



Approved by the Executive Director

Margarita Hakobyan

A handwritten signature in blue ink, appearing to read "Margarita Hakobyan".

Date: February 3, 2025

**Policy title:** Protection from Sexual Exploitation and Abuse

**Policy objective:** To promulgate policy of zero tolerance for sexual exploitation and abuse (SEA) for all employees and related personnel and ensure that roles, responsibilities and expected standards of conduct in relation to SEA are known within OxYGen Foundation. To create and maintain a safe environment, free from SEA, by taking appropriate measures for this purpose, internally and in the communities where the organization operates, through robust prevention and response work.

**Targeted Audience:** All OxYGen employees and related personnel.

**Effective Date:** February 3, 2025

**Mandatory Revision Date:** January 1, 2030

## **1. Policy statement:**

1.1. SEA violates universally recognized international legal norms and standards and are unacceptable behaviors and prohibited conduct for all humanitarian workers, including OxYGen employees and related personnel.<sup>1</sup>

1.2. OxYGen has a policy of zero tolerance towards SEA. All employees and related personnel<sup>2</sup> are expected to always uphold the highest standards of personal and professional conduct, and to provide humanitarian assistance and services in a manner that respects and fosters the rights of beneficiaries and other vulnerable members of the local communities.

## **2. Scope of application:**

2.1. This policy sets out the OxYGen approach to prevent and respond to SEA. The policy applies to all employees and related personnel, both on and off-duty.

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<sup>1</sup> From the UN Secretary General's Bulletin ST/SGB/2003/13, 2003. Available at: <https://undocs.org/en/ST/SGB/2003/13>

<sup>2</sup> The term "related personnel" include, for example, sub-contractors, consultants, interns or volunteers associated with or working on behalf of the Organization.

### **3. Definitions of SEA<sup>3</sup>:**

3.1. For the purposes of the present policy the term '**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.

3.2. Similarly, the term '**sexual abuse**' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

### **4. Commitment to PSEA:**

4.1. OxYGen will make every effort to create and maintain a safe environment, free from SEA, and shall take appropriate measures for this purpose in the communities where it operates, through a robust PSEA framework, including prevention and response measures.

4.2. This PSEA framework, affirms OxYGen commitment to the UN Secretary General's Bulletin on Special Measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13) and to achieving full, ongoing implementation of the IASC Six Core Principles relating to SEA<sup>4</sup>.

### **5. Six core principles<sup>5</sup>:**

5.1. SEA by OxYGen employees and related personnel constitute acts of gross misconduct and are therefore grounds for termination of employment<sup>6</sup>.

5.2. 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.

5.3. 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 exchange of assistance that is due to beneficiaries.

5.4. Any sexual relationship between OxYGen employees or related personnel and beneficiaries of assistance or other vulnerable members of the local community that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.

5.5. Where an OxYGen employee or related personnel develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same organization or not, he or she must report such concerns via established reporting mechanisms.

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<sup>3</sup> Both definitions are adopted from the UN Secretary General's Bulletin ST/SGB/2003/13, 2003. Available at: <https://undocs.org/en/ST/SGB/2003/13>

<sup>4</sup> IASC Six Core Principles relating to SEA, 2002. Available at: <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>.

<sup>5</sup> Modified for the purposes of this PSEA policy. These acts are not intended to be an exhaustive list.

<sup>6</sup> Including all other forms of contractual agreements, such as for example volunteer assignment.

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5.6. All OxYGen employees and related personnel are obliged to create and maintain an environment which prevents SEA and promotes the implementation of this policy. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

### **6. PSEA framework:**

#### **6.1. Prevention:**

**6.1.1. Vetting:** OxYGen systematically vets all prospective job candidates in accordance with established screening procedures. Reference checks are asked from previous employers for the candidate before hiring.

**6.1.2. Training:** OxYGen holds mandatory induction and refresher trainings<sup>7</sup> for all employees and related personnel on the Organization's SEA policy and procedures. The training is provided during the on-boarding induction of the employee and is refreshed annually during the annual performance review and objective setting session.

#### **6.2. Response:**

**6.2.1. Reporting:** OxYGen has safe, confidential and accessible mechanisms and procedures for personnel, beneficiaries and communities, including children, to report SEA allegations that and ensures that beneficiaries are aware of these. OxYGen's programme managers serve as focal points, ensuring multiple safe and confidential reporting channels, raising awareness among beneficiaries, handling reports with trained sensitivity, protecting against retaliation, maintaining secure documentation, and overseeing a structured response process.

**6.2.2. Investigation:** OxYGen has a process for investigation of SEA allegations in place and shall properly and without delay conduct an investigation of SEA by its employees or related personnel or refer to the proper investigative body if the perpetrator is affiliated with another entity. The internal procedures include confidential reporting system, timely and impartial investigations by trained personnel, cooperation with relevant authorities, protection measures for survivors and whistleblowers, documentation and case tracking, and defined actions based on investigation outcomes.

**6.2.2.1. Referral to National Authorities:** If, after proper investigation, there is evidence to support allegations of SEA, these cases may be referred to national authorities for criminal prosecution.

**6.2.3. Victim assistance:** OxYGen has a system to promptly refer SEA survivors to available services, based on their needs and consent. OxYGen's victim assistance mechanism includes safe and confidential reporting channels, a survivor-centered referral system with trained case managers, formal partnerships with service

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<sup>7</sup> The training includes at a minimum: 1) a definition of SEA (that is aligned with the UN's definition); 2) a prohibition of SEA; and 3) actions that employees and related personnel are required to take (i.e. prompt reporting of allegations and referral of survivors).

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providers, strict confidentiality protocols, emergency support options, staff training on ethical case handling, and monitoring to ensure effective assistance.

### **6.3. Cooperative arrangements:**

6.3.1. All OxYGen contracts and partnership agreements include a standard clause requiring contractors, suppliers, consultants and sub-partners to commit to a zero-tolerance policy on SEA and to take measures to prevent and respond to SEA.

6.3.2. The failure of those entities or individuals to take preventive measures against SEA, to investigate allegations thereof, or to take corrective action when SEA has occurred, shall constitute grounds for termination of any cooperative arrangement.