

# Prevention of Sexual Exploitation and Abuse of Beneficiaries Policy

## 1. Purpose

CSA is committed to safeguarding the dignity and well-being of all individuals we serve, work with, and support. This policy establishes CSA's zero-tolerance stance on sexual exploitation, abuse, harassment, and any form of misconduct against beneficiaries. Our goal is to prevent harm, protect vulnerable individuals, and ensure accountability in all aspects of our work.

## 2. Scope

This policy applies to:

- CSA employees (full-time, part-time, and temporary)
- Consultants, contractors, partners, members, and suppliers
- Downstream partners, agents, and volunteers
- Any person or entity representing CSA

Safeguarding is a shared responsibility across all levels of our work. This policy complements CSA's broader safeguarding, anti-harassment, and whistleblower policies and aligns with applicable laws, including India's Sexual Harassment at Workplace (Prevention, Prohibition & Redressal) Act, 2013 for our Delhi office.

## 3. Definitions

### Sexual Exploitation and Abuse (SEA)

Abuse of a position of power, vulnerability, or trust for sexual purposes. This includes actual or attempted coercion, profiting (financially, socially, or politically), or exchanging assistance for sexual favors.

### Sexual Harassment

Any unwelcome sexual behavior that offends, humiliates, or intimidates. This can include physical acts, verbal remarks, written communications, or non-verbal gestures.

## 4. Safeguarding Principles

CSA commits to:

- Upholding survivor-centered, transparent, and accountable systems.
- Actively challenging power imbalances and gender inequality.
- Integrating safeguarding into recruitment, training, and performance processes.
- Ensuring robust reporting, response, and learning mechanisms.
- Protecting confidentiality and ensuring safety throughout investigations.

## 5. Prohibited Conduct

CSA strictly prohibits:

- Sexual exploitation or abuse of beneficiaries.
- Sexual activity with anyone under 18.
- Sexual relationships with beneficiaries unless explicitly approved after ensuring no risk of exploitation or conflicts of interest.

Examples of prohibited behavior include coercion, exchanging services for sexual favors, physical assault, and inappropriate sexual remarks or materials.

## 6. Consequences for Misconduct

Any credible allegation will lead to immediate protective action, including suspension. Confirmed violations will result in termination and permanent ineligibility for future employment. CSA will report criminal offenses to law enforcement as required.

## 7. Reporting Procedures

### How to Report

- Direct reports to your line manager, the Safeguarding Officer, or via CSA's Whistleblower channels.
- Anonymous reports are accepted, though named reports are encouraged for clarity and investigation.
- Reports will be handled confidentially, with respect for all parties' rights.

### Key Reporting Principles

- Report suspicions immediately—investigation will verify facts.
- Never delay or attempt personal investigations.
- Protection against retaliation is guaranteed for those reporting in good faith.

### Confidentiality

Information is shared only on a strict need-to-know basis within investigative and safeguarding processes. CSA may disclose

information when required by donors or legal authorities.

## **8. Responsibilities**

All CSA-associated individuals must:

- Prevent, identify, and report any suspected SEA.
- Uphold this policy in all actions and partnerships.
- Support and participate in training on PSEA obligations.

Managers have an increased duty to foster a safe environment, act decisively, and ensure robust compliance.

## **9. Implementation**

CSA enforces this policy through:

- Rigorous recruitment checks to prevent hiring individuals with histories of misconduct.
- Mandatory training for all staff on safeguarding and reporting.
- Clear guidance for beneficiaries on reporting concerns.
- Strong contractual safeguards with partners and suppliers.
- Oversight from CSA's Board and Risk Management Committee.

## **10. Relationship to Local Law**

CSA will meet or exceed legal standards wherever it operates. This policy sets minimum expectations; where local law requires more stringent measures, CSA will comply.

## **11. Integration with Other Policies**

This policy operates alongside CSA's:

- Anti-Human Trafficking and Modern Slavery Policy
- Code of Conduct
- Duty of Care Policy
- Prevention of Sexual Harassment Policy
- Safeguarding Policy
- Whistleblower Policy

## **12. External Partners**

CSA requires partners, suppliers, and contractors to uphold equivalent safeguarding standards. Where necessary, CSA will require written agreements to adhere to this policy.

## **13. Quality Assurance**

CSA's Risk Management Committee reviews safeguarding cases to ensure policy effectiveness and identifies areas for improvement through monitoring and staff feedback.