



Striving for a healthy and inclusive society

**Prevention of Sexual Exploitation, Abuse,
and Harassment Policy**

2023

POLICY STATEMENT

Health Development Initiative (hereinafter HDI) is committed to providing a safe environment for all free from sexual exploitation, abuse and harassment. ***HDI has a zero tolerance policy for any form of sexual exploitation, abuse, or harassment (SEAH) in the workplace and in the course of work, treats all incidents seriously and promptly investigates all allegations. HDI defines zero tolerance as acting on every allegation in a fair and reasonable way with due reasonable way, while respecting the dignity of the survivor of SEAH.***

All complaints of SEAH are taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint. Reporters of SEAH, whether the survivor or a witness, are protected against retaliation under the Whistleblower Policy.

The PSEAH Policy outlines both expectations and requirements for HDI to manage the risk of SEAH and SEAH incidents, should they occur. Preventing SEAH (PSEAH) is a shared responsibility. All actors mentioned in the scope section below, must play an active role in addressing SEAH that occurs — only if all parties take action will we have meaningful change.

1. Definition

HDI subscribes to the following definitions of SEAH provided by the United Nations:

Sexual exploitation the 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.¹

Sexual abuse as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.²

Sexual harassment as any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another; especially when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.³

2. Scope

This policy applies to any person working with HDI regardless of gender, sexual orientation, position, working relationship with HDI, seniority, marital status or any other status. This policy protects employees, interns/fellows, volunteers, contractors, partners, board members, beneficiaries of HDI programmes, and anyone interacting with HDI. These groups are expected

to act in accordance with the principles and reporting, required and outlined in this Policy.

3. Preventive measures

Sexual exploitation, abuse and harassment are never acceptable. HDI recognizes that significant, lasting change takes time and with the appropriate prevention measures and response procedures, every employee at HDI will feel safe and validated. The following specific measures are taking at HDI to prevent SEAH incidents:

- At an institutional level, HDI understands that gender inequality and power imbalances increase the risk of SEAH. Furthermore, other inequalities, such as worker/beneficiary, ability/disability, gender identity, age, and sexual orientation can increase the risk of SEAH. HDI strives to put in place policies and measures to reduce these inequalities and power imbalances.
- HDI leaders must ensure that leadership set clear expectations and model respectful behaviour with regard to SEAH. This will support the survivors and witnesses to feel comfortable to report concerns.
- Prevention of SEAH is not possible unless every actor plays a role. HDI commits to ensure all contacts—including staff, interns, volunteers, independent contractors, partners, board members—fully understand and comply with the measures outlined in this policy.
- HDI will organize a mandatory training for each new employee, intern/fellow, volunteer, contractor, board member or partner as part of their orientation.
- Each year, HDI organizes at least one refresher training on PSEAH and existing reporting mechanisms for its employees, interns or fellows, contractors, board members and partners.
- HDI will strive to provide the survivor with comprehensive information, treat the survivor with dignity and respect, involve the survivor decision-making, and protect the privacy and confidentiality of the survivor. Survivor safety and well-being is paramount to reporting.

¹ United Nations Secretary General's *Bulletin on special measures for protection from sexual exploitation and sexual abuse* (ST/SGB/2003/13). This Bulletin was published on 9 October 2003.

²

Idem

³ United Nations Secretary General *Bulletin Prohibition of discrimination, harassment, including sexual Harassment and abuse of authority* (ST/SGB/2008/5). This Bulletin was published on 11 February 2008.

- All HDI employees, interns /fellows, volunteers, contractors, board members and partners must also seek guidance or further clarification from the disciplinary committee in case of doubt or confusion on any provision stipulated in the Policy.

4. Disciplinary committee

A disciplinary committee has been established with the mandate of handling all allegations of misconduct including sexual exploitation and abuse. The disciplinary committee is comprised of two HDI staff members elected by their peers and the HDI Legal Advisor, who is a member of the Board of Directors.

The disciplinary committee terms and election procedures are outlined in the Disciplinary Committee Procedures produced in 2021. In brief, disciplinary committee members hold term until the end of their contracts with HDI or until any other extenuating circumstance compels them to leave the committee. All members of the disciplinary committee have a duty to investigate incidents of SEAH, ensure prevention measures are being respected, maintain the SEAH reporting register and provide the survivor with all options for support.

The disciplinary committee may also invite an independent expert in the following circumstances:

- When a member of the committee has recused himself or herself to avoid a conflict of interest, such as being a close friend of the alleged harasser or the alleged survivor
- A member of the disciplinary committee is himself, herself or themselves subject to an investigation for committing sexual exploitation or abuse.

5. Reporting sexual exploitation and abuse

Any HDI employees, interns /fellows, volunteers, contractors, board members, beneficiaries, or partners who have experienced sexual exploitation or abuse are encouraged to either report to the disciplinary committee or to the Police. In case the survivor opts to report to the Police, he or she may inform HDI about it. HDI acknowledges that zero tolerance does not mean zero incidents. The reporting of incidents and responses is an indicator that the risk of SEAH is being managed appropriately.

Any HDI employee, intern /fellow, volunteer, contractor, board member or partner who witness an incident of SEAH or has other kinds of evidence has a responsibility to report the incident to the disciplinary committee. If in doubt, a report should be made on the alleged incident.

The report may first be made verbally, but must then be sent via the appropriate reporting channels including the HDI reporting email address: reporting@hdirwanda.org or the reporting misconduct complaint boxes located at all HDI locations.

6. Support to Survivors of Sexual Exploitation, Abuse and Harassment

HDI provides support to survivors of sexual exploitation, abuse and harassment in the workplace including psychosocial support, legal support, health services or referral to seek services at another facility.

HDI protects the privacy and confidentiality of the survivor and keeps all information regarding the incident confidential from those not directly involved in the allegation/investigation.

HDI will provide support to survivors of SEAH who have reported the incident to the police until the matter is resolved by providing existing evidence it may have in its possession. The survivor must be informed on the outcome of the internal investigation carried against his or her harasser/abuser.

7. Protection against retaliation

HDI will support employees, interns /fellows, volunteers, contractors, board members, beneficiaries, or partners who were either survivors of SEAH or have reported as witnesses a case of SEAH and will not take any adverse action against them, as stipulated in the whistleblower policy.

8. Sanctions and disciplinary measures

After internal or external investigation, anyone who has been found to have committed sexual exploitation, sexual abuse, or sexual harassment or any combination thereof under the terms of this policy is liable to disciplinary actions including dismissal without notice.

The following sanctions will be applied to those who condone SEAH by either failing to report the incident or assist the alleged perpetrator (harasser) in concealing evidence or threatening the survivor /survivor:

- verbal or written warning
- adverse performance evaluation
- suspension
- dismissal

HDI will terminate the contract of any employee, intern /fellow, board member, volunteer, partner or contractor who is found guilty in a court of law for committing SEAH against his or

her colleague, intern or fellow, board member, volunteer, partner, contractor or beneficiary of HDI programmes, even if HDI has not conducted its own investigation.

9. Implementation and dissemination

All HDI employees, interns /fellows, volunteers, contractors, board members or partners shall receive a soft copy of this policy via email and will be required to acknowledge its receipt. This policy is part and parcel of any contractual agreement between HDI and employees, interns /fellows, volunteers, contractors, board members or partners.