



TRICKLE UP PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE (PSEA) POLICY¹

Author:

Caroline Werner

Legal review done by:

Paul Weiss (Edwin Maynard, Liza Velazquez, Maria Keane and Nick Butto)

Board review done by:

Barbara Schatz

Internal review completed by the following Trickle Up staff:

William Abrams, President

Barbara Jackson, Vice President, Programs

Mike Castlen, Vice President, Planning and Operations

Yerefolo Malle, Jorge Coy, Sushant Verma (Regional Representatives)

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¹ Confidentiality: Public.

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HOW TO USE THIS DOCUMENT

All Trickle Up employees and Board Members should:

- Read this document and certify (via Form 1) that you have received and understood it;
- Identify your specific responsibilities;
- Refer to the online version on an as-needed basis; and
- Review it at least once a year.

All Trickle Up volunteers should:

- Read this document before commencing volunteer activities and certify (via Form 1) that you have received and understood it;
- Identify your specific responsibilities; and
- Refer to the online version on an as-needed basis.

A. WHY DO WE NEED A PSEA POLICY?

Trickle Up has a duty of care that it owes its Representatives² and Program Participants, and a responsibility to ensure that such persons are treated with dignity and respect. We believe all people, regardless of race, gender, religion, color, national or ethnic origin, language, marital status, sexual orientation, age, socioeconomic status, disability, political conviction, or any other distinguishing feature, have a right to live their lives free from Sexual Exploitation and Sexual Abuse. We recognize that there are unequal power dynamics across any organization and in relation to those we serve, and that we face an inherent risk of some individuals exploiting their positions of power for personal gain. Trickle Up has a zero-tolerance policy toward Sexual Abuse or Sexual Exploitation occurring in the context of its work. Therefore, Trickle Up needs a PSEA policy to help protect those individuals while they are engaged in work to achieve Trickle Up's mission.

This policy will help guide Trickle Up Representatives, Program Participants, and, in some cases, Partners in the event of any sexual exploitation or abuse incident. The policy combines best practices from our current actions with industry best practices – especially the Interaction CEO Pledge on Preventing Sexual Abuse, Exploitation, and Harassment by and of NGO Staff,³ to which Trickle Up is a signatory – and takes into account relevant principles of international law.

It is not an individual Representative's responsibility to decide whether or not Sexual Abuse or Sexual Exploitation has occurred.

This policy reflects industry best practices as well as the needs of Trickle Up. This policy will automatically apply in the United States and in all regional locations where Trickle Up works.⁴ It must be used in conjunction with Trickle Up's PSEA Procedures (meaning the Forms and Annexes attached to this PSEA Policy). This policy does not form part of an

² Note that all capitalized terms are defined in the "Defined Terms" section of this document.

³ Interaction Pledge on Preventing Sexual Abuse, Exploitation, and Harassment by and of NGO Staff, available at: <https://www.interaction.org/document/ceo-pledge-preventing-sexual-abuse-exploitation-and-harassment-and-ngo-staff>.

⁴ The scope of this policy is worldwide, except in countries where the following policy contravenes local legislation. In these cases, local legislation must be followed with guidance from the Safeguarding Team. This policy will apply in the event that it is more stringent than local legislation.

employee's terms and conditions of employment and may be subject to change at the discretion of Senior Management.

If in doubt about anything in this policy, please seek further advice from the Vice President, Planning and Operations.

B. PURPOSE OF THIS POLICY

This policy sets out Trickle Up's approach to preventing sexual exploitation and abuse. It sets out:

- the principles upon which we will base our decision making and actions,
- our expectations of all Representatives of Trickle Up, and
- our commitments to ensure effective action is taken when problems occur.

C. TRICKLE UP PSEA PRINCIPLES

At Trickle Up we believe all people have a right to live their lives free from Sexual Abuse and Sexual Exploitation, regardless of age, gender, sexuality, disability, religion, or ethnic origin. Such behavior goes against the very beliefs, values, and mission of our organization. Safeguarding against such acts is a priority for Trickle Up.

Sexual Abuse and Sexual Exploitation, 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 to occur when one person is in a position of power over another. Trickle Up recognizes that this can happen in workplaces and that organizations working with vulnerable populations face an inherent risk of some individuals exploiting positions of power.

In some countries, homosexuality is illegal and LGBTI people face significant discrimination. Trickle Up does not discriminate on the basis of sexuality or gender, and recognizes its duty of care to provide support to manage the risks which can be associated with being openly non-heterosexual in some parts of the world.

Trickle Up commits to:

- Create a safe working culture for all those whom Trickle Up serves and those working for and representing the organization.
- Ensure that all concerns or allegations of Sexual Abuse or Sexual Exploitation are responded to in a timely and appropriate manner and there are multiple channels through which staff and other stakeholders can raise concerns.
- Ensure zero tolerance of Sexual Abuse and Sexual Exploitation in the organization through robust prevention and response work, offering support to survivors and victims, and holding those responsible to account.
- Recruit personnel who will commit to and abide by this policy. Trickle Up is committed to preventing the hiring or re-employment of staff who have committed past infractions that constitute Sexual Exploitation or Sexual Abuse per this policy.
- Adopt a survivor-centric approach that respects the confidentiality and decision-making rights of survivors where possible and appropriate to do so.

- Build a culture where all those whom Trickle Up serves and who work for Trickle Up feel empowered to insist on non-discriminatory and respectful behavior from each other, where poor behavior is not accepted, and where power is not abused.
- Be transparent about Safeguarding issues occurring within Trickle Up, sensitive in our communications about our practices and open to learning and improving.
- Empower survivors and complainants by helping them explore their options in safe ways without imposing our own opinions.
- Be non-judgmental: we never judge survivors or complainants for their actions or decisions.
- Maintain confidentiality when carrying out our work. Sensitive information related to this policy will only be communicated via the mechanisms set forth herein.
- Carry out independent and discrete investigations, recognizing the rights and duties of care to everyone involved, including the complainant or survivor, witnesses, and the person accused.
- Strive for inclusion as an ultimate goal. This policy must not be used as a mechanism for disparate treatment. This applies both professionally (e.g., prohibiting members of certain protected classes or characteristics from participating in or receiving business-related tasks) and socially (e.g., ostracizing any member of a protected class or characteristic and affecting their ability to participate in social or other Trickle Up gatherings).
- Strive to meet the highest standards of our sector, including seeking feedback and pursuing continuous improvement.
- Ensure that a) All Representatives, and using Trickle Up's reasonable best efforts, Partners and Program Participants, will have access to information about how to report concerns or allegations of Sexual Abuse and Sexual Exploitation b) Concerns or allegations of Sexual Abuse or Sexual Exploitation will always be taken seriously, investigated and acted on if appropriate, in line with our Safeguarding principles set out above

All Representatives will have access to, and be familiar with this policy and know their responsibilities within it. All staff will receive training in relation to PSEA. In addition, staff with supervisory responsibilities will receive additional training commensurate with their role. All Regional Representatives are responsible for promoting awareness of this policy within their offices.

This PSEA will be used in conjunction with relevant employment/labor laws and criminal laws to make decisions about how to respond to complaints and concerns that are raised.

D. ROLES AND RESPONSIBILITIES

Responsibility of all Personnel.

- Creating a safe working environment at Trickle Up by adhering to this policy.
- Report any suspicions of Sexual Abuse or Sexual Exploitation of others or any violations of this policy that occur in the context of Trickle Up's work. This can be done without sharing details of cases where information has been shared in confidence. Failure to report a suspicion of abuse relating to someone else is a breach of Trickle Up's policy and could lead to disciplinary action being taken.
- Individuals are encouraged to report instances wherein that individual him or herself is the target of the abuse, but an individual has no obligation to report in this case.
- If an individual confronts you personally and alleges that you violated this policy, then you must inform your manager immediately.
- When reporting abuse, you should create a signed and dated record of the details as you know them using Form 2 and send them to the Vice President, Planning and Operations.

All those accused will be treated with respect and all allegations will be treated confidentially to the extent possible.

Responsibility of the Vice President, Planning and Operations.

The Vice President, Planning and Operations holds overall accountability for this PSEA policy and its implementation and is responsible for:

- Reviewing and updating this PSEA policy on a regular basis, and for keeping it consistent with legislative and organizational developments.
- Answering questions about this policy and offering further support, on an as-needed basis, to help implement this policy.
- Ensuring that application forms reference this policy and require adherence to it.

Responsibility of any Trickle Up Representative in a Managerial Role.

- Provide this PSEA policy to all Representatives and use best efforts to answer questions pertaining to this policy; provide the necessary training needed to support this PSEA policy, and ensure this PSEA policy is translated into French and Spanish.
- Support and develop systems that maintain an environment in which Representatives, and to the extent practical, Partners, know how Trickle Up expects them to behave, how they can raise complaints and concerns, and that Trickle Up will take action when they do.

- Use their reasonable best efforts to prevent the hiring or re-employment of employees who have committed past infractions that constitute Sexual Exploitation and/or Sexual Abuse per this policy. To prevent the hiring of such staff, each manager making a hiring decision on behalf of Trickle Up shall use his or her reasonable best efforts to hire employees with no past history of Sexual Abuse, Sexual Exploitation, or related misconduct. To the extent possible, each manager making a hiring decision on behalf of Trickle Up shall, if legally permissible in the area, (i) ask all prospective employees if they have been found in violation of any local laws related to Sexual Exploitation or Sexual Abuse (ii) ask prospective employees' references whether such infractions have occurred in the prospective employee's past and ask prospective employees' references the reason why the employee departed from the prior employer; (iii) reserve the right to conduct a criminal or other related background checks for each prospective employee, and (iv) conduct a sexual misconduct background search using all information readily available, including any databases of sex crimes perpetrators in the area⁵. As set forth in Trickle Up's Employee Handbook, Trickle Up is committed to providing equal opportunities in recruitment and hiring. To prevent the re-hiring of former Trickle Up employees who were dismissed for violation of this policy, Trickle Up managers who are contacted by other organizations to provide references must disclose, to the extent legally permissible⁶, the reason for such employee's dismissal. Once a Trickle Up manager agrees to provide a reference, such reference must not contain any misleading information.
- Offer support to survivors and victims, regardless of whether a formal internal response is carried out (such as an internal investigation). Support includes, as appropriate, medical support, specialist psychosocial counselling, and/or access to other specialists and appropriate support as needed. Survivors and victims can choose if and when they would like to take up the support options available to them. Survivors and victims can choose if and when they would like to take up the support options available to them.

⁵ For example, the Latin America office has advised that there is National Registration of Sex Offenders database in Guatemala called RENAS, and the Latin America office commits to using RENAS during their hiring practice.

⁶ And to the extent the accuser waives any confidentiality he or she may have requested during the investigation.

E. BARRED SEXUAL BEHAVIOR

All Trickle Up Representatives shall conduct themselves in accordance with the following core policies. This is not an exhaustive list and further details can be provided by Trickle Up's management teams.

Sexual Activity that is Always⁷ Barred.

a. Sexual Activity with Children

Representatives shall not have sexual relationships with children, which is anyone under the age of 18 years (or older if the local law indicates as such).⁸ Mistaken belief of age is no defense.

b. Sexual Activity with Trickle Up Beneficiaries

Representatives shall not engage in any form of sexual activity with Trickle Up's Program Participants.

Sexual Activity that is Barred in a Work Context: Transactional Sex

Representatives shall not engage in Transactional Sex (i) with any person related in any way to the work of Trickle Up; or (ii) on any premises associated with the work of Trickle Up, even if the Transactional Sex is not conducted with a person related in any way to the work of Trickle Up; or (iii) while on any travel conducted for the purposes of Trickle Up, even if the Transactional Sex is not conducted with a person related in any way to the work of Trickle Up; or (iv) if such Transactional Sex is illegal, even if the Transactional Sex is not conducted with a person related in any way to the work of Trickle Up.

Sexual Activity That May Be Barred.

a. Sexual Activity with Other Trickle Up Colleagues

Representatives shall not engage in sexual activity with people whom they manage or supervise and, in the case of the President or those at the Regional Representative or Vice

⁷ This means the activity is barred even if the activity is conducted in a context completely unrelated to the work of Trickle Up.

⁸ If an individual is married to a child, Trickle Up's Safeguarding Team will meet to discuss whether waiver of this provision is applicable.

President level, any more junior staff in their direct management line. Trickle Up's policy does not prohibit its Representatives from beginning relationships with each other outside of the unequal power dynamics explained above, but all Representatives engaged in or beginning relationships with other Representatives must declare their relationships as soon as possible to their supervisors, even if the relationship is at an early stage and may not continue. Disclosures will be treated confidentially. As long as relationships are conducted appropriately (meaning in accordance with the points below), such relationships may be in compliance with this policy. Trickle Up's Senior Management Team reserves the right to approve or deny budget or travel proposals that, in the Senior Management Team's opinion, may be inappropriate due to the sexual relationship between Representatives. Those in such relationships must:

- Behave professionally and conduct their relationships in a way that does not negatively impact Trickle Up business.
- Ensure they do not make work decisions based on that relationship. This may include Representatives who share responsibility for sign off on the same budget lines; or are involved in carrying out joint decision making relating to resourcing or program issues; or are carrying out or acting as decision makers for internal investigative processes.
- Ensure that their relationships do not lead to fraudulent or corrupt behaviors. For example, if Representatives choose to conduct travel at the same time as each other without having a valid business need for such travel, they will be committing fraud.

b. Sexual Activity with Staff from Trickle Up's Partners, Vendors, Suppliers, and Donors

Representatives shall not engage in sexual activity with staff from its Partners where this would constitute an abuse of power. All such relationships must be disclosed as soon as possible to supervisors, even if the relationship is at an early stage and may not continue. Disclosures will be treated confidentially. As long as relationships are conducted appropriately (meaning in accordance with the points below), such relationships may be in compliance with this policy. Those in such relationships must:

- Behave professionally and conduct their relationships in a way that does not negatively impact Trickle Up business (meaning Trickle Up shall not suffer any financial or other harm as a result of the relationship).
- Ensure they do not make work decisions based on that relationship. This may include two such persons who share responsibility for sign off on the same budget lines; or are involved in carrying out joint decision making relating to resourcing or program issues; or are carrying out or acting as decision makers for internal investigative processes.
- Ensure that their relationships do not lead to fraudulent or corrupt behaviors. For example, if two such persons choose to conduct travel at the same time as each other without having a valid business need for such travel, they will be committing fraud.

F. HOW TO RAISE A COMPLAINT OR CONCERN

Anyone can raise a concern or make a complaint to Trickle Up about something they have experienced or witnessed. You can do this (i) verbally by reporting to either your supervisor, your Regional Representative, the President, the Vice President, Programs, or the Vice President, Planning and Operations; (ii) in writing by filling out Form 2 or (iii) anonymously via the anonymous reporting link on the Trickle Up website <https://trickleup.org/report-abuse/>. Anonymous reporting ensures confidentiality to the maximum extent possible and the ability to raise a concern without fear of retribution. Those who report suspected abuse or supervisors who are informed of suspected abuse should not (i) contact the suspected person to investigate the matter independently or (ii) demand restitution.

G.PROCEDURE FOR HANDLING COMPLAINTS AND CONCERNS

Within 72 hours of receiving a complaint or concern, the Vice President, Planning and Operations must convene a case conference with the Safeguarding Team, which consists of the Vice President, Programs, the Vice President, Planning and Operations, and the Safeguarding Board Representative. The Safeguarding Team will prepare a summary of the incident and the decisions made in their conference. They will, if they think it appropriate, consult with one or more of the following: (i) the President, (ii) outside counsel, and/or (iii) the Independent Third Party Investigatory Board. They must consult with the Independent Third Party Investigatory Board if the complaint or concern is material, and they shall follow investigatory procedures set forth in slides 30-41 of the Investigation Management and Competencies presentation⁹. After any such consultation, the Safeguarding Team will make a final determination of any necessary disciplinary actions.

The Vice President, Planning and Operations, shall send an email to the complainant acknowledging receipt of the complaint as soon as possible.

The Vice President, Planning and Operations must refer (i) suspected cases of Child Abuse or Vulnerable Adult abuse and (ii) cases in which a person's life is in danger to local statutory authorities, unless the Safeguarding Team, in consultation with both outside counsel and local protection actors with relevant experience, determines that doing so is not in the best interest of the survivor or may expose him/her to further risk of harm. Any decision to this end will be fully documented. The decision about whether to refer to local police or statutory authorities in other cases is made by the person who it is alleged has been the subject of abuse ("the victim/survivor" - who may or may not be the complainant). The Safeguarding Team will support the victim/survivor and/or complainant regardless of whether they wish to report to local authorities. Trickle Up aims to be a survivor-led organization, and the

⁹ Presentation can be found here:

https://trickleupprogram.sharepoint.com/:p:/r/_layouts/15/Doc.aspx?sourcedoc=%7BF7BCFAA7-7531-419A-B4B5-5E3C48F53EED%7D&file=InterAction_Cigna%20Duty%20of%20Care%20Workshop%20Powerpoint%20July%2011%202019.pptx&action=edit&mobileredirect=true, or by contacting InterAction and requesting a copy of such presentation, which was given at the Cigna/InterAction Duty of Care Workshop in Washington DC on, July 11, 2019.

principle of being survivor-led must always be balanced against the risk and protection of vulnerable groups. If the victim/survivor is a Child or a Vulnerable Adult, then decisions about their welfare may have to be made by others. However, as far as is possible and appropriate, victims/survivors will be engaged in the conversation about their own welfare.

Confidentiality must be maintained throughout the complaint process by all staff and witnesses. Staff members who breach confidentiality will be subject to disciplinary action up to and including termination of employment. In some cases, such breaches constitute breaking the law.

Any investigation that is undertaken must be completed, regardless of whether the alleged perpetrator is still a Representative. Formal internal Trickle Up responses shall not be considered closed simply by way of a Representative being discharged from duty.

Retaliation Against Complainants, Victims and Witnesses

No person covered by this policy shall be subject to adverse action because such person reports misconduct, provides information, or otherwise assists in any investigation pursuant to this policy.

Trickle Up will take action against any staff, volunteers, or other representatives, whether they are the subject of a complaint or not, who seek or carry out retaliatory action against complainants, victims, or other witnesses. Staff who are found to do this will be subject to disciplinary action, up to and including termination of employment.

a. Outcomes of Misconduct

Representatives of Trickle Up who are found to contravene this policy will be subject to disciplinary action that may result in termination of employment.

b. False Allegations

If a Representative of Trickle Up is found to have made an allegation that they knew to be false, they will be subject to disciplinary action, up to and including termination of employment.

c. Complaints about Trickle Up's Partners

If Trickle Up receives a complaint about a Partner, Trickle Up expects the Partner to respond quickly and appropriately. Trickle Up should assist the Partner in ascertaining its obligations under local law, and should encourage the Partner to adopt a survivor-centric approach and conduct an independent investigation.

If there is reason to believe that an allegation of Sexual Exploitation or Sexual Abuse has been dealt with inappropriately by a Partner, then that Partner risks withdrawal of Trickle Up funding or the end of the relationship with Trickle Up and its including networks and consortia.

H. DEFINITIONS

Child – means anyone under 18 years old (or older if the local law indicates as such).

Child Abuse – means (i) Child Neglect; or (ii) physical abuse, Sexual Abuse, Sexual Exploitation, or emotional abuse of a Child.

Child Neglect – means the failure to provide a Child with the essential conditions for their physical and emotional development and well-being.

Domestic Abuse – means “any incident or pattern of incidents of controlling, coercive or threatening behavior, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.”¹⁰ This may include psychological, physical, sexual, financial, and emotional abuse, so called ‘honor’ based violence, forced marriage, and Female Genital Mutilation.

Female Genital Mutilation – means “procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons.”¹¹

Independent Third Party Investigatory Board – means a three-person board comprised entirely of individuals with specialized knowledge and management skills in the area of Sexual Exploitation and Sexual Abuse. The President of Trickle Up shall assemble such board. No member of such board may be directly affiliated with Trickle Up, meaning no member may be a Trickle Up Representative.

Partners – means a person employed by an organization other than Trickle Up, but who is working in conjunction with Trickle Up to advance Trickle Up’s goals. Partners may be employees of other non-governmental organizations, governmental organizations, independent contractors, or consultants. For purposes of this policy, Program Participants’ coaches are included in the definition of Partners. Board Members are not Partners.

PSEA Procedures – means the Forms attached to this PSEA policy document.

Program Participant – means an individual who takes part in a program supported by Trickle Up and its partners. The term “Participant” is equivalent to the word “beneficiary,” which is often used by nonprofits.

¹⁰ Home Office Guidance: Domestic Violence and Abuse.

¹¹ World Health Organization factsheet on Female Genital Mutilation

Representative – means employee, board member, paid or unpaid intern, volunteer, contractor, or consultant. Representatives do not include Partners.

Safeguarding – means measures to protect the wellbeing and human rights of individuals to live free from Sexual Abuse and Sexual Exploitation.

Safeguarding Board Representative – means the Board member so designated by the chair of the Board.

Safeguarding Team – means the Vice President, Programs, the Vice President, Planning and Operations, and the Safeguarding Board Representative. The Safeguarding Team shall always include at least one male and at least one female member.

Senior Management Team – Means the President, the Vice President, Programs, the Vice President, Planning and Operations, the Vice President, Program Quality and Innovation, and the Vice President, Development.

Sexual Abuse¹² – means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes the invasion of any part of the victim’s body with a sexual organ, or of the anal or genital opening of the victim with any object or any other part of the body. Sexual abuse represents a wide spectrum of behaviors and is not limited to the act of sexual intercourse.

Sexual Exploitation¹³ – 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 conduct with or Sexual Abuse of another. Sexual exploitation represents a wide spectrum of behaviors and is not limited to the act of sexual intercourse.

Sexual Harassment – means unwanted or unwelcome conduct of a sexual nature. It can be directed towards one person, groups of people, or towards everyone and can occur as a one-off incident or be a pattern of harmful behavior. Anyone can experience sexual harassment, and Trickle Up recognizes the specific and varied challenges faced by women, men, transgender people, and others when experiencing it. The effect of sexual harassment is to violate the dignity of another person and to create an intimidating, hostile, degrading, humiliating, or offensive environment for them and others. Sexual harassment can take many forms, including (but not limited to): Verbal comments of a sexual nature, such as remarks about an employee's appearance or attire, questions about their sex life, innuendos, or offensive jokes; non-verbal activity such as displaying pornographic or explicit images, sexual gestures, or written comments of a sexual nature such as offensive or inappropriate; physical

¹² United Nations Secretary General’s Bulletin: Special Measures for Protection from Sexual Exploitation and Sexual Abuse (2003).

¹³ Id.

conduct such as unwanted physical contact, touching, and assault (this includes attempts and threats to do these things). When addressing allegations of sexual harassment, Trickle Up is concerned with the impact of the behaviors on the complainant, not the intention of the person accused. An action or behavior can still be considered sexual harassment even if the alleged harasser did not intend for it to be harmful. All workers are protected from sexual harassment in the workplace. This protection comes from both employment law and criminal law.¹⁴

Transactional Sex – means buying or selling sex, sexual favors, or humiliating, degrading, or exploitative behavior in exchange for money, protection, gifts, or other goods and services. For clarity during the translation of this policy, transactional sex includes prostitution.

Vulnerable Adult – 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.”¹⁵

Vulnerable Adult Abuse – means physical, sexual, psychological, financial/ material, discriminatory, Domestic Abuse, or self-neglect of a Vulnerable Adult.

¹⁴ Note that in the United States, under both federal and state law, Sexual Harassment in the workplace is a form of unlawful sex discrimination, and complaints of such Sexual Harassment should be made pursuant to the procedures in the Trickle Up Employee handbook.

¹⁵ Department of Health and Social Care. No Secrets: Guidance on Protecting Vulnerable Adults in Care

Annex 1: Trickle Up Sexual Exploitation and Abuse Prevention and Response Checklist¹⁶

Objective 1: Clear Policies, Procedures, and Systems

	Action	Estimated Completion Date	Person/team responsible	Comments
1	Develop a revised PSEA Policy and complaints/reporting mechanism and complete internal, outside counsel, and peer review	July 2019	Caroline Werner, SMT	
2	Ensure PSEA Policy and complaints/reporting mechanism are available on SharePoint and on website (website availability is “if appropriate” per CEO pledge)			
3	Designate Safeguarding Board Representative			
4	President to name members of Independent Third Party Investigatory Board			

Objective 2: Mainstream PSEA

	Action	Estimated Completion Date	Person/team responsible	Comments
1	Train staff on PSEA policy, including roles and responsibilities			In-person training preferred, one online option available here: https://www.interaction.org/training/ https://www.interaction.org/blog/course-materials-for-preventing-sexual-exploitation-and-abuse/

¹⁶ Adapted from InterAction

				<p>InterAction is developing 2 hour Safeguarding and Child Protection course in French and Spanish aimed at field offices and partners (available September 2019)</p> <p>*India team completed PSEA training in August 2019</p>
2	<p>Train Safeguarding Team in handling Sexual Abuse and Sexual Exploitation complaints and prevention, carrying out investigations, and delivering support to survivors of and victims</p>			<p>In-person training preferred, one online option available here: https://www.interaction.org/training/</p> <p>https://www.interaction.org/blog/course-materials-for-preventing-sexual-exploitation-and-abuse/</p> <p>https://files.humentum.org/dl/k8yQTn2aXS/</p>
3	<p>Train Independent Third Party Investigatory Board on PSEA</p>			<p>In-person training preferred, one online option available here:</p> <ol style="list-style-type: none"> 1. https://www.interaction.org/training/ 2. https://www.interaction.org/blog/course-materials-for-preventing-sexual-exploitation-and-abuse/ 3. https://files.humentum.org/dl/k8yQTn2aXS/
4	<p>Integrate into HR termination process a system for letting terminated employees know that we will disclose Sexual Abuse and Sexual Exploitation violations to other potential</p>			

	employers if such employers ask			
5	Integrate into HR onboarding PSEA policy and briefing, and advice about where to seek further information about Safeguarding and safer practices across the organization. New staff must also take and pass a PSEA quiz demonstrating their knowledge of Trickle Up's PSEA policy and sign form indicating they have received policy.			
6	Integrate into HR hiring process a system for letting potential employees know about our background checks			
7	Integrate violation consequences into human resources policies and procedures			

Objective 3: Knowledge

	Action	Estimated Completion Date	Person/team responsible	Comments
1	All Representatives formally acknowledge receipt of the PSEA			
2	Senior management develop a key message strategy and provide ongoing information on the issue			
3	Disseminate requisite information to Partners (InterAction suggests this be a list of guidelines and goals; Partners themselves to come up with ways to address)			
4	Create a dialogue and promote awareness about PSEA issues and complaint mechanisms with community stakeholders so as to inform participants (InterAction suggests this be a list of guidelines and goals, local stakeholders themselves to come up with ways to address)			
5	Develop and implement strategy to inform participants re: PSEA issues and complaints mechanisms (InterAction suggests that when groups are formed, basic information about our values of compassion and respect are imparted, therefore we have certain expectations about PSEA, and you can contact us in X way to address any issues)			Possibly to happen via app; possibly to happen via potential InterAction funding

Objective 5: Monitoring and Evaluation System

	Action	Estimated Completion Date	Person/team responsible	Comments
1	Develop monitoring plan/review on PSEA policies and activities; possibly to include monthly women's groups at the field level- spokesperson takes any complaints to Safeguarding Team			

2	Assign senior management staff to lead or conduct the review			
3	Follow up on findings of review and implement necessary changes			
4	Participate in wider accountability initiatives and share PSEA monitoring and evaluation results			
5	Complete annual review of this policy			

Annex 2: Further Guidance for embedding PSEA across Trickle Up

Awareness Raising for Partners

Trickle Up staff providing sub-grants to partners will systematically share this PSEA Policy, and will request that all sub-grantees report on their measures to prevent sexual exploitation and abuse of beneficiaries and persons of concern in their donor reporting.

Awareness Raising for Program Participants

Trickle Up's PSEA policy should be promoted as we work with Program Participants in the following ways: Feedback from communities on Trickle Up's role (or, if more pertinent, Partners' roles), Representative behaviors, and complaints should be actively sought. Trickle Up Representatives (or, if more reasonable, Partners' Representatives) should present feedback to communities on what changes have been made resulting from complaints. If any Trickle Up Representatives work directly with Program Participants, they must receive training on how to receive complaints and disclosures.

Form 1: Staff and Volunteer Written Receipt of PSEA

Staff Verification of Receipt and Understanding of Safety and Security Policy

Updated 4-16-19. Adapted from Mercy Corps with permission.

Instructions: All current staff should be given this form, and new staff should be given this form during onboarding. Volunteers should be given this form before commencement of volunteer activities. The manager will give the form to the finance/administration officer who must keep these forms on file throughout the period of the staff's employment (or the volunteer's volunteer activities, as applicable), as well as send a copy of the form to the Vice President, Planning and Operations at TU headquarters. The Vice President, Planning and Operations will retain forms throughout the staff's employment at TU (or the volunteer's volunteer activities, as applicable).

I, _____ (name), have received, read, and understood the Trickle Up PSEA Policy. Any questions I have about the policy have been answered. I understand that as a staff member or volunteer, as applicable, I am obliged to follow this policy to the best of my ability. I understand that failure to do so could lead to abuse-related incidents that could jeopardize my safety or that of other members of the TU team, and therefore, could be grounds for disciplinary action up to and including termination.

Name, position, and signature of staff member or volunteer

Date

Name and signature of witness

Date

Form 2: Sexual Abuse/Sexual Exploitation Complaint Form

Trickle Up Sexual Abuse/Sexual Exploitation Complaint Form

(revised 5-8-19)

EMAIL TO HEADQUARTERS at mcastlen@trickleup.org and bjackson@trickleup.org

Name and nationality of complainant:

Name(s) and address of parent(s), if complainant is under age 18:

Address and contact details (email and/or phone):

Age and sex of complainant:

Name and nationality of victim (if different than complainant):

Address and contact details (email and/or phone):

Age and sex of victim:

Name(s) and address of parent(s), if victim is under age 18:

Has the victim given consent to the completion of this form? Yes _____ No _____

Date, time and place of incident:

Brief description of incident:

Physical and emotional state of the victim (describe any cuts, bruises, lacerations, behaviour, and mood):

Witness names and contact information:

Name(s) and address of parent(s), if witness is under age 18:

Names nationalities of accused persons:

Name(s) and address of parent(s), if accused person is under age 18:

Address and contact details (email and/or phone):

Job title(s) of accused persons:

Age, sex, and description:

Have the police been contacted Yes _____ No _____

If yes, what happened?

If no, does the victim want police assistance, and if not, why?

Has the victim been informed about available medical treatment?

Has the victim sought medical treatment for the incident?

If yes, who provided treatment? What is the diagnosis and prognosis?

What immediate security measures have been undertaken for the victim?
Who is responsible for ensuring the security measures for the victim going forward (name, title, organization)?
Details on legal, medical, and psychological needs of the victim going forward:
Decisions and actions requested from headquarters:
Signature of person reporting, signaling consent for form to be shared with management, police, and health services, as necessary:
ALL INFORMATION MUST BE HELD SECURELY AND HANDLED STRICTLY IN LINE WITH APPLICABLE REPORTING AND INVESTIGATION PROCEDURES