

Justice Revived Foundation

Protection from Sexual Exploitation & Abuse (PSEA) Policy

Version 1.1 | Approved: _20_ / _01_ / 2025 | Next Review: January 2027

Table of Contents

1. Policy Purpose, Scope & Reference Standards
2. Definitions & Abbreviations
3. Guiding Principles & Commitments
4. Governance, Roles & Responsibilities (incl. RACI)
5. Code of Conduct & Prohibited Behaviour
6. Reporting & Complaints Mechanisms
7. Response, Investigation & Case Management
8. Survivor-Centred & Confidentiality Safeguards
9. Partner & Supplier Compliance
10. Training, Awareness & Culture
11. Monitoring, KPIs & Continuous Improvement
12. Sanctions & Disciplinary Measures
13. Policy Review & Amendment
14. Annexes (Templates & Tools)

1 | Policy Purpose, Scope & Reference Standards

Purpose: JRF maintains a zero-tolerance stance on any form of Sexual Exploitation, Abuse or Harassment (SEA/H) by its staff, volunteers, partners, suppliers or any representative. This policy articulates mandatory standards to prevent, detect and respond to SEA/H, ensuring survivors receive timely protection and support.

Scope: Applies to **all** JRF personnel (staff, Board members, consultants, interns, volunteers), partners, suppliers and anyone acting on JRF’s behalf in any location or programme context.

Reference Standards:

- UN Secretary-General’s Bulletin ST/SGB/2003/13 on Special Measures for Protection from Sexual Exploitation and Abuse
- IASC Six Core Principles on PSEA
- Ghana Labour Act, 2003 (Act 651) – provisions on sexual harassment
- Ghana Children’s Act, 1998 (Act 560) – child protection overlaps
- JRF Child Safeguarding, Anti-Fraud, HR & Data Protection Policies

2 | Definitions & Abbreviations

Term / Acronym	Definition
SEA	Sexual Exploitation & Abuse: Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes. Includes transactional sex.
SH	Sexual Harassment: Unwanted sexual advances, requests for sexual favours or other verbal or physical conduct of a sexual nature.

Term / Acronym	Definition
Beneficiary	Anyone receiving or intended to receive assistance, services or programmes from JRF.
Survivor	A person who has experienced SEA/H.
PSEA Focal Point	Designated staff member coordinating PSEA implementation and response.
HR	Human Resources department.
DPO	Data Protection Officer.
CoI	Conflict of Interest.
DTO	Deputy Team Owner (for investigations).

3 | Guiding Principles & Commitments

1. **Zero Tolerance:** All forms of SEA/H are prohibited.
2. **Survivor-Centred:** Prioritise the rights, dignity and well-being of survivors, offering choice and confidentiality.
3. **Do No Harm:** All activities must minimise risk and avoid retraumatization.
4. **Transparency & Accountability:** Maintain clear reporting, investigation and sanction processes.
5. **Equality & Respect:** Ensure no discrimination against any survivor or reporter.
6. **Confidentiality:** Safeguard personal data according to JRF's Data Protection Policy.

4 | Governance, Roles & Responsibilities

4.1 Oversight Structure

Level	Role	Responsibilities
Board of Directors	Ultimate oversight	Approve policy; receive quarterly anonymised PSEA reports; ratify high-severity cases.
Executive Director	Accountable	Allocate resources; ensure policy enforcement; liaise with authorities on severe cases.
PSEA Focal Point	Responsible	Day-to-day coordination; case intake and oversight; training delivery; donor liaison.
HR Department	Consulted	Incorporate PSEA clauses into contracts; manage disciplinary processes.
All Staff & Representatives	Informed / Responsible	Duty to read, understand, sign policy; report concerns; cooperate in investigations.

4.2 High-Level RACI

Task	Board	ED	PSEA FP	HR	Staff
Policy approval	A/R	C	C	I	I
Case intake & triage	I	C	R	I	R
Investigation & decision	I	C	R	C	I
Sanctions & follow-up	C	R	C	A/R	I

Task	Board	ED	PSEA FP	HR	Staff
Training rollout	I	C	R	C	R
Partner compliance checks	I	C	R	C	I

A = Accountable, R = Responsible, C = Consulted, I = Informed

5 | Code of Conduct & Prohibited Behaviour

Mandatory Prohibitions for All JRF Personnel & Associates:

- **No sexual activity** with beneficiaries, whether consensual or coerced.
- **No transactional sex:** exchange of money, goods, services or employment for sexual activity.
- **No sexual relationships** with children (under 18) under any circumstances.
- **No pornographic material** production, consumption or distribution in JRF settings.
- **No sexual harassment:** unwelcome sexual advances, remarks or gestures.
- **No retaliation** against survivors, reporters or witnesses.

All staff and partners must sign the PSEA Code of Conduct (Annex A) on onboarding and annually thereafter.

6 | Reporting & Complaints Mechanisms

Channel	Details	Confidentiality	Response Time
Hotline	Toll-free: +233 (0) xxx xxx xxx	Option to remain anonymous	Acknowledge within 24h
Secure Email	psea@...org	Encrypted, anonymous option	24h
Web Portal	www.justicerevived.org/psea-report	No IP logging, multi-language	24h
In-Person	PSEA Focal Point or any manager	Private meeting	24h
Partner Channels	Partner focal points, complaint boxes	As per partner SOP	48h

- **Mandatory Reporting:** All JRF personnel must report any suspicion or knowledge of SEA/H without delay.
- **Anonymous Reporting** allowed; no adverse consequences for non-identification.
- **No Retaliation:** Strictly prohibited; breach leads to disciplinary action.

7 | Response, Investigation & Case Management

7.1 Case Classification & Timelines

Category	Criteria	Triage	Investigation Start	Completion
A - High	Sexual abuse, exploitation, child involvement, multiple allegations, staff implicated	24 h	72 h	30 days

Category	Criteria	Triage	Investigation Start	Completion
B - Medium	Harassment, boundary violations, single allegations with minor harm	48 h	5 days	45 days
C - Low	Code of Conduct breaches with no direct harm (e.g., inappropriate comments)	72 h	10 days	60 days

7.2 Investigation Process

1. **Intake & Triage:** PSEA FP logs report; conducts risk/safety assessment.
2. **Assign Case Lead:** Independent of implicated parties; declare CoI.
3. **Develop ToR & Plan:** Define scope, methods, interview guides.
4. **Evidence Gathering:** Interviews (survivor first, with support), document review, digital forensics if needed; maintain chain of custody.
5. **Analysis & Findings:** Triangulate evidence, assess credibility, document conclusions.
6. **Decision & Sanctions:** Panel (PSEA FP + ED + HR) determine sanctions per Section 12; inform Board for Category A.
7. **Feedback to Survivor:** Provide outcome summary, support referrals, safeguarding measures.
8. **Closure & Lessons Learned:** Update PSEA dashboard; feed control improvements into training and SOPs.

All case data stored encrypted with access limited to PSEA FP, ED and DPO.

8 | Survivor Centred Approach & Confidentiality

- **Informed Consent:** Obtain before any interview; adjust language to capacity and context.
- **Safety First:** Implement immediate protection measures (relocation, medical care, police).
- **Choice & Empowerment:** Survivor chooses support services; can involve trusted adult or advocate.
- **Privacy:** No identifying information in internal/external reports without explicit consent; pseudonymise data.
- **Data Handling:** Align with JRF Data Protection Policy; retention: 7 years or per donor requirements.

9 | Partner & Supplier Compliance

- **Due Diligence:** Partners and suppliers must complete a PSEA self-assessment (Annex E) and sign binding PSEA clauses.
- **Contractual Right:** JRF may audit, suspend funding or terminate agreements on any breach.
- **Capacity Building:** Provide PSEA training and guidance to partners; monitor compliance via quarterly reports.

10 | Training, Awareness & Culture

Audience	Frequency	Format	Owner
All new staff & volunteers	Within 2 weeks	Induction workshop + e-learning	PSEA FP
All staff & partners	Annually	Refresher e-learning + case studies	PSEA FP
Investigators & focal points	Biennial	2-day specialised training	External expert / PSEA FP
Communities & beneficiaries	Biannual	Outreach sessions, posters, radio spots	Programmes Team

11 | Monitoring, KPIs & Continuous Improvement

Quarterly Board Report:

- of PSEA reports by category & channel
- % reports acknowledged in 24h; investigation started within SLA
- Survivor satisfaction rate (anonymised feedback)
- % staff & partner training completion
- of control improvements implemented

Annual External Review: Benchmark against IASC and donor standards; recommend policy updates.

12 | Sanctions & Disciplinary Measures

Severity	Example Behaviours	Potential Sanctions
Minor	Unauthorised private messaging with a beneficiary	Written warning; retraining
Moderate	Inappropriate comments or non-physical boundary violations	Final warning; suspension; donor notification
Severe	Sexual abuse/exploitation; harassment of child or vulnerable adult	Immediate suspension; dismissal; contract termination; law enforcement referral; donor and regulator notification

All sanctions must be documented in the Sanctions Decision Record (Annex D) and approved by HR and ED (Board for severe cases).

13 | Policy Review & Amendment

- **Scheduled Review:** Every two years (next January 2027) or sooner if:
 - Changes in Ghanaian or international law/standards.
 - Major incident reveals policy gaps.
 - Donor requirement changes.
- **Amendments:** Drafted by PSEA FP, reviewed by ED and HR, approved by Board, and communicated within 10 working days.

14 | Annexes (Templates & Tools)

- **Annex A** – PSEA Code of Conduct (Staff & Partners)
- **Annex B** – PSEA Reporting & Intake Form
- **Annex C** – PSEA Investigation Terms of Reference (ToR) Template
- **Annex D** – Sanctions Decision Record



- **Annex E** – Partner PSEA Self-Assessment Checklist
- **Annex F** – Survivor Referral Directory
- **Annex G** – Confidentiality & Non-Retaliation Statement (for reporters & witnesses)

Prepared by PSEA Focal Point - July 2025

Approved by Executive Director & Board Chair