated internally in an impartial manner and appropriate action taken. In cases where suspension is not possible due to local legislation, HI may prohibit access to the organisation's premises, equipment and activities while the allegations are investigated, and appropriate action taken. In certain cases, where premature implementation of the suspension may jeopardise the safety of the whistleblower or victim or prejudice the gathering of evidence, HI reserves the right to decide, in consultation with the investigators, the period and safeguards to be anticipated before informing the whistleblower of the suspension.

In accordance with the same principles, HI may ask its partners to suspend or sideline the person involved while it investigates and takes appropriate action.

### **4.4.2 Disciplinary sanctions**

At the end of the investigation process, the report will be submitted to the Director and the Human Resources Manager/Director of the geographical area or headquarters concerned, as well as to the Safeguarding Unit Specialist. If a breach of the Code of Conduct, the PSEAH and the Child Protection Policy is confirmed, the person(s) concerned will be disciplined in accordance with the seriousness of the misconduct and the applicable legal and internal procedures. **Disciplinary action may range from a formal verbal warning to dismissal for gross misconduct.**

For the same reasons, HI will formally request the partner organisation to take appropriate action against the subject of the complaint.

Any malicious or offensive statement made against a person holding a contract of employment with HI (temporary or permanent), family members accompanying international staff, HI trustees, consultants, trainees or volunteers may also be investigated and lead to appropriate action, including disciplinary action.

As part of its legal obligations, HI reserves the right to report matters of a criminal nature to the local authorities, respecting the rights and consent of victims/survivors and in consultation with them. In all cases HI will not interfere with local legislation and will do its utmost to ensure a fair legal process both for the survivor/victim and if a local or international staff member is implicated in a violation of their fundamental rights.

As part of its contractual obligations, HI will inform the agencies (donors) funding the project concerned of the initial receipt of the allegation and the conclusions of the investigation. This will include the decisions taken in accordance with the rules set out in the organisation's internal investigation guide (donor section).

## **4.5 Confidentiality**

Confidentiality covers both the identity of the people involved and the information shared. Victims/survivors have the right to choose to whom they wish to disclose their story.

However, they must be informed from the outset of the possible limits of confidentiality, particularly where there is a legal obligation to report, and of the possible consequences for the proper conduct of an investigation.

No information may be disclosed without their informed consent, which should specify what will be disclosed, to whom and for what purpose. No information should be disclosed without the prior consent of the individual or, in the case of a minor, his or her legal representative.

Reports must be accurately recorded, kept in a secure place and accessible only to authorised persons. The transmission of information, whether verbal or electronic, must always comply with strict data protection protocols.

In the event of an allegation involving another organisation, the Programme Director will determine the procedure to be followed with that organisation in accordance with local laws.

## **4.6 Partners**

Before entering a partnership with an organisation, HI carries out a series of checks on its ethics and capacity, particularly in safeguarding. The purpose of this assessment is to determine the extent to which the organisation's policies and practices ensure the protection of beneficiaries in a manner appropriate to their disability, gender and age, and to the nature of the activities planned. The results of this assessment are shared with the organisation and, where appropriate, joint action is taken to prevent any abuse that may be committed by its staff or members in the context of the future partnership.

HI's partnership agreements specify that partners agree to comply with this Institutional Policy, as well as those relating to child protection, anti-fraud and anti-corruption, anti-discrimination and disability, gender and age inclusion. The guidance given to members and staff is set out in the HI Code of Conduct, which is brought to their attention. Any serious breach of this policy may be grounds for termination of the partnership.

In cases where an individual working for the partner organisation is involved, the [regional] programme director or country manager will decide with the partner organisation how to deal with the matter before considering referral to a third party, in accordance with local laws.

## 5. Monitoring and assessment

The monitoring and evaluation of the implementation of the safeguarding policies (*PSEAH, Child Protection and Fraud & Corruption Policy*) is linked to the organisation's principle of transparency regarding our activities and our desire to monitor and demonstrate to our internal and external stakeholders our progress and continuous efforts to improve safeguarding practices.

These principles are firstly ensured through the effective translation of our policies into the organisation's Code of Conduct and through an implementation plan defined in the organisation's Global Protection Framework, which also includes the allocation of institutional responsibilities. This three-pillar plan (culture, people and governance) is accompanied by a set of policies, guidelines and tools for all employees of the organisation.

These policies are monitored by internal control processes that enable us to measure and report on changes in our practices over time.

An annual monitoring of 27 mandatory indicators, to be completed by all the organisation's offices and programmes, has been introduced, allowing us both to check that our actions are in line with our protection standards and to analyse the investments and resources that the organisation's key decision-makers are devoting to prevention and remediation daily.

Finally, the organisation ensures that this transparency is respected by committing to inform the relevant regulatory bodies and donors (depending on the contractual agreements signed) of any incidents of sexual harassment, abuse or exploitation that the organisation may encounter **questions on this institutional policy**.





## Protection of beneficiaries against sexual exploitation, abuse and harassment

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This paper presents the policy and measures adopted by HI to prevent and combat the sexual exploitation, abuse and harassment of beneficiary populations by humanitarian workers.

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