



Protection from Sexual Exploitation and Abuse (PSEA) Policy

Updated August, 2023

Doctors For You (DFY) is committed to fostering a safe environment in its Initiatives, through proactive, accessible and effective approaches to prevent and respond to sexual exploitation and abuse (SEA). Sexual exploitation and abuse perpetrated by humanitarian or development personnel is a criminal act that violates fundamental human rights. DFY will act ethically and with integrity and will ensure that all parties involved with DFY will not abuse the power and trust that comes with being part of our DFY. DFY will not tolerate any form of abuse, exploitation, or harm carried out towards rights holders, community members, or adults at-risk (defined as someone over the age of 18 who, for physical, social, economic or environmental factors are more vulnerable to abuse, exploitation and other harms).

The purpose of clear PSEA and safeguarding policy is to ensure that procedures are in place to protect all parties involved including the rights holders, communities we work with, including adults at-risk, from sexual abuse or exploitation, or other harmful and inappropriate behaviour, carried out by any member of the Doctors For You or DFY representative. Every aspect of our work must be carried out in a way that ensures the rights and dignity of rights holders, community members, and adults at-risk. We are committed to working with them to ensure that they are not simply safe from harm but safe to realise their rights and be active agents of change.

DFY is committed to preventing any form of sexual harassment, exploitation and abuse and responding robustly if and when the harm occurs. No one will be victimised for making a complaint and DFY is committed to working with complainants and survivors to ensure they are central to any response, are not further harmed or disempowered by any processes, and receive support throughout. DFY will not tolerate any form of abuse, exploitation, or harm carried out towards our employees, rights holders, communities, or anyone we come into contact with through our work. We recognise that all forms of Sexual Harassment, Exploitation, and Abuse and other Safeguarding concerns, including abuse of adults at-risk, are rooted in an imbalance of power, particularly gendered and sexualised abuses of power. We recognise that when individuals in our sector carry out sexual exploitation and abuse towards those we have a duty to protect this inflicts harm and breaches human rights, breaks the trust placed in our sector, and jeopardises the credibility of all aid organisations. We recognise that gendered forms of sexual violence disproportionately affect 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 sexual violence 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 Safeguarding approach supports the work they do to promote their rights and live lives with dignity.

1. Purpose

We recognise that as an organisation with international presence, the work of DFY, those working with us have increased power and privilege. We are committed to safeguarding all people who come into contact with DFY through our work from abuse. This applies to everyone irrespective of race, age, gender, gender identity, sexual orientation, culture, dress, language, political affiliation, health status, class, caste, ethnicity, marital status, disability, location, pregnancy, and religion. This policy provides guidance and direction to anyone associated with Doctors For You so that:

- All DFY staff and other representatives understand the importance of preventing sexual exploitation and abuse, and their responsibility to ensure that they and their work do not

deliberately or inadvertently cause harm to rights holders and community members, including adults at-risk.

- All DFY staff and other representatives understand their role in preventing sexual exploitation and abuse, and the consequences of breaching this policy.
- All DFY staff and other representatives understand their responsibility to report any concerns relating to sexual exploitation and abuse and have access to clear guidelines on how to report suspected abuse.
- All organisational processes and structures reflect our duty of care towards rights holders and the communities we work with, including adults at-risk and put in place procedures to safeguard them in every aspect of our work so that we build a culture free from abuse, discrimination, and harm.
- DFY commits to uphold the highest level of personal and professional conduct amongst its staff, contractors, volunteers, board members and partners working in or visiting all programming contexts, particularly humanitarian settings, ensuring zero tolerance of all forms of sexual exploitation and abuse against affected populations and in times of conflict, disaster and occupation.

1.1 Difference between DFY's Protection from Sexual Exploitation and Abuse; Sexual Harassment, Exploitation, and Abuse at Work; and Child Safeguarding policies.

- DFY's SEA and Safeguarding approach seeks to prevent and robustly respond to all forms of sexual harassment, exploitation, abuse and other Safeguarding harms carried out by DFY's staff and other representatives towards anyone we come into contact with through our work. DFY's SEA and Safeguarding approach and policy positions are outlined in the overarching DFY's SEA and Safeguarding Policy.
- For concerns regarding children please refer to the Child Safeguarding policy. For concerns regarding sexually harassing, abusive, or exploitative behaviour towards staff and other DFY representatives please refer to the Sexual Harassment, Exploitation, and Abuse at Work policy. For any concerns regarding allegations of illegal and improper conduct and wrongful acts including, but not limited to, suspected fraud, criminal activity, or miscarriages of justice, please refer to the DFY's Whistleblowing Policy.

2. Scope

- This policy is binding for all persons acting for DFY or in collaboration with DFY, including the persons working with the DFY and partner organisations: employees; volunteers; board members; contractors; agency workers; consultants; suppliers and trainees (collectively, DFY representatives and partners).
- This is binding across offices and working locations of DFY, and at both the organisational and project level. Policies created at national office levels will include all elements of this policy and may only differ to ensure alignment with national legislation. Should this policy demand a higher standard than the local laws then this policy will prevail.
- All staff and representatives named above can raise a complaint via the procedures outlined in this policy.
- DFY Directors/Leadership Team and Board hold overall accountability for this Policy and its implementation. They are responsible for ensuring the policy is reviewed and updated every three years.
- Adherence to this policy will be reviewed through auditing mechanisms. Updates to the policy will be recommended through the Global SEA and Safeguarding Lead to the Director of HR who will seek approval from the Governing Body. In the case of

substantive changes to this policy, the International Board will seek approval from the Governing Body.

3. Definitions

- **Sexual Exploitation and Abuse (SEA):** forms of gender-based violence perpetrated by humanitarian or development workers, particularly in humanitarian settings. These acts can be committed against local communities, beneficiaries of direct assistance, or against DFY representatives and partners.
- **Sexual Exploitation:** Actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another.
- **Sexual Abuse:** Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Gender-based violence (GBV):** Any harmful act perpetrated against a person's will and based on socially ascribed (i.e. gender) differences between males, females, transgender and gender non-conforming people. Includes acts or threats of acts that inflict physical, sexual or mental harm or suffering, and other deprivations of liberty. SEA is a form of GBV, as survivors of SEA are often abused because of their vulnerable status as women, girls, boys and sometimes men.
- **Survivor:** A person who has experienced SEA, including those who self-identify as a victim or victim/survivor. 'Victim' is often used in medical and legal sectors. 'Survivor' is generally preferred in psychological and social support sectors because it implies resiliency. This policy is survivor-centered and employs that term. A survivor's choice of how to identify (as victim or survivor) will be respected and mirrored in our language.
- **Informed consent:** Ongoing agreement, voluntarily and freely given, based on a clear appreciation and understanding of the facts, and implications of an action. To give informed consent, a person must have all relevant facts when consent is given and be able to evaluate and understand the consequences of an action. They also must be aware of and have the power to exercise their right to refuse to engage in an action or to not be coerced (i.e. being persuaded based on force or threats).
- **Beneficiary of direct assistance:** A person who receives any assistance – including any type of goods and services – from DFY or a partner, regardless of the length of DFY's relationship with them.
- **Communities in which we work:** Any geographical location in which DFY or its partners directly or indirectly operates, providing either goods or services.
- **Report:** Informing a person designated under this policy about an incident of SEA for the purpose of initiating an investigation or disciplinary process.
- **Right Holder:** A rights holder is someone receiving assistance through our work. This is alternatively referred as a member of the affected population, person we seek to assist, person affected by crisis, or beneficiary. A rights holder is different to a community member in that a community member may not be engaging in our programmes and DFY must therefore be more aware of the risks that they face.
- **Young People:** Persons between the ages of 15 and 24 years. Within the category of "youth" and "young people", it is also important to distinguish between teenagers (13-19) and young adults (20-24).
- **Disclosure:** Informing a DFY employee or volunteer about an incident of SEA for the purpose of seeking support.

- **Sexual harassment:** Comments or actions based on a person's sex, sexual orientation, gender identity or gender expression that are unwelcome or should be known to be unwelcome.
- **Sexual assault:** Any touching of another person without their consent where the touching is of a sexual nature, or where the sexual integrity of the alleged victim is violated.
- **Sexual favour:** Sexual acts, often in exchange for money, goods or services. Includes inappropriate photography and filming. The process of sexual favours often takes place through transactional sex. Transactional sex is a common coping mechanism among people in severe situations of vulnerability.

4. Confidentiality

We are committed to working with survivors/complainants and all others involved in an incident management process in a confidential and respectful manner. Breaches of confidentiality undermine confidence and trust in DFY's Safeguarding and complaints management processes and in the organisation itself. Maintaining confidentiality around people's personal data and information is particularly important when managing issues relating to sexual harassment, exploitation and abuse. From the point of disclosure to the final outcome of any investigation, every effort will be made to maintain and promote confidentiality in order to protect the safety and privacy of everyone involved. Information must be shared on a 'Need to Know' basis – that is, only those who need to be informed so they can support an investigation or because they hold overall accountability will be given information, and they will receive only as much information as they need in order to be effective.

If information is shared confidentially which relates to a child or suggests that someone's life is in danger, then action will need to be taken outside of standard confidentiality procedures in order to ensure that everyone is safe. This will be managed on a case by case basis, and the safety and wellbeing of the child or adult in question is always paramount. As noted above, only those who need to know will be informed so they can take effective action.

4.1 Data Protection

DFY will ensure that it complies with local and international data protection laws when gathering, storing, or sharing any data relating to individuals and SEA and Safeguarding (e.g. in our fundraising, communications, and incident management approach), and will follow the guidance on retaining data on incident management.

5. Roles and Responsibilities

In line with DFY's survivor-centred approach, individuals do not have to report about something that they have experienced.

5.1 Staff must always:

- Ensure their behaviour is based on DFY's values, adheres to this policy and DFY's Code of Conduct, and always upholds and promotes the rights and welfare of rights holders and the communities we work with, including adults at-risk.
- Promote and raise awareness of this policy to everyone within their work.
- Report any suspicions, concerns, or behaviours that breach this policy to the appropriate person(s). More details on reporting can be found in Section 10.

- This includes (but is not limited to) any suspicions or incidents of sexual abuse and exploitation carried out by staff, other DFY representatives, partners, community members and others.
- Ensure that the rights of rights holders and communities are central to any activities carried out in their area of work.

Staff must never:

- Sexually exploit or abuse anyone we come into contact with through our work, this policy addresses harms carried out towards rights holders and community members, including adults at-risk in particular.
- Engage in any sexual activity with rights holders or adults at-risk
- Engage in any sexual activity with children.
- Engage in any kind of exploitative or harmful behaviour towards members of a community that DFY works with or near to.
- Raise malicious complaints or use the policy for purposes other than what it is intended for.

SEA and Safeguarding Focal Points must always:

- Work with others to create a safe environment where staff and others feel able to raise concerns without fear of retribution.
- Ensure that this policy is displayed at prominent places within the office, as well as online, and to make it accessible to all members of staff.
- Ensure that all inductions include a discussion of this policy.
- Deliver training to all staff on this policy and other policies that fall within the SEA and other Safeguarding concerns remit.
- Work with others to ensure that the values, commitments, and procedures set forth in this policy are embedded throughout all DFY's programmes and activities, and those of our partners.
- Ensure that they raise all concerns and complaints relating to SEA and Safeguarding to Safeguarding Team.
- Work with the SEA and Safeguarding Stakeholder Panel to address concerns relating to sexual exploitation and abuse, and ensure incident management is carried out in line with DFY's SEA and Safeguarding approach.
- Set a positive example both on and off duty.

Managers and Supervisors must:

- Take responsibility for creating and maintaining an environment that prevents SEA, encourages reporting, and promotes implementation of this policy.
- Ensure that incidents of SEA are promptly and adequately addressed in a way that demonstrates fairness, impartiality and respect for confidentiality, and is free from intimidation or favouritism.
- Have a personal responsibility to report or appropriately address any known act of SEA.
- Be free from gender bias and discrimination to ensure fairness when responding to disclosures or reports.
- Refrain from questions or judgment that imply blaming the survivor or disbelieving their experience based on gender identity.

Human Resources must always:

- Work with others to create a safe environment where staff and others feel able to raise concerns without fear of retribution.
- Work with the SEA and Safeguarding Focal Point to ensure that this policy is displayed at prominent places within the office, as well as online, and to make it accessible to all members of staff.
- Work with the SEA and Safeguarding Focal Point to ensure that all inductions include a discussion of this policy.
- Ensure that the values, commitments, and procedures set forth in this policy are embedded throughout the employee life cycle (including safer recruitment, performance management, and exit).
- Work with the SEA and Safeguarding Stakeholder Panel to address any concerns relating to abuse or exploitation of rights holders and communities, including adults at-risk by providing strong employment law and employee relations advice, and ensuring that all relevant DFY's policies and processes are followed correctly throughout the incident management process.
- Set a positive example both on and off duty.

Working with partners

- DFY's partners must abide by DFY's Code of Conduct and all SEA and safeguarding related policies. All memorandum of understandings (MoU) with partner organisations and consultancy agreements with consultants and suppliers should include this policy as an appendix when starting any project. Breaches can lead to termination of contractual and/or partnership agreements.
- DFY will work with all partners to ensure they receive training on DFY's SEA and Safeguarding policies and approach, and to ensure that spaces are created to share knowledge on best practice to address sexual exploitation and abuse and recognise the expertise of our partners in this area as well as our own approach.
- Staff working with partners must ensure that partner organizations and their staff sign up and abide by the DFY Code of Conduct. DFY must work with partners to carry out SEA and Safeguarding risk assessments and/or ensure that partners carry out their own SEA and Safeguarding risk assessments.
- DFY partners, by the nature of their work, interact with at-risk communities and will therefore be aware of sensitive information concerning rights holders and community members, including adults at-risk.
- Concerns regarding partner staff members must be reported immediately via the reporting mechanisms detailed below. If DFY receives a complaint about a member of staff at a partner organisation, DFY will work with the partner to ensure this is responded to quickly and appropriately. If there is reason to believe that a complaint has been dealt with inappropriately or inadequately by a partner, DFY must consider whether they will withdraw funding or end the relationship.

6. Safer Recruitment and Employee Lifecycle

- In line with best practice, stringent recruitment processes will be put in place in order to reduce the likelihood of engaging someone who may pose a SEA or Safeguarding risk to the communities we work with, and to staff and other representatives within the organisation. The following steps must be included in all Recruitment and Selection procedures:

- Job adverts and job descriptions clearly detail any role responsibilities relating to rights holders and communities, including adults at-risk, and the organisational values and commitment to SEA and Safeguarding. The job description is to be used as the primary basis of assessing an applicant's abilities.
- All interviews will include questions that assess an applicant's understanding of SEA and Safeguarding (including child safeguarding) and assess their ability to reflect on DFY values and feminist approach.
- Interviews for positions that involve working with adults at-risk or children must include behavioural based questions that assess the candidate's suitability to work with adults at-risk or children.
- Gaps in employment and/or education history will be discussed at interview.
- DFY will not knowingly appoint any person with a history of perpetrating any form of or sexual harassment, exploitation, and abuse, e.g. adult at-risk abuse, child abuse, or Gender Based Violence. DFY will ensure that recruitment of staff and other representatives will include reference checks (written and verbal where necessary).
- Consent will be sought from the successful applicant to request two references, including one from their most recent employer (or place of education), which provides, where permitted, the reason for leaving, and where appropriate, whether the candidate is suitable to work with adults at-risk.
- Relevant police/criminal records checks will be carried out in line with country requirements. Staff and other representatives in roles that involve having direct access to rights holders and community members, particularly adults at-risk, will require a self-disclosure of any convictions (relating to adult at-risk abuse and child abuse in any form) prior to interview stage and a criminal record check, wherever this is obtainable.
- This also applies to staff changing role internally, and those who are likely to be deployed, in which case a check should be completed in advance. In countries that have a database of sexual offenders or people not suitable to work with adults at-risk or children then this too will be checked.
- Proof of identity should be confirmed at the interview stage, and a hard copy added to the staff file.
- The Code of Conduct and the SEA and Safeguarding overarching policy are included alongside the offer letter to all new staff and representatives. The Code of Conduct must be signed by all staff and other representatives before commencing duties.
- All performance management processes and appraisals must include an assessment of how the individual upholds DFY's values and how SEA and Safeguarding intersects with their work.
- Ensure exit processes are carried out in person or remotely, learning is recorded and acted upon as appropriate, and any SEA and Safeguarding concerns raised at this stage are addressed appropriately
- Ensure references are provided in line with our HR policies, and that information on staff misconduct/disciplinary proceedings is shared with the prospective employer in line with best practice and our HR procedures.
- The SEA and Safeguarding Focal Point and HR will ensure all joining staff and other representatives have an induction on DFY's SEA and Safeguarding approach and this policy no later than one month after they have been appointed. It is the responsibility of the individual's Line Manager to ensure that this briefing is carried out.

7. Adherence

PSEA must be integral to its humanitarian, resilience and wider development work. We must recognise that rights holders and communities, including adults at-risk can be harmed as a result of poorly designed programmes and projects, and related activities. Staff members responsible for programme or project design and implementation must ensure that SEA and Safeguarding is accounted for at all stages of the programme/project cycle. Ensure the active participation of rights holders and communities, including adults at-risk in assessing, planning, implementing, monitoring and evaluating programs through the systematic use of participatory methods;

Recognise that sexual exploitation and abuse is often grounded in gender and other inequalities, DFY will ensure that development and humanitarian activities are conducted in a gender-sensitive manner, drawing on intersectional feminist analysis. This will include:

- Creating separate spaces for women, men, transgender and gender non-binary people to raise concerns and share ideas;
- Creating safe spaces for consultation and monitoring of programme activities based on strong contextual intersectional feminist and power analyses;
- Having a clear risk assessment in place for all programmes outlining sexual exploitation and abuse and safeguarding risks within the programme and putting in place measures to address these in programme plans.
- All development and humanitarian programmes will include community-based complaints mechanisms and reporting processes that are designed in collaboration with communities. A complaints mechanism should be set up to receive both safeguarding and non-safeguarding related concerns. We must enable concerns to be raised internally and externally, be transparent and accessible to the communities being supported, and ensure that concerns are responded to in a timely and robust manner.
- Ensure that this policy is in place, translated into a local language and communicated to and understood by DFY staff and other representatives, and the communities we work with.
- Ensure that all responses are developed in a manner that balances respect for due process with prioritising the safety, dignity and rights of survivors;
- Ensure that assistance for those affected is carried out in line with DFY's survivor-centred approach.
- Ensure that all staff and other representatives recognise their responsibility to maintain an environment that is free of sexual exploitation and abuse and to report any abuse they suspect or witness, whether within DFY or outside, in line with the reporting protocols outlined in this policy;
- Ensure that a copy of this policy will accompany all partner MOUs and discussions held with partners to further embed understanding and compliance.
- DFY recognises that there may be programmes where risks may be heightened e.g. short-term humanitarian projects; in these instances, rigorous safeguarding measures will be put in place, appropriate to the context, e.g. training, regular reviews.

7.1 Risk assessments

Risk assessments help identify areas in programme or project design where there is risk of exploitation and abuse taking place, or not being responded to adequately. Safeguarding risk assessments must be carried out at the organisational and project level and integrated into the organisational risk matrix. Efforts should be made by all parties concerned to reduce the identified risks. Mitigation strategies must be developed and be incorporated into the design, delivery, and evaluation of all programmes, operations, and activities

which in any way involve or impact on rights holders and community members, including adults at-risk. If this is not possible then the programme/activity should not proceed.

7.2 Complaint Mechanism

As part of embedding SEA and Safeguarding into all programme design and activities, complaints mechanisms must be established in order to ensure that rights holders and community members, including adults at-risk are able to raise concerns. Staff should work in a participatory way with rights holders and communities (e.g. local committees) to create, strengthen, and evaluate existing complaints mechanisms in line with best practice, and ensure that the mechanisms used are relevant to the local context, translated into local languages, and made publicly available (e.g. published on the website). As part of our commitment to accountability, staff must ensure that policies and procedures are shared with rights holders and community members, including adults at-risk so they can provide feedback and be instrumental in developing our approach.

The SEA and Safeguarding Focal Point can work with relevant teams to ensure that any complaints mechanisms are accessible, inclusive, survivor-centred, and relevant to the local context. It is critical that any complaints mechanisms provide a variety of ways of reporting, recognising that many people prefer to disclose allegations of abuse or exploitation to someone they trust, and that people are assured of confidentiality. Alongside developing complaints mechanisms, staff and partners must continually engage with rights holders and community members, including adults at-risk about DFY's values, what behaviour is and is not appropriate, their rights, and how to report concerns.

7.3 Emergency Response

Emergencies cover a wide range of events, from environmental disasters to politically driven, religious or ethnic conflict. During emergencies there can be an increased risk of sexual exploitation and abuse by staff, partners, and other representatives (e.g. from a sudden increase in staff, who have not been recruited in line with our standard procedures, or agreements being established with new partners more quickly than usual). The following provisions must be carried out during emergencies to mitigate risk:

- Ensure that this policy is in place, translated into a local language and communicated to and understood by all people connected with DFY during an emergency. This includes carrying out training, as appropriate, to ensure all DFY staff and other representatives are aware of our approach. This should be done as soon as is reasonably possible, and within 2 weeks at the latest.
- Referral and support mechanisms must be mapped as soon as possible. The Emergency Programme Manager and SEA and Safeguarding Focal Point are responsible for identifying the relevant statutory authorities (such as the police and/or social services) and other referral mechanisms in the concerned geography. An emergency mapping exercise should be carried out with support from the Protection Cluster.
- HR will follow safer recruitment and selection procedures as far as possible during an emergency. For example, asking questions around protection of rights holders and communities, including adults at-risk for those working directly with them.
- Carefully check offers of assistance (e.g. from new staff, partners, and volunteers). Where it is not possible to check backgrounds put measures in place to prevent abuse and exploitation, including carrying out risk assessments, carrying out regular 'spot' checks, and ensuring that rights holders and community members have access to complaints mechanisms.
- All Emergency Response Team members will be expected to undertake SEA and Safeguarding training in their main station of deployment.

8. Interaction with Rights Holders and Community Members, including Adults at-risk

DFY's duty of care towards rights holders and communities, including adults at-risk also exists in the process of gathering, aggregating and publishing any communications that could expose them to risk. Please see the Child Safeguarding Policy for guidelines on gathering content of children.

A risk assessment must first be conducted to assess whether and how to tell the stories and anonymise the identity of any community member, particularly adults at-risk, who is identified as:

- A victim of sexual abuse, exploitation or abduction
- A perpetrator of physical or sexual abuse
- Living with any illness, condition or identity that is known to attract social stigma – unless in carefully considered contexts the adult at-risk and/or their guardian wants to provide this

The following are practices that staff members must follow in the collection, storage and dissemination of communications material concerning rights holders and community members, with a specific focus on adults at-risk recognising that some adults at-risk for a range of factors may not be able to give informed consent:

- The adult at risk's best interests must always be the primary consideration. Content gathering must always be a positive experience for the adult at-risk and they must be in a safe and conducive environment protected from any kind of abuse.
- Data will be gathered, stored, and shared in line with local and international data protection laws.
- Seek the adult at risk's free, prior, and informed consent where possible. The adult at-risk needs to fully understand why they are being interviewed/photographed. For example, you could show examples of how their photos could be used.
- If the adult at-risk cannot give informed consent ensure that full parental or guardian informed consent is received before gathering or using any content relating to adults at-risk (e.g. interviews, images or footage of adults at-risk) and that they understand the purpose of this activity and how the images or footage will be used without posing any risk to the adult at-risk. Never photograph, video or interview a reluctant adult at-risk, even with parental or guardian consent.
- Never gather content that could shame, humiliate or degrade an adult at-risk, put them at risk immediately or at a later date, or perpetrate any form of abuse, discrimination and exploitation.
- Payment and/or gifts must not be given following content gathering as it can be confused with payment for information.
- If a contractor is used to gather content, they need to have a contract with DFY and have been briefed on this policy and signed DFY's Code of Conduct.

8.2 Visits

Supporters, donors and other visitors should receive a briefing on our values and DFY's Code of Conduct (with a copy to be signed), the SEA and Safeguarding Overarching Policy, and our SEA and Safeguarding approach (including instructions on content gathering, appropriate behaviours and how to raise concerns) before any visit.

9. Reporting procedures

If any DFY staff or other representatives have concerns that a rights holder or community member, including adults at-risk, has been or it at risk of being abused, exploited, or harmed in any way they must report this immediately.

Individuals do not have to report their own experience of sexual harassment, exploitation, or abuse, in line with DFY's survivor-centred approach. DFY staff and other representatives can report SEA and Safeguarding concerns in their DFY country to any of the following channels in person, via email, or telephone:

- SEA and Safeguarding Focal Point
- Director/CEO
- Line Manager
- HR Representative

If DFY staff or representatives have concerns about reporting or if they want to raise concerns (i.e. appeal against) how a process has been managed, they can report directly to: DFY PSEA and Safeguarding Team (safeguarding@doctorsforyou.org), Internal compliances team (compliance@doctorsforyou.org), DFY Whistleblowing Service (grievance@doctorsforyou.org).

SEA and Safeguarding Focal Points are responsible for reporting all concerns and complaints to the SEA and Safeguarding Team to ensure that the HQ Team has oversight of all SEA and Safeguarding concerns. The SEA and Safeguarding Focal Point must complete a SEA and Safeguarding Incident Reporting and send this to safeguarding@doctorsforyou.org within 24 hours of a concern being raised, where possible. The HQ SEA and Safeguarding Team will update the global case register and support the Focal Point and DFY team on a case by case basis to respond to all concerns and complaints raised, and monitor action taken.

The Concerned Director, through designated positions/teams, will work with the HQ SEA and Safeguarding Team to ensure that donors and others (e.g. other concerned Depts so that they can fulfil their own donor reporting requirements; statutory/regulatory bodies) are informed of SEA and Safeguarding concerns, in line with agreed requirements. Any concerns raised relating to sexual exploitation or abuse of rights holders or community members, including adults at-risk by DFY staff or other representatives will be addressed as a priority, in line with our SEA and Safeguarding approach. DFY will ensure that the safety, dignity and rights of the survivor are respected at all times. There is no time limit on when someone can raise a concern about something they have experienced. There may be limitations to how a historical concern can be addressed but DFY will take every reasonable measure to address the concern. We are committed to carrying out robust and fair investigations that protect the rights of all involved, with a particular focus on the survivor/complainant and the subject of the complaint, ensuring that confidentiality is maintained and that the wellbeing of all is protected.

As part of our survivor-centred approach, survivors/complainants can choose if, when, and how to make a report and decide whether they want DFY to take formal action. However, there may be occasions where DFY has a duty of care to respond even if the survivor/complainant does not want to take forward action. This will be managed on a case by case basis, following clear risk assessments and the safety and wellbeing of the survivor/complainant will be paramount.

All staff and other representatives are required to report if:

- A rights holder or community member, including an adult at-risk alleges that they or another person is experiencing or at risk of experiencing sexual exploitation or abuse - whether carried out by DFY staff and representatives, or others.
- A staff member or other representative suspects that someone connected to DFY is or may be about to carry out sexual exploitation and abuse towards rights holders, community members, adults at-risk or others.
- A staff member or other representative suspects that someone external to DFY (e.g. a Teacher or Community Leader) is or may be about to carry out sexual exploitation or abuse towards rights holders, community members, adults at-risk or others.
- If a staff member or other DFY representative does not report an incident or suspicion, they will be in breach of the Code of Conduct and may face disciplinary proceedings.
- Management of complex SEA and Safeguarding reports:

Nature of Concern Response	Response
Allegation about staff at a Partner Organisation	Concerns about staff at a Partner Organisation must be reported to the SEA and Safeguarding Focal Point. They will report to the designated person in the partner and work with the partner to ensure the matter is addressed swiftly and appropriately. This may be through the partner's internal process or through a joint process agreed by DFY and the partner.
Allegation about staff at another international aid agency	Concerns raised about the behaviour of staff of another international aid agency must be reported to the SEA and Safeguarding Focal Point. They will report to the designated person in the other organisation to ensure the matter is addressed. This may be through the other organisation's internal process or through a joint process agreed by DFY and the organisation. If DFY has concerns about the robustness or timeliness of the other organisation's response they should raise concerns to the appropriate channels in the organisation and consider termination of engagement if no action is taken.
Allegation relating to criminal activity and/or relating to a child where others have a remit to investigate	Allegations that staff or other representatives have carried out a criminal activity will be assessed by the SEA and Safeguarding Focal Point and the HQ SEA and Safeguarding Team. They will assess on a case by case basis if there are any risks involved in sharing to the police or other external bodies (e.g. if there are concerns that informing the police or others would put the survivor/complainant at risk). DFY is not a child protection agency and does not have the expertise required to carry out investigations of child abuse itself. This will be carried out by external experts brought in specifically for this purpose. For allegations in which external bodies (e.g. police) rather than DFY have a remit to investigate DFY will support the external process. DFY will monitor the external response to ensure that as far as possible it is carried out in line with DFY values, and using DFY's advocacy role to promote change where needed.
Staff member or other representative raises concerns about how a complaint and wants to appeal the decision	DFY staff members and representatives who disagree with actions taken must first appeal to the concerned country team. If they are dissatisfied with the response they receive to their appeal, they can make a second and final appeal to the HQ SEA and Safeguarding Team, who will work with the DFY Board to review the case. They can repeal the decision made by the DFY country if they find in favour of the staff member or other representative making the appeal.
Allegation raised by staff member or representative from one DFY country against a staff member or representative from another DFY country	Concerns raised that involve staff from more than one DFY country must be raised to the Global SEA and Safeguarding Team to take action. Recognising the shared reputational risk, when possible (e.g when a complainant wants to raise a complaint and or there is sufficient information to take forward an investigation) a joint incident management process will be established, involving staff from both countries as appropriate, and led by the Global SEA and Safeguarding Team and DFY Board. The risk will be monitored at the DFY Board level.

Nature of Concern Response	Response
Allegation raised against a Country/Executive Director	Concerns raised about a Country Director/CEO must be raised to their National Board, the DFY Board, and the HQ SEA and Safeguarding Team. Recognising the shared reputational risk, when possible a joint incident management process will be established between the National Board and DFY, and led by the HQ SEA and Safeguarding Team and DFY Board. The risk will be monitored at the DFY Board level.
Allegation raised against anyone in the Governing body or CEO	Concerns raised about anyone in the Governing Body or the CEO must be raised to the DFY Board and the Global SEA and Safeguarding Team who will ensure, when possible, that an incident management process takes place. The risk will be monitored at the DFY Board level.
Allegation raised against an DFY Board Member	Concerns raised about a Board Member must be raised to the HQ SEA and Safeguarding Team. If the allegation relates to a National Board Member then the DFY Board and the HQ SEA and Safeguarding Team will ensure, when possible, that an incident management process takes place, working with other members of the National Board as appropriate. The risk will be monitored at the DFY Board level. If the allegation relates to an International Board Member then the HQ SEA and Safeguarding Team will ensure, when possible, that an incident management process takes place, working with other members of the International Board and the CEO as appropriate. In both cases if a complaint is upheld, an assessment will be made on whether it is appropriate for the Board member to continue to serve on the Board.
Allegation about a SEA and Safeguarding Focal Point	Concerns raised about SEA and Safeguarding Focal Points must be reported to the Country/CEO and to the HQ SEA and Safeguarding Team who will take a joint decision on how to respond to the allegation and what incident management response is appropriate. The risk will be monitored at the DFY Board level.

10. Responding to Concerns and Complaints

10.1 Incident Management Process

Anyone can raise a concern or complaint. An individual can raise a complaint even if they have no evidence other than their own experience, recognising that sexual harassment, exploitation and abuse usually occur away from the public eye and therefore it can be difficult to produce evidence (e.g a witness). DFY will work with survivors and complainants to understand how they would like the issue they raised to be addressed; this policy does not prejudice the right of survivors and complainants to use external procedures (e.g criminal justice procedures) where that is their preference to do so. Support options will be offered to survivors and complainants regardless of whether or not they decide to make a formal complaint.

If a survivor or complainant makes a formal complaint and wants an investigation to be carried out, or if DFY takes the view that they have a duty of care to carry out an investigation, then an investigation process will be initiated, and must follow the HQ SEA and Safeguarding Team's Investigation Guidelines. The HQ and all DFY countries must have put measures in place to ensure that any investigations carried out are objective, timely, fair, and transparent and built on DFY's SEA and Safeguarding approach. All parties should be able to participate in the investigation without fear of retaliation.

Step 1: Complaint received (timeframe: actions taken within 48 hours)

- Within 24 hours the complaint is acknowledged and the SEA and Safeguarding Focal Point (or other staff member as appropriate) will engage with complainant/survivor to ensure they are safe and their concerns are understood. The HQ SEA and Safeguarding Team is informed so they can support as appropriate.
- The SEA and Safeguarding Stakeholder panel will triage all cases to assess what action can be taken. If an investigation cannot be carried out (e.g. if survivor does not want an

investigation or there is insufficient information to proceed) then the Panel will close the case and assess what other actions can be taken to address concerns e.g. awareness raising.

- Within 48 hours the SEA and Safeguarding Stakeholder Panel meet.
- Risk assessment carried out to address any immediate security or welfare concerns, and legal guidance sought.
- Investigation Team and separate Decision Making Panel appointed. This must be done in line with national laws.
- Investigation (timeframe: approx. 4 weeks but this may differ depending on nature and complexity of case).
- Following the investigation guidelines set out by the HQ SEA and Safeguarding team, an investigation can include carrying out any interviews, gathering any available evidence, and producing an investigation report.
- The complainant/survivor should be interviewed first (or provide a written response to questions submitted by the Investigation Team where a verbal interview is not possible), followed by any witnesses and the complainant if not the survivor, and then the subject of complaint. It is important to note that sexual exploitation and abuse in all its forms usually occurs away from the public eye and it therefore may be difficult to produce evidence. An individual can raise a complaint even if they can point to no objective evidence other than their own experience.
- The Investigation Report is submitted to the Decision Making Panel.

Decision (timeframe: actions taken within 72 hours)

- Decision making panel review report and take a decision on the report and its findings.
- The Decision Making Panel or others as appropriate to carry out any recommendations agreed on (e.g. disciplinary hearing, termination, awareness raising, policy development) with support from HR as required.

Outcomes shared and lessons learnt (timeframe: up to 1 week following decision made)

- Decision Making Panel document the decision and inform the complainant and subject of complaint.
- The Global SEA and Safeguarding Team is informed of the outcome.
- The subject of complaint and the complainant have the right to appeal against the decision, in line with DFY's HR policies and procedures. The complainant and subject of complaint can appeal in country.
- A case conference convened so that the SEA and Safeguarding Stakeholder Panel, Investigation Team, and Decision Making Panel can discuss learning from the case. Feedback must be sought from the survivor/complainant and incorporated into the lessons learnt conversation. Lessons learnt to be shared as appropriate, removing identifiable information, with governance boards and other relevant bodies to ensure key learning is shared and improvements made to practice

DFY is not a protection agency and does not have the expertise required to carry out investigations into adult at-risk abuse. This will be carried out by external experts brought in specifically for this purpose. However, DFY will refer cases to appropriate professionals and organisations and will ensure that referrals are made to professionals and organisations that act in line with DFY's values and puts the welfare of the adult at-risk as the highest priority. DFY will make a decision on a case by case basis on how allegations

of abuse or exploitation towards adults at-risk will be carried out, recognising that specific expertise may be required (for example, interviewing an adult who has intellectual disabilities).

10.2 Security in SEA and Safeguarding incident management

Recognising the inherent risk in addressing allegations of sexual exploitation and abuse, any internal responses to allegations of sexual exploitation and abuse must be carried out in line with DFY's security approach and Global Staff Safety and Security Policy.

10.3 Retaliation Against Complainants, Victims and Witnesses

DFY will take action against any staff or other representatives who seek to or carry out retaliatory action (e.g. intimidation, threatening behaviour) against complainants, survivors, witnesses or any others involved or believed to be involved in an incident management process. Staff who are found to have done this will be subject to disciplinary action, up to and including termination of employment.

10.4 False or malicious complaints

False or malicious allegations of sexual harassment, exploitation and abuse are extremely rare. However, if a member of DFY staff is found to have made an allegation that they knew to be false they will be subject to disciplinary action, up to and including termination of employment. It must be noted that if a case is not upheld that does not mean that the complaint was false, rather that there was insufficient evidence or that, even if the complaint is found not to reach the threshold for sexual harassment, it may represent harassment or sexist behaviour that is contrary to DFY policies and Code of Conduct.

11. Support Options

Support will be offered to survivors/complainants 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 psycho-social counselling, medical support, legal support and/or access to other specialist and appropriate support as needed. Survivors and complainants can choose if and when they would like to take up the support options available to them. DFY is committed to learning from survivors and being guided by them, where safe and appropriate to do so. DFY is committed to working with local NGOs and women's rights groups to develop learning on safe, intersectional, and feminist support options and ensuring that the support options offered meet the needs of diverse survivors. DFY will ensure support for adults at-risk is provided by appropriate professionals and organisations. DFY will ensure that cases are referred to them, and that due diligence is taken to ensure that they act in line with DFY's values and puts the welfare of the adult at-risk as the highest priority.

In line with our Child Safeguarding Policy, DFY will ensure support for children is provided by appropriate professionals and organisations. DFY will ensure that cases are referred to them, and that due diligence is taken to ensure that they act in line with DFY's values and puts the welfare of the child as the highest priority. If you have any questions about support options, please contact your SEA and Safeguarding Focal Point and/or the HQ SEA and Safeguarding Team (safeguarding@DFY.org).

Annex 1

Doctors For You - survivors/victims form for Gender-Based Violence (GBV)/Sexual Exploitation and Abuse (SEA)

Full Name of Survivor: _____

Gender: Male Female Other

Date of Birth: ____/____/____

Contact Information:

Phone Number: _____

Email: _____

Address: _____

Incident Information:

Date and Time of Incident: _____

Location of Incident: _____

Type of Incident: **Gender-Based Violence** **Sexual Exploitation and Abuse**

Description of Incident:

Please provide a brief description of what happened. Include any relevant details about the perpetrator(s), if known.

Support Needed:

Immediate Needs: Please select any immediate needs the survivor has:

- Medical attention
- Counselling/psychological support
- Legal assistance
- Safe shelter/housing
- Protection or safety measures
- Other: _____

Referral Information:

Referral Source:

Who is referring the survivor?

- Self
- NGO staff
- Other NGO
- Healthcare provider
- Police
- Other: _____

Referral Destination:

Where is the survivor being referred to? (Specify organization, department, or service)

Contact Person at Referral Destination: _____

Contact Information of Referral Destination: _____

Referral Date: ____/____/____

Reason for Referral:

Please provide a brief reason for the referral and any additional notes.

Consent and Signature: _____

I, undersigned/consent to the referral and the sharing of my information for the purpose of receiving services and support related to the incident of GBV/SEA.

Survivor's Signature: _____ Date: ____/____/____

Witness: _____

Witness: _____

Note: This form should be handled with the utmost confidentiality. Ensure that it complies with local data protection and privacy laws.

Annex 3 : Code of Conduct

Code of Conduct on Child Protection Agreement

We, , engaged by DFY agree that, We will:

1. Treat children with respect regardless of race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth, sexual orientation, or other status;
2. Not use language or gestures towards children that are inappropriate, harassing, sexually provocative, abusive, demeaning, belittling, or culturally inappropriate;
3. Be a good role model – We will not smoke, drink alcohol, take drugs, and consume pan ghutka misri in the presence of the children.
4. Respect the surroundings – we will not indulge in littering, spitting, defacing plants and the physical environment in any way.
5. Not engage children in any form of sexual activity or acts, including paying for sexual services or acts;
6. Wherever possible, ensure that another adult is present when working in the proximity of children;
7. Not invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger;
8. Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible;
9. Use technology such as computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any medium;
10. Refrain from physical punishment or discipline of children (excluding my own children);
11. Refrain from hiring 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;
12. Comply with all relevant Indian legislations, including labour laws in relation to child labour;
13. Immediately report concerns or allegations of child maltreatment in accordance with appropriate procedures; and
14. Not make any contact with the DFY beneficiaries outside the purview of the organization, which includes virtually through the Internet.

This covers the following;

- a. Meeting DFY beneficiaries outside the confines of the organization without the prior knowledge or consent of the organization and its child protection team.
- b. Adding DFY beneficiaries to your social networking sites such as Facebook, Google Plus, WhatsApp, Instagram, etc.
- c. Adding DFY beneficiaries to your blogging and micro- blogging sites such as Word Press, BlogSpot, Twitter, etc.
- d. Adding DFY beneficiaries to your messaging and chatting tools such as GTalk, Yahoo Messenger, Skype, Facebook Chat, Blackberry Messenger, etc.
- e. Exchanging telephone numbers and email addresses with DFY beneficiaries for the purpose of calling, mailing, texting, etc.

We understand that the onus is on me, as a person associated with DFY, to use common sense and avoid actions or behavior that could be construed as child exploitation and abuse.

In signing below, we certify that we have fully disclosed any accusations, charges, or convictions of child abuse, exploitation, or policy non-compliance to the DFY management prior to signing this Code of Conduct.

Organization/firm name:

Representative name & designation:

Authorized Signatory: date: -

Address:

Pin code

Mobile/Landline Number: -

Appendix 4: Process Flow for complaints

