



EFICOR'S **Prevention of Sexual** **Exploitation, Abuse,** **and Harassment Policy** **(PSEAH)**



PREVENTION OF SEXUAL EXPLOITATION, ABUSE, AND HARASSMENT (PSEAH) POLICY

OBJECTIVES

The objective is to safeguard Staff, representatives and Community Members from sexual exploitation, abuse and harassment

WHO CAN COMPLAIN?

Aggrieved person / Victim

WHOM TO COMPLAIN TO?

Presiding Officer,
Internal Committee (IC)

HOW TO COMPLAIN?

Call - **8826696123**

OR E-mail:
internalcomplaints@eficor.org

WHAT TO COMPLAIN?

- Sexual Exploitation - Demanding sexual favors in exchange for aid, employment, or benefits.
- Sexual Harassment - Unwelcome physical contact, remarks, gestures, or messages of a sexual nature.
- Non-Consensual Acts - Any forced sexual activity, assault, or coercion.
- Abuse of Power - Misusing authority to intimidate or pressure someone into sexual acts.
- Inappropriate Behavior - Stalking, sharing explicit content, or creating a hostile environment.

COVER PAGE

CONTENTS

Applicability	All EFICOR Stakeholders
Revision date of the policy	15 th March 2025
Recommended by	Governance Standing Committee
Approved by	EFICOR Board
Planned Review Date	15 th March 2028

PREAMBLE:

EFICOR is working to establish a just, responsible, and compassionate society,

- It is committed to promoting an environment that is of mutual respect and understanding.
- It believes in stewardship, transparency, accountability, and inclusivity principles.
- To further the objectives and the principles it embodies, the Board of EFICOR has resolved to create policies and guidelines to achieve its stated objectives.

THE SOURCE OF ITS VALUES, PRINCIPLES, AND PRACTICES

- Our understanding, principles, and practices are guided law of the land.
- Our involvement will be based on the voices of different groups in a community and primary and secondary data.

INTRODUCTION

All humans, regardless of race, religion, ethnicity, indigeneity, disability, age, caste, gender, sexuality, poverty, class, and socio-economic status, hold human rights equally. In fulfilling our responsibilities in light of the above, we affirm everyone's dignity and worth and protect each other's rights, through respectful interactions that seek to not harm.

Sexual exploitation, abuse, and harassment are a violation of basic human rights. EFICOR recognizes that vulnerable adults and children are particularly at risk of sexual exploitation, abuse, and harassment. Sexual exploitation, abuse, and harassment, as well as a range of non-sexual abuses of power, take various forms and can happen to anybody at any time during their lives, but are more likely when one person is in a position of power over another. Therefore, *this policy has been developed to outline our commitment and strategies to prevent and limit the risk of sexual exploitation, abuse, and harassment occurring within our programs or perpetrated by our stakeholders.*

The Constitution of India confers on its citizens a fundamental right to Life. Over a period of time the 'Right to Life' has been reinterpreted by various High Courts and the Supreme Court of India to mean more than a 'mere physical existence' but also to live a 'life with dignity'. Further, the right to work inherently entails the right to work in an environment that is free of harassment of any form. Following the Vishakha judgment in 1997 and the Sexual Harassment of Women at the workplace, Prevention, Prohibition, and Redressal Act, of 2013 it is imperative for organisations to have a policy against any



EFICOR POLICIES

ORGANISATION POLICIES

EFICOR PREVENTION OF SEXUAL EXPLOITATION, ABUSE, AND HARASSMENT (PSEAH)

COVER PAGE

harassment.

CONTENTS

EFICOR as an employer seeks to eliminate any form of sexual harassment from the workplace, which is also consistent with EFICOR's core values of 'Valuing people' and 'Commitment and Character'. EFICOR recognizes that the right to life and right to work entail an employment where it is required that the staff have an environment where they work without fear of being harassed.

GUIDING DOCUMENTS

- UN Universal Declaration of Human Rights
- UN Convention on the Elimination of Discrimination Against Women (CEDAW)
- UN Convention on the Rights of the Child (UNCRC)
- Convention on the Rights of Persons with Disabilities (CRPD)
- The Sexual Harassment Of Women At Workplace (Prevention, Prohibition, And Redressal) Act, 2013
- Handbook on Sexual Harassment of Women in the Workplace issued by the Ministry of Women and Child Development

PURPOSE

The purpose of this Prevention of Sexual Exploitation, Abuse, and Harassment Policy (PSEAH) is to outline the preventative and responsive measures EFICOR has in place to safeguard people against sexual exploitation, abuse, and harassment. This policy aims to achieve this by:

- Demonstrating EFICOR's commitment and approaches to the prevention of sexual exploitation, abuse, and harassment.
- Outlining the expectations and responsibilities of EFICOR stakeholders.
- Providing guidance on how to respond to concerns and allegations; and
- Setting high standards around personal behaviour that must be adhered to by all EFICOR stakeholders.

SCOPE

This policy applies to all EFICOR Stakeholders defined below.

- All EFICOR Staff including project staff.
- All EFICOR Consultants and Contractors.
- All EFICOR Volunteers including but not limited to an office and event-based volunteers.
- All EFICOR Partners (as applicable).
- All EFICOR Board and Society Members.

RELATED POLICIES

This policy should be read and enforced together with:



EFICOR POLICIES

ORGANISATION POLICIES

EFICOR PREVENTION OF SEXUAL EXPLOITATION, ABUSE, AND HARASSMENT (PSEAH)

COVER PAGE

CONTENTS

- EFICOR Child Safeguarding and Protection Policy
- EFICOR Grievance Redressal Policy
- EFICOR Whistle Blower Policy
- EFICOR HR Policy
- EFICOR Gender Policy
- EFICOR Vulnerable Adult Safeguarding and Protection Policy

COMMITMENT

EFICOR is committed to:

- Develop organisation-specific strategies to prevent and respond to sexual exploitation, abuse, and harassment.
- Create a safe working culture for all EFICOR stakeholders.
- Undertake risk assessments to identify areas of risks and mitigation strategies.
- Ensure EFICOR stakeholders are informed regarding the commitments and policies outlined in this document including how to report concerns or allegations.
- Investigate ALL reports of sexual exploitation, abuse, and harassment linked to our stakeholders or EFICOR-funded activities. Concerns or allegations of sexual exploitation, abuse, and harassment will always be taken seriously, investigated, and acted on; and
- Take immediate and appropriate action against EFICOR stakeholders who commit sexual exploitation, abuse, or harassment.

DEFINITIONS

Sexual exploitation, abuse, and harassment (SEAH) may occur against a child or an adult as well as and between people of the same or different genders. It includes situations such as:

- Sexual exploitation and abuse.
- Sexual harassment.
- Child sexual abuse and exploitation.
- Women and men sexually exploited through sex work.
- Possessing, controlling, producing, distributing, obtaining, or transmitting sexually exploitative images of adults and children.¹

Sexual Exploitation - 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 another².

Sexual Abuse - The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual offenses including but not limited to attempted rape (which includes attempts to force someone to perform oral sex); and sexual assault (which includes non-consensual kissing and touching). All sexual activity with someone under the age of consent is considered to be sexual abuse³.

COVER PAGE

CONTENTS

Sexual Harassment - A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favours or engages in other unwelcome conduct of a sexual nature, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated. Sexual harassment can take various forms. It can be obvious or indirect, physical, or verbal, repeated or one-off, and perpetrated by any person of any gender towards any person of any gender. Sexual harassment can be perpetrated against beneficiaries, community members, citizens, as well as staff, and personnel⁴.

Child Abuse - The World Health Organisation defines Child Abuse as: “All forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power.”⁵ WHO, 2006

- Physical abuse is commonly characterised by the physical injury resulting from practices such as punching, beating, shaking, biting, burning, or otherwise harming a child.
- Sexual abuse occurs when an adult or older child, uses their power or authority over the child or takes advantage of the child’s trust to involve them in sexual activity. This sexual activity does not just mean sexual intercourse; it means any sexual activity including flashing, fondling, masturbating, and oral sex.
- Emotional abuse tends to be a chronic behavioural pattern directed at the child/young person whereby their self-esteem and social competence is undermined or eroded over time.
- Neglect is characterised by the failure to provide for the child/young person’s basic needs. This can occur through direct and deliberate action or by omission or deliberate inaction to care for the child/young person.
- Abuse happens to both male and female children of all ages, ethnicity, social backgrounds, abilities, sexual orientation, religious beliefs, and political persuasion. Abuse can be inflicted on a child by both men and women, as well as by young people themselves. In some cases, professionals and other adults working with children in a position of trust also abuse children.

Child Exploitation - Child exploitation includes one or more of the following:

- Committing or coercing another person to commit an act or acts of abuse against a child.
- Possessing, controlling, producing, distributing, obtaining, or transmitting child exploitation material.

¹ AVI, Prevention of Sexual Exploitation and Abuse Policy, 2018, <https://www.australianvolunteers.com/assets/Uploads/ResourceFiles/09c9a5056f/Prevention-of-Sexual-Exploitation-and-Abuse-PSEA-Policy-FINAL-September-2018.pdf>.

² UN Secretariat, Secretary General Bulletin: Special measures for protection from sexual exploitation and sexual abuse, 2003, <https://www.unhcr.org/en-au/protection/operations/405ac6614/secretary-generals-bulletin-special-measures-protection-sexual-exploitation.html>.

³ Department of Foreign Affairs and Trade, Prevention of Sexual Exploitation, Abuse and Harassment Policy, 2019, <https://dfat.gov.au/international-relations/themes/preventing-sexual-exploitation-abuse-and-harassment/Documents/pseah-policy.pdf>.

⁴ Department of Foreign Affairs and Trade, Prevention of Sexual Exploitation, Abuse and Harassment Policy, 2019, <https://dfat.gov.au/international-relations/themes/preventing-sexual-exploitation-abuse-and-harassment/Documents/pseah-policy.pdf>.

⁵ What is child abuse and neglect? | Australian Institute of Family Studies (aifs.gov.au)

COVER PAGE

CONTENTS

- Committing or coercing another person to commit an act or acts of grooming or online grooming⁶.

Fraternisation - Any relationship that involves, or appears to involve, partiality, preferential treatment, or improper use of rank or position including but not limited to voluntary sexual behaviour. It could include sexual behaviour not amounting to intercourse, a close and emotional relationship involving public displays of affection or private intimacy, or the public expression of intimate relations⁷.

Program Beneficiary - A person engaged in, or benefiting from, an EFICOR-approved or funded activity.

Safeguarding - Actions, policies and procedures that create and maintain protective environments to protect people from exploitation, harm, and abuse of all kinds⁸.

Survivor-Centred Approach - A survivor-centered approach prioritises the rights, needs, wishes, and empowerment of survivors of Sexual Exploitation, Abuse and Harassment (SEAH) in both the prevention of and response to SEA. In practice, this means ensuring:

- those who are affected by SEAH have accessible mechanisms to make a complaint that is designed with their needs and contexts in mind;
- SEAH complaints are investigated sensitively and confidentially with primary concern for the survivor; and
- any response is both robust and sensitive to the wishes and protection of survivors.⁹

EFICOR Stakeholders who are in management positions must:

- operate from a survivor centred approach.
- commit to limit the use of non-disclosure agreements within grievance procedures

Third-Party Harassment

If sexual harassment occurs due to the actions or negligence of a third party or outsider toward EFICOR staff or targeted community members, EFICOR will take all necessary and reasonable steps to provide support and implement preventive measures.

Proactive Measures:

EFICOR is committed to ensuring a safe, respectful, and dignified environment for all individuals, including women, men, children, and vulnerable adults, by preventing and addressing **Sexual Exploitation, Abuse, and Harassment (SEAH)**. In alignment with national laws and EFICOR's core values, the following proactive measures will be implemented:

- 1. Policy Dissemination** – The PSEAH policy will be widely circulated to ensure

⁶ AIFS, CFCA Resource Sheet, 2018, aifs.gov.au/cfca/publications/australian-child-protection-legislation.

⁷ Department of Foreign Affairs and Trade, Prevention of Exploitation, Abuse and Harassment Policy, 2019, <https://dfat.gov.au/international-relations/themes/preventing-sexual-exploitation-abuse-and-harassment/Documents/pseah-policy.pdf>

⁸ ACFID, Guidance for the Development of a Prevention of Sexual Exploitation, Abuse and Harassment Policy, https://acfid.asn.au/sites/site.acfid/files/resource_document/Guidance%20for%20the%20development%20of%20a%20PSEAH%20Policy.pdf.

⁹ Australian Council for International Development, https://acfid.asn.au/sites/site.acfid/files/resource_document/Guidance%20for%20the%20development%20of%20a%20PSEAH%20Policy.pdf

awareness and adherence by all staff, representatives, and stakeholders.

2. Internal Committee Formation – EFICOR will establish an **Internal Committee (IC)** responsible for receiving complaints, conducting impartial investigations, and recommending appropriate actions. Additionally, EFICOR will engage with community members from the outset of each project to:

- Clearly communicate expected behaviour from staff and representatives, emphasizing that any form of SEAH is strictly prohibited.
- Develop a **community-led complaint mechanism** with input from community members.
- Document these discussions in community committee meetings.

3. Community Support Mechanism – EFICOR will ensure that targeted community members, including women, men, children, and vulnerable groups, have accessible **reporting channels** to seek assistance and report SEAH incidents for appropriate action.

4. Regular Discussions – SEAH-related issues will be actively discussed in EFICOR meetings to reinforce awareness, prevention, and accountability.

5. Annual Training Plan – EFICOR will develop an annual **PSEAH training plan** and conduct at least **two in-house or virtual training sessions per year** to educate staff, representatives, and partners on PSEAH principles and reporting mechanisms.

6. Awareness Materials – Posters in both local languages and English will be displayed in EFICOR offices and community. These will:

- Encourage staff, representatives, and community members to report SEAH incidents.
- Provide clear contact details of the responsible authorities.

7. Complaint Process Awareness – A poster outlining complaint and reporting process for SEAH cases will be displayed in EFICOR offices and community to ensure that all stakeholders know how to report concerns.

8. Public Awareness Campaigns – EFICOR will actively publicize that **SEAH is a serious violation of human rights and must not be tolerated**. Awareness materials, including posters and a **clear flowchart detailing the complaint and redressal process**, will be widely shared.

Who Can Make Complaints

EFICOR is committed to ensuring that all individuals, regardless of gender, age, or ability, have access to safe and confidential reporting mechanisms. Complaints of **Sexual Exploitation, Abuse, and Harassment (SEAH)** can be made by:

1. **The aggrieved person** – Any individual who has experienced SEAH.
2. **If the aggrieved person is unable to write the complaint, it may be made by:**
 - A **relative or friend**.
 - A **co-worker**.
 - An **officer from the National Commission for Women or the State Women's Commission**.
 - **Any other individual** who has knowledge of the incident, **with the written**

COVER PAGE

CONTENTS

consent of the aggrieved person, may submit a complaint to the **Internal Committee (IC)**.

3. If the aggrieved person is unable to file a complaint due to mental incapacity, the complaint may be made by:

- A **relative or friend**.
- A **special educator**.
- A **qualified psychiatrist or psychologist**.
- A **guardian or an authority** under whose care the person is receiving treatment or support.
- **Any person with knowledge of the incident**, in collaboration with any of the above individuals, may also file a complaint.

4. If the aggrieved person is deceased, any person with knowledge of the incident may file a complaint **with the written consent of the legal heir**.

RECRUITMENT AND SCREENING

EFICOR recruitment practices aim to recruit the safest and most suitable staff and volunteers and deter those who wish to cause harm to people from seeking engagement with EFICOR. The following screening measures are required for all short-listed candidates or applicants:

- Police Check
- Reference Checks: A minimum of two non-related referees will be contacted verbally and asked specific questions regarding any concerns of sexual misconduct.
- Confidential Reference Check with the previous employer of the candidate.

TRAINING AND AWARENESS

All EFICOR stakeholders have a role to play in safeguarding the rights and protection of people from all forms of abuse, exploitation, and harassment. Therefore, EFICOR is committed to ensuring we equip and train all our stakeholders to outwork this responsibility and promote the protection and rights of those in contact with our programs and people.

EFICOR will ensure all stakeholders:

- Receive this policy and relevant induction training at the commencement of their engagement with EFICOR; and
- Sign and agree to abide by the policy, including through contracts and [partnership agreements/MOUs].
- Have access to resources to support the implementation of this policy [including tools and templates, training, and coaching.]

REPORTING

1. Filing a Complaint

- The complainant must submit a detailed complaint to the **Internal Committee**

COVER PAGE

CONTENTS

(IC) using the **Confidential Incident Reporting Form** (Annexure I).

- The complaint should include a request for investigation, relevant details, supporting documents (if any), and a list of witnesses.

2. Reporting Channels

- Complaints can be submitted through the designated **complaint number: 8826696123** or via email at **internalcomplaints@eficor.org**.
- Complaints may be made **orally or in writing**. If a complaint is made orally, an **Internal Committee member** receiving the complaint must document it in writing and have it authenticated by the complainant with their **signature or thumb impression, along with the date**.

3. Complaint Screening and Investigation

- Upon receiving a complaint, the **Internal Committee (IC)** will form a **Complaint Screening Committee** from within its members to begin the inquiry.
- This committee will consist of **3 to 4 members** and should **ideally include an external member** of the Internal Committee to ensure impartiality.

EFICOR is committed to providing a safe, supportive, and secure environment to report SEAH. EFICOR will take all concerns seriously and respond immediately. All reports of SEAH will be recorded.

EFICOR stakeholders must immediately report (within 48 hours) any concerns, suspicions, or allegations of sexual exploitation, abuse, harassment, or breach of this policy. This includes any concerns, suspicions, or allegations involving an employee/volunteer or any incident occurring within an EFICOR-funded activity.

Community members or any other external person are also strongly encouraged to report any concerns and to immediately notify EFICOR if they, or someone they know, is thought to have been the victim/survivor of sexual exploitation, abuse, and harassment perpetrated by an EFICOR stakeholder or within an EFICOR program or funded activity.

A report should be made to (Chairperson- Internal Complaints Committee):

Email: internalcomplaints@eficor.org

Phone: 9599223869

Address: EFICOR, 308, Mahatta Tower, B-Block Community Centre,
 Janakpuri, New Delhi – 110058

INVESTIGATION

When an allegation, belief, or suspicion of sexual exploitation, abuse, or harassment is reported, EFICOR Internal Committee will act immediately by launching an investigation. If the incident involves a child, EFICOR Child Safeguarding and Protection Policy will be followed.

COVER PAGE

CONTENTS

All reports will be investigated following the procedure stated below, irrespective of the identity of the alleged perpetrator. When applicable, the incident is reported to the police, government agencies, or other relevant organisations.

During the investigation:

1. Formation of Complaint Screening Committee

- Upon receiving a complaint, the Internal Committee (IC) Chairperson will form a Complaint Screening Committee from among the IC members.
- The Chairperson will lead the Complaint Screening Committee, which will be responsible for conducting the inquiry.
- The committee will ideally include the external member of the IC to ensure impartiality.

2. Investigation Process

- The Chairperson will provide a copy of the complaint to the accused (staff or representative), requesting a written response within seven (7) working days from the date of receipt.
- The accused must submit their written response within ten (10) working days of receiving the complaint.
- If the accused fails to submit a written response or fails to appear before the IC for three consecutive hearings, the Committee may proceed with ex parte proceedings (i.e., making a decision in their absence).

3. Ensuring Impartiality

- All investigations will be conducted fairly and impartially.
- If any IC member involved in the investigation is also implicated in the allegation, has a close working relationship, or shares a personal connection with either the complainant or the accused, they will be replaced to ensure neutrality.

4. Compliance with Legal and Ethical Standards

- The Chairperson will ensure that relevant laws and legislative procedures are followed throughout the investigation.
- External legal advice will be sought if necessary to ensure compliance with national and international safeguarding standards.

5. Respect and Support for All Parties

- Both the victim/survivor and the accused will be treated with dignity and respect throughout the investigation process.
- External counselling will be offered, if required, to either party.
- EFICOR will be guided by the wishes and choices of the victim/survivor while ensuring due process is followed.
- A gender-appropriate translator or liaison person will be arranged as needed.

6. Temporary Suspension and Employment Considerations

- If deemed necessary, the accused may be temporarily suspended from duty, or their partnership with EFICOR may be put on hold during the investigation.
- This does not imply guilt or innocence.
- If the accused is an employee, they will continue to receive their full salary and entitlements during the suspension.

7. Dealing with Allegations Involving EFICOR Partners

- If the accused is from a partner organization and if it is determined that suspension is in the best interest of the affected individuals, EFICOR may temporarily suspend the partnership until the investigation is concluded and an appropriate resolution is reached.
- If the partner organization is uncooperative, EFICOR may terminate the partnership.
- All investigations will be treated with high priority.

8. Principles of Natural Justice

- The IC will uphold the principles of Natural Justice in its proceedings.
- No third-party representatives, including legal practitioners, will be permitted to represent either the complainant or the accused, except in the event of the complainant's death, where their legal heir may represent them.

9. Final Report and Recommendations

- The IC will document its findings and recommendations in a final report, which must be signed by the Chairperson and at least three (3) other committee members.
- The report will be submitted to the Executive Director (ED) for further action.
- If the accused is the Executive Director, the report will be submitted to the Board Chairperson for appropriate action.

What happens if the incident is proven or suspicion credible?

In the event that an incident has been proven or there is credible suspicion, EFICOR parties, including the Executive Director and members of the Board as necessary, will determine what action should be taken based on the severity of the allegation and in consultation with relevant parties following the investigation process. In the result of a proven incident or credible suspicion the following outcomes are possible:

Minor Breaches:

- Responses may include providing further education regarding this policy, the importance of PSEAH, and outlining the consequences of ongoing non-compliance.

Serious Breaches:

- Termination of employment or association with EFICOR.
- Referral to law enforcement authorities as appropriate (as per national and any mandatory reporting laws)
- If an incident involves an EFICOR partner and reasonable action is not taken to



EFICOR POLICIES

ORGANISATION POLICIES

EFICOR PREVENTION OF SEXUAL EXPLOITATION, ABUSE, AND HARASSMENT (PSEAH)

COVER PAGE

address the concern, EFICOR will end the partnership.

CONTENTS

SURVIVOR SUPPORT AND ASSISTANCE

Presiding officer of internal committee of EFICOR will ensure survivors of sexual exploitation, abuse, and/or harassment are offered support and assistance, such as referral to safe health/medical, psychosocial, and legal/justice services where appropriate and, where required, to specialised children or women's facilities. EFICOR will develop terms of reference with a legal expert, medical doctor and a counselor to provide support to SEAH victims as needed.

BREACH OF POLICY

Sexual exploitation, abuse, and harassment constitute acts of gross misconduct and are therefore a breach of this policy potentially grounds for termination of employment or association with EFICOR. Any reported or suspected policy breach will be managed per the investigation procedures outlined above.

FALSE COMPLAINTS

In the event of internal committee finds that a false complaint has been made it may send its finding to the Executive Director who will take the appropriate action under the HR Policy and the law of the land.

WITHDRAWAL OF COMPLAINT

The complainant may withdraw his/her complaint in writing at any time during the complaints receiving and/or inquiry procedure stating that they are doing so of their own volition and without and force or threat.

REVIEW

This policy will be reviewed every three years. The Executive Director of EFICOR will manage the review under the guidance of the Board of EFICOR and stakeholders will be consulted during this process.

COMMITMENT & DECLARATION

I, _____, have read and understood the above Prevention of Sexual Exploitation, Abuse, and Harassment Policy and agree to adhere to it and the associated procedures in their entirety.



EFICOR POLICIES

ORGANISATION POLICIES

EFICOR PREVENTION OF SEXUAL EXPLOITATION, ABUSE, AND HARASSMENT (PSEAH)

COVER PAGE

CONTENTS

Sign: _____

Date: _____

APPENDIX 1: PSEAH Code of Conduct

All EFICOR Stakeholders must uphold and promote the highest standards of ethical and professional conduct and abide by EFICOR policies.

All EFICOR Stakeholders will NOT:

- physically assault or physically abuse children or vulnerable adults.
- develop inappropriate relationships whether physical/sexual relationships with children or vulnerable adults which may be deemed exploitative or abusive.
- abuse or exploit children under the age of 18 in any way and will report any such behaviour of others to the line management and/or Convener, Vulnerable Adult/Child Safeguarding Committee.
- abuse or exploit or engage in inappropriate or sexual behaviour with any members of affected communities regardless of age, especially the vulnerable adults.
- put themselves in a position where they could be accused of sexually abusing a child, young person, or vulnerable adult, i.e., holding or hugging a child, young person, or vulnerable adult, or physically touching children, young persons, or vulnerable adults in a way that could be considered abusive in ways described in the Policy documents.
- act in ways that may be abusive or may place a child or vulnerable adult susceptible to abuse.
- use language, make suggestions, or offer advice, which is inappropriate, offensive, or abusive.
- offer benefits such as food, favours, clothes, jobs, money or show favouritism in exchange for sexual favours.
- act in ways intended to shame, humiliate, belittle, or degrade children or vulnerable adults, or otherwise perpetrate any form of emotional abuse.

All EFICOR Stakeholders MUST:

- make appropriate arrangements to ensure that children and vulnerable adults are not put in a situation that can compromise their safety.
- behave appropriately and respectfully towards all guests and representatives staying in accommodations associated with EFICOR's work.
- use the Grievance Redressal guidelines and mechanisms to share grievances with the concerned authorities through the following email addresses: whistleblowing@eficor.org or safeguarding@eficor.org.
- plan activities so that more than one person is present or, at least, other people are within sight and hearing when interacting with children and vulnerable adults. Wherever possible I will ensure that another adult is present to supervise the activity.



EFICOR POLICIES

ORGANISATION POLICIES

EFICOR PREVENTION OF SEXUAL EXPLOITATION, ABUSE, AND HARASSMENT (PSEAH)

COVER PAGE

CONTENTS

- Immediately inform EFICOR Zonal Implementer if they become engaged in a personal relationship that may be perceived as inappropriate or exploitative, including fraternisation, or where real or perceived unequal power dynamics exist. Workers who are unsure if their relationships fall into this category should discuss the situation with EFICOR Staff.

EFICOR strongly discourages any stakeholders from engaging in such a relationship with a program beneficiary due to the inherent conflict of interest and potential for abuse of power. Such relationships can undermine the credibility and integrity of EFICOR's work.

EFICOR Stakeholders who are in management positions **MUST**:

- operate from a survivor centred approach.
- commit to limiting the use of non-disclosure agreements within grievance procedures.

APPENDIX 2: CONFIDENTIAL INCIDENT REPORTING FORM

In accordance with EFICOR reporting procedures, any incident, belief, or suspicion of sexual exploitation, abuse or harassment violation is to be reported and the information passed on to the Executive Director, EFICOR. This includes non-compliance with the EFICOR Prevention of Sexual Exploitation, Abuse or Harassment Policy. Activities or practices in EFICOR projects that do not protect the best interests of the victim/survivor or do not meet applicable local laws or standards must also be reported.

Please note:

- In no way, nor under any circumstances, is anyone to attempt to persuade someone not to notify, or even to delay notifying, authorities in the case of sexual exploitation, abuse, and harassment concern.
- It is not your responsibility to investigate even for the purpose of gathering information for this form. It is sufficient to just report on what you observed, were aware of, or were told.

PART ONE: ABOUT YOU (Note: This form is to be filled out by the person making the report)

Name: _____

Contact Details (e.g., phone, email, address): _____

Relationship with EFICOR (e.g., Employee, Volunteer, etc.): _____



EFICOR POLICIES

ORGANISATION POLICIES

EFICOR PREVENTION OF SEXUAL EXPLOITATION, ABUSE, AND HARASSMENT (PSEAH)

COVER PAGE

CONTENTS

Relationship with the person: _____

PART TWO: VICTIM/SURVIVOR DETAILS

Name (s): _____

Age: _____ Gender: F / M

Any other relevant details or issues to be aware of (e.g., cultural issue, disability, ethnicity, religion, etc.):

Who does the individual live with (include address and contact details)? _____

Is the individual aware of this referral? Yes/No

Is the parent/guardian aware of this referral? Yes/No

Where is the individual now? Is s/he in a place of safety and are there any immediate medical issues?

PART THREE: YOUR CONCERN

Sexual Exploitation, Abuse or Harassment concern:

- Observed/suspected by yourself.
- Disclosure by the person
- Allegation made by (name & details) _____



EFICOR POLICIES

ORGANISATION POLICIES

EFICOR PREVENTION OF SEXUAL EXPLOITATION, ABUSE, AND HARASSMENT (PSEAH)

COVER PAGE

CONTENTS

Date(s), time(s) and location(s) of incident(s): _____

Who is the person suspected?

- EFICOR Staff or another representative
- Staff of EFICOR Partner organisation
- Someone in the community where EFICOR is working.
- Consultants or third-party working for EFICOR on a temporary basis.

Name and other relevant details of a person suspected (e.g., address, job position, relationship with the person, etc.):

Details of Report

Please include the following:

- Details of the sexual exploitation, abuse, or harassment concern or incident (Include what is alleged to have happened? What were the circumstances, etc.)
- Write down exactly what the victim/ survivor has said (in his/her own words) and what you said (NB: Do not ask the victim/survivor leading question-record actual details)
- Observations made by you (e.g., observed injuries, person's perceived emotional state, etc. Mark which observations are fact or opinion)

Have local authorities/external agencies been notified? Yes/No

Date of notification: _____

Explain (e.g., name of authorities/agency, advice received, actions, etc.):



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COVER PAGE

CONTENTS

Signature: _____

Date: _____

PART FOUR: TO BE FILLED OUT BY (EFICOR (INSERT RELEVANT POSITION TITLE))

Date matter was referred: _____

Date responded to complainant: _____

Investigation: How was the investigation conducted? Who was involved in the investigation, roles, and responsibilities? Include key dates of investigation.

Findings & Comments:

Actions: Include action taken and any continued follow-up needed.

Organisational Change Opportunities Identified: Strengths and weaknesses in areas such as the PSEAH Policy, its implementation, and management, etc.



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COVER PAGE

CONTENTS

Recommendations: To prevent possible sexual exploitation, abuse, and harassment violations and improve the investigation process in the future.

Report prepared by: _____

Signed: _____

Date: _____

(INSERT RELEVANT POSITION TITLE) Name: _____

Signed: _____

Date: _____

APPENDIX 3 REFERRAL FORM:

Confidential Document

(To be used for referring individuals to appropriate services as per the safeguarding policy and POSH Act)

Section 1: Basic Information

1. Date of Referral: _____
2. Referring Officer's Name: _____
3. Designation: _____
4. Contact Information:
 - Phone: _____
 - Email: _____
5. Complainant/Survivor's Name: _____ (Optional for



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ORGANISATION POLICIES

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COVER PAGE

CONTENTS

confidentiality)

6. Gender of Complainant/Survivor: _____

7. Date of Incident: _____

Section 2: Referral Details

1. Type of Assistance Required (Tick all that apply):

- Medical Assistance
- Legal Assistance
- Counselling/Psychological Support
- Other (Specify): _____

2. Reason for Referral:

3. Urgency Level:

- High (Immediate intervention required)
 - Moderate (Within 24-48 hours)
 - Low (Standard process)
- _____

Section 3: Service Provider Details

1. Referred Service Provider Name: _____

2. Type of Service Provider (Tick one):

- Medical Facility (e.g., Hospital/Clinic)
- Legal Aid Service
- Counselling Centre
- Other (Specify): _____

3. Contact Person at Service Provider: _____

4. Contact Details:

- Phone: _____
- Email: _____

5. Address of Service Provider:

Section 4: Consent and Confidentiality

• Consent from Complainant/Survivor (Mandatory):

o I, _____, provide my informed consent for this referral and understand the purpose and process of the services being referred.

o Signature: _____

o Date: _____

• Confidentiality Statement:

o This referral form and any associated documents are confidential and will only be shared with authorized personnel or service providers directly involved in addressing the complaint.

Section 5: For Internal Use Only

1. Referral Follow-Up by ICC/Referring Officer:

o Date Contacted Service Provider: _____



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ORGANISATION POLICIES

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COVER PAGE

CONTENTS

o Status of Service:

- Completed
- In Progress
- Pending

2. Remarks:

3. Name of ICC/Referring Officer: _____

4. Signature: _____

5. Date: _____

EFICOR
308, Mahatta Tower
B – Block
Community Centre
Janakpuri
New Delhi
110 058
hq@eficor.org
www.eficor.org