



Footprint to Freedom PSEA Policy

Policy Title: Protection from Sexual Exploitation and Abuse

Policy Objective:

To establish a zero-tolerance policy for sexual exploitation and abuse (SEA) applicable to all Footprint to Freedom employees and associated personnel. This policy ensures that roles, responsibilities, and expected standards of conduct regarding SEA are clearly communicated within the organization. Our goal is to create and maintain a safe environment free from SEA by implementing appropriate preventive and responsive measures both internally and within the communities where Footprint to Freedom operates.

Target Audience: All Footprint to Freedom employees and related personnel.

Effective Date: 16th August 2023

Mandatory Revision Date: 19th August 2024

Policy Statement

Sexual exploitation and abuse violate universally recognized international legal norms and standards, and are unacceptable behaviors prohibited for all humanitarian workers, including employees and related personnel of Footprint to Freedom. We uphold the highest standards of personal and professional conduct, providing assistance and services in a manner that respects and fosters the rights of beneficiaries and other vulnerable members of the local communities.

Footprint to Freedom is fully committed to a rights-based, age-, disability-, and gender-sensitive, non-discriminatory, culturally appropriate, and victim-centric approach to prevent and respond to SEA allegations.

Scope of Application

This policy outlines Footprint to Freedom's approach to prevent and respond to SEA. It applies to all employees and related personnel, including but not limited to international and locally recruited staff, daily laborers, consultants, interns, volunteers, and contractors.

The policy extends to all activities and operations of Footprint to Freedom, including any projects funded or implemented by the organization, as well as those conducted in partnership with cooperating entities. It covers situations of SEA that occur both at and away from the workplace, during and outside working hours.

Definitions



- **Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including profiting monetarily, socially, or politically from the exploitation of another.
- **Sexual Abuse:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Sexual Exploitation and Abuse (SEA):** The abuse or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, or the actual or threatened physical intrusion of a sexual nature by Footprint to Freedom personnel, their implementing partners, or other aid workers against the individuals they serve.

Commitment to PSEA

Footprint to Freedom is committed to creating and maintaining a safe environment free from SEA and will take appropriate measures to implement a robust PSEA framework, including preventive and responsive actions. This framework reaffirms our commitment to the UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13) and to achieving full implementation of the IASC Six Core Principles regarding SEA.

Six Core Principles

1. SEA by Footprint to Freedom employees and related personnel constitutes gross misconduct and grounds for termination of employment.
2. Sexual activity with children (persons under 18) is prohibited, regardless of the age of majority or consent. A mistaken belief regarding a child's age is not a defense.
3. Exchange of money, employment, goods, or services for sex, including sexual favors, is prohibited. This includes exchanging assistance due to beneficiaries.
4. Any sexual relationship between Footprint to Freedom employees or related personnel and beneficiaries of assistance or vulnerable members of the local community that involves improper use of rank or position is prohibited, as it undermines the credibility and integrity of humanitarian aid work.
5. Employees or related personnel must report any concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, regardless of their organization.
6. All employees and related personnel are obliged to create and maintain an environment that prevents SEA and supports the implementation of this policy. Managers at all levels have specific responsibilities to uphold this environment.

PSEA Framework

The PSEA framework will be adapted to the context, dynamics, and organizational structure of Footprint to Freedom. Relevant measures will be reflected in appropriate organizational policies and procedures. As necessary, we will consult beneficiaries and local communities, including at-risk groups, to ensure that the systems and measures for preventing and responding to SEA are culturally appropriate and sensitive to their vulnerabilities.

Integration of PSEA into Planning, Programming, and Operational Processes



Footprint to Freedom ensures that risks of sexual exploitation and abuse are assessed, addressed, and monitored by integrating PSEA into its planning, programming, and operational processes (e.g., strategic planning, budgeting, program cycle management) while allocating sufficient human and financial resources.

We conduct thorough and inclusive risk analyses and assessments on SEA while designing projects and programs, identifying marginalized groups at heightened risk. This may include site safety mapping, focus group discussions with beneficiaries and stakeholders (including women, local authorities, etc.), and other relevant research methods.

Recruitment Practices

Footprint to Freedom employs safe and PSEA-sensitive human resource practices during recruitment, contracting, and performance management.

- **Job Announcements:** All job postings will include a standard paragraph stating our zero-tolerance policy regarding SEA.
- **Interviews:** Recruitment interviews will incorporate questions related to ethics and PSEA.
- **Vetting:** Prospective candidates will be systematically vetted according to established screening procedures to ensure they do not pose a risk to staff or beneficiaries.
- **Self-Declaration:** Selected applicants will be required to sign self-declarations committing not to have committed SEA in the past and pledging not to commit SEA in their new role.
- **Employment Contracts:** All employment contracts will include a PSEA clause outlining the definitions and responsibilities regarding PSEA, including the duty to report SEA and cooperate in investigations.
- **HR Processes:** HR processes will align with the SEA policy, detailing reporting and response mechanisms for SEA allegations.

Organizational Management - Cooperation Agreements

Footprint to Freedom will include a standard clause in all contracts and partnership agreements requiring suppliers, contractors, subcontractors, and sub-partners to commit to a zero-tolerance policy on SEA and implement measures to prevent and address SEA.

If these entities lack appropriate policies and measures, Footprint to Freedom will assist them in developing such policies. Failure to implement preventive measures, investigate allegations, or take corrective action will constitute grounds for termination of any cooperative arrangement.

Awareness of Personnel, Including Mandatory Trainings



Footprint to Freedom is committed to ensuring that personnel understand PSEA, are aware of our PSEA systems, and know their obligations and actions to take in case of an allegation. Personnel will be informed about:

- Clear prohibitions against SEA.
- Definitions of SEA and behaviors constituting SEA.
- The obligation to report suspicions or concerns and the consequences for failing to report.
- Options for anonymous reporting.
- Protections for good-faith whistleblowers.
- Reporting channels and necessary information for proper follow-up.
- Required actions (i.e., prompt reporting and referral of survivors).

Additionally, we will ensure ongoing communication regarding PSEA obligations through reminder emails, and quarterly agenda integrations.

Reporting Mechanisms

Footprint to Freedom has established safe, confidential, and accessible mechanisms for personnel, beneficiaries, and communities (including children) to report SEA allegations. We will ensure compliance with core standards for reporting and make beneficiaries aware of these mechanisms.

Our reporting mechanisms will prioritize:

- **Accessibility:** Reports should be easily submitted by all stakeholders.
- **Responsiveness:** Timely feedback and action on reports.
- **Safety:** Protecting the anonymity and security of reporters.
- **Confidentiality:** Restricting information access to those who need to know.
- **Transparency:** Clear processes that inform all parties involved.

We will provide training to staff likely to receive complaints about relevant procedures and incident reporting. We uphold a culture of transparency and ensure that personnel and beneficiaries can report allegations without fear of retaliation.

Awareness-Raising to Beneficiaries and Local Communities

Footprint to Freedom is committed to raising awareness among beneficiaries and local communities about PSEA and our organizational systems. We will develop visual communication materials that are:

- Contextually adapted.
- Drafted in relevant local languages.
- Easily understandable by beneficiaries, especially high-risk groups.

Regular awareness-raising sessions will be organized to inform communities about:



- What PSEA is.
- Standards of conduct for the organization's personnel.
- How to make a report.
- Commitments from the organization in response to SEA incidents.

Assistance to SEA Victims/Survivors

Footprint to Freedom is committed to ensuring that any victim of SEA has access to assistance and support as soon as information about an allegation is received, regardless of the organization's decision regarding the investigation.

This policy will be regularly reviewed and updated to reflect changes in legal requirements, best practices, and organizational needs.