

***SADO - Policy on Protection from Sexual Exploitation and Abuse- PESA***

***and Child Protection***

1. Introduction and Preamble

SADO - places human dignity at the centre of its relief and development work. At the

heart of SADO’s efforts to impact poverty and social justice is its engagement with marginalized

Communities, and vulnerable adults and children.

Vulnerable adults and children are particularly at risk of sexual exploitation and abuse. This policy

defines SADO -’s commitment to the protection from sexual exploitation and abuse (PSEA)

of vulnerable adults, involving SADO Employees and Related Personnel. In recognition of the special

vulnerability of children, this policy also affirms SADO’s commitment to the welfare and protection

from sexual exploitation and all forms of abuse of children, involving SADO Employees and Related

Personnel.

SADO - has a zero tolerance toward sexual exploitation and abuse and child abuse. SADO

- takes seriously all concerns and complaints about sexual exploitation and abuse and

child abuse involving SADO Employees and Related Personnel. SADO initiates rigorous investigation of

complaints that indicate a possible violation of this policy and takes appropriate disciplinary action, as

warranted.

2. Scope of Application

This policy applies to all SADO Employees and Related-Personnel.

3. Definitions

3.1 Children and vulnerable adults

A child is any individual under the age of 18, irrespective of local country definitions of when a

child reaches adulthood.1

Vulnerable adults are defined as:

• those aged over 18 years and who identify themselves as unable to take SADO of themselves/

protect themselves from harm or exploitation; or

• who, due to their gender, mental or physical health, disability, ethnicity, religious identity,

sexual orientation, economic or social status, or as a result of disasters and conflicts, are

deemed to be at risk.

1 Definition of child from the InterAgency Standing Committee (-) Guidelines to implement Minimum

Operating Standards for Protection from Sexual Exploitation and Abuse by UN and non-UN Personnel, March

2013.

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3.2 Sexual Exploitation2

Sexual exploitation means any actual or attempted abuse of a position of vulnerability,

differential power, or trust, for sexual purposes, including, but not limited to, profiting

monetarily, socially or politically from the sexual exploitation of another.

3.3 Sexual Abuse

Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by

force or under unequal or coercive conditions.

3.4 Child Exploitation and Abuse (involves one or more of the following)

a. Physical abuse

Physical abuse occurs when a person purposefully injures or threatens to injure a child or young

person. This may take the form of slapping, punching, shaking, kicking, burning, shoving or

grabbing. The injury may take the form of bruises, cuts, burns or fractures.

b. Emotional abuse

Emotional abuse is inappropriate verbal or symbolic acts toward a child or a pattern of failure

over time to provide a child with adequate non-physical nurture and emotional availability. Such

acts have a high probability of damaging a child’s self-esteem or social competence.

c. Neglect

Neglect is the failure to provide a child (where they are in a position to do so) with the

conditions that are culturally accepted as being essential for their physical and emotional

development and well-being.

d. Child Sexual Abuse

Child sexual abuse is the involvement of a child in sexual activity that s/he does not fully

comprehend, give informed consent to, or for which s/he is not developmentally prepared and

cannot give consent, or that violates the laws or social taboos of society. It is evidenced by an

activity between a child and an adult or another child who by age or development is in a

relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the

needs of the other person. It may include, but is not limited to, the inducement or coercion of a

child to engage in any unlawful sexual activity, the exploitative use of a child in prostitution or

other lawful sexual practices or the exploitative use of pornographic performances and

materials.

e. Grooming

Grooming generally refers to behaviour that makes it easier for an offender to procure a child

for sexual activity. It often involves the act of building the trust of children and/or their SADOrs to

gain access to children in order to sexually abuse them. For example, grooming includes

encouraging romantic feelings or exposing the child to sexual concepts through pornography.

f. Online grooming

Online grooming is the act of sending an electronic message with indecent content to a recipient

who the sender believes to be less than 18 years of age, with the intention of procuring the

recipient to engage in or submit to sexual activity with another person, including but not

necessarily the sender.

2 Definitions of “sexual exploitation” and “sexual abuse” from the United Nations Secretary General’s Bulletin:

Special measures for protection from sexual exploitation and sexual abuse.

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3.5 Sexual Exploitation and Abuse

Use of the term “Sexual exploitation and abuse” throughout this policy refers to children as well

as vulnerable adults.

3.6 SADO Employees and Related Personnel

The term “SADO Employees and Related Personnel” includes all employees of SADO

-, SADO Members, SADO Affiliates and SADO Country Offices. The term also includes

board members, volunteers, interns, and - and local consultants, in addition to

individual and corporate contractors of these entities and related personnel. This includes non-

SADO entities and their employees and individuals who have entered into partnership, sub-grant

or sub-recipient agreements with SADO.

4. Background

In December 2006, SADO - endorsed the “The Statement of Commitment on Eliminating

Sexual Exploitation and Abuse by UN and Non-UN personnel”, including Standards to support progress

made towards eliminating sexual exploitation and abuse by personnel. On the same occasion, SADO

- reaffirmed its goal of achieving full implementation of the six Core Principles adopted in

2002 by the Inter-Agency Standing Committee (-) Working Group on Prevention and Response to

Sexual Exploitation and Abuse. In March 2020, SADO - expanded its policy on protection

from sexual exploitation and abuse to specifically incorporate the broader concerns on child abuse.

These affirmations demonstrate the determination by SADO to prevent and respond to acts of sexual

exploitation and abuse and child abuse by SADO Employees and Related-Personnel. The Core

Principles and Statement of Commitment form the basis of this policy.

5. Core Principles3

In order to protect the most vulnerable populations, particularly vulnerable adults and children, and

to ensure the integrity of SADO - activities, the following six Core Principles must be

adhered to:

5.1 Sexual exploitation and abuse and child abuse by SADO Employees and Related Personnel

constitute acts of gross misconduct and are therefore grounds for termination of employment.

5.2 Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of

the majority or age of consent locally. Mistaken belief in the age of the child is not a defence.

5.3 Exchange of money, employment, goods, or services for sex, including sexual favours or other

forms of humiliating, degrading or exploitative behaviour by SADO Employees and Related

Personnel is prohibited. This includes the exchange of assistance that is due to program

participants.

5.4 Sexual relationships between SADO Employees/Related Personnel and program participants

are strongly discouraged since they are based on inherently unequal power dynamics. Such

relationships undermine the credibility and integrity of SADO’s relief and development work.

3 The six Core Principles are from the UN Secretary-General’s Bulletin on Special Measures for Protection from

Sexual Exploitation and Abuse. They have been modified by SADO - to refer to

child abuse and “SADO Employees and Related Personnel”.

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5.5 Where a SADO Employee or Related Personnel develops concerns or suspicions regarding sexual

abuse or exploitation and child abuse by a fellow worker, whether in SADO or not, he or she

must immediately report such concerns via the established agency reporting mechanisms. 4

5.6 SADO Employees and Related Personnel are obliged to create and maintain an environment that

prevents sexual exploitation and abuse and child abuse and promotes the implementation of this

Policy. SADO Managers at all levels have particular responsibilities to support and develop

systems, which maintain this environment.

6. Commitments5

SADO - is dedicated to fulfilling the six Core Principles through implementation of the

following Commitments. This includes time-bound, measurable indicators of progress to enable all

entities of SADO -, and others, to monitor SADO’s performance.

6.1 Develop organization-specific strategies to prevent and respond to sexual exploitation and

abuse and child abuse, including incorporating appropriate job responsibilities (such as staff

training, complaints and response mechanisms, and coordinating high-level oversight and

progress reports by directors) in specific staff positions to support and ensure effective

implementation of organization strategies to prevent and respond to sexual exploitation and

abuse.

6.2 Undertake risk assessments to identify areas of risks and document steps that are being taken to

remove or reduce these risks.

6.3 Incorporate SADO’s standards on sexual exploitation and abuse and child protection in relevant

codes of conduct and in induction materials and training courses for SADO Employees and

Related Personnel, including specific provisions for child sexual exploitation and abuse.

6.4 Ensure that when engaging in partnerships, sub-grant or sub-recipient agreements, these

agreements a) incorporate this Policy as an attachment; b) include the appropriate language

requiring such contracting entities and individuals, and their employees and volunteers to abide

with a Code of Conduct that is pursuant to the standards of this Policy; and c) expressly state

that the failure of those entities or individuals, as appropriate, to take preventive measures

against sexual exploitation and abuse and child abuse, to investigate and report allegations

thereof, or to take corrective actions when sexual exploitation or abuse or child abuse has

occurred, shall constitute grounds for SADO to terminate such agreements.

6.5 Regularly inform SADO Employees and Related Personnel and communities on measures taken

to prevent and respond to sexual exploitation and abuse and child abuse. Such information

should be developed and disseminated in-country in cooperation with other relevant agencies

and should include details on complaint mechanisms, the status and outcome of investigations in

general terms, feedback on actions taken against perpetrators, and follow-up measures taken as

well as assistance available to complainants and survivors. Any information that is not of a

general nature and concerns specific cases must respect confidentiality for all parties involved,

including the survivor and family, employee or related personnel, and the ongoing investigation

process, particularly where there are legal implications.

4 The established complaints mechanism may at times be an internal SADO mechanism however SADO is also

committed to participating in inter-agency community based complaints mechanisms in humanitarian contexts

and therefore inter-agency complaints mechanisms may be the established system in some contexts.

5 The Commitments are based on the Statement of Commitment Relating to Sexual Exploitation and Abuse by UN

and non-UN Personnel, August 2008.

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6.6 Engage the support of communities and governments to prevent and respond to sexual

exploitation and abuse and child abuse by SADO Employees and Related Personnel.

6.7 Ensure that complaint mechanisms for reporting sexual exploitation and abuse and child abuse

are accessible and that SADO focal points for receiving complaints understand how to discharge

their duties. This should include a documented reporting procedure in a relevant local language

for sexual exploitation and abuse and child abuse allegations and policy for non-compliance in,

including available sanctions for breaches.

6.8 Provide support and assistance to complainants of sexual exploitation and abuse or child abuse.

This may include medical treatment, legal assistance and psychosocial support as appropriate

and according to the wants and needs of the survivor whilst also taking account of

confidentiality, cultural sensitivities and survivor safety.

6.9 In compliance with applicable laws, prevent perpetrators of sexual exploitation and abuse and

child abuse from being (re)hired or (re)deployed. Managers and Human Resource teams must

ensure robust recruitment screening processes for all personnel, particularly for personnel who

will have any direct or indirect contact with children. This could include use of background and

criminal reference/ record checks, verbal referee checks, and interview plans that incorporate

behavioural-based interview questions.

6.10 Investigate allegations of sexual exploitation and abuse and child abuse in a timely and

professional manner. This includes the use of appropriate interviewing practices with

complainants and witnesses, particularly with children. Engage professional investigators or

secure investigative expertise as appropriate.

6.11 Take swift and appropriate action, including legal action when required, against SADO

Employees and Related-Personnel who commit sexual exploitation and abuse and child abuse.

This may include administrative or disciplinary action, and/or referral to the relevant

authorities for appropriate action, including criminal prosecution, in the abuser’s country of

origin as well as the host country.

6.12 Take appropriate actions to the best of SADO’s abilities to protect persons from retaliation

where allegations of sexual exploitation and abuse or child abuse are reported involving SADO

Employees or Related Personnel.

6.13 Ensure high-level oversight and information systems on sexual exploitation and abuse and child

abuse reports received and actions taken, in order to monitor effectiveness, report progress and

improve efforts to prevent and respond to sexual exploitation and abuse and child abuse.

7. SADO Employee and Related Personnel Standards

SADO -’s capacity to achieve its vision and mission depends upon the individual and

collaborative efforts of all SADO Employees and Related Personnel. To this end, all SADO Employees

and Related Personnel must uphold and promote the highest standards of ethical and professional

conduct and abide by SADO’s policies. This policy sets the minimum standards to be followed by all

SADO Employees and Related Personnel to protect program participants and communities from

sexual exploitation and abuse and child abuse by SADO Employees and Related Personnel.

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The need for this policy flows from a recognition that our work often puts SADO Employees and

Related Personnel in positions of power in relation to the communities we work with, especially

vulnerable adults and children. SADO Employees and Related Personnel have an obligation to use their

power respectfully and must not abuse the power and influence they have over the lives and well-

being of the participants of SADO programs and others in the communities where SADO works.

These Standards apply to all SADO Employees and Related Personnel and are intended to provide an

illustrative guide for employees and related personnel to make decisions that exemplify SADO’s Code

of Conduct and core values in their professional and personal lives. Any violation of these Standards is

a serious concern and may result in disciplinary action, up to and including dismissal, in accordance

with disciplinary procedures of each SADO - Member or Affiliate and applicable laws. All

SADO Employees and Related Personnel must sign these standards. Employees and individuals of non-

SADO entities that have entered into partnership, sub-grant or sub-recipient agreements with SADO

may instead sign their employer’s code of conduct and standards if they are consistent with these

standards.

7.1 SADO Employees and Related Personnel will not request any service or sexual favour from

participants of SADO programs, children or others in the communities in which SADO works, in

return for protection or assistance, and will not engage in sexually exploitative or abusive

relationships.

7.2 SADO Employees and Related Personnel will not exchange money, employment, goods or

services for sex, including sexual favours or other forms of humiliating, degrading or exploitative

behaviour. This prohibition against exchange of money for sex means SADO Employees and

Related Personnel may not engage the services of sex workers.

7.3 SADO Employees and Related Personnel are strongly discouraged from having sex or engaging

in sexual activities with program participants because there is an inherent conflict of interest

and potential for abuse of power in such a relationship. If an employee engages in sex or sexual

activities with a program participant, the employee must disclose this conduct to his /her

supervisor for appropriate guidance. Failure to report such conduct may lead to disciplinary

action pursuant to SADO’s policies and procedures.

7.4 SADO Employees and Related Personnel must refrain from sexual activity with any person under

the age of 18, regardless of the local age of consent, i.e. the local or national laws of the country

in which the employee works. Ignorance or mistaken belief of the child’s age is not a defence.

Failure to report such a relationship may lead to disciplinary action pursuant to SADO’s policies

and procedures.

7.5 SADO Employees and Related Personnel will not support or take part in any form of sexual

exploitative or abusive activities, including, for example, child pornography or trafficking of

human beings.

7.6 SADO Employees and Related Personnel will treat all children with respect and not use language

or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative,

demeaning or culturally inappropriate.

7.7 SADO Employees and Related Personnel will not hire children for domestic or other labour

which is inappropriate given their age or developmental stage, which interferes with their time

available for education and recreational activities or which places them at significant risk of

injury.

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7.8 SADO Employees and Related Personnel will protect, manage and utilise SADO human, financial

and material resources appropriately and will never use SADO resources, including the use of

computers, cameras, mobile phones or social media, to exploit or harass participants of SADO

programs, children or others in the communities in which SADO works.

7.9 When photographing or filming a child for work-related purposes, SADO Employees and Related

Personnel will:

• comply with local traditions or restrictions for reproducing personal images,

• obtain informed consent from the parent or guardian of the child, before photographing or

filming a child, explaining how the photograph or film will be used,

• ensure photographs, films, videos and DVDs present children in a dignified and respectful

manner and not in a vulnerable or submissive manner,

• ensure children are adequately clothed and not in poses that could be seen as sexually

suggestive,

• ensure images are honest representations of the context and the facts, and

• ensure file labels do not reveal identifying information about a child.

7.10 SADO Employees and Related Personnel must immediately report any concerns or suspicions

they have regarding possible violations of this Policy by a SADO Employee or Related Personnel

via SADO’s reporting mechanism. Employees and Related Personnel must report any such

concerns even when the person who may be in violation of this Policy is Related Personnel, as

previously defined, and not a SADO Employee.

7.11 SADO Employees and Related Personnel will prevent, oppose and combat all exploitation and

abuse of children.

7.12 Wherever possible, SADO Employees and Related Personnel should work with another adult

present when working with children.

7.13 SADO Employees and Related Personnel must immediately disclose charges, convictions and

other outcomes of an offence that relates to child exploitation and abuse including those under

traditional law.

7.14 Sensitive information related to incidents of sexual exploitation and abuse or child abuse

whether involving colleagues, program participants or others in the communities in which SADO

works shall be shared only with enforcement authorities and SADO agents and employees of the

appropriate seniority or function who have a need to know such information. Breach of this

policy may put others at risk and will therefore result in disciplinary procedures.

7.15 SADO Employees and Related Personnel must undertake to create and maintain an environment

that promotes implementation of this policy.

7.16 Directors, managers and supervisors at all levels have particular responsibilities to support and

develop systems that maintain an environment that facilitates implementation of this policy and

which is free of sexual exploitation and abuse and child abuse.

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8. Responsibilities

8.1. All SADO Employees and Related Personnel

All SADO Employees and Related Personnel share an obligation to prevent and respond to sexual

exploitation and abuse and child abuse. It is the responsibility of all SADO Employees and

Related Personnel to uphold the Core Principles and Commitments of this policy along with the

Standards for SADO Employees and Related Personnel. All SADO Employees and Related

Personnel must sign the Standards. SADO Employees and Related Personnel, who work with

communities concerned, will also contribute to regular monitoring by seeking feedback from

program participants.

8.2. Senior Managers, Supervisors and Human Resource Managers

Senior Managers, Supervisors and Human Resource Managers must ensure that all SADO

Employees and Related Personnel understand and comply with this policy and sign the

Standards for SADO Employees and Related Personnel. Human Resource Managers are also

responsible for robust recruitment, induction and training, whilst Senior Managers and

Supervisors are responsible for performance management to prevent sexual exploitation and

abuse and child abuse.

8.3. Country Directors/Representatives/SADO senior leadership in any country/region

Country Directors or representatives must provide clear guidance and demonstrate how the

organization, across its operations, will ensure that vulnerable adults and children are protected

from sexual exploitation and abuse in the delivery of projects and program in-country.

Country Directors must ensure that culturally appropriate community-based complaint

mechanisms are developed, implemented, and monitored and reviewed for effectiveness. This

includes awareness-raising with program participants and SADO Employees and Related

Personnel about protection from sexual exploitation and abuse and child abuse and how to use

the complaints mechanism. Country Directors will also ensure that complaints handling and

investigation procedures are enacted, along with appropriate employee disciplinary procedures

as necessary. Country Directors are responsible for the provision of appropriate survivor

assistance.

8.4. SADO - Members and Affiliates

SADO Members and Affiliates will ensure this policy is reflected in their own codes of conduct.

SADO Members and Affiliates are responsible for defining workplans and procedures to uphold

and operationally this policy. Members and Affiliates must have in place complaints and

investigation procedures and employee disciplinary procedures which complement and support

Country Office procedures.

SADO Lead Members will provide the necessary support to Country Offices to ensure Country

Offices have in place complaints mechanisms, investigations procedures, survivor assistance

support, and guidelines for monitoring, review and reporting against this policy.

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8.5. SADO - Secretariat

The SADO - Secretariat will coordinate oversight of this policy in collaboration with

SADO Member focal points, and review and update according to the timeframe specified in the

policy. The SADO - Secretariat will monitor and report against this policy utilising

standardised data for global accountability.

9. Associated Policies

This policy is complementary to the set of standards of behaviour that all SADO employees are

required to adhere to in the SADO - Code of Conduct and Code of Ethics and any further

codes or related policies defined by SADO Members, Affiliates and Country Offices.

This Policy is also a response to SADO’s accountability to the communities it works with and is

therefore to be operationally d as part of the broader SADO - Accountability Framework.

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