

Imagine Worldwide

Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH) Policy

Purpose

Imagine Worldwide (Imagine) believes that all people have the right to live their lives free from sexual violence. This policy affirms our commitment to ensuring a secure environment to protect all individuals from any harm that may be caused due to their coming into contact with Imagine. The policy outlines the expectations, roles and responsibilities of our personnel, contractual partners, and others to prevent, report and respond to incidents of sexual exploitation, abuse, and harassment (SEAH).

Imagine has a zero-tolerance approach to SEAH. This means that we will take seriously any concern raised and address it promptly and appropriately. It means we hold our representatives accountable for the highest standards of conduct, regardless of their position within the organization.

This policy should be read alongside Imagine's [Safeguarding and Child Protection Policy](#) and the [Employee Handbook](#).

Scope

This policy applies to all Imagine employees, trustees, advisors, and visitors ("Imagine personnel") as well as Imagine grantees, contractors, sub-grantees, and sub-contractors ("contractual partners"). It applies during and outside working hours, every day of the year.

Key Definitions¹

Sexual abuse: the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions". All sexual activity with a child is considered as sexual abuse. "Physical intrusion" is understood to mean "sexual activity".

Sexual exploitation: any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including but not limited to profiting monetarily, socially, or politically from the sexual abuse of another.

Sexual harassment: 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 offence or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment.

Principles for Preventing SEAH

Our approach is first and foremost to *prevent* SEAH through awareness raising and mitigation. Our response to reports of SEAH or suspicion of SEAH will be immediate and will prioritize protection of the survivor(s).

¹ United Nations Glossary on Sexual Exploitation and Abuse (Second Edition), July 2017.

Prevention - Awareness and training: ensure that all personnel and contractual partners are aware of our high standards of conduct and what is expected of them to protect individuals from any form of sexual abuse and exploitation in their private and working lives. This will be underpinned by strong human resource processes, strong leadership, and organizational accountability.

Prevention - Mitigation: ensure that personnel and those who work with Imagine use best practices to minimize the risks of any form of SEAH in its activities and operations. Actions include relevant vetting of personnel and contractual partners and embedding SEAH in our risk management framework. We will monitor and review our mitigation plans annually.

Reporting: require that any breach of this PSEAH Policy or suspicion of an individual being harmed or at risk of harm be reported promptly to a manager, Imagine’s Compliance Officer, or a PSEAH community focal point (see Community-Based Complaint Mechanism below). Imagine will ensure that all staff and those who work with Imagine are clear on the steps to take where suspicions or concerns arise regarding allegations of sexual exploitation or abuse of individuals in places where it works.

Responding: respond immediately to reports of sexual exploitation and abuse and ensure the safety and well-being of the person being exploited or abused. Imagine will not retaliate against any personnel or contractual partner who in good faith report violations or suspected violations of SEAH in its operations or activities.

PSEAH Code of Conduct

We are committed to the highest standards of conduct at every level and depend on the personal and professional integrity of all personnel and contractual partners to uphold these standards. We expect all personnel and contractual partners to behave in ways that uphold our organizational values:

Children come first: we are child-centered, putting children’s well-being above all else.

Integrity: we respect the communities in which we work and hold ourselves to the highest ethical standards.

Collaboration: we work together with our partners, governments, and communities to bring the best learning solutions to children.

Accountability: we hold ourselves accountable—individually and collectively—to deliver evidence-based and sustainable programs at scale.

Continuous improvement: we are flexible and innovative, incorporating lessons learned from our research and implementations to continuously improve the impact of our work.

The following examples of behavior related to SEAH are *strictly prohibited*:

1. Sexually exploiting, abusing, or harassing another person.
2. Engaging in any sexual activity with a child or children regardless of the age of majority or age of consent locally.
3. Condoning or participating in behavior that is harmful, exploitative, abusive, or unsafe.
4. Developing, encouraging, or failing to take action on relationships with children or other vulnerable adults that could in any way be deemed sexual, exploitative, or abusive.
5. Acting in ways that may be violent, inappropriate, or sexually provocative.

Roles and Responsibilities

The Imagine Board of Directors is responsible for

1. Ensuring that PSEAH policies, procedures and approaches are in place and being implemented.
2. Fostering and maintaining an organizational culture that supports PSEAH that includes ensuring that (i) personnel understand our shared values and how they prevent SEAH; SEAH; (ii) senior leadership model the organization's values that present SEAH; and (iii) the organization's policies and practices address issues of gender, diversity, and empowerment.
3. Identifying the designated board member who will work with the CEOs and Compliance Officer to ensure that all policies are updated and adhered to, and will lead investigation of any compliance reports.
4. Ensuring that the organization has investigated and taken accountability for all PSEAH issues, and implemented acceptable resolutions to all issues of non-compliance. Being accountable for serious SEAH incidents.

The Imagine Management Team is responsible for

1. Ensuring that PSEAH measures are implemented.
2. Assigning an internal Compliance Officer for PSEAH who will support the development and implementation of PSEAH policy and procedures.
3. Ensuring that PSEAH responsibilities are reflected in role and job descriptions and performance management.
4. Ensuring that whistleblowing procedures are in place that encourage people to report on concerns without fear of reprisals.
5. Ensuring that SEAH risks are included in our Risk Framework as a separate category with an assigned owner.
6. Ensuring that all contracts with partners/suppliers/contractors include clauses on PSEAH, that capacity building for partners includes capacity to implement PSEAH measures, and that partner monitoring includes PSEAH measures and SEAH reports.
7. Treating any breach of this PSEAH Policy as a disciplinary matter, which may result in immediate termination of employment or contract, as well as reporting to the police or relevant authority.
8. Developing specific procedures for implementing the PSEAH Principles as part of Imagine pilots, programs, research, and implementation activities.
9. Ensuring regular reporting to the Board of Directors on implementation of the PSEAH policy.
10. Carry out an annual review of this PSEAH Policy and related procedures and, where applicable, revise based on lessons learned.

Imagine personnel and contractual partners are responsible for:

1. Adhering to the PSEAH Policy and reporting concerns.

Imagine managers are responsible for:

1. Fostering and maintaining an organizational culture that supports PSEAH.

2. Ensuring all new employees receive the PSEAH Policy training as part of their induction.
3. Ensuring PSEAH measures are implemented within their area of responsibility and risk assessments conducted on systems, processes, and activities.
4. Following up and addressing SEAH issues appropriately and consistently.

Imagine Human Resource staff are responsible for:

1. Implementing the necessary measures when recruiting new staff and volunteers.
2. Ensuring all new employees receive a copy of the PSEAH Policy as part of their induction.
3. Serve as focal points for addressing SEAH misconduct within the workplace.

Imagine Program Staff are responsible for:

1. Ensuring that communities are aware of the PSEAH Policy and how to report concerns.
2. Serving as focal points (where appropriate) for SEAH with affected populations.
3. Conducting SEAH risk assessments of all programs.
4. Ensuring PSEAH is in the design and implementation of programs (see Annex A for checklist).

Reporting

Imagine is committed to ensuring that policies and procedures are in place to prevent all forms of sexual misconduct in the workplace, in our programs, with our partners, and in the communities where we work.

Reporting sexual misconduct in the workplace is addressed in our [Employee Handbook Whistleblower Protection Policy](#). This covers reporting responsibilities and procedures, and our commitment to confidentiality and no retaliation for anyone who, in good faith, reports concerns.

Community-Based Complaint Mechanism

A community-based complaint mechanism (CBCM) is an integral part of our program implementation. Key stakeholders from each school community are invited to community engagement meetings where, among other topics, Imagine's partners discuss how to handle cases of sexual misconduct. Community stakeholders appoint key individuals to act as "community officers" with responsibility for receiving and, where appropriate, escalating reports of sexual misconduct. Community officers work with a designated staff member from the implementation partner organization (i.e. PSEAH community focal point) and, together, they receive and manage reports of sexual misconduct.

Where reports of SEAH involve individuals within the community, reporting channels are established in consultation with the community in such a way as to ensure accessibility and cultural sensitivity. The community should define multiple reporting options, such as text or call or email, designated community officers of all genders, etc., in order to cater to diverse preferences. All channels are required to protect the confidentiality of the identities of all involved throughout the reporting process.

Where reports of SEAH involve a community officer or staff of the implementation partner or Imagine, several reporting channels are available. Issues involving a community officer will be reported to the staff of the implementing partner through one of several channels (in-person, sms, phone call, email). Issues involving staff of the implementing partner or staff of Imagine are reported to the community officer, who will be provided with several channels to report the issue to Imagine Worldwide's Compliance

Officer, including text, whatsapp, email, and a form on the Imagine Worldwide website. All channels will protect confidentiality of the identities of all involved throughout the reporting process.

Whichever channels are used to report the issue, we maintain our principles as noted above. The community officers and the designated staff from the implementation partner receive training on managing SEAH reports within the community. This training includes guidance on how to maintain confidentiality, survivor support, and more.

Community engagement meetings are conducted periodically throughout the implementation of Imagine's programs, and these events are used to continuously and proactively encourage members of the community to report incidents of SEAH. The Implementation Partners will also facilitate a review of the CBCM protocols and gather feedback for improvement.

Response

Imagine has a zero-tolerance approach to SEAH, and substantiated complaints will be addressed promptly to ensure a safe and secure environment for all. Disciplinary actions will be proportionate to the findings and may include but are not limited to, termination, legal actions, and reporting to relevant authorities. All reports of sexual misconduct are handled consistently and in accordance with the severity of the offense.

During an investigation process, the emotional and physical well-being of the survivor is prioritized. The designated community officers and implementation partner staff are able to provide survivors with information and guidance on available counseling services, legal assistance, medical care, and other resources essential for their recovery.

In cases where a reported incident falls outside the scope of the CBCM, the designated community officers and implementation partner staff members guide survivors to appropriate external entities or authorities that can address their specific concerns. The referral process is designed to be transparent and survivor-centered, ensuring that individuals receive the necessary support regardless of whether the incident is within the CBCM mandate.

Imagine Worldwide is committed to transparent reporting on the outcomes of SEAH investigations. Regular updates on the status of investigations, actions taken, and improvements to procedures will be communicated to the Board, staff, and partners.

Signature

As the undersigned, I have read, understood, and commit to adhere to Imagine's Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) Policy. I understand that any breach of this PSEAH Policy may result in immediate termination of employment or contract, as well as reporting to the police or relevant authority.

Organization: _____

Signature: _____

Print Name: _____

Date: _____

Annex A: Checklist for Imagine Worldwide PSEAH Policy Issues

Actions	Yes/No
Partners	
Have partners/suppliers/contracts been vetted for their contact with children, vulnerable adults and affected populations and their capacity to implement PSEAH measures?	
Are PSEAH clauses included in all contract agreements?	
Is there a mechanism for delivering PSEAH training to partners/suppliers/contractors who will have contact with program beneficiaries?	
Programs	
Do Imagine programs identify and address potential risks of SEAH?	
Does program design include SEAH risk mitigation?	
Do program/project plans include activities on PSEAH awareness raising?	
Do program budgets include funding for capacity building and communications on PSEAH?	