

Rural Education and Environment Development Center (REED-Nepal)



PREVENTION OF SEXUAL EXPLOITATION AND ABUSE POLICY (PSEA)

Policy Owner:	Chief Executive Officer
Approved by:	Executive Committee of REED Nepal
Issued Date:	1 st August, 2019
Reviewed Date:	1 st October 2021
Next Review Date:	1 st September 2023

1. Introduction

Rural Education and Environment Development Center (REED-Nepal) is committed on protection from sexual exploitation and abuse to specifically incorporate the broader concerns on child abuse as the major focus of the organization is connected with its mission on **“ensuring that every children growing in poverty receive education to achieve positive changes in their lives”**. To ensure its commitment, REED recognizes that unequal power dynamics exist in our society at all levels and that there is an inherent risk of some staff exploiting their position of influence and perceived authority.

In order to protect the most vulnerable populations, particularly vulnerable children, and to ensure the integrity of REED Nepal through its different activities implemented at field level, this PSEA becomes an integral part of REED Nepal to be strictly abide by all the employees and related personnel and uphold and promote the highest standards of ethical and professional conduct.

REED does not tolerate its employees and related personnel (volunteers, consultants, vendors, partners, board and committee members or any other representatives associated with the delivery of its work) carrying out any form of sexual harassment, sexual abuse or sexual exploitation. Sexual harassment, violence, exploitation and abuse, as well as a range of non-sexual abuses of

power, take various forms and can happen to anybody at any time during their lives.

REED is committed to ending and works towards ending discrimination among men and women through its different interventions. REED recognizes that women are overwhelmingly the victims of sexual violence and sexual exploitation and abuse is a form of gender-based violence as it is more likely to be experienced by women and girls. REED is committed to working towards gender equality both inside the organization and with the communities it works with. REED has complementary policies that further strengthen and underpin this policy. They include:

- REED Child Safeguarding Policy
- REED Gender Equality Policy
- REED Complaints Handling Policy
- REED Code of Conduct
- REED HR and Admin Policy
- REED Computer and Internet Policy
- REED Volunteers Policy
- REED Communication policy

2. PURPOSE

The purposes of the Prevention of Sexual Exploitation and Abuse Policy is to:

- i. Set out the principles upon which REED will base its decision-making and actions;
- ii. Ensure standards of appropriate behavior of all who represent at REED;
- iii. Create and maintain organizational standards for REED to prevent, mitigate and respond to risks of sexual exploitation, abuse and harassment;
- iv. Clarify requirements for employees and other stakeholders.
- v. Engage the support of communities and governments to prevent and respond to risks of sexual exploitation, abuse and harassment by REED Employees and Related Personnel
- vi. Ensure that complaint mechanisms for reporting sexual exploitation, abuse and harassment are accessible and that REED focal points for receiving complaints understand how to discharge their duties.

3. SCOPE

The policy applies to all REED personnel engaged in REED's work, as well as other related personnel. Related Personnel includes all employees, volunteers, consultants, vendors, members of the Board and Committees. It also applies to individuals or groups engaged on a short-term basis by REED. This includes but is not limited to photographers, professionals providing training or other support, visiting donors and supporters and media personnel. All personnel must ensure the application of this policy and to promote it as relevant in all aspects of their work as well as to hold themselves and others responsible for creating a safe environment for all.

The REED PSEA policy applies within REED and wherever REED delivers services

or support in collaboration with stakeholders. Stakeholders are required to demonstrate commitment to zero tolerance of sexual exploitation, abuse and harassment. REED takes a risk based proportional approach to the application of standards and other requirements. REED requires staff and related personnel to meet the standards defined in the commitment section as below. All personnel, representatives and partners associated with REED have an obligation to promptly raise any concerns they have and to do so in accordance with the process described in this policy. It is not the role of individuals to decide whether or not sexual harassment, abuse or exploitation has occurred.

4. PRINCIPLES AND EXPECTATIONS

4.1 REED's Commitment to Prevention of Sexual Exploitation and Abuse

REED will not tolerate its personnel or partners' personnel carrying out any form of sexual violence, exploitation or abuse. Instances of actual, threatened or perceived incidents of sexual violence are counter to the work and the context of REED work and will be dealt with as high priority if and when reported.

Anyone found to have engaged in Sexual Exploitation or Abuse (SEA) will be dismissed immediately and will not be hired again by REED. When SEA involves the perpetration of a crime(s), the legal procedure of the Government of Nepal will be followed through informing and handing over the case to police, should the survivor choose to prosecute

REED is committed to:

- i. **Zero Tolerance Approach:** REED adopts a zero-tolerance approach to all forms of sexual exploitation and abuse. The zero tolerance of sexual exploitation and abuse in the organization is ensured through robust prevention and response work, offering support to survivors and victims and holding those responsible to account;
- ii. **Creating a safe working culture:** For all those whom REED serves and those working for and representing the organization, REED assures to create a safe working culture;
- iii. **Timely Response:** REED ensures that all concerns or allegations of sexual harassment, abuse or exploitation are responded to in a timely and appropriate manner affording procedural fairness to all individuals concerned;
- iv. **Confidentiality:** REED adopts a survivor-centric approach that respects the decision- making rights and confidentiality of survivors;
- v. **Non-Judgmental Approach:** REED will act in a non-judgmental manner without pre-judging abuse survivors or complainants claims, actions or decisions but assessing their claims and supporting evidence thoroughly and transparently in accordance with this policy;
- vi. **Information:** REED will maintain confidentiality by not sharing information outside the team or the organization unless it is believed that someone is in danger or a child has been or may be harmed. In instances where harm is not imminent but where there is considered to be value in sharing information with others, the permission of the complainant will be secured before proceeding to

share the information to other parties;

- vii. **Fair Investigation:** Performing an independent and discrete investigation through REED management team ensuring that those undertaking the investigation have no personal or direct working relationship with the complainant or the abused, and recognizing the rights and duty of care to everyone involved, including the complainant or survivor, witnesses and the person accused;
- viii. **Empowered Staff:** REED is building a culture where all those whom REED serves and who work for REED feel empowered to insist on non-discriminatory and respectful behavior from each other, where poor behavior is not accepted, and where power is not abused;
- ix. **Transparency:** REED is transparent about safeguarding issues occurring within REED, sensitive in the communications about the organization's practices and open to learning and improving.

4.2 Expectations

Recognizing the risk that some individuals may exploit their position of power for personal gain, REED expects all personnel to conduct themselves in accordance with the following policies relating to their sexual and personal conduct.

4.2.1 Sexual Activity with Children

REED strictly prohibits staff and other persons of REED from having sexual relationships with children, which is defined as anyone under the age of 18 years. Mistaken belief of age is no defence. Employees and other representatives must make every reasonable effort to alert all applicants of this policy position before employment of personnel who are married to children.

4.2.2 Sexual Activity with REED project participant

REED strictly prohibits employees, volunteers and other representatives of the organization from engaging in any form of sexual activity with REED's project participants.

4.2.3 Sexual activity between staff from REED and donors representatives

REED is clear that any partnerships we go into with others are based on mutual respect for values and beliefs. REED strictly prohibits personnel from engaging in sexual activity with employees from its stakeholders where this is an abuse of power. All employees and other representatives engaged in relationships with employees from stakeholders of REED must:

- Declare their relationships as soon as possible to their line managers or HR even if the relationship is at an early stage and may not continue. As long as relationships are conducted appropriately such disclosures will be treated confidentially.
- Behave professionally and conduct their relationships in a way that does not impact on REED's work.
- Ensure they do not make work decisions based on that relationship.

- Ensure that their relationships do not lead to abusive, fraudulent or corrupt behaviors.

4.2.4 Purchasing sex

REED's code of conduct strictly prohibits staff, volunteers and other representatives, as well as stakeholders, from engaging in transactional sex in field work. REED does not make a judgment against individuals who participate in selling sex in exchange for money or something else such as gifts or material support ("transactional sex"). However, in line with the IASC Core Principles on PSEA, REED does not condone this activity (in order to prevent sexual exploitation and abuse from occurring). A specific clause will be included in REED employment agreement.

4.2.5 Sexual Activity with other REED Colleagues

REED policy does not prohibit employees from beginning relationships with each other but encourages all employees and other representatives engaged in or beginning relationships with other employees or representatives to:

- Declare their relationships as soon as reasonable to their respective manager or CEO, even if the relationship is at an early stage and may not continue. As long as relationships are conducted appropriately such disclosures will be treated confidentially;
- Behave professionally and conduct their relationships in a way that does not impact on REED's work or stakeholders;
- Ensure they do not make work decisions based on that relationship and declare any conflict of interest. This may include employees who share responsibility for sign off on the same budget lines; or are involved in carrying out joint decision-making relating to resourcing or program issues; or are carrying out or acting as decision makers for internal investigative processes;
- Seek guidance from their line manager if there is any uncertainty in relation to issues stated in the paragraph above.
- Ensure that their relationships do not lead to fraudulent or corrupt behaviors. For example, if staff members choose to conduct travel at the same time as each other without having a valid work need for such travel, they will be committing fraud. The IASC Core Principles on PSEA state that it is the duty and the responsibility of all managers, employees and representatives to report in line with this policy any suspicions or incidences of inappropriate behavior. All REED employees are obliged to report any suspicions or incidences of inappropriate behavior towards others. This can be done without sharing details of cases where information has been shared in confidence. Failure to report to a relevant person suspicion of abuse relating to someone else is a breach of REED's policy, and could lead to disciplinary action being taken.

4.2.6 Fraternalization

In a very high risk situation and in line with DFAT Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy, REED will prohibit fraternalization for all non-national personnel. A specific clause will be included in employment agreements as relevant.

4.2.7 Failure to act upon suspected or reported sexual harassment, abuse or exploitation

The REED's code of conduct states that it is the duty and the responsibility of all managers, employees and representatives to report, in line with this policy, any suspicions or incidences of inappropriate behavior. All REED's employees and partners are obliged to report any suspicions or incidences of inappropriate behavior towards others. Where possible, confidentiality will be maintained; information will only be shared as required by law or to facilitate investigation. Failure to report to a relevant person, suspicion of abuse relating to someone else is a breach of REED's policy.

5. GUIDELINES

5.1 Organization-Wide Risk Management

REED has an organization-wide risk management framework. Risks of sexual violence are included in this framework and are regularly monitored. High and very high risks activities will be reported to each board meeting.

5.2 Human Resources

5.2.1 Safer Recruitment Practices

REED will ensure high standards are adhered to during recruitment, selection and screening of all personnel. This includes employees, volunteers, consultants, vendors and others who may be engaged with REED. If the person being recruited will be working with children, an assessment of suitability to work with children and young people will be undertaken, including seeking references, police checks and working with children checks. Recruitment processes must follow REED's HR Policy.

All personnel must sign REED's code of conduct and child safeguarding policy and employment agreements will have specific clauses related to preventing sexual violence.

5.2.2 Induction and training

All employees will receive induction on the PSEAP upon accepting employment with REED, including a briefing on related REED's policies and values. Commitment to the rights of women training will be included in this induction. Information and advice will also be provided about how to report concerns and where to seek further information about safeguarding and safer practices across the organization.

Training on PSEA and safeguarding will be mandatory for all REED's employees. This training will be carried out on a regular basis, and will be commensurate with employee's role in the organization. Overall responsibility for ensuring that staff

receive regular training and awareness raising activities lies with the CEO. The CEO needs to prioritise PSEA training for the staff.

5.2.3 Support to employees

In orienting employees on the Sexual Exploitation and Abuse Policy, REED will seek to equip employees to receive reports of abuse or respond to disclosure in ways which affirm and support survivors, and ensure the best interest of the survivor is the first consideration. Support for employees involved in the process will be provided through a relevant supervisor and additional external support can be provided.

5.2.4 Support to victims/survivors

Support will be offered to survivors and victims, regardless of whether a formal internal response is carried out (such as an internal investigation). Support can include specialist psycho-social counselling and/or access to other specialist and appropriate support as needed. Survivors and victims can choose if and when they would like to take up the support options available to them.

5.3 Awareness raising and risk management to stakeholders

REED is committed to ensuring that safeguarding mechanisms are embedded in its programs and partnership development as follow:

5.3.1 REED 's PSEAP and wider safeguarding policies will be promoted and risk management undertaken throughout its work with stakeholders when:

- 5.3.1.1** Conducting due diligence assessment prior to MOU with an organization and regularly during the partnership;
- 5.3.1.2** Developing project design including project risk management framework and complaint handling processes;
- 5.3.1.3** Appraising the project;
- 5.3.1.4** Negotiating project agreements (partners will be required to commit to zero tolerance of sexual exploitation, abuse and harassment);
- 5.3.1.5** Monitoring of project, stakeholders and risks;
- 5.3.1.6** Developing capacity building plan when relevant; and
- 5.3.1.7** evaluating projects.

5.3.2 REED will educate its employees and other stakeholders about how to reduce SEAH risk and ensure organizational activities protect both adults and children. This should include discussions about power imbalances, local status and workplace cultures and how they impact on work and personal relationships.

5.3.3 REED will strive to ensure that stakeholders have an informed understanding of what behaviors are inappropriate and how to report, investigate, document and manage sexual misconduct incidents.

5.3.4 Feedback from communities on REED and stakeholders' role and employee behaviors, as well as, complaints, should be actively sought. REED will strive

to develop transparent and accessible complaints mechanisms and reporting processes together with partners and project participants. Designated, and ideally senior, REED staff should present feedback to communities on what changes have been made resulting from complaints.

5.3.5 Employees working directly with project participants must receive training on how to receive complaints and disclosures.

5.4 Visits to schools in districts

In addition to employees, REED programs are occasionally visited by Board or Committee members and other representatives, as well as by participants organized by REED. Due diligence checks will be conducted prior to visits being undertaken and visitors will also be requested to sign the REED code of conduct. REED will ensure that only necessary visits are conducted to local communities and, in most cases, will only allow visitors to visit its stakeholders. Visitors will be accompanied by a REED employee at all times when visiting the local communities.

A risk assessment will also be conducted in liaison with partners to ensure potential risks of sexual abuse and exploitation are mitigated. Prior to, or at the commencement of each visit, REED will confirm with stakeholders and the local communities that staff have been made aware of their obligations and that they have signed the REED's codes of conduct.

5.5 Communications Risk Management

Personnel should be guided and bound by the REED's Communication Policy and the associated procedures at all times when taking photographs. REED has a system in place to ensure that any public materials are in compliance with the above policy and procedures. Children and young people are vulnerable to abuse and exploitation when using online sites and channels, including social media sites. Risks to children online include: online grooming, sexual abuse or sexualized language or posting of inappropriate content, bullying and discrimination (threats, shaming, and humiliating, teasing, discrimination). REED staff, including volunteers, are not to connect with or form relationships with any person under 18 who they meet through REED-related work. REED will strive to ensure that risks in the online and physical environment are identified and mitigated without compromising a child's right to privacy and healthy child development. The online environment should be used in accordance with the REED's code of conduct, Computer and Internet Policy, and Communications Policy.

5.6 REED's Education Activities Risk Management

REED conducts educational activities in Nepal. Employees and representatives working on those activities on behalf of the organization will be required to comply with all REED policies and processes in order to prevent instances of sexual exploitation and abuse. All risks and mitigation measures will be recorded in the organizational risk matrix, and any risks that is classified as high or very high will be communicated and reported to the board.

5.7 Breach of this Policy or REED's codes of conduct

REED personnel must immediately report:

- Any breach of the codes of conduct or behavior that they suspect may be sexual exploitation or abuse or policy non-compliance by REED's personnel, including employees, volunteers, consultants, contractors, donors or members of the Board or Committees;
- Any report made by anyone relating to sexual exploitation and abuse or policy non-compliance by REED. It is the responsibility of personnel to report the incident, not investigate it.

5.8 Incident Reporting and Handling

The process for reporting a breach of this policy is outlined in Annex B. The REED's Procedures Manual outlines the procedures for assessing the report, the steps that may be taken to investigate, manage and close off the report. An Incident Report Form is available. REED will treat all concerns raised seriously (providing immediate notification to donors where relevant) and ensure that all parties are treated fairly and the principles of natural justice will be taken into account. All reports will be handled professionally, confidentially and efficiently.

5.9 Roles and responsibilities

Creating a safe working environment at REED and within working environment is everyone's responsibility and failure to act on concerns or disclosures relating to sexual harassment, abuse and exploitation is not an option.

5.9.1 Board and CEO

It is the responsibility of the board and CEO to ensure effective sexual exploitation and abuse safeguarding mechanisms across all REED areas of operations, including within partner organizations. Any actual or suspected incidents of sexual exploitation or abuse, including child abuse, must be reported to the CEO or to the REED Chair if the complaint concerns the CEO. Contact details of the CEO and REED's Chair are published on the organization's website and REED's implementing partners are provided with explanations on the reporting procedures with contact details, together with the incident report template. Incident reports will be provided to the board on a routine basis.

5.9.2 Managers

Managers and senior employees are responsible for ensuring that REED's PSEA policy and procedures, in particular reporting procedures are understood and implemented by the employees, other personnel and volunteers under their supervision and responsibility, and the partner organizations with whom they work. They are also responsible for the creation and maintenance of an environment which prevents sexual exploitation and abuse and promotes the implementation of REED's codes of conduct. Each manager can act as a resource person for questions about what constitutes sexual exploitation or abuse or policy non-compliance. Managers also act

as the first point of contact to receive formal incident reports and will report to the CEO as mentioned above.

5.9.3 Employee

All employees have the responsibility to ensure compliance with REED's PSEA Policy. Employee in charge of a particular project will ensure partners are aware of REED's incident reporting process including the CEO contact details. They may assist the partner in this process when necessary. All REED employees are obliged to report any suspicions of sexual exploitation, abuse or harassment of others. This can be done without sharing details of cases where information has been shared in confidence. Failure to report to a relevant person suspicion of abuse relating to someone else is a breach of REED's policy, and could lead to disciplinary action being taken. For the avoidance of doubt, there is no obligation placed on any individual to report any incident that has happened to them.

5.9.4 Sexual Exploitation and Abuse Prevention Focal Person

REED's Head of Programs is the delegated REED staff member with portfolio responsibility for the prevention of sexual exploitation and abuse for the REED Nepal. This person has overall responsibility for the development and implementation of PSEA Policy and activities across REED, including training, identifying and coordinating training and learning opportunities for REED stakeholders.

6. Annexes

ANNEX A: DEFINITIONS

ANNEX B: INCIDENT REPORTING PROCEDURES

ANNEX A
DEFINITIONS OF KEY TERMINOLOGY USED IN THIS DOCUMENT

Child and young person: any person under the age of 18 years.

Child abuse and exploitation: physical, sexual or emotional abuse, neglect, bullying, child labor and family violence.

Coercion covers a whole spectrum of degrees of force. In addition to the use of physical force, it may involve psychological intimidation, blackmail or other threats. For instance, threats of being dismissed from a job or of not obtaining a job that is sought. It also occurs when a person is unable to give consent (E.g. while drugged, asleep, drunk or mentally incapable).

Family violence: Family/Domestic Abuse is any incident or pattern of incidents of controlling, coercive or threatening behavior, violence or abuse involving family. This may include people who are, or have been, intimate partners or family members regardless of gender or sexuality.

Fraternization: Any relationship that involves, or appears to involve, partiality, preferential treatment or improper use of rank or position including but not limited to voluntary sexual behavior. It could include sexual behavior not amounting to intercourse, a close and emotional relationship involving public displays of affection or private intimacy and the public expression of intimate relations. Where significant power imbalance is at play the potential for exploitative fraternization is increased.

Modern slavery: Slavery is a situation where a person exercises (perceived) power of ownership over another person. Modern slavery encompasses a spectrum of labor exploitation, ranging from the mistreatment of vulnerable workers to human trafficking to child labor and forced sexual exploitation. Forced labor includes work or services that people are not doing voluntarily but under threat of punishment; human trafficking, which involves deceptive recruitment and coercion; and bonded labor, which is demanded in repayment of a debt or loan.

Sexual abuse: The term “sexual abuse” means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with a child is considered as sexual abuse. “Physical intrusion” is understood to mean “sexual activity”. “Sexual abuse” is a broad term, which includes a number of acts, including “rape”, “sexual assault”, “sex with a minor”, and “sexual activity with a minor”.

Sexual exploitation: 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. “Sexual exploitation” is a broad term, which includes a number of acts, including “transactional sex”, “solicitation of transactional sex” and “exploitative relationship”. It is not limited to the act of sexual intercourse.

Sexual harassment: Sexual harassment is unwanted conduct of a sexual nature.

Sexual Harassment is Not SEA. Conduct or behavior of a sexual nature is considered SEA when this conduct or behavior amounts to either sexual exploitation or sexual abuse. Sexual harassment can be directed towards one person, groups of people or towards everyone and can occur as one-off incident or be a pattern of harmful behavior. Anyone can experience sexual harassment, and REED recognizes the specific and varied challenges faced by women, men, transgender people and others when experiencing it.

The effect of sexual harassment is to violate the dignity of another person, and to create an intimidating, hostile, degrading, humiliating or offensive environment for them and others. Sexual harassment can take many forms, including:

Verbal and Non Verbal: Verbal comments of a sexual nature, such as remarks about an employee's appearance, questions about their sex life or offensive jokes, sexually suggestive comments or jokes. Non-verbal such as displaying pornographic or explicit images, staring, sexual gestures or written comments of a sexual nature such as offensive or inappropriate, and inappropriate advances on social networking sites.

Behavioral and physical: Physical such as unwanted physical contact, touching, fondling including brushing up against someone, and assault (including attempts and threats to do these things).

When addressing allegations of sexual harassment, REED is concerned with the impact of the behaviors on the person making the complaint, not the intention of the person accused. An action or behavior can still be considered sexual harassment even if the alleged harasser didn't intend for it to be harmful. All staff members, contractors and affiliated workers have the right to be protected from sexual harassment in the workplace. This protection comes from both employment law and criminal law.

Sexual violence: Acts of a sexual nature against one or more persons or that cause such person or persons to engage in an act of a sexual nature by force, or by threat of force or coercion, such as that caused by fear of violence, duress, detention, psychological oppression or abuse of power, or by taking advantage of a coercive environment or such person's or persons' incapacity to give genuine consent. Forms of sexual violence include rape, attempted rape, forced prostitution, sexual exploitation and abuse, trafficking for the purpose of sexual exploitation, child pornography, child prostitution, sexual slavery, forced marriage, forced pregnancy, forced public nudity, forced virginity testing, etc.

Under age marriage: The custom of marrying off young children, particularly girls, is found in many parts of the world. This practice – legal in many countries – is a form of sexual violence, since the children involved are unable to give or withhold their consent.

Vulnerable adult abuse presents in many forms including: sexual, psychological, financial/ material, discriminatory, physical, family violence and self-neglect. A vulnerable adult is a person “who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation”.

ANNEX B

INCIDENT REPORTING PROCEDURES

B.1. How to report an incident or raise a concern?

Anyone can raise a concern, make a complaint or report an incident to REED about something they have experienced or witnessed. This can be done verbally or in writing as per the following process:

- a. Immediately advise the most senior REED staff member on site. If not on Site-advise by telephone. Follow this verbal report up with a file note outlining the conversation, date and the person's name - to whom made the report.
- b. Immediately and confidentially advise the REED CEO. If the incident concerns the CEO, confidentially contact the Board Chairperson.
- c. Ask the person affected by the sexual abuse or sexual exploitation whether they would like a support person present whilst the incident is documented. This should be undertaken by the most senior staff member on site. It is important to ensure support is provided to the person affected. The importance of confidentiality should be explained to the support person clearly and in the local language.
- d. Complete a REED Incident Report Form detailing the incident in as much detail as possible and treat it as a highly confidential document. If an incident involved alleged sexual abuse or physical assault only record minimal information and refer to the police.
- e. Contact REED CEO or the Chairperson if the incident concerns the CEO. Email the form and report the incident by phone.
- f. If an allegation is made against a person, then he/she must inform their line manager immediately. They should also promptly complete an incident report form, sign and date it and record the details as they recall them and send a copy of this to REED.
- g. All those involved, including the accused, should be treated with respect and all allegations will be treated confidentially, shared only as required by law or to facilitate investigation.

B.2. What will happen next?

REED is committed to responding and taking appropriate action in response to all complaints and concerns of abuse. The responses will be according to the REED policies. All reports will be handled professionally, confidentially and expediently. When a complaint or concern has been raised, it must be referred promptly and within 72 hours as per the process detailed above. In remote communities, with limited communication options, this process may take longer than 72 hours but it should always be done as soon as practicable, without delay. A person making a report will not

be considered to have breached any code of professional conducts or ethics.

The person alleged to have breached the policy will be given the opportunity to present their view of the events in question. REED will withhold its findings and determination until the investigation is fully completed. The identity of the victim, the person reporting the incident and the person alleged to have violated the policy must be kept confidential throughout the reporting and investigation processes. REED will not tolerate any form of coercion, intimidation, reprisal or retaliation against any employee who reports any form of abuse or exploitation, provides any information or other assistance in an investigation.

In liaison with the relevant employee and/or stakeholders and in consultation with a representative from the Board, the CEO will report the incident to donors where relevant, investigate the situation, discuss the allegations and decide upon the next step. This may involve reporting to police. Where safe to do so and when in accordance with the wishes of the victims, all alleged SEAH incidents that involve a criminal aspect should be reported through the correct law enforcement channels. During the investigation, the following may be enacted:

- Conduct additional interviews with the person/persons (including child and/or parents as appropriate) who made the allegations or other witnesses to gather more information with which to make a decision;
- Conduct interview/s with the alleged offender;
- Gather other relevant evidence when possible;
- If deemed appropriate, suspend the person whom the allegations have been made against from duties with pay during the course of the investigation.

Pending the results of the investigation, the CEO (or the Chairperson if the incident concerns the CEO), will decide on the following:

- Taking no further action.
- Further education on the PSEAP and REED's Codes of Conduct;
- Formal warning and monitoring;
- Transfer to alternative duties;
- Dismissal/end of contract/end of volunteer engagement.

CONTACT PEOPLE:

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