



**PREVENTION OF SEXUAL EXPLOITATION AND ABUSE**

**REVISED POLICY**

**ENDORSED BY: ISDP BOARD**

**02/09/2022**

**TO BE REVISED EVERY FOUR (4) YEARS**

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## DEFINITION OF TERMS

<b>Term</b>	<b>Definition</b>
<b>ISDP Employees and Related Personnel/clients</b>	The term “ISDP Employees and Related Personnel/clients” includes board members, volunteers, contractors, interns, international and local consultants and casual workers.
<b>Sexual Harassment</b>	Sexual harassment is any unwelcomed 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.
<b>Sexual Exploitation</b>	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. ISDP recognizes that the terms sexual abuse and exploitation represent a wide spectrum of behaviors and is not limited to the act of sexual intercourse.
<b>Sexual Abuse</b>	The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
<b>Child Sexual Abuse:</b>	When a child is used by another child, adolescent or adult for his or her own sexual stimulation or gratification. Sexual abuse involves contact and non-contact activities which encompasses all forms of sexual activity involving children, including exposing a child to online child sexual exploitation material, or taking sexually exploitative images of children.
<b>Survivor:</b>	The person who has been the subject of sexual harassment, abuse or exploitation.
<b>Complainant:</b>	The person who raises a complaint (this may or may not be the survivor).
<b>Subject of Complaint/Subject of Concern/ SoC:</b>	The person against whom the allegation, complaint or concern has been raised.
<b>Suspicion of misconduct</b>	A concern that has been raised through any of the reporting pathways. This suspicion is assessed at an initial case conference / stakeholder panel.
<b>Allegation of misconduct:</b>	If, at case conference / stakeholder panel stage there is a decision to investigate the suspicion of misconduct then it is treated as an 'allegation of misconduct'.
<b>Outcome of Investigation</b>	Once an allegation is investigated and the investigation report is reviewed, the resulting recommendations are referred to as the ‘outcome of investigation’.

## SCOPE AND PURPOSE

This policy applies to all ISDP Employees and Clients (Volunteers and contractors) both during and outside normal working hours. This policy sets out ISDP's approach to preventing and addressing sexual exploitation and abuses. This includes:

- ISDP is committed to understand better, improve and prevent SEA (sexual exploitation and abuse) ensuring effective action is taken when PSEA related problems occur.
- Contribute to increased responsibility on setting up appropriate approach to people affected with PSEA.
- ISDP PSEA Principles will be a base for decision making and actions

## 2. POLICY STATEMENT

**Definition of SEA:** Sexual exploitation” is 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. “Sexual abuse” is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes non-contact and online sexual exploitation and abuse.

ISDP has a zero-tolerance towards sexual harassment, exploitation, and abuse. At ISDP, we believe all people have a right to live freely from sexual violence and any abuse of power regardless of age, gender, sexuality, sexual orientation, disability, religion or ethnic origin. We recognize that there are unequal power dynamics across the organization and in relation to those we serve, and that we face risk of some people exploiting their position of power for personal gain. ISDP will not tolerate its employees, volunteers, consultants or any other representative associated with the delivery of its work carrying out any form of sexual exploitation and/or abuse. ISDP commits to supporting survivors, improving safeguarding capacity, reporting, investigating, responding to, and preventing sexual harassment and sexual exploitation and abuse. ISDP employees, volunteers and contractors will comply with this Policy in conjunction with national laws to make decisions about how to respond to any PSEA complaints and concerns raised. Other related ISDP policies include;

- ISDP Code of Conduct.
- Child protection policy
- Human Resource Policy

### 3. ISDP PSEA PRINCIPLES AND COMMITMENTS

ISDP is committed to achieving full, ongoing implementation of the Six Core Principles relating to Sexual Exploitation and Abuse by the Inter-Agency Standing Committee (IASC) Working Group on prevention and Response to Sexual Exploitation and Abuse.

#### 3.1 ISDP's Core Principles on PSEA

This PSEA policy will apply in relation with existing national laws. In ISDP's operation in Somalia where this policy contravenes with the local legislation, this must be taken into account with guidance from the respective actors. ISDP employees and Clients includes anyone with a contractual link to ISDP, including interns, volunteers, consultant and contractors,

The six Core Principles quoted from the UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13) have been modified and localized by ISDP to address sexual harassment reported from "ISDP Employees and its clients".

1. Sexual exploitation and abuse by ISDP Employees and its clients constitute acts of gross misconduct and are, therefore, subject for termination of employment or contract/agreement and other relevant disciplinary actions including downgrading and warning.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of their maturity or age of consent locally and mistaken belief in the age of the child is not a defense.
3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior by ISDP Employees and its clients are prohibited at all times.
4. Sexual relationships between ISDP Employees or clients including beneficiaries are forbidden. Given the contexts where ISDP operates, such relationships may be based on inherently unequal power dynamics and may undermine the credibility and integrity of ISDP's relief and development work.
5. Where ISDP Employee or its Clients develops concerns or suspicions regarding sexual abuse or exploitation or sexual harassment by a fellow worker, he or she must immediately report such concerns via the established reporting mechanisms.
6. ISDP and its Clients are obliged to create and maintain an environment that prevents sexual exploitation and child abuse that promotes the implementation of this Policy. ISDP Managers at all levels have particular responsibilities to support and develop systems, which maintain this environment.

## 3.2 ISDP's Commitments

ISDP is dedicated to fulfilling the following commitments to prevent and respond to sexual exploitation abuse and sexual harassment as highlighted in the six Core Principles above.

### 3.2.1 Safe Organizational Culture:

ISDP will make every effort to create and maintain a safe organizational culture for all those who work for and with ISDP, as well as those in the communities where ISDP operates through robust prevention and response work, offering support to survivors, and holding those responsible for sexual harassment, exploitation or abuse to account. ISDP will consider questions related to SEA cases during the staff recruitment process and awarding contract to contractors to know the attitude of the applicants. In addition, ISDP will gather background information about the incumbent about his previous experiences through the reference checklist. Upon joining ISDP, every staff will be scheduled for induction session on policy to prevent sexual abuse and exploitation. Annual refresher training on the PSEA policy is mandatory for every staff.

### 3.2.2 Reporting SEA:

- a) ISDP has compliant and response mechanisms that beneficiaries'/survivors can have access to report. The existing phone number is **+252907791538** and it's under the custody of ISDP PSEA focal person. Community is given awareness and information on how to use the CRM and in case of reporting PSEA cases which are exclusively confidential and appropriate support will be provided.
- b) Ensure that we have multiple channels for ISDP Employees, Related Personnel, beneficiaries, and others to safely report sexual exploitation and abuse and sexual harassment. These channels should be designed in consultation with local communities and staff to ensure that they are safe and accessible.
- c) To proceed with the reported case, the survivor is required to give her/his own consent if she/he is an adult. In case of children, the parent or guardian can give the consent.
- d) Ensure that complainants are providing gender option (male or female) for their comfort and convenience to report their case. One male and one female staff member safeguarding focal points must be assigned to this effect.

### 3.2.3 Confidentiality

Complaints can be made anonymously. Every effort will be made to maintain confidentiality throughout the complaints process. Information that identifies individuals involved in a complaint will be limited to essential personnel and will not be shared further without obtaining the informed consent of those involved, except if someone's life is at risk, a child is at risk, or as required by law in consultation with legal counsel and where safe to do so. Non-identifying information will be shared as per reporting requirements. Staff involved in the complaints process will be made aware of the importance of maintaining confidentiality and may be asked to sign a confidentiality agreement. Employees who breach confidentiality may be subject to disciplinary action including termination of employment.

### 3.3 Responding to SEA Reports:

- 1) ISDP will respond in a professional and timely manner to all concerns or allegations of sexual harassment, exploitation or abuse. All concerns or allegations will always be taken seriously, investigated and acted upon where appropriate, in line with our safeguarding principles listed below.
- 2) Robust and accountable case management: All allegations of SEA, and subsequent follow-up, will be documented in a secure and confidential database to ensure accountability.
- 3) The report will be officially acknowledged within 24 hours, and a safeguarding team will convene a case conference to assess immediate risks. The survivor must receive prophylaxis **treatment within 72 hours without waiting for investigation process.**

Below is the list of SEA service providers in ISDP operational areas.

<b>Relevant service providers</b> <b>Location: BOSASO, DISTRICT PUNTLAND-SOMALIA</b> <b>The following actors are providing services to children and their families / caregivers in the area covered by these SOPs. These services have direct and indirect impact on the lives of children and their families / caregivers</b>			
Regions	Name of Actor/Organization	Service(s) Provided	Location, Name and Contact Details of Focal Point
Bossaso, Bari	ISDP	<ul style="list-style-type: none"> <li>• Medical Services Provided Health Centers in Bossaso, Bari Region Tur-Jalle Health Center</li> <li>• Shallabelle Health Center</li> <li>• Isniino Health Center.</li> <li>• Boqolka Bush Health Center</li> </ul>	Focal Point Person: Farhia Abdiwahb Mohamed  Telephone Number: +252907791726
Bossaso, Bari	Ministry of Women Development and Family Affairs (MOWDAFA)	Central Police Station Bossaso Law Court Ministry of women and family affairs MOWDAFA	Focal Point Person: Ayaan nuur Muse Telephone Number: 0907745983
Bossaso, Bari	<b>Save the Children</b>	Psychosocial support and case management in general hospital bossaso	Focal Point Person: Fatima Abdullahi Osman Telephone Number: 090 7757950
Bossaso, Bari	<b>Care International</b>	Case management Bossaso General Hospital	Focal Point Person: <b>Faadumo Abdisalan Mahmoud</b> Telephone Number: <b>0907731685</b>

#### 3.3.1 Receiving Complaints about External Organizations/Bodies

Safeguarding complaints raised to ISDP about other organizations/bodies should be referred to the teams, who will report cases to the relevant organizations involved where safe to do so, as well as local PSEA working groups, networks, and/or the charity commission/police/donors where appropriate and safe to do so. ISDP will not investigate cases related to other organizations, but does have an obligation to report.

#### 4.0 Investigations/PSEA report handling procedures

ISDP will apply the following procedures and steps in handling cases related PSEA

- a) ISDP should start its investigation planning immediately upon receipt of a report SEA incident.
- b) ISDP will mobilize disciplinary committees lead by ISDP PSEA focal point person and

other necessary resources for the investigation.

- c) The case management committee should prepare work plan that indicates the methodology of investigation and required resources along with time frame.
- d) The committee must outline the questions to be asked for the survivors and witnesses (if applicable) before the commencement of the investigation
- e) ISDP will carry out safe and discreet investigations, through disciplinary committee working with ISDP's Safeguarding Team, recognizing the rights of and duty of care to everyone involved, including the complainant and/or survivor, witnesses and the subject of complaint (SoC).
- f) Documentation of the nature of the case investigated must be put in place
- g) Ensure possible action is taken, reported and documented.
- h) Sharing action taken and final report for decision making to relevant stakeholders.
- i) Follow up investigation results and actions taken

#### 5.0 Accountable decision-making:

ISDP will take swift and appropriate action against those who are found to have committed SEA. This may include administrative or disciplinary action, and/or referral to the relevant police and security authorities in area of incident if appropriate and safe to do so. An independent and gender representative decision-making panel will be assigned in every investigation to ensure impartiality, transparency, and accountability

#### 6.0 Support and Care of survivors:

In order to provide support service to survivors ISDP ensures the following steps and procedures are followed;

- ✓ Receiving PSEA reports
- ✓ Keeping confidentiality
- ✓ Case assessment and management
- ✓ Facilitate support for legal services
- ✓ Provide medical support
- ✓ Reporting, follow up and closure of the case with confirmation from the survivor.

Survivors of SEA are entitled to support services that include:

- a) Counselling/psychosocial support
- b) Referrals to relevant hospitals
- c) Provision of dignity kits
- d) Reporting PSEA cases to police department where appropriate

#### 7.0 Embedding PSEA into ISDP work.

##### 7.1 Safer Recruitment:

In compliance with ISDP HR policy, ISDP is committed to prevent perpetrators of SEA from being (re)hired or (re)deployed. Managers and Human Resource teams will ensure robust recruitment screening processes for all personnel, including employees, volunteers, consultants and other representatives.

##### 7.2 Contractual Agreements:

ISDP will ensure that, when engaging third parties, sub-contractor sub-recipient agreements, these agreements:

- ✓ Incorporate this Policy as an attachment;
- ✓ Include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to abide by a Code of Conduct along with this PSEA policy.

### 7.3 Staff/partner training and awareness raising

- ISDP Provides training and information to all ISDP Employees and Related Personnel, particularly focal points for receiving complaints, to ensure they understand their obligations and how to discharge their duties should they receive a complaint. A particular emphasis should be made on confidentiality.
- There is annual mandatory refresher training on the PSEA policy and procedure applied in the training include but not limited to the following;
  - i. Video presentation
  - ii. Training handouts
  - iii. Posters
  - iv. Case studies
  - v. Use of power point presentation
  - vi. Group discussions
  - vii. Use of information, education, communication materials (IEC materials)
- Ensure that everyone who works on behalf of ISDP and those we serve have information about how to access these safe reporting channels.
- This should include posting reporting procedures in local languages and regularly explaining these channels.

### 7.4 Beneficiary Accountability:

ISDP commits to promoting accountability towards our beneficiaries and the communities where we work by:

- 1) Being transparent about programming, activities, and services beneficiaries are entitled to;
- 2) Raising awareness on ISDP; s PSEA policy and reporting channels (complaint mechanisms are made available in project locations)
- 3) Actively seeking feedback from communities on ISDP's work, individual behaviors, and complaints; and
- 4) Presenting feedback to communities on what changes have been made resulting from community feedback – ideally by a senior ISDP representative. The above steps should occur regularly throughout the lifecycle of the program or activity.

### 7.5 Safe Programming:

ISDP Employees and Related Personnel are required to take proactive measures to avoid causing inadvertent harm to civilians, contribute to actively reduce existing threats and ensure programs are conflict sensitive. This includes embedding good practice and SEA prevention measures throughout the program and project cycle, including project design, grant proposals, assessments, complaints and feedback mechanisms, and monitoring and evaluation.

***Declaration statement:***

I, Mahad Omar Hersi ISDP Executive Director hereby declare that I have received the PSEA and that it is my sole responsibility and duty to read and understand the PSEA, which is an integral part of my employment or service terms and conditions. In carrying out my duties and assignments, I will act with complete integrity.

I promise to follow the PSEA Policy Rules and Regulations, and if for any reason ISDP fails to meet any of PSEA requirements, I will not use ignorance or a lack of understanding as an excuse, but will use the organization's policies to remedy that. I also agree that the ISDP board/senior management has the absolute right to take action in the event of a violation of any policy including the PSEA.

Name: Mahad Omar Hersi

Title: Executive Director

Signature:

 

Date 02/09/2022

Annex 1: Speak up channel

S/No	Channel Focal person	Email address	Telephone
1	PSEA and Safeguarding focal person	moh.guray@isdpsom.org	+252907710281
2	Office Administrator	info@isdpsom.org	+252907791538
3	Human resource department	hr@isdpsom.org	+252907795532

Name: Mahad Omar Hersi

Title: Executive Director

Signature:



Date 02/09/2022



Annex 3: ISDP REFERRAL FORM

<p><b>ISDP Referral Form</b>  <i>Specialized Services for survivors of GBV</i></p>
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Priority:	Referred via:	Referral Date:
<input type="checkbox"/> High ( <i>Follow up requested within 24 hours</i> ) <input type="checkbox"/> Medium ( <i>Follow up within 3 days</i> ) <input type="checkbox"/> Low ( <i>Follow up within weeks</i> )	<input type="checkbox"/> Phone: <input type="checkbox"/> Email: <input type="checkbox"/> In Person:	

Referred To:	Referred By:
Agency/Clinic: Name of the staff: Address:  Phone: Email: Contact:	Agency: Name of the staff: Address:  Phone: Email: Contact:

Survivor Information: (All personal information is OPTIONAL depending on level of detail the client consents to disclose) Note: For all external referrals, the use of survivor codes instead of names should be discussed and agreed by all actors.		
Name/Survivor Code:	DOB:	Displacement status:
Address:	Sex:	Language:
Phone:		

If the survivor is a child (below 18)	
Name of primary caregiver:	Contact information for caregiver: _____/_____
Relationship to child:	
Caregiver is informed of referral? <input type="checkbox"/> Yes <input type="checkbox"/> No (If no, explain) _____/_____	

Background Information/Reason for Referral: (problem description, duration, frequency, etc. only relevant for the referral)

Services already provided: (include any other referrals made – limited to information only relevant for the referral)		
Agency	Support	Date (incl. ongoing)

## ISDP Referral Form

### *Specialized Services for survivors of GBV*

#### Services Requested:

- |   |  |
|---|--|
| <input type="checkbox"/> HEALTH: Clinical Management of Rape (CMR)<br><input type="checkbox"/> Specialized psycho-social support<br><input type="checkbox"/> HEALTH: Treatment of injuries<br><input type="checkbox"/> Case Management<br><input type="checkbox"/> HEALTH: other medical care<br><input type="checkbox"/> Livelihood/Education<br><input type="checkbox"/> Legal Counseling /assistance | <input type="checkbox"/> Material assistance<br><input type="checkbox"/> Protection interview/services<br><input type="checkbox"/> Safe Shelter<br><input type="checkbox"/> Care arrangements<br><input type="checkbox"/> Civic documentation<br><b>Provide additional explanation here:</b> |
|---|--|

#### ADDITIONAL SPECIFIC NEEDS of the SURVIVOR

- |  |   |
|--|---|
| <b>Child</b><br><input type="checkbox"/> Child not attending school<br><input type="checkbox"/> Teenage Pregnancy<br><input type="checkbox"/> Child spouse<br><input type="checkbox"/> Child mother<br><input type="checkbox"/> Child engaged in worst form of child labor<br><input type="checkbox"/> Child formerly associated with armed forces/armed groups<br><input type="checkbox"/> Unaccompanied/separated child<br><input type="checkbox"/> Child living with disability | <b>Woman</b><br><input type="checkbox"/> Pregnant<br><input type="checkbox"/> Woman head of household<br><input type="checkbox"/> Woman living with disability<br><br><b>Provide additional explanation here:</b> |
|--|---|

#### IMPORTANT

- Also refer the case to the lead GBV Case Management agency in the location/camp if
- You are unsure how to support a particular person,
  - Immediate physical security options (including relocation) are required,
  - Best Interest Assessment (BIA/BID) for a child is necessary
  - Police/Legal Action is required
  - Emergency protection cash assistance for transport is necessary

#### Consent to Release Information (Read with survivor and answer any questions before s/he signs below)

I, \_\_\_\_\_, understand that the purpose of the referral and of disclosing this information to \_\_\_\_\_ is to ensure the safety and continuity of care among service providers seeking to serve this family/person. The service provider, \_\_\_\_\_, has clearly explained the procedure of the referral to me and has listed the exact information that is to be disclosed. By signing this form, I authorize this exchange of information.

Signature of Responsible Party: \_\_\_\_\_

Date: \_\_\_\_\_

#### Details of Referral:

Survivor has been informed of referral?  Yes  No (If no, explain) \_\_\_\_\_

If consent has not been signed (especially if referral from hotline), survivor has been explained the process and has verbally consented to release information?  Yes  No

Any contact or other restrictions?  Yes  No (If yes, explain) \_\_\_\_\_

#### Receiving Organization:

Referral received by: \_\_\_\_\_

Response provided to referring agency by: \_\_\_\_\_

Date: \_\_\_\_\_

Time: \_\_\_\_\_

Date: \_\_\_\_\_