



## Policy on Prevention of Sexual Exploitation and Abuse (PSEA)

### Introduction

International Blue Cross (IBC) has a mission to prevent, treat and reduce substance use, abuse and dependency among the most vulnerable people around the world. Headquartered in Bern Switzerland, IBC is an international actor in the field of development cooperation and serves as the umbrella organization for its national member organizations. IBC has no regional offices but works with in-country partners.

The members are independent, non-political and non-denominational Christian associations that form a network to assist marginalised populations and people harmed by, or at risk to be harmed by, alcohol and drugs.

As a global organisation, IBC also implements international development cooperation programmes in the field of substance abuse in line with the United Nations 2030 Agenda. Project activities are run in grass roots settings in various locations and include alcohol and drug prevention, treatment and counselling for people with substance abuse problems, as well as international policy advice and lobbying.

The six core values of the International Blue Cross are Liberating Spirituality, Excellence, Empowerment, Solidarity, Respect, and Inclusiveness.

### Purpose

This policy sets out IBC approach to preventing sexual exploitation and abuse (PSEA). It sets out the principles upon which we will base our decision making and actions, our expectations of all who represent IBC and our commitments to ensure that effective action is taken when problems occur. All staff and contracted parties will be familiar with this policy and sign their commitment to it.

IBC is committed to services where all people have a right to live their lives free from sexual harassment and abuse, sexual violence, bullying, exploitation and any abuse of power regardless of age, gender, sexuality, disability, religion or ethnic origin. IBC will not tolerate its employees, volunteers, consultants, partners or any other representatives associated with the delivery of its work carrying out any form of sexual harassment, abuse or exploitation. Such behaviour goes against the very beliefs, values and mission of our organisation. Safeguarding is a priority for IBC. Sexual harassment, violence, exploitation and abuse, as well as a range of non-sexual abuses of power, take various forms and can happen to anybody at any time during their lives, but are more likely when one person is in a position of power over another.



IBC recognises that this can happen in workplaces and that organisations working with vulnerable populations face an inherent risk of some staff exploiting positions of power. In order to tackle such risks this Policy will be used in conjunction with employment/labour, duty of care and relevant criminal laws to make decisions about how to respond to complaints and concerns raised by staff, volunteers and other representatives.

## Objectives

IBC commits to the most widely used standards with regard to PSEA, specifically the IASC (Inter-Agency Standing Committee) Minimum Operating Standards for Protection from Sexual Exploitation and Abuse for UN and non-UN staff and these standards apply to all staff, volunteers and contracted parties. The term 'humanitarian workers' covers all these categories:

*"We further recall that creating and maintaining a living and working environment that prevents sexual exploitation and abuse is both an individual and organizational responsibility. We note that the management culture of an organization, the representation of women and men at all levels of the organization and the adequacy of the living and working environment all contribute to the prevention of sexual exploitation and abuse."*

1. "Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Sexual relationships between humanitarian workers and beneficiaries are strongly discouraged since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of humanitarian aid work.
5. Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
6. Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment."





## Areas of Application

In IBC activities, IBC will develop a strategy on how to achieve values for respect, diversity and inclusion. IBC follows best practice on PSEA and refers to the core humanitarian standard PSEA handbook <https://www.chsalliance.org/files/files/PSEA%20Handbook.pdf> to support the application of this policy among the following areas:

### IBC contracted partners and support recipients

- Work with our contracted partners to design and adapt our services to eliminate sexual exploitation and abuse wherever possible.
- Partners are responsible to developing the local complaint mechanisms and inform beneficiaries of IBC complaints procedure and opportunities for raising concerns and complaints.
- Provide basic emergency assistance to complainants of sexual exploitation and abuse.
- Encourage reporting of all concerns.
- Partners, suppliers and contractors are assessed for their contact with beneficiaries, and capacity to implement PSEA measures.
- Clauses on PSEA are included in all contract agreements.
- PSEA training is delivered to partners, suppliers and contractors (particularly where these organisations will have contact with beneficiaries).
- PSEA measures, and SEA cases, in partner, supplier and contractor organisations are monitored.
- Potential risks of sexual exploitation and abuse presented by programmes and projects are identified and addressed.
- Project plans include activities on PSEA awareness and sensitivity.
- Budgets include funding lines for capacity building and communications on PSEA.
- Encourage the use of PSEA implementation quick reference handbook <https://www.chsalliance.org/files/files/PSEA%20Handbook.pdf>.

### IBC employees and volunteers

- Adopt employment policies and practices that reinforce our vision and promote IBC as an exemplar with an inclusive and engaged culture that considers protection from sexual exploitation and abuse.
- Recruit, train and develop employees and volunteers on merit and sign code of conduct and employment contracts that include commitment to PSEA policy.
- Ensure that complaint mechanisms for reporting sexual exploitation and abuse are accessible. Where a complaint is substantiated in whole or in part, appropriate disciplinary action will be taken.
- All staff, volunteers and associated personnel sign the organisation's code of conduct which includes PSEA.
- All staff and volunteers receive induction and (where relevant) bi- annual refresher training on PSEA.



- Staff members are aware of their obligation to report sexual exploitation and abuse and are aware that there is a policy for protection from retaliation as explained in this policy.
- Supervision and performance appraisals include adherence to code of conduct and participation in trainings.
- Encourage the use of PSEA implementation quick reference handbook <https://www.chsalliance.org/files/files/PSEA%20Handbook.pdf>.

### **IBC members and donors**

- Work with our donors and members so that we have a consistent approach to the issue of sexual exploitation and abuse.
- IBC will inform all their independent member organisations of IBC PSEA policy.
- All IBC arranged member organisation and donor events require participant commitment to adhering to this policy.

### **The community**

- Cooperate and work with relevant partners to help promote social, environmental and economic well-being in a cohesive and inclusive manner and provide structures for handling feedback and complaints.
- Communities IBC works with are fully aware of the expected behavior of the organisation's staff, including organisational commitments made on the prevention of sexual exploitation and abuse.
- Communities we work with know how to complain if these commitments are not met.
- Appropriate awareness-raising tools and approaches are used with communities, which are relevant to age, language and capacity.

### **Complaints Procedure**

IBC seeks to provide a safe environment through which stakeholders can voice a concern, without fear of reprisal or unfair treatment (Non-retaliation/ whistleblowing principle). These instructions will apply to the handling of complaints unless they are in conflict with compulsory Swiss legislation in which case IBC complies with mandatory legislation. The Swiss law supplements the complaint procedure as necessary for handling the complaint. Complaints can be made in **English or in French** by filling in an online form, by e-mail, phone, in person, or by post. IBC website contains details of how to complain, including a sample complaints letter format. IBC implements a fast-track process for dealing with complaints about SEA and other gross misconduct issues.

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Complaints  
Lindenrain 5a  
3012 Bern, Switzerland



Tel.: +41 31 301 9804

Email: [complaints@internationalbluecross.org](mailto:complaints@internationalbluecross.org)

[www.internationalbluecross.org](http://www.internationalbluecross.org)

The complainant shall receive confirmation of receipt of the complaint, within 5 working days after IBC receives the complaint. The email, letter or phone call should give the following information:

- when and how the complaint was received;
- how the IBC has responded to the complaint so far and what it will do next;
- the name of the focal point or person responsible for the complaint;
- the person to contact with questions or feedback.

IBC is committed to responding to all complaints and concerns of abuse in **English or in French**. IBC has responsibility for this work, and carries out investigations, and delivers support to survivors of and victims according to the [IBC complaints policy](#). IBC will communicate the preliminary outcome of an investigation to the complainant(s), where possible, within 60 days after acknowledgment of the complaint. In complex or exceptional cases, the investigation period may take longer.

Any investigation may result in disciplinary hearings and disciplinary action. Thereby, IBC applies the disciplinary guidelines of ACAS (Advisory, Conciliation and Arbitration Service) and the national employment law. Allegation of gross misconduct will result to immediate suspension of this person from work until investigation is concluded. Gross misconduct includes issues such as corruption, sexual or any other form of exploitation, violence, abuse and criminal acts (<http://www.acas.org.uk/media/pdf/f/m/Acas-Code-of-Practice-1-on-disciplinary-and-grievance-procedures.pdf>).

If the complainant(s) or Subject(s) of Complaint does not accept the outcome of the investigation, he/she/it/they can appeal the decision to the Network Committee (NC) using the IBC Complaints procedure as explained above. For a more detailed overview of the good practice on handling complaints we adapt the [ACT Alliance Complaints Procedure \(2016\)](#). Its guidelines are the basis for our process (<https://actalliance.org/wp-content/uploads/2015/11/Complaints-and-Investigation-Guidelines-July-2010-1.pdf>). As further support of the investigation of PSEA, IBC refers to Core Humanitarian Standard (CHS) Alliance handbook Guidelines for Investigation ([https://www.chsalliance.org/files/files/Investigation-Guidelines-2015\\_English.pdf](https://www.chsalliance.org/files/files/Investigation-Guidelines-2015_English.pdf)).

## Responsibilities

The Network Committee (NC) is the driving force behind this policy and they are informed of all logged complaints without confidential details. NC provides the secretariat with the assistance to drive the IBC strategy, statutes and vision.



All IBC employees are responsible for upholding, respecting and acting in accordance with this policy and two-yearly signing that they have updated their knowledge on the topic.

Management provides direction, training and support to ensure employees and contracted partners understand their responsibilities and can apply this policy in their areas of work. The **Code of Conduct** states that it is the duty and the responsibility of all managers, employees and IBC representatives **to report** in line with this policy any suspicions or incidences of inappropriate behavior. IBC arranges case-by-case support for victims. Victims have access to medical and psychological support. **Survivors and victims** can choose if and when they would like to take up the support options available to them.

### Policy Review

This policy will be reviewed every 4 years or as necessary. IBC will review the operation of this policy in consultation with the NC, employees and other stakeholders, where appropriate, in light of changing best practice and the law, amending the policy where required. IBC will take into account any lessons learned from handling complaints and will take into consideration any received feedback. IBC secretariat staff is responsible for the effective implementation of this policy in all IBC work.

Date Approved: December 10<sup>th</sup> 2018

Signed

A handwritten signature in black ink, appearing to read "Albert Moukolo".

Albert Moukolo  
President IBC

A handwritten signature in blue ink, appearing to read "Anne Babb".

Anne Babb  
General Secretary IBC