

Direct Aid Protection from Sexual Exploitation and Abuse Policy-PSEA



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1. Introduction and Purpose

At Direct Aid, we are committed to fostering a work environment that is inclusive, respectful, and free from discrimination and harassment. This Anti-Discrimination and Harassment Policy outlines our organization's unwavering dedication to promoting equality, diversity, and a safe workplace for all individuals associated with Direct Aid, including employees, volunteers, beneficiaries, and stakeholders.

The purpose of this policy is to:

- Establish a culture of respect and dignity: We believe that every person deserves to be treated with respect and dignity, regardless of their race, color, gender, age, religion, sexual orientation, disability, or any other protected characteristic. This policy serves as a foundation for fostering a culture that values diversity and promotes inclusivity in all aspects of our work.
- Prevent discrimination and harassment: We are firmly committed to preventing all forms of discrimination and harassment within our organization. This policy sets clear expectations for behavior and establishes guidelines to ensure that all individuals associated with Direct Aid are aware of their rights and responsibilities.
- Provide a safe and supportive environment: Direct Aid is dedicated to creating a safe and supportive work environment for all individuals. This policy aims to eliminate any barriers that may hinder individuals from fully participating and contributing to our mission. We strive to create an environment where all individuals feel safe, empowered, and able to reach their full potential.
- Encourage reporting and address complaints: We encourage individuals to report any incidents of discrimination or harassment promptly and without fear of retaliation. This policy provides a safe and confidential process for reporting and addressing complaints, ensuring that all concerns are taken seriously and investigated thoroughly.
- Comply with legal requirements: This policy is designed to align with all applicable local, national, and international laws and regulations related to anti-discrimination and harassment. By adhering to these legal requirements, we demonstrate our commitment to upholding ethical standards and promoting equality.
- By implementing and upholding this Anti-Discrimination and Harassment Policy, we aim to create a workplace culture that values diversity, promotes inclusivity, and fosters a sense of belonging for all individuals associated with Direct Aid. We believe that by respecting and embracing our differences, we can better serve our beneficiaries, achieve our mission, and make a positive impact in the communities we serve.

2. Values

As a Direct Aid representative, I will maintain Direct Aid's integrity and reputation by ensuring that professional and personal standards are met. Conduct that is demonstrably consistent with the values and standards of Direct Aid: Direct Aid Representatives will work to maintain and increase public trust in Direct Aid by being accountable for professional and personal actions taken and managing the power that comes with the job. These actions are based on the core value of "Ehsan" (meaning goodness), which is the fundamental value that guides us. The employees and volunteers strive to provide goodness to the community with satisfaction and happiness, regardless of financial considerations. We aim to achieve humanitarian values in giving and serving humanity. The value of "Ehsan" encompasses the following values:

Efficiency:

We work diligently to provide the beneficiaries' needs at the lowest possible cost and high quality.

Honesty:

We transparently and honestly disclose all administration and financial activities to the stakeholders.

Sympathy:

We are keen on the relationship of compassion and kindness between the Direct Aid family themselves and the beneficiaries.

Availability: We reach the donor and the beneficiary directly and seek their needs without intermediaries.

Neutrality: We provide our services without any considerations for race or religion

3. Scope

The Anti-Discrimination & Harassment policy for Direct Aid applies to:

- a. All Direct Aid Representatives which include all permanent, temporary, volunteers, interns, and part-time employees.
- b. All Direct Aid's main office, field offices, and project locations.
- c. Direct Aid's Service Providers and local partners are defined as contractors, suppliers and vendors, consultants, and sub-grantees.
- d. All offices desiring to continue adhering to the Direct Aid Accreditation and Licensing Standards;
- e. All other entities consenting to be bound by the policies of Direct Aid Yemen;
- f. Within the workplace; Outside the workplace, which includes work-related travel, social and training events, and situations outside working hours that affect the recipient's work environment.

By agreeing to contract with Direct Aid, you agree to comply with our obligations to carry out your work following the provisions of this policy. Representing Direct Aid means that you must meet Direct Aid's standards in this policy even if they are higher than the local context and laws.

The Anti-Discrimination & Harassment policy applies all the time. During working and non-working hours.

It sets out an ethical framework and behavioral management, which is as relevant and applicable to our personal lives as it is to our daily work. For this reason, all employees and other representatives working for or on behalf of the organization in any capacity, are required to sign a declaration (at the end of this document) confirming that they have read and understood the Anti-Discrimination & Harassment and agree to comply with it at all times

Any intentional or non-intentional Breaches of the Anti-Discrimination & Harassment are grounds for disciplinary action and may lead up to and termination of employment, contract, volunteer assignment, or any other form of engagement.

4. Definitions

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.

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

Bullying: Bullying refers to repeated inappropriate behavior, whether verbal, physical, or otherwise, conducted by one or more individuals against another or others. This behavior undermines the individual's right to dignity. While an isolated incident may be an affront to dignity, it is not considered bullying.

Verbal Abuse:

- Using aggressive or offensive language, either in public or private, to humiliate or intimidate.
- Regularly making offensive comments about the same person.
- Unfairly and excessively criticizing someone.
- Ridiculing an employee in front of others.
- Spreading false or malicious information about an individual within the Direct Aid community.
- Engaging in personal insults and name-calling.
- Threatening expulsion or job loss for minor errors.

- Non-Verbal Abuse:

- Overloading someone with work or setting impossible deadlines to ensure their failure.
- Withholding information and blaming someone for being ignorant.
- Ignoring, excluding, and isolating an individual.
- Blocking opportunities for promotion.
- Displaying threatening body language.
- Damaging personal belongings.
- Excessively monitoring someone.
- Making offensive or inappropriate comments through text messaging, email, or social networking sites.

- Physical Abuse:

- Hitting or engaging in abusive bodily contact.

The list provided above is not comprehensive and is intended as a general guide for employees and volunteers. Each situation will be evaluated individually and addressed accordingly.

- Lack of Respect:

- Lack of respect can manifest through direct comments, sarcasm, snide remarks, or an inappropriate joke towards a colleague. It can also be displayed through disrespectful behavior, such as demeaning attitudes or inappropriate jokes and teasing directed at a colleague. Ignoring, overlooking, or avoiding colleagues without valid reasons and in a manner that is hurtful or disrespectful is also a form of lack of respect. Also, Jokes or comments that may be amusing to others but are unpleasant, uncomfortable, or hurtful to a specific colleague should be avoided. It is important to maintain respect towards all colleagues without any distinction or exception.

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5. Statement

The principle of this policy is that Direct Aid has a zero-tolerance approach towards any form of sexual harassment, discrimination, or inappropriate behavior within its workforce. This means that such behavior, regardless of the location or timing, is strictly prohibited.

Employees are expected to refrain from engaging in any form of harassment towards others, whether it occurs on Direct Aid premises or outside of the workplace, and whether it takes place during working hours or outside of working hours. This policy highlights that the prohibition of harassment extends beyond the physical boundaries of the organization and includes any interactions or behaviors that may impact the working relationships or well-being of individuals associated with Direct Aid.

Any violation of this policy will be taken seriously and may result in disciplinary action. Breaches of the policy include but are not limited to engaging in discriminatory behavior, harassment, bullying, or any conduct that undermines the dignity and rights of individuals associated with Direct Aid. Such behaviors are strictly prohibited and may lead to consequences, ranging from verbal or written warnings to suspension, termination of employment or contract, legal action, or other appropriate measures. Direct Aid is dedicated to enforcing this policy consistently and fairly across all individuals, ensuring accountability and maintaining a safe and supportive work environment for everyone.

By explicitly stating that employees are prohibited from harassing others both on Direct Aid premises and elsewhere, during or outside working hours, the policy aims to establish a clear expectation that all employees are responsible for their behavior and are accountable for upholding a respectful and inclusive work environment at all times. This principle ensures that employees understand that their actions and conduct outside of the workplace can still have consequences within the organization if they violate the policy.

6. Principles and standards

The standards of behavior outlined in the definitions above are supplemented by specific provisions stated in the Direct Aid Code of Conduct. These provisions apply to all employees and representatives of DIRECT AID at all times.

Regarding sexual harassment, the following standards apply:

- Employees and representatives must not participate in any form of abuse, including sexual abuse.
- Exchange of money, employment, goods, or services for sexual favors is not allowed.

Regarding other forms of discriminatory and disrespectful behavior, the following standards apply:

- Respecting the basic rights of all individuals, irrespective of gender, disability, ethnicity, religion, caste, language, HIV status, or other aspects of identity.
- Acting fairly, honestly, and tactfully while treating people with dignity and respect.
- Not engaging in any form of discrimination, harassment, abuse (physical or verbal), intimidation, exploitation, or any other behavior that infringes upon the rights of others.
- Striving for high standards in work, taking responsibility for actions, and not misusing the position of power as a Direct Aid representative.
- Avoiding behaviors that could bring Direct Aid into disrespect.

To summarize, the standards outlined in the DIRECT AID Code of Conduct include the prohibition of sexual harassment, abuse, and exploitative behavior, as well as the expectation of treating all individuals with respect,

fairness, and dignity. Employees and representatives are also expected to uphold high standards in their work and avoid any actions that could harm the reputation of Direct Aid.

PSEA Officer Roles and Responsibilities

The PSEA officer plays a critical role in ensuring that all stakeholders, including staff, beneficiaries, partners' staff, and contractors' staff, are aware of and supported in addressing SEA effectively within the DA's operations and programming.

The main responsibilities of a Protection from Sexual Exploitation and Abuse (PSEA) officer in DA Organization towards various stakeholders include:

1. Staff:

- Mandatory Training and Awareness: Regular training sessions for DA staff on the PSEA policies, procedures, and the code of conduct of the organization.
- Reporting mechanisms: Establish and maintain confidential and accessible reporting mechanisms for staff to report SEA incidents.
- Support and guidance: Providing support and guidance to employees who have experienced or witnessed the SEA, including facilitating access to medical, psychological, and legal assistance.
- Monitoring and Enforcement: Monitoring the compliance of staff with PSEA policies and disciplinary action appropriate to staff who are involved in SEA.

1. Beneficiaries:

- Awareness - Conduct community-level awareness activities on the PSEA, including educating of beneficiaries on their rights and available reporting mechanisms.
- Confidential reporting: Establishing a mechanism for beneficiaries to report SEA incidents in a confidential and culturally sensitive manner.
- Support services: Ensure that SEA survivors have access to appropriate support services among beneficiaries, including medical care, advice, and legal assistance.
- Preventive measures: Implementation of preventive measures to reduce SEA risks, such as gender-sensitive programs and community-based protection mechanisms.
- Gender mainstreaming: Integrating gender considerations into all aspects of PSEA programming and response, recognizing the gender nature of SEA and its impacts.

2. Gender-sensitive approaches:

- Implementation of gender-sensitive approaches to prevention, reporting, and response to ensure that the needs of all sexes are met effectively.
- Intersection: consider cross-specific factors such as age, disability, ethnicity, and sexuality in the efforts of PSEA to ensure inclusive and equitable support for all persons affected by SEA.

3. Staff members of the Partner

- Capacity Building: Provide Mandatory training and capacity-building support to staff members of the Partner on PSEA policies, procedures, and best practices.
- Collaboration: Collaborating with partners to strengthen PSEA measures throughout the partnership, including joint awareness activities and reporting mechanisms.
- Monitoring and supervision: Regular monitoring and supervision of the PSEA practices of partners to ensure compliance with organizational standards and donor requirements.

4. Contractual obligations:

- ensuring that the contracting party is aware and complies with the PSEA requirements set out in the contract with DA.
- Training and supervision: Training and supervision of contractors' staff on PSEA policies, procedures, and expectations while working on projects or programs.
- Reporting mechanisms: Establishing reporting mechanisms for the staff of the contractors to report SEA incidents and ensure their access to support services, if necessary.

7. Code of Conduct Focal Person Roles and Responsibilities

The Code of Conduct Focal Point plays a crucial role in promoting a culture of integrity, accountability, and ethical behavior within the DA.

key responsibilities for a Code of Conduct Focal Point Direct Aid Organization:

1. **Compliance monitoring:** Regular monitoring and evaluation of the organization's compliance with its code of conduct policies and procedures. This includes staying informed about ethical standards, legal requirements, and best practices in the industry.

2. **To Provide Guidance:** To Provide guidance and support to staff on ethical issues, dilemmas, and issues relating to the Code of Conduct. This may include the interpretation of policies, the provision of ethical decision-making frameworks, and the provision of confidential advice.
3. **Procedure for complaints:** Serve as a primary contact point for staff to report complaints relating to violations of the Code of Conduct. Receive and file complaints sensitively and confidentially and ensure that all allegations are thoroughly and impartially investigated
4. **Investigation of allegations:** Conduct investigations into allegations of violations of the Code of Conduct promptly and impartially. This includes the collection of evidence, the interviewing of relevant parties, and the complete documentation of the conclusions. Maintain confidentiality throughout the investigation process to protect the privacy of all individuals concerned.
5. **Resolution and remedy:** Determine appropriate actions based on the findings of the investigation. This may include the implementation of corrective measures, the recommendation of disciplinary measures, and the facilitation of resolution between parties involved in conflicts or disputes.
6. **Training and Awareness:** Develop and offer training programs, workshops, and materials to increase awareness among staff of the Organization's Code of Conduct. Ensure that all employees understand their rights and responsibilities under the Code and are equipped to apply ethical principles in their daily work.
7. **Collaboration and reporting:** Work with other departments or teams within the organization, such as Human Resources, Legal Affairs, and Senior Management, to effectively address code of conduct issues. Regularly report to senior leaders on compliance activities, trends in ethical issues, and recommendations for improving the Code of Conduct Framework.
8. **Continuous improvement:** Regularly review and update organizational codes of conduct to ensure that they remain relevant, effective, and consistent with evolving ethical standards and regulatory requirements. Ask staff and stakeholders to provide feedback on areas for improvement and implement the necessary changes.

8. Reporting misconduct through established mechanisms

The reporting process for employees who experience sexual harassment or other forms of discrimination or disrespectful behavior is outlined as follows:

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1. Any employee who experiences sexual harassment has the right to raise a grievance or complaint. The complaint will be treated seriously, swiftly, sensitively, and confidentially.
2. For cases of other types of discrimination or disrespectful behavior, the local/national grievance procedure will be followed.
3. Employees who report incidents will be protected to the extent reasonably possible from victimization, retaliation, or false accusations.
4. In cases of sexual harassment, abuse, or assault, employees have several reporting options available to them, depending on what they feel is most appropriate for their situation.

Direct Aid has established various internal mechanisms to facilitate the reporting of misconduct and concerns under our Whistleblowing Policy. We encourage all individuals associated with our organization to utilize these channels to ensure that any wrongdoing, misconduct, or unethical behavior is promptly addressed. Below are the steps involved in reporting misconduct through our established internal mechanisms:

- a. **Informal route:** If the employee considers the harassment to be a one-off or a relatively mild instance of misconduct, they may choose to address the person engaging in the unwanted behavior directly. They can explain that the behavior is unwelcome, offensive, uncomfortable, and interferes with their work, and that repetition will be considered harassment.
- b. **Formal route:** In more serious cases, the employee has multiple options:
 - Reporting the concern through the Whistleblowing Policy.
 - Reporting the concern to the most senior manager in the location (e.g., Country Director) or the most senior HR representative in the location.
Reporting the concern directly to the regional office- in Kuwait.
<https://direct-aid.org/cms/contact-us-ar/>
 - Confidential Hotline: A confidential hotline is a dedicated phone number that whistleblowers can call to report their concerns.
 - Email Reporting: Organizations may have a dedicated email address where whistleblowers can send their reports. This method allows for a written record of the report and can accommodate more detailed information or attachments such as documents or images.

9. Annex



Acknowledgment Form

(Contractor/Partner) _____, Acknowledge the receipt and fully understand the Direct Aid Organization, Code of Conduct, PSEA, and Child Protection Policy and I am Knowledgeable of its contents.

(Contractor/Partner) confirm awareness of the fact that Direct Aid has zero tolerance against SEA and (Sexual Exploitation and Abuse), which is against the DA's core values any breach of this Code of Conduct, PSEA Policy, and Child Protection Policy by its staff could in the immediate termination of the contract, or even legal action and that intentionally false accusations and reports are seen as a breach of the Code of Conduct and will be subject to disciplinary action.

I confirm and agree to always adhere to the standards and procedures contained in DA's Code of Conduct, PSEA Policy, and Child Protection Policy and related forms that breaches may take, and fully understand and agree upon the mentioned policies and procedures,

(Contractor/Partner) will report any concern or incident relating to DA's Code of Conduct, PSEA, and Child Protection

In case of any concerns or suspicions regarding breaches or incidents, shall immediately communicate DA following DA's Whistle-blowing reporting mechanism.

I certify that I have followed DA's code of conduct, PSEA Policy, and Child Protection Policy entirety and agree to attend any PSEA Training, and shall continue to comply as well as any applicable rules and guidelines

Name: _____

Signature: _____

Title: _____

Date: _____