



# Prevention of Sexual Exploitation, Abuse, and Harassment Policy (PSEAH)

*Version 1.7*

**Prepared Date: September 2023**  
**Review Date: September 2025**



## 1. Introduction

**The Safa Education Welfare and Charitable Trust (TSEWCT)** is committed to ensuring that all beneficiaries, staff, volunteers, and stakeholders operate in a safe, respectful environment, free from any form of sexual exploitation, abuse, and harassment (SEAH). The Prevention of Sexual Exploitation, Abuse, and Harassment (PSEAH) policy aims to prevent, identify, and respond to any instance of SEAH in TSEWCT's operations. This policy reflects the organisation's zero-tolerance approach to SEAH and its commitment to maintaining ethical standards and safeguarding vulnerable individuals. As a member of Sphere India - National Coalition Humanitarian Agencies in India, this policy has been created by researching its best practices. Now, This policy will specifically operate under Indian laws,

- The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 (POSH).
- Indian Penal Code (IPC) Sections 354 and 509, which deal with sexual harassment.

## 2. Purpose

The primary purpose of the PSEAH policy is to prevent and respond to incidents of SEAH in all aspects of TSEWCT's operations. The policy seeks to:

- Ensure a safe environment free from SEAH for all stakeholders.
- Establish clear procedures for reporting and addressing SEAH incidents.
- Foster a culture of respect, dignity, and accountability across the organisation.
- Support survivors (a survivor is a person who has experienced sexual exploitation, abuse, or harassment) of SEAH with appropriate care, counselling, and legal services.

## 3. Scope

The PSEAH policy applies to:

- All employees, board members, direct or indirect consultants, contractors or partners appointed for TSEWCT.
- Beneficiaries and any individuals who engage with TSEWCT's programs and services.



- All activities, events, and programs under TSEWCT, including interactions with communities and individuals associated with the organisation.

### 3.1. Definitions

- **Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes.
- **Sexual Abuse:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Sexual Harassment:** Unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature that creates a hostile environment.

## 4. Committee Formation / Roles and Responsibilities

Establish a Safeguarding Committee (SC) to oversee the implementation of the PSEAH policy and manage any reported SEAH incidents. The SC will meet quarterly or as needed, based on incidents reported. The SC should include legal, human resources, and safeguarding experts to ensure a comprehensive and survivor-centred approach to addressing SEAH.

### 4.1 Roles and Responsibilities of SC Members:

#### Chairperson:

- **Role:** A senior representative of TSEWCT who leads the Safeguarding Committee.
- **Responsibilities:**
  - Ensure timely and effective investigation of SEAH complaints.
  - Maintain confidentiality and protect the dignity of all individuals involved.
  - Report on SC activities and outcomes to the Board of Trustees.

#### Members (Internal Employees):

- **Role:** Staff members selected for the Safeguarding Committee.
- **Responsibilities:**
  - Assist in investigating SEAH incidents and supporting survivors.
  - Ensure that safeguarding practices are upheld across all TSEWCT operations.
  - Participate in awareness-raising and training initiatives for staff and volunteers.



### **External Expert:**

- **Role:** An external advisor specialising in safeguarding and SEAH prevention.
  
- **Responsibilities:**
  - Provide objective guidance and oversight in complex SEAH cases.
  - Ensure legal compliance with national and international safeguarding standards.
  - Offer expert recommendations on SEAH prevention measures.
  
- If the SC members are directly or indirectly involved in a complaint, then an immediate temporary SC committee will be formed and strict action will be taken against them.
  
- The safeguarding committee will have its members changed every year to avoid any conflict of interest.
  
- **Code of Conduct for the Safeguarding Committee**
  - Confidentiality
  - Impartiality
  - Respect and Sensitivity
  - Timely Action
  - Compliance with the Law
  - Documentation
  - Fair Investigations
  - Survivor-Centred Approach
  - Non-Retaliation
  - Training and Awareness
  - Reporting to Leadership
  - Review and Continuous Improvement
  - Respect for Privacy
  - Accessibility and Transparency
  - Whistleblower Protection
  - Mental Well Being or Therapy

### **5. Policy and Guidelines**

Develop a clear PSEAH policy with procedures for identifying, reporting, and addressing incidents of SEAH. The policy must adhere to relevant legal frameworks and guidelines,



including the Protection of Children from Sexual Offences (POCSO) Act and other applicable safeguarding laws.

## **6. Regular Training for SC Members and Staff**

- Digital and Hard copies of training materials will be shared with all the members and staff. Additionally the material will be kept at all our offices.
- **Chairperson:** Attend advanced safeguarding training focusing on managing SEAH cases, trauma-informed care, and legal responsibilities.
- **Members (Internal Staff):** Participate in ongoing training to effectively identify and address SEAH incidents.
- **External Expert:** Engage in refresher courses on safeguarding laws and practices to ensure updated expertise.
- **Staff Training:** Ensure all existing and newly appointed employees, volunteers, and partners receive regular training on the PSEAH policy and their role in preventing SEAH.

## **7. Reporting Mechanism**

A standard reporting form (Annexure-I attached at the end of this policy) will be provided for SEAH complaints. Confidential channels, including anonymous reporting options, will be available to all stakeholders. A secure and confidential reporting system will ensure the privacy and safety of all involved.

The reporting should be done in a hierarchical manner where a complaint is first reported to the Chairperson and if there are no responses within a week, then the report should be sent to an External Expert. If there is no action after 15 days, the report should be given to legal authorities. All this to be done if the organisation internal mechanism fails.

## **8. Investigations and Resolution**

The Safeguarding Committee (SC) is responsible for conducting prompt, impartial, and confidential investigations of SEAH incidents. The investigation process includes:

- Collecting and reviewing testimonies and evidence from survivors, witnesses, and alleged perpetrators.
- Evaluating the severity of the incident and its impact on the affected individuals.



- Recommending appropriate actions, such as disciplinary measures or legal interventions.
- The investigations and resolutions will be processed and presented by the committee within 30 days of reporting of the incident.

## **9. Resolution and Redressal**

After the investigation, the SC will take necessary steps to resolve SEAH cases. Possible actions include:

- If found guilty, immediate termination of the perpetrator from TSEWCT.
- Based on the severity of the case, legal action if necessary will be taken in accordance with local laws.
- Support services to survivors, including counselling and medical care.
- Failure to comply with the PSEAH policy or failure to report SEAH will result in disciplinary actions, including termination.
- In case the accusations of the perpetrator are found false. The same action will be taken against the complainant.
- This policy will be used to protect all the parties involved and maintain fairness in resolution and redressal.

## **10. Confidentiality**

All information regarding SEAH incidents must be handled with strict confidentiality to protect the privacy and dignity of survivors, witnesses, and the accused. Only authorised personnel will have access to sensitive information.

## **11. Documentation**

Accurate and detailed records of all SEAH incidents, investigations, and resolutions will be maintained to ensure transparency and accountability. All documentation must comply with relevant data protection laws and be securely stored for a period of 10 years.

## **12. Annual Reports**

The Safeguarding Committee will submit annual reports to the Board of Trustees, detailing SEAH cases, actions taken, and any patterns or concerns identified. This ensures transparency and ongoing commitment to preventing SEAH. A formal anonymous feedback



from the staff will be included in the report to reflect the actions taken by the organisation for their safety and protection.

### **13. Legal Compliance**

Ensure that the PSEAH policy complies with all national and international laws related to sexual exploitation, abuse, and harassment. Legal advice will be sought when necessary to ensure the organisation's compliance with safeguarding regulations.

### **14. Preventive Measures**

Conduct regular (Quarterly or Annually) awareness programs, training, and workshops to promote a culture of respect and safety. Implement ongoing risk assessments to identify and address any vulnerabilities within TSEWCT's operations.

### **15. Regular Review**

The PSEAH policy and its implementation will be reviewed every two years based on the feedback from the survivors, staff, and external experts to ensure its effectiveness and relevance. Necessary revisions will be made based on new developments in safeguarding practices. An emergency review can be conducted by the SC if SEAH issues arise between regular review periods.

### **16. Conclusion**

This PSEAH Policy reflects our zero-tolerance approach to sexual exploitation, abuse, and harassment. Upholding this policy is critical to maintaining a safe and respectful environment for all.



## **Annexure-1**

### **PSEAH Incident Reporting Form**

#### **The Safa Education Welfare and Charitable Trust (TSEWCT)**

##### **1. Complainant Information**

- Name:
- Contact Information:
- Position/Role:
- Date of Submission:

##### **2. Incident Details**

- Date of Incident:
- Time of Incident:
- Location of Incident:
- Description of the Incident:

##### **3. Involved Parties**

- Names and positions of individuals involved in the incident (if known):

##### **4. Witness Information**

- Names and contact information of any witnesses to the incident (if applicable):

##### **5. Nature of Complaint**

- Specify whether the complaint pertains to sexual exploitation, abuse, harassment, or any related concerns:

##### **6. Supporting Evidence**

- Any supporting documentation, evidence, or relevant information related to the complaint (if available):

##### **7. Actions Taken**

- Any actions or responses taken by the complainant or others following the incident:

##### **8. Signature**

- Signature of the complainant and date of submission:

##### **9. Acknowledgment**

- A statement acknowledging receipt of the complaint and outlining the expected timeline for initial review and follow-up with the complainant:

The information provided in this form will be treated with the utmost confidentiality. It will only be accessed by authorised personnel involved in the investigation and resolution of the complaint. TSEWCT is committed to safeguarding the privacy of individuals involved in the complaint process. By including a robust confidentiality statement, TSEWCT can reinforce the trust and confidence of individuals in the complaint reporting process, fostering a supportive and secure environment for addressing PSEAH concerns.