Protection from Sexual Exploitation and Abuse (PSEA) Policy

Updated: January 2026

Next Revision Date: January 2027

PURPOSE OF POLICY

Within Camara Education, we believe in the inherent rights, freedom, dignity and equality of all individuals, particularly children. As laid out within our safeguarding policy, we are committed to creating and proactively maintaining an organisational culture and operational environments which prevent and deter any actions and omissions, whether deliberate or inadvertent, that place anyone at risk of any kind of abuse.

This policy, which should be considered alongside our Safeguarding Policy, sets out our commitment and responsibility to prevent any form of sexual exploitation and abuse both within the organisation and externally in all activities our staff are involved with. This PSEA policy ensures that procedures are in place to protect everyone we work with from any form of sexual abuse, exploitation or any other inappropriate behaviour, carried out by any member of our team.

POLICY OBJECTIVE

- To provide an understanding of what is defined as sexual exploitation and abuse
- To promote a policy of zero tolerance for sexual exploitation and abuse (SEA) for all Camara Education employees and related personnel and ensure that roles, responsibilities and expected standards of conduct in relation to SEA are known within the organisation
- To promote good practices and expected behaviour from staff and can serve as a preventive tool
- To create and maintain a safe environment, free from SEA, by taking appropriate measures for this purpose, internally and in the communities where Camara Education operates, through robust prevention and response work

POLICY STATEMENT

Sexual exploitation and abuse (SEA[1]) are violations of universally recognised international laws and rights and are acts of unacceptable behaviour and prohibited conduct for all individuals and associates working with Camara Education. Camara does not tolerate any form of sexual exploitation and abuse.

Camara Education holds a zero-tolerance organisational culture towards SEA and will strictly adhere to the standards of conduct outlined in Section 3 of the UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse[2]. The management of Camara Education are committed to creating and maintaining a safe environment free of sexual exploitation and abuse by providing clear direction, training and guidance in relation to this policy as well as a commitment to ensure the policy is enforced and adhered to within the organisation so that the rights of all individuals are protected. All Camara employees and related personnel are expected to uphold the highest standards of personal and professional conduct at all times, to treat all individuals with respect and dignity, and to provide our services and activities in a manner that respects and fosters the rights of project beneficiaries and other vulnerable members of the local communities.

Camara SEA policy sets out minimum standards to protect beneficiaries and community members from sexual exploitation and abuse. This policy outlines Camara Education's approach to preventing and responding to SEA. We are committed to ensuring that all concerns or reports that indicate a potential violation of this policy, our Child Protection and Safeguarding Policy or any other relevant policies are thoroughly investigated and reported to relevant authorities for follow up when necessary.

Who does this policy apply to;

- All individuals and related personnel[3] working with Camara Education HQ and Camara Education Country Offices including;
    - Camara's Board of Directors and Management at all levels
    - All employees, interns and volunteers in all Camara structures and offices
    - All persons associated with or working on behalf of Camara Education
- Staff and volunteers from other organisations that Camara Education partners with
- Anyone else who is working voluntarily or has a contract with Camara but is not in the above categories is also subject to this policy

[1] *Adopted from the UN Secretary General's Bulletin ST/SGB/2003/13, 2003.* https://undocs.org/en/ST/SGB/2003/13

[2] *Available at:* https://undocs.org/en/ST/SGB/2003/13

[3] *Camara's "**related personnel or associates**" include, for example, sub-contractors, donors, suppliers, consultants, interns, volunteers, as well as entities and their staff who have partnership or contract agreements with Camara Education HQ or Camara Education Country Offices.*

DEFINITIONS OF Sexual Exploitation and Abuse (SEA)[4]:

The UN Secretary General's Bulletin on Protection from Sexual Exploitation and Abuse (2003) defines SEA as:

Sexual exploitation: '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: 'The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions'

Examples of behaviours and actions that could be considered sexual exploitation and abuse:

- Inappropriate touching, by force or under unequal or coercive conditions
- Sexual assault and rape
- Threatened or actual non-physical intrusion including unwanted and/or uninvited exposure to pornography, texts, images
- Forcing or requesting for anyone to watch or touch inappropriate body parts
- Requesting or sharing sexualised images or sexually explicit texts
- Using sexualised or derogatory language towards someone for personal satisfaction or gain
- Suggesting, requesting or undertaking any sexual or sexualised acts, in exchange for something such as money, goods, services or opportunities
- Developing relationships with those in positions of vulnerability or inequitable power, with the intention of manipulating these relationships into sexualised dynamics in the future
- Any form of sexual act or request towards any child or young person under the age of 18

Sexual Harassment versus SEA: SEA occurs against a beneficiary or member of the community, whereas, Sexual harassment occurs between personnel/staff, and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. Sexual harassment is not covered by this policy but is well-articulated in Camara Safeguarding policy.

[4] *Both definitions are adopted from the UN Secretary General's Bulletin ST/SGB/2003/13, 2003.* https://undocs.org/en/ST/SGB/2003/13

SIX CORE PRINCIPLES TO BE ADHERED TO AT ALL TIMES [5]:

In line with the UN Secretary General's core standards relating to SEA, Camara Education have adopted these 6 principles which provide the overarching guidelines for our PSEA policy and framework;

1. Sexual exploitation and abuse by Camara employees and related personnel constitute acts of gross misconduct and are therefore grounds for disciplinary actions and/or termination of employment contracts within the applicable and current regulations

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 defence and in no way should ignorance of the age of the person be accepted as a justification. Camara's Children Protection and Safeguarding Policy[6] further establishes the principles, operational procedures, and guidelines for ensuring children's safeguarding in all domains of Camara action

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

4. Sexual relationship between Camara staff 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 the work of Camara

5. Where a Camara staff member or related personnel develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether the individual works for Camara or related personnel, he or she must report such concerns via established reporting mechanisms

6. All Camara employees, whatever their levels, are obliged to create and maintain an environment which prevents SEA and promotes the implementation of this policy. Management at all levels have particular responsibilities to support and develop systems which maintain this environment

The standards set out above are not intended to be an exhaustive list. Other types of sexually exploitative or sexually abusive behaviour may be grounds for administrative action or disciplinary measures, including summary dismissal, pursuant to the Camara Code of Conduct and other policies.

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[5] *IASC Six Core Principles Relating to SEA, 2019:* https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse *Modified for the purposes of this PSEA policy*

[6] *Camara Education Children Protection and Safeguarding Policy modified for the purposes of this PSEA policy.*

PSEA Framework:

As an organisation, our commitment to PSEA means there are various requirements which need to be undertaken to initially try to prevent any potential concerns arising but also that we are fully compliant in our response if any issues do arise:

PREVENTION

- ***Vetting:*** Camara systematically vets all prospective job candidates in accordance with established screening procedures. Camara undertakes police clearance checks on all new staff coming into the organisation and ensures all personnel receive updated clearance certificates annually. These should be kept within the staff HR file

- **Adherence**: Ensure that all personnel review and sign Camara Education's Protection against Sexual Exploitation and Abuse Policy on an annual basis. Signed acknowledgement of these reviews and agreement to adhere to the policy should be kept within the staff HR file

- **Training:** Provide personnel with required PSEA training to ensure they have sufficient knowledge and understanding around what is considered sexual exploitation or abuse, signs to be aware of, expectations around their own behaviour and processes to be followed if any concerns or disclosures are raised. Camara holds mandatory induction and refresher trainings[7] for all employees and related personnel on the Camara's SEA policy and procedures

RESPONSE:

- **Reporting:** Camara has safe, confidential, and accessible mechanisms and procedures for personnel to report SEA allegations and ensures that beneficiaries are aware of these. It is the duty of all Camara Personnel who become aware of any breaches to this Policy or who have any concerns to report them immediately to the Safeguarding Focal Point Person, and/or the Camara Country Lead and the Head of Africa Operations, through the established reporting procedure detailed below.

  The reporting procedure for dealing with disclosures, concerns or allegations of SEA is outlined in the following steps:
  - The employee or volunteer who has received a disclosure of SEA or who has concerns of abuse, should bring it to the attention of the Safeguarding Focal Point Person (FPP) within Camara
  - All such concerns must be recorded and the record held in a secure location

[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 employees and related personnel are required to take (i.e. prompt reporting of allegations).

- **Investigation:** Camara has set protocols to properly inform the appropriate authority which is responsible for conducting investigations for sexual exploitation and abuse allegations in respect of national and foreign legislation
- **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

ACTION TO BE TAKEN

Camara Education's zero tolerance to SEA means that any failure to comply with this policy will be dealt with very seriously. Depending on the outcome of investigations undertaken, any or a number of the following actions may be taken

- Termination of contract
- Referral for criminal prosecution
- Appropriate record of the concern kept on file for future reference

Cooperative arrangements:

- All Camara Education contracts and partnership agreements include a standard clause requiring contractors, suppliers, and partners to commit to a zero-tolerance policy on SEA and to take measures to prevent and respond to SEA
- The failure of those entities or individuals to take preventive measures against SEA, to investigate allegations thereof, or to take corrective action when SEA has occurred, shall constitute grounds for termination of any cooperative arrangement

Commitment to PSEA:

- Camara will make every effort to create and maintain a safe environment, free from SEA, and shall take appropriate measures for this purpose in the communities where it operates, through a robust PSEA framework, including prevention and response measures[8]
- This PSEA framework, affirms Camara's 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 SEA[9]

[8] *Adopted from Guidelines to implement the Minimum Operating Standards for PSEA* *https://interagencystandingcommittee.org/sites/default/files/migrated/2021-06/PSEA%20MOS%20Guidelines%202013.pdf*

[9] IASC Six Core Principles to SEA, 2019: https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse

References

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    a. https://www.un.org/preventing-sexual-exploitation-and-abuse/sites/www.un.org.preventing-sexual-exploitation-and-abuse/files/un_protocol_on_sea_allegations_involving_implementing_partners_en.pdf
3. Training - https://agora.unicef.org/course/info.php?id=7380
4. Guidelines to implement the Minimum Operating Standards for Protection from Sexual Exploitation and Abuse by UN and non-UN Personnel
    a. https://interagencystandingcommittee.org/sites/default/files/migrated/2021-06/PSEA%20MOS%20Guidelines%202013.pdf
5. CESVI SEA policy - https://www.cesvi.org/wp-content/uploads/2018/08/PSEA-Policy.pdf
6. In-country PSEA Focal Point, Generic Terms of Reference (ToRs), 2021
    a. https://interagencystandingcommittee.org/accountability-and-inclusion/country-psea-focal-point-generic-terms-reference-tors-2021
7. Minimum Operating Standards - Protection from Sexual Exploitation and Abuse by own Personnel
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8. Secretary-General's Bulletin Special measures for protection from sexual exploitation and sexual abuse
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SEA INCIDENT REPORT FORM

WHO? (The name of the individual this report is about and details of who is involved)

WHEN? Date and time of incident

WHERE? Incident location (attach map / sketch / diagram if necessary)

WHAT HAS HAPPENED? Description of incident

WHAT HAVE YOU DONE ABOUT IT AT THIS POINT?

WHAT ARE THE NEXT STEPS REQUIRED?

ADD ANY OTHER IMPORTANT INFORMATION HERE?

WHO ARE YOU REPORTING THIS CONCERN TO? (name and contact details)

Name: Signature:
Position: Date: