



PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE (PSEA) POLICY

Policy Statement

The Ghana Monitoring and Evaluation Forum (GMEF) will not tolerate sexually abusive or exploitative acts being perpetrated by our employees, volunteers, members or anyone associated with the delivery of our programmes. Employees and managers are bound to uphold this policy and to report people or incidents that they believe contravene it.

GMEF managers and leadership have a duty to ensure that allegations of sexual exploitation and abuse are investigated and that appropriate disciplinary measures are taken. We also have a duty to provide appropriate assistance to any victims of sexual exploitation and abuse by our staff and members.

Principles

Definitions of Sexual Exploitation and Abuse and our responsibilities

Definitions of Sexual Exploitation and Abuse

GMEF defines the term **sexual exploitation** as **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 exploitation of someone else.**

The term **sexual abuse** means **actual or threatened physical intrusion of a sexual nature, whether by force, coercion or under unequal conditions.**

GMEF has a zero-tolerance stand on exploitative and abusive relationships. We will also not tolerate behaviour that endangers the security of employees or the organisation, or brings either into disrepute.

It follows, therefore, that employees and members should have:

- No sexual contact with children under the age of 18 (mistaken belief of age being no defence)
- No transactional sexual contact with GMEF beneficiaries.

GMEF recognises that sexual exploitation and abuse of vulnerable people is a global phenomenon and from our own and others' experience, it is clear that working with vulnerable individuals can entail dealing with issues of sexual exploitation and abuse.

It is vital that sexual exploitation and abuse are not perpetrated or compounded by those who GMEF puts in contact with vulnerable people. It is therefore crucial that we all understand the problem of sexual exploitation and abuse and our own role and responsibility in preventing it. Employees and members need to be mindful of how their sexual conduct might bring GMEF into disrepute.

Who the policy applies to

This policy applies to all employees, volunteers, consultants, members, representatives and people connected to GMEF including, for example, partners and researchers. They should ensure their conduct:

- Is never influenced by personal gain or advantage that results in a risk or detriment to GMEF
- Does not give rise to suspicion of improper motives.
- Is in keeping with GMEF policies and procedures
- Respects and never violates the rights of vulnerable people.

All those associated with GMEF must act in a professional and ethical manner in accordance with the [Code of Conduct](#).

Our responsibilities

It is the responsibility of our managers, leaders, employees, members and anyone who works with us to report incidences of inappropriate behaviour being perpetrated by anyone within GMEF or working for other agencies. Managers, in particular, are responsible for creating and maintaining an environment in which employees, volunteers and contractors know what GMEF expects from them and feel able to report any suspicious or inappropriate behaviour.

Our Partners

GMEF is clear that any partnerships we have with others is based on mutual respect for values and beliefs. When GMEF employees assess partner capacity to carry out projects this should include an assessment of the partner's capacity to meet our requirements in upholding this policy and the [Code of Conduct](#).

Making a complaint

Anyone has the right to make a complaint about the behaviour of those associated with GMEF and its programmes including any inappropriate behaviour of other employees, volunteers or members using the [Incident Report Form for SEA](#). Any manager/leader who suspects inappropriate behaviour should refer to [the Whistleblower Policy](#) and seek advice from the [GMEF Investigator/Compliance Officer for SEA Allegations](#), Management or leadership immediately.

Complaints from people external to GMEF will be dealt with under the [GMEF Incident Report Form for SEA](#) and presented to the [GMEF Investigator/Compliance Officer for SEA Allegations](#). We recommend that complaints be made within 3 months of an incident taking place. We recognise that this may not always be possible or likely with allegations of such a sensitive nature. An investigation can go ahead no matter how long ago an incident

occurred (but obviously the sooner the better) and no matter whether the alleged victim wishes to take an active part or not.

Investigations

GMEF has comprehensive procedures for carrying out investigations into allegations of sexual exploitation and abuse and a trained investigator to implement them. Guidance and support to the Investigator and those managing investigations is essential and is available from your Management team and SEA Team.

Investigations are an internal administrative process and would not therefore involve the police or judiciary. Investigations are carried out so that GMEF can have the best information possible on which to base its decisions concerning employee or member conduct and the consequences thereof. Please see [*GMEF Complaint Process and Services*](#).

We might then alert the appropriate authorities if, following an investigation, we judge that:

- A crime has taken place,
- Confidentiality can be ensured
- The victim is in agreement and
- Those associated with the case will not be subject to further abuse, disrespect or violence,

Victim Assistance

We will pursue investigations and take appropriate disciplinary procedures. Victims will receive immediate support as necessary, in line with the wishes and needs of the victim and to levels appropriate locally (and to a level deemed acceptable to appropriate professional staff).

Consequences

Employees or members who contravene GMEF's clearly stated expectations of their sexual conduct will be subject to disciplinary action that may result in dismissal. Volunteers and interns will have their relationship with GMEF terminated. Partners whose employees contravene our expectations and those expressed in partnership documentation must conduct appropriate investigations. Failure to do so will result in their relationship with GMEF being terminated. Contractors who contravene our expectations will have their contract ended.

As outlined above (in Investigations), the appropriate authorities might become involved under certain circumstances.

Learning

An annual report of PSEA activities will be prepared by the PSEA Team and presented to GMEF's Management Team and Leadership for learning and revision of this policy, as required.