



AIDOS PSEA POLICY

Protection from Sexual Exploitation and Abuse

(30 June 2021)

AIDOS PSEA Policy

Policy title: Protection from Sexual Exploitation and Abuse

Policy objective: To promulgate policy of zero tolerance for Sexual Exploitation and Abuse (SEA) for all AIDOS and partners' human resources¹ and ensure that roles, responsibilities and expected standards of conduct in relation to SEA are known within AIDOS. To create and maintain a safe environment, free from SEA, by taking appropriate measures for this purpose, internally and in the countries and communities where AIDOS operates, through robust prevention and response work.

Targeted Audience: All AIDOS human resources, including partner organizations' human resources.

Acronyms

FP	Focal Point
HQ	Headquarters
IASC	Inter-Agency Standing Committee
PSEA	Protection from Sexual Exploitation and Abuse
SEA	Sexual Exploitation and Abuse
SOP	Standard Operating Procedure
UN	United Nations

Definitions

Beneficiaries	The individuals, groups, or organizations that directly or indirectly benefit from an intervention, project, or program.
Child	A person under the age of 18, regardless of the age of majority or age of consent locally.
Complainant	The person who initially notifies AIDOS or its partners of the sexual exploitation and abuse allegation.
Gender-based violence (GBV)	An umbrella term for violence directed toward or disproportionately affecting someone because of their actual or perceived gender identity. Sexual exploitation and abuse are a form of GBV.
Informed consent	The voluntary agreement of an individual who has the capacity to give consent, and who exercises free and informed choice.
Survivor	Refers to a person who is, or has been, sexually exploited or abused.

¹ The term "human resources" includes staff, volunteers, associates, consultants and other profiles, as well as partner organizations' human resources, who interact with beneficiaries in the context of AIDOS projects.

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Whistle-blower	Any AIDOS or partner organizations' human resource who reports SEA
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1. Policy statement:

1.1. SEA violates universally recognized international legal norms and standards and are unacceptable behaviors and prohibited conduct for all humanitarian and development workers², including AIDOS human resources as well as partner organizations' human resources.

1.2. AIDOS has a policy of zero tolerance towards SEA. All AIDOS and partner's human resources are expected to uphold the highest standards of personal and professional conduct at all times, and to provide humanitarian and development assistance and services in a manner that respects and fosters the rights of beneficiaries and other vulnerable members of the local communities.

2. Scope of application:

This policy sets out AIDOS approach to prevent and respond to SEA. The policy applies to all human resources, both on-and off-duty.

3. Definitions of SEA³:

3.1. For the purposes of the present policy the term '**Sexual Exploitation**' means 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 exploitation of another.

3.2. Similarly, the term '**Sexual Abuse**' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

4. Commitment to PSEA:

4.1. AIDOS will make every effort to create and maintain a safe environment, free from SEA, and shall take appropriate measures for this purpose in the countries and communities where it operates, through a robust PSEA framework, including prevention and response measures.

4.2. This PSEA framework affirms AIDOS commitment to the UN Secretary General's Bulletin on Special Measures for protection from Sexual Exploitation and Sexual Abuse (ST/SGB/2003/13) and to achieving full, ongoing implementation of the IASC Six Core Principles relating to SEA⁴.

4.3 In addition, AIDOS is committed to pursuing a **survivor-centered approach** for responding to GBV, including SEA. This approach seeks to empower survivors and promote their recovery by prioritizing their rights, needs and wishes. Key standards for applying this approach include:

- **Safety:** The safety and security of the survivor is the primary consideration.
- **Confidentiality:** Survivors have the right to choose to whom they will or will not tell their story, and information should only be shared with the informed consent of the survivor.
- **Respect:** Respect for the choices, wishes, rights and dignity of the survivor should guide

² From the UN Secretary General's Bulletin ST/SGB/2003/13, 2003. Available at: <https://undocs.org/en/ST/SGB/2003/13>

³ Both definitions are adopted from the UN Secretary General's Bulletin ST/SGB/2003/13, 2003. Available at: <https://undocs.org/en/ST/SGB/2003/13>

⁴ IASC Six Core Principles relating to SEA, 2002. Available at: <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>.

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the decisions by organizations. The role of case managers is to provide the survivor with the information s/he needs to make informed decisions and to facilitate recovery.

- **Non-discrimination:** Survivors should receive equal and fair treatment regardless of their age, gender, race, religion, nationality, ethnicity, sexual orientation or any other characteristics.

4.4 AIDOS defines clear **responsibilities and expectations** on all actors directly involved in the implementation of PSEA actions and support them to understand and act in line with these:

- The **Administrator** is designated to have the lead responsibility for the development, review and implementation of the PSEA guiding principles and procedures.
- **AIDOS board** has the responsibility for overseeing the implementation of the policy.
- The **President** is the **Designated Liaison Person (DLP)** having the lead responsibility for ensuring that organizational reporting procedures and measures to be taken are followed correctly and promptly and acts as a liaison person with the board, the “focal points” and with the relevant authorities, where required.
- The **Vice-President** is the **Deputy Designated Liaison Person** and acts on behalf of the DLP in the event that the DLP is not available (e.g., due to annual leave, sick leave, etc.).
- **Key staff (Programme Officers/Project Managers)** are designated at central and regional/country levels as “focal points” with clearly defined roles and responsibilities to guarantee that any SEA concern is treated and investigated keeping the highest degree of confidence and to make sure that all human resources involved in the projects understand the designated persons’ responsibilities and have their contacts.

Any concern about the conduct of AIDOS human resources, as well as partner organizations’ human resources, shall be investigated. In case of concerns related to the DLP, these shall be addressed to the Deputy Designated Liaison Person or directly to the Board for further actions. All the staff, volunteers and collaborators in direct contact with beneficiaries will be made aware of the policy and will receive support and/or training as needed.

As rights holders with non-negotiable rights to protection, beneficiaries are made aware of their right to be safe from abuse and provided with support and advice on keeping themselves safe including information about where to seek for help.

5. Six core principles⁵:

5.1. SEA by AIDOS human resources, as well as partner organizations’ human resources, constitute acts of gross misconduct and are therefore grounds for termination of employment⁶ for AIDOS human resources and of the Partnership Agreement in case of partner organizations’ human resources.

5.2. 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 regarding the age of a child is not a defense.

⁵ Modified for the purposes of this PSEA policy. These acts are not intended to be an exhaustive list.

⁶ Including all other forms of contractual agreements, such as, for example, volunteer assignment.

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AIDOS' commitment to protect children from harm, including abuse, neglect, exploitation and violence, is also regulated by the Child Safeguarding Policy (CSP) of the organization.

5.3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to beneficiaries.

5.4. Any sexual relationship between AIDOS and partners' human resources and beneficiaries of assistance or other vulnerable members of the local community that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of development and humanitarian aid work.

5.5. Where an AIDOS human resource develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same organization or not, he or she must report such concerns via established reporting mechanisms.

5.6. All AIDOS and partners' human resources are obliged to create and maintain an environment which prevents SEA and promotes the implementation of this policy. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

6. PSEA framework:

6.1. Prevention

6.1.1. Vetting: AIDOS systematically vets all prospective job candidates in accordance with established screening procedures (ref. **Annex 1 - Checklist for PSEA sensitive recruitment, contracting and performance management**).

6.1.2. Training: AIDOS holds mandatory induction and refresher trainings⁷ for all its human resources on PSEA⁸ policy and procedures.

6.2. Response

6.2.1. Reporting and Investigation: AIDOS has safe, confidential and accessible mechanisms and procedures for human resources, beneficiaries and communities, including children, to report SEA allegations and ensures that beneficiaries are aware of these. AIDOS has also a process for investigation of SEA allegations and shall properly and without delay conduct an investigation of SEA committed by its human resources or refer to a proper investigative body if the perpetrator is affiliated with another entity (ref. **Annex 2 – Reporting and Response Procedures**).

6.2.2. Referral to National Authorities: If, after proper investigation, there is evidence to support allegations of SEA, these cases may be referred to national authorities for criminal prosecution.

6.2.3. Survivor assistance: AIDOS has a system to promptly refer SEA survivors to available services, based on their needs and consent.

6.3. Cooperative arrangements

Relevant AIDOS contracts and partnership agreements include a standard clause requiring contractors, consultants and sub-partners to commit to a zero-tolerance policy on SEA and to take measures to prevent and respond to SEA (ref. **Annex 3 - Declaration on compliance to PSEA**). The failure of those entities or individuals to take preventive measures against SEA, to

⁷ The training includes at a minimum: 1) a definition of SEA (that is aligned with the UN's definition); 2) a prohibition of SEA; and 3) actions that human resources are required to take (i.e. prompt reporting of allegations and referral of survivors).

⁸ Reference is made to the online UNICEF PSEA training course, agora.unicef.org

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investigate allegations thereof, or to take corrective action when SEA has occurred, shall constitute grounds for termination of any cooperative arrangement.

6.4 Implementation and Review

In order to successfully implement and adhere to the PSEA Policy, each AIDOS PSEA focal point is required to disseminate the PSEA Policy at local level.

AIDOS is required to:

- Support the AIDOS PSEA focal points to implement and adhere to the PSEA Policy.
- Monitor and report about progress on implementation to the AIDOS Board of Directors.
- Provide oversight and management support for alleged SEA Incidents Type 2.
- Revise the PSEA Policy every five years.

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ANNEX 1 - CHECKLIST FOR PSEA SENSITIVE RECRUITMENT, CONTRACTING AND PERFORMANCE MANAGEMENT

Job announcement and application stage

- Include PSEA and/or safeguarding clause in all job advertisements or position terms of reference (see sample language in Annex A).
- Require applicants to **self-declare** prior issues of sexual or other misconduct and termination of past employment and to consent to the disclosure of any misconduct or termination information by their former employers in job application.
- If candidate responds affirmatively to prior issues of misconduct or fails to consent to the disclosure of any misconduct, or if former misconduct is discovered during the vetting process, consider rejecting the application.

Interview stage

- Include questions on PSEA and/or Child Safeguarding in interview (see sample interview questions in Annex B).

Reference checks

- Verify references and vet for former misconduct (e.g., finger prints, prior criminal records, Google searches) in accordance with local laws regarding employment, privacy and data protection (see sample reference check questions in Annex C). *Consider verbal/oral reference checks for senior positions to complement written references.*

Induction process

- Require selected candidates to sign the AIDOS Code of Conduct and PSEA policy (provided to them in a language they understand) at the acknowledgment of the contract.
- Include a PSEA clause in employment contracts, including when subcontracting. In the contract, outline disciplinary measures in the event of proven SEA allegations (e.g., termination of contract).
- Include training in PSEA and/or Child Safeguarding as part of mandatory onboarding process and provide refresher courses at regular intervals during employment tenure.

Performance management

- Include adherence to Code of Conduct (e.g., participation in PSEA trainings) in performance appraisals of staff.
- Limit professional advancement opportunities of individuals under investigation.
- In cases of confirmed inappropriate behavior, take robust disciplinary action (e.g., dismissal, suspension, written censure or other administrative/corrective measures) and, where this involves possible criminal conduct, report the incident to law enforcement authorities.
- Maintain a database of disciplinary measures on human resources, including dismissals, to avoid rehiring them at a later point in time (see sample template in Annex D). Ensure data protection and inclusion in handover process.
- Consider developing a misconduct disclosure policy so that information of any human resource known to have committed SEA is shared with an organization considering employment of a particular staff member to avoid rehiring transgressors.

Annex A: Sample PSEA Clause for Job Advertisements

AIDOS has a zero tolerance to Sexual Exploitation and Abuse of beneficiaries. Protection from Sexual Exploitation and Abuse (PSEA) is everyone's responsibility and all AIDOS human resources are required to adhere to the Code of Conduct, that enshrines principles of PSEA, at all times (both during work hours and outside work hours). Familiarization with, and adherence to, the Code of Conduct and PSEA policy is an essential requirement of all AIDOS human resources, in addition to PSEA mandatory training. All AIDOS human resources must ensure that they understand and act in accordance with this clause.

Annex B: Sample Interview Questions on PSEA

Below are sample questions. Not all questions need to be asked.

- Have you ever been investigated for a breach of your organization's Code of Conduct, safeguarding or PSEA policy?
- The Organization's Code of Conduct applies to all staff, both on and off duty. Do you have any issues with that?
- Tell us about a time when you witnessed a case of abuse of power in the workplace. What action, if any, did you take? What did you learn?
- Some individuals may be more vulnerable to sexual exploitation and abuse than others. What groups or individuals do you think would be more at risk related to the position you have applied for?
- Consider this scenario: One of your team members, Maria tells you in confidence that another team member, Mario, behaved in an inappropriate way with some female beneficiaries. However, Maria asks you not to do anything, as she is afraid that it would damage the work relationship if Mario finds out she has reported him to you. What would you do? Who else should be involved?

Annex C: Sample Reference Check Questions on PSEA

Generally, only the listed referees should be contacted; however, in some cases, in order to gain a more objective point of view on past misconduct, the Human Resources Officer or relevant senior management staff member of the candidate's last place of employment may be contacted in order to provide a reference. *Consider oral/verbal reference checks to complement written references as referees may feel more comfortable speaking about past infringements instead of writing about them on paper.*

- How do you know the candidate?
- For how long have you known the candidate?
- Do you have any suspicions that the candidate violated your organization's Code of Conduct, including sexual exploitation and abuse and sexual harassment in the workplace?
- Hypothetically, would you like to employ or work with the candidate again? Why or why not?

Annex D: Sample Database of Disciplinary Measures

The following headings may be used if the organization does not already have a database of disciplinary measures. Ensure data protection by storing file securely (e.g., password protected, not in a shared folder and only accessible to select individuals); if the organization has a printed copy, make sure this is stored in a locked cabinet.

Name of staff member	Contract start date	Contract end date	Type of misconduct alleged	Allegation substantiated/unsubstantiated	HR Officer/Supervisor name	Comments

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ANNEX 2 – AIDOS REPORTING AND RESPONSE PROCEDURES

Acronyms

<p>CSP - Child Safeguarding Policy DLP - Designated Liaison Person FP - Focal Point GBV - Gender-Based Violence HQ - Headquarters SEA – Sexual Exploitation and Abuse SOP - Standard Operating Procedure</p>

Introduction

It is essential that all AIDOS and partners' human resources⁹, as well as beneficiaries and target communities, understand that:

1. SEA may be committed by staff, volunteers, community committee members, interns or consultants within AIDOS, AIDOS partners or other AIDOS associates;
2. SEA may be committed by other development and/or humanitarian aid workers.
3. SEA may be committed by authorities or leaders.
4. SEA may occur within families, communities, institutions or other care arrangements.
5. Beneficiaries may also be perpetrators of SEA.

AIDOS will provide support to any beneficiary involved in its projects in order to ensure them protection from further harm in bounds of the mandate, capacity and ability of the Organization to do so.

Identified and/or suspected cases of SEA need to be referred immediately to external protection specialized services/relevant authorities as indicated in AIDOS PSEA Policy, ensuring that the principles of the survivor-centered approach are adhered to, including informed consent or assent. Information is to be shared only on a need-to-know basis with the service provider, and the safety of the beneficiary and others involved paramount.

Determining whether you need to make a report

Concerns and reports may be received from a number of sources – including AIDOS human resources, partners' staff, volunteers, children and families/community members. All concerns and reports must be taken seriously. However, unless abuse has been proved to occur, it is recommended to refer to "alleged incident".

When there is a complaint, concern or suspicion of harm perpetrated against a beneficiary of AIDOS programs or a beneficiary who is not directly involved in AIDOS activities, this needs to be handled in accordance with the procedures illustrated below.

⁹ The term "human resources" includes staff, volunteers, associates, consultants and other profiles, as well as partner organizations' human resources, who interact with beneficiaries in the context of AIDOS projects.

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SEA Incidents are of two types:

- **Type 1:** Any SEA incident that is not committed by an AIDOS human resource (staff member, board, volunteer, intern, consultant, contractor, etc.), donor, sponsor, partner or other AIDOS affiliate. It may be perpetrated by a member of the affected or local community against a beneficiary of AIDOS programmes or another member of the community that is not involved in AIDOS activities.
- **Type 2:** Any violation of the SEA Policy and related standard of behavior which is committed by an AIDOS human resource (staff member, board, volunteer, intern, consultant, contractor, etc.), donor, sponsor, partner or other AIDOS affiliate. Harm, which is committed by another humanitarian aid worker, is also considered a CP Incident Type 2.

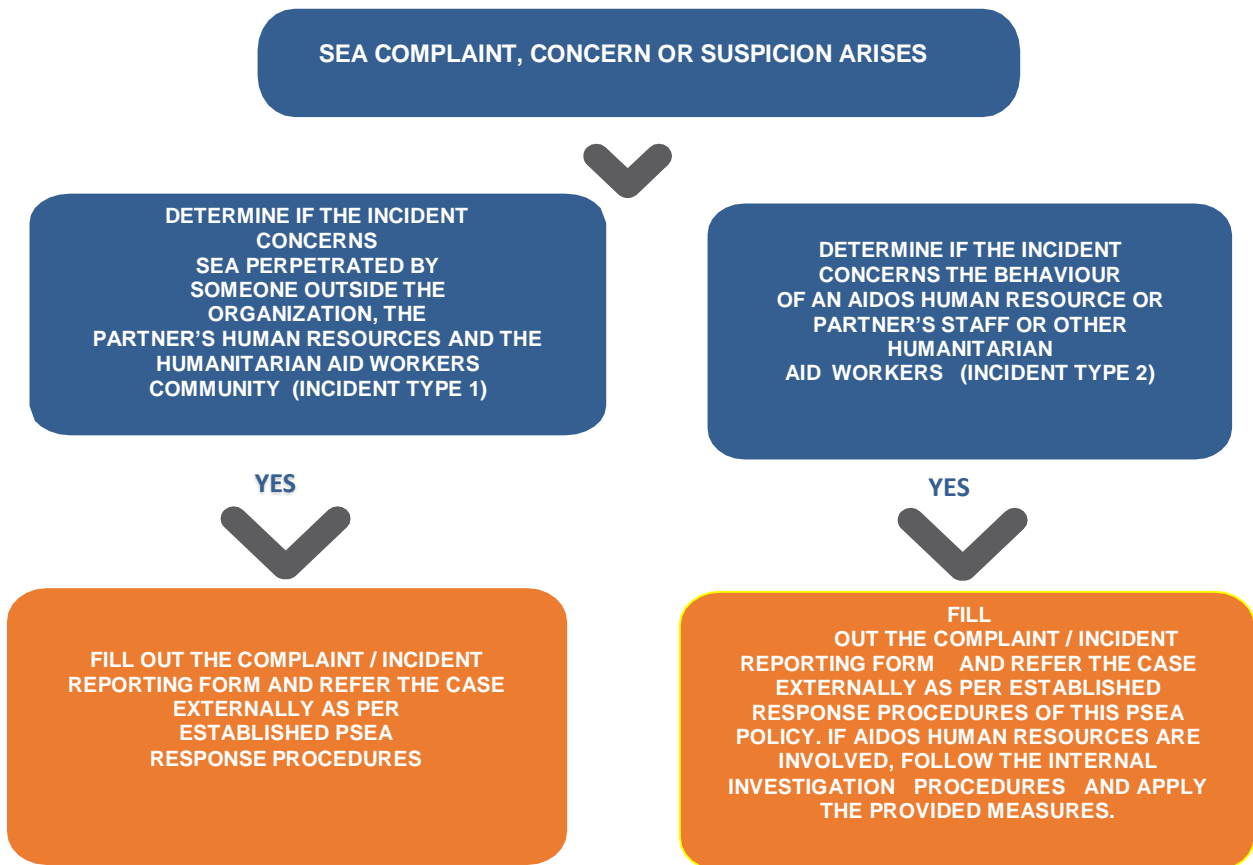
Reporting procedures

- The complainant must report the case to the PSEA Focal Point (FP) within 24 hours from when the complaint, concern or suspicion arises.
- The complainant must fill out the Complaint/Incident Reporting Form (**Annex A**) as soon as possible and submit it to the PSEA FP.

It is MANDATORY for all AIDOS human resources to handle complaints, concerns or suspicions of SEA in accordance with the established procedures¹⁰. This includes acts or omissions resulting in placing an individual at risk of SEA, or an act of SEA itself. When an AIDOS human resource is aware of a SEA incident involving AIDOS human resources, partners or associates, or other development and/or humanitarian aid workers, and fails to report it, he/she may be subject to disciplinary action, up to and including dismissal. Any intentionally false, malicious or vexatious statement, misrepresentation or accusation against another AIDOS or partners' human resource or third party will also be considered serious misconduct.

¹⁰ When a complaint, concern or suspicion of harm is perpetrated against a child who benefits from AIDOS programmes or a child who is not involved in AIDOS activities, this needs to be handled in accordance with AIDOS Child Safeguarding Policy (CSP).

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Response procedures

Interviews with SEA survivors:

Repeated interviews with survivors can contribute to a survivor's trauma. Therefore, coordination must be maintained with all other stakeholders to avoid duplication of interviews with an individual survivor. Furthermore, the following protocols need to be observed when interviewing alleged SEA survivors:

- Survivors will be told of the purpose of the interview and informed consent must be sought before the interview is conducted.
- Interviewers will ensure that survivors feel safe at all times.
- Interviews will not be conducted in any space where it may create suspicion amongst outsiders (including authorities, community members, etc.).
- All efforts will be made to ensure that survivors do not feel exposed or vulnerable during the interview.
- Interviewing techniques and methodologies should be age, culture and gender-appropriate.
- As much as possible, follow-up interviews/discussions will be conducted by the same interviewer.
- Survivors will be informed of all possible steps and obligations, including referral for assistance and possible investigation.
- At all times, interviewers must ensure the "Do No Harm" principle is adhered to.

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Appropriate measures will be taken in order to ensure safety and protection for survivors, as well as alleged perpetrators and complainants if different from the survivors. Where there is any conflict of interest between the survivor and another involved party, the survivor's wishes must be the principal consideration in case handling, particularly when there is a risk of additional physical and/or emotional harm.

Referral of SEA Cases for Assistance:

Adequate mechanisms need to be established in order to guarantee that SEA survivors are provided with timely and appropriate access to comprehensive assistance and care. Each PSEA FP will be responsible to ensure that PSEA referral pathways and related Standard Operating Procedures (SOPs) are operational and regularly updated in each country office/base where the project is implemented, as follows:

- Map SEA case management services provided by different agencies, organizations or structures at the local level and update them regularly.
- Apply SOPs for case referral that each agency, organization and structure that AIDOS will refer cases to already has. Ensure that agencies, organizations and services that AIDOS refers cases to, act according to a survivor-centred approach and relevant guiding principles. In line with the "Do No Harm" principle, where there are serious concerns related to meeting standards of care and relevant guiding principles, AIDOS should seek an alternative service solution based.
- Relevant staffs need to be trained on safe and ethical referral, as well as on the established referral pathways and related agencies' SOPs.

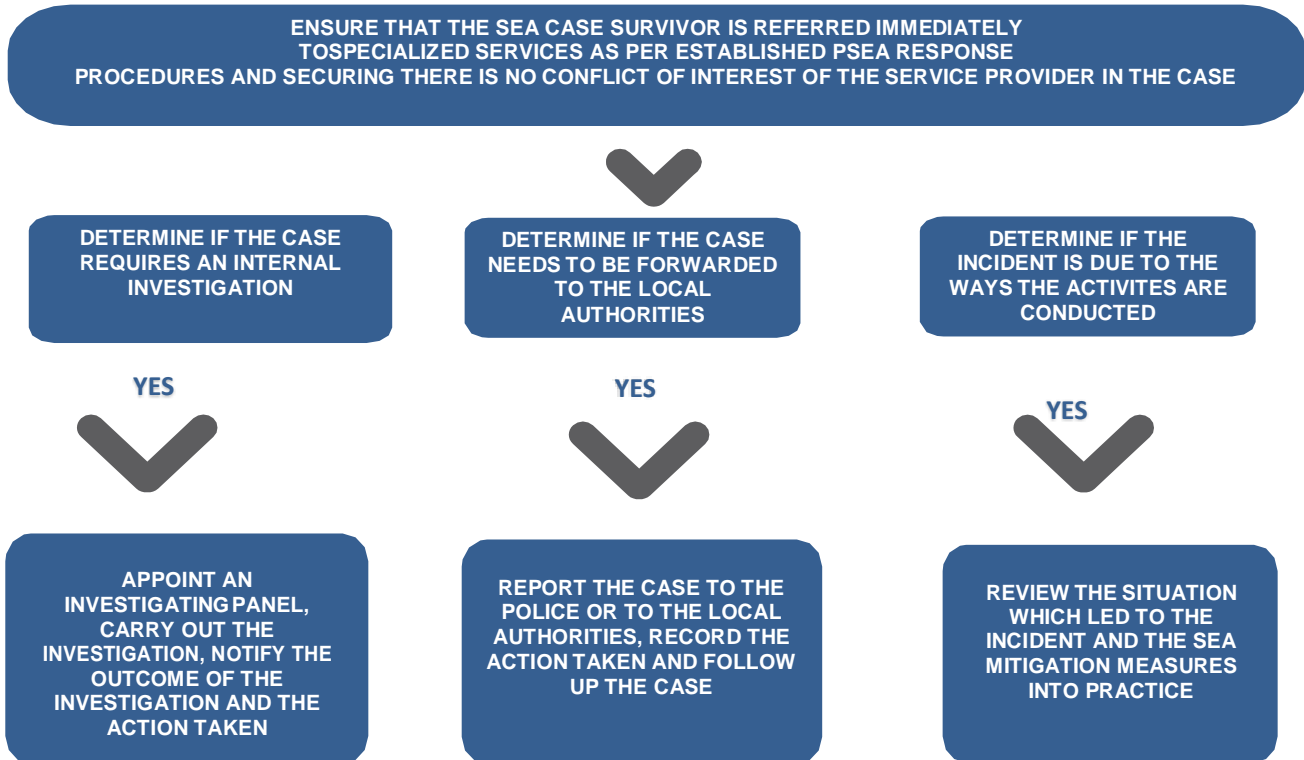
When SEA incidents involve AIDOS human resources, partners' staff or associates, considering that AIDOS may know the alleged perpetrator, referral to a third-party service provider is recommended even if AIDOS or one of its partners provide directly SEA case management services.

Where possible, the PSEA FP will be responsible to follow-up on the case together with the external specialized case management team, keeping the DLP up to date.

Investigation into SEA allegations:

When a case of SEA is determined as alleged SEA Incident Type 2, this needs to be handled in accordance with the procedures illustrated in the flowchart below.

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The PSEA FP will inform the DLP within 24 hours from when the incident is reported.

- The AIDOS human resource(s) involved will be immediately suspended on full pay and cease contact with beneficiaries until all investigations are completed. In the event of an allegation that involves a criminal offence, the subject of the complaint will be informed that, in addition to disciplinary action, the case may be forwarded to the appropriate local authorities, for further investigation.
- An initial clarification will be conducted by the PSEA FP, the area Programme Officer and the DLP (the Board will designate an independent investigator where one of these is implicated), who will record all information, investigate the facts and assess the condition of the survivor(s) within 48 hours, where possible.
- If the outcome of the initial clarification requires a full investigation, a panel composed by three members of the Board will be convened to carry out the investigation and determine whether the case is to be forwarded to the local authorities. The members of the investigating panel will commit to strict confidentiality (see **Annex B: Oath of Confidentiality for Investigators**), information will be limited to those involved in the investigation and documentation will be filed securely as per data protection protocols.
- The investigating panel will report to AIDOS board. All members of the AIDOS board who will be reviewing the case will also commit to strict confidentiality by signing the Oath of Confidentiality for Investigators.
- If the incident involves a personnel member of an AIDOS partner, then the DLP will raise the issue with the relevant person within the partner organization that must report back on how they are investigating and following up the case. It will be the responsibility of the AIDOS PSEA FP and the area Programme Officer to monitor this.

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- If the incident involves another development and/or humanitarian aid worker outside AIDOS and AIDOS partners, then the DLP will raise the issue with the relevant person within the entity the alleged perpetrator work for.
- If any AIDOS human resource or associate is found to have violated the PSEA Policy, the Code of Conduct and related standards of behavior, immediate action will be taken. This may include:
 - » **Staff** – disciplinary action, up to and including dismissal. International staff will be repatriated to their country of origin and police reports may be filed.
 - » **Volunteers, community committee members and interns** – termination of the collaboration with AIDOS.
 - » **Consultants** – termination of the collaboration contract with AIDOS. International consultants will be repatriated to their country of origin and police reports may be filed.
 - » **Partners** – if the SEA allegation is mishandled, withdrawal of funding/support and termination of the partnership agreement or sub-agreement with AIDOS. Depending on the type of SEA allegation, the instance may be reported to the Donor.
 - » **Contractors** – termination of the contractual agreement with AIDOS.
 - » **Visitors** – suspension of the visit and repatriation to their country of origin.
- For all categories of AIDOS human resources and associates, the case may be forwarded to the police or local authorities for prosecution where possible criminal acts have been committed. The decision of forwarding the case to the police or local authorities for criminal prosecution should be taken only if the survivor provides his/her informed consent and if found, after analyzing the risks, that this is in his/her best interests.
- The outcome of the investigation and the action taken will be recorded and stored as per data protection protocols.
- Adverse determination from an investigation should be open to challenge through an appeal to the AIDOS board.
- All parties concerned will be notified of AIDOS processes, the outcome of the investigation and the action taken in a timely manner.
- The media will be exclusively dealt with by the AIDOS Communication Unit at HQ, guided in their response at all times by the AIDOS Board.
- A review of the SEA risks identified and the SEA mitigation measures designed will be conducted, and new action set to further minimize the risks of SEA by AIDOS human resources and partners. This process needs to be conducted and documented within 2 weeks of the end of the investigation.
- A final report about the investigation and the action taken will be submitted to AIDOS board.

Reporting Follow up:

Reporting may result in disciplinary action for AIDOS human resources and in the immediate termination of the Partnership Agreement in case of AIDOS and partner organizations' human resources involved in the incident.

Depending upon the specific circumstances of the alleged SEA incident, the reporting person might be contacted by the services/organizations specialized in protection/abuse case management to whom the incident has been referred for additional information. AIDOS will make any effort to monitor the case referred, however it is also possible that the reporting person will not be informed of the results of the SEA concern/investigation that was initiated in response to the report.

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Confidentiality and data protection

Confidentiality of information is extremely important when working with SEA survivors and incidents and needs to be addressed with the utmost care. It is essential that all AIDOS human resources and associates understand the importance of this principle and ensure that the data protection and sharing protocols outlined below are adhered to. Any breach of the data protection and sharing protocols may be subject to disciplinary action, up to and including dismissal.

It is essential to maintain appropriate confidentiality and therefore sharing of information, which could identify a SEA survivor or an alleged perpetrator. However, confidentiality should not be promised to the persons reporting the abuse as this cannot be guaranteed (there may be requirements to report to relevant authorities according to the local Laws).

When survivors disclose personal information to AIDOS human resources, it is essential that AIDOS human resources understand that this information may be sensitive and ensure that such information is shared only on a need-to-know basis agreed with informed consent or assent and in the best interests of the survivor.

Information related to SEA incidents involving AIDOS human resources or partners, or other development and/or humanitarian aid workers, are particularly sensitive and will be shared only with the DLP or his/her Deputy who will take over the case and inform immediately the AIDOS board to discuss the way forward.

All materials pertaining to complaints and reports about alleged acts of SEA involving AIDOS human resources, partners' and/or other development and/or humanitarian aid workers, including the identity of the whistle-blower and the circumstances related to observation, suspicion or disclosure of the SEA incident, will be handled in strict confidence in order to protect the rights of all involved.

Each AIDOS Country Representative will be responsible to develop a data protection system for recording, storing and sharing data related to SEA survivors and incidents, and protect information, at the base and country level.

The following protocols need to be observed when handling data related to SEA survivors and incidents (including case files, photos and other personal details):

- Data will not be shared with any unauthorized person and will never reveal the identity or.
- For the purposes of case referral meetings or other support mechanisms, information about an individual survivor may be discussed but identifying information (including the name of the person affected) will NOT be disclosed to other organizations or government bodies.
- Where data needs to be shared for a specific purpose, authorization must be sought from the Project Manager in charge before such information is shared. Data should only be shared on a need- to-know basis and in the best interest of the survivor.

Annexes:

Annex A: Complaint/Incident Reporting Form

Annex B: Oath of Confidentiality for Investigators

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Annex A: Complaint/Incident Reporting Form

If you have seen an actual incident and/or suspect and have cause for concern regarding an incident of SEA, please fill out the form below where appropriate, identifying in the form whether it is an actual incident or an alleged/suspected incident.

<p>Country of Operation: Referral case number:</p> <p>About You: Your Name: _____ Your Job Title: _____ Workplace: _____ Your relationship to the SEA survivor: _____ Your relationship to AIDOS: _____ Line Manager/Supervisor (in case of AIDOS human resources filling the form): _____ Contact details: _____</p> <p>Signature _____</p>
<p>About the SEA survivor:</p> <p>Name: _____ Gender: _____ Age: _____ Nationality: _____ Village/Town: _____ Municipality/District: _____ Governorate/Region: _____ Country: _____ Contact details: _____</p>
<p>How did you know about the incident?</p> <ul style="list-style-type: none">• Direct observation• Suspicion• Disclosure of child• Disclosure of other person (Name _____)• Other (specify) _____

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Incident Details:

Is any AIDOS employee and/or related personnel, AIDOS partner's staff or any other development or humanitarian aid worker involved in the incident as perpetrator (Incident, Type 2) or witness? If yes, please provide details.

Date of the (alleged) incident: _____ Time of the (alleged) incident: _____

Location of the (alleged) incident: _____

Description of the (alleged) incident:

Was there any other person involved in the alleged incident, including witnesses?
If yes, please provide details.

Your Personal Observations on the survivor (Any physical injuries, emotional state or other observations, if applicable):

Alleged Perpetrator Details:

Name: _____

Sex: _____ Age: _____ Nationality: _____

Relationship with AIDOS (if applicable): _____

Position: _____

Details of AIDOS Focal Point receiving the form:

Name: _____

Position: _____

Line Manager/Supervisor: _____

Contact Details: _____

Signature: _____

Date: _____

Action Taken:**Follow up (if applicable):**

Signature: _____ Date: _____

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Annex B: Oath of Confidentiality for Investigators

I, the undersigned, hereby commit myself to exercise the utmost discretion with regard to my involvement in the investigation being conducted by AIDOS. I will hold secret all information known to me by reason of my activities on behalf of the investigating panel. I will not use such information for private gain, or to favour or prejudice any third party.

I understand that this declaration will remain in force after the completion of my assignment with the investigating panel. I also understand that divulging confidential information to persons who are not authorized to receive it may amount to misconduct, and that the signed original of this declaration will be held in the relevant investigation file.

Signature:

Name:

Position:

Role:

Place:

Date:

To be filled out by an investigator before whom the oath of confidentiality is taken:

Referral case number/Country of

Operation:Signature:

Name:

Position:

Role:

Place:

Date:

AIDOS PSEA Policy

ANNEX 3 – DECLARATION ON COMPLIANCE TO PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE

All AIDOS and partners' human resources¹¹ must uphold the highest standards of professional and personal conduct. At all times, all human resources must treat all people with respect and dignity.

Sexual Exploitation and Abuse (SEA) are acts of unacceptable behavior and prohibited conduct for all human resources. SEA damages the integrity and image of AIDOS and erodes confidence and trust in the Organization.

I will strictly comply with all of the provisions of the ST/SGB/2003/13¹², and with AIDOS PSEA policy that I have read and understood.

I acknowledge that it is strictly prohibited for all human resources to engage in:

- Any act of SEA, or other form of sexually humiliating, degrading or exploitative behavior;
- Sexual activity with children (persons under the age of 18) regardless of the age of majority or age of consent locally or in my home country. Mistaken belief as to the age of the child is no excuse;
- Sexual activity with anyone including sexual favors or other forms of humiliating, degrading or exploitative behavior, in exchange for money, food, employment, goods (including programme supplies), services, favors or any other benefit. This includes any exchange of assistance that is due to beneficiaries of assistance. Additionally, this also applies to any sexual activity with sex workers, whether or not prostitution is legal in my country or the host country;
- Sexual activity that is forced upon another individual;
- Use of a child or adult to procure sexual activities for others.

All AIDOS human resources must contribute to an environment that prevents SEA. AIDOS human resources are obligated to report allegations of SEA through the established reporting mechanisms.

Any SEA will be considered as serious misconduct. Allegations of SEA will be investigated and may lead to disciplinary measures, including termination of contract, and referral for prosecution.

Name: _____

Date: _____

Signature: _____

¹¹ The term "human resources" includes staff, volunteers, associates, consultants and other profiles, as well as partner organizations' human resources, who interact with beneficiaries in the context of AIDOS projects.

¹² From the UN Secretary General's Bulletin ST/SGB/2003/13, 2003. Available at: <https://undocs.org/en/ST/SGB/2003/13>