

AGENTS OF PEACE



PREVENTING SEXUAL EXPLOITATION, ABUSE AND HARASSMENT (PSEAH) POLICY

Applicable to: Staff, volunteers, consultants, trainers, board members, interns, partners, contractors and other representatives of Agents of Peace

Geographical scope: Kenya, Somalia and all locations where Agents of Peace operates

Effective date: 15 September 2021

POLICY STATEMENT AND COMMITMENT

Introduction

Agents of Peace is committed to creating safe, respectful, inclusive and dignified environments for all people who participate in, benefit from, or work with the organization. As an organization working in peacebuilding, Youth, Peace and Security, preventing and countering violent extremism, governance, political participation, community engagement and capacity development, Agents of Peace recognizes that individuals involved in its programs may face different forms of vulnerability and unequal power relationships.

Agents of Peace has **zero tolerance for sexual exploitation, sexual abuse and sexual harassment (PSEAH)**. No person working for or representing Agents of Peace may use their position, authority, influence, resources or access to exploit, abuse, intimidate, harass or sexually exploit another person.

This policy establishes the organization's minimum standards for preventing and responding to sexual exploitation, abuse and harassment. It applies regardless of whether conduct occurs in an office, training venue, community, school, university, field location, online platform, accommodation facility, vehicle, official event or any other environment connected to Agents of Peace.

Our commitment

Agents of Peace commits to:

1. Preventing sexual exploitation, abuse and harassment.
2. Protecting program participants, staff, volunteers and other persons from sexual misconduct.
3. Providing safe and accessible channels for reporting concerns.
4. Responding promptly, fairly and confidentially to allegations.
5. Protecting complainants, survivors and witnesses from retaliation.
6. Respecting the dignity, rights and choices of survivors.
7. Taking appropriate disciplinary and corrective action when misconduct is substantiated.
8. Cooperating with lawful investigations and relevant authorities where appropriate.
9. Ensuring that staff and representatives understand their safeguarding responsibilities.
10. Integrating PSEAH into program design, recruitment, training, partnerships and monitoring.

Guiding principle

The safety, dignity and rights of every person must come before organizational reputation, personal relationships, financial interests or program objectives.

Agents of Peace will never conceal sexual exploitation, abuse or harassment to protect an individual, project, donor relationship, partnership or institutional reputation.

PURPOSE, SCOPE AND PRINCIPLES

Purpose of the policy

The purpose of this policy is to establish a clear institutional framework for:

- preventing sexual exploitation, abuse and harassment;
- defining prohibited conduct;
- establishing responsibilities;
- creating safe reporting mechanisms;
- ensuring appropriate response to allegations;
- protecting survivors and complainants;
- preventing retaliation;
- strengthening accountability; and
- ensuring that safeguarding is integrated into Agents of Peace programs.

Who is covered?

This policy applies to:

- Board members and senior leadership;
- employees and management;
- interns and apprentices;
- volunteers;
- consultants and trainers;
- community facilitators;
- peacebuilding and YPS representatives;
- drivers and support personnel;
- security personnel engaged by the organization;
- contractors and suppliers;
- partner organizations;
- implementing partners;
- visitors and representatives;
- individuals acting on behalf of Agents of Peace; and
- anyone participating in an Agents of Peace activity where the organization has responsibility for safeguarding.

Partners and contractors may also be required to comply with equivalent or stronger safeguarding standards.

Where does the policy apply?

The policy applies to conduct occurring:

- in Agents of Peace offices;
- during workshops, conferences and trainings;
- during community peace forums;

- in schools and universities;
- during field visits;
- during travel connected to work;
- in organizational accommodation;
- during official social events;
- through telephone or messaging applications;
- on social media;
- through email and other digital platforms; and
- in any situation where a person's relationship with Agents of Peace creates a professional or programmatic connection.

Core principles

Do no harm

Agents of Peace will design and implement programs in ways that minimize safeguarding risks.

Zero tolerance

Sexual exploitation, abuse and harassment are unacceptable regardless of the position, status, gender, age or influence of the alleged perpetrator.

Survivor-centered approach

The safety, dignity, confidentiality, wishes and wellbeing of survivors will be considered throughout the response process.

Non-discrimination

No person should be disadvantaged because they reported a concern or participated in an investigation.

Confidentiality

Information concerning allegations will be shared only with people who need the information for safeguarding, investigation, protection or legal purposes.

Accountability

Individuals found responsible for misconduct may face disciplinary, contractual or other appropriate action.

Non-retaliation

Retaliation against a person who raises a genuine concern or participates in an investigation is prohibited.

DEFINITIONS AND PROHIBITED CONDUCT

Sexual exploitation

Sexual exploitation means any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including obtaining financial, social or political benefit from the sexual exploitation of another person.

Examples include:

- demanding sexual favors in exchange for employment;
- demanding sexual favors in exchange for assistance or program benefits;
- offering money, employment, opportunities or services in exchange for sexual activity;
- exploiting someone's economic vulnerability for sexual purposes;
- using organizational authority to pressure someone into sexual activity.

Sexual abuse

Sexual abuse means an actual or threatened sexual act against another person involving force, coercion, unequal power, intimidation or circumstances where genuine consent cannot be freely given.

Sexual abuse may include:

- unwanted sexual touching;
- sexual assault;
- forced sexual acts;
- attempted sexual assault;
- sexual activity involving a child;
- coercing someone into sexual activity; and
- taking advantage of a person's inability to freely consent.

Any sexual activity involving a child is prohibited.

Sexual harassment

Sexual harassment includes unwanted sexual conduct that creates an intimidating, hostile, humiliating or offensive environment or affects a person's employment, participation or access to opportunities.

Examples include:

- unwanted sexual comments;
- sexual jokes;
- repeated requests for dates or sexual activity after refusal;

- sexual messages;
- sexually explicit images;
- comments about someone's body or sexual life;
- unwanted touching;
- sexual gestures;
- sexual propositions;
- sexualized bullying; and
- threatening professional consequences for refusing sexual advances.

Abuse of power

Abuse of power occurs where a person uses their organizational authority, influence or position to pressure, manipulate, threaten or exploit another person.

Power differences may exist between:

- supervisor and employee;
- trainer and trainee;
- project officer and community participant;
- donor representative and local organization;
- security personnel and community members;
- adult staff and young participants; or
- any other relationship involving unequal authority or access to resources.

STANDARDS OF CONDUCT

Expected behavior

Everyone representing Agents of Peace is expected to:

- treat others with dignity and respect;
- maintain professional boundaries;
- respect personal space and privacy;
- avoid inappropriate sexual conversations;
- avoid exploiting power differences;
- report safeguarding concerns;
- cooperate with investigations;
- respect confidentiality;
- protect children and vulnerable persons;

- follow organizational codes of conduct; and
- act responsibly both offline and online.

Prohibited behavior

Agents of Peace prohibits:

1. Sexual exploitation.
2. Sexual abuse.
3. Sexual harassment.
4. Sexual assault.
5. Sexual activity with children.
6. Sexual coercion.
7. Sexual relationships involving abuse of professional authority.
8. Sexual favors in exchange for money, employment, assistance or opportunities.
9. Retaliation against complainants or witnesses.
10. Sharing sexually explicit material through organizational communication channels.
11. Sexualized communication with program participants where it is inappropriate or exploitative.
12. Using organizational vehicles, accommodation, offices or events to facilitate sexual exploitation or abuse.
13. Recruiting, transporting, harboring or otherwise facilitating persons for sexual exploitation.
14. Concealing credible safeguarding concerns.
15. Interfering with an investigation.
16. Making malicious or knowingly false allegations.

Relationships and power

Agents of Peace recognizes that personal relationships can occur between adults. However, relationships involving significant professional power differences require particular caution.

A supervisor must not use their authority to initiate or maintain a sexual relationship where the relationship compromises professional judgment, creates coercion or affects employment decisions.

Staff must never condition employment, training opportunities, project participation, assistance or other benefits on sexual conduct.

CHILD SAFEGUARDING AND VULNERABLE PERSONS

Protection of children

Agents of Peace has a heightened responsibility to protect children and adolescents participating in its activities.

Staff and representatives must:

- treat children with dignity;
- maintain appropriate professional boundaries;
- avoid being alone with a child where organizational procedures require another responsible adult to be present;
- avoid inappropriate physical contact;
- never engage in sexual activity with a child;
- never request or exchange sexual images with a child;
- never use children for sexual purposes;
- report concerns about child sexual exploitation or abuse immediately through the appropriate safeguarding mechanism.

Vulnerable adults

Particular attention should be given to individuals who may face increased safeguarding risks, including:

- displaced persons;
- refugees;
- people affected by conflict;
- persons with disabilities;
- people experiencing poverty;
- survivors of violence;
- marginalized communities;
- persons dependent on humanitarian or development assistance; and
- individuals experiencing significant economic or social vulnerability.

Vulnerability must never be used as an opportunity for sexual exploitation.

Digital safeguarding

Agents of Peace activities may involve WhatsApp, email, Zoom, social media and other digital platforms.

Staff must not:

- send sexually explicit content to participants;
- request sexual images;
- engage children in inappropriate private communications;
- use organizational contacts to pursue sexual relationships improperly;
- threaten participants through digital communications; or
- share confidential safeguarding information publicly.

Official communication should remain professional and appropriate.

Training and awareness

All personnel should receive PSEAH orientation appropriate to their role. Personnel with direct contact with children, young people, community members or vulnerable groups should receive enhanced safeguarding training.

Training should cover:

- recognizing sexual exploitation, abuse and harassment;
- professional boundaries;
- power and vulnerability;
- reporting procedures;
- survivor-centered approaches;
- confidentiality;
- retaliation;
- child safeguarding; and
- digital safeguarding.

REPORTING MECHANISMS

Duty to report

Any person who has reasonable concerns about sexual exploitation, abuse or harassment connected to Agents of Peace should report the concern through an available reporting mechanism.

A person does not need to prove that misconduct occurred before raising a concern.

Reports may be made by:

- survivors;
- witnesses;
- staff;
- volunteers;
- community members;
- partners;
- parents or guardians;
- program participants; or
- other concerned persons.

Reporting channels

Agents of Peace should maintain multiple reporting channels, including:

Designated Safeguarding/PSEAH Focal Point

The organization should appoint a trained PSEAH/Safeguarding Focal Point responsible for receiving concerns and coordinating the initial response.

Name: _____
Telephone: _____
Email: _____

Senior management

A concern may be reported to the Executive Director or another designated senior officer where appropriate.

Confidential reporting

Where possible, Agents of Peace should provide a confidential reporting option for individuals who do not feel safe reporting through ordinary management structures.

External reporting

Where required by law or where appropriate to protect a survivor, Agents of Peace may facilitate referral to relevant authorities, professional services or specialized safeguarding organizations.

Anonymous reporting

Where operationally feasible, Agents of Peace should allow anonymous reports.

Anonymous reporting may limit the organization's ability to investigate or follow up, but it should not automatically be dismissed.

What should a report contain?

A report may include:

- what happened;
- when it happened;
- where it happened;
- who was involved;
- names of witnesses, if known;
- immediate safety concerns;
- available evidence; and
- preferred contact information, if the reporter wishes to provide it.

A person should not be required to repeatedly recount traumatic experiences unnecessarily.

RESPONSE TO ALLEGATIONS

Immediate response

When a concern is received, Agents of Peace should:

1. Listen respectfully.
2. Take the concern seriously.
3. Assess immediate safety risks.
4. Avoid blaming or judging the survivor.
5. Protect confidentiality.
6. Record the information accurately.
7. Refer the person to appropriate support where available.
8. Determine whether urgent action is required.
9. Consider whether legal or regulatory reporting obligations apply.
10. Begin an appropriate safeguarding response.

Survivor-centered response

The organization should seek to ensure that survivors are:

- treated with dignity;
- believed and listened to without prejudging the investigation;
- protected from retaliation;
- informed about available options;
- referred to appropriate support where available;
- involved appropriately in decisions affecting their safety; and
- not pressured to withdraw a report.

Confidentiality

Information relating to allegations must be handled carefully.

Personnel must not:

- discuss allegations with colleagues who have no role in the matter;
- publish names on social media;
- circulate screenshots or photographs unnecessarily;
- gossip about the allegation; or
- disclose survivor information without a legitimate safeguarding, legal or operational reason.

Confidentiality does not mean that allegations will automatically be kept secret from relevant authorities where disclosure is required by law or necessary to protect someone from serious harm.

Investigation

Where appropriate, allegations should be assessed and investigated through a fair and impartial process.

Investigations should:

- be conducted by suitably competent persons;
- avoid conflicts of interest;
- protect confidentiality;
- preserve relevant evidence;
- provide procedural fairness;
- avoid unnecessary re-traumatization;
- document findings; and
- result in appropriate action.

Where Agents of Peace lacks the expertise or independence necessary to investigate a serious allegation, it should consider using an appropriately qualified external investigator or specialist.

REFERRAL, SUPPORT AND PROTECTION

Survivor support

Agents of Peace should, where possible and appropriate, facilitate access to available services, including:

- medical care;
- psychosocial support;
- counseling;
- protection services;
- legal information;
- child protection services;
- emergency accommodation or protection where appropriate; and
- other specialized support.

Support should not depend on whether an investigation ultimately substantiates an allegation.

Protection from retaliation

Retaliation is prohibited.

Retaliation includes:

- dismissal because someone reported a concern;
- reducing someone's responsibilities as punishment for reporting;
- threats;
- intimidation;
- harassment;
- social exclusion;
- withholding legitimate benefits;
- damaging someone's reputation; or
- threatening witnesses.

Any retaliation may itself constitute misconduct and may lead to disciplinary action.

Protection of accused persons

Agents of Peace also recognizes the rights of persons accused of misconduct.

An allegation is not automatically proof of wrongdoing. Investigations should therefore be fair, impartial and based on available evidence.

The organization should avoid public accusations before appropriate procedures have been completed, while taking immediate protective measures where necessary.

False and malicious reports

Agents of Peace encourages good-faith reporting.

A report that cannot be substantiated is **not automatically a false report**.

However, knowingly making a malicious allegation with the deliberate intention of harming another person may constitute misconduct and may be subject to appropriate disciplinary action.

ROLES, RESPONSIBILITIES AND ACCOUNTABILITY

Board and leadership

The Board and senior leadership are responsible for:

- demonstrating commitment to PSEAH;
- approving and reviewing the policy;
- ensuring adequate resources;
- supporting safeguarding personnel;
- ensuring appropriate action is taken on serious allegations;
- preventing conflicts of interest; and
- promoting a culture of accountability.

Executive Director

The Executive Director is responsible for ensuring that:

- the policy is implemented;
- personnel receive appropriate training;
- reporting channels are operational;
- safeguarding risks are included in program planning;

- allegations are handled appropriately;
- retaliation is prevented; and
- donors and partners receive appropriate safeguarding assurances where required.

PSEAH/Safeguarding Focal Point

The focal point should:

- receive and document concerns;
- provide initial safeguarding guidance;
- assess immediate risks;
- coordinate referrals;
- maintain confidential records;
- advise management;
- support awareness and training;
- monitor implementation of this policy; and
- escalate serious matters appropriately.

The focal point should not investigate a matter where they have a conflict of interest.

Managers and supervisors

Managers must:

- model appropriate behavior;
- maintain professional boundaries;
- respond seriously to concerns;
- never discourage reporting;
- prevent retaliation;
- ensure staff understand their responsibilities; and
- escalate concerns through established channels.

Staff, volunteers and representatives

Every person covered by this policy is responsible for:

- complying with PSEAH requirements;
- maintaining professional conduct;
- reporting concerns;
- cooperating with safeguarding processes;
- protecting confidentiality; and
- completing required training.

Partners and contractors

Agents of Peace should require partners and contractors to comply with appropriate safeguarding standards.

Agreements may include:

- PSEAH clauses;
- codes of conduct;
- reporting obligations;
- safeguarding training requirements;
- audit or monitoring provisions; and
- consequences for serious breaches.

IMPLEMENTATION, MONITORING AND STAFF ACKNOWLEDGEMENT

Program-level safeguarding

PSEAH must be integrated into the project cycle.

Before implementing activities, Agents of Peace should consider:

- who may be vulnerable;
- where power imbalances exist;
- whether activities create opportunities for exploitation;
- risks associated with travel and accommodation;
- risks associated with working with children;
- risks created by digital communication;
- appropriate supervision arrangements;
- accessible reporting mechanisms; and
- referral pathways.

Recruitment and screening

Agents of Peace should use appropriate recruitment procedures to reduce safeguarding risks.

Depending on the role, these may include:

- safeguarding questions during recruitment;
- reference checks;
- verification of professional history;
- background checks where legally available and appropriate;
- signed codes of conduct; and
- mandatory safeguarding orientation.

Monitoring and review

Agents of Peace should periodically monitor the effectiveness of its PSEAH measures.

Monitoring may include:

- number of personnel trained;
- percentage of staff who signed the code of conduct;
- availability and awareness of reporting channels;
- safeguarding risks identified in projects;
- referrals made;
- implementation of corrective actions; and
- lessons learned from safeguarding incidents.

Confidential case information must not be unnecessarily included in routine reports.

Donor and partner compliance

Where required by donors or partners, Agents of Peace will align its PSEAH arrangements with applicable contractual safeguarding requirements and relevant national and international standards.

Where a donor or partner has stronger safeguarding requirements than this policy, Agents of Peace should seek to comply with the stronger standard where legally and operationally appropriate.

Policy review

This policy should be reviewed at least every two years, or earlier when:

- there is a significant safeguarding incident;
- legislation changes;
- organizational activities change substantially;
- donor requirements change; or
- lessons learned indicate that the policy needs strengthening.

STAFF AND REPRESENTATIVE ACKNOWLEDGEMENT

I confirm that I have read and understood the Agents of Peace Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy.

I understand that:

- sexual exploitation, abuse and harassment are prohibited;
- I am responsible for maintaining professional boundaries;
- I have a responsibility to report safeguarding concerns;
- retaliation against people who report concerns is prohibited;
- confidentiality must be respected; and
- breaches of this policy may result in disciplinary, contractual or other appropriate action.

Name: _____

Position: _____

Signature: _____

Date: _____

Witness/Manager: _____

Signature: _____

Date: _____

ANNEX 1 — PSEAH CODE OF CONDUCT

All Agents of Peace personnel agree to:

1. Respect the dignity and rights of every person.
2. Never sexually exploit or abuse another person.
3. Never sexually harass another person.
4. Never engage in sexual activity with a child.
5. Never exchange assistance, employment, money or opportunities for sexual favors.
6. Never abuse organizational authority.
7. Maintain appropriate professional boundaries.
8. Protect children and vulnerable persons.
9. Report safeguarding concerns.
10. Maintain confidentiality.
11. Cooperate with investigations.
12. Never retaliate against a complainant or witness.
13. Use digital communication responsibly.
14. Never use organizational resources to facilitate sexual exploitation or abuse.
15. Promote a safe and respectful organizational culture.

BASIC PSEAH REPORTING FORM

Date of report: _____

Person receiving report: _____

Name of person reporting, if willing: _____

Contact information, if willing: _____

Date/time of incident: _____

Location: _____

Description of concern:

Person(s) allegedly involved:

Witnesses, if known:

Immediate safety concerns:

Immediate action taken:

Referral required:

Reported to:

Follow-up required:

Confidentiality classification: Confidential

FINAL STATEMENT

Agents of Peace recognizes that preventing sexual exploitation, abuse and harassment is not simply a compliance requirement. It is a fundamental part of responsible peacebuilding, community engagement, youth programming, organizational leadership and respect for human dignity.

Every person associated with Agents of Peace has a role in creating an environment where people are safe, respected and able to participate without fear of sexual exploitation, abuse, harassment, intimidation or retaliation.

Agents of Peace is committed to a culture of prevention, protection, accountability and zero tolerance for sexual exploitation, abuse and harassment.