



CS-SUNN

Civil Society-Scaling Up Nutrition In Nigeria

**PROTECTION FROM SEXUAL EXPLOITATION
AND ABUSE (PSEA) POLICY**



ACKNOWLEDGEMENT

CS-SUNN would like to express our special thanks and gratitude to all those that worked tirelessly to ensure that the development and adoption of this policy was actualized starting with our Board of Trustees, the Steering Committee, Staff at the National Secretariat and our Consultant who provided the needed legal insights.

AUTHORIZATION

Author:	CS-SUNN
Reviewed By:	Steering Committee
Approved By:	Steering Committee
Targeted Audience:	All CS-SUNN employees, members, partners, vendors, consultants and volunteers.
Effective Date:	01 – 08 – 2020
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POLICY OBJECTIVE

To promulgate policy of zero tolerance for sexual exploitation and abuse (SEA) for all CS-SUNN employees and related personnel and ensure that roles, responsibilities and expected standards of conduct in relation to SEA are known within CS-SUNN To create and maintain a safe environment, free from SEA, by taking appropriate measures for this purpose, internally and in the communities where CS-SUNN operates, through robust prevention and response work.

1. Policy statement:

1.1. SEA violates universally recognized international legal norms and standards and are unacceptable behaviors and prohibited conduct for all humanitarian workers, including CS-SUNN employees and related personnel².

1.2. CS-SUNN has a policy of zero tolerance towards SEA. All CS-SUNN employees and related personnel² are expected to uphold the highest standards of personal and professional conduct at all times, and to provide humanitarian assistance and services in a manner that respects and fosters the rights of beneficiaries and other vulnerable members of the local communities.

2. Scope of application:

2.1. This policy sets out CS-SUNN approach to prevent and respond to SEA. The policy applies to all employees and related personnel, both on-and off-duty.

3. Definitions³:

3.1. For the purposes of the present policy the term **‘sexual exploitation’** means 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.

3.2. Similarly, the term **‘sexual abuse’** means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

¹ UN Secretary General's Bulletin ST/SGB/2003/13, 2003. <https://undocs.org/en/ST/SGB/2003/13>

² The term "related" personnel include, for example, sub-contractors, consultants, interns or volunteers associated with or working on behalf of CS-SUNN.

³ Both definitions are adopted from the Secretary General's Bulletin ST/SGB/2003/13, 2003. <https://undocs.org/en/ST/SGB/2003/13>



4. Commitment to PSEA:

4.1. CS-SUNN will make every effort to create and maintain a safe environment, free from SEA, and shall take appropriate measures for this purpose in the communities where it operates, through a robust PSEA framework, including prevention and response measures.

4.2. This PSEA framework, affirms CS-SUNN commitment to the UN Secretary General's Bulletin on Special Measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13) and to achieving full, ongoing implementation of the IASC Six Core Principles relating to SEA⁴.

5. Six core principles⁵:

5.1. SEA by CS-SUNN employees and related personnel constitute acts of gross misconduct and are therefore grounds for termination of employment⁶.

5.2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense.

5.3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to beneficiaries.

5.4. Any sexual relationship between CS-SUNN employees or related personnel and beneficiaries of assistance or other vulnerable members of the local community that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.

5.5. Where a CS-SUNN employee or related personnel develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same organization or not, he or she must report such concerns via established reporting mechanisms.

5.6. All CS-SUNN employees and related personnel are obliged to create and maintain an environment which prevents SEA and promotes the implementation of this policy. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

⁴ IASC Six Core Principles; available at: <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>.

⁵ Modified for the purposes of this PSEA policy. These acts are not intended to be an exhaustive list.

⁶ Including all other forms of contractual agreements, such as for example volunteer assignment.



6. PSEA framework:

6.1. Prevention:

6.1.1. Vetting: CS-SUNN systematically vets all prospective job candidates in accordance with established screening procedures.

6.1.2. Training: CS-SUNN holds mandatory induction and refresher trainings^[1] for all employees and related personnel on the Organization's SEA policy and procedures.

6.2. Response:

6.2.1. Reporting: CS-SUNN has safe, confidential and accessible mechanisms and procedures for personnel, beneficiaries and communities, including children, to report SEA allegations that and ensures that beneficiaries are aware of these.

6.2.2. Investigation: CS-SUNN has a process for investigation ⁶of SEA allegations in place and shall properly and without delay conduct an investigation of SEA by its employees or related personnel or refer to the proper investigative body if the perpetrator is affiliated with another entity.

6.2.2.1. Referral to National Authorities: If, after proper investigation, there is evidence to support allegations of SEA, these cases may be referred to national authorities for criminal prosecution.

6.2.3. Victim assistance: CS-SUNN has a system to promptly refer SEA survivors to available services, based on their needs and consent.

6.3. Cooperative arrangements:

6.3.1. All CS-SUNN contracts and partnership agreements include a standard clause requiring contractors, suppliers, consultants and sub-partners to commit to a zero-tolerance policy on SEA and to take measures to prevent and respond to SEA.

6.3.2. The failure of those entities or individuals to take preventive measures against SEA, to investigate allegations thereof, or to take corrective action when SEA has occurred, shall constitute grounds for termination of any cooperative arrangement.

⁶ The training includes at a minimum: 1) a definition of SEA (that is aligned with the UN's definition); 2) a prohibition of SEA; and 3) actions that employees and related personnel are required to take (i.e. prompt reporting of allegations and referral of survivors).

STAFF ATTESTATION PAGE

I..... declare that I have read and sufficiently understood this policy. I solemnly commit to abide and be subjected to the principles and provisions of this policy.

Signature:

Date:



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