



# PLAN INTERNATIONAL, INC.

## PREVENTING SEXUAL HARASSMENT, EXPLOITATION AND ABUSE (PSHEA) POLICY

<b>Functional Area</b>	Executive and Governance Department
<b>Business Owner</b>	Plan International, Inc. Global Safeguarding Unit
<b>Approved by</b>	International Board
<b>Approval date</b>	October 2020 ( <i>editorial revision May 2024</i> )
<b>Effective date</b>	October 2020
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<b>Applicability and Exceptions</b>	PII
<b>Related Policies</b>	Global Policy on Safeguarding Global Policy on Values Conduct and Whistleblowing Global Policy on Gender Equality and Inclusion Harassment, Bullying and Discrimination Policy (PII Policy) Grievance Policy (PII Policy) Disciplinary Policy (PII Policy) Whistleblowing Policy (PII Policy) PII Code of Conduct

# 1. APPLICATION AND SCOPE

- 1.1 This policy applies to Plan International Inc. (PII) and all of its country offices, Regional Hubs and Liaison Offices whether operating through a branch registration or through a subsidiary.
- 1.2 The Policy applies to all **Staff**<sup>1</sup> (regardless of nature and terms of association or contract), **Associates**<sup>2</sup> and **Visitors**<sup>3</sup> who must comply with its requirements and understand the sanctions that may be applied for breaches of this Policy.
- 1.3 In line with the Global Policy on Values, Conduct and Whistleblowing, which includes the Code of Conduct and the **Safeguarding**<sup>4</sup> Code of Conduct, this policy is binding on staff both in and outside of working hours and in all aspects of a staff member's life. All staff Associates and visitors can raise a complaint via the procedures outlined in this policy.
- 1.4 Individual Country Offices, Global and Regional Hubs or Liaison Offices may enact their own procedures which must be in line with PII Safeguarding procedures, regulations, or other regulatory documents, that enable compliance by its employees (and/or, when appropriate, contractors and other partners) with this policy. Where required by law or local practices, Country Offices, Global and Regional Hubs or Liaison Offices may enhance the standards and requirements set out in this policy.
- 1.5 Under this policy, any concerned person, **child**<sup>5</sup>, member of a community where Plan International works and/or **Programme Participant**<sup>6</sup>, Staff, Associate or Visitor has the right to report any concerns, allegations or suspicions of **Sexual Harassment**<sup>7</sup>, **Exploitation**<sup>8</sup> or **Abuse**<sup>9</sup> (SHEA).

## Reach

The protective scope of this Policy covers:

- all children, those aged under 18, regardless of their association with Plan International or our programmes/projects; and
- any child or adult who is the target of, or who we know will be immediately affected by, one or more Plan International associated projects or initiative outputs, hereafter referred to as programme participant..
- Any Plan International Staff, Associate or Visitor who are at risk of, or experience, any form of sexual harassment, exploitation and abuse arising from their engagement with Plan International.

**Sexual violence**<sup>10</sup> against any child or programme participant, is against, not only the values and principles we uphold as described in this Policy, but also in direct opposition to the aims of our work. We are also committed to creating safe working environments where staff, associates or visitors are free from sexual violence perpetrated by anyone engaged in our activities. It is therefore imperative to our mandate to ensure that children,

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<sup>1</sup> Individuals who receive a regular salary for work in any Plan International Entity as well as individuals paid by or through a Plan International Entity but located in another entity. Please see Appendix 1 for a full definition.

<sup>2</sup> A range of contracted paid and non-paid individuals who have committed to work with or support a Plan International Entity. It includes, among others, board members, volunteers (including community volunteers), interns, sponsors, researchers, donors, consultants and contractors, staff and/or representatives of partner organisations and local governments (when operating in partnership agreement with a Plan International Entity). Please see Appendix 1 for a full definition.

<sup>3</sup> A range of persons who are visiting our offices or programmes/projects and may come into contact with children and young people through a Plan International Entity. A visitor may be a journalist, media, researcher, visiting sponsor or celebrity. Please see Appendix 1 for a full definition.

<sup>4</sup> The responsibilities, preventative, responsive and referral measures that we undertake to protect children and programme participants, ensuring that no child or programme participant is subject to any form of harm as a result of their association with the organisation. Please see Appendix 1 for a full definition.

<sup>5</sup> Any person – girl, boy, young woman, young man, and children of other gender identities - under the age of 18 years (UNCRC Article 1). Please see Appendix 1 for a full definition.

<sup>6</sup> Any child or adult that is the target of, and that we know will be immediately affected by, one or more project or initiative output; irrespective of whether these are delivered directly by Plan International or by partners or organisations who are acting on behalf of Plan International. Please see Appendix 1 for a full definition.

<sup>7</sup> Unwelcome sexual advance or an unwelcome request for sexual favours or engages in other unwelcome conduct of a sexual nature, or indecently exposes themselves. See Appendix 1 for full definition.

<sup>8</sup> Any actual or attempted Abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from Sexual Exploitation of another.

<sup>9</sup> The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Please see Appendix 1 for a full definition.

<sup>10</sup> The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Please see Appendix 1 for a full definition.

programme participants, staff, associates and visitors, do not experience any form of sexual violence through or because of their engagement or association with us or our programmes/projects, events, and processes.

Note that for Plan International the term safeguarding includes **protection from/preventing sexual harassment, exploitation, and abuse (PSHEA)**. Plan International commits to preventing and responding to sexual harassment, exploitation and abuse through this policy which should be read in conjunction with:

- Plan's Global Policy on Safeguarding 'Say Yes! To Keeping Children and Programme Participants Safe and Protected' which provides our clear and explicit stance on **any** form of harm, exploitation or violence<sup>11</sup>, **including** SHEA, against children and programme participants.
- PII's Harassment, Bullying and Discrimination Policy and Code of Conduct, which details our clear stance on **any** form of harm, exploitation, violence, **including** SHEA, by staff against other Staff, Associates, Visitors or others.

We acknowledge the need to consider gender, intersectionality<sup>12</sup> and varying social identities thoroughly while implementing this Policy. We must ensure that our PSHEA approach and response to PSHEA concerns uphold a gender and intersectional lens. Gender Responsive Intersectional Safeguarding (which includes PSHEA) is an approach that takes full account of an individual's gender and overlapping social identities and experiences to understand the complexity of the prejudice and/or inequality they face, or conversely, how this may lead to heightened privilege. We use this understanding to identify and respond to an individual's specific safeguarding needs. Our risk assessments; project and programme designs; and safeguarding measures must fully consider and be aware of cultural/societal norms and all intersecting vulnerabilities. See Appendix 2 of this policy for more information on intersectionality.

## 2. PURPOSE

Plan International recognises that sexual violence is prevalent throughout the world and in all societies. Furthermore, children and adults may be vulnerable and at greater risk of violence due to their intersecting identities, for example, due to their gender, sexual orientation, ethnic origin, disability, age or illness.

The purpose of this policy is to ensure that all staff, Associates and visitors understand:

- the importance of PSHEA and their responsibility to ensure that they, their behaviour and work does not result in sexual violence or harm against a child, programme participant, a member of staff, Associate or visitor.
- their role in PSHEA, and the consequences of breaching this policy.
- their responsibility to report any concerns relating to SHEA and have access to clear guidelines on how to report suspected Abuse.
- our commitment to upholding the highest level of personal and professional conduct amongst staff, Associates and visitors working in or visiting programming contexts, particularly humanitarian settings where vulnerabilities are increased, ensuring zero tolerance to inaction on reports of any and all forms of SHEA.

## 3. POLICY STATEMENT

We are fully committed to:

- *Creating a safe and inclusive culture that allows children, programme participants, staff, associates and visitors to thrive and feel secure while engaging with Plan International; and supports people to understand, exercise their rights and report any concerns. We also promote the active involvement of children and programme participants in their own protection.*

<sup>11</sup> "Violence" against a child, young person or adult includes all forms of physical or mental violence, injury or Abuse, neglect or negligent treatment, emotional ill-treatment or psychological violence, Sexual Abuse and Exploitation, harassment, and commercial or other Exploitation. Please see Appendix 1 for full definition of violence.

<sup>12</sup> Intersectionality is a theoretical framework for understanding how aspects of a person's social and political identities (e.g., gender, sex, race, class, sexuality, religion, disability, physical appearance, programme participant, etc.) intersect, overlap, and compound to create interdependent forms of discrimination and privilege. Please see Appendix 1 for full definition of Intersectionality. You can also see Appendix 2 for more information.

- *Addressing the drivers of gender inequality and unequal power relations that can lead to sexual harassment, sexual exploitation and sexual abuse (SHEA) through gender responsive intersectional protection of all children, programme participants, staff, associates and visitors from all forms of sexual violence by staff, associates and visitors.*
- *Strengthening, cultivating and sharing the capacity of all staff, associates and visitors so they understand, and are supported in meeting, their safeguarding roles, responsibilities, and their duty to do no harm. We take positive action to prevent anyone who might be a risk to children and programme participants from becoming involved with us.*
- *Promoting child, programme participant and workplace safe practices, approaches, interventions and environments which respect, recognise and respond to the specific safeguarding needs and the different protection risks faced by children, programme participants and staff based on their gender and other identities. We will challenge and do not tolerate inequality, discrimination or exclusion.*
- *Encouraging, facilitating and receiving all reports related to SHEA concerns. We are committed to ensuring appropriate, adequate and accessible mechanisms for reporting are in place for staff, associates, children, programme participants and communities at large.*
- *Responding in a timely, effective, safe, comprehensive, procedurally fair and confidential manner to all SHEA complaints, allegations and incidents, ensuring victims'/survivors' perspectives, voices and best interests are central to any efforts to prevent and respond to any SHEA concern and providing necessary support to victims/survivors. We have zero tolerance to inaction on SHEA reports.*

## Policy Position

- 3.1 As Sexual Harassment, Exploitation and Abuse (SHEA) is a high impact area amongst safeguarding risks, this policy sets out clear expectations and measures the organisation will take to prevent SHEA and ensure immediate action is taken in regard to reporting and responding to SHEA allegations.
- 3.2 We recognise that the organisation's culture informs all aspects of our work, behaviour and the experience of our **stakeholders**<sup>13</sup>. We are dedicated to building a culture free from abuse, discrimination, and harm.
- 3.3 We recognise that many forms of violence are rooted in abuses of power. This is especially apparent within the power imbalances inherent in the international aid sector, and within the wider social norms and structures in which we work. As a large international organisation, those working within Plan International have increased power. We prohibit sexual or romantic relationships between Staff, Associates and Visitors where these are, or could be, an abuse of power e.g. managers with staff in their line of management. Staff are responsible for disclosing the fact that they are in a relationship which may be perceived as giving rise to a conflict of interest or breach of confidentiality to their Line Manager and/or HR manager.

The organisation also has a duty to prevent and respond robustly to allegations of SHEA.

- 3.4 We recognise that gendered forms of SHEA disproportionately impacts women and girls, and our work recognises the impact on boys, men, transgender communities and gender non-binary people. We are committed to working with marginalised and oppressed groups, recognising the impact of SHEA on people living in poverty and people of different ethnicities, religions, race, class and abilities. We will listen to and learn from them and work to ensure that our Preventing Sexual Harassment, Exploitation and Abuse (PSHEA) and Safeguarding approaches supports the work they do to promote their rights and live lives with dignity. We are committed to **Gender Responsive, Intersectional Safeguarding**<sup>14</sup>, ensuring that all people, in all their diversity, who come into contact with, or are engaged by, Plan International Inc. through our work in humanitarian and development contexts are safe from abuse of that power and privilege.
- 3.5 Our overarching Safeguarding approach and policy positions related to safeguarding children and programme participants are outlined in the *Global Policy on Safeguarding; Say Yes! To Keeping Children and Programme Participants Safe and Protected* (hereafter referred to as the Safeguarding Policy).

<sup>13</sup> "Stakeholder" is any person, organization, social group, or society at large that has a stake in our work, this can include our programme participant's communities, governments and donors.

<sup>14</sup> Our Safeguarding approach recognises an individual's combination of social identities such as age, sex, gender, gender identity, sexual orientation, disability and more come together to influence a person's risk of harm. We also recognise and do not deny the impact of dominance, power relations and the very 'human' condition of biases on the desire to 'do no harm'. Our safeguarding approach seeks to address this in a way that positively manages and brings consciousness to actions and decisions and ensures equality and inclusion and safety and dignity to children, programme participants and others of differing gender and other intersecting identities. Please see Appendix 1 for a full definition. PII Policy Preventing Sexual Harassment, Exploitation and Abuse (PSHEA).

- 3.6 Our overarching **workplace safeguarding**<sup>15</sup> approach and policy positions related to behaviours carried out between staff and Associates are outlined in the *Global Policy on Values Conduct and Whistleblowing*, the *PII Code of Conduct* and the *PII Harassment Bullying and Discrimination Policy*.

## 4. APPLICABLE REQUIREMENTS

Plan International's values outline how we should work to secure the changes we want to see in the world and to achieve our purpose. Our Values and Behaviours Framework, underpinned by feminist leadership principles, describes in practical terms, how we need to behave to live those values and deliver our leadership commitments and strategy. Our commitment to preventing sexual harassment, exploitation and abuse (PSHEA) and the application of this policy is driven by our commitment to these values and the following set of guiding principles.

### Guiding Principles

Plan International upholds the Inter-Agency Standing Committee (IASC)<sup>16</sup> Six Core Principles relating to Sexual Abuse and Exploitation. These principles guide our approach to preventing and responding to sexual harassment, abuse and exploitation, including the measures we take to prevent and respond to SHEA and the standards contained within the PSHEA Code of Conduct (Annex 1). Plan International has also adopted the following guiding principles which support our work on safeguarding, including PSHEA:

#### 4.1 Indisputable Rights

Plan International respects and upholds the rights of all children, programme participants, staff and others irrespective of any identities they may hold including their: age, sex, gender, gender identity, sex characteristics, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, any history of conflict with the law or any other aspect of their background or identity. Inequality, exclusion, and discrimination will be challenged and will not be tolerated.

All children under 18 years have equal rights to protection from all forms of violence as declared in Article 19 of the United Nations Convention on the Rights of the Child. In addition, the Universal Declaration of Human Rights recognises fundamental human rights, the dignity, worth and equal rights of people at any age.

All children and programme participants must be empowered and encouraged to fulfil their potential. Decisions made about children and programme participants in relation to their risk, or experience, of SHEA will be made as far as possible with their participation and in their best interests giving full consideration to how such decisions will affect them. Children and programme participants will be encouraged to express their views and will be given 'due weight' in accordance with their age and level of maturity.

#### 4.2 Zero Tolerance for inaction

Plan International believe that any form of violence is unacceptable and inaction on reports of SHEA will not be tolerated. We recognize that zero tolerance does not mean there will be no reports or incidents, nor does it mean that all reports of breaches will result in termination of contracts or employment without due process and **Investigations**<sup>17</sup>. Instead, zero tolerance for inaction means:

- We will act on all safeguarding and SHEA concerns and allegations, ensuring that our actions are timely, appropriate, and centred on the best interest of the **Victim/Survivor**<sup>18</sup>, taking into account their specific safeguarding needs and vulnerabilities.
- We will take all concerns and reports of SHEA seriously and we will act on these reports immediately, with the highest priority, and in accordance with the guiding principles and our procedures. Where investigations are launched, they will be carried out by experienced and qualified professionals who are trained on sensitive trauma focused investigations and a victim/survivor centred approach.

<sup>15</sup> "Workplace Safeguarding" refers to the responsibilities, preventative, responsive and referral measures that we undertake to protect our staff, Associates and Visitors from harm as a result of their work or association with the organisation.

<sup>16</sup> Created by United Nations General Assembly [resolution 46/182](#) in 1991, the **Inter-Agency Standing Committee (IASC) is the longest-standing and highest-level humanitarian coordination forum** of the United Nations system. It brings together the executive heads of 18 organizations and consortia to formulate policy, set strategic priorities and mobilize resources in response to humanitarian crises.

<sup>17</sup> "Investigation" is a process designed to gather information in order to determine whether wrongdoing occurred and, if so, the person(s) responsible

<sup>18</sup> "Victim" is a term often used in the legal and medical sectors. 'Survivor' is the term generally preferred in the psychological and social support sectors because it implies resiliency. We use both terms as part of our survivor-centred approach and allow those affected to choose the term they prefer.

- Reports constituting criminal offences will be referred to the relevant authorities, taking into account the wishes of an adult victim/survivor, the best interest assessment of a child victim/survivor and the safety of all parties.
- No one will be victimised for making a complaint which is made without malice or for personal gain. Plan International is committed to working with **complainants**<sup>19</sup> and victims/survivors to ensure they are central to any response, are not further harmed or disempowered by any processes, and receive support throughout.
- Reports can be made using the relevant and/or country specific procedures. All staff, visitors and associates must be made aware of the procedures.
- Reports can also be made anonymously in accordance with Plan International's Whistleblowing Policy.
- Reports which are malicious will be sanctioned appropriately.
- Reports pertaining to donor funded project or programme, with contractual reporting obligations, will be reported to the respective **National Organisation**<sup>20</sup> or Country Office by the Global Safeguarding Unit.

*Please see Appendix 3 for SHEA incident reporting chain*

### 4.3 Survivor-Centred Responses and Support

All decisions and actions in response to Safeguarding and PSHEA concerns and allegations and breaches of this policy will be trauma informed: Plan International will recognise the potential and actual impacts of trauma and aim to prevent re-traumatisation. We will be guided by the safety, rights, needs, wishes and empowerment of the victim/survivor, while ensuring procedural fairness to all parties. We will retain the privacy and dignity of the victim/survivor by maintaining confidentiality (within the limits of responding to the report), treating them respectfully, involving them in decision making, as appropriate, and providing comprehensive information and committing to referrals and assistance to support the recovery and safety of the victim/survivor.

Referring incidents of a potentially criminal nature to law enforcement or relevant authorities will be done after taking into account the wishes of an adult victim/survivor, the best interest assessment of a child victim/survivor and the welfare and safety of all parties. Where local or national laws mandate Plan International to report a potential crime to the police or welfare authorities an appropriate safety plan that manages the risks for all concerned must be implemented.

#### Support options

- Support will be offered to Victims/Survivors and complainants according to our survivor-centred approach and regardless of whether a formal response is carried out (e.g. an investigation).
- Support will also be offered as appropriate to others involved in an incident management process, recognising the impact this can have, for example on witnesses and those accused of carrying out inappropriate or harmful behaviours. This can include specialist psychosocial counselling, medical support, legal support and/or access to other specialist and appropriate support as needed.
- Victims/Survivors and complainants can choose if/when they would like to take up the support options available to them.
- We are committed to learning from victims/survivors and complainants and being guided by them, where safe and appropriate to do so.
- We are committed to collaboratively working with local NGOs; women's rights groups; government ministries, agencies and departments; to develop learning on safe, intersectional, and feminist support options and ensuring that the support options offered meet the needs of diverse Victims/Survivors.
- We will ensure that cases are referred to appropriate professionals and organisations and that due diligence is taken to ensure that they act in line with our values and puts the welfare of all parties concerned as the highest priority.

### 4.4 Equality and Inclusion

Plan International recognises that imbalances in power and gender inequality are key drivers for SHEA. We recognize that in all societies in which we work, gender and social inequality exists. Staff, Associates, and programme participants may have learned to accept unequal norms and stereotypes and that the very nature of our work can unintentionally create and maintain differential power and unequal opportunities.

<sup>19</sup> Person making a complaint; it may be the person who experienced what is being reported, or it may be another person. Please see Appendix 1 for the full definition.

<sup>20</sup> A legal entity that has signed a Members' Agreement and License Agreement with PII. Please see Appendix 1 for the full definition.  
PII Policy Preventing Sexual Harassment, Exploitation and Abuse (PSHEA).

We take an intersectional approach to PSHEA and safeguarding. We consider the ways that multiple identities together create a person's experiences of power, gender and social inequality and therefore vulnerability to violence and SHEA. We take appropriate measures to address implicit and explicit biases including gender bias and other forms of discrimination and violence which may arise because of a person's diverse identity and/or position in society. We support the empowerment and inclusion of victim/survivors in the response process, in a manner that promotes equality, equity and ultimately their increased safety and protection.

#### **4.5 Shared Responsibility**

All staff, Associates and visitors must be aware of and adhere to this policy. Everybody has a responsibility to prevent SHEA and must take their safeguarding responsibilities seriously and uphold the principles of the policy. In turn, Plan International will work collaboratively with others to support and strengthen the capacity of partners, the sector and our global organisation to prevent and respond to SHEA.

#### **4.6 Open and Accountable**

Plan International is committed to openness and transparency and will hold ourselves to account for our commitment to preventing SHEA. Our leaders will set clear expectations and take personal and organisational responsibility to create safe and inclusive environments to ensure a culture of equity and inclusion. We will maintain our responsibility to provide information on this Policy to all programme participants, children and members of communities in which we work, staff, Associates and visitors. We will explain our commitments so that they understand how to exercise their rights and how to report any concerns related to SHEA. In order to remain accountable to all staff, Associates, Visitors and programme participants we will ensure safeguarding and SHEA concerns can be raised and discussed; poor practice and inappropriate behaviours can be challenged and addressed; and PSHEA and safeguarding measures will be regularly reviewed and strengthened.

We will maintain our responsibility for ensuring safeguarding and PSHEA is mainstreamed throughout the organisation. Our Safeguarding Implementation Standards cover PSHEA measures, align with the IASC Minimum Operating Standards for PSEA<sup>21</sup> and lay down the requirements for ensuring safeguarding (which includes PSHEA measures) are embedded in all parts of our operations and interventions. General guidelines for implementing PSHEA in Practice are provided in Annex 2.

## **5. ROLES AND RESPONSIBILITIES**

### **5.1 All staff, associates and visitors shall:**

- a. commit and contribute to an environment which prevents SHEA and where children, programme participants, Staff, Associates and Visitors feel respected, supported, safe and protected;
- b. never act or behave in a manner that results in sexual violence against a child, programme participant, Staff, Associate or Visitor or places them at risk of sexual violence;
- c. be aware of and adhere to the provisions of this Policy.
- d. confidentially report any concerns, rumours, suspicions or allegations of SHEA and/or breaches of this policy immediately (or at least within 24 hours) using the relevant and/or country specific procedures.

### **5.2 All staff shall:**

- a. comply with this Policy, including the PII PSHEA Code of Conduct (Annex 1);

### **5.3 Associates and visitors shall:**

- a. agree, by signing, to complying with either Plan International's PSHEA Code of Conduct (Annex 1) or other appropriate guidance developed by a manager<sup>22</sup> at the relevant Plan International Entity on appropriate PSHEA codes of behaviour as relevant to their engagement using the PSHEA Code of Conduct (Annex 1) as a guide; **or**
- b. comply with their own PSHEA Code of Conduct, provided the contracting manager ensures that it complies, and is consistent, with this Policy.

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<sup>21</sup> The Minimum Operating Standards Protection from Sexual Exploitation and Abuse by own Personnel is developed by IASC and provides standards for ensuring organisations have measures in place to prevent and address PSEA.

<sup>22</sup> A staff member who has responsibility for line managing or supervising the work of staff or associates. Please see Appendix 1 for full definition of Manager.

#### 5.4 Managers shall ensure that:

- a. children, programme participants and communities with whom we engage, work or are in contact with and staff, Associates and Visitors are made aware of the provisions of this Policy and have the confidence and ability to report any SHEA incidents or breaches of this policy;
- b. staff, associates, and visitors are aware of the Safeguarding Implementation Standards that are applicable to their role or engagement with us;
- c. they support and develop systems which maintain an environment which is safe for, and prevents sexual violence against, children, programme participants, Staff, Associates and Visitors;
- d. they are accountable for ensuring that this Policy is fully embedded within their areas of responsibility in accordance with the Safeguarding Implementation Standards, PII Codes of Conduct and Harassment Bullying and Discrimination tools.

#### 5.5 Directors<sup>23</sup> shall ensure that:

- a. the relevant Plan International Entity has in place local procedures that are consistent with this Policy and with the global Reporting and Responding guidelines which outlines the reporting requirements and the manner in which they are escalated within each Plan International Entity. These local procedures should be developed with the assistance of local advisers and updated regularly, in line with policy revision or sooner if needed. The policy and applicable procedures must be made available in local languages and reader and child-friendly formats;
- b. the relevant Plan International Entity implements our Safeguarding Implementation Standards, PII Codes of Conduct and Harassment Bullying and Discrimination tools as they apply to their context, the staff, associates, and visitors, and the children and programme participants with whom they engage, as well as the processes, programmes, projects, events and activities they undertake.

**5.6 Organisations that work with us** in carrying out our programmes, projects, processes, events and/or activities involving children and programme participants must comply with the Guidelines for Implementing PSHEA in practice contained in Annex 2 of this Policy.

**5.7 All Plan International Entities** shall monitor compliance with this Policy through the mandatory tracking and auditing of the Safeguarding Implementation Standards and the implementation of the PII Codes of Conduct and Harassment Bullying and Discrimination Policy. Auditing against the standards and workplace policies will be led by PII's Global Assurance Department. In addition, we will work with and ensure the participation of children, programme participants, staff, associates and visitors to review, monitor and evaluate the implementation of this Policy.

## 6. BREACHES OF THIS POLICY

- 6.1 Breaches of this policy will be investigated in accordance with appropriate procedures and contractual agreements. Referrals may be made to statutory authorities for criminal investigation under the law of the country in which breach happened.
- 6.2 Any allegation/suspicion of a breach made against a member of staff, Associate or visitor will be dealt with as quickly as possible, in a fair and consistent way that provides effective protection for the victim/survivor and at the same time supports the person who is the subject of the allegation.
- 6.3 Actions may be taken during an investigation stage that are intended to be precautionary and not a disciplinary sanction or an assumption of guilt.
- 6.4 Breaches may incur sanctions including disciplinary action leading to possible dismissal, termination of all relations including contractual and partnership agreements, and where relevant, appropriate legal or other such actions.
- 6.5 The rights, intersecting identities and vulnerabilities of the alleged perpetrator will also be considered during the course of an investigation to inform an assessment of potential false or malicious accusations against them.

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<sup>23</sup> An Executive Director of PII or a National Director.  
PII Policy Preventing Sexual Harassment, Exploitation and Abuse (PSHEA).



- 6.6 If a legitimate concern is raised but proves to be unfounded on investigation no action will be taken against the reporter. However, appropriate sanctions will be applied in cases of deliberately false and malicious accusations.

# APPENDIX 1: DEFINITIONS

## When used in this document:

**“Abuse”** includes all forms of physical or mental violence, injury or violence, neglect or negligent treatment, emotional ill-treatment or psychological violence, sexual abuse and exploitation, harassment, and commercial or other exploitation. Acts of abuse can also take place online through, for example, the web, social media or mobile phones. It may be an intentional act involving the use of physical force or power or it may be failing to act to prevent abuse. Abuse consists of anything which individuals, groups, institutions or organisations do or fail to do, intentionally or unintentionally, which either results in or has a high likelihood of resulting in actual or potential harm to another’s wellbeing, dignity and survival and development.

**“Associate”** refers to a range of contracted paid and non-paid individuals who have committed to work with or support a Plan International Entity. It includes, among others, board members, volunteers (including community volunteers), interns, sponsors, researchers, donors, consultants and contractors, staff and/or representatives of partner organisations and local governments (when operating in partnership agreement with a Plan International Entity).

**“Child”** in line with the United Nations Convention on the Rights of the Child and for the purposes of this Global policy, is defined as any person – girl, boy, young woman, young man, and children of other gender identities - under the age of 18 years (UNCRC Article 1). (See definition of young person/people or youth below).

**“Child Abuse”** all forms of physical and/or emotional ill-treatment, Sexual Abuse, neglect or negligent treatment or commercial or other Exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

**“Child sexual abuse material”** is defined as any representation, by whatever means of a child used for real or simulated sexual activities or any representation of the sexual parts of a child for sexual purposes. It also includes engaging in the production of, viewing, downloading and/or distribution of any such material (whether via the internet or not) and includes pseudo photographs, comics, drawings, and cartoons.

**“Complainant”** This is the person making a complaint; it may be the person who experienced what is being reported (the victim/survivor), or it may be another person (a third-party complainant) who becomes aware of an issue and makes the complaint.

**“Director”** is an Executive Director of PII or a National Director.

**“Gender Responsive Intersectional Safeguarding”**<sup>24</sup> is a safeguarding approach that:

- Takes full account of the individual’s gender and overlapping identities and experiences in order to understand the complexity of the prejudice and/or inequality they face, or conversely how this may lead to a heightened privileged status; and the consideration of this in their specific safeguarding needs
- Integrates safeguarding measures that addresses protection risks for individuals, with whom we work that stem from issues relating to gender and other identity bias and discrimination and creates safe spaces where it is safe to challenge and address inequality, power and bias.
- Requires us to reflect on our status as a prominent INGO and acknowledge the power imbalance this causes within the organisation (where within the organisation power lies, who typically are the “dominant”<sup>25</sup> and “non-dominant”<sup>26</sup> groups and how this impacts on decisions we take on safeguarding), as well as between the organisation and the wider society
- Develops our capacity to analyse how individuals can be at risk of harm and abuse as a result of our work because of their particular identity (age, gender, sexual orientation, tribe, race, colour, disability etc.);

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<sup>24</sup> A working definition developed by PII Child and Youth Safeguarding Unit

<sup>25</sup> Those with the most power, greatest privileges and access to and control over resources

<sup>26</sup> Those with less power and authority, limited access to or control over resources

- Supports the empowerment and fosters the inclusion of individuals in all their diversity, particularly in the safeguarding process, in a manner that promotes equality, equity and ultimately their increased safety and protection

**“Harm”** is any detrimental effect on a person’s (child’s or adult’s) physical, psychological, or emotional wellbeing. Harm may be caused by Abuse or Exploitation whether intended or unintended.

**“Intersectional”** Intersectionality is a theoretical framework for understanding how aspects of a person's social and political identities (e.g., gender, sex, race, class, sexuality, religion, disability, physical appearance, being a programme participant etc.) intersect, overlap and compound to create interdependent forms of discrimination and privilege (or advantage/disadvantage). Intersectionality identifies advantages and disadvantages that are felt by people due to a combination of factors.

**“Investigation”** a process designed to gather information in order to determine whether wrongdoing occurred and, if so, the person(s) responsible.

**“Manager”** refers to a staff member who has responsibility for line managing or supervising the work of staff or associates.

**“National Organisation”** or **“NO”** refers to a legal entity that has signed a Members’ Agreement and License Agreement with PII.

**“Online Child Abuse”** Online Child Sexual Abuse and online Child Sexual Exploitation involves the use of information and communication technology as a means to sexually abuse and/or sexually exploit children.

Online Child Abuse includes:

- Sexual Abuse material or images
- use of children for sexual performance online or in imagery
- any sexualised conversation with a child
- online grooming coercion or using threats
- sharing inappropriate content with a child

**“Online Sexual Exploitation and Abuse”** is when one person manipulates another person to get them to do something sexual — it’s an ongoing cycle of emotional and psychological Abuse. This can include things such as forcing or blackmailing someone into sending sexual photos/videos of themselves online or to perform sexual acts over webcam. Online Sexual Exploitation and Abuse can occur whether communication is between an adult and a child or between two adults.

**“PII”** refers to Plan International, Inc., including when operating through one of its subsidiaries. It generally includes Global Hub, regional hubs, liaison offices, and country offices.

**“PSHEA”** stands for Preventing Sexual Harassment, Exploitation and Abuse. It refers to the responsibilities; preventative, responsive and referral measures that we undertake to prevent children and programme participants from being subject to sexual harassment, sexual exploitation and sexual abuse.

### **“Programme Participant”**

**Direct Programme Participants** are the people who are the target of and who we know will be immediately affected by one or more programme/project outputs; irrespective of whether these are delivered directly by Plan International or by partners or organisations who are acting on behalf of Plan International.

- Direct programme participants are individuals who receive materials, equipment; interventions such as training, awareness raising, mentoring or other personal support.
- Direct programme participants may be a single member of a household (for example a mother participating in training on nutrition); or it may be all members in the household (for example, parents enrolled in nutrition programmes/projects for improved family nutrition and health).
- Direct programme participants include sponsor children and their family; advocates and participants in advocacy events or awareness raising; participants in Plan supported projects and programmes; members of Youth Advisory Panels. This not an exhaustive list.

**Indirect Programme Participants** are the people who are not the direct target of the project, but who we have good reason to expect will derive secondary benefits from the project outputs. These include individuals who:

- Benefit from the increased resources or capacities of a direct programme participant of the project. (For example: The children of the parents who received training in hygiene or parenting; or the family members who also benefit from the increased household income through the person who participated in savings groups.)

- Benefit from interventions that are aimed at improving the conditions for a community as a whole rather than the individual persons or households. (For example: The people who live in the catchment area of the health clinic, school or community water services that has been improved by the project).

Programme participants can be of any age and include young people who we engage with through our programming and influencing interventions.

Where a Programme Participant has a second identity with Plan, e.g. as intern, incentive worker, volunteer or other; their Programme Participant identity will be the dominant identity considered when handling any Safeguarding and PSHEA cases or concerns.

**NB:** The wider public who might be reached through awareness raising in public media or who might eventually benefit from changes in legislation or policy are not considered part of either direct or indirect programme participants. If counts for specific advocacy projects are required, this should be done by a different, more appropriate method.

**“Safeguarding”** is the responsibilities, preventative, responsive and referral measures that we undertake to protect children and programme participants, ensuring that no child or programme participant is subject to any form of harm as a result of their association with the organisation. This includes, ensuring that their contact with us and those Associated with us and/or their participation in our activities interventions and operations is safe and where there are concerns over a child or programme participant’s welfare or where a child or programme participant has been subject to violence, appropriate and timely actions are taken to address this and incidents are analysed so as to ensure continued learning for Plan International Entities.

**“Sexual Abuse/Violence”** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual offences including but not limited to: attempted rape (which includes attempts to force someone to perform oral sex); and sexual assault (which includes non-consensual kissing and touching). All sexual activity with someone under the age of consent<sup>27</sup> is considered to be Sexual Abuse. This definition applies to both adults and children.

All sexual activity with someone under the age of consent is considered to be sexual abuse and illegal locally. In addition, for Plan International, and in line with the UN Secretary-General’s Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse (ST/ SGB/ 2003/13) “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 in the age of a child is not a defence.”

**“Sexual Exploitation”** Any actual or attempted Abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from Sexual Exploitation of another.

**“Sexual Harassment”** A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favours or engages in other unwelcome conduct of a sexual nature, or indecently exposes themselves, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated. Sexual Harassment can take various forms. It can be obvious or indirect, physical or verbal, repeated or one-off and perpetrated by any person of any gender towards any person of any gender. Sexual Harassment can be perpetrated against programme participants, community members, citizens, as well as staff and personnel.

Sexual harassment may include, without limitation:

- Gestures;
- Unwanted physical conduct, including touching, pinching, pushing and grabbing;
- Persistent following or stalking;
- Insinuations about a person’s private life;
- Inappropriate or offensive comments about physical appearance;
- The display of offensive material, sexist comments or comments of a sexual nature;
- Outing someone’s sexual orientation or gender identity;
- Asking sexual questions, such as questions about someone’s sexual history or their sexual orientation;
- Implicit or explicit demands for sexual activity or subtle pressure for sexual favours;
- Making repeated comments about someone’s physical appearance;

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<sup>27</sup> Refers to age of consent requirements specified for sexual activity in the law of the host country or the age of consent under UK legislation, whichever sets the greatest age.

- Gender, gender identity or sexual orientation related insults; or
- Pranks which are lewd in nature, making lewd jokes or sharing sexual anecdotes.

This list is not exhaustive.

**“Sexual Violence Against a Child”** the Sexual Abuse and Exploitation of a child including:

- a) The inducement or coercion of a child to engage in any unlawful or psychologically harmful sexual activity;
- b) The use of children in commercial sexual Exploitation;
- c) The use of children in audio or visual images of child sexual abuse or for sexual performances
- d) Exploitation for/in prostitution, sexual slavery, Sexual Exploitation in travel and tourism, trafficking (within and between countries) and sale of children for sexual purposes and forced marriage. Many children experience sexual victimization which is not accompanied by physical force or restraint but which is nonetheless psychologically intrusive, exploitive and traumatic.

**“SHEA”** stands for sexual harassment, sexual exploitation and sexual abuse.

**“Staff”** refers to individuals who receive a regular salary for work in any Plan International Entity as well as individuals paid by or through a Plan International Entity but located in another entity.

**“Stakeholder”** is any person, organization, social group, or society at large that has a stake in our work, this can include our programme participant’s communities, governments and donors

**“Trafficking”** a process of enslaving people, coercing them into a situation with no way out, and exploiting them. People can be trafficked for many different forms of Exploitation such as forced transactional sex, forced labour, forced begging, forced criminality, domestic servitude, and forced marriage, and forced organ removal.

**“Victim/Survivor”** a person who has experienced Sexual Abuse, Exploitation, or harassment. The terms ‘victim’ and ‘survivor’ can be used interchangeably. ‘Victim’ is a term often used in the legal and medical sectors. ‘Survivor’ is the term generally preferred in the psychological and social support sectors because it implies resiliency. We use both terms as part of our survivor-centred approach and allow those affected by Sexual Abuse and Exploitation to choose the term they prefer. A victim/survivor could be a programme participant or a staff member, Associate or visitor.

**“Violence”** against a child, young person or adult includes all forms of physical or mental violence, injury or Abuse, neglect or negligent treatment, emotional ill-treatment or psychological violence, Sexual Abuse and Exploitation, harassment, and commercial or other Exploitation. Acts of violence can also take place online through, for example, the web, social media or mobile phones. It may be an intentional act involving the use of physical force or power or it may be failing to act to prevent violence against a person. Violence consists of anything that individuals, groups, institutions or organisations do or fail to do, intentionally or unintentionally, which either results in or has a high likelihood of resulting in actual or potential harm to the child or young person or adult’s wellbeing, dignity and survival and development.

**“Visitor”** refers to a range of persons who are visiting our offices or programmes and may come into contact with children and programme participants through a Plan International Entity, including journalists, media, researchers, visiting sponsors or celebrities.

**“Vulnerability”** refers to a person’s ability, which is limited by their social and political identities, to avoid, resist, cope with or recover from violence, exploitation, and abuse. Vulnerable is the greater risk of violence, exploitation, and abuse due to their intersecting identities, for example, due to their gender, sexual orientation, ethnic origin, disability, age or illness.

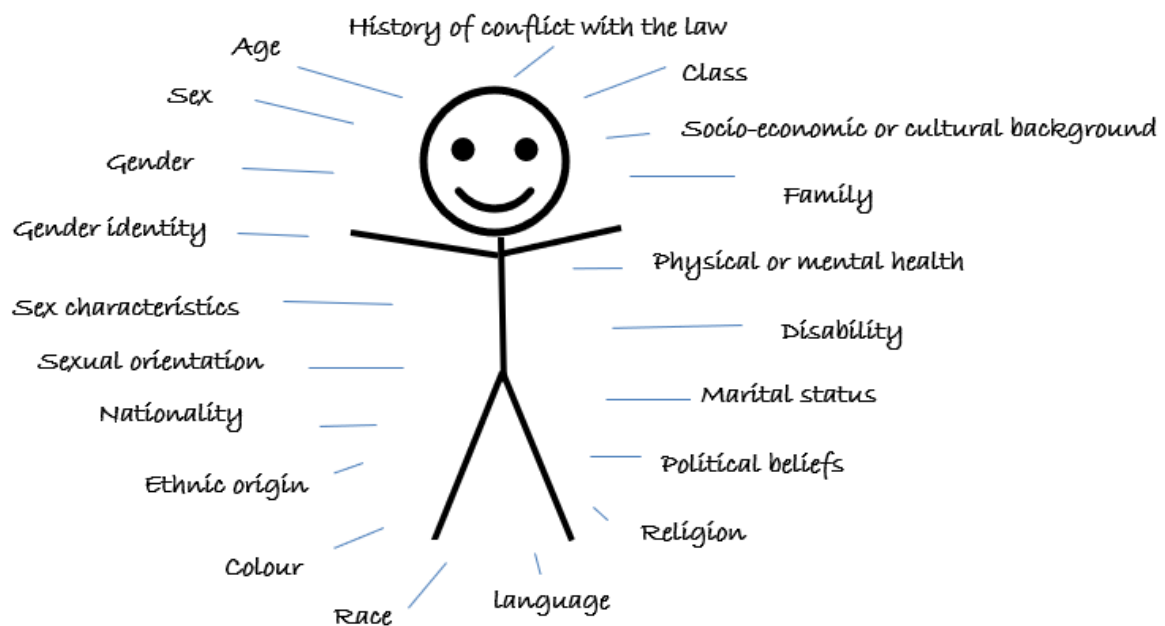
**“Workplace Safeguarding”** refers to the responsibilities, preventative, responsive and referral measures that we undertake to protect our staff, Associates and Visitors from harm as a result of their work or association with the organisation.

**“Young Person/People”** or **“Youth”** in line with United Nations definitions, include individuals – young women, young men, and young persons of other gender identities - aged 15 years to 24 years old. This group spans the categories of ‘children’, ‘adolescents’ and ‘adults’ but regards Young People as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.

# APPENDIX 2: INTERSECTIONALITY

Intersectionality is a way of thinking about power, privilege, and gender that recognises a person's combination of social identities. Social identity is the part of each of us which identifies as a member of a social group. These social groups which impact on our identity may include age, sex, gender, gender identity, sex characteristics, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, any history of conflict with the law, and more.

Intersectionality means we think about multiple forms of inequality (based on our social identities) at the same time rather than considering each of them separately and we understand how they overlap (or intersect) and compound to create a person's experience of prejudice and inequality, or power and privilege.



Instead of thinking a girl or woman's oppression based on sexism alone, or a Black person's oppression based on racism alone, or a disabled person's oppression based on ableism alone, intersectionality looks at how those identities intersect. For example, intersectionality would seek to understand how a disabled, Asian girl is affected by the overlapping and compounding prejudices and inequalities of sexism, racism, and ableism all at once rather than separately. This girl is cisgender<sup>28</sup>, Asian, a person of colour and has a disability and may endure specific forms of prejudice and inequality that Asian boys might not, or Asian girls without a disability might not, or a white girl with a disability might not etc.

Social inequality is the existence of unequal opportunities and rewards for different social positions or statuses within a group or society.

<sup>28</sup> Cisgender describes someone whose gender identity corresponds to their sex assigned at birth.  
PII Policy Preventing Sexual Harassment, Exploitation and Abuse (PSHEA).

# APPENDIX 3: SHEA REPORT CHAIN AND THE REMIT FOR CASE MANAGEMENT RESPONSE AND SUPPORT

## SHEA Incident

Report is made to:

Safeguarding/PSHEA Focal Point, People and Culture Manager/Director,  
Senior Management of Director

in line with Camms reporting process

Where the Alleged Victim/Survivor is:

- **A child** (*anyone under 18 years and irrespective of their association with Plan*)
- **A Programme Participant** (*irrespective of age*)

This will be dealt with in accordance with Plan's Global Safeguarding and PSHEA Policies. Support to the Country will come **under the remit of/guidance from the Global Safeguarding and PSHEA Unit.**

- **A community volunteer supporting programme delivery in the community.**
- **A community member** (*i.e. an individual living within a community where Plan delivers its programmes*)
- **A national/local/ community partner staff** (*this would include Community Based Organizations, Local and National NGOs and Organisations, Civil Society Organisations, Youth Movements we partner with for example.*)
- **A community member, or someone associated with Plan or partner.**

This will be dealt with in accordance with Plan's PII PSHEA Policy. Support to the Country will come **under the remit of/guidance from the Global Safeguarding and PSHEA Unit.**

- **Plan staff.**
- **A Plan associate working within Plan's workplace** *e.g. volunteer in the workplace, consultant, board member.*
- **A staff of a peer agency with whom Plan is partnering.** (*e.g. INGOs with whom we are partnering), a staff of a global bilateral institution (e.g. World Bank, UNICEF) or a staff of a corporate organisation.*

This will be dealt with in accordance with Plan's PII Harassment, Bullying and Disciplinary Policy' and PII PSHEA Policy, Support to the Country will come **under the remit of/guidance of the Regional and/or Global People and Culture Department**

# ANNEX 1: PSHEA CODE OF CONDUCT

Plan International is committed to creating an environment which prevents and addresses sexual violence for children, programme participants, Staff, Associates and Visitors committed by Staff, Associates and Visitors engaged by Plan. All staff have a duty to uphold the principles of this Policy and commit to maintaining an environment that prevents sexual violence, both at work and outside of work. Sexual harassment, exploitation and abuse by staff (including those that work in our humanitarian response) constitutes acts of gross misconduct and therefore may be grounds for termination of employment. **(IASC 6 Core Principles relating to Sexual Exploitation and Abuse – Core Principle number 1)**

## PII PSHEA Codes of Conduct

In the spirit of protecting children, programme participants, those we serve, Staff, Associates and Visitors from all forms of Sexual Harassment, Abuse and Exploitation, you are required to commit to the following codes of conduct which are already detailed in our Global Safeguarding Policy, PII Code of Conduct Policy and Harassment, Bullying and Discrimination Policy. This Annex extracts from these documents those codes specifically related to the Prevention of Sexual Harassment, Exploitation and Abuse. **Important:** Please refer to the Safeguarding Policy, PII Code of Conduct Policy and Harassment, Bullying and Discrimination Policy for the full list of codes of behavior you are expected to adhere to.

### I agree that I will

- a) Treat all persons fairly and with dignity and respect.
- b) Behave at all times in accordance with Plan's Values and Behaviours
- c) Create, contribute and maintain an environment free from sexual harassment, exploitation and abuse. **(IASC 6 Core Principles relating to Sexual Exploitation and Abuse – Core Principle number 6)**
- d) Be aware of the issue of sexual harassment, exploitation and abuse, the forms it can take and of the damage it can do to individuals and to Plan International Inc.;
- e) Demonstrate compliance to, and support of this Code of Conduct, and any prevailing policies from which these codes are taken - Global Safeguarding Policy, PII Code of Conduct Policy and Harassment, Bullying and Discrimination Policy
- f) Declare any intimate or sexual relationship that I engage in with Plan International staff, Associates or Visitors, recognising that there may be an inherent conflict of interest and potential abuse of power. I will not directly manage a person with whom I have a personal (intimate) relationship with.
- g) Act quickly and immediately to report any matter or suspected acts which appears to break the PSHEA Policy and Codes of Conduct or associated Policies that I witness, or I am made aware of to the appropriate management, using the relevant and/or country specific procedures. **(IASC 6 Core Principles relating to Sexual Exploitation and Abuse – Core Principle number 2)**
- h) Cooperate fully and confidentially with any investigation relating to potential breaches of Plan International Policies, including these PSHEA codes of conduct.
- i) Immediately disclose all charges, convictions, and other outcomes of an offence, which occurred before or occurs during association with Plan International that relate to sexual harassment, exploitation and abuse
- j) Commit to abide by this PSHEA Code of Conduct at all times.

## Specifically in relation to children and programme participants

### I agree that I will

- a) Adhere to the PSHEA Policy and be open and honest in my dealings with children, programme participants, their families, and communities participating in programmes, projects, processes, events, and activities.
- b) Treat children and programme participants in a manner which is respectful of their rights, integrity, and dignity and considers their best interests regardless of age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, or any history of conflict with the law.
- c) Create and maintain an environment which prevents violence, abuse and exploitation of children and programme participants ensuring that I am aware of potential risks with regards to my conduct and work and take appropriate action so as to minimise risks to children and programme participants.

**I agree that I will not:**

- k) Abuse, exploit or harass a child, programme participant or member of the wider community in which we work or behave in any way that places them at risk of harm, including through harmful traditional practices such as, for example, Female Genital Mutilation, forced or child marriage.
- l) Exploit the vulnerability of the communities we work in, children and programme participants we work with or allow them to be put into compromising situations
- m) Fondle, hold, kiss, hug or touch children or programme participants in an inappropriate way or a manner that is contrary to cultural or social safeguarding norms.
- n) Engage in any form of sexual activity or develop physical/sexual relationships with anyone under the age of 18 regardless of the age of consent locally. Mistaken belief in the age of a child is not a defence. **(IASC 6 Core Principles relating to Sexual Exploitation and Abuse – Core Principle number 2)**
- o) Engage in sexual relationships with Plan International programme participants, regardless of their age, as these undermine the credibility and integrity of Plan International's work and are based on inherently unequal power dynamics. **(IASC 6 Core Principles relating to Sexual Exploitation and Abuse – Core Principle number 4)**
- p) Engage programme participants, or anyone in the wider community, in any form of sexual activity that involves the exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes exchange of assistance that is due to programme participants. **(IASC 6 Core Principles relating to Sexual Exploitation and Abuse – Core Principle number 3)**
- q) Use language or behave towards a child or programme participant in a way that is inappropriate, offensive, abusive, sexually provocative, demeaning or culturally inappropriate.
- r) Develop relationships with, engage in any practice with or develop behaviour towards children, programme participants or the wider community in which we work, which could in any way be deemed or interpreted as exploitive or abusive.
- s) Condone or participate in behaviour of children or programme participants, which is illegal, unsafe, or abusive.
- t) Use any computers, mobile phones, video and digital cameras, or any such medium to exploit, harass or bully children or programme participants.
- u) Access, view, create, download, or distribute child sexual abuse material<sup>1</sup> (commonly referred to as 'child pornography') via computers, mobile phones, or video/digital cameras, other electronic devices or any other media, be it personal property or property owned by Plan International.
- v) Have a programme participant or child/children with whom I am in contact in a work-related context, stay overnight at my home or any other personal residential location or accommodation.
- w) Sleep in the same room or bed as a programme participant or a child with whom I am in contact in a work-related context. Where it is necessary to sleep close to unaccompanied children and programme participants, I will make sure that another adult is present and it is in line with authorised procedures.
- x) Do things of a personal nature for a programme participant or child with whom I am in contact in a work-related context, (e.g. taking a child to the toilet/bathroom; helping them get un/dressed etc.) that they can do for themselves.
- y) Spend time alone away from others with programme participants or children with whom I am in contact in a work-related context; I will always make sure that another adult is with me and/or I am with the child/young person in an open public place, where others are around and in plain view of others.

We do not dictate the belief and value systems by which staff, associates, and visitors conduct their personal lives. However, actions taken out of working hours that are seen to contradict this policy or bring the organisation into disrepute in regard to our PSHEA standards may be considered a violation of the policy. Our staff, managers, associates, and visitors are required to adhere to principles of the PSHEA both at work and outside work.



# ANNEX 2: GUIDELINES FOR IMPLEMENTING PSHEA IN PRACTICE

These guidelines outline the requirements for preventing and addressing sexual harassment, exploitation and abuse of staff, associates, children and programme participants that are applicable to organisations that work with Plan International Entities in carrying out our programmes/projects.

They are particularly applicable to organisations assessed as having contact with children and programme participants, working with children and programme participants, and/or whose projects, programmes, processes, activities, advocacy and influence work impact on children and programme participants. Organisations funded by a Plan International Entity are expected to build on these guidelines as appropriate based on the nature of their activities and risks to children and programme participants.

The guidelines illustrate our commitment to support and respect rights to be protected from harm, and to provide a safe and protective environment for staff and associates to work with Plan International and Plan International Entities and children and programme participants who are involved with any programmes/projects funded by a Plan International Entity.

- 1. Prevention:** The Organisation must take appropriate measures to identify and manage any risk of Sexual Harassment, Exploitation and Abuse and prevent SHEA before it occurs. Prevention measures should include organisational safeguarding and PSHEA policies, codes of conduct and associated procedures; the management of risks in relation to its operations, activities and interventions; and the production and promotion of safeguarding and PSHEA information and resources which are accessible and readily understood by staff, associates, children and programme participants.
- 2. Code of Conduct:** Each Organisation is required to ensure that their personnel avoid any behaviour or conduct that is, or could be deemed as, sexual harassment, exploitation or abuse. The Organisation should make clear, in policy and practice documents, what constitutes sexual harassment, exploitation and abuse and that breaches of the code of conduct in this regard will be subject to disciplinary measures, including dismissal.
- 3. Gender Equality and Non-Discrimination:** The Organisation should ensure that all Safeguarding and PSHEA policies and procedures take into account gender equality and non-discrimination requirements; adopting an intersectional approach. Recognising that staff, associates, children and programme participants, as well as other members of the community of different gender identities may face different risks relating to SHEA and that all have an equal right to protection, irrespective of: age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, or class.
- 4. Screening Procedures:** There should be detailed screening procedures for all personnel (including unpaid volunteers). Screening procedures should be available in each country and updated on a regular basis, where possible. Screening procedures may include certificate of good conduct, police reference checks or equivalent, verification that applicants are not listed in national registries e.g. of sex or child offenders; a detailed application and interview process; references who support the applicant's suitability to work in aid and development organisations and particularly with children and/or programme participants.
- 5. Awareness:** The Organisation should ensure that all personnel, sub-contractors or consultants or affiliates are aware of safeguarding and PSHEA risks, policies and procedures; and their safeguarding and PSHEA responsibilities. In addition children and/or programme participants engaged and their parents, guardians or carers should be informed of the same so that they know what behaviours to expect and how to report any concerns.
- 6. Capacity Sharing:** The Organisation should develop the capacity of all staff and associates to appropriately prevent, detect, report and respond to safeguarding and PSHEA concerns and particularly as they pertain to differing gender and other identities. Efforts should be made to ensure organisational policies and practices are understood and can be effectively implemented through mandatory inductions and on-going training courses for all staff and volunteers and other associates.
- 7. Participation of children and/or programme participants:** Children and/or programme participants should be actively, meaningfully and ethically involved in the development of safeguarding and PSHEA

measures in accordance with their evolving capacities. Children and/or programme participants must not be treated simply as objects of concern but rather listened to and taken seriously and treated as individual people with their own views.

8. **Reporting mechanisms for children and/or programme participants and staff:** Mechanisms should be established that enable the safe reporting of safeguarding and SHEA concerns. Such mechanisms should ensure appropriate escalation of concerns within the organisation, referral to the appropriate authorities and confidentiality. In addition, child and programme participants reporting mechanisms should be accessible, friendly and sensitive to their differing needs. It is important that complaints mechanisms are established with the participation and input of different groups of children and programme participants, as well as communities, so they work for all users as necessary.
9. **Response and Follow Up:** Organisational policies and procedures should include appropriate measures to support and protect staff, associates, children and/or programme participants when concerns arise. All measures taken to respond to a safeguarding and SHEA concern should take into account the wishes of the survivor and, with regard to children, their best interests. The response should be sensitive to survivors differing gender and other identities ensuring they are kept safe and protected. Response measures should be appropriately risk assessed and endeavour to ensure no further harm comes to the survivor as a result of any actions taken by the Organisation.
  - Concerns should be written up and information kept in accordance with the privacy and confidentiality policies of the Organisation and/or local legislation. In addition, organisational processes should ensure response evaluation and follow up for organisational learning.
  - The Organisation should also advise Plan International of any reports of SHEA in line with the working agreement.
10. **Implementation, Monitoring and Review:** The implementation and monitoring of the safeguarding and/or PSHEA policy(ies) for each Organisation should be reviewed at regular intervals as determined necessary by the Organisation, preferably at least every three (3) years, where possible.
11. **Sanction and Discipline of Organisation personnel:** The Organisation policies and procedures should provide for appropriate sanctions and disciplinary measures in the event of SHEA. This may include the immediate suspension of personnel until such time as the allegations are followed up and either substantiated or refuted and/or where personnel is found to have perpetrated SHEA, the said personnel is immediately terminated with cause from his or her position.
12. **Working with partners:** The Organisation should ensure adequate safeguarding and PSHEA assessments are made as part of its due diligence processes when it comes to partnership working. Third party entities that are contracted, or those supported to work with children and programme participants, must be subject to the same safeguarding and PSHEA principles and approach outlined in the Organisations policy and procedures. Vendors, suppliers and other contractors must also be subject to appropriate safeguarding and PSHEA measures.