

The REC
POLICY & PROCEDURE
Protection from Sexual Exploitation Abuse & Harassment
(PSEAH)
Safeguarding

The Research & Evaluation Centre
email: info@therec.co.uk, website: www.therec.co.uk
Company Limited by Shares Incorporated in England and Wales

TO REPORT A SAFEGUARDING CONCERN, YOU CAN:

Visit: <https://therec.co.uk/misconduct>

Email: safeguarding@therec.co.uk

1 Introduction

The REC aims to improve lives through using evidence. Our work affects people of all ages. As a result, concern for the safety and well-being of everyone is an important part of The REC's work.

In recognising our commitment to fostering and sustaining a safe environment for all people The Rec must proactively include a safeguarding lens to its work in order to avoid potential harm to people through its presence and work in a way that focus on human rights. We aim to prevent any vulnerability that could be caused to people by our activities, those of our representatives, or partnerships. We are committed to practices which protect people from abuse, sexual exploitation and harm, and recognise the importance of having safeguarding policies. We accept and recognise our responsibilities to develop awareness of the issues which cause harm in order to prevent them.

This document sets out The REC's policy approach to preventing and addressing sexual exploitation, abuse and harassment (PSEAH). The policy herein demonstrates The REC's commitment to preventing SEAH and to ensure effective action is taken when problems occur; principles upon which our decisions and actions are based; together with our expectations of all those working on behalf of The REC. This policy should be read in conjunction with the Child Safeguarding & Vulnerable Adults safeguarding policy, which affords additional safeguards for children and vulnerable adults, and is not meant to derogate from or supersede it. The policy should also be read in conjunction with The REC's code of conduct et.,

2. Scope and Eligibility

The policy and guidance applies to all persons working on behalf of the REC in any capacity including, REC staff, directors, agency workers, seconded workers, volunteers, interns, agents, suppliers, contractors, external consultants, third party representatives, agents, business partners and any other REC representatives, both in the UK and abroad. It applies both during and outside normal working hours. This policy will apply even in the event that it is more rigorous than local laws. In countries where The REC's policy contravenes local legislation, the higher standard must be observed. at all times.

3. Policy Statement

The REC is a transparent and inclusive organisation. We believe that all people have the right to:

- be safe; no one should take this right away
- protect their own bodies; their body belongs to them
- live their lives free from sexual violence and any abuse of power regardless of age, gender, sexuality, sexual orientation, disability, religion or ethnic origin.

We also believe that any form of abuse toward people, including sexual violence, exploitation, harassment, intimidation, bullying and other forms of abuse or harm is a violation of their fundamental human rights and is prohibited behaviour within The REC.

We at The REC understand that our work may more often than not put REC employees in positions of power in relation to the communities we work with, especially women, children and vulnerable adults in situations of vulnerability. We recognise that this unequal power dynamic may result in some people exploiting their position of power for personal gain. The REC does not allow any partner, supplier, sub-contractor, agent or any individual engaged by The REC to take part in any form of sexual abuse, sexual harassment, or sexual exploitation. The REC takes a zero-tolerance to inaction approach to any such incidence of exploitation, sexual harassment or abuse within the organisation. This means that we will do everything in our power to prevent the sexual exploitation and abuse of people from happening, and will rigorously address it whenever it happens. The REC is committed to supporting survivors, implementing effective safeguarding policies, reporting, investigating, responding to, and preventing sexual harassment and sexual exploitation and abuse.

All REC partners will use this Policy in conjunction with relevant laws to make decisions about how to respond to any complaints and concerns raised. For further advice, please contact: safeguarding@therec.co.uk.

3. REC PSEAH Principles & Commitments

The REC is committed to achieving full, ongoing implementation of the Six Core Principles relating to Sexual Exploitation and Abuse as set out by the Inter-Agency Standing Committee (IASC) Working Group on Prevention and Response to Sexual Exploitation and Abuse, the Inter-Agency Standing Committee Minimum Operating Standards on PSEA and the Core Humanitarian Standard and Accountability.

3.1 The REC's Core Principles on PSEA¹ (put in footnote: the IASC Six Core Commitments on PSEA has been modified to refer to sexual harassment and "The Rec Employees and Related Personnel").

Sexual exploitation and abuse by REC Employees and Related Personnel constitute acts of gross misconduct and are, therefore, grounds for termination of employment or contract/agreement. Sexual harassment by REC Employees and Related Personnel is grounds for disciplinary action up to and including dismissal.

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 a defence

Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour by REC Employees and Related Personnel is prohibited at all times. This includes buying sex or the exchange of assistance that is due to programme participants.

Sexual relationships between REC Employees or Related Personnel and beneficiaries are forbidden. Given the contexts where THE REC operates, such relationships may be based on inherently unequal power dynamics and may undermine the credibility and integrity of REC'S work. REC Employees and Related Personnel must declare any previously existing relationships with beneficiaries to their line managers or HR focal point.

Where a REC Employee or Related Personnel develops concerns or suspicions regarding sexual abuse, exploitation or sexual harassment by a fellow worker, whether in REC or not, he or she must immediately report such concerns via the established reporting mechanisms (*see Section 5*).

REC Employees and Related Personnel are obliged to create and maintain an environment that prevents sexual exploitation and abuse and child abuse and promotes the implementation of this Policy. REC Managers at all levels have particular responsibilities to support and develop systems, which maintain this environment.

3.2 REC's Commitments

REC is fully committed to preventing and responding to sexual exploitation and abuse and sexual harassment (SEAH) as highlighted in the IASC six Core Principles above. We do this by:

a. Fostering a Safe Organisational Culture: REC will make every effort to create and maintain a safe organisational culture for all those who work for and with REC, as well as those in the communities where REC operates through robust prevention and response work, offering support to survivors, and holding those responsible for sexual harassment, exploitation or abuse to account.

b. Reporting SHEA:

- Ensure that we easily accessible channels for REC employees, related personnel, beneficiaries, and others to safely report sexual exploitation and abuse and sexual harassment.

These channels will be designed in consultation with local communities and staff to ensure that they are safe and accessible.

- Ensure that everyone who works on behalf of REC and those we serve have information about how to access safe reporting channels. This will include posting reporting procedures in local languages and regularly explaining these channels.
- Provide training and information to all REC employees and related personnel, particularly focal points for receiving complaints, to ensure they understand their obligations and how to discharge their duties should they receive a complaint. A particular emphasis should be made on confidentiality.
- Abide by external reporting requirement of the Standard Operating Procedure for Misconduct reporting. Only staff with delegated authority can report to external donor and regulatory authorities. Survivors/Victims have the right to report directly to regulatory authorities within their country. The REC will assist survivors/victims in making a report if they request this.

c. Responding to SHEA Reports:

THE REC will respond in a professional and timely manner to all concerns or allegations of sexual harassment, exploitation or abuse. All concerns or allegations will always be taken seriously, and investigated and acted upon where appropriate, in line with our safeguarding principles listed below.

Survivor Centred Approach: A survivor centred approach creates a supportive environment in which the survivor's rights and wishes are respected, prioritised, their safety is ensured, and they are treated with dignity and respect. A survivor-centred approach is based on the following guiding principles:

- **Safety:** The safety and security of survivors and her/his children is the primary consideration
- **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 survivors. Although there may be instances where an imminent threat of harm to a child or someone else may override confidentiality
- **Respect:** All actions taken should be guided by respect for the choices, wishes, rights and dignity of the survivor. The role of safeguarding teams is to facilitate recovery and provide resources to aid the survivor.
- **Non-discrimination:** Survivors should receive equal and fair treatment regardless of their age, gender, race, religion, nationality, ethnicity, sexual orientation or any other characteristic.

Robust and accountable case management: All allegations of SHEA, and subsequent follow-up, will be documented in a secure and confidential database to ensure accountability. The report will be officially acknowledged within 24 hours, and a safeguarding team will convene a case conference to assess immediate risks and next steps within 72 hours.

Investigations: The REC will carry out independent, safe, and discreet investigations using trained investigators working with The REC's Safeguarding Team(s), recognising the rights of and duty of care to everyone involved, including the complainant and/or survivor, witnesses and the subject of complaint (SoC).

Accountable decision-making: The REC will take swift and appropriate action against REC employees and related personnel who are found to have committed SHEA. This may include administrative or disciplinary action, and/or referral to the relevant local authorities if appropriate and safe to do so. An independent and gender representative decision making panel will be assigned in every investigation to ensure impartiality, transparency, and accountability. The decision making process will be subject to scrutiny by relevant SG leads and/or advisors.

Survivor Support: Survivors of SHEA are entitled to specialised support services. REC commits to refer survivors to competent support services as appropriate and available and according to the wants and the needs of the survivor. Support may include specialist psychosocial support such as counselling, medical assistance, legal counselling and access to REC's Employee Assistance Programmes (where available). Assistance will be made available regardless of whether a formal internal response is carried out (such as an internal investigation).

d. Embedding PSEA into The REC work

Safer Recruitment: In compliance with applicable laws, The REC is committed to prevent perpetrators of SHEA from being (re)hired or (re)deployed. Managers and Human Resource teams will ensure robust recruitment screening processes for all personnel, including employees, volunteers, consultants and other representatives. As part of this, all application forms, interviews and references must address Safeguarding and equality requirements and attitudes.

Safe Partnership Agreements: The REC will ensure that, when engaging in partnerships, sub-grant or sub-recipient agreements, these agreements: (i) incorporate this Policy as an attachment; (ii) include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to abide by a Code of Conduct that is pursuant to the standards of this Policy; and (iii) expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against sexual exploitation and abuse and sexual harassment, to investigate and report allegations thereof, or to take corrective actions when SHEA has occurred, shall constitute grounds for The REC to terminate such agreements.

Staff and partner training: The REC employees and related personnel must receive as part of their induction training on PSEA and Safeguarding when they join The REC, including a briefing on REC'S policies and values, the Code of Conduct, information about how to report concerns, and advice about where to seek further information about safeguarding and safer practices across the organisation. Anyone working directly with beneficiaries on behalf of The REC must receive additional training on how to receive complaints and handle them in a safe and confidential manner.

Accountability: The REC commits to promoting accountability towards the individuals and the communities where we work with by: (i) being transparent about The REC's programming, activities, and services they are entitled to; (ii) raising awareness about The REC's Code of Conduct, safeguarding policies, and reporting channels; (iii) actively seeking feedback from communities on The REC's work, individual behaviours, and complaints; and (iv) presenting feedback to communities on what changes have been made resulting from community feedback – ideally by a senior The REC representative. The above steps should occur regularly throughout the lifecycle of the programme or activity.

Safe Programming: The REC employees and related personnel are required to take proactive measures to avoid causing inadvertent harm to civilians, contribute to actively reduce existing threats and ensure programmes are conflict sensitive. This includes embedding good practice and SHEA prevention measures throughout the programme and project cycle, including project design, grant proposals, assessments, complaints and feedback mechanisms, and monitoring and evaluation.

4. Role & Responsibilities

It is the duty of all REC employees and related personnel to adhere to this policy. Everyone working on behalf of The REC is required to report any suspicions or incidences of SHEA of others (see section 5 below). Failure to report to a relevant person suspicion of SHEA relating to someone else is a breach of The REC's policy, and could lead to disciplinary action being taken against employees and the termination of The REC's relationship with non-employees. There is no obligation for an individual to report any incident that has happened to them.

Directors: The REC Directors staff hold overall accountability for this policy and its implementation.

The Compliance lead for REC's safeguarding policy will initially be responsible for investigating any concern that is encountered, reported or discovered in relation to safeguarding. The Lead also works to **raise** awareness and promote best practice by receiving concerns, supporting survivors and reporting concerns in a confidential manner.

The Lead is also responsible for: promoting awareness of this policy throughout the REC; and supporting/developing systems that create and maintain a safe working environment. This also includes the responsibility for ensuring that all staff and related personnel receive regular PSEA trainings, with a particular emphasis on staff who are in direct contact with the people we serve.

Program Teams: Consult with beneficiaries (*in a safe, accessible, and culturally appropriate way*), to ensure that beneficiaries and those working on behalf of The REC are familiar with The REC's Code of Conduct, how to raise complaints and concerns, and that The REC will take action when this happens. Programme Teams should also clearly explain what goods and/or services the beneficiaries are entitled to and how beneficiaries are selected.

The Compliance lead is responsible for reviewing and updating this policy annually. This will be in line with legislative and organisational developments, feedback and lessons learned.

5. Raising a complaint or concern

The REC employees and related personnel have a responsibility to report any suspicion or concern of SHEA. Any individual can raise a concern/complaint to The REC about an incident they have experienced, witnessed, or heard about concerning a REC staff member or partner (suppliers, partners, contractor, etc.) without fear of retribution. The REC employees and related personnel *must not* investigate allegations or suspicions themselves. Investigations are carried out by professions with experience in the field of SEAH. Decisions about a case concerning a child should be made in conjunction with their parent/guardian wherever possible.

5.1 Reporting Channels

Anyone can raise a concern or make a complaint to The REC about something they have experienced or witnessed without fear of retribution. This can be done verbally or in writing to the REC's Safeguarding Team or using the whistleblowing helpline service:

<https://threc.co.uk/misconduct>. If you do not wish to use the online web-form for reporting, or if you simply prefer, you can email to: safeguarding@therec.co.uk which is available to everyone. Employees can also choose to raise concerns directly to the Director.

5.2 Confidentiality

Complaints can be made anonymously. Every effort will be made to maintain confidentiality throughout the complaints process. Information that identifies individuals involved in a complaint will be limited to essential personnel and will not be shared further without obtaining the informed consent of those involved, except if someone's life is at risk, a child is at risk, or as required by law in consultation with legal counsel and where safe to do so. Non-identifying information will be shared as per reporting requirements.

Staff involved in the complaints process will be made aware of the importance of maintaining confidentiality and may be asked to sign a confidentiality agreement. Employees who breach confidentiality may be subject to disciplinary action up to and including termination of employment, and others who work with The REC may have their relationship with The REC terminated. In some cases, such breaches may constitute breaking the law.

5.3 Retaliation

The REC will take action against anyone, whether they are the subject of a complaint or not, who seek or carry out retaliatory action against complainants, survivors or other witnesses. Employees may be subject to disciplinary action, up to and including termination of employment. Others who work with The REC may have their relationship with The REC terminated.

5.4 Complaints about The REC's Partners

Where The REC receives a complaint about a partner organisation, The REC will expect the partner to respond safely, quickly and appropriately. The REC will assist the partner to ascertain its reporting obligations.

Where appropriate, The REC will work with the partner to address the issue through an appropriate independent investigation. If the outcome is that abuse has occurred, ongoing work with the partner cannot involve the individual(s) concerned. If there is reason to believe that an allegation of abuse has been dealt with inappropriately by a partner, then they risk withdrawal of funding or ending the relationship (including networks and consortia).

5.5 Receiving Complaints about External Organisations/Bodies

Safeguarding complaints raised to The REC about other organisations/bodies should be referred to the affiliate safeguarding teams, who will report cases to the relevant organisations involved where safe to do so, as well as local PSEA working groups, networks, and/or the charity commission/police/donors where appropriate and safe to do so. The REC will not investigate cases related to other organisations, but does have an obligation to report.

6. Definitions

The REC Employees and Related Personnel: The term “The REC Employees and Related Personnel” includes all employees of The REC and, The REC Affiliates. The term also includes board members, volunteers, interns, and international and local consultants, day labourers, in addition to individual and corporate contractors of these entities and related personnel. This includes non-REC entities and their employees and individuals who have entered into partnership, sub-grant or sub-recipient agreements with The REC.

Sexual Harassment: Any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another. Such conduct will be also be considered sexual harassment when it interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. While typically involving a pattern of behaviour, it can take the form of a single incident. Sexual harassment may occur between persons of the opposite or same sex. Both males and females can be either the victims or the offenders.

Sexual Exploitation: 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. The REC recognises that the terms sexual abuse and exploitation represent a wide spectrum of behaviours and is not limited to the act of sexual intercourse.

Sexual Abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This would include forced marriage and sexual slavery and also includes sexual activity with a child (any person under the age of 18)

Sexual Relationship: Includes but is not limited to a staff member or related personnel having a physically intimate relationship, or an online sexually related relationship via social media, text or telephone.

Sexual Favour: Sexual acts, often in exchange for something such as money, goods or services, including inappropriate photography and filming. The process of sexual favours often takes place through transactional sex. Transactional sex is a common coping mechanism among people in severe-situations or vulnerability.

Child: Any person under the age of 18.

PSEA: Prevention of Sexual Exploitation and Abuse

Child Sexual Abuse: When a child is used by another child, adolescent or adult for his or her own sexual stimulation or gratification. Sexual abuse involves contact and non-contact activities which encompasses all forms of sexual activity involving children, including exposing a child to online child sexual exploitation material, or taking sexually exploitative images of children.

Survivor: The person who it is alleged has been the subject of sexual harassment, abuse or exploitation.

Complainant: The person who raises a complaint (this may or may not be the survivor).

Subject of Complaint/Subject of Concern/ SoC: The person against whom the allegation, complaint or concern has been raised.

Suspicion of misconduct: A concern that has been raised through any of the reporting pathways. This suspicion is assessed at an initial case conference / stakeholder panel.

Allegation of misconduct: If, at case conference / stakeholder panel stage there is a decision to investigate the suspicion of misconduct then it is treated as an 'allegation of misconduct'.

Outcome of Investigation: Once an allegation is investigated and the investigation report is reviewed, the resulting recommendations are referred to as the 'outcome of investigation'.

Beneficiary of direct assistance: Any person who receives assistance – including any types of goods and services – from The REC or partner organisations; regardless of the length of time of The REC's relationship with them

Communities in which we work: Any geographical location in which The REC directly or indirectly operates in, providing goods and services.

7: Related REC policies, procedures & Issues

Please note that this policy is named in line with the internationally used and recognised term 'PSEA'; however, it covers sexual harassment as well as sexual exploitation and abuse (SHEA). This policy does not form part of an employees' terms and conditions of employment and may be subject to change at the discretion of management.

Please visit: <https://therec.co.uk/policies> for current safeguarding policies and procedures and other related documents. These include though not limited to:

Code of Conduct

Child & Vulnerable Adult Safeguarding Policy

Whistle Blowing Policy

Anti-Fraud & Anti-Corruption Policy

Modern slavery and human trafficking policy

Conflict of Interest Policy

8: Version Control

This policy will be reviewed every 2 years or earlier as required with legislation or external changes. Existing policies that need to be reviewed, must comply with this policy on Organisational Policies.

Version	Summary of Change	Approved by	Approval Date	Revision Date
1	New Policy	Safeguarding Team	01 Oct 2024	01 Oct 2025