Prevention of Sexual Exploitation and Abuse (PSEA) Policy

Effective: October 2026

Purpose

HIAS does not tolerate Sexual Exploitation or Abuse. The HIAS PSEA Policy specifically defines responsibilities related to the prevention of Sexual Exploitation and Abuse perpetrated against HIAS Program Participants and community by Associated Personnel.

We expect that anyone working in the name of or on behalf of HIAS will treat all Program Participants with dignity and respect and not engage in conduct that is exploitative or abusive. HIAS does not tolerate any form of Abuse, Neglect or Exploitation. This Policy specifically covers Sexual Exploitation and Abuse caused by:

- The conduct of Associated Personnel.
- The design and implementation of HIAS' programs and activities, including operations, recruitment, procurement, fundraising and communications.

This Policy does not cover:

- Sexual Harassment in the workplace, which is addressed by HIAS' Anti-Discrimination, Harassment, Bullying and Abuse of Power Policy (see Associated Policies below).
- Abuse or Exploitation concerns in the wider community not perpetrated by HIAS staff, associated personnel, partners or visitors

See Appendix A for a glossary of terms and definitions.

Applicability

This Policy applies globally to all HIAS staff and other personnel, HIAS Partners and certain HIAS Visitors (collectively referred to as "Associated Personnel").

This Policy applies at all times, including outside working hours.

Following this Policy is mandatory. Non-compliance will lead to disciplinary action, up to and including termination. Associated Personnel found to have committed Sexual Exploitation and Abuse or engaged in sexual activity with children may be subject to criminal action.

For HIAS Partners, violation of this Policy or failure to take appropriate corrective action may result in suspension or immediate termination of the partnership agreement and may also result in the party being deemed ineligible for future partnership agreements with HIAS.

HIAS follows the law. If any part of this policy conflicts with the law, the law must be followed. However, if HIAS' standards for Safeguarding are stricter than the law, then HIAS' standards must be followed.

Policy Statement

HIAS is committed to the prevention of Sexual Exploitation and Abuse caused by participation in programming or committed by HIAS Associated Personnel. HIAS will operate in a way that minimizes opportunities for Abuse or Exploitation to occur and commits to engaging in responses to concerns in a timely, survivor-centered manner.

HIAS is committed to meeting or exceeding core principles regarding the prevention of Sexual Exploitation and Abuse outlined by the UN Secretary General in 2003[1] and in the Inter-Agency Standing Committee's (IASC) Six Core Principles Relating to Sexual Exploitation and Abuse[2].

All Associated Personnel are required to comply with the following:

- Associated Personnel are required to create and maintain an environment that prevents Sexual Exploitation and Abuse.
- HIAS strictly prohibits Associated Personnel from engaging in Sexual Exploitation and/or Abuse of anyone, regardless of their status as a Program Participant.
    - HIAS participates in the Misconduct Disclosure Scheme. Associated Personnel who are found to have engaged in Sexual Exploitation and/or Abuse may have their information shared with a requesting organization, according to the terms of the Misconduct Disclosure Scheme.
- Sexual activity is prohibited with children (persons under the age of 18) regardless of the age of majority or age of consent locally or status of a child in programming. Claiming to not know a child's age is not a defense.
- 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 paying for commercial sex acts including services from Sex Workers, even if such transactions would be legal and/or consensual in the jurisdiction where they would occur.
- Associated Personnel must not exchange sex for humanitarian service or assistance. Associated Personnel may not accept sex as payment, gratitude, bribe or offer from Program Participants, even if the offer comes from the Program Participant.
- Any sexual or romantic relationships are generally prohibited between Associated Personnel and Program Participants.
    - Exceptions may be permitted in specific circumstances with appropriate disclosure to the Country Office and with assurance that there is not an abuse of power, rank or position. Failure to disclose a relationship will be treated as a violation of this Policy.
    - The relationship must be approved by the Vice President, People Operations and the Director of Safeguarding. The relationship may be evaluated to ensure that it is not exploitative or involves an abuse of power. If approved, duties may be modified to avoid a conflict of interest.
- Associated Personnel may not accept accommodations in the home of a Program Participant, nor share sleeping accommodations such as a hotel room or guest house. Associated Personnel may not house Program Participants in their home or invite participate to visit their home or living accommodations.
- Associated Personnel may not Sexually Harass Program Participants.

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[1] https://daccess-ods.un.org/access.nsf/Get?OpenAgent&DS=ST/SGB/2003/13&Lang=E

[2] https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse

- Any concern, suspicion or witness to an incident of Sexual Exploitation or Abuse by Associated Personnel must be reported immediately via HIAS' reporting mechanisms.
    - Failure to report knowledge or a reasonable suspicion or concern of a Safeguarding violation will be subject to disciplinary action, up to and including termination.
    - Associated Personnel must cooperate in any investigation when requested.

Managers and Leaders must:

- Promote a culture that prevents abuse and supports this Policy.
- Make sure their teams understand and follow the Policy.
- Take all reports seriously and either personally report concerns via HIAS' reporting mechanisms or ensure staff under their supervision immediately complete reporting responsibilities.
- Protect Whistleblowers from retaliation.
- Ensure staff performance supports a safe and accountable workplace.
- Ensure all members of their team attend proper training.
- Build systems that help to consistently implement this Policy.

HIAS will:

- Design all programs and activities to protect Program Participants from physical, sexual, emotional or financial abuse or exploitation.
- Use strong Safeguarding practices when hiring and managing staff, including relevant and legally obtainable criminal background, reference and Misconduct Disclosure checks.
- Train all staff on this Policy and their specific responsibilities at hire and annually thereafter.
- Post clear, visible information about this Policy and how to report concerns in all offices and project sites, in relevant languages.
- Assign a Safeguarding focal point in each country to support staff, raise awareness, and receive reports.
- Inform Program Participants and communities about this Policy and how to report Safeguarding concerns.
- Provide multiple safe, confidential, and accessible ways for people to give feedback or report concerns, as outlined in the Accountability to Affected Populations Guidance. Reports will be escalated quickly to HIAS' General Counsel and the Global Safeguarding Team.
- Include Safeguarding requirements including the prevention of Sexual Exploitation and Abuse in contracts and agreements with partners, assess their ability to follow this Policy, and monitor their compliance.
- Follow national laws when working with children and Vulnerable Adults. If HIAS standards are stricter than local laws, HIAS standards will apply.

Reporting

HIAS requires all associated personnel to immediately report any Safeguarding concerns to HIAS' General Counsel by telephone (1-888-559-8518), email (ethics@hias.org) or www.hias.ethicspoint.com. Reports may also be submitted to Safeguarding staff or focal points. Reports may be submitted anonymously.

Any staff reporting concerns or complaints will be protected from any form of retaliation or negative employment consequences, per HIAS' Whistleblowing Policy. Anyone who knowingly gives false information will break this Policy and may face disciplinary action.

HIAS' Global Safeguarding Team and General Counsel will report Safeguarding concerns to the Executive Group.

They will also decide if the funder or donor needs to be informed, based on reporting rules. If the concern involves criminal behavior, it will be reported to relevant authorities, while considering the survivor's safety, security, and preferences.

Investigations

HIAS will carry out independent, confidential, and Survivor-Centered investigations by trained investigators designated by the Global Safeguarding Team, including contracting with external investigators as needed. Individual staff members and offices should not carry out investigations or engage investigators separate from the official HIAS investigation efforts. Assigned investigators will recognize the rights and interests of everyone involved, including the person making the report and survivor (if different from the reporter), witnesses, and subject of complaint. Investigations will be carried out according to HIAS' Standard Operating Procedures for Dealing with Safeguarding Concerns. HIAS will follow any required funder reporting expectations in consultation with the Office of General Counsel.

Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with Safeguarding concerns. Information relating to the concern and subsequent case management will be shared only on a need-to-know basis and will be always kept secure. Where a law, rule or regulation, such as the European Union General Data Protection Regulation (GDPR), governs a person's access to information, HIAS will comply with that law, rule, or regulation while also keeping information related to the concern confidential.

Associated Policies

- HIAS Code of Conduct
- HIAS Safeguarding Policy
- HIAS Safeguarding of Children Policy
- HIAS Anti-Human Trafficking
- HIAS Whistleblowing Policy

These policies are maintained in multiple languages on HIASNet.

Changes and Updates to this Policy

HIAS reserves the right to make changes and updates to this Policy as required. If modified, the Policy will be communicated to all Associated Personnel and posted on HIASNet, indicating the date of the latest revision.

HIAS Personnel PSEA Certification Form

- I confirm that I've received and read the HIAS PSEA Policy. I understand what it says and agree to follow all its rules.
- I will report any possible or actual violations of this Policy or related procedures.
- I understand it's my responsibility to ask questions if anything in the Policy is unclear, and I've had the chance to do so.
- I understand that if I break this Policy, fail to report a violation I know about, or intentionally hide a violation, I may face disciplinary action. This could include losing my job or contract with HIAS, and HIAS may take legal action against me.
- I also understand that violations may lead to criminal or civil penalties under the law, which HIAS may choose to pursue.
- I agree to sign this Policy when I start working with HIAS and again annually.

_____ _____

Print Name Position or Affiliation with HIAS

_____ _____

Signature Date

Document Type: Board Policy
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Date of Approval:
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APPENDIX A: Glossary of Terms

Associated Personnel refers to all HIAS Staff and Personnel, HIAS Partners and certain HIAS Visitors. Associated Personnel are covered by this Policy and are subject to Policy requirements.

Child is a person below the age of 18 - *UN Convention on the Rights of the Child, Article 1*.

Community Member is a person living in proximity to HIAS programming who may come into contact with Associated Personnel representing HIAS, regardless of their involvement in the program. Note that this Policy also covers exploitation and abuse caused by HIAS in the wider community where our programs are taking place.

Guest House means a HIAS-managed or HIAS-funded accommodation facility used for short-term, temporary, surge, transit, emergency, or official duty-related stays

Harm is physical, sexual, or emotional abuse, neglect, and exploitation, as well as any other infringement of an individual's rights.

HIAS Partners refers to external parties in association (contractual or non-contractual) with HIAS such as HIAS' partners, affiliates, sub-recipients, suppliers, and vendors, working for or receiving funding from HIAS.

HIAS Staff and Personnel is (a) permanent, fixed term, and temporary staff; (b) board members; (c) outside consultants, independent contractors, and sub-contractors; (d) third-party representatives and agents; and (e) volunteers, community workers, interns and public service or fellows who conduct work on behalf of HIAS.

HIAS Visitor refers to visitors or guests at HIAS programs, programmatic sites or offices invited to HIAS locations or acting in an official capacity with HIAS Program Participants that are not otherwise covered by mutual agreements (such as UNHCR representatives) handled by contract or at the global level.

Misconduct Disclosure Scheme is an interagency agreement to systematically request and share information on substantiated allegations or ongoing investigations of sexual exploitation, abuse, and harassment (SEAH) during the recruitment process.

Program Participant is someone who directly receives goods or services from HIAS' program(s). In some locations or programs a Program Participant may be referred to as a participant, client, beneficiary or beneficiary of services.

Safeguarding is the measures put in place by organizations to prevent, identify and respond to harm that may be caused by inappropriate sexual activity, abuse or exploitation, or other exploitative or abusive conduct. It is the organization's responsibility to make sure their staff, operations and programs "do no harm" to anyone that comes in contact with the organization, especially children and vulnerable adults, and to not expose them to the risk of or actual harm and abuse - *Keeping Children Safe (adapted)*.

Sex Workers are adults who sell or exchange sex for money, goods or services (e.g., transport), regularly or occasionally. – *UN Working Group on Discrimination Against Women and Girls, March 2024*

Sexual Abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions - *UN Secretary-General's Bulletin on Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13)*.

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 - *UN Secretary General's Bulletin on Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13)*.

Sexual Harassment is defined as unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature. Sexual harassment can occur regardless of the gender of the person committing it or the person exposed to it.

Survivor Centered Approach: HIAS is committed to responding to all reports of conduct that violate this Policy with a survivor-centered approach. This means that the safety, dignity, and well-being of the survivor are the primary considerations in all steps that HIAS takes in responding to Safeguarding concerns and in taking precautions to minimize any additional harm to the survivor. HIAS will seek to ensure that survivors are referred to medical, psychosocial, legal, and safety support services, as appropriate and available, and according to the survivor's specific needs and wishes. HIAS will assist survivors with reporting incident to the proper authorities should they choose to do so.

Vulnerable Adult is a person who is, or may be, in need of care by reason of mental, physical, emotional, psychological, or other disability; age, sex, gender, sexual orientation, gender identity, 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. - *UK Government Department of Health (abridged).* Note: Due to issues of poverty, marginalization, relative lack of power, and lack of access, all Program Participants served by HIAS programs are considered vulnerable.

Whistleblower is a person who has a reasonable belief regarding the violation of law, rule, regulation or HIAS policy. This person can expect to be protected from retaliation when making a report, in line with HIAS' Whistleblowing Policy.

Zero Tolerance is the organization's responsibility to adequately respond to any concerns of violations of this Policy. This includes the obligation to report any knowledge, suspicion, or concern about a Safeguarding violation, the responsibility to investigate any concerns that are brought to our attention, and, in the case of substantiated allegations, to respond with adequate remedial and corrective measures, including through disciplinary action, up to and including termination of employment or third-party agreement.