

## HPI's PSEA Policy

Approved by: Executive Team

Version #: V02

Signature Required: as specified in each section

**Name of the policy: Protection from Sexual Exploitation and Abuse (PSEA) Policy**

### 1. INTRODUCTION AND ORGANIZATIONAL COMMITMENT

HPI is committed to creating and maintaining an environment in which all individuals—especially the communities we serve—are treated with dignity, respect, and protection. Sexual Exploitation and Abuse (SEA) represent a profound violation of human rights and a betrayal of trust. HPI adopts a zero-tolerance approach to SEA and is dedicated to preventing, detecting, and responding to any form of misconduct.

This policy outlines the standards of behavior expected from all individuals associated with HPI and establishes clear procedures for reporting, responding to, and investigating SEA concerns. It is aligned with ST/SGB/2003/13 requirements, the IASC Six Core Principles, and international safeguarding best practices. Moreover, HPI accepts the standards of conduct listed in section 3 of the ST/SGB/2003/13.

### 2. PURPOSE OF THE POLICY

The purpose of this policy is to ensure that HPI takes all necessary measures to prevent SEA and responds appropriately when concerns arise. It provides a framework for:

- Protecting the rights and dignity of survivors
- Ensuring accountability for misconduct
- Establishing safe and accessible reporting channels
- Guiding staff and partners in ethical and professional conduct
- Maintaining trust with communities, donors, and stakeholders

This policy applies to all HPI operations, regardless of location or funding source.

### 3. SCOPE OF APPLICATION

This policy applies to every individual who works with or represents HPI in any capacity. This includes full-time and part-time staff, volunteers, interns, consultants, contractors, and implementing partners. The standards outlined here extend to all interactions with community members, beneficiaries, colleagues, and external stakeholders.

## 4. DEFINITIONS

HPI uses internationally recognized definitions to ensure clarity and consistency.

**Sexual Exploitation** refers to the abuse of a position of vulnerability, differential power, or trust for sexual purposes, including profiting monetarily, socially, or politically from the sexual exploitation of another.

**Sexual Abuse** refers to actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

**SEA** is the combined term used to describe both sexual exploitation and sexual abuse.

A **survivor** is any person who has experienced SEA.

A **child** is any person under the age of 18, regardless of local laws.

## 5. ZERO-TOLERANCE APPROACH

HPI strictly prohibits all forms of SEA. This includes, but is not limited to:

- Engaging in sexual activity with anyone under 18
- Exchanging money, employment, goods, or services for sex
- Using one's position to request or pressure others into sexual activity
- Any behavior that humiliates, degrades, or exploits another person

Any individual found to have violated this policy will face disciplinary action, up to and including termination of employment or contract, and may be referred to legal authorities.

## 6. ORGANIZATIONAL RESPONSIBILITIES

### 6.1 leadership responsibilities

The President holds ultimate responsibility for ensuring organizational compliance with this policy. The President receives incident reports, authorizes investigations, and ensures that appropriate actions are taken.

### 6.2 PSEA Focal Point

HPI designates a senior leadership member as the PSEA Focal Point. This individual oversees reporting channels, conducts preliminary reviews, coordinates investigations, and ensures that survivors receive appropriate support. The Focal Point also ensures that all staff and partners understand their obligations under this policy.

### 6.3 Alternate Focal Point

An alternate focal point is appointed to ensure continuity and to manage cases where conflicts of interest arise.

### 6.4 Responsibilities of All Staff and Partners

Every individual associated with HPI is responsible for upholding this policy. This includes reporting concerns immediately, participating in training, and adhering to the Code of Conduct and PSEA Acknowledgment.

## 7. REPORTING MECHANISMS

HPI is committed to ensuring that reporting SEA is safe, accessible, and confidential. To achieve this, all reporting channels are available 24 hours a day, 7 days a week, and are monitored daily by the PSEA Focal Point.

Reports may be made through HPI's internal application, email, WhatsApp, or in person. Individuals may also report anonymously. HPI recognizes that survivors and witnesses may fear retaliation or stigma, and therefore encourages reporting through whichever channel feels safest.

Anonymous reports are accepted and reviewed. A preliminary assessment is conducted for all anonymous submissions, and a full investigation proceeds when sufficient information is available.

## 8. SURVIVOR-CENTERED RESPONSE

HPI prioritizes the safety, dignity, and well-being of survivors. A survivor-centered approach means:

- Respecting the survivor's wishes and choices
- Ensuring confidentiality at all stages
- Providing access to medical, psychosocial, legal, and protection services
- Allowing flexible work arrangements or leave when needed
- Ensuring the survivor is never pressured to participate in an investigation
- Guaranteeing that no retaliation or negative consequences occur

Survivors are treated with compassion, respect, and without judgment.

## 9. WHISTLEBLOWER PROTECTION

HPI recognizes that individuals who report SEA concerns may face risks. To protect them, HPI guarantees that whistleblowers acting in good faith will not face disciplinary action, retaliation, or negative employment consequences. Their identity will be kept confidential to the greatest extent possible.

## 10. RECRUITMENT AND VETTING

For employment at HPI, all prospective staff members are screened to exclude individuals with a history of misconduct. This process includes reference checks, verification of employment history, and confirmation that the candidate has not been dismissed for misconduct. Criminal record checks are performed when there is red flags and where legally feasible. All new hires must complete the SEA Self Declaration form and sign the Code of Conduct and PSEA Acknowledgment before starting work with HPI.

## 11. TRAINING AND AWARENESS

All HPI staff, volunteers, contractors, and implementing partners are required to complete Protection from Sexual Exploitation and Abuse (PSEA) training as a condition of their engagement with the organization. This training must be completed during onboarding and prior to commencing any duties. The training covers HPI's PSEA Policy, Code of Conduct, reporting mechanisms, and expected standards of behavior. Refresher training will be provided as needed, particularly when significant policy updates occur or as required by donors or regulatory bodies. Participation in PSEA training is mandatory and non-compliance may result in disciplinary action, up to and including termination of employment or contract.

## 12. RECORD-KEEPING AND DATA PROTECTION

HPI maintains SEA case records in a secure online system designed to protect confidentiality and prevent unauthorized access. Only designated individuals have permission to view case files, and all access is logged. Files cannot be downloaded, copied, printed, or edited. Records are retained for **5 years** and then securely deleted unless legal requirements dictate otherwise.

## 13. GOVERNANCE AND OVERSIGHT

The Board plays a limited but critical role in PSEA oversight. It is involved only in cases that concern senior leadership or where a conflict of interest prevents internal management from overseeing the investigation. Routine reporting is not required; instead, reporting is incident-driven to ensure rapid leadership engagement when necessary.

## 14. INVESTIGATIONS

HPI uses a hybrid investigation model. The PSEA Focal Point conducts a preliminary review to determine whether reasonable grounds exist. If so, a full investigation is initiated. External investigators are engaged when cases involve senior leadership, present conflicts of interest, or require specialized expertise. All investigations follow principles of fairness, confidentiality, and impartiality.

## 15. SANCTIONS AND DISCIPLINARY MEASURES

Depending on the severity of the misconduct, sanctions may include written warnings, suspension, termination, or referral to legal authorities. For partners, sanctions may include contract suspension or termination.

## 16. PARTNER COMPLIANCE

All implementing partners must adhere to HPI's PSEA standards. They are required to sign PSEA commitments, ensure their staff follow these standards, and report SEA concerns to HPI immediately. In addition, every contract with partners must include a PSEA section as specified in this framework.

## SECTION 17: DISCLOSURE OF PAST SEA ALLEGATIONS AND CORRECTIVE ACTIONS

### 17.1 disclosure requirement

HPI is committed to transparency and accountability in addressing Sexual Exploitation and Abuse (SEA). The organization will disclose, upon request by donors or regulatory bodies, any past SEA allegations involving HPI personnel, as well as evidence of corrective measures and actions taken in response. Such disclosures will be made anonymously, without personal data, and in compliance with national labor regulations.

### 17.2 corrective actions

For each substantiated allegation, HPI will provide a summary of the corrective actions taken, which may include disciplinary measures, termination, referral to authorities, or changes to organizational procedures.

### 17.3 no allegation statement

If HPI has not received any SEA allegations, a formal statement of 'no allegation' will be provided upon request.

### 17.4 confidentiality

All disclosures will maintain strict confidentiality and will not include personally identifiable information.