



## Footprint to Freedom

### Organizational Management

### Prevention of Sexual Exploitation and Abuse (PSEA) Clause

#### 1. Zero Tolerance Policy

Footprint to Freedom, its partners, contractors, employees, agents, and subcontractors shall adhere to a strict zero-tolerance policy regarding sexual exploitation and abuse (SEA). Engaging in any form of SEA constitutes a breach of ethical standards and contractual obligations and will result in immediate and decisive action.

#### 2. Definitions

For the purposes of this clause, the following definitions shall be applied:

- **Sexual exploitation** refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes. This includes profiting monetarily, socially, or politically from the exploitation of another.
- **Sexual abuse** means the actual or threatened physical intrusion of a sexual nature, regardless of whether the act involves force, is under unequal power dynamics, or occurs in coercive circumstances.

#### 3. Preventive and Corrective Measures

Footprint to Freedom is committed to taking all reasonable and necessary steps to prevent and respond to SEA incidents. This commitment involves the following measures:

- a. **Clear Policy Implementation:** All personnel, including partners and contractors, must be made aware of the zero-tolerance policy for SEA and commit to upholding it throughout their association with Footprint to Freedom.
- b. **Mandatory Screening and Vetting:** Conduct thorough background checks for all personnel, including criminal history and references checks, especially for those in positions of trust or working directly with vulnerable populations.
- c. **Comprehensive SEA Training Programs:** All personnel must undergo regular and mandatory training on PSEA, including how to identify signs of SEA, understand reporting procedures, and handle disclosures in a trauma-informed manner. Training should also emphasize culturally appropriate responses to SEA incidents.
- d. **Mandatory Reporting Mechanisms:** All SEA incidents, suspicions, or allegations must be reported within 24 hours to Footprint to Freedom. The organization will establish secure, accessible, and confidential reporting channels, protecting whistleblowers and survivors from retaliation.
- e. **Support and Assistance for Survivors:** Ensure immediate and appropriate referral pathways for professional assistance, including psychosocial, medical, and legal support. The response should be survivor-centered, prioritizing the dignity, safety, and preferences of the survivor.
- f. **Investigation Protocols:** Implement a transparent and fair process for investigating SEA allegations, ensuring that investigations are conducted confidentially, impartially, and in line with legal and ethical standards. Outcomes must be communicated to all relevant parties while maintaining the confidentiality of the survivor.



g. **Corrective Action and Disciplinary Measures:** If SEA incidents are verified, appropriate disciplinary measures will be taken, including termination of employment or contracts, and legal action where necessary. Corrective measures should also include reviewing policies and procedures to prevent future occurrences.

h. **Awareness-Raising and Community Involvement:** Regularly conduct awareness sessions within the communities where Footprint to Freedom operates, educating beneficiaries and community members about SEA prevention, reporting procedures, and support services available to survivors.

#### 4. **Obligations of Subcontractors and Partners**

All subcontractors and partners are required to:

a. **Adopt SEA Prevention Measures:** Implement policies and procedures to prevent SEA within their operations, mirroring the standards of Footprint to Freedom.

b. **Conduct Personnel Screening and Training:** Ensure all staff undergo background checks and mandatory SEA training, and share their SEA policies with Footprint to Freedom for review.

c. **Report and Investigate SEA Allegations:** Comply with Footprint to Freedom's reporting requirements and cooperate with any investigation processes.

d. **Provide Access to Victim Assistance:** Guarantee that survivors of SEA under their operations have access to professional support services.

e. **Implement Contractual Penalties for Breach:** Understand that failure to comply with SEA prevention and response measures will lead to termination of contracts and legal accountability.

#### 5. **Reporting Obligations**

Any personnel aware of, or suspecting, SEA incidents must report them through the established mechanisms immediately. Reporting is mandatory and non-compliance will be subject to disciplinary actions.

#### 6. **Commitment to Ethics and Cultural Sensitivity**

Footprint to Freedom shall ensure that all PSEA efforts are aligned with cultural and local contexts while upholding the highest ethical standards. The organization will also involve local communities and survivors in designing PSEA interventions to ensure their relevance and effectiveness.

#### 7. **Monitoring, Evaluation, and Continuous Improvement**

Footprint to Freedom will regularly monitor and evaluate the implementation of PSEA measures, including collecting feedback from beneficiaries and staff. Annual reviews of SEA policies and practices will be conducted, with improvements made based on lessons learned and evolving best practices.

#### 8. **Confidentiality and Survivor Protection**

a. **Confidential Handling of Reports:** All reports of SEA shall be handled with the utmost confidentiality to protect the privacy of survivors and witnesses.

b. **No Retaliation Policy:** Individuals who report SEA or cooperate with investigations are protected against retaliation, and any retaliatory acts will be met with severe consequences.

#### 9. **Contractual Consequences**

A breach of this clause constitutes grounds for immediate termination of any agreement with Footprint to Freedom, and may also result in legal action to hold the responsible party accountable.