

VALUE HEALTH AFRICA

(VAHA)



**SAFEGUARDING POLICIES- CHILD PROTECTION AND SEXUAL
HARRASSMENT**

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CHILD PROTECTION POLICIES

1. Purpose, scope and audience

The purpose of Value Health Africa' Child Protection Policy (Policy) is to provide a framework for ensuring that children (defined as any human being under the age of 18 years, see Annex 1 on definitions) are protected from all forms of abuse and exploitation in all VAHA's operations, activities and programs. This Policy applies to all personnel that are engaged by VAHA, including its staff, consultants and volunteers. It also defines, under part 7 below, what is expected from VAHA's partners, funders, sponsors, suppliers and contractors regarding child protection.

This Policy is to be communicated to all relevant stakeholders and given its relevance to VAHA's pillars and mission; it will be part of the employment contract of all employees and volunteers. For all other personnel (defined as any individual contracted by VAHA, whatever his/her legal status, see Annex 1 on definitions), it is also an annex to the Code of Conduct and its relevant provisions are binding for all personnel required to sign the Code of Conduct.

2. VAHA's commitments on Child protection

- VAHA recognizes that children are one of the most vulnerable groups in society and that all children have the right to be safe and protected.
- VAHA acknowledges that preventing violence against, and abuse and exploitation of, children is a shared responsibility, and that prevention is paramount to child protection.
- VAHA is committed to protecting children from exploitation and abuse regardless of their nationality, culture, ethnicity, gender, religious or political beliefs, socio-economic status, family or criminal background, physical or mental health or any other factor of discrimination.
- VAHA is also committed to providing a safe environment for any child with whom it comes in contact, through implementing child-safe practices within its culture, programs and activities, policies and procedures. This Policy is to be known and understood by all personnel and implemented at all levels.
- VAHA is committed to ensuring that it, and anyone in contact with children in connection with the activities and programs of VAHA, abide by Cameroon's legislation and all other international legislation relevant to child protection.

3. VAHA's principles on child protection

The Policy and practices are guided by the following principles:

VAHA considers the following four principles, included in the United Nations Convention on the Rights of the Child (UNCRC), as paramount for the protection of the rights of the child:

- The right of all children to survival and development;

- The best interests of the child as a primary consideration in all decisions relating to children;
- The right of all children to express their views freely; and
- The principle of non-discrimination.

i. Zero tolerance of violence against children and child exploitation and abuse

VAHA:

- Strongly reaffirms that violence against children, child exploitation and abuse are never acceptable, in any form, location or setting, and that they have damaging and often long-lasting repercussions for children, their families and their communities;
- Recognizes that although all children may be vulnerable to violence, exploitation and abuse due to their size, age, physical and psychological maturity, dependence and lack of power, in some settings, some children may have heightened risk of violence, in particular those with a disability and children living in areas impacted by disasters (natural or conflict based) street or unaccompanied children and, in jurisdictions where early/forced marriage and pregnancy are prevalent as well as in relation to genital mutilation, female children;
- Will be responsible for protecting children from abuse of all kinds in the delivery of its programs and activities, in particular aid activities;
- Does not tolerate child exploitation and abuse, as such actions justify criminal, civil and disciplinary sanctions;
- Will not knowingly engage, directly or indirectly, anyone who poses an unacceptable risk to children’s safety or wellbeing, and will not permit any such person to work, or have contact with, children;
- Works to reduce the risks of child exploitation and abuse associated with delivering aid activities and trains its personnel on their obligations;
- Will not fund/work with any organization when there are concerns that this organization may not meet the VAHA’s child protection compliance standards in their operations and activities;
- Will not use, in its information materials or promotional materials, images of children or information on children which might affect their dignity or affect their rights.

ii. Sharing responsibility for child protection

To effectively manage risks to children, VAHA will seek the commitment, support and cooperation of all contractors, civil society organizations, and partners implementing VAHA activities. They must formally acknowledge the key principles of this Policy and must comply with these principles (see template in Annex 5).

a. Risk management approach

While it is not possible to eliminate all risk of child exploitation and abuse, careful management can reduce the risks to children that may be associated with aid activities. Any child protection risk must be identified, managed and documented during initial risk assessments and throughout the activity carried out by VAHA. VAHA provides guidance about ways to minimize risk to children. It has established standards of behavior which must be followed at all times when a person is in contact or working with children.

- In the Code of Conduct, which must be signed by any personnel contracted by VAHA, with the signed copy being kept in the files held by the Human Resources Department.
- Failure to comply with this Policy and/or the Code of Conduct will lead to disciplinary action, legal action, and/or criminal investigation and prosecution.

b. Procedural fairness

VAHA uses fair and proper procedures when making decisions that affect a person's rights or interests. VAHA also expects its partners to adhere to this principle when responding to concerns or allegations of child exploitation and abuse.

iii. Prevention of violence against children and child exploitation and abuse

The prevention of child exploitation and abuse by VAHA will be achieved through internal communication of this policy and training of the personnel:

- All personnel should be given the opportunity to discuss the Policy with their line manager and/or staff from the Human Resources Department, as part of their induction / orientation or as part of further personal development;
- VAHA provides mandatory training on child protection for its personnel, in order to ensure that the latter are fully aware of their responsibilities to protect children and how to report concerns or allegations about child exploitation and abuse;

Concerning the recruitment of all personnel whose functions will require them to work with, or have access to, children:

- All endeavors will be made to conduct a criminal background check;
- When obtaining this background check is not feasible, due to the context or the short duration of the contract:
 - The personnel concerned should sign a statutory declaration stating that they have never been convicted of, are not currently suspected of, or are not being prosecuted for any offence involving any type of harm to a child or children, and declare that

there is no element which could affect their suitability to work with children (see template in Annex 6);

- Careful consideration must take place about the appropriateness of the person working with VAHA;
- Qualifications and reference checks of former employers should be sought and interview plans for recruitment should incorporate behavioral-based interview questions.

4. Mechanisms of Review of Allegations

4.1 Code of Conduct and child protection against exploitation and abuse

The Code of Conduct, which must be signed by, all personnel, includes several rules that are crucial to child protection against exploitation and abuse (see Annex 2 to this Policy).

4.2 Report of breaches

- All personnel who have reasons to believe that a child may be exploited or abused, or that the safety or well-being of a child may be at risk, as a result of an action or abstention of a VAHA personnel, have the obligation to report it as soon as possible to the relevant authority in VAHA (Human Resources Department directly; or to the line manager, any Senior Manager, or Risk and Audit Management Department), who should in turn immediately inform the Head of Human Resources . Police authorities should be contacted as well, if circumstances and the possible seriousness of the acts require this.
- All reports and concerns raised by both personnel and individuals in the community will be properly considered, documented, and treated seriously, with care, discretion and in a timely manner. VAHA will take all necessary steps against any form of retaliation suffered by personnel or other persons reporting possible breaches of this Policy.
- Reports of child abuse and exploitation or violence against children committed by individuals who are not VAHA personnel and that are not committed in the context of VAHA activities should be reported to the police authorities: personnel doing so should be aware of the potential consequences of doing so, including for the safety of children, and should discuss with their line manager and/or Human resource officers, as appropriate.

4.3 Review of allegations

- Any allegations of abuse and/or exploitation of children by personnel acting on behalf of VAHA will be examined against standards established by the Code of Conduct, this Policy and relevant national legislation.
- VAHA is committed to ensuring that the safety and wellbeing of children and their dignity and rights remain the overriding concern at all times; as a result, the risks incurred by children will be assessed by the Human Resources Department whenever it considers launching a disciplinary process and these risks will be monitored until that process is over.

If necessary, a plan of action to protect the child or children concerned will be established by the Human Resources Department. Such a plan of action will include the following elements:

- Report the matter to local police and/or the child protection authority whether or not required by law; and/or
- Ensure referral and support for the child (in terms of safety, health, psychological support, etc.); and/or Manage internally in accordance with the processes mentioned below if not a criminal matter.
- Any act of child exploitation and/or abuse will be considered by VAHA with the highest degree of severity. Any act of exploitation or abuse should lead to disciplinary measures and should lead to the termination of the contract between the personnel and VAHA, in accordance with the relevant legal framework (including, for example, global Staff Regulations and the National Code of Conduct, for Employees).
- All reports made in good faith will be viewed as being made in the best interests of the child regardless of the outcomes of any investigation. A personnel who intentionally makes a false or malicious report may be subject to disciplinary action. A contractor who intentionally makes a false or malicious report may be subject to termination of contract.

4. Standards for acceptable/unacceptable behavior in relation to children

In addition to the rules mentioned in the Code of Conduct, personnel must abide by the following standards concerning VAHA programs or activities involving children:

- All activities involving children are supervised by personnel, in particular same-sex personnel if this enhances the protection of children. The number and gender-balance of personnel will be determined according to the sex, age and capacity of the children, and should always be sufficient with the necessary skills and qualifications consistent with the scope of work / role expected. Wherever possible, more than one adult should be present when working in the proximity of children;
- No activity or programme is undertaken with children without the express written permission of their parents / guardians, or relevant authorities for street/unaccompanied children;
- Where VAHA arranges for visits, no child should be left unsupervised with a visitor to a programme or event;
- In general, personnel are not allowed to work alone with a child somewhere that is secluded or where they cannot be observed. It is acceptable for personnel to work alone with a child where there are visibility panels / windows in doors. Efforts will be made to ensure that the lone personnel is the same sex as the child if this is considered to enhance the protection of the child in a given situation;

- Personnel should not invite unaccompanied children into the personnel's home, unless they are at immediate risk of injury or in physical danger and, in this case, the personnel involved should advise their supervisor of the need for such action;
- Personnel should not sleep close to unsupervised children unless absolutely necessary, in which case the personnel must obtain his/her supervisor's permission, and ensure that another adult is present, if possible the child's parent or guardian. In all cases, the personnel should be the same sex as the child/children;
- Personnel must use any computers, mobile phones, video cameras, cameras or social media appropriately, and never to exploit or harass children or access child exploitation material through any medium;
- Personnel must not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
- Personnel must not use physical punishment on any part of the body of the child;
- Personnel must comply with all relevant national labour laws in relation to child labour;
- Personnel must not hire children for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury;
- Personnel must immediately report concerns or allegations of child exploitation and abuse and Policy non-compliance in accordance with appropriate procedures and laws of the country;
- Personnel must immediately disclose all charges, convictions and other outcomes of an offence, which occurred before or occurs during their association with VAHA that relate to child exploitation and abuse;
- When photographing or filming a child or using children's images for work-related purposes, the personnel must:
 - obtain informed consent from the child and parent or guardian of the child before photographing or filming a child. As part of this, the personnel must explain how the photograph or film will be used;
 - assess and endeavor to comply with local traditions or restrictions for reproducing personal images before photographing or filming a child;
 - ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive;
 - ensure images are honest representations of the context and the facts;
 - ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.

5. Standards expected from contractors, suppliers and partners

VAHA expects its contractors, donors and partners to:

- Formally acknowledge and comply with the key principles of this Policy described above;
- Take immediate action, should the partner or contractor have reason to believe that an employee or any of their activities might be in breach of the above-mentioned key principles;
- Immediately notify the VAHA if any VAHA-funded personnel are accused of, charged with, arrested for, or convicted of criminal offences relating to child exploitation and abuse;
- Accept that any contract or agreement between VAHA and that contractor or partner might be terminated, should there be a serious or repeated breach(es) of the abovementioned key principles, and/or a failure to take appropriate action when a breach of these key principles is discovered;
- Accept that VAHA may raise with the contractor or partner issues of compliance with these key principles by the latter, including through VAHA-requested audits or other measures to investigate compliance;
- Ensure best efforts to promote and enhance child protection amongst its personnel.
- The relevant provisions required for the implementation of the above obligations will be inserted in the relevant templates of contracts and agreements.
- As part of its standard Terms and Conditions, VAHA expects the following from its suppliers and companies providing services:
 - Not to be subject to a judgment that has force of Res Judicata for fraud, corruption, involvement in a criminal organization or any other illegal activity;
 - To guarantee respect of fundamental rights and not to be complicit in human rights abuses, including violence against children;
 - Not to exploit child labour and forced labour and respect the basic social rights and working conditions in the countries involved.

6. Roles and Responsibilities

Accountable	Activity
Secretary general	Ensure that VAHA work protects children. Review and approve the policy. Hold managers accountable to this policy and promote policy principles as appropriate.
Director of human resource department	Ensure VAHA human resource management policies and practices protect children and that training is provided to all staff. Ensure there is periodic monitoring and tracking of compliance and implementation of the policy
managers	Promote awareness and understanding of the policy among VAHA personnel Ensure personnel have the knowledge, skills

	and attitude necessary for their positions to support child protection. Ensure personnel are held accountable to the policy Incorporate consideration of this policy in planning, budgeting and resource allocation
All personnel	understand, advocate and apply the policy to their work

7. Review of this Policy

This policy is subject to regular review- at least every 5 years or earlier if need be.

8. Abbreviations /acronyms

Abbreviation	Meaning	
VAHA	Value Health Africa	
UNCRC	United Nations convention on the Rights of the Child	

9. Related documents

- VAHA's Code of conduct
- Staff regulation

Annex 1 – Definitions

1. ‘Adult’ a human being aged 18 years or more
2. ‘Child’ a human being under the age of 18 years
3. ‘Child abuse’ one or more of the following³ : · physical abuse · sexual abuse · emotional abuse · neglect · exploitation · bullying · harassment
4. ‘Child abuse material’, material that depicts (expressly or implicitly) a child as a victim of torture, cruelty or physical abuse.
5. ‘Child exploitation and abuse’ one or more of the following: · committing or coercing another person to commit an act or acts of abuse against a child · possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material · committing or coercing another person to commit an act or acts of grooming or online grooming
6. ‘Child exploitation material’ material, irrespective of its form, which is child abuse material or child pornography material
7. ‘Child pornography’ (also known as “child abuse images”) any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes
8. ‘Child pornography material’ material that depicts a person, or is a representation of a person, who is, or appears to be, under 18 years of age and is engaged in, or appears to be engaged in, a sexual pose or sexual activity, or is in the presence of a person who is engaged in a sexual pose or activity, and does that in a way that a reasonable person would regard as being, in all the circumstances, offensive
9. ‘Child protection’ an activity or initiative for the purpose of preventing or responding to a specific incident of child abuse
10. ‘Child-safe practices’ activities and measures which are taken to protect children from all types of violence, exploitation and abuse. Their design and implementation require an awareness of behaviours and activities that can be harmful to a child, and knowledge of protective behaviours that prevent all risks of child exploitation and abuse.
11. ‘Contact with children’ working or participating in an activity or in a position that involves contact, including online, with children, either under the position description or due to the nature of the work environment.
12. ‘Code of Conduct’ the Code defining the duties and obligations of all VAHA Staff, including Employees, and all individuals working under VAHA name and legal status
13. ‘Contractor’ any person or organisation working jointly with or providing services to VAHA, including consultants and partner organisations
14. ‘Emotional abuse’, a parent’s or caregiver’s inappropriate verbal or symbolic acts towards a child or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability whereby a child’s self esteem and social competence is damaged
15. ‘Employee’ as a sub-category of VAHA Staff, any person having concluded an Employment Contract with VAHA, whose Contract is not governed by any national labour law and which, by decision of VAHA, fall under the jurisdiction of the ILOAT

16. 'Grooming;' behaviour that makes it easier for an offender to procure a child for sexual activity (including online grooming)
17. 'Online grooming' the act of sending an electronic message with indecent content to a recipient who the sender believes to be under 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
18. 'Neglect' the failure by a parent or caregiver 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
19. 'Partner' any organisation with which VAHA is carrying out joint work or to VAHA is providing funds to carry out work
20. 'Personnel' any individual contracted by VAHA, whatever his/her legal status (Employee, local staff, consultant, intern, volunteer...)
21. 'Physical abuse' the use of physical force against a child that results in harm to the child. Physically abusive behaviour includes shoving, punching, hitting, beating, kicking, biting, burning, shaking, throwing, strangling and poisoning
22. 'Sexual abuse' the use of a child for sexual gratification by an adult or a significantly older child or adolescent. Sexually abusive behaviours can include fondling genitals, masturbation, oral sex, vaginal or anal penetration by a penis, finger or any other object, fondling breasts, voyeurism, exhibitionism and exposing the child to, or involving the child in, pornography
23. 'Staff' any person in the service of the VAHA, including VAHA Contracted staff (Employees and National Staff) and Staff-on-Loan, to the exclusion of volunteers, interns and consultants

Annex 2 – Key provisions of VAHA of Conduct related to child protection

According to VAHA Code of Conduct (2016) and reviewed this 2020, the following rules apply to all personnel bound by that Code, and they state that the latter must:

- Comply with the applicable laws of the country in which they are present, including the organization’s applicable status or headquarters agreements. (Rule 1)
- In case of violation of any applicable law, the organization may not provide any legal assistance to the individual and may waive any immunities enjoyed by him/her” (Rule 2).
- Respect all persons equally and without any distinction or discrimination based on nationality, race, gender, religious beliefs, class or political opinions; and act at all times in accordance with the Fundamental Principles and the humanitarian and organisational values as defined by the organization. These are: respect for diversity, cultures, structures and customs of the communities, solidarity with the community, integrity and accountability, as well as mutual understanding and non-discrimination are essential elements to preserve human dignity (Rule 3).
- Take into account the sensitivities of peoples’ customs, habits, and religious beliefs and avoid any behaviour that is not appropriate in a particular cultural context (Rule 4) .
- Abstain from all acts which could be considered harassment, abuse, discrimination or exploitation (refer to Anti-harassment guidelines). This applies to all people of all ages, especially to children and to people exposed to stigma, including those living (Rule 6).
- Not act in any way likely to bring the organization into disrepute (Rule 13).
- Not commit any act of sexual exploitation, sexual abuse or sexual violence. This prohibition extends to all forms of sexual abuse or exploitation and includes not reporting concerns or suspicions regarding any violation by a co-worker (whether fellow Staff or an individual working for a partner organisation) (Rule 17).
- Not engage in any sexual activity with persons (adult or child) that look to or benefit from the organization’s protection or assistance, or with any persons under the age of 18 years, regardless of the age of majority or consent locally (mistaken belief in the age of a child is not a defence). Sexual activity includes all forms of activity and abuse of a sexual nature, with or without physical contact and whether or not either party is aware of such abuse (Rule 18).
- Not exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This prohibition extends to any use of sex trade workers. (Rule 19).
- Not produce, procure, distribute or use pornographic material in organization offices or on Federation equipment, including reading/surfing pornographic websites or message boards or sending pornographic emails (Rule 20).

Annex 3 – Conventions and obligations

VAHA is committed to act in accordance with the standards set out by international legislation and conventions relating to child rights and protection. VAHA is also obliged to abide by national laws relevant to child protection. The international treaties and standards include:

The United Nations Convention on the Rights of the Child (UNCRC), 1989

This is the most significant international instrument that specifically addresses Child Protection. The four main principles of the UNCRC are:

1. The right of all children to survival and development
2. Best interests of the child as a primary consideration in all decisions relating to children
3. The right of all children to express their views freely
4. Non-discrimination

Other guiding conventions and legislations

- Optional Protocol to the United Nations Convention on the Rights of the Child on the sale of children, child prostitution and child pornography, 2000
- International Labour Organisation Convention 182: the Worst Forms of Child Labour , 1999.
- Universal Declaration of Human Rights, 1948
- Geneva Conventions on the Protection of victims of War, 1949; Additional Protocols, 1977 o International Covenant on Economic, Social and Cultural Rights, 1966 o International Covenant on Civil and Political Rights, 1966 (and Optional Protocol)
- Convention on the Elimination of all Forms of Discrimination,1979 o Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children, supplementing the UN Convention against Trans-national Organized Crime, 2000
- A World Fit for Children, Special Session of the United Nations General Assembly, 2002 o Convention on the Rights of Persons with Disabilities, 2007
- The Fundamental Principle of Humanity, 1965 This Principle states that the Red Cross / Red Crescent will “endeavour to alleviate human suffering wherever it may be found” and “protect life and health and ensure respect for the human being”.
- International Federation of Red Cross Red Crescent Societies Strategy on Violence Prevention, Mitigation and Response In the area of violence prevention recognises children and youth are disproportionately affected by violence, discrimination and exclusion and therefore need to become the focus of attention and action.
- Red Cross Red Crescent Societies Pledge 101 (30th International Conference of the Red Cross and Red Crescent, Geneva, 2007) Supports National Societies to adopt and implement a zero-tolerance approach towards sexual exploitation and abuse, assisting them to promote safe environments for children in the workplaces while raising awareness on the same.
- IFRC Restoring Family Links – Unaccompanied Child Guidelines

Annex 4 – Commitment by contractors and partners

The partner hereby:

- Formally acknowledges and complies with the key principles described in Sections 3 of this document.
- Commits to take immediate action, should the partner have reason to believe that an employee or any of their activities might be in breach of the above-mentioned key principles;
- Commits to immediately notify VAHA if any VAHA-funded personnel, or any of its other personnel, are accused of, charged with, arrested for, or convicted of criminal offences relating to child exploitation and abuse;
- Accepts that any contract or agreement between VAHA and that contractor or partner might be terminated, should there be a serious or repeated breach(es) of the abovementioned key principles, or a failure to take appropriate action when a breach of these key principles is discovered;
- Accepts that VAHA may raise with the contractor or partner issues of compliance with these key principles by the latter, including through VAHA-requested audits or other measures to investigate compliance;
- Ensures best efforts to promote and enhance child protection amongst its personnel.

Annex 5– Statutory declaration by personnel

I, undersigned, hereby confirm that to the best of my knowledge I have not been convicted of, am not currently suspected of, or am not being prosecuted for any offence involving any type of harm to a child or children in any country. I declare that there is no element which could affect my suitability to work with children, and that I am aware of the seriousness of this declaration and that any erroneous declaration may be considered as gross misconduct.

**ANTI-SEXUAL
EXPLOITATION AND
ABUSE/SEXUAL
HARASSMENT POLICIES**

1. BACKGROUND

1.1 Introduction

Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) are unacceptable breaches of fundamental human rights and a deep betrayal of VAHA's core values. The sexual exploitation and abuse of those who depend on VAHA for assistance runs counter to all our organizational values. It is unconscionable, it is intolerable, and it is often criminal. Equally intolerable is the sexual harassment of our fellow aid workers.

Working closely with partners and communities, VAHA strongly upholds prevention of SEA at the forefront of all its activities. This work is informed by, and taking place in tandem with, the work of related actors including the broader UN system, donors, and civil society organizations.

1.2 Purpose and Scope

Recognising the difference between the two, this Strategy covers both SEA and SH, bringing them together in a way that is mutually reinforcing and that creates opportunities to leverage practices between the two. The Strategy also acknowledges the complexity and limitation to VAHA's authority in relation to SEA perpetrated by implementing partner personnel, including Government personnel. However, it does include measures to address and prevent these violations including supporting partners to fully integrate PSEA into national programmes in both development and humanitarian contexts, creating a joined-up accountability culture that abhors, sanctions and prevents SEA and protects victims. This document presents VAHA's vision and policies for preventing and responding to both SEA and SH and sets out concrete strategies and interventions for creating and maintaining a safe and respectful environment for the people VAHA serves and for VAHA staff and related personnel especially women. This includes VAHA staff members, consultants, individual contractors, volunteers, interns, experts on mission, individuals, or persons working for VAHA through an employment agency.

Key definitions

Sexual Exploitation and Abuse (SEA): is the abuse or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes or the actual or threatened physical intrusion of a sexual nature by VAHA's personnel, their implementing partners or other aid workers, against the people they serve.

Sexual Harassment (SH): is any unwelcome conduct of a sexual nature when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment by VAHA's personnel against each other, or against any other individual they are serving.

2. VISION and GOAL

2.1 Vision

Achieving the right of individuals and communities that VAHA and its partners serve to access the protection and assistance they need without fear of sexual exploitation and abuse; the right of VAHA staff members especially women and related personnel to feel supported, respected and empowered to deliver assistance in an environment free from sexual harassment; and the right of survivors of SEA and SH to access timely and confidential investigation and effective and safe assistance and support.

2.2 Goals

- An organizational culture of zero tolerance for SEA/SH: Create and nurture an organisational culture based on Accountability where there is a zero tolerance for SEA and SH, where rights are recognized, promoted and protected and where violations are actively prevented.
- Reporting mechanisms that are safe and trusted: Empower and support individuals, communities, VAHA personnel and partners to feel safe to report violations and to feel safe that reports will be handled in a manner that respects due process and other human rights.
- Swift and Credible Investigation and Sanctions: Ensure a fair process for swift and credible investigations and sanctions for violations by VAHA personnel, and actively promote swift and fair investigations and sanctions by (as appropriate) Government partners, implementing partners and commercial vendors.
- Survivor-Centred Response: Provide survivor-centred assistance and support that is timely, predictable, sustainable and adequately resourced.
- Engaging Partners in the fight against SEA and SH: Engage and equip individuals, communities, personnel and implementing partners as allies in preventing and responding to sexual exploitation and abuse and sexual harassment.

2.3. Guiding Principles

The following principles underpin and inform VAHA's strategy:

- The children, women, men and communities that VAHA serves have the right to be treated with dignity and respect and to receive assistance without threat of exploitation and abuse;
- VAHA has zero tolerance for SEA and SH. As such, it has a responsibility to create and maintain an environment that prevents sexual exploitation and abuse and a responsibility to provide timely, confidential, and effective investigation, assistance and support to survivors;
- All VAHA personnel have the right to work in an environment free from sexual harassment;
- All VAHA personnel are expected to act with tolerance, sensitivity and respect for diversity. They have the obligation to ensure that they do not engage in, condone or tolerate behaviour that would constitute sexual harassment.

2.4. Values

VAHA's core values are central to how it prevents and responds to SEA and SH:

- **Care:** The children, women, men and communities that VAHA serves, and those who serve them, will be treated with care, sensitivity and dignity;
- **Respect:** All VAHA personnel are expected to act with respect and tolerance;
- **Integrity:** All VAHA personnel demonstrate integrity through honest, principled, fair, and ethical behaviour;
- **Trust:** VAHA and its personnel will demonstrate and inspire integrity, ability and confidence among communities, partners and between each other.
- **Accountability:** VAHA and its personnel have an obligation to account for organisational and personal behaviour and accept responsibility for their conduct in a transparent manner.

3. STRATEGIC FOCUS

3.1 An Organisational Culture of zero tolerance built through Accountability, Prevention and Gender Equality

a) Accountability

VAHA will use power responsibly by taking account of, giving account to, and being held to account by the people it seeks to assist. This accountability will drive all VAHA actions on SEA and SH and will operate on three levels:

- **Individual Accountability:** All VAHA personnel are accountable for regulating their conduct at all times in a manner befitting their status as national civil servants, including in their private lives when not at work. They are expected to support an organisational culture of care, respect, integrity, trust and accountability that deters violations.

- **Leadership Accountability:** The Executive Director together with Senior Management are accountable for setting the tone from the top and guiding the organisation in preventing and responding to SEA and SH in all contexts. They will prioritise the resourcing of programmes, teams and structures to enable effective prevention and response measures to be rolled out. They will lead in creating an organisational culture of zero tolerance based on care, respect, integrity, trust and accountability.
- **Organisational Accountability:** VAHA as an organisation is accountable to act on complaints – that is, to provide support to survivors; to conduct impartial and confidential investigations; to apply sanctions within the scope of VAHA’s authority; to cooperate with national legal systems as appropriate so as to help secure fair recourse. While the accountability for violations by personnel of implementing partners rests with those entities, VAHA has an organisational accountability to work closely with partners to manage shared risks, address common challenges.

b) Prevention and Deterrence

VAHA will continue to strengthen an organisational culture of prevention and deterrence. This will start at the high-level leadership, where prevention is to be actively promoted through openness, where speaking up. As a measure to strengthen prevention, PSEA and SH will be included as core elements of the organisation’s enterprise risk management approach. Every department will be required to identify SEA and SH risks and to define and implement mitigation measures as part of their risk management plans.

c) Gender Equality

Sexual exploitation and abuse and sexual harassment become possible when there are imbalances of power and opportunities for exploiting such imbalances. In many of the contexts where VAHA works, there is a deep imbalance of power based on gender - some are more likely to have control of resources, and others are more likely to be dependent on those for their access to resources and services. VAHA is firm on promoting gender equality across the organization’s work including the gender dimensions of its programmatic results, as well as the steps to strengthen gender across change strategies and institutional systems and processes.

3.2 Reporting Mechanisms that are Safe and Trusted

Recognising that reporting procedures in cases of SEA and SH are very different, VAHA will create an environment where, in both situations, individuals, communities, VAHA personnel and partners feel safe to report violations and trust that immediate and decisive action will be taken against perpetrators. In cases of SEA, complaint mechanisms will be safe, gender-sensitive, and appropriate to the context. They will be developed in consultation with affected communities, particularly those most vulnerable, and linked to services for survivors. A SEA risk assessment

and a contextualized needs assessment will inform the development of new complaint channels and reinforce existing channels.

Confidentiality interests and the interests of survivors will be considered before and during all cases. Anonymous complaints will be accepted through multiple channels.

3.3. Investigations and Sanctions that are Swift and Credible

VAHA's investigation function will be strengthened to ensure timely, impartial, independent and fair investigations for SEA and SH. VAHA will take all measures to build trust for its investigation function, including, where appropriate, engaging independent third-parties with experience in the global workplace to receive reports of sexual harassment through channels appropriate for various locations and to conduct investigations within the framework and authority of VAHA's overall investigative function.

Perpetrators will be held accountable for their actions. VAHA will take appropriate action against those who choose not to respect our standards of conduct, including the systematic use of sanctions as a means of addressing impunity. The Executive Director will engage with other heads of Agencies and with the national Coordinator in a collective effort to strengthen sanctions with due respect to feasibility, legality, due process rights of alleged perpetrators, and effectiveness of such sanctions. Communication and awareness raising among partners and VAHA personnel on the consequences of violations will be integrated into internal and external communication strategies as a key deterrent measure.

3.4 A Quality Response that is Survivor-Centered

VAHA is committed to ensuring every child and adult survivor of SEA and SH has access to quality, survivor-centered assistance and support in line with their needs, including medical care, psychosocial support, legal assistance, and reintegration support.

For SEA, VAHA will work with national legal institutions and contribute to guiding the consistent delivery of this assistance. VAHA supports the role of Victims' Rights Advocates to promote and ensure the rights of victims of SEA committed under the VAHA banner, and advocate for a victim-centered approach across the national systems. VAHA will continue to work with other stakeholders for transparency and accountability, including legal recourse for SEA. For SH, VAHA is equally committed to providing comprehensive support and assistance to staff who experience sexual harassment including confidential ethical advice and guidance; protection from retaliation; counselling; mediation or alternative dispute resolution; medical services; and security support.

3.5 Engaging Partners in the fight against SEA and SH

Individuals, communities, staff and partners, including government partners, will be engaged more directly and better equipped as allies in prevention & response. For PSEA, community

outreach, consultation, mobilization and awareness raising in communities that receive VAHA's assistance, particularly in high-risk environments, will be integrated into existing community consultation approaches as a trust building and prevention measure. This includes the sharing of PSEA principles and codes of conduct (including what will be done in response to any complaint) in accessible formats (simplified texts, picture messages, audio recordings, graphics or videos) and languages and dissemination through multiple channels.

4. OPERATIONALISATION

4.1 Leaders as Champions

VAHA leadership, from the Executive Director through Senior Management at headquarters, regions, will be equipped to champion prevention, an organisational culture of trust, and workplace practices that reinforce individual and organisational accountability. Leadership and management practices in VAHA will be grounded in the code of conduct.

4.2 Internal and External Coordination and Collaboration

Successful implementation of the Strategy relies on strong coordination and cooperation at various levels:

- i) across all parts of VAHA in all locations;
- ii) between VAHA and other organizations;
- iii) in the field between communities.

4.3 Communication

Clear, timely and open communication is a key enabler of this strategy. A dedicated and tailored internal and external communication strategy will frame communication efforts. The strategy will take account of the various contexts in which VAHA operates.

4.4 Normative and Regulatory instruments

VAHA will establish clear and accessible normative and regulatory instruments that will guide the operationalization of this policy. These will include a coherent and complementary set of roles and procedures; an accountability framework that sets out roles and responsibilities at every level; a monitoring and evaluation framework with tangible benchmarks for measuring progress on implementation of the strategy; and a resourcing and capacity building strategy without which progress will not be possible.

ANNEX ONE: Definitions

The following definitions have been adopted by the United Nations System and are common across all United Nations System organizations:

- a) Sexual Exploitation: 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.
- b) Sexual abuse: the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- c) Sexual harassment: Sexual harassment is any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. Sexual harassment may occur in the workplace or in connection with work. While typically involving a pattern of conduct, sexual harassment may take the form of a single incident. In assessing the reasonableness of expectations or perceptions, the perspective of the person who is the target of the conduct shall be considered.