



GOALPrime Protection from Sexual Exploitation and Abuse Policy



Contents

1. Policy objective.....	2
1.1.Targeted Audience:.....	2
1.2. Effective Date:.....	2
1.3. Mandatory Revision Date:	2
2. Policy statement:	3
3. Scope of application:.....	3
4. Definitions:.....	3
5. Commitment to PSEA:	4
6. Six core principles:	4
7. PSEA framework:.....	5
8. No Retaliation.....	Error! Bookmark not defined.
9. PSEA Compliance Declaration.....	7

1. Policy objective

To promulgate policy of zero tolerance for sexual exploitation and abuse (SEA) for all GOALPrime Organization Nigeria (GPON) employees and related personnel and ensure that roles, responsibilities and expected standards of conduct in relation to SEA are known within GPON. To create and maintain a safe environment, free from SEA, by taking appropriate measures for this purpose, internally and in the communities where GPON operates, through robust prevention and response work.

1.1.Targeted Audience: All GPON employees and related personnel.

1.2. Effective Date: 10/06/2019

1.3. Mandatory Revision Date: 10/06/2021

We GOALPrime Organization Nigeria (GPON) Board members and management team on this day 10th of June 2019, after a collective evaluation of the protection from Sexual Exploitation and Abuse (PSEA) policy draft in a validation meeting, hereby validate this policy document and adopt it to be a working document in GPON's pursuit of maintaining a working environment that it Zero tolerance to SEA for the best interest and protection of our beneficiaries.



For the Board of Directors

OGUEGBU CHRISTOPHER CHINEDUMUIJE
CHIEF EXECUTIVE OFFICER
GOALPrime Organization Nigeria

2. Policy statement:

2.1. SEA violates universally recognized international legal norms and standards and are unacceptable behaviors and prohibited conduct for all humanitarian workers, including GPON employees and related personnel.¹

1.2. GOALPrime Organization Nigeria has a policy of zero tolerance towards SEA. All GPON employees and related personnel² are expected to uphold the highest standards of personal and professional conduct at all times, and to provide humanitarian assistance and services in a manner that respects and fosters the rights of beneficiaries and other vulnerable members of the local communities.

3. Scope of application:

3.1. This policy sets out GPON's approach to prevent and respond to SEA. The policy applies to all employees and related personnel, both on-and off-duty.

4. Definitions³:

4.1. For the purposes of the present policy the term '**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.

4.2. Similarly, the term '**sexual abuse**' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

¹ UN Secretary General's Bulletin ST/SGB/2003/13, 2003. <https://undocs.org/en/ST/SGB/2003/13>

² The term "related" personnel include, for example, sub-contractors, consultants, interns or volunteers associated with or working on behalf of the GOALPrime.

³ Both definitions are adopted from the Secretary General's Bulletin ST/SGB/2003/13, 2003. <https://undocs.org/en/ST/SGB/2003/13>

5. Commitment to PSEA:

5.1. GOALPrime Organization Nigeria 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.

5.2. This PSEA framework, affirms GPON'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 SEA⁴.

6. Six core principles⁵:

6.1. SEA by GPON employees and related personnel constitute acts of gross misconduct and are therefore grounds for termination of employment⁶.

6.2. 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 defense.

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

6.4. Any sexual relationship between GPON employees or related personnel 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 humanitarian aid work.

⁴ IASC Six Core Principles; available at: <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>.

⁵ Modified for the purposes of this PSEA policy. *These acts are not intended to be an exhaustive list.*

⁶ Including all other forms of contractual agreements, such as for example volunteer assignment.

6.5. Where a GPON employee or related personnel develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same organization or not, he or she must report such concerns via established reporting mechanisms.

6.6. All GPON employees and related personnel are obliged to create and maintain an environment which prevents SEA and promotes the implementation of this policy. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

7. PSEA framework:

7.1. Prevention:

7.1.1. Vetting: GOALPrime Organization Nigeria systematically vets all prospective job candidates in accordance with established screening procedures.

7.1.2. Training: GOALPrime Organization Nigeria holds mandatory induction and refresher trainings⁷ for all employees and related personnel on the Organization's SEA policy and procedures.

7.2. Response:

7.2.1. Reporting: GOALPrime Organization Nigeria has safe, confidential and accessible mechanisms and procedures for personnel, beneficiaries and communities, including children, to report SEA allegations that and ensures that beneficiaries are aware of these.

7.2.2. Investigation: GOALPrime Organization Nigeria has a process for investigation of SEA allegations in place and shall properly and without delay conduct an investigation of SEA by its employees or related personnel or refer to the proper investigative body if the perpetrator is affiliated with another entity.

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 and referral of survivors).

7.2.2.1. 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.

7.2.3. Victim assistance: GOALPrime Organization Nigeria has a system to promptly refer SEA survivors to available services, based on their needs and consent.

7.3. Cooperative arrangements:

7.3.1. All GPON contracts and partnership agreements include a standard clause requiring contractors, suppliers, consultants and sub-partners to commit to a zero-tolerance policy on SEA and to take measures to prevent and respond to SEA.

7.3.2. 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.

8. Protection from retaliation and handling false allegation

GOALPrime Organization Nigeria maintains a zero tolerance policy for retaliation against anyone for reporting sexual exploitation or abuse, assisting in making a complaint or participating in an investigation.

Any staff, associate or volunteer who makes a good-faith complaint of sexual exploitation or abuse, assists, testifies or participates in any investigation or proceedings or who reasonably opposes such conduct in the workplace will not be adversely affected in the terms and conditions of his/her employment and will not be discriminated against or charged for engaging in such activity.

Retaliation not only affects the recipient, but can also spread rapidly throughout GPON. It destroys faith in GPON's leadership and can damage employee morale. Complaints of retaliation will be promptly investigated. If retaliation is substantiated appropriate disciplinary action, including dismissal, will be taken.

9. PSEA Compliance Declaration

I _____ confirm that I have read and understood GPON Protection and Prevention against Sexual Exploitation and Abuse (PSEA) Code of Conduct and agree that in the course of my work and/or association with GPON, beneficiaries, especially children will comply with GPON PSEA Policy as stated. I understand that a breach of the PSEA Policy may provide grounds for disciplinary action, including grounds for termination of employment with. I also understand that a breach of the PSEA Policy, or applicable laws, could result in criminal prosecution, administrative penalties or other legal proceedings. To the extent permitted by applicable laws, I agree to indemnify and hold harmless GPON and its staff and directors, board members, volunteers, interns, consultants, contractors, any current or potential suppliers of any sort of good, services, or works and all other people not included in the above-mentioned categories who have signed a contract with GPON from and against any claims, expenses, liabilities, damages, proceedings, actions or causes of action brought against them resulting or arising from my breach of the PSEA Policy, or applicable laws.

I understand that it is my responsibility, as a person engaged by GPON, to use common sense and avoid actions or behaviors that are abusive or exploitative and could be construed as such. I authorize GPON to undertake any necessary inquiries, reference checks, as part of my appointment or recruitment process.

First Name: _____ Last Name: _____

Position: _____ Department: _____

Section: _____

Signature: _____

Date: _____