



Protection from Sexual Exploitation and Abuse (PSEA) Policy

1. Scope of the PSEA Policy

LDS workers are expected to always uphold the highest standards of personal and professional conduct to protect beneficiaries of assistance. Sexual exploitation and abuse (SEA) by workers directly contradict the principles upon which humanitarian action is based and represents a protection failure. SEA inflicts harm on those whom the humanitarian community is obligated to protect.

All LDS employees and related personnel are required to behave irreproachably with the project beneficiaries or members of the community, using particular care with the most vulnerable groups that include minors, women, the elderly, those living with disabilities and social outcasts. LDS commits to create a zero-tolerance organizational culture against complacency and impunity. LDS management is expected to create and maintain an environment that prevents sexual exploitation and abuse. LDS management must be familiar with and enforce this policy, being proactive in overseeing their team.

Through the Protection from Sexual Exploitation and Abuse Policy, LDS clearly expresses its determination to prevent and combat sexual exploitation, abuse of beneficiaries and members of the community by LDS employees and all related personnel. LDS SEA policy sets minimum standards to be followed to protect beneficiaries and members of the community from sexual exploitation and abuse.

The policy is principally addressed to all LDS employees and related personnel included in the following categories.

- A. Board of Directors and LDS management
- B. All the employees and collaborators in all LDS structures and projects
- C. Non-LDS entities and their employees and individuals who have entered into partnership, sub-grant or sub-recipients agreement with LDS, committees, associations of any sort including their members and staff supported, financially or otherwise, by LDS.
- E. Consultants and other freelance persons who act on behalf of LDS based on service contracts.
- F. All persons acting voluntarily on behalf of LDS.
- G. Suppliers of any sort of goods, services, or works, including current and potential suppliers.
- H. All the other people not included in the above-mentioned categories who have signed a contract with LDS. The principles set forth in this policy apply all times, during and outside the office hours and during the periods of leave, with no exceptions.

2. Policy statement

SEA are a violation of LDS Ethical Code and LDS Code of Conduct.

LDS does not tolerate any form of sexual exploitation and abuse, as well as bullying and a range of non-sexual abuses of power perpetrated by LDS employees and related personnel against any individual regardless of age, gender, sexuality, disability, religion, or ethnicity.

LDS commits to do all the needful for preventing programs having any negative effects such as SEA by LDS employees and related personnel against beneficiaries and members of the community. LDS takes seriously all the complaints and concerns about sexual exploitation and abuse, and it initiates rigorous investigation of complaints that indicate a possible violation of this policy or the LDS Code of Conduct.

3. Core Principles

3.1 Sexual exploitation and abuse by LDS employees and related personnel constitute acts of gross misconduct and are therefore grounds for disciplinary actions and or termination of employment contracts within the applicable and current regulations.

3.2. 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 defence and in no way shall ignorance of the age of the person be accepted as a justification. The Safeguarding Policy further set the principles and operational procedures and guidelines for guaranteeing children safeguarding in all domains of LDS action.

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

3.4. Sexual relationships between LDS staff and beneficiaries and members of the community are prohibited since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of our work.

3.5. Where LDS employees and related personnel develop concerns or suspicions regarding sexual abuse by a fellow worker, whether the individual works for LDS or for other organization, partners, suppliers, or other related stakeholders, he or she must report such concerns through the means and tools available within the Organization.

3.5 The LDS Board must be informed about all the concerns and suspicions, including rumors, in good faith arising and relating to sexual exploitation and abuse.

3.6. All LDS staff members, whatever their levels are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of the Code of Conduct.

4. Commitments

LDS is determined to fulfilling the core principles through the implementation of the following commitments:

4.1 To prevent and mitigate the risk of sexual exploitation and abuse by LDS employees and related personnel:

4.1 (i) Management must ensure robust recruitment screening process for all the personnel.

4.1 (ii) LDS is responsible to engage the support of communities and respond to sexual exploitation and abuse.

4.1(iii) Putting in place a strong and accessible Compliant Handling and Feedback Mechanism (CHFM) for reporting sexual exploitation and abuse. CHFM should not be a separate, parallel system to other complaints and feedback structures in each area, but rather link to and build on existing structures to create one system for handling feedback and complaints.

4.2 To identify and act upon potential or actual sexual exploitation and abuse by staff in a timely and systematic manner. The LDS has:

4.2 (i) set protocols and frameworks to process complaints of sexual exploitation and abuse in a timely manner, including the immediate suspension of the alleged perpetrator from all the activities with a direct impact on beneficiaries and communities until the investigation is ended.

4.2 (ii) set protocols to communicate and properly inform the appropriate authority which is responsible for conducting investigations for sexual exploitation and abuse allegations.

4.2(iii) put in place mechanisms to ensure that beneficiaries and members of the community know to whom they should report and what sort of assistance they can expect to receive. All potential and actual survivors of SEA must be fully informed about how the complaint mechanism works, including the reporting process.

4.2(iv) Put in place accessible channels for complainants and survivors to receive feedback on the development and outcome of their case, and the CHFM will make every effort to maintain lines of communication.

4.2 (v) ensures taking appropriate disciplinary actions including immediate termination of employment and referral for criminal prosecution and legal action, where appropriate, against the person who committed sexual exploitation and abuse.

4.2 (vi) ensures the protection of the victim, the complainant, and the whistle-blower of SEA after having verified and confirmed the reported facts either by internal investigation or by external investigation.

4.2 (vii) ensure that all the third party, including partners and suppliers are committed to respect the principles included in the SEA Policy.