



# CTG Safeguarding and Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy

## 1. Introduction

A Committed to Good (“CTG”, “we”, “the Company”) is fully committed to embedding best practice into the culture of our company and demonstrating this in the projects we deliver, ensuring that we do no harm to any beneficiary community.

To that end, we have developed this policy which serves to set out governing principles for CTG’s Personnel as well as, Consultants, Suppliers, Partners, Programme Visitors including client representatives, journalists, celebrities and politicians with respect to our collective responsibilities to protect all people, but particularly children, at risk adults and beneficiaries of assistance from harm.

In addition, this policy is reinforced by robust governance documents including (but not limited to):

- A Code of Conduct for our personnel, consultants and interns;
- A Supplier Code of Conduct; and
- A Whistleblowing Standard Operating Procedure.

## 2. Purpose

The purpose of this policy is to protect people, particularly children, at risk adults and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with CTG by eliminating or minimising risk of actual, attempted or threatened exploitation, abuse and harassment (including Sexual Abuse, Sexual Exploitation and Sexual Harassment). This includes harm arising from:

- The conduct of Personnel, Consultants and Interns working in CTG; and
- The design and implementation of CTG’s programmes and activities.

## 3. Scope

The policy applies to all CTG personnel, consultants, interns worldwide, as well as third parties and suppliers whilst engaged with work or visits related to CTG.

This policy applies equally to all groups, which includes women, children and vulnerable adults. This policy will address safeguarding including child safeguarding, adult safeguarding, and sexual exploitation, abuse and harassment (“SEAH”). However, it does not cover safeguarding or SEAH concerns in the wider community not perpetrated by CTG personnel, consultants or interns who are already covered by the CTG Code of Conduct.

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## 4. Application

### 4.1 What is Safeguarding and the Protection from Sexual Exploitation, Abuse and Harassment (PSEAH)?

Safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. In the humanitarian and development sectors, we understand it to mean protecting people, including children and at-risk adults, from harm that arises from coming into contact with our staff or programmes. It means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur. Protection from sexual exploitation, abuse and harassment (PSEAH) and child protection come under the umbrella term of Safeguarding. Definitions for these terms can be found at the end of this policy.

CTG takes a zero-tolerance stand on all forms of exploitation, abuse and harassment.

Safeguarding and PSEAH applies consistently and without exception across our programmes, and applies to all personnel, consultants and Interns, as well as suppliers involved in such programmes. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred, and also protect those accused until proven guilty.

CTG takes harassment and bullying extremely seriously and any allegations of such shall be investigated and dealt with in line with the Grievance Procedure.

Further definitions relating to safeguarding are provided in the glossary.

### 4.2 Our Approach

CTG believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect, harassment and exploitation. CTG will not tolerate abuse, exploitation and harassment by its Personnel, Consultants, Interns, or any third-party involved in the services provided by our company.

CTG ensures that we, as a business, act with integrity throughout our work. The Safeguarding and PSEAH Policy complements our Code of Conduct by identifying an additional need to take a proactive approach to Safeguarding and PSEAH, and set a company-wide standard for all Personnel, Consultants, Interns and any other type of personnel associated with the delivery of CTG's services.

CTG expects all our partners and suppliers to ensure similar measures are in place within their organisations. CTG is happy to work with partners and suppliers to manage this across our supply chains.

CTG is committed to Safeguarding and addressing PSEAH throughout its work, through three dedicated pillars of prevention, reporting and response.

### 4.3 Prevention

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#### 4.3.1 CTG Responsibilities

CTG pledges to:

- Ensure personnel, consultants and interns are aware of and comply with CTG's Safeguarding and PSEAH Policy;
- Actively demonstrate commitment to CTG's Code of Conduct and ensure its employees, consultants and interns have access to, are familiar with and understand their responsibilities outlined within this policy;
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with CTG. This includes the way in which information about individuals in our programmes is gathered and communicated;
- Implement safe recruitment and human resources management practices when managing and deploying Consultants that may be involved in projects with children and other vulnerable or at-risk groups. We commit to implement robust due diligence on those that we do recruit or contract to work with us;
- Ensure that appointed members of personnel receive training on safeguarding and PSEAH at a level commensurate with their role in the organisation, as appropriate.
- Ensure that all personnel, consultants and interns, as well as suppliers are informed and understand the whistleblowing procedures for the reporting of suspected breaches of this policy or observed acts of human rights abuse/modern slavery/human trafficking and sexual exploitation.
- Ensure this policy, as well as the rest of CTG governance documents, are clearly communicated to all relevant stakeholders through effective communication channels;
- Follow international and national laws regarding the protection of children and vulnerable adults including; The Children Act (1989 and 2004), United Nations Convention on the Right of the Child (1989), and The Equality Act (2010);
- Adhere to the Inter-Agency Standing Committee Six Core Principles relating to Sexual Exploitation and Abuse;
- Support and guide those who raise a query about a suspected breach of this policy; and
- Follow up on reports of safeguarding and SEAH concerns promptly and according to due process.

#### 4.3.2 Personnel, Consultants and Interns' Responsibilities

##### a) Child Safeguarding

CTG personnel, consultants and interns must not:

- Engage in sexual activity with anyone under the age of 18 (or older if illegal in country).
- Sexually abuse or exploit children.
- Subject a child to physical, emotional or psychological abuse, or neglect.
- Engage in any commercially exploitative activities with children including labour or trafficking.

##### b) Adult Safeguarding

CTG personnel, consultants and interns must not:

- Sexually abuse or exploit at risk or vulnerable adults.
- Subject an at-risk or vulnerable adult to physical, emotional or psychological abuse, or neglect.

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### c) Prevention of Sexual Exploitation, Abuse and Harassment

CTG personnel, consultants and interns must adhere to CTG's Code of Conduct at all times and must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance or services related to the CTG programme.
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics.
- Use or exploit unequal power dynamics or relationships based on unequal power for personal gain.
- Engage in any improper or unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or perceived to cause offence or humiliation to another person.

Additionally, CTG personnel, consultants and interns are obliged to contribute to an organisational culture where safeguarding and PSEAH are a priority by:

- Contributing to creating and maintaining an environment that prevents safeguarding or sexual exploitation, abuse or harassment violations and promotes the implementation of the Safeguarding and PSEAH Policy.
- Ensuring they review, understand, acknowledge and agree to abide by CTG's Code of Conduct and any updates thereto.
- Report any concerns or suspicions regarding safeguarding violations by a CTG employee or associated personnel in accordance with the Whistleblowing and Whistleblower Protection Procedure.
- Undertake training as required by CTG including but not limited to completing the following e-learning courses as part of the mandatory CTG Onboarding Pass prior to commencing services with CTG:
  - The Humanitarian Leadership Academy's e-course titled Safeguarding Essentials;
  - UNHCR's e-course titled Prevention of Sexual Exploitation and Abuse;
  - FIELD's e-course titled Equality, Diversity and Inclusion.
- Seeking guidance and advice if unsure about a potential breach of this policy.
- Notifying CTG Line Manager and/or Legal Team of any criminal charges or allegations during or prior to employment or consultancy.

## 4.4 Reporting

CTG will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with. Any employee, consultant, or intern reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by CTG's Whistleblowing Procedure, to the extent possible within the operational context and available services and resources.

Other external stakeholders such as partners, suppliers, official bodies are also expected to raise concerns, complaints or allegations to CTG in a timely manner.

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#### 4.4.1 How to Report a Safeguarding or PSEAH Issue

Personnel, consultants and interns who have a complaint or concern relating to safeguarding or PSEAH may report it directly to their designated CTG line manager or to CTG's Ethics Committee ([ethics@ctg.org](mailto:ethics@ctg.org)).

External stakeholders such as partners, suppliers, contractors or official bodies may directly contact report it immediately to CTG's Ethics Committee ([ethics@ctg.org](mailto:ethics@ctg.org)).

#### 4.4.2 Guidance on Receiving a Report

Reports of safeguarding complaints or concerns are not always explicit and can reach the organisation through various routes. This may be in a structured format such as a letter, e-mail, text or message on social media. It may also be in the form of informal discussion or rumour.

If you hear something in an informal discussion or chat that you think is a safeguarding or SEAH concern, you should report this to the Ethics Committee. If a safeguarding or SEAH concern is disclosed directly to you, as the person receiving the report you must bear the following in mind:

##### DO:

- Listen;
- Encourage them to speak up and inform them who to go to;
- Let them know that you have a responsibility to pass on the report confidentially;
- Empathise with the person;
- Ask who, when, where, what but not why;
- Repeat/ check your understanding of the situation;
- Tell the person what you will do next.

##### DON'T

- Become defensive;
- Argue with the person;
- Be dismissive;
- Blame others;
- Make assumptions without knowing the facts;
- Give personal opinions;
- Make promises you can't keep;
- Ignore the problem;
- Tell other people other than in line with the Whistleblowing Procedure;
- Try to investigate yourself.

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Due to the sensitive nature of safeguarding and SEAH concerns, confidentiality must be maintained during all stages of the reporting process, and information shared on a limited 'need to know' basis only. This includes senior management who might otherwise be appraised of a serious incident. The person receiving the report should forward this information on in writing to the Ethics Committee within 24 hours.

#### 4.4.3 Protection and Support

If an individual has raised concerns regarding a Safeguarding or SEAH issue, CTG shall do all it reasonably can within the operational context and scope of available services and resources to protect them against retaliation. The same shall apply if an individual co-operates in good faith with any audit or investigation which CTG management or CTG's Ethics Committee initiates into Alleged Misconduct.

Where an act of retaliation has been perpetrated by a CTG staff member, this will be considered an act of gross misconduct. CTG shall take a zero-tolerance approach to such an action and its standard disciplinary procedure will be followed.

We will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring to the greatest extent possible that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that harmful practices are, or may be, taking place in any part of our business or in any of our supply chains.

If you believe that you have suffered any such treatment, you should inform the Ethics Committee. If the matter is not remedied, and you are Personnel, Consultant or Intern at CTG, you should raise it formally using our Grievance Procedure.

#### 4.5 Response

CTG will follow up on safeguarding and SEAH reports and concerns in accordance with CTG's Whistleblowing Procedure, and legal and statutory obligations.

Should personnel, consultants or interns breach this policy, they will be subject to disciplinary action up to and including termination of their consultancy/ employment agreement. Similarly, CTG may terminate its relationship with any stakeholder who is found to be in breach of this policy.

Taking into consideration operational context as well as available services and resources, CTG will strive to offer support to survivors of harm caused by personnel, consultants or interns, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding use of offered support will be led by the survivor.

#### 4.6 Confidentiality

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It is essential that confidentiality is maintained to the greatest extent possible at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need-to-know basis only and any associated information should be kept secure at all times.

## 5. Definitions

Abbreviation/ definition	Description
<b>Beneficiary of Assistance</b>	Someone who directly receives goods or services from CTG's programme. Note that misuse of power can also apply to the wider community that CTG serves, and also can include exploitation by giving the perception of being in a position of power.
<b>Child</b>	A person below the age of 18.
<b>Harm</b>	Psychological, physical and any other infringement of an individual's rights.
<b>Psychological Harm</b>	Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.
<b>Protection from Sexual Exploitation and Abuse (PSEA)</b>	The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by humanitarian workers. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13).
<b>Safeguarding</b>	<p>In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect (NHS, 2011).</p> <p>In our sector, we understand it to mean protecting people, including children and at-risk adults, from harm that arises from coming into contact with our staff or programmes. Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur. This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.</p> <p>Safeguarding applies consistently and without exception across our programmes, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until proven guilty.</p> <p>Safeguarding puts beneficiaries and affected persons at the centre of all we do.</p>
<b>Sexual Abuse</b>	The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
<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,

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	socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.
<b>Sexual Harassment</b>	Sexual harassment is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. While typically involving a pattern of behaviour, it can take the form of a single incident. Sexual harassment may occur between persons of the opposite or same sex. Both males and females can be either the victims or the offenders. (ST/SGB/2008/5)
<b>Survivor</b>	The person who has been abused, exploited or harassed. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.
<b>At-Risk Adult</b>	Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.
<b>Personnel</b>	All permanent CTG Personnel (inclusive of senior managers, officers, directors and employees -permanent or temporary).

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