



Policy name	Protection from Sexual Exploitation and Abuse and Child Protection Policy
Date of implementation	June 2018
Date of last review	NA (new)
Date of next review	May 2020
Purpose of review (if any)	
Related documents	Anti-discrimination and harassment policy Whistleblowing policy

1. Introduction

PWYP as an organisation primarily works with adults. Any work with children and/or vulnerable adults is limited, however when that does occur we have strict principles and rules in place covering sexual exploitation and abuse of these vulnerable groups of people.

This policy applies to anyone with a **direct relationship with PWYP (“Related parties”)** including employees, consultants; governing body members (including Board members, Global Council members, Africa Steering Committee members); volunteers and interns; meeting delegates and training participants. In addition we expect visitors and guests at any of our offices and/or events to abide by requirements of this policy. This includes non-PWYP entities and their employees who have entered into partnership, sub-grant or sub-recipient agreements with PWYP.

This policy outlines PWYP’s commitment to the protection from sexual exploitation and abuse of children and vulnerable adults, involving those PWYP Related parties.

PWYP has a zero tolerance toward sexual exploitation and abuse. PWYP takes seriously all concerns and complaints about sexual exploitation and abuse and child abuse involving PWYP Related parties. PWYP initiates rigorous investigation of complaints that indicate a possible violation of this policy and takes appropriate disciplinary action, as warranted.

2. Definitions

2.1 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.

Vulnerable adults are defined as:

those aged over 18 years and who identify themselves as unable to take care 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.

2.2 Sexual Exploitation

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.



2.3 Sexual Abuse

Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

2.4 Child Exploitation and Abuse

Child Exploitation and Abuse involves one or more of the following (detailed explanation in Annex B)

- Physical abuse
- Emotional abuse (including verbal abuse)
- Neglect
- Child Sexual Abuse
- Grooming
- Online grooming.

2.5 Sexual Exploitation and Abuse

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

3. Core Principles

In order to protect the most vulnerable populations, particularly vulnerable adults and children, and to ensure the integrity of PWYP activities, the following six Core Principles must be adhered to:

- 3.1. Sexual exploitation and abuse and child abuse by PWYP Related parties constitute acts of gross misconduct and are therefore grounds for termination of employment/contract or loss of office in the case of a governing member or removal from PWYP meeting or event.
- 3.2. 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.
- 3.3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour by PWYP Related Parties is prohibited.
- 3.4. Sexual relationships between PWYP Related Parties and programme participants are strongly discouraged since they are based on inherently unequal power dynamics.
- 3.5. Where a PWYP Related Party develops concerns or suspicions regarding sexual abuse or exploitation and child abuse by a fellow Related Party, he or she must immediately report such concerns via the secretariat reporting mechanisms (see Annex C).
- 3.6. PWYP Related Parties are obliged to create and maintain an environment that prevents sexual exploitation and abuse and child abuse and promotes the implementation of this Policy.

4. Commitments

PWYP 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 PWYP, and others, to monitor PWYP’s performance.

- 4.1 Undertake a risks assessment of all meetings/programme activities which involve children or vulnerable adults and document steps that are being taken to remove or reduce these risks.



- 4.2 Incorporate PWYP's standards on sexual exploitation and abuse and child protection in relevant codes of conduct, Governance manual and in induction materials and training courses for PWYP Related Parties.
- 4.3 Ensure that when engaging in partnerships, sub-grant or sub-recipient agreements, these agreements incorporate this Policy as an attachment; and 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 PWYP to terminate such agreements.
- 4.4 Ensure that complaint mechanisms for reporting sexual exploitation and abuse and child abuse are accessible (Annex C).
- 4.5 Seek necessary support for complainants of sexual exploitation and abuse or child abuse.
- 4.6 In compliance with applicable laws, never knowingly recruit perpetrators as staff, consultants or governing members prevent perpetrators of sexual exploitation and abuse and child abuse.
- 4.7 Investigate allegations of sexual exploitation and abuse and child abuse in a timely and professional manner through the use of professional investigators or secure investigative expertise as appropriate. Take swift and appropriate action, including legal action when required, against PWYP Related Parties who commit sexual exploitation and abuse and child abuse.
- 4.8 Take appropriate actions to the best of PWYP's abilities to protect persons from retaliation where allegations of sexual exploitation and abuse or child abuse are reported involving PWYP Related Parties.

5. Commitments

PWYP's capacity to achieve its vision and mission depends upon the individual and collaborative efforts of all PWYP Related Parties. To this end, all PWYP Related Parties must uphold and promote the highest standards of ethical and professional conduct and abide by PWYP's policies.

All PWYP Related Parties must sign these standards (Appendix II) or in the case of short meetings we will use the email footer (Appendix IV)

6. Responsibilities

All PWYP Related Parties share an obligation to prevent and respond to sexual exploitation and abuse and child abuse. It is the responsibility of all PWYP Related Parties to uphold the Core Principles and Commitments of this policy along with the Standards for PWYP Related Parties. All PWYP Related Parties must sign the Standards.

The Senior Management Team at PWYP secretariat must ensure that all PWYP Related Parties understand and comply with this policy and sign the Standards for PWYP Related Parties. The Senior Management Team at PWYP is also responsible for robust induction, training, and performance management to prevent sexual exploitation and abuse and child abuse. The PWYP Secretariat will report all complaints under this policy to the PWYP Board of Trustees immediately.



Regional Coordinators must provide clear guidance and demonstrate how the organisation, across its operations, will ensure that vulnerable adults and children are protected from sexual exploitation and abuse in the delivery of PWYP projects in-country.

We also encourage all PWYP coalitions to adopt this policy or to ensure that their own policy as a minimum meets the requirements under this policy.



Appendix I – Standards to be signed by all parties¹ (see separate Declaration document)

I,, of agree to abide by all of the undernoted standards. I understand that failure to do so will result in disciplinary action/removal from office/expulsion from PWYP, etc. Local Law enforcement agencies will also be informed where it is alleged that an illegal act has been committed

- 1.1 PWYP Related parties will not request any sexual service or favour from participants of PWYP programmes, children or others in the communities in which PWYP works, in return for protection or assistance, and will not engage in sexually exploitative or abusive relationships.
- 1.2 PWYP Related parties will not exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour.
- 1.3 PWYP Related parties are strongly discouraged from having sex or engaging in sexual activities with programme participants
- 1.4 PWYP Related parties must refrain from sexual activity with any person under the age of 18, regardless of the local age of consent.
- 1.5 PWYP Related parties 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.
- 1.6 PWYP Related parties 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.
- 1.7 PWYP Related parties will not hire children for domestic or other labour which is inappropriate given their age or developmental stage
- 1.8 PWYP Related parties will never use PWYP resources, including the use of computers, cameras, mobile phones or social media, to exploit or harass participants of PWYP programs, children or others in the communities in which PWYP works.
- 1.9 When photographing or filming a child for work-Related purposes, PWYP Related parties 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.

¹ Includes: employees, consultants; governing body members (including Board members, Global Council members, Africa Steering Committee members); volunteers and interns; meeting delegates and training participants. In addition, we expect visitors and guests at any of our offices to confirm to these standards.



- ensure that the parent or guardian is informed, and consent to, about what is being photographed/filmed, for what reason and use
- 1.10 PWYP Related parties must immediately report any concerns or suspicions they have regarding possible violations of this Policy by a PWYP Related parties via PWYP's reporting mechanism.
 - 1.11 PWYP Related parties will prevent, oppose and combat all exploitation and abuse of children.
 - 1.12 One of the child's caregivers **should be present** when PWYP Related parties are working with children.
 - 1.13 PWYP Related parties must immediately disclose charges, convictions and other outcomes of an offence that relates to child exploitation and abuse including those under traditional law.
 - 1.14 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 PWYP works shall be shared only with enforcement authorities and PWYP 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.
 - 1.15 PWYP Related parties must undertake to create and maintain an environment that promotes implementation of this policy.



Appendix II Child exploitation and abuse (involves one or more of the following)

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

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.

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.

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.

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.

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 carers 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.

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.



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Appendix III Reporting Mechanism

In the first instance report should be made to the Executive Director(epeter@publishwhatyoupay.org) in writing . In the event the complaint is about the Executive Director, then the complaint should be directed the Chair of the PWYP Board (board.chair@publishwhatyoupay.org). Given the size of the PWYP secretariat, it is not equipped to deal with such complaints internally and therefore an independent professional would be appointed to investigate all reports made under this policy.



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Appendix IV – Email footer

“Protection from Sexual Exploitation and Abuse and Child Protection Policy

PWYP International Secretariat strives to offer an environment where Vulnerable adults and Children are protected from Abuse and exploitation. By agreeing to attend this meeting or event you agree to abide by our Protection from Sexual Exploitation and Abuse and Child Protection Policy . Failure to do so will result in you being required to leave the meeting. “