



Protection from Sexual Exploitation and Abuse (PSEA) Policy

A Working Manual



A working manual on Protection from Sexual Exploitation and Abuse (PSEA) of the organization WADS Foundation to safeguard the employees and staff working in it.

WORKING FOR ALTERNATE DEVELOPMENT SOLUTIONS (WADS) FOUNDATION

www.wadsfoundation.org

Background

WADS Foundation has been established to support local innovations, actions and approaches to development initiatives bringing a sustainable and qualitative improvement in the lives of the people.

The organization envisages an equitable society engaging the participation and voice from all sections of people.

Mandate of the Organization

The mandate of the organization is to work for the upliftment of the children, women, poor, marginalized and weaker sections of the society in urban and rural areas across the country. The organization imbibes strong cultural values, ethics and integrity for every work taken up by it. The organization also maintains a zero tolerance with regards to work exploitation, sexual harassment & exploitation, abuse and financial anomalies and non-integrity in work culture and environment.

Definitions

A. Child and vulnerable adults

A child is any individual under the age of 18,

B. Vulnerable adults are defined as:

- Those aged over 18 years and who identify themselves as unable to take care of themselves/ protect themselves from harm or exploitation; or
- Who, due to their gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.

C. Physical Abuse

Physical abuse occurs when a person purposefully injures or threatens to injure a child or vulnerable adult. This may take the form of slapping, punching, shaking, kicking, burning, shoving or grabbing. The injury may take the form of bruises, cuts, burns or fractures.

4. Child Emotional Abuse

Emotional abuse is inappropriate verbal or symbolic acts toward a child or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child's self-esteem or social competence.

5. Neglect

Neglect is the failure to provide a child or vulnerable adult with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being.

6. Vulnerable Adult Abuse

A Vulnerable Adult is defined as someone "who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation". Vulnerable Adult Abuse can take many forms

7. Communities

The communities that WADS Foundation works with includes, communities in general, service providers, women, men, girls, boys, people with special needs, vulnerable adults and marginalized groups.

8. Staff

WADS Foundation **staff** refers to individuals who receive a regular salary or honorarium for work in any part of WADS Foundation, including all Offices, Field Offices, Headquarter and any other location where WADS Foundation operates.

9. Managers:

Refers to the staff who have responsibility for line managing or supervising the work of WADS Foundation staff.

10. Sexual Harassment:

Sexual Harassment is defined as: "Any unwelcome, sexually determined behaviour (whether directly or by implication) such as:

- Physical contact and advances;
- Demand or request for sexual favours, whether verbal, textual, graphic, electronic or by any other action;
- Sexually coloured remarks;
- Showing pornography; or
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

The following circumstances if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:

- implied or explicit promise of preferential treatment in employment; or
- implied or explicit threat of detrimental treatment in employment; or
- implied or explicit threat about present or future employment status; or
- interference with work or creating intimidating or offensive or hostile work environment; or
- Humiliating treatment likely to affect health and safety.

In addition, the following conduct construes Sexual Harassment

Verbal harassment

e.g., epithets, derogatory comments, slurs, kidding, teasing, jokes commenting about another's body or appearance, offensive sexual flirtations, sexual advances or propositions, gender based comments and ridicule, inquiries into one's sexual experiences, discussion of one's sexual activities, threats, insults, name calling, whistles or catcalls, sexually explicit or offensive language.

Physical harassment

e.g., assault, stalking, staring, trick or horse play, impeding or blocking movement, physical contact such as patting, pinching, hugging or brushing against another's body.

Visual and nonverbal forms of harassment,

e.g., derogatory posters, sexually oriented cartoons or drawings, the display of sexually suggestive objects or pictures, such as calendars and screen savers, or demeaning graffiti, demeaning or sexually suggestive gestures.

1. Background & Safeguarding Framework:

All forms of sexual exploitation and abuse (SEA) are a violation of human rights and an abuse of a position of power over a vulnerable population that the United Nations and other humanitarian and development actors have pledged to protect. SEA can lead to serious, sometimes life-long, adverse consequences for the survivors, particularly child survivors. Furthermore, SEA undermines the integrity and reputation of the UN and other humanitarian and development actors and can threaten the security of their personnel and operations. This document is part of WADS Foundation Safeguarding Framework that consists of this policy, code of conduct, procedures and resources.

2. Policy Introduction:

WADS Foundation has a zero tolerance for sexual exploitation and abuse. WADS Foundation will not tolerate its staff, associates, partners or any other representatives associated with the delivery of its work to engage in any form of sexual exploitation or abuse. Vulnerable adults, women and children are particularly at risk of sexual exploitation and abuse.

WADS Foundation is committed to protecting all communities that the organization works with from sexual exploitation and abuse at all times.

The purpose of the PSEA Framework, including the policy, procedures and resources, is to establish an outline of the importance of the framework and clear procedures. The PSEA Framework also affirms WADS Foundation commitment to the United Nation's PESA Policy

This policy ensures that all the WADS Foundation staff, associates, and partners are aware of their role and responsibilities in keeping communities and stakeholders safe from any form of sexual exploitation or abuse. The policy clarifies definitions and responsibilities regarding prohibited behaviour and the associated PSEA procedures outline the reporting and investigation processes.

3. Accountability Statement

WADS Foundation takes this policy very seriously, and the mandate prohibiting any form of sexual exploitation and abuse comes from WADS Foundation Executive Committee and senior management.

The PSEA policy applies to all the WADS Foundation staff, associates, and partners who must comply with its requirements and understand the sanctions that may be applied for breaches of the policy. Where required by law or local practices, WADS Foundation may enhance the standards as set out in this policy. This commitment will be evidenced through signing the policy and the Code of Conduct. Training in this policy is mandatory for all WADS Foundation staff, associates, and partners.

The Executive Board of WADS Foundation is accountable for this policy. The Program Managers and Heads of different WADS Foundation offices are responsible for its implementation. It is the responsibility of all representatives of WADS Foundation to raise any concerns regarding sexual exploitation and abuse. WADS Foundation takes all concerns and complaints seriously and will initiate a comprehensive investigation of complaints that are in violation of this policy and take disciplinary and possibly legal action as warranted.

4. Policy Approach

This policy details how WADS Foundation achieves its obligations and applies to all staff, associates and partners regardless of their location.

5. Framework Principles

This policy and the entire Safeguarding Framework are guided by the following principles:

5. 1 Safeguarding

WADS Foundation is committed to all community members as having the right to safeguarding and protection from sexual exploitation and abuse irrespective of ability, ethnicity, faith, gender, sexuality, and culture. A key principle within this is that all processes are survivor led. WADS Foundation commits to survivors leading the complaint process where it is possible and appropriate to do so.

5.2 Code of Conduct

The Code of Conduct applies to any event, which shall include meetings, conferences and symposia, assemblies, receptions, scientific and technical events, expert meetings, workshops, exhibits, side events and any other forum organized, hosted or sponsored in

whole or part by the organization or its partners wherever it takes place, and any event or gathering that takes place is organizing, hosting or sponsoring.

5.2.1 PROHIBITED CONDUCT

Harassment is any improper or unwelcome conduct that might reasonably be expected or be perceived to cause offence or humiliation to another person. Harassment in any form because of gender, gender identity and expression, sexual orientation, physical ability, physical appearance, ethnicity, race, national origin, political affiliation, age, religion or any other reason is prohibited at WADS events.

Sexual harassment is a specific type of prohibited conduct. Sexual harassment is any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation. Sexual harassment may involve any conduct of a verbal, nonverbal or physical nature, including written and electronic communications, and may occur between persons of the same or different genders.

Examples of sexual harassment include, but are not limited to:

- Making derogatory or demeaning comments about someone's sexual orientation or gender identity
- Name-calling or using slurs with a gender/sexual connotation
- Making sexual comments about appearance, clothing or body parts
- Rating a person's sexuality
- Repeatedly asking a person for dates or asking for sex
- Staring in a sexually suggestive manner
- Unwelcome touching, including pinching, patting, rubbing or purposefully brushing up against a person
- Making inappropriate sexual gestures, such as pelvic thrusts
- Sharing sexual or lewd anecdotes or jokes
- Sending sexually suggestive communications in any format
- Sharing or displaying sexually inappropriate images or videos in any format
- Attempted or actual sexual assault, including rape

A participant who feels that they have been harassed at any event may report the matter to the organizer of the event or relevant security authority, and a participant who witnesses such harassment should make such a report. The organizer of the WADS event will be expected to take appropriate action in accordance with its applicable policies, regulations and rules.

Examples of appropriate action may include, but are not limited to:

- Undertaking a fact-finding exercise
- requesting the perpetrator to immediately stop the offending behavior
- suspending or terminating the perpetrator's access to the organization or event or refusing registration at future organization events, or both
- conveying the complaint to any investigative or disciplinary authority with jurisdiction over the person accused of harassment
- conveying a report to the employer or entity with jurisdiction over the person accused of harassment for appropriate follow-up action

The victim of alleged harassment may also seek help from other relevant authorities, such as the police, bearing in mind the applicable legal framework.

A participant should never knowingly make a false or misleading claim about prohibited conduct.

5.2.2 PROHIBITION OF RETALIATION

Threats, intimidation or any other form of retaliation against a participant who has made a complaint or provided information in support of a complaint are prohibited. The organization or other entity/partner responsible will take any reasonable appropriate action needed to prevent and respond to retaliation, in accordance with its applicable policy, regulations and rules.

5.3 Shared Responsibility

For the PSEA policies and practices to be effective in reducing the risks to beneficiaries and communities, all at WADS Foundation must share the responsibility for implementation and improvement.

5.3 Effective Communication

WADS Foundation effectively communicates with all staff, associates, and partners in simple and accessible language to create a positive and accessible culture where responsibilities for PSEA are clear.

5.4 Continuous Improvement

WADS Foundation provides assessment, reflection and feedback mechanisms to inform the organization of any improvements that can be made to policies and practices.

These mechanisms include regular incident reviews, as well as regular policy review and refresher training for staff and associates.

5.5 Dignity and Respect

WADS Foundation creates a work environment where the principles of dignity and respect for all staff, associates, and partners, in all locations are at the heart of what the organization does. Included in this are the principles of being non-judgemental when hearing the concerns and complaints of survivors of sexual exploitation and abuse.

5.6 Zero Tolerance

WADS Foundation has zero tolerance for any forms of sexual exploitation and abuse.

5.7 Confidential

WADS Foundation is committed to confidentiality and information will not be shared outside of the Safeguarding Committee unless it is absolutely necessary, and the safety of the person involved is a concern.

6. Policy Implementation

This policy will guide WADS Foundation staff through the definitions of sexual exploitation and abuse as well as governance and responsibilities. The associated procedures and resources will provide information on how to report any complaints, the format of the reporting, and how these complaints will be managed.

The Directors together with the Executive Board, has ultimate responsibility for this policy and the PSEA Framework and its proper management, using a systematic approach. As such, the Directors and the Executive Board will receive a summary of any reported sexual exploitation and abuse incidents and follow-up measures taken at each Executive meeting.

7. Responsibilities

WADS Foundation is committed to following through on the following measures in order to ensure that the organization is observing its PSEA commitments:



8. WADS Foundation Obligations

Working on Alternative Development Solutions (WADS) Foundation believes that all people have a right to live their lives free from sexual exploitation and abuse and will not tolerate its staff, associate, or partners engaging in any sort of behaviour that puts beneficiaries or communities at risk. To that end, *Working on Alternative Development Solutions (WADS) Foundation* commits to:

- Creating a safe culture for both those it serves and those who work for and represent the organization.
- Following through on any complaints and concerns in a timely manner through its Safeguarding Committee and taking each complaint seriously. Sensitizing staff,

associates, and partners, around how to make a complaint. Ensuring zero tolerance towards sexual exploitation and abuse.

- Building a culture of dignity, honor and respect where all those who work with and are served by *Working on Alternative Development Solutions (WADS) Foundation* feel empowered to report complaints.
- Educating staff, associates, and partners that sexual exploitation and abuse constitute gross misconduct and are grounds for termination of employment and possibly legal action.
- Providing information on how to report complaints and the investigations procedure. Ensuring that all staff, associates and partners have access to the PSEA policy and procedures as well as other related safeguarding policies
- Providing training to all staff, associates and partners

9. Staff Responsibility

All staff, associates, and partners are required to adhere to this policy at all times and are obliged to report any suspicious of sexual exploitation and abuse of others. *All staff, associates, and partners are required to sign the associated Code of Conduct* and an acknowledgement of having read and understood the policy. The organization will keep a documentary evidence of all its staff/personnel regarding it.

10. Management Responsibility

All Directors and Managers / office In-charges hold overall accountability for this Policy and its Implementation. Managers also have a responsibility to support and develop systems that maintain an environment where all parties involved with *Working on Alternative Development Solutions (WADS) Foundation* understand how to behave, how to raise complaints and concerns, and what action will be taken.

The organization WADS Foundation keeps a systematic vetting procedure in place for candidates opting for job through proper screening. This includes, reference checks for sexual misconduct and a self-declaration by the job candidate requesting that they confirm that they have never been subject to sanctions (disciplinary, administrative or criminal) arising from an investigation in relation to SEA, or left employment pending investigation and refused to cooperate in such an investigation.

11. Safeguarding Committee

A Safeguarding Committee will be established at all the offices (in different states) of WADS Foundation (if there is any substantial work in that state). If in any state there is no office but there is a temporary work assignment, then that will be managed by the committee at the head office itself. WADS also intends to form committee as well as in each field location, as per the need. The Committee will function for a period of three years. The Safeguarding Committee is comprised of minimum 5 members:

1. One woman in a Senior Management Role / Member of the Executive Committee
2. A member will be from the respective offices operating across different locations in the country.
3. Members (one each) from the background of Medical practitioner, lawyer and psycho-social

The Safeguarding Committee will be responsible for informing and training all staff in safeguarding, PSEA and harassment policies and procedures. They will also be responsible for receiving and investigating any safeguarding complaints, including PSEA.

The Safeguarding Committee will be trained in all of the Safeguarding policies as well as reporting and investigations. The Safeguarding Committee will also be provided with training so that they are able to offer appropriate support as required.

12. Confidentiality of Complaint

Working on Alternative Development Solutions (WADS) Foundation will protect the confidentiality of sexual exploitation and abuse allegations to the greatest extent possible in order to protect the integrity of the investigation and prevent embarrassment, further discrimination or harassment, or retaliation.

Confidential or sensitive information obtained by any staff member during the course of an investigation shall not be disclosed to others unless required by law. Concerns of individuals regarding confidentiality of information provided by them will be handled as sensitively as possible, and information shall not unnecessarily be disclosed to others.

Working on Alternative Development Solutions (WADS) Foundation will share information about allegations of sexual exploitation, abuse and harassment only with those who need to know about it. Records relating to sexual exploitation, abuse and harassment complaints will also be kept confidential on the same basis.

13. Whistle-Blowing

As per WADS Foundation whistle-blowing policy, all disclosures will be treated in confidence. Any staff/contractors facing SEA issues can report directly to the WADS management. Reports may be submitted anonymously to the Directors/Executive Directors of the organization.

14. Prohibited Retaliation

Working on Alternative Development Solutions (WADS) Foundation maintains a zero-tolerance policy for retaliation against anyone for reporting sexual exploitation or abuse, assisting in making a complaint, or participating in an investigation. Any staff, associate, or partner who makes a good-faith complaint of sexual exploitation or abuse, assists, testifies, or participates in any investigation or proceeding or who reasonably opposes such conduct in the workplace will not be adversely affected in the terms and conditions of his or her employment and will not be discriminated against or discharged for engaging in such activity. Complaints of retaliation will be promptly investigated. If retaliation is substantiated, appropriate disciplinary action, including possible dismissal, will be taken.

16. Assistance and Referrals

To be consistent with the IP Protocol and other UN SEA instruments the organization can refer SEA victims to available support services available locally such as the local administration, women helplines, women police stations etc. based on their needs and consent. The entire assistance and referral shall be confidential and will be in consent with the victim's requirement.

17. PSEA Commitments

All WADS Foundation staff, associates, and partners are expected to conduct themselves in accordance with the PSEA policy. All staff, member's partners and vendors associated or in partnership with the organisation shall follow the PSEA policy. The organization remains committed to the PSEA policy guidelines.

18. Sexual Activity with Children and Vulnerable Adults

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 in the age of the child is not a defence. Sexual activity with vulnerable adults, as outlined in the definitions, is also prohibited.

19. Child Marriage

Any staff, associates, or partners who engage in child marriage (marriage to anyone under the age of 18) will be in violation of the PSEA policy. As per the definition of child marriage, anyone under the age of 18 for Girls and 21 for boys is not able to give or withhold consent and is considered a form of sexual violence. Any staff married to a child under the age of 18 as per the custom or law of India, before WADS Foundation PSEA policy came into force will not be subject to disciplinary action. *Working on Alternative Development Solutions (WADS) Foundation*, however, prohibits any such relationship from occurring once the PSEA policy came into effect.

20. Sexual Activity with WADS Foundation Beneficiaries

Sexual activity with any beneficiary is prohibited due to inherently unequal power imbalances. A 'Beneficiary' is one who falls in the ambit of work activity or project implementation or who has received some sops or benefits from the organization. WADS Foundation strongly denounce such behaviours and actions for any Beneficiary directly or indirectly linked and will be dealt in accordance with the PSEA policy.

21. Grooming and/or Coercion

Any grooming and/or coercion of a child or vulnerable adult for the purposes of obtaining sex is prohibited.

22. Sexual Exploitation

Any form of sexual exploitation is prohibited including:

22.1 Buying Sex

Exchange of money, material assistance, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitive behaviour is prohibited.

22.2 Profiting from Sexual Exploitation

Any monetary, social or political gain from sexual exploitation is prohibited.

22.3 Sexual Harassment

Any act of sexual harassment including unwelcome sexual advances or requests for sexual favours is prohibited both under the PSEA policy and the Anti-Harassment policy.

22.4 Sexual Violence

Any act of sexual violence is prohibited. This includes, but is not limited to, sexual violence including intercourse, sexual touching, and threats of sexual violence.

22.5 Physical/Emotional Abuse

Any physical or emotional abuse is prohibited.

This list may be expanded at any time and details will be communicated with staff, associates and partners through the Safeguarding Committee.

23. Consequences

Any staff, associate, or partner who is in violation of the PSEA policy will face disciplinary procedures, which may result in disciplinary action, termination of employment or contract and/or referral to the appropriate law enforcement agency or legal authority.

24. Communication and Training

It is WADS Foundation responsibility to ensure that all staff, associates and partners are aware and fully compliant with the PSEA policy. In order to take the steps to prevent any forms of sexual exploitation or abuse, *Working On Alternative Development Solutions (WADS) Foundation* will ensure that:

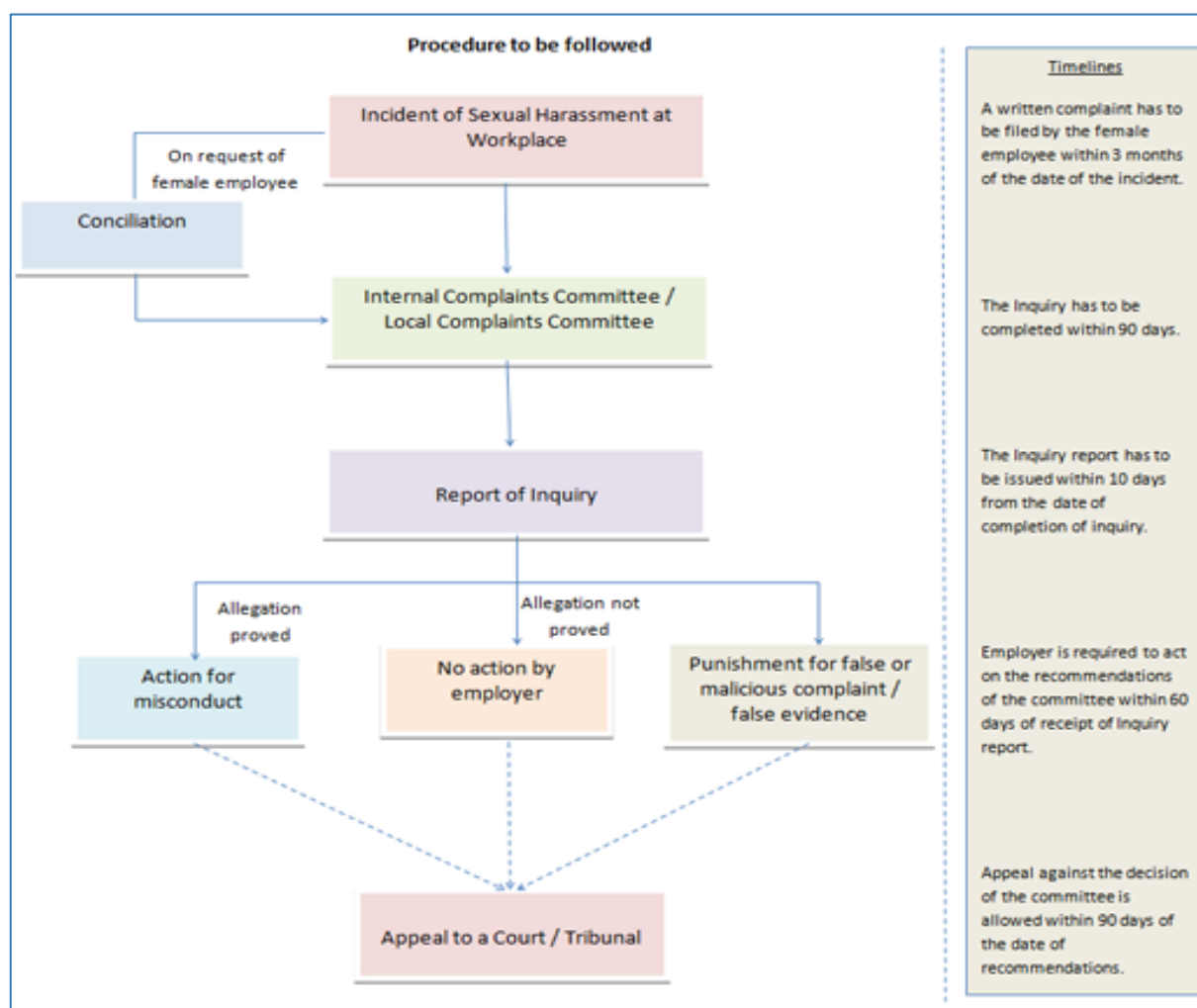
- Training is provided for all staff who has a specific responsibility for implementing this Policy and associated Procedure or who may be involved in dealing with complaints, which arise.
- Awareness raising training is provided to all staff, associates, and partners on PSEA. The training will equip staff, associates, and partners to develop awareness as well as an understanding of when and how to report any concerns.
- Proactive steps are taken to communicate the zero-tolerance message.
- All staff is informed of and trained in the policy and procedure.
- All staff is aware of the definitions under this policy.
- All staff is aware of reporting procedures.
- All staff has signed and acknowledged that they have read and understood the policy.
- *Working on Alternative Development Solutions (WADS) Foundation* will develop appropriate communication materials on PSEA to share and disseminate messages with its staff, partners and vendors and communities it works with

WADS Foundation will conduct **training of the staff annually** on the PSEA. External resource persons from other related organizations will be engaged to facilitate the training.

25. PSEA Reporting Procedures and Inquiry

WADS Foundation will create an environment where, in both situations/ cases of SEA and SH individuals, communities, WADS Foundation's personnel and partners feel safe to report violations and trust that immediate and decisive action will be taken against perpetrators. The reporting procedures are trusted and simple. In cases of SEA, complaint mechanisms are 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. An SEA risk assessment and a contextualized need assessment will inform the development of new complaint channels and reinforce existing channels.

Anyone working with *WADS Foundation* or its partners or the people with whom it works may report any incidents of sexual exploitation or abuse, which then will be investigated by the Safeguarding Committee. It is the duty and the responsibility of all staff, associates, and partners to report any PSEA concerns. The entire reporting process shall be confidential.



26. Support for Survivors

Support will be offered to survivors regardless of the outcome of any investigations. This support can include psychosocial counseling and/or access to other specialist support as needed.

The organisation has coordination and linkages with Medical practitioners, Psychosocial practitioners, legal advisors to support the survivors for any SEA related issues. The organisation has formal dialogue with them and they are available for any support required on SEA.

Sl.	Name	Designation	Contact details (Email)	Telephone
1	Dr. Israrul Haque, MBBS, MD (Medicine)	Medical Practitioner	haque257607@gmail.com	7050112785
2	Ms. Saptik Poddar, MSc and MPhil in Clinical Psychology	Clinical psychologist	psywork2022@gmail.com	91633 77314
3	Mr. Harish Kant Tiwari	Advocate- High Court	Harishkant19tiwari@gmail.com	9415367500

27. Appointment of Focal point to handle PSEA

WADS Foundation shall deploy a senior person in the organisation as the PSEA Focal point. S/he will support senior management in coordinating the development and implementation of PSEA policy and procedures. S/he will undertake this work of PSEA coordination in all the work areas of the organisation. The Focal Point shall work on three major strategies:

Prevention

- Ensure that the identity of the focal point is known throughout the entity and that contacts are made widely available.
- Provide training sessions on PSEA for all entity personnel, and implementing partners on a regular basis.
- In coordination with the organisation, provide awareness campaigns and sensitization for local communities on PSEA, with emphasis on what SEA is, beneficiary rights, where to report, complaint mechanism and victims' assistance.

- Support organizations recruitment activities to ensure that procedures to guard against hiring of persons who have a record of sexual exploitation and abuse offences are put in place and applied.
- Support programme managers in the implementation of the UN/IASC Protocols on Allegations of SEA involving Implementing Partners.
- Serve as focal point responsible for assessing and mitigating PSEA related risks at the organizational level.
- Make recommendations to management on enhancing prevention strategies, as appropriate.

Response

- Ensure that organizational procedures and mechanisms for reporting allegations of SEA are known to all field personnel, partners and as applicable, recipients of assistance and local communities.
- May receive allegations of alleged incidents of SEA, regardless of the institutional affiliation of the alleged perpetrator. Once an allegation is received:
 - ✚ Immediately – and in consideration of consent procedures - refer complainants to the victim assistance;
 - ✚ Immediately refer the allegation(s) to the entity's investigative unit;
 - ✚ Ensure that all materials pertaining to the allegation(s) are handled in strict confidence;
- Take appropriate measures to ensure safety and confidentiality for all visitors to the Focal Point.

Management and Coordination

- The focal point shall participate and coordinate to all PSEA level activities within the organisation and UN bodies
- Assist the organisation to fulfil his/her responsibilities in accordance with PSEA guidance and PSEA policy.
- Coordinate organization's adherence to relevant accountability/compliance mechanisms
- Keep data on reported incidents for general reporting and further development of efforts to address SEA

28. Victim assistance and support

- The responsibility of organisation entities to provide assistance and support begins as soon as information indicating that an individual may be a victim of sexual exploitation or abuse is received in any way or form. It does not require the receipt

of a credible allegation of sexual exploitation or abuse by a staff member or related personnel.

- Victims, as well as affected populations more broadly, should be fully informed of the guiding principles on the provision of assistance and support set out in this Protocol. They should also be informed that all United Nations staff and related personnel have an obligation to report allegations of sexual exploitation and abuse.
- The assistance and support provided to victims of sexual exploitation or abuse and referrals for assistance should be based on the existing services and programmes, such as the established gender-based violence and child protection referral pathways in-country
- Personnel trained on the process for referring victims for assistance in a safe and confidential manner
- Assistance and support for victims of sexual exploitation and abuse should be provided in a holistic, integrated manner with the support of a designated case manager where feasible and/or service provider with the necessary expertise and capacity. Assistance is provided on a case-by-case basis, in accordance with the needs of the victim. Common services for victims of sexual exploitation and abuse include:

Safety and protection: This entails the development of an immediate safety or protection plan to address the risk of retaliation, possible breaches of confidentiality or other further violence against the victim. The safety response should clearly set out roles and responsibilities, as well as capacities of designated or relevant actors. Subject to a risk-assessment, and based on the victims' consent and best interest, the safety or protection plan may include relocation support where necessary and appropriate.

Medical care: Medical care includes the provision of necessary treatment for conditions directly arising from sexual exploitation and abuse. In cases of sexual abuse, this includes informing victims about the importance of seeking medical care within 72 hours and providing the necessary referral to services, including HIV post-exposure treatment, post exposure prophylaxis, and reproductive and sexual health care as needed and desired. Medical care should be provided by the designated United Nations system organization or relevant partner.

Psychosocial support: This comprises the provision of basic psychosocial support, including psychological first aid, and psychosocial counselling to assist victims, in addition to evidence based, focused mental health and psychosocial support network (MHPSS) interventions and facilitating referrals to more specialized mental health care, as needed. Support may also include facilitating access to basic services, peer-to-peer support, enhanced social support through reconnecting victims with family members, friends and neighbours, and/or fostering social connections and interactions through existing community networks.

Education, livelihood support and basic material assistance: This entails the provision of food, clothing, shelter, school re-integration and livelihood support, in particular for victims in the most vulnerable situations to help address their immediate needs. In cases involving children, support and assistance should be provided for children's families or caregivers when determined to be in the best interests of the child. In such cases, the provision of food to host families, and provision of clothing and hygiene kits to victims may also be included.

Legal services: This entails the referral by the United Nations to providers of legal assistance if desired by the victim. In cases involving alleged perpetrators who are not nationals or permanent residents of the host country, legal service providers should be capable of handling cases that may involve multiple jurisdictions.

29. Special considerations for children

Children, including adolescent girls and boys, are particularly vulnerable to sexual exploitation and abuse because of their age, gender, size and dependency on others. In responding to child victims, United Nations entities and their partners shall adopt a child-sensitive approach that takes into account the vulnerabilities and capacities of the child, in a manner consistent with the Convention on the Rights of the Child: non-discrimination; best interests of the child; the right to life, survival and development; the evolving capacity of the child and their right to express one's views and have them considered.

As a primary consideration, a determination of the best interests of the child involves an ongoing assessment as to what would best protect a child's physical, psychological and emotional safety, security and well-being, and applies to decisions which affect the child as an individual, as a member of a specific group, and in general. In cases involving children, UNICEF should be consulted, and the processes conducted should follow child protection procedures compliant with the United Nations Approach to Justice for Children.

It is essential that those who interact with child victims have the necessary professional expertise and training. Because child victims of sexual exploitation and abuse may have particular assistance needs, assistance and support should be provided by, or in coordination with, child protection actors. The Protocol recognizes that adults who were victimized as children may also require special attention and appropriate measures will be considered.

In cases involving children, informed consent includes the informed consent of the child, according to their evolving capacities, and the child's parent, legal guardian or person acting in loco parentis, except when informing the parents or caregivers could put the child at risk (of retaliation, violence, abuse and/or neglect). Consent should be explained at the outset and obtained prior to, or in conjunction, with the provision of assistance to child victims.

During any investigation or legal process that may ensue, a child victim should be provided with appropriate assistance, which should include the accompaniment by a trained professional throughout the process when it is in the child's best interests. As in the case of any victim of sexual exploitation and abuse, children should be informed of the process and provided with clear information as to what to expect. This should include the provision of psychosocial support during information-collection and investigations. Interviews with children should be conducted in a way that is sensitive to the developmental stage and capacities of the child by persons who are properly trained on interviewing in a child-sensitive manner. The views of the child are important in the decision-making process and will be considered a significant factor in the settlement of the issue concerned.

30. PSEA investigation policy/procedures

WADS Foundation shall adhere to the PSEA policy developed and will act accordingly upon receiving incidences on PSEA. The entire team working in WADS shall be oriented on PSEA and shall be provided the required support if any such instances happen: The policy/procedures for investigation shall be:

- The first point of contact should be the line manager or the focal point designated in the project area/organisation to handle PSEA matters
- If the staff member genuinely believes that this reporting route is compromised, or that s/he would be victimized or s/he has no confidence in the WADS Foundation local management structure, then the complaint should be raised directly with another WADS Foundation manager or focal point at the regional or headquarters level.
- It is suggested that the complaint should be recorded or should be written using a standard complaint referral, which should be signed and dated.
- Once a complaint or report is made, the manager or designated focal point who receives the information should immediately report it to WADS Foundation designated focal point at headquarters. Once the complaint is received, the Head WADS Foundation, in consultation with the agency focal point and the Head of Office or Mission will consider the appropriate steps to take, including the initiation of preliminary inquiry or an investigation as per the Investigation Procedures.
- Any investigation that is undertaken must be completed, regardless of whether the alleged perpetrator is still a(n) WADS Foundation staff member. In the event that a complaint does not warrant a full investigation, the Head of Office or Mission may nonetheless be asked to take a number of steps to address concerns in other ways, (for example, addressing matters of poor practice via training, a change in working arrangements or a change in procedures)

- If the complaint involves staff of other agencies, NGO partners, contractors or others, such agencies must be informed of the complaint via established mechanisms.
- Staff members should be reassured that there will be no action taken against any member of staff who reports in good faith information indicating a violation of the WADS Foundation Staff Rules and Regulations and applicable codes of conduct regarding sexual exploitation and abuse and which, following investigation, proves unfounded. However, if a staff member knowingly and willfully reports false or malicious information regarding another member of staff, such false reports will lead to disciplinary action.
- A detailed record of information gathered via the complaints protocol should be kept confidentially on file as it may be used in subsequent disciplinary or legal action. Every effort must be made to ensure the security of such files.

Dedicated sources for investigation (Internal Control Committee)

The organisation has a zero tolerance for sexual exploitation and abuse. WADS Foundation will not tolerate its staff, associates, partners or any other representatives associated with the delivery of its work to engage in any form of sexual exploitation or abuse. WADS Foundation shall designate focal point person to assume responsibility for the oversight and monitoring of the investigation. The committee will comprise of two members – 1. will be from the local office or point of implementation 2. One senior member from the head office. The focal point person will be responsible for ensuring that an investigation is undertaken according to the principles of confidentiality, safety, impartiality, objectivity, thoroughness, timeliness and accuracy, in line with WADS Foundation's established sexual exploitation and abuse investigation procedures, and local inter-agency agreement or procedures. The committee will seek guidance from the safeguarding committee formed by the organisation on any issues related to SEA.

31. Contracts/partnership agreements

WADS Foundation will work in different geographies of the country focusing on allied sectors. During the process of work, it may happen to engage in partnership with various other agencies for the implementation. Partnership agreement's or contracts with other agencies will include a standard clause requiring sub-contractors, to adopt policies that prohibit SEA and to take measures to prevent and respond to SEA. The clause mentioning the SEA process for partnership agreements has been given as an Annexure.

32. Policy Review

To meet with sector best practice, *Working On Alternative Development Solutions (WADS) Foundation* agrees to review this policy and the entire PSEA Framework every two years, as a minimum. It is the responsibility of the Directors and the Executive Committee to complete this review, in collaboration with any key internal stakeholders or external third-party providers.

Self-Declaration

This is to declare that I, s/o, d/o, w/o

.....of.....

.....

(*address*) have never been involved to sexual misconduct or sanctions (disciplinary, administrative or criminal) arising from an investigation in relation to sexual exploitation and abuse (SEA), or left employment pending investigation and refused to cooperate in such an investigation.

(Applicant Signature)

Assistance and Referrals

The List of service providers for PSEA assistance and referrals are:

1. United Nations (UNICEF)
2. Local Police station
3. Women Help Line
4. Social Welfare Department
5. Child Line
6. Health Department/Doctors
7. Lawyers to support/provide legal support/advice
8. Psychosocial support through Counsellors

Contracts/partnership agreements

The key points for the contracts/partnership agreements with agency/individual/consultant '.....' and WADS Foundation regarding PSEA are:

WADS Foundation strongly abrogates the following within its organization culture and for the agency/individual/consultant "....." also. These are:

- ♣ Physical Abuse
- ♣ Child Emotional Abuse
- ♣ Neglect
- ♣ Vulnerable Adult Abuse
- ♣ Sexual Harassment
- ♣ Verbal harassment
- ♣ Physical harassment
- ♣ Visual and nonverbal forms of harassment

WADS Foundation and the shall create a work environment where the principles of dignity and respect for all staff, associates, and partners, in all locations is followed. The partner shall have zero tolerance for any forms of sexual exploitation and abuse. The *agency/individual/consultant* is committed to confidentiality and information will not be shared outside unless it is absolutely necessary, and the safety of the person involved is a concern. To be consistent with the IP Protocol and other UN SEA instruments the organization can refer SEA victims to available support services available locally such as the local administration, women helplines, women police stations etc. based on their needs and consent.

If the agency/individual/consultant or partner organization do not have a PSEA policy, then the staff, associates, and partners are expected to conduct themselves in accordance with the PSEA policy of WADS Foundation. All staff, members and partners associated shall follow the PSEA policy. The organization remains committed to the PSEA policy guidelines. If required and requested, WADS Foundation team may facilitate a training of the partner and its team on PSEA.

Signed By

.....

("Partner Agency")

Date:

Signed By

.....

WADS Foundation

Date:

Contracts/partnership agreements with Partner Agency

The key points for the contracts/partnership agreements with agency '.....' and WADS Foundation regarding PSEA are:

WADS Foundation strongly abrogates the following within its organization culture and for the partner "....." also. These are:

- ♣ Physical Abuse
- ♣ Child Emotional Abuse
- ♣ Neglect
- ♣ Vulnerable Adult Abuse
- ♣ Sexual Harassment
- ♣ Verbal harassment
- ♣ Physical harassment
- ♣ Visual and nonverbal forms of harassment

WADS Foundation and the shall create a work environment where the principles of dignity and respect for all staff, associates, and partners, in all locations is followed. The partner shall have zero tolerance for any forms of sexual exploitation and abuse. The partner is committed to confidentiality and information will not be shared outside unless it is absolutely necessary, and the safety of the person involved is a concern. To be consistent with the IP Protocol and other UN SEA instruments the organization can refer SEA victims to available support services available locally such as the local administration, women helplines, women police stations etc. based on their needs and consent.

If the partner organization do not have a PSEA policy, then the staff, associates, and partners are expected to conduct themselves in accordance with the PSEA policy of WADS Foundation. All staff, members and partners associated shall follow the PSEA policy. The organization remains committed to the PSEA policy guidelines. If required and requested, WADS Foundation team may facilitate a training of the partner and its team on PSEA.

Signed By

.....

("Partner Agency")

Date:

Signed By

.....

WADS Foundation

Date:

Safeguarding Committee

The WADS Foundation safeguarding committee shall have five members. These five members are in the committee for a period of three years. After three years the committee shall be revised and a new committee will be formed with new members.

Sl.	Name	Designation	Contact details (Email)	Telephone
1	Shashibhushan Pandey	Director	shashibhusanpandey@gmail.com	82927 76657
2	Dr. Israrul Haque, MBBS, MD (Medicine)	Medical Practitioner	haque257607@gmail.com	7050112785
3	Ms. Saptik Poddar, MSc and MPhil in Clinical Psychology	Clinical psychologist	psywork2022@gmail.com	91633 77314
4	Harish Kant Tiwari	Advocate- High Court	Harishkant19tiwari@gmail.com	9415367500
5	Kalpana Pandey	Operations Incharge	kalpanashashirn@gmail.com	9452701158

Focal Point in Organisation

Sl.	Name	Designation in organisation	Contact details (Email)	Telephone
1	Indraneel Ghosh	Executive Director	indraneel0812@gmail.com	7004616231