PREVENTION OF SEXUAL EXPLOITATION AND ABUSE (PSEA) POLICY

Power to Girls Foundation (P2G) is committed to upholding the highest standards of integrity, accountability and ethical behaviour in all aspects of our work. This policy strengthens P2G's existing Prevention of Sexual Exploitation and Abuse (PSEA) commitments by explicitly addressing sexual harassment and by setting out standards for conduct, prevention, safe recruitment, reporting, response, investigation and accountability.

1. Purpose and Scope

The purpose of this policy is to prevent sexual exploitation, abuse and harassment and to ensure that concerns are reported and handled safely, confidentially, promptly and consistently. The policy applies to all P2G staff, directors, board members, volunteers, interns, consultants, contractors, facilitators, mentors, partners and other representatives, in all locations and at all times when carrying out or representing P2G activities.

P2G recognises the right of all programme participants and community members, particularly children and young people, to be protected from sexual exploitation, abuse and harassment.

2. Definitions

Sexual exploitation: Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual abuse: Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual harassment: Unwelcomed conduct of a sexual nature that causes or could reasonably be expected to cause offence, humiliation, intimidation or an unsafe working or programme environment. It may be verbal, non-verbal, written, digital or physical.

Child: Any person under the age of 18. P2G's Child Protection/Safeguarding requirements apply alongside this policy whenever a concern involves a child.

3. Core Commitments

Zero tolerance for sexual exploitation, abuse and harassment by P2G personnel or representatives.

A survivor-centred and child-sensitive approach that prioritises safety, dignity, privacy, choice and non-discrimination.

No retaliation against a person who raises a concern or participates in a PSEAH process in good faith.

Confidentiality on a need-to-know basis, while recognising that information may need to be shared where required by law, safeguarding duties or immediate safety concerns.

PSEAH risk identification and mitigation will be integrated into programme design, partnerships, recruitment, training and organisational management.

4. PSEAH Code of Conduct

- All persons covered by this policy must sign and comply with this Code of Conduct. Breaches may result in disciplinary action up to and including termination of employment, contract, volunteer placement or partnership, and referral to relevant authorities where appropriate.
- Treat all people with dignity and respect and maintain appropriate professional boundaries.
- Never sexually exploit, abuse or harass a programme participant, colleague, community member or other person encountered through P2G work.

- Never engage in sexual activity with a child under 18, regardless of the local age of consent or any mistaken belief about age.
- Never exchange money, employment, goods, services, assistance, opportunities, preferential treatment or programme benefits for sex, sexual acts or sexualised attention.
- Never use a position of authority, trust, influence or access to seek or obtain sexual relationships, favours or conduct from a programme participant or other person in a vulnerable or unequal position.
- Never make sexual comments, jokes, gestures, messages, requests, advances or display/share sexual content in P2G workplaces, programmes or digital spaces.
- Do not engage in behaviour that could constitute grooming, coercion, intimidation, retaliation or abuse of power.
- Avoid being alone with a child in circumstances that are unnecessary, unobservable or contrary to P2G safeguarding procedures.
- Use photographs, videos, personal information and digital communication with children and programme participants only in accordance with P2G consent, safeguarding and privacy requirements.
- Immediately report any PSEAH concern, allegation, suspicion or disclosure through an approved P2G reporting channel. Staff must not investigate allegations themselves.
- Cooperate with authorised PSEAH reviews or investigations and maintain confidentiality.

5. Responsibilities

5.1 All Staff, Volunteers and Representatives

- Read, sign and comply with this policy and the PSEAH Code of Conduct.
- Complete required PSEAH induction, training and refresher training.
- Identify and reduce PSEAH risks in their work and follow safeguarding procedures.
- Report concerns promptly and preserve confidentiality.
- Do not retaliate against, intimidate or disadvantage any person who raises a concern.

5.2 Managers and Supervisors

- Create a working and programme environment in which PSEAH concerns can be raised safely.
- Ensure team members understand reporting obligations and complete required training.

- Include PSEAH responsibilities in relevant job descriptions, supervision and performance discussions.
- Identify and address PSEAH risks within programmes and teams.
- Escalate reports immediately to the designated PSEAH Focal Point/Leadership and do not conduct informal investigations.

5.3 Senior Leadership and Board

- Take overall responsibility for implementation and oversight of PSEAH measures.
- Designate a trained PSEAH Focal Point and an alternate reporting contact so that complaints can bypass a person who may be implicated.
- Ensure adequate resources for prevention, training, reporting, survivor support, investigation and monitoring.
- Ensure serious allegations are handled independently and impartially and that conflicts of interest are managed.
- Review implementation regularly and ensure partners and contractors meet applicable PSEAH standards.
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5.4 PSEAH Focal Point

- Coordinate implementation of the PSEAH policy, procedures, awareness and training.
- Receive and securely document reports, conduct an immediate safety/risk assessment and coordinate appropriate referral and response.
- Maintain confidential case records with access limited to authorised persons.
- Support PSEAH risk assessment, partner monitoring and periodic policy review.
- The PSEAH Focal Point does not determine guilt and should not investigate a case where they have a conflict of interest.

6. Safe Recruitment, Vetting and Onboarding

- P2G will apply proportionate safe-recruitment measures, with enhanced screening for roles involving children, young people, programme participants, sensitive information, unsupervised contact or positions of trust.
- Job advertisements and role descriptions will state P2G's commitment to PSEAH and safeguarding.
- Applicants will be asked PSEAH/safeguarding and values-based questions during interviews.
- Unexplained gaps in employment history and relevant inconsistencies will be explored.
- At least two references will be obtained where practicable, including a recent or previous employer, and referees will be asked about conduct, safeguarding concerns and suitability to work with children or vulnerable people where relevant.
- Identity and qualification checks will be completed as appropriate to the role.
- Criminal record, police/background or vulnerable-sector checks will be completed where legally available and proportionate to the role and jurisdiction.
- Offers for safeguarding-sensitive roles may be conditional on satisfactory screening.
- New personnel will sign their contract/engagement terms, this policy and the Code of Conduct before or at commencement.
- PSEAH and safeguarding induction will be mandatory, with refresher training provided periodically.

- P2G will not knowingly appoint or retain a person whose substantiated conduct presents an unacceptable safeguarding or PSEAH risk.

7. Reporting PSEAH Concerns

- Anyone - including staff, volunteers, programme participants, parents/caregivers, partners and members of the public may report a PSEAH concern. A person does not need proof before reporting. Reports should be made as soon as possible, but delayed reports will still be accepted.
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Approved reporting methods:

- Dedicated PSEAH email : reporting@powertogirls.com
- PSEAH Focal Point: Jessica Bentu - Jessica.b@powertogirls.com

- Alternate/Board reporting contact: Aisha Addo - Director of Programs aisha.a@powertogirls.com
- Email:reporting@powertogirls.com
- In person: to the designated PSEAH Focal Point, Country/Program Lead, or a member of senior leadership.
- Written complaint: a sealed written report marked 'Confidential - PSEAH' and delivered to a P2G office or authorised P2G representative.
- **Anonymous report:** a reporter may omit their name and identifying details when using email or a written complaint. Anonymous reports will be assessed and acted on to the extent possible with the information provided.
- Alternative route: if the concern involves the PSEAH Focal Point, a manager, or a person normally responsible for receiving reports, the report should be made directly to another senior leader or Board-designated contact.

8. Clear Reporting and Response Process

Step 1 - Receive: The receiving person listens without blame, does not promise absolute secrecy, records only necessary facts and thanks the reporter for raising the concern.
Step 2 - Immediate safety: Assess whether anyone is in immediate danger or needs urgent medical, psychosocial, child-protection or other support. Emergency and safeguarding action takes priority.
Step 3 - Escalate: The report is forwarded promptly to the PSEAH Focal Point or alternate authorised contact. Staff must not investigate, confront the alleged subject of complaint or seek additional evidence on their own.
Step 4 - Record and acknowledge: Create a confidential case record, restrict access to authorised persons and, where contact details are available, acknowledge receipt and explain the next steps.
Step 5 - Initial assessment: Assess safeguarding risk, conflicts of interest, applicable employment/contractual procedures, whether external reporting is legally required, and whether an independent investigator is needed.
Step 6 - Referral/support: Offer appropriate survivor-centred referrals and support. Where a child is involved, follow P2G child safeguarding procedures and applicable reporting obligations.

Step 7 - Investigation/management action: Where warranted, appoint an impartial and appropriately qualified investigator. Interim protective measures may be taken without presuming guilt.
Step 8 - Outcome and action: Decision-makers review findings and apply proportionate disciplinary, contractual, safeguarding or other action. Where appropriate and lawful, relevant authorities may be notified.
Step 9 - Close and learn: Where possible, inform the reporter/survivor that the process has concluded without disclosing confidential personnel information. Record lessons, address systemic risks and monitor for retaliation.

9. Confidentiality, Anonymous Reporting and Non-Retaliation
P2G will protect information relating to a report and share it only on a legitimate need-to-know basis. Anonymous reports are permitted. P2G recognises that anonymity can limit the ability to clarify facts or provide updates, but this will not prevent an initial risk assessment or appropriate action. Retaliation, threats, victimisation or adverse treatment against a reporter, survivor, witness or participant in a PSEAH process is prohibited.

10. Investigations and Accountability
P2G will respond to allegations fairly, promptly and impartially. Investigations will respect confidentiality, survivor safety, due process and conflicts-of-interest requirements. Where necessary, P2G may use an independent investigator or refer matters to relevant authorities. Substantiated violations may result in disciplinary or contractual action, including suspension, termination, ending a volunteer/partner relationship, and other lawful measures.

11. Support for Survivors
P2G will seek to provide or facilitate appropriate support based on the survivor's wishes, safety and available services. This may include medical care, psychosocial support, counselling, child-protection services, safety planning and referrals to specialised services. Access to support will not depend on participation in an investigation.

12. Communicating PSEAH Rights to Programme Participants
- P2G will ensure that programme participants, including children and young people, understand their right to be safe from sexual exploitation, abuse and harassment; the standards of behaviour they can expect from P2G personnel and representatives; and how to raise a concern.
- PSEAH information and reporting channels will be communicated in accessible, age-appropriate and context-appropriate formats. Depending on the programme, this may include participant orientation, posters, verbal explanations, school/community sessions, local-language materials and digital communication.
- Reporting information must clearly identify available confidential and anonymous reporting channels. Participants will not be required to report through the staff member responsible for their programme.
- P2G will make reasonable efforts to ensure reporting mechanisms are accessible to participants with different literacy levels, communication needs and levels of digital access.

- Programme staff and facilitators will be trained to recognise verbal and non-verbal signs of distress or discomfort and to respond in accordance with safeguarding and PSEAH procedures.
- P2G will periodically seek feedback from programme participants on whether PSEAH information and reporting mechanisms are understood, accessible, safe and trusted.

13. Programming and Partnerships

- PSEAH risks will be considered in programme design, delivery, monitoring and digital engagement.
- Partner, supplier, consultant and contractor agreements will include appropriate PSEAH expectations or clauses.
- P2G will assess and strengthen partners' capacity to prevent, report and respond to PSEAH where relevant.
- PSEAH concerns arising through partner-delivered activities will be escalated and managed under agreed reporting arrangements.
- PSEAH and safeguarding due diligence will form part of the selection and onboarding of relevant implementing partners. P2G will consider a prospective partner's existing safeguarding/PSEAH policies, reporting systems, past concerns where lawfully available, and capacity to meet P2G standards.
- For school and community-based programmes, P2G will identify appropriate local safeguarding and referral actors and, where appropriate, engage school leadership, parents/caregivers, community leaders and relevant authorities so that roles, reporting pathways and available support are understood.
- P2G will establish and communicate clear professional boundaries for relationships between personnel/representatives and programme participants, recognising the power imbalance created by access to programmes, mentorship, funding, employment, opportunities or other benefits.

14. Training, Performance and Monitoring

- PSEAH induction is mandatory for new staff and relevant representatives.
- Periodic refresher training will cover recognising risk, receiving disclosures, reporting obligations and safe response.
- PSEAH responsibilities will be reflected in relevant supervision, performance management and role descriptions.
- Leadership will monitor implementation and address identified gaps through a PSEAH action/work plan.
- PSEAH training and communication materials will be adapted, where appropriate, to the country, programme context, age group, language, literacy level and relevant local realities. Training should use practical scenarios that personnel and participants can understand and apply.
- Programme-level monitoring will periodically assess whether participants know what behaviour is prohibited, know how and where to report concerns, and consider available reporting channels accessible and safe.
- P2G will use practical feedback mechanisms, including participant and facilitator feedback where appropriate, to identify emerging PSEAH risks and improve implementation.

15. Policy Review
This policy and its procedures will be reviewed at least every two years, or sooner following a serious incident, material legal or organisational change, or identified implementation gap.

16. Acknowledgement
I confirm that I have read, understood and agree to comply with the Power to Girls Foundation PSEAH Policy and Code of Conduct.

Name	
Signature	
Date	
Designation / Affiliation	

ANNEX A - PSEAH REPORTING AND RESPONSE FLOW
1. Concern, disclosure or suspicion is received.
2. Ensure immediate safety and urgent medical, psychosocial or child-protection needs.
3. Report through any approved P2G reporting channel. Do not investigate or confront the alleged subject of complaint.
4. PSEAH Focal Point or alternate contact confidentially records the report and completes an initial risk assessment.
5. Offer survivor-centred support and make safeguarding/referral decisions, including child-protection action where applicable.
6. Determine whether an internal or independent investigation and/or external statutory reporting is required.
7. Conduct impartial investigation or other authorised fact-finding process and apply appropriate interim safeguards.
8. Authorised decision-makers determine disciplinary, contractual, safeguarding or other action based on findings.
9. Close the case appropriately, monitor for retaliation, document lessons and address systemic risks.

References used for strengthening this policy: Bond/CHS Alliance quick reference measures to prevent sexual exploitation and abuse; and FIT, Practical Applications to PSEAH - Learnings from FIT Innovators. These resources informed provisions on organisational responsibility, safe recruitment, accessible and anonymous reporting, localised training, participant communication, community engagement, monitoring and feedback, partnership due diligence, power dynamics, implementation monitoring and periodic review.