



GLOBAL  
CENTER ON  
ADAPTATION

# SAFEGUARDING POLICY

## PROTECTION FROM SEXUAL EXPLOITATION ABUSE AND HARASSMENT (PSEAH)

Document owner: Director Finance and Operations

Document users: GCA staff, representatives, partners and suppliers

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## Executive Summary and Details

Purpose & Objectives	This policy aims to set out GCA's approach to preventing and addressing sexual exploitation, abuse, and harassment (PSEAH).
Description & Scope	<p>The Global Center on Adaptation (GCA) does not tolerate sexual exploitation, abuse, or harassment of any kind. GCA has a zero-tolerance approach to inaction or mishandling of SEAH.</p> <p>This policy is necessary to strengthen GCA's approach to safeguarding by enhancing accountability and improving support for people affected.</p> <p>GCA will not tolerate its employees, volunteers, consultants, partners, or any other representative associated with the delivery of its work carrying out any form of sexual harassment, sexual exploitation or sexual abuse. GCA commits to supporting survivors, improving safeguarding capacity, reporting, investigating, responding to, and preventing sexual harassment and sexual exploitation and abuse.</p> <p>Representatives have a duty to report actual or suspected sexual exploitation, abuse, or harassment of any kind in accordance with this Policy.</p>

This policy applies to	All Staff and representatives of the Global Center on Adaptation
Commencement date	30 August 2022

## 1. Guiding Principles

This Policy is underpinned by six principles. The principles reflect The Global Center on Adaptation's (GCA) commitment to address SEAH and reduce violence against women, children, gender diverse people and those who are vulnerable.

### 1.1. Zero Tolerance of Inaction

Sexual exploitation, abuse and harassment is never acceptable. The Global Center on Adaptation has a zero tolerance approach to inaction or mishandling of SEAH. "Zero-tolerance" means that GCA will pursue all allegations of sexual exploitation, abuse, or harassment in a fair and reasonable way with due regard for procedural fairness; and that appropriate disciplinary measures will be applied if wrongdoing is established. In addition, certain matters may be referred to authorities for prosecution.

### 1.2. Strong Leadership accelerates Change of Culture

Strong leadership is essential for accelerating the pace of change, as leaders set an organizational culture. GCA expects its leadership to set clear expectations and model respectful behavior in their interactions at work. This will support communities, victims/survivors, and whistleblowers to feel safe, report concerns and be assured their allegations are taken seriously.

### 1.3. Survivor Needs are Prioritized

Action to address SEAH should be underpinned by a "do-no-harm" approach, prioritizing the rights, needs, and wishes of the survivor, while ensuring procedural fairness to all parties. This approach:

- treats the survivor with dignity and respect.
- involves the survivor in decision-making.
- provides the survivor with comprehensive information.
- protects privacy and confidentiality.
- does not discriminate based on gender, age, race/ethnicity, ability, sexual orientation, or other characteristics.
- considers the need for counseling and health services to assist the victim/survivor with their recovery.

### 1.4. Preventing Sexual Exploitation, Abuse and Harassment is a Shared Responsibility

Preventing Sexual Exploitation, Abuse and Harassment is everyone's responsibility. Real change to reduce SEAH will not occur unless all staff and partners play a role. GCA requires the commitment, support, and investment of its partners for this policy to be effective. All GCA's partners have a responsibility to build their capacity to deal sensitively and effectively with SEAH that occurs in the course of their work

## 1.5. Gender Inequality and other Power Imbalances are Addressed

Inequalities based on the distinctions of worker/beneficiary; ability/disability; ethnic status; religion; gender identity and sexual orientation; age; health and poverty, can also result in SEAH. The intersection of gender with other forms of inequality can further increase the likelihood of SEAH occurring. Engagement with intended beneficiaries should be based on respect for diversity, promotion of gender equality and social inclusion, accountability, and a strong “**do-no-harm**” focus.

## 1.6. Stronger Reporting will enhance Accountability and Transparency

Sexual exploitation, abuse and harassment is a failure of responsibility. GCA and its partners are mutually accountable for preventing Sexual Exploitation, Abuse and Harassment. Stronger reporting allows GCA to better monitor SEAH, understand risks, and improve systems and safeguards accordingly.

## 2. PSEAH Core Principles

GCA is committed to achieving full, ongoing implementation of the Six Core Principles<sup>1</sup> relating to Sexual Exploitation and Abuse by the Inter-Agency Standing Committee (IASC) Working Group on Prevention and Response to Sexual Exploitation and Abuse, the Inter-Agency Standing Committee Minimum Operating Standards on PSEA and the Core Humanitarian Standard on Quality and Accountability.

- Sexual exploitation and abuse by GCA Employees and related personnel constitute acts of gross misconduct and are, therefore, grounds for termination of employment or contract/agreement.
- Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of the majority or age of consent locally. Mistaken belief in the age of the child is not a defense
- Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited at all times. This includes buying sex or the exchange of assistance that is due to beneficiaries.
- Sexual relationships between GCA Employees and related personnel and community members we work with are forbidden. Any relationships that involve improper use of rank or position, or that may undermine the credibility and integrity of GCA work is prohibited.
- Where a GCA Employee or Related Personnel develops concerns or suspicions regarding sexual abuse or exploitation or sexual harassment by a fellow worker, whether within GCA or not, he or she must immediately report such concerns via GCA's established reporting mechanisms outlined Section 5.
- GCA Employee and related personnel are obliged to create and maintain an environment that prevents sexual exploitation, abuse and harassment and any form of child abuse and promotes the implementation of this Policy and GCA's Code of Conduct. GCA Managers at all levels have responsibilities to support and develop systems, which maintain this environment.

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<sup>1</sup> The six Core Principles are from the UN Secretary-General's Bulletin on Special measures for protection from sexual exploitation and sexual abuse

## 3. GCA Safeguarding Commitments

GCA is dedicated to fulfilling the following commitments to prevent and respond to sexual exploitation, abuse, and harassment (SEAH) as highlighted in the six Core Principles outline in Section 2 above.

### 3.1. Organizational culture, Leadership and Accountability

- GCA will make every effort to promote, create and maintain a safe organizational culture for all people who work for and with GCA including our partners and the communities where GCA works. GCA Leadership will promote GCA's safeguarding values by highlighting the organization's commitment to equality, diversity, and respect for others. GCA will create an environment where it is safe to address sexual harassment, exploitation and abuse, and child abuse.
- GCA will ensure high-level oversight, accountability, and transparency around its safeguarding efforts through monitoring and reviewing our safeguarding performance. GCA is committed to continuous learning and improvement to prevent and respond to sexual harassment, exploitation and abuse, and child abuse. Safeguarding efforts and progress will be communicated to various internal and external audiences, including GCA governance and leadership structures, staff, donors, partners, the wider sector, and communities. All information shared will be informed by a survivor-centered approach and risk assessment.
- GCA will develop organization-specific safeguarding strategies, with appropriate levels of dedicated capacity and allocated resources at all levels of the organization, to prevent and respond to sexual harassment, exploitation and abuse, and child abuse

### 3.2. Embedding Safeguarding in GCA Workplace

- GCA will seek to employ staff who are aligned with our vision, mission, and values, and, in compliance with applicable laws, prevent known perpetrators of sexual harassment, exploitation and abuse and child abuse from being (re)hired. Managers and Human Resource teams will ensure robust recruitment screening processes for all personnel.
- GCA will ensure that multiple channels are available and accessible to Employees and Related Personnel, community members we work with, and others to safely report sexual exploitation and abuse and sexual harassment
- GCA will provide training and information to all Employees and Related Personnel, as part of their induction trainings on PSEAH and Safeguarding when they join GCA, including a briefing on GCA's policies and values, the Code of Conduct, information about how to report concerns, and advice about where to seek further information about safeguarding and safer practices across the organization. GCA will provide focused training particularly to GCA Employees and Related Personnel focal points for receiving complaints, to ensure understanding of their obligations and how to discharge their duties should they receive a complaint.

### 3.3. Embedding Safeguarding in GCA Programs

- GCA will undertake safeguarding risk assessments to identify areas of safeguarding and sexual harassment, exploitation, and abuse, and child abuse risks, and document steps

that are being taken to remove or reduce these risks with the aim to identify and mitigate or minimize, risks arising from our programs.

- GCA will incorporate safeguarding measures into programs and throughout the project cycle through a collaborative program design approach, including with our partners and program participants, with the aim to identify and mitigate, or minimize, risks arising from our programs.
- GCA will ensure that multiple mechanisms for reporting sexual harassment, exploitation and abuse, and child abuse are accessible and sensitive to the differing needs of anyone wishing to report, GCA will ensure that anyone responsible for receiving reports understands how to perform their duties and handle them in a safe and confidential manner. We will be transparent with survivors around any obligations or actions that may need to be taken as a result of their report, including referral to third parties. All actions will be informed by an assessment of risk to all those involved.
- GCA will ensure adequate safeguarding assessments are conducted as part of due diligence processes before engaging in partnerships or sub-grant agreements. Selection of GCA partners will consider the partners commitment to social justice and equality, organizational values, and how the partner safeguards its staff and program participants. GCA will ensure that subgrant agreements will:
  - i. incorporate this Policy as an attachment.
  - ii. include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to abide by a Code of Conduct that is pursuant to the standards of this Policy; and
  - iii. expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against sexual exploitation and abuse and sexual harassment, to investigate and report allegations thereof, or to take corrective actions when SEAH has occurred, shall constitute grounds for GCA to terminate such agreements.
  - iv. GCA will include assessments on partner capacity including existing Safeguarding policies, procedures and training and, where not in place, will provide capacity building and support as part of entering into any new partnership.

### 3.4. Responding to SEAH Reports

- GCA will respond in a professional and timely manner to all concerns or allegations of sexual exploitation, abuse, or harassment. All concerns or allegations will always be taken seriously, and investigated and acted upon where appropriate, in line using the survivor-centered approach to ensure the safety and well-being of victim-survivors, and that their dignity and human rights are upheld throughout the process.
- GCA will provide support and assistance to complainants and to anyone who has experienced sexual harassment, exploitation and abuse, or child abuse by GCA Employees and Related Personnel. This may include medical treatment, legal assistance, and psycho-social support. Our support and assistance will be informed by a survivor-centered approach, feasibility, and an assessment of risk to all those involved.
- A comprehensive and agile incident management system will be consistently maintained across the organization, with consideration for local statutory and legal requirements. All allegations of SEAH, and subsequent follow-up, will be documented in a secure and confidential database to ensure accountability.



- GCA will conduct independent, safe, and discreet investigations, through trained investigators working with GCA's Safeguarding Team, recognizing the rights of and duty of GCA to everyone involved, including complainant and/or survivor, Subject of Complaint (SoC) and witnesses. An independent and gender representative decision-making panel will be assigned in every investigation to ensure impartiality, transparency, and accountability.
- GCA will take swift and appropriate action against GCA Employees and Related Personnel who are found to have committed SEAH. This may include administrative, disciplinary, legal action, and/or referral to the relevant authorities for appropriate action, including criminal prosecution.
- GCA will take appropriate actions to the best of its abilities to protect persons from retaliation where allegations of sexual harassment, exploitation and abuse, or child abuse involving GCA Employees or related are reported in good faith.

## 4. Roles and Responsibilities

GCA believes PSEAH is everyone's responsibility.

A breach of this policy or any of its associated policies may constitute gross misconduct resulting in disciplinary actions against individuals, and for organizations, termination of contracts and/or funding.

**All GCA Employees and Related Personnel** – All GCA Employees and Related Personnel share an obligation to prevent, report and respond to sexual harassment, exploitation and abuse and child abuse. It is the responsibility of all GCA Employees and Related Personnel to uphold GCA's Safeguarding Policy and Code of Conduct.

**Supervisory Board** – is accountable for this Safeguarding Policy and require from leadership regular reports on policy implementation and risks to inform their guidance for the organization.

**Executive Board** – is responsible for the application of this policy. It is responsible for defining and appropriately resourcing workplans and procedures to uphold and operationalize this policy as well as monitoring and reporting against this policy.

**Executive Leadership Team (ELT) members** – are responsible for ensuring GCA procedures, practices, plans, and operations align with this policy. ELT must ensure their teams are aware of this policy and understand their responsibilities.

**Managers, Supervisors and Human Resource Manager** – must ensure that all GCA Employees and Related Personnel understand and comply with GCA's Safeguarding Policy. Human Resource Manager is also responsible for robust safe recruitment and induction, whilst Managers and Supervisors are responsible for ensuring staff have a thorough awareness and sensitization to this policy and the issues it raises. Managers must ensure that all staff with specialized duties towards this policy have the appropriate experience, training, and support available to them, including staff responsible for receiving and handling sensitive reports and staff responsible for investigations.

**Safeguarding focal point** – is GCA's employee, identified as the point of contact for PSEAH and is responsible for implementing the policies and procedures; receiving and managing reports and investigations; reporting to the Supervisory Board and other stakeholders.

**Program Teams** – Collaborate with relevant colleagues to assess inherent safeguarding-PSEAH risks in proposed project activities, beneficiary engagement and location context, and build in sufficient protection, prevention, reporting and response mechanisms to address identified risks. Teams must analyze the safeguarding roles, capacities, processes, and activities required to effectively support projects and allocate resources appropriately in budgets. Program teams are responsible for supporting and monitoring partner organizations' safeguarding-PSEAH obligations and commitments to ensure they are met and are consistently in alignment with GCA's principles.

**Partner Organizations** – Must have a PSEAH framework that clearly communicates its organization's PSEAH commitment, how it will prevent and respond to SEAH concerns and how program participants and stakeholders can report. Partner organizations must report all SEAH incidents related to GCA projects promptly to the Safeguarding Focal Point. Organizations must provide appropriate training and briefing for its staff, program participants and community members to raise awareness on PSEAH, and how to identify and report concerns safely and confidentially.

## 5. Reporting a Complaint

All GCA Employees and Related Personnel have a responsibility to report any suspicion or concern of SEAH. Any individual can raise a concern/complaint to GCA about an incident they have experienced, witnessed, or heard about concerning a GCA staff member or partner (suppliers, partners, contractor, etc.) without fear of retribution.

There is no deadline for filing a formal complaint, though we urge all reports to be made within 24 hours of becoming aware of them. Reports by an identified complainant as early as possible after the alleged incident(s) of prohibited conduct are strongly encouraged, as anonymity and the passage of time may result in challenges to effective investigation and resolution

GCA Employees and related Personnel, program participants, partners and community members can report, in writing or verbally, suspected or confirmed cases of sexual exploitation, sexual abuse and sexual harassment through any one of these established pathways:

- Notify your Line Manager, HR Manager, or any member of the Leadership Team.
- Notify GCA's Safeguarding Focal Point at [safeguarding@gca.org](mailto:safeguarding@gca.org) or by phone on **+31 643147051**
- Report using the webform on GCA's website: <https://gca.org/reportanincident/>
- Report anonymously using: [www.suggestionox.com/r/GCA\\_Whistleblow](http://www.suggestionox.com/r/GCA_Whistleblow)

### Confidentiality

- Complaints can be made anonymously. Every effort will be made to maintain confidentiality throughout the complaints process. Information that identifies individuals involved in a complaint will be limited to personnel with the absolute need to have such information and will not be shared further without obtaining the informed consent of the survivor, except if someone's life is at risk, a child is at risk, or as required by law in consultation with legal counsel and where safe to do so.
- Non-identifying information will be shared as per donor and regulatory body reporting requirements.
- Staff involved in the complaints process will be made aware of the importance of maintaining confidentiality and may be asked to sign a confidentiality agreement. Employees who breach confidentiality may be subject to disciplinary action up to and including termination of employment, and others who work with GCA may have their relationship with GCA terminated. In some cases, such breaches may constitute breaking the law.

### Retaliation against Complainants

- GCA will take action against anyone, whether they are the subject of a complaint or not, who seeks or carries out retaliatory action against complainants, survivors, other witnesses, or the subject of complaint. Employees may be subject to disciplinary action, up to and including termination of employment. Others who work with GCA may have their relationship with GCA terminated.

## Glossary & Abbreviations

For the purpose of this policy, the following terms and abbreviations are defined below:

Employees and Related Personnel	All employees of GCA as well as board members, volunteers, interns, and consultants, individual and corporate contractors of these entities and related personnel. This includes non-GCA entities and their employees and individuals who have entered into partnership, sub-grant or sub-recipient agreements with GCA.
Sexual Abuse	The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This would include forced marriage and sexual slavery and also includes sexual activity with a child (any person under the age of 18).
Sexual harassment	<p>Sexual harassment is any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another</p> <p>Sexual harassment can take various forms. It can be obvious or indirect, physical or verbal, repeated or once-off and perpetrated by any person of any gender towards any person of any gender.</p> <p>Sexual harassment can be perpetrated against beneficiaries, community members, citizens, as well as employees and personnel.</p> <p>Some examples of behavior that may be sexual harassment include:</p> <ul style="list-style-type: none"> <li>• staring or leering;</li> <li>• unnecessary familiarity, such as unwelcome affection or touching;</li> <li>• suggestive comments or jokes;</li> <li>• insults or taunts of a sexual nature;</li> <li>• intrusive questions or statements about your private life;</li> <li>• displaying posters magazines or screen savers of a sexual nature;</li> <li>• sending sexually explicit emails or text messages;</li> <li>• inappropriate advances on social networking sites;</li> <li>• accessing sexually explicit internet sites;</li> <li>• requests for sex or repeated unwanted requests to go out on dates; and</li> <li>• behavior that may also be considered an offense under criminal law such as physical assault, indecent exposure, sexual assault, stalking or obscene communications.</li> </ul>
Sexual exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes

	profiting monetarily, socially, or politically from sexual exploitation of another.
Safeguarding focal point	The Safeguarding Focal Point is responsible for ensuring implementation of GCA's Safeguarding Policy, Guidelines and Procedures), and for ensuring that appropriate action is taken to deal with and/or report to appropriate agencies, incidents of SEAH, incidents of suspected SEAH or breaches of the GCA's Code of Conduct promptly.
Survivor	The person who it is alleged has been the subject of sexual harassment, abuse or exploitation.
Complainant	The person who raises a complaint (this may or may not be the survivor).
Subject of Complaint / Subject of Concern / SoC	The person against whom the allegation, complaint or concern has been raised.
GCA	The Global Center on Adaptation
Safeguarding	The measures we take to prevent, report and respond to harm or abuse and to protect the health, well-being and human rights of anyone that comes into contact with GCA, whether it is GCA Employees and Related Personnel, partners, program participants and communities.
Representative	Everyone affiliated with GCA in various ways, including employees, temporary staff (day workers), contractors, consultants, advisors, interns, fellows, Young Leaders, volunteers, board members etcetera.



## Annexures

- Annex 1: Code of Conduct
- Annex 2: Incident Reporting Form
- Annex 3: Response Flow Chart