

POLICY ON PREVENTION OF SEXUAL EXPLOITATION AND ABUSE

A. GENERAL

IPE Global Limited (IPE Global) (hereinafter referred to as “the Company”) places human dignity at the centre of its development work. The Company takes seriously all concerns about sexual exploitation and abuse and complaints about them brought to our attention. The Company initiates rigorous investigation of complaints that indicate a possible violation of this Policy on Prevention of Sexual Exploitation and Abuse (“the Policy”) and takes appropriate disciplinary action, as warranted. This policy applies to complaints of sexual exploitation and abuse involving IPE Global employees and related-personnel.

B. REFERENCES

1. IPE Global – Child Protection Policy;
2. IPE Global – Policy for Prevention of Sexual Harassment.

C. PURPOSE

The purpose of this Policy is to provide guidance on prevention of sexual exploitation and abuse issues and making the staff members including project team members (including entire workforce as defined under **D. SCOPE**) aware of their responsibilities/ duties this Policy places on them towards third parties, referred to as “beneficiary” populations , in order to ensure the integrity of the Company’s activities.

D. SCOPE

This policy applies to the complaints of sexual exploitation and abuse involving entire workforce in the Company involving employees, whatever their status (including those on contract), subcontractors, sub-consultants, and/ or any other parties having business relations with the Company. Also, this policy applies to all branch offices and subsidiaries – IPE Global Centre for Knowledge and Development (IPE CKD), India; Ajooni Impact Investment Advisors Private Limited, India (Ajooni); Triple Line Consulting Limited, United Kingdom; IPE Global (Africa) Limited, Kenya; and branch offices in Ethiopia, Philippines, Myanmar, Nepal, and Bangladesh.

E. DEFINITIONS

1. Sexual Exploitation

Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, threatening or profiting monetarily, socially or politically from the sexual exploitation of another. Sexual exploitation and abuse also includes sexual relations with a child. For the purpose of this Policy, a child is defined as any person below the age of 18 (eighteen) years.

2. Sexual Abuse

The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

3. Beneficiary

Refers to people the Company works with and/or serves or seeks to assist across the world, who are typically in situations of vulnerability and dependence vis à vis the Company’s staff. Beneficiaries include direct or indirect recipients of the Company’s services in any project country/ area.

F. POLICY

1. Policy Statement

The Company is committed to the dignity and equality of all people in all the programmes and projects the company undertakes - and especially to the principle that our projects should ‘do no

harm'. We are committed to create a safe environment for beneficiaries including vulnerable groups especially women & children. The Company considers an act of sexual exploitation and abuse as serious misconduct, which may constitute grounds for disciplinary measures, including dismissal and criminal prosecution.

2. Principles

This Policy is informed by set of principles which include:

- i. Zero tolerance of sexual exploitation or abuse.
- ii. All beneficiaries including children and vulnerable adults have equal rights to protection from abuse and exploitation.
- iii. Each individual has a fundamental right to life, survival and development.
- iv. Everybody has a responsibility to support the care and protection of vulnerable population.
- v. No beneficiary must come to harm as a result of her/his engagement with the Company as a participant in programme/ project or as part of any advocacy campaign of the Company.
- vi. The Company's staff have a duty to behave ethically and to report suspicions of sexual exploitation and abuse which they may become aware of.

The above principles also extend to those individuals or organisation(s) associated with the Company. Therefore, everyone working for or associated with IPE Global's work must be aware of and adhere to the provisions of this policy.

G. ROLES AND RESPONSIBILITIES

1. Managing Director

As the custodian of Policy on Prevention of Sexual Exploitation and Abuse, Managing Director approves the Policy and its subsequent revisions.

2. Human Resource (HR)

Human Resource Department is responsible for implementation and monitoring the obligations under this Policy and is accountable for establishing and maintaining ethical culture. HR must ensure that it applies highest standards in its recruitment and vetting policies across the Company.

3. Department Heads/ Managers

Department heads/ managers are required to take active steps to ensure that every individual staff member(s) who are responsible to them are aware of the Policy and ensure their adherence to this policy.

4. Individual Staff Member

Individual staff members have a responsibility to ensure that vulnerable individual/s are protected.

5. Subcontractor/ Sub-consultant

Subcontractor(s)/ Sub-consultant(s) have a responsibility to ensure proper behaviour towards vulnerable population including project beneficiaries that is appropriate to their engagement with IPE Global.

If requested by the Client, each subcontractor must prepare and follow an appropriate Prevention of Sexual Exploitation and Abuse Policy and Procedures.

Where a member of workforce develops concerns or suspicions regarding sexual exploitation and abuse or exploitation by fellow worker, whether in the Company or not, s/he must immediately report such concerns via established reporting mechanisms.

H. CODE OF BEHAVIOUR

- ☞ Ensure that personal and professional conduct is, and is seen to be, of the highest standard and in keeping with the Company's Vision, Mission and Core Values and does not bring the Company into disrepute;
- ☞ Take reasonable action to protect others from harm and to challenge infringements of the rights of others. The duty to protect others is greater in the case of vulnerable beneficiaries;
- ☞ Take measures to protect children, young people and vulnerable adults, including refraining from physically and verbally abusing vulnerable adults including children (even where this is culturally acceptable) and use non-violent methods to manage beneficiary's behaviour (both within and outside the workplace);
- ☞ Always create and maintain an environment that prevents all forms of abuse and exploitation. Managers at all levels have a particular responsibility to support systems that maintain this environment;
- ☞ Not use their position to sexually abuse or exploit those who are beneficiaries of services provided by or channeled through the Company;
- ☞ Not use language or behaviour towards beneficiary that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
- ☞ Not engage in any type of sexual relationships with any person under the age of 18 regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defense;
- ☞ Never exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour;
- ☞ The Company's expectation is that all contact with vulnerable beneficiary especially female individual (whether by phone, email or direct contact) should be supervised, accompanied, or at least in sight of other adults. We recognise that situations may arise where this cannot be the case for urgent or for practical reasons. Where there is a lone adult working with one or more beneficiary especially vulnerable, the line manager should be informed upfront or as soon as possible;
- ☞ Never take beneficiary especially women and children with whom the staff member has established contact through their work to their home where they will potentially have lone contact with the beneficiary;
- ☞ Staff member will not be intoxicated under the influence of alcohol or drugs while in the presence of beneficiary;
- ☞ Refrain from showing favouritism to particular individual to the exclusion of others, or inconsistent application of rules, nor will they engage in any corrupt practice that may bring favour or disfavour onto particular individuals;
- ☞ Take permission from individual and her/his parent/ guardian before clicking photos or taking videos of them.

I. PREVENTIVE MEASURES

i. Recruitment

The Company strives to ensure that it applies highest standards in its recruitment and vetting policies across the organisation, as laid out in HR Manual. Recruitment and selection procedures reflect our commitment to prevention of sexual exploitation and abuse.

- ☞ All adverts for recruitment state that IPE Global is an equal opportunity employer.
- ☞ All appointments are subject to reference checks including where relevant, suitability to work with children.

- ☞ The Company does not employ any staff member (including those on contract) below the age of 18 years and where, during or upon recruitment, concerns come to light in relation to the applicant's unfavourable conduct with women & children.

ii. Training/ Awareness

All staff members receive prevention of sexual exploitation and abuse training to make them aware of the importance of preventing sexual exploitation and to be fully aware of procedure for reporting the concerns. The trainings in the following stages:

- a. Induction of new employees;
- b. Universal training/ awareness programme for all staff members;
- c. Tailored training as per the requirement of programme/ project.

J. REPORTING PROCEDURE

Staff members and other personnel are duty bound to disclose any Sexual Exploitation and Abuse concerns, including non-compliance of this Policy by anyone within the scope of this Policy in connection with official duties or business, immediately upon identification.

Whom to report?

Any staff member including beneficiaries, who suspect wrong-doing or are themselves subject to sexual exploitation or abuse, directly or indirectly, may submit a complaint of the alleged incident to the Nodal Officer:

Ms. Namita Wadhwa
Associate Director – Social and Economic Empowerment
Phone : +91 11 40755900; Extn.: 382
Mobile : +91 9162775467
Email : nwadhwa@ipeglobal.com

Where the concern has been submitted with MD/ COO/ Department Head, the same will be duly forwarded to Nodal Officer for investigations.

What to report?

If any staff member suspects sexual exploitation or abuse, or if an external beneficiary reports to the Company a suspicion or allegation relating to the Company's staff or activities, the following steps should be taken:

- ☞ Avoid any delay;
- ☞ Write down what you've heard or seen;
- ☞ Email or record the suspicion/ concern with the nodal officer (refer above – **Whom to Report?**)

The report must specify the nature of the suspicion/ concern and name(s) of the alleged abuser. The suspicion/ concern should include date and time of specific event(s), names of witnesses, if any and/or any evidence that support the allegation(s).

K. INVESTIGATIONS

The Company will act without delay, prioritising the safety of the individual involved, in the event of a concern or allegation of sexual exploitation and abuse being reported.

The nodal officer will convene a meeting within 24 hours – which can be face to face, by phone, skype or email (all emails should be signalled as confidential). The following (apart from nodal officer) member shall be present in the meeting:

1. For local oversight: Head of Department/ Project Manager (it may also include branch head);
2. For risk ownership and HR expertise: Head – CRC and Head – HR, respectively;

3. Representative of management: Chief Executive Officer (COO).

The members will investigate if there has been a breach of this policy by subject staff member (alleged perpetrator). An investigation will gather evidence and interview relevant parties in order to establish the probable facts in relation to the complaint/ disclosure.

The members of the meeting may recommend management of the Company through Head – HR to serve the suspension notice to the subject staff member (alleged perpetrator), until the investigation has been completed.

In case the members of the committee record serious malpractice against the subject staff member in its report, appropriate action shall be initiated, which shall include termination from the Company and informing statutory authorities, as per the law of land.

Confidentiality

Given the sensitive nature of investigations and its impact on the beneficiary as well as the person against whom such allegations are levelled, the Company is committed to maintaining strict confidentiality in relation to such complaints and the resultant investigations/ inquiry.

All proceedings, including the statements and other material adduced as evidence before the investigating members shall be strictly confidential and the members shall not divulge the details to any other employee within the Company or to any person outside. This includes Minutes of the Meetings, findings, recommendations, decisions of the members and any document or any verbal communication. Also, to other Employees involved in such discussions, the members should emphasize the necessity for confidentiality and the consequences of possible disciplinary action in case of transgression.

Appropriate sanctions will be applied in cases of malicious and deliberate false accusations of Sexual Exploitation and Abuse, which may include, but not limited to, termination.

L. DISCIPLINARY ACTION

While it will be ensured that staff member(s) who raises genuine disclosure are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection or this Policy will warrant disciplinary action.

Any person, who negligently or malafidely broadcasts confidential information in relation to investigations shall warrant disciplinary action.

Any person who makes any disclosure malafidely and knowingly that it was incorrect or false or misleading or frivolous or reported otherwise than in good faith, shall invite disciplinary action including initiation of civil or criminal proceedings and/ or termination from employment with the Company and its subsidiaries/ branches.

M. PROTECTION AGAINST RETALIATION

The Company takes reports of retaliation seriously. We will not tolerate any attempt to deter anyone from reporting suspicions of Sexual Exploitation and Abuse or incidents of repercussions/ victimisation against anyone who, in good faith, reports/ discloses a concern or cooperates with investigations even when allegations are found to be unsubstantiated. Any employee of the Company who retaliates against another employee in violation of this Policy is subject to disciplinary action, upto and including termination. This also includes attempts to deter anyone from reporting suspicions of sexual exploitation and abuse.

N. COMPLIANCE

This Policy cannot describe all Sexual Exploitation and Abuse situations that may arise. Therefore, employees (and other individuals) must use their respective good judgment to avoid any appearance of impropriety.

Alternatively, the concerned individual can get in touch with the nodal officer listed under point (J) above to clear any misconceptions.

O. MONITORING AND REVIEW

Head – HR will monitor the effectiveness and review the implementation of this Policy, on annual basis.

The Company reserves right to modify this Policy unilaterally at any time, without notice. Modifications may be necessary to maintain compliance with local regulations and/ or accommodate organisational changes in the company. Any revisions in this Policy including amendments or changes under respective clauses will be duly notified to employees through email communication. Also, such revised Policy or notification/ circular/ internal communication on such revisions will be updated in the library section of EmployWise (HR ERP). The employee shall be deemed to have read, understood and acknowledged the changes thereof which will supersede the terms of current Policy or any subsequent document/ communication related to the Policy.