

MEDICAL TEAMS INTERNATIONAL POLICY

Title	<i>PROTECTION FROM SEXUAL EXPLOITATION, ABUSE AND HARASSMENT POLICY (PSEAH)</i>			Policy #	HR127
Applies to	Global Personnel			Origination date	03/2018
Policy Owner	<i>Director, Human Resources</i>	Department	<i>Human Resources</i>	Effective date	11/01/2023
This policy supersedes	<i>Replaces existing HR027 as an update</i>			Next review date	10/01/25

A. Purpose

Medical Teams International is committed to the protection and welfare of all people displaced by conflict or other disasters.

Daring to love like Jesus we boldly break barriers to health and restore wholeness in a hurting world, is our calling and, therefore, we are committed to ensure all individuals we encounter through our work are treated with respect and dignity and that specific standards of conduct are observed and practiced by all personnel.

We expect all personnel to put the well-being and best interest of the people we serve and members of the communities in which we serve as the highest priority, to treat all with respect and dignity, and to never engage in conduct that could be perceived as abusive, exploitative and/or harassing.

Medical Teams International is committed to the Inter Agency Standing Committee's (IASC) Six Core Principles Relating to Sexual Exploitation and Abuse upheld by the United Nations Secretary General's bulletin (ST/SGB/2003/13) on Special Measures for Protection from Sexual Exploitation and Abuse by UN and Non-UN Personnel. Medical Teams International is dedicated to following best practices set by coordinating partners and agencies such as the Inter-Agency Standing Committee (IASC), Core Humanitarian Standards Alliance, and Integral Alliance.

This policy sets forth Medical Teams International's expectations of all personnel in terms of professional behavior related to sexual exploitation, abuse or harassment of beneficiaries, community members or Medical Teams' personnel.

B. Policy

All people have the right to protection from harm, abuse, neglect, sexual harassment and sexual exploitation. Medical Teams International will not tolerate harm, abuse, neglect, sexual harassment, or sexual exploitation by its personnel.

We recognize there are unequal power dynamics across the organization and in relation to those we serve, and that we face the risk of some people exploiting their position of power for personal gain.

Medical Teams International commits to instituting safeguarding measures through supporting survivors, improving safeguarding capacity, reporting, investigating, responding to, and preventing any safeguarding misconduct.

Medical Teams International personnel are expected to support all efforts to eliminate any behavior, action or circumstances that undermine Medical Teams International's commitment to this standard.

1. PSEA CODE OF CONDUCT

To prevent sexual exploitation and abuse, Medical Teams International adheres to the following Code of Conduct for all personnel which is aligned with the IASC Six Core Principles Relating to Sexual Exploitation and Abuse:

1.1 Sexual exploitation, sexual abuse and sexual harassment by Medical Teams International Personnel constitutes acts of serious misconduct and are grounds for disciplinary measures, including summary dismissal.

1.2 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.

1.3 Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior by Medical Teams International Personnel is prohibited. This includes the exchange of assistance that is due to beneficiaries.

1.4 Sexual relationships between Medical Teams International personnel and beneficiaries of assistance are prohibited since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of the work of Medical Teams International's work.

1.5 When Medical Teams International personnel develops concerns or suspicions regarding sexual exploitation, abuse and/or harassment by a fellow worker, whether in the same agency or not, they must report such concerns via established reporting mechanisms.

1.6 Medical Teams International's personnel are obliged to create and maintain an environment which prevents sexual exploitation, sexual abuse, and harassment, and promotes the implementation of this code of conduct. Medical Teams International's management at all levels of the organization have a particular responsibility to support and develop systems that maintain this environment.

2. ZERO TOLERANCE

Medical Teams has a zero-tolerance policy against all forms of physical or sexual abuse and harassment among personnel and between personnel and program participants and/or community members. Violations of any portion of this policy are grounds for disciplinary action up to and including termination of employment, referral to law enforcement, or the termination of a contract, service agreement or partnership.

3. SURVIVOR-CENTERED APPROACH

Medical Teams International shall follow a survivor-centered approach that seeks to empower survivors by prioritizing their rights, needs and wishes. It must include:

file: insert path and filename

3.1 Safety: The safety and security of the survivor and others, such as their children and people who assisted them, must be a priority for all actors. Individuals who disclose an incident of sexual assault or abuse are often at high risk of further violence from the perpetrator(s) or from others around them.

3.2 Confidentiality: Survivors have the right to choose to whom they will, or will not, tell their story (i.e., disclosure). Maintaining confidentiality means not disclosing any information at any time to any party without the informed consent of the person concerned. Confidentiality promotes safety, trust and empowerment.

3.3 Respect: The survivor is the primary actor, and the role of helpers is to facilitate recovery and provide resources for problem-solving. All actions taken should be guided by respect for the choices, wishes, rights and dignity of the survivor.

3.4 Non-discrimination: Survivors of sexual exploitation, abuse and/or harassment should receive equal and fair treatment regardless of their, ethnicity, color, religion, sex (including gender expression, gender identity, sexual orientation, and pregnancy), national origin, age, disability, or any protected characteristic or activity.

4. ROLES AND RESPONSIBILITIES

4.1 Personnel Responsibilities:

1. **Duty to Report:** All concerns or suspicions of sexual exploitation, abuse or harassment must be reported by all Medical Teams International personnel within 24 hours. Failure to report may result in disciplinary action including termination of employment.
2. **Culture of Protection and Do No Harm:** Medical Teams International personnel are responsible for encouraging, advocating, ensuring and promoting an environment free from sexual exploitation, abuse and harassment.
3. **Reporting:** All Medical Teams International personnel are required to report any concern, doubt, or allegation of sexual exploitation, abuse or harassment. See Section 5.
4. **Training & Awareness Raising:** All personnel must complete annual training on Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) as provided and coordinated through the designated Country Office Human Resources contacts. Medical Teams International will also collect and provide resources, training, and other tools to support and promote continued awareness and commitment to safeguarding and protection from Sexual Exploitation, Abuse, and Harassment.

4.2 Leadership Responsibilities:

1. **Leadership Commitment:** Medical Teams International's leadership, including Country Office leadership, commits to overseeing the complete implementation of this policy in their area of operations; ensuring all safeguarding complaints are taken seriously and immediately reported, treated with confidentiality and given high priority. They commit to ensuring survivors are offered psychosocial, medical, legal, and other support as necessary; and that anyone who reports complaints or participates in investigations is not retaliated against.
2. **Higher Standard:** Leaders of Medical Teams International are held to a higher standard and are expected to exercise appropriate measures to prevent, promptly correct, and report any sexual exploitation, abuse or harassment they know about or have witnessed. Leaders will be proactive to create an environment conducive to reporting claims of sexual exploitation, abuse or harassment.
3. **Training:** Medical Teams International's leaders at all levels are responsible for ensuring their direct reports are trained on, per Medical Teams International approved processes and procedures, and have full knowledge of the Code of Conduct, helping to promote and honor the provisions of the policy.
4. **Awareness Raising:** Medical Teams leaders are responsible for regular communication and awareness raising of safeguarding and protection related messaging and themes throughout the calendar year.

5. REPORTING A COMPLAINT

All concerns of sexual exploitation, abuse or harassment (incidents or suspected incidents) must be immediately reported to a trusted supervisor, Country Director, or Human Resources (HQ or Country Office) or through reportline@medicalteams.org.

5.1 Incident Reporting System:

REPORTLINE

Call: 800-461-9330

Online: reportline.medicalteams.org

Country	Local Number
Colombia	+576 013816523 ETB: 844.397.3235
Ethiopia	+1 800 461 93 30 0800-86-1917
Sudan	249 15 655 9802
Tanzania	0800 780 005

Uganda	+256 206300115 0800 113213
Ukraine	+ 1 800 461 93 30 0 800 501 134

5.2 When a Person Receives a Complaint:

1. Report the complaint to a trusted supervisor, Country Director or Human Resources focal point or via ReportLine, or as outlined in the Country Office Standing Operating Procedures for Incident management within 24 hours of witnessing an incident or hearing of an incident.
2. Report the complaint through the complaint mechanism consistent with the instructions above or local Country Office Standard Operating Procedures.
3. Ask only the number of questions required to pass on the complaint via the designated reporting procedures as found in section 5.1 Reporting a Complaint, above.
- 4.

The following are some suggested questions that can be asked, but are not required to submit a report:

- Type of incident. Were there any mental or physical injuries?
- Were there any witnesses?
- Gender and presumed age?
- Who was involved?
- What happened?
- When and where did it happen?

5. Ensure the survivor's immediate safety is not at risk.
6. When a complaint is received, personnel are expected to file a report without discussing it with or disclosing information to other members of personnel.
7. It is not the responsibility of the person receiving the complaint, nor should the person investigate or ensure the validity of the claim – they are only to report it.

5.3 Reporting to Local Authorities:

1. If the allegations are criminal in nature, consideration of any legal duty to report alleged crimes to local authorities is required.
2. Survivor safety and endangerment must be considered before reporting to local authorities.
3. The decision not to report to local authorities must be taken after confirmation with the Director, Human Resources - HQ, Country Director, and the President & CEO. In addition, the decision cannot be made unilaterally, and the survivor must be consulted.
4. Any reports to local authorities must be managed through the investigation process.

6. RETALIATION:

file: insert path and filename

1. As per section B.4 in the FIN023 Anti-Fraud, Bribery, and Corruption policy, Medical Teams International will not retaliate against a reporter. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, poor work assignments, or threats of physical harm. The right of a reporter for protection against retaliation does not include immunity for any personal wrongdoing alleged and investigated. All personnel who retaliate against someone who has reported a violation in good faith are subject to discipline, up to and including termination of employment or service. This protection from retaliation is not intended to prohibit managers or supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.
2. If any Medical Teams International personnel feels they have been threatened, retaliated against, or unsafe for submitting a complaint, they should report this using one of the following options:
 - a. Contact headquarters or country office Human Resources
 - b. Contact the Country Director/Manager, or a trusted manager
 - c. Contact the Department Vice President or Chief
 - d. File a complaint using the Report Line complaint mechanism. (See section 5 above)

C. **DEFINITIONS**

Term	Definition
Exploitative relationship (Sexual Exploitation):	A relationship that constitutes sexual exploitation, i.e., 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. This can include coercing or engaging a person into a sexual act, prostitution, or pornography, with or without the person's consent, in exchange for goods and services, money, drugs, shelter, food, protection, or other benefits.
Humanitarian Worker:	All workers engaged by humanitarian agencies to conduct the activities of that agency. This includes individuals internationally and nationally recruited, and individuals formally or informally retained from the beneficiary community.
Paternity:	The state of being someone's biological father, often pertaining to a legal dispute in which a man is alleged to be the biological father of a child.

Personnel:	Full- and part-time employees, volunteers, consultants, partners, vendors, contractors, representatives, board members and associates representing Medical Teams International.
Program Participant:	A resident of a community where Medical Teams partners who is a recipient of services, and/or participate actively as a contributor of project service activities sponsored by Medical Teams and Medical Teams' partners.
Rape	Penetration – no matter how slight – of any body part of a person who does not consent, with a sexual organ and/or the invasion of the oral, genital or anal opening of a person who does not consent with any object or body part.
Reporter:	Any person internal or external to the organization who reports an activity they consider illegal, dishonest or constituting abuse to one or more of the parties specified in this policy. The reporter is not responsible for investigating the activity, or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.
Sex with a Minor:	Sexual penetration of a person younger than 18. Sexual penetration include(s) the penetration of the vagina, anus or mouth by any body part, and includes the penetration of the vagina or anus by an object. Sexual penetration of a child is prohibited regardless of the local age of majority or consent and is considered to be a form of sexual abuse. Mistaken belief in the age of a child is not a defense.
Sexual Abuse:	Actual or threatened physical intrusion of a sexual nature, including inappropriate touching, by force or under unequal or coercive conditions.
Sexual Activity with Minor:	Sexual activity with a person younger than 18. All sexual activity with a child is prohibited regardless of the age of majority or consent locally and is considered to be a form of sexual abuse. Mistaken belief in the age of a child is not a defense.
Sexual Assault:	Sexual activity with another person who does not consent. It is a violation of bodily integrity and sexual autonomy and is broader than conceptions of “rape”, especially because (a) it may be committed by other means than force or violence, and (b) it does not necessarily entail penetration.

file: insert path and filename

Sexual Harassment:	Any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense 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.
Solicitation of a prostitute:	Solicitation of transactional sex.
Solicitation of Transactional Sex:	Requesting transactional sex
Survivor:	Someone who raises a complaint of sexual exploitation and abuse or the person against whom sexual exploitation and abuse is committed.
Trafficking of Persons for Sexual Exploitation:	The recruitment, transportation, transfer, harboring or receipt of persons, by means of threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or a position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of sexual exploitation. The recruitment, transportation, transfer, harboring or receipt of a child for the purpose of exploitation shall be considered "trafficking in persons" even if this does not involve any of the means set forth above (e.g. threat or the use of force or other forms of coercion etc.).
Transactional Sex:	The exchange of money, employment, goods or services for sex, including sexual favors and other forms of humiliating, degrading or exploitative behavior. This includes any exchange of assistance that is due to beneficiaries.
Vulnerable Populations:	Adults and children who are unable to protect themselves from harm, exploitation, and harassment for any reason including gender, mental health, physical health, disability, ethnicity, religious identity, economic, social status, and/or because of disasters and conflicts, are deemed to be at risk.

Zero Tolerance	Violations of any portion of this policy are grounds for disciplinary action up to and including termination of employment, referral to law enforcement, or the termination of a contract, service agreement or partnership.
-----------------------	--

Exceptions: None

Related Policies:

Child & Vulnerable Adult Protection, PSEA Global Standards of Operation, Workplace Harassment, FIN023 Anti-Fraud, Bribery, and Corruption

References: IASC Core Principles for PSEA; IASC PSEA Minimum Operating Standards
<https://psea.interagencystandingcommittee.org/update/iasc-six-core-principles>
 IASC PSEA Minimum Operating Standards

Related Legislation: Secretary General's Bulletin (ST/SGB/2003/13)
<https://www.un.org/preventing-sexual-exploitation-and-abuse/content/documents>

Related Forms, Attachments, Waivers, Guidelines

Revision History

Section(s) Changed/Description of Change(s) (Add to table for additional revisions)	Revised by (Name)	Date of Revision
V1 – Initial release of policy		
V2 – Adding complaint procedures, EE & Mgr. Responsibility, zero tolerance.	A. Anderson	05/01/2018
V3 – Revisions more in line with current industry standards.	A. Anderson	October 2023

Policy Acknowledgement:

*To be signed by **all** Medical Teams International personnel. A copy will be kept on file within the specific country office, HR Function or Volunteer Engagement Team.*

Protection from Sexual Exploitation and Abuse Policy Commitment

I declare that:

I have read, understand, and agree to the Protection from Sexual Exploitation, Abuse and Harassment policy. (PSEAH)

I understand this policy always applies to me including while I am on or off duty, or on leave.

I will work within the requirements and procedures as laid out in the Protection from Sexual Exploitation, Abuse and Harassment Code of Conduct and Standards of Operation policies. I have not

file: insert path and filename

been accused or convicted of any offense involving physical, mental/emotional or sexual abuse or exploitation of any individual(s).

I understand that if a complaint is brought against me regarding sexual exploitation or abuse while engaged with Medical Teams International, the allegation will be investigated in cooperation with the appropriate authorities.

I understand that any violation of this policy may result in disciplinary action up to and including termination of employment, referral to law enforcement, or the termination of a contract, service agreement or partnership.

Signature: _____

Date: _____

Print Name: _____