



GOVERNANCE LINKS TANZANIA (GLT)

PROTECTION FROM SEXUAL EXPLOITATION, ABUSE AND HARASSEMENT (PSEAH) POLICY

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APPROVAL

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1.0 BACKGROUND AND INTRODUCTION

1.1 About Governance Links Tanzania Programme

Governance Links Tanzania (GLT) is a non-Governmental Organisation that envision a society committed to social, economic and environmental sustainability through participatory governance. The mission of Governance Links Tanzania is to improve the quality of life of marginalised communities through promotion of effective governance and ensuring social, economic and environmental sustainability. Governance Links Tanzania was registered in 2008, with Certificate of Compliance Number 0904 of December 2008.

1.2 Policy Introduction

Governance Links Tanzania has a zero tolerance for sexual exploitation and abuse. Governance Links Tanzania will not tolerate its staff, associates, partners, or any other representatives associated with the delivery of its work to engage in any form of sexual exploitation or abuse. Vulnerable adults, women and children are particularly at risk of sexual exploitation and abuse. Governance Links Tanzania is committed to protecting all communities that the organization works with from sexual exploitation and abuse at all times.

This policy ensures that all Governance Links Tanzania staff, associates, and partners are aware of their role and responsibilities in keeping communities and stakeholders safe from any form of sexual exploitation or abuse. The policy clarifies definitions and responsibilities regarding prohibited behavior and the associated PSEAH procedures outline the reporting and investigation processes.

2.0 ACCOUNTABILITY STATEMENT

Governance Links Tanzania takes this policy very seriously, and the mandate prohibiting any form of sexual exploitation and abuse comes from Governance Links Tanzania Management Team and Board of Directors.

The PSEAH policy applies to all Governance Links Tanzania staff, associates, and partners who must comply with its requirements and understand the sanctions that may be applied for breaches of the policy. Where required by law or local practices, Governance Links Tanzania may enhance the standards as set out in this policy. This commitment will be evidenced through signing the policy and the Code of Conduct. Training for this policy is mandatory for all Governance Links Tanzania staff, associates, and partners.

The Board of Governance Links Tanzania is ultimately accountable for this policy. The Executive Director, Management team and Board of Governance Links Tanzania are responsible for its implementation. It is the responsibility of all representatives of Governance Links Tanzania to raise any concerns regarding sexual exploitation and abuse. Governance Links Tanzania takes all concerns and complaints seriously and will initiate an investigation of complaints that are in violation of this policy and take disciplinary and possibly legal action as warranted.

3.0 POLICY APPROACH

This policy details how Governance Links Tanzania achieves its obligations and applies to all staff, associates and partners regardless of their position.

4.0 FRAMEWORK PRINCIPLES

This policy and Framework are guided by the following principles:

4.1 Safeguarding

Governance Links Tanzania is committed to all community members as outlined in the definitions as having the right to safeguarding and protection from sexual exploitation and abuse irrespective of ability, ethnicity, faith, gender, sexuality, and culture. A key principle within this is that all processes are survivor led. Governance Links Tanzania commits to survivors leading the complaint process where it is possible and appropriate to do so.

4.2 Shared Responsibility

For the PSEAH policy and practices to be effective in reducing the risks to beneficiaries and communities, all at Governance Links Tanzania must share the responsibility for implementation and improvement. As such, a failure at one level of the organization constitutes a failure at all levels of the organization.

4.3 Effective Communication

Governance Links Tanzania effectively communicates with all staff, associates, and partners in simple and accessible language to create a positive and accessible culture where responsibilities for PSEAH are clear.

4.4 Dignity and Respect

Governance Links Tanzania creates a work environment where the principles of dignity and respect for all staff, associates, and partners are at the heart of what the organization does. Included in this are the principles of being non-judgmental when hearing the concerns and complaints of survivors of sexual exploitation, abuse and harassment.

4.5 Zero Tolerance

Governance Links has zero tolerance for any forms of sexual exploitation and abuse.

4.6 Confidentiality

Governance Links Tanzania is committed to confidentiality and information will not be shared outside unless it is absolutely necessary, and the safety of the person involved is not a concern.

5.0 POLICY IMPLEMENTATION

5.1 Policy Map

This policy will guide Governance Links Tanzania staff through the definitions of sexual exploitation and abuse as well as governance and responsibilities. The associated procedures will provide information on how to report any complaints, the format of the reporting, and how these complaints will be managed.

5.2 Governance

Executive Director (ED), together with the Board of Directors, has ultimate responsibility for this policy and the PSEAH Framework and its proper management, using a systematic approach. As such, the ED and the Board of Directors will receive a summary of any reported sexual exploitation and abuse incidents and follow-up measures taken at each Management Team meeting and Board meeting, respectively.

5.3 Governance Links Tanzania's Obligations

Governance Links Tanzania believes that all people have a right to live their lives free from sexual exploitation and abuse and will not tolerate its staff, associate, or partners engaging in any sort of behavior that puts beneficiaries or communities at risk. To that end, Governance Links Tanzania commits to:

- i. Creating a safe culture for both those it serves and those who work for and represent the organization,
- ii. Following through on any complaints and concerns in a timely manner and taking each complaint seriously,
- iii. Sensitizing staff, associates, and partners, around how to make a complaint,
- iv. Ensuring zero tolerance towards sexual exploitation, abuse and harassment,
- v. Building a culture of dignity, honor and respect where all those who work with and are served by Governance Links Tanzania feel empowered to report complaints.
- vi. Providing information on how to report complaints and the investigation procedure.
- vii. Ensuring that all staff, associates, and partners have access to the PSEAH policy and procedures as well as all other related policies.
- viii. Providing training to all staff, associates, and partners on PSEAH.

5.4 Staff Responsibility

All staff, associates, and partners are required to adhere to this policy at all times and are obliged to report any suspicions of sexual exploitation and abuse of others. All staff, associates, and partners are required to sign the associated Code of Conduct and an acknowledgment of having read and understood the policy.

5.6 Management Responsibility

Executive Director and Managing team hold overall accountability for this Policy and its Implementation, also have a responsibility to support and develop systems that maintain an

environment where all parties involved with Governance Links understand how to behave, how to raise complaints and concerns, and what action will be taken.

6.0 CONFIDENTIALITY OF COMPLAINT

Governance Links Tanzania will protect the confidentiality of sexual exploitation and abuse allegations to the greatest extent possible in order to protect the integrity of the investigation and prevent embarrassment, further discrimination or harassment, or retaliation.

Confidential or sensitive information obtained by any staff member during the course of an investigation shall not be disclosed to others unless required by law. Concerns of individuals regarding confidentiality of information provided by them will be handled as sensitively as possible, and information shall not unnecessarily be disclosed to others.

7.0 PROHIBITED RETALIATION

Governance Links Tanzania maintains a zero-tolerance policy for retaliation against anyone for reporting sexual exploitation or abuse, assisting in making a complaint, or participating in an investigation. Any staff, associate, or partner who makes a good-faith complaint of sexual exploitation or abuse, assists, testifies, or participates in any investigation or proceeding or who reasonably opposes such conduct in the workplace will not be adversely affected in the terms and conditions of his or her employment and will not be discriminated against or discharged for engaging in such activity. Retaliation not only affects the recipient, but also can spread rapidly throughout. It destroys faith in Governance Links 's leadership and can damage employee morale. Complaints of retaliation will be promptly investigated. If retaliation is substantiated, appropriate disciplinary action, including possible dismissal, will be taken.

Examples of retaliation: Some examples of retaliation include but are not limited to the following:

- i. Termination, demotion, disadvantageous transfers or assignments, refusals to promote, threats, reprimands, or negative evaluations,
- ii. Co-worker hostility or retaliatory harassment, which includes intimidation, gossip, rumors, insults, or otherwise offensive conduct that would subject a person to ridicule or humiliation,
- iii. Any action or combination of actions that is reasonably likely to affect an employee's job performance or opportunity materially and adversely for advancement.

8.0 PSEAH COMMITMENTS

All Governance Links Tanzania staff, associates, and partners are expected to conduct themselves in accordance with the PSEAH policy. Following are the core commitments relating to sexual exploitation and abuse that all staff, associates, and partners are expected to follow.

The following behaviors are prohibited:

8.1 Sexual Activity with Children and Vulnerable Adults

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 in the age of the child is not a defense. Sexual activity with vulnerable adults, as outlined in the definitions, is also prohibited.

8.2 Child Marriage

Any staff, associates, or partners who engage in child marriage (marriage to anyone under the age of 18) will be in violation of the PSEAH policy. As per the definition of child marriage, anyone under the age of 18 is not able to give or withhold consent and is considered a form of sexual violence.

8.3 Sexual Activity with Governance Links Tanzania's Beneficiaries

Sexual activity with any beneficiary is prohibited due to inherently unequal power imbalances. A Governance Links Tanzania beneficiary is defined as anyone who receives services or support from Governance Links.

8.4 Grooming and/or Coercion

Any grooming and/or coercion of a child or vulnerable adult for the purposes of obtaining sex is prohibited.

8.5 Sexual Exploitation

Any form of sexual exploitation is prohibited including:

8.5.1 Buying Sex

Exchange of money, material assistance, employment, goods or services for sex, including sexual favors or other forms of humiliating, degrading or exploitive behavior is prohibited.

8.5.2 Profiting from Sexual Exploitation

Any monetary, social, or political gain from sexual exploitation is prohibited.

8.5.3 Sexual Harassment

Any act of sexual harassment including unwelcome sexual advances or requests for sexual favors is prohibited under the PSEAH policy.

8.5.4 Sexual Violence

Any acts of sexual violence as outlined in the definitions is prohibited. This includes, but is not limited to, sexual violence including intercourse, sexual touching, and threats of sexual violence.

8.6 Physical/Emotional Abuse

As outlined in both the Child Safeguarding and the Adult Safeguarding policies, any physical or emotional abuse is prohibited.

9.0 CONSEQUENCES

Any staff, associate, or partner who is in violation of the PSEAH policy will face disciplinary procedures, which may result in disciplinary action, termination of employment or contract and/or referral to the appropriate law enforcement agency or legal authority.

10.0 PSEAH REPORTING PROCEDURES

The associated procedures document outlines how to report any incidents of sexual exploitation or abuse.

11.0 SUPPORT FOR SURVIVORS

Support will be offered to survivors regardless of the outcome of any investigations. This support can include specialist psychosocial counselling and/or access to other specialist support as needed.

12.0 DEFINITIONS

Child and vulnerable adults

A child is any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood.

Vulnerable adults are defined as:

Those aged over 18 years and who identify themselves as unable to take care of themselves/ protect themselves from harm or exploitation; or Who, due to their gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.

Physical Abuse

Physical abuse occurs when a person purposefully injures or threatens to injure a child or vulnerable adult. This may take the form of slapping, punching, shaking, kicking, burning, shoving or grabbing. The injury may take the form of bruises, cuts, burns or fractures.

Child Emotional Abuse

Emotional abuse is inappropriate verbal or symbolic acts toward a child or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child's self-esteem or social competence.

Neglect

Neglect is the failure to provide a child or vulnerable adult with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being.

Vulnerable Adult Abuse

A Vulnerable Adult is defined as someone who is or may be in need of community care services by reason of mental or other disability, age 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. Vulnerable Adult Abuse can take many forms including physical, sexual, psychological, financial/ material, discriminatory, domestic abuse and self-neglect.

Sexual Abuse

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

Child Sexual Abuse

Child sexual abuse is the involvement of a child in sexual activity that s/he does not fully comprehend, give informed consent to, or for which s/he is not developmentally prepared and cannot give consent, or that violates the laws or social taboos of society. It is evidenced by an activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person. It may include, but is not limited to, the inducement or coercion of a child to engage in any unlawful sexual activity, the exploitative use of a child in prostitution or other lawful sexual practices or the exploitative use of pornographic performances and materials.

Grooming

Grooming is behavior that an offender uses to procure sexual activity from a child. It can include building trust with children and/or their carers to gain access to children to sexually abuse them.

Online Grooming

Grooming may be in person as above, or online where the groomer sends electronic messages with the goal of engaging the child in sexual activity.

Coercion

Coercion covers a whole spectrum of degrees of force. Apart from physical force, it may involve psychological intimidation, blackmail or other threats. For instance, threats of being dismissed

from a job or of not obtaining a job that is sought. It may also occur when a person is unable to give consent. For example, while drunk, drugged, asleep or mentally incapable of understanding the situation.

Sexual Exploitation

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.

Modern Slavery

Slavery is a situation where a person exercises (perceived) power of ownership over another person. Related terms include forced labour, which covers work or services that people are not doing voluntarily but under threat of punishment; human trafficking, which involves deceptive recruitment and coercion; and bonded labour, which is demanded in repayment of a debt or loan. Modern slavery encompasses a spectrum of labour exploitation, ranging from the mistreatment of vulnerable workers to human trafficking to child labour and forced sexual exploitation.

Sexual Violence

Sexual violence is:

- Any sexual act or attempt to obtain a sexual act,
- Unwanted sexual comments or advances or acts to traffic that are directed against a person’s sexuality using coercion by anyone, regardless of their relationship to the victim, in any setting, including at home and at work.

Three types of sexual violence are commonly distinguished: sexual violence involving intercourse (i.e. rape), contact sexual violence (i.e. unwanted touching, but excluding intercourse) and noncontact sexual violence (i.e. threatened sexual violence, exhibitionism and verbal sexual harassment). While coerced sex may result in sexual gratification for the perpetrator, its underlying purpose is to express power and dominance over the other person.

Child Marriage

The custom of marrying young children, particularly girls, is a form of sexual violence as children are unable to give or withhold consent.

Sexual Harassment

Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other conduct that creates a coercive, hostile, intimidating, or offensive work environment. The harassment of a sexual nature may be directed to a person of the same or opposite sex.

The key elements are that the behavior is uninvited, unreciprocated, and unwelcome and causes the person involved to feel threatened, humiliated or embarrassed.

The behavior may also be determined to be sexual violence and harassment if:

- Submission to such conduct is explicitly or implicitly made a term or condition of employment,
- Submission to or rejection of this conduct is used as a basis for an employment decision affecting the staff.
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

Communities

Governance Links works in the inclusivity manner in the community.

Governance Links Staff

Governance Links staff refers to individuals who receive a regular salary for work in full time or part time.

Governance Links Tanzania Associates

Governance Links Tanzania associates refers to a range of paid and non-paid individuals who have committed to work with or support. It includes volunteers, interns, and consultants.

Governance Links Tanzania Managing Team

Governance Links Tanzania managing team refers to Governance Links staff who have responsibility for line managing or supervising the work of Governance Links staff.

Governance Links Tanzania Partners

Governance Links Tanzania partners refers to staff and/or representatives of partner organizations and local government Authorities when operating in partnership agreement with Governance Links.

13.0 Reporting, Openness and transparency

We will report any evidence or reasonable suspicion of violations of this PSEAH policy. Maximum openness and transparency are key to fighting sexual exploitation, abuse and harassment. We shall ensure that all business partners are aware of our zero tolerance and that zero tolerance to sexual exploitation, means that any employee who suspects or knows of specific cases of sexual exploitation and abuse involving other employees, business partners, partners in programmes or projects, volunteers and others with whom Governance Links Tanzania collaborates, is obliged to immediately inform their unit manager/director directly. In case of suspicion or knowledge of specific cases of sexual exploitation and abuse, management makes the decision to notify the relevant authorities - including reporting to the police. This applies to cases in Tanzania and abroad, regardless of how the information came to Governance Links Tanzania's knowledge. Reporting on corruption should follow the procedures provided in the organisation's Whistleblowing policy. Formal contacts in the organisation are

provided below:

<i>Contact title</i>	<i>Telephone</i>	<i>E-mail</i>
Chairperson of the board	+255 754 469 973	njelwa@hotmail.com
Executive Director-	+255754830828	kasongidonald@gmail.com
Head of Finance and Administration	+255 765 853 741	mwaminimtunge@gmail.com
Compliance Focal person	+ 255 769 377 691	Josephinemihama@yahoo.com

14.0 POLICY REVIEW

To meet with sector best practice, Governance Links agrees to review this policy and the entire PSEAH Framework every three years. It is the responsibility of the Executive Director and Management team to conduct this review, in collaboration with any key internal stakeholders or external third-party providers.