

PSEA POLICY

JCO, South Sudan

JAMNEL CARE ORGANIZATION TONGPING ALONG CATHOLIC UNIVERSITY WAY

**Protection from Sexual Exploitation and Abuse
(PSEA) Policy**

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Confidentiality: The policy statement will be made public, including placing on JCO's official website at

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01. Introduction and Preamble

JAMNEL CARE ORGANIZATION (JCO South Sudan) places human dignity at the centre of its relief and development work. Vulnerable adults and children are particularly at risk of sexual exploitation and abuse.

This policy defines JCO's commitment to the protection from sexual exploitation and abuse (PSEA) of vulnerable adults, involving JCO's Employees and Related Personnel.

In recognition of the special vulnerability of children, this policy also affirms JCO's commitment to the welfare and protection from sexual exploitation and all forms of abuse of children, involving JCO's Employees and Related Personnel.

JCO has a zero tolerance toward sexual exploitation and abuse and child abuse.

JCO takes seriously all concerns and complaints about sexual exploitation and abuse and child abuse involving JCO Employees and Related Personnel. JCO is committed to initiate rigorous investigation of complaints that indicate a possible violation of this policy and takes appropriate disciplinary action, as warranted.

The JCO PSEA Policy has been developed in accordance with the six core principles adopted in 2002 by the Inter-Agency Standing Committee Task Force on Prevention and Response to Sexual Exploitation and Abuse (2002), and the principles of the United Nations Secretary General's Bulletin on Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13).

The JCO PSEA Policy is informed by respective South Sudanese legal acts that prohibit sexual and gender based violence, International Human Rights Law, United Nation's standards, and best practice guidelines from the humanitarian sector.

The JCO PSEA Policy is also in line with the following:

- IASC Minimum Operating Standards for Protection from Sexual Exploitation and Abuse by own Personnel (2012);
- The Global Review of Protection from sexual exploitation and abuse by UN, NGO, IOM and IFRC Personnel, July 2010;
- The Statement of Commitment on Eliminating Sexual Exploitation and Abuse by UN and non-UN Personnel, August 2008, and
- The Core Humanitarian Standards (CHS) on Quality and Accountability.

02. Policy Statement

JAMNEL CARE ORGANIZATION (JCO) – will not tolerate sexually abusive or exploitative acts being perpetrated by our employees, volunteers or anyone associated with the delivery of our programmes. Employees and managers are bound to uphold this policy and to report people or incidents that they believe contravene it. The JCO's senior and middle leveled managers have a duty to ensure that allegations of sexual exploitation and abuse are investigated and that appropriate disciplinary measures are taken. The JCO also has a duty to provide appropriate assistance to any victims of sexual exploitation and abuse by our staff.

03. Core Principles

In order to protect the most vulnerable populations, particularly vulnerable adults and children, and to ensure the integrity JCO's activities, the following six Core Principles must be adhered to:

03.1 Sexual exploitation and abuse and child abuse by JCO's Employees and Related Personnel constitute acts of gross misconduct and are therefore grounds for termination of employment.

03.2 Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of the majority or age of consent locally. Mistaken belief in the age of the child is not a defense.

03.3 Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior by JCO Employees and Related Personnel is prohibited. This includes the exchange of assistance that is due to programme participants.

03.4 Sexual relationships between JCO Employees/Related Personnel and programme participants are strongly discouraged since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of JCO's relief and development work.

03.5 Where a JCO's Employee or Related Personnel develops concerns or suspicions regarding sexual abuse or exploitation and child abuse by a fellow worker, whether in JCO or not, he or she must immediately report such concerns via the established agency reporting mechanisms.

03.6 JCO's Employees and Related Personnel are obliged to create and maintain an environment that prevents sexual exploitation and abuse and child abuse and promotes the implementation of this Policy. JCO's Managers at all levels have particular responsibilities to support and develop systems, which maintain this environment.

04. Definitions and forms of sexual exploitation and abuse

JCO defines the term sexual exploitation as 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 exploitation of someone else. The term sexual abuse means actual or threatened physical intrusion of a sexual nature, whether by force, coercion or under unequal conditions.

JCO has a zero-tolerance stand on exploitative and abusive relationships. We will also not tolerate behaviour that endangers the security of employees or the organisation or brings either into disrepute. It follows, therefore, that employees should have:

- No sexual contact with children under the age of 18 (mistaken belief of age being no defence).
- No transactional sexual contact with JCO's beneficiaries.

JCO recognizes that sexual exploitation and abuse of vulnerable people is a global phenomenon. It is clear that working with vulnerable individuals can entail dealing with issues of sexual exploitation and abuse. It is vital that sexual exploitation and abuse are not perpetrated or compounded by those who JCO puts in contact with vulnerable people. It is therefore crucial that we all understand the problem of sexual exploitation and abuse and our own role and responsibility in preventing it. Employees need to consider how their sexual conduct might bring JCO into disrepute.

3.1 Children and vulnerable adults:

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

3.2. 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.

3.3. Sexual Exploitation:

Sexual exploitation means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

3.4 Sexual Abuse

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

3.5 Child Exploitation and Abuse (involves one or more of the following):

a. Physical abuse:

Physical abuse occurs when a person purposefully injures or threatens to injure a child or young person. 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.

b. 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.

c. Neglect:

Neglect is the failure to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being.

d. 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.

e. Grooming:

Grooming generally refers to behavior that makes it easier for an offender to procure a child for sexual activity. It often involves the act of building the trust of children and/or their carers to gain access to children in order to sexually abuse them.

For example, grooming includes encouraging romantic feelings or exposing the child to sexual concepts through pornography.

f. Online grooming:

Online grooming is the act of sending an electronic message with indecent content to a recipient who the sender believes to be less than 18 years of age, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender.

Harassment is defined as an unwelcome behavior of offensive nature severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

This includes discrimination based on gender, race, religion, sex (including pregnancy), ethnicity, age, disability or genetic information. It includes bullying, stalking, sexual harassment, personal harassment, and harassment based on any characteristics listed above.

g) PSEA means Protection from Sexual Exploitation and Abuse.

h) Sensitive cases are cases where individuals or groups are harmed, discriminated against, exploited or neglected by individuals.

This includes, but is not limited to:

o Non-compliance with the JCO PSEA Policy and other complimentary policies (Code of Conduct, Safeguarding).

o Any harm caused by an individual or organization contracted by JCO (employee, volunteer, trainee, consultant, partner, sub-grantee etc.). Harm done can be physical, sexual, emotional, and/ or discriminatory and can lead to situations of exploitation and abuse of power

3.6 Sexual Abuse means the actual or threatened physical intrusion of a sexual nature, including inappropriate touching or harassment, which can occur a. by force; b. under unequal conditions; or c. under coercive conditions.

3.7 Sexual exploitation are practices by which a person achieves sexual gratification, financial gain or advancement through the abuse or exploitation of a person's sexuality by abrogating that person's human right to dignity, equality, autonomy, physical and mental well-being; i.e. trafficking, prostitution, prostitution tourism, bride trade, pornography, stripping, battering, incest, rape and sexual harassment.

3.8. Suspicion is when a concern is expressed about abuse that may have taken place or concern that abuse may take place.

3.9. Exploitation shall include, at a minimum, the exploitation or the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs.

4.0. Trafficking in Persons is the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

05. The JCO's employee and related personnel standards

- JCO Employees and Related Personnel will not request any service or sexual favor from participants of JCO programs, children or others in the communities in which JCO works, in return for protection or assistance, and will not engage in sexually exploitative or abusive relationships.
- JCO Employees and Related Personnel will not exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This prohibition against exchange of money for sex means JCO Employees and Related Personnel may not engage the services of sex workers.
- JCO Employees and Related Personnel are strongly discouraged from having sex or engaging in sexual activities with program participants because there is an inherent conflict of interest and potential for abuse of power in such a relationship. If an employee engages in sex or sexual activities with a program participant, the employee must disclose this conduct to his /her supervisor for appropriate guidance. Failure to report such conduct may lead to disciplinary action pursuant to JCO's policies and procedures.
- JCO Employees and Related Personnel must refrain from sexual activity with any person under the age of 18, regardless of the local age of consent, i.e. the local or national laws of the country in which the employee

works. Ignorance or mistaken belief of the child's age is not a defense. Failure to report such a relationship may lead to disciplinary action pursuant to JCO's policies and procedures.

- JCO Employees and Related Personnel will not support or take part in any form of sexual exploitative or abusive activities, including, for example, child pornography or trafficking of human beings.
- JCO Employees and Related Personnel will treat all children with respect and not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- JCO Employees and Related Personnel will not hire children for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities or which places them at significant risk of injury.
- JCO's Employees and Related Personnel will protect, manage and utilize JCO's human, financial and material resources appropriately and will never use JCO resources, including the use of computers, cameras, mobile phones or social media, to exploit or harass participants of JCO programs, children or others in the communities in which JCO works.
- When photographing or filming a child for work-related purposes, JCO Employees and Related Personnel will:
 - comply with local traditions or restrictions for reproducing personal images,
 - obtain informed consent from the parent or guardian of the child, before photographing or filming a child, explaining how the photograph or film will be used,
 - ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner,
 - ensure children are adequately clothed and not in poses that could be seen as sexually suggestive,
 - ensure images are honest representations of the context and the facts, and
 - ensure file labels do not reveal identifying information about a child.
- JCO's Employees and Related Personnel must immediately report any concerns or suspicions they have regarding possible violations of this Policy by JCO's Employee or Related Personnel via JCO's reporting mechanism. Employees and Related Personnel must report any such concerns even when the person who may be in violation of this Policy is Related Personnel, as previously defined, and not JCO's Employee.
- JCO's Employees and Related Personnel will prevent, oppose and combat all exploitation and abuse of children.
- Wherever possible, JCO's Employees and Related Personnel should work with another adult present when working with children.
- JCO's Employees and Related Personnel must immediately disclose charges, convictions and other outcomes of an offence that relates to child exploitation and abuse including those under traditional law.
- Sensitive information related to incidents of sexual exploitation and abuse or child abuse whether involving colleagues, program participants or others in the communities in which JCO works shall be shared only with formal enforcement authorities and JCO employees of the appropriate seniority or function who have a need to know such information. Breach of this policy may put others at risk and will therefore result in disciplinary procedures.
- JCO Employees and Related Personnel must undertake to create and maintain an environment that promotes implementation of this policy.

- JCO's Director, HR, managers and supervisors at all levels have particular responsibilities to support and develop systems that maintain an environment that facilitates implementation of this policy and which is free of sexual exploitation and abuse and child abuse.

06. Who the policy applies to

This policy applies to all employees, volunteers, consultants, representatives and those connected to JCO including, for example, partners, incentive workers, journalists, researchers, catering staff, other service providers to JCO.

They should ensure their conduct:

- Is never influenced by personal gain or advantage that results in a risk or detriment to CEN.
- Could not give rise to suspicion of improper motives.
- Is in keeping with JCO's policies and procedures
- Respects and never violates the rights of vulnerable people.

All those associated with JCO must act in a professional and ethical manner in accordance with the *Code of Conduct* and other organizational JCO's policies and rules.

07. Our Commitments at JCO:

It is the responsibility of our managers, employees and anyone who works with us to report incidences of incorrect behaviour being perpetrated by anyone within JCO or working for other agencies. Managers, in particular, are responsible for creating and maintaining an environment in which employees, volunteers and contractors know what JCO expects from them and feel able to report any suspicious or inappropriate behaviour.

Specifically, JCO is dedicated to fulfilling the six Core Principles through implementation of the following Commitments. This includes time-bound, measurable indicators of progress to enable JCO to monitor its performance.

07.1. Develop organization-specific strategies to prevent and respond to sexual exploitation and abuse and child abuse, including incorporating appropriate job responsibilities (such as staff training, complaints and response mechanisms, and coordinating high-level oversight and progress reports by directors) in specific staff positions to support and ensure effective implementation of organization strategies to prevent and respond to sexual exploitation and abuse.

07.2 Undertake risk assessments to identify areas of risks and document steps that are being taken to remove or reduce these risks.

07.3 Incorporate JCO's standards on sexual exploitation and abuse and child protection in relevant codes of conduct and in induction materials and training courses for JCO's Employees and Related Personnel, including specific provisions for child sexual exploitation and abuse.

07.4 Ensure that when engaging in partnerships, sub-grant or sub-recipient agreements, these agreements a) incorporate this Policy as an attachment; b) include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to abide with a Code of Conduct that is pursuant to the standards of this Policy; and c) expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against sexual exploitation and abuse and child abuse, to investigate and report allegations thereof, or to take corrective actions when sexual exploitation or abuse or child abuse has occurred, shall constitute grounds for JCO to terminate such agreements.

07.5 Regularly inform JCO Employees and Related Personnel and communities on measures taken to prevent and respond to sexual exploitation and abuse and child abuse. Such information should be developed and disseminated in-country in cooperation with other relevant agencies and should include details on complaint mechanisms, the

status and outcome of investigations in general terms, feedback on actions taken against perpetrators, and follow-up measures taken as well as assistance available to complainants and survivors. Any information that is not of a general nature and concerns specific cases must respect confidentiality for all parties involved, including the survivor and family, employee or related personnel, and the ongoing investigation process, particularly where there are legal implications.

07.6 The established complaints mechanism may at times be an internal JCO mechanism however JCO is also committed to participating in inter-agency community based complaints mechanisms in humanitarian contexts and therefore inter-agency complaints mechanisms may be the established system in some contexts.

07.7 Engage the support of communities and other partners to prevent and respond to sexual exploitation and abuse and child abuse by JCO Employees and Related Personnel.

07.8 Ensure that complaint mechanisms for reporting sexual exploitation and abuse and child abuse are accessible and that JCO focal points for receiving complaints understand how to discharge their duties. This should include a documented reporting procedure in a relevant local language for sexual exploitation and abuse and child abuse allegations and policy for non-compliance in, including available sanctions for breaches.

07.9 Provide support and assistance to complainants of sexual exploitation and abuse or child abuse. This may include medical treatment, legal assistance and psychosocial support as appropriate and according to the wants and needs of the survivor whilst also taking account of confidentiality, cultural sensitivities and survivor safety.

08.0 In compliance with applicable laws, prevent perpetrators of sexual exploitation and abuse and child abuse from being (re)hired or (re)deployed. Managers and Human Resource teams must ensure robust recruitment screening processes for all personnel, particularly for personnel who will have any direct or indirect contact with children. This could include use of background and criminal reference/ record checks, verbal referee checks, and interview plans that incorporate behavioral-based interview questions.

08.1 Investigate allegations of sexual exploitation and abuse and child abuse in a timely and professional manner. This includes the use of appropriate interviewing practices with complainants and witnesses, particularly with children. Engage professional investigators or secure investigative expertise as appropriate.

08.2 Take swift and appropriate action, including legal action when required, against JCO Employees and Related Personnel who commit sexual exploitation and abuse and child abuse. This may include administrative or disciplinary action, and/or referral to the relevant authorities for appropriate action, including criminal prosecution, in the abuser's country of origin as well as the host country.

08.3 Take appropriate actions to the best of JCO's abilities to protect persons from retaliation where allegations of sexual exploitation and abuse or child abuse are reported involving JCO Employees or Related Personnel.

08.4 Ensure high-level oversight and information systems on sexual exploitation and abuse and child abuse reports received and actions taken, in order to monitor effectiveness, report progress and improve efforts to prevent and respond to sexual exploitation and abuse and child abuse.

08. Responsibilities

JCO's Board and Senior Management

- The JCO's Board is ultimately responsible for the application and implementation of the JCO's PSEA Policy through Senior Management Teams in Head Office (Director, HR, Heads of Units) and in country field programmes.
- The JCO Board will ensure that adequate technical support is provided to country programmes to support and implement the JCO PSEA Policy. One member of the board is identified as the PSEA focal point. Senior staff and managers are expected to report on PSEA and breaches of the JCO PSEA Policy to the JCO Board.
- A yearly report, based on an internal audit is also sent by JCO South Sudan country programme to the JCO's Director and HR.
- PSEA policy implementation is regularly monitored by the Audit and Risk Committee.
- JCO employees are obliged to create and maintain an environment which prevents exploitation and abuse and promotes the implementation of the JCO PSEA Policy.

- Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.
- HR, JCO's Management at coordination/head office and field managers and supervisors must ensure that their employees and related personnel understand and comply with the JCO PSEA Policy and its Core Principles (see 'Policy provisions above).
- JCO managers and supervisors commit to:
 - a. Managers agree to disseminate the JCO PSEA Policy within the organization and among partners and representatives.
 - b. The obligation to report is mandatory.
 - c. All reported concerns will be investigated fully.

- d. Sexual Exploitation and Abuse are extremely damaging for the victim(s), the organization and staff (by association or if wrongly suspected)
- e. Adherence to the JCO PSEA Policy by all employees and related personnel is mandatory and a contractual agreement.
- f. **Human Resources:** All staff, related personnel and visitors are informed about the JCO PSEA Policy during their induction.
- g. It is the responsibility of the field office where staff are stationed to ensure that all staff members receive training on the JCO PSEA Policy.
- h. Incorporate appropriate job responsibilities (such as staff training, complaints and response mechanisms, coordinating high-level oversight and progress reports) in specific staff positions to support and ensure effective implementation of organizational strategies to prevent and respond to SEA.
- i. Ensure that in every JCO's office there is a Protection focal point who responds for both Child Protection and Gender issues. The focal point must have resources and time allocated to its responsibilities.
- j. Incorporate the JCO PSEA Policy in induction materials and training courses for employees. Follow up training on complaints and feedback should also be provided.
- k. Ensure recruitment processes use thorough background checks and also vet potential employees' attitudes towards PSEA, in line with applicable laws. c. Procedures.
- l. Include PSEA in risk assessment, monitoring and reporting processes e.g. Risk Register.
- m. Develop organization-specific strategies to prevent and respond to incidents of SEA
- n. Through our on-going work, commit to engagement with stakeholders, in particular individuals, communities and local government with whom we work to address underlying root causes of SEA.
- o. Accountability: Accessible complaints and response mechanisms that have responsibilities for responding to instances of SEA.
- p. The ultimate responsibility for implementing this policy is with the JCO Board of Directors. The Senior Management Team (Director shall hold HR and heads of Units to account for ensuring implementation of the JCO PSEA Policy including risk management processes.
- q. Though the PSEA Policy, JCO commits to addressing inherent power dynamics within humanitarian and development partnerships through promotion of meaningful engagement with stakeholders as active participants in line with the Core Humanitarian Standards.

09. Reporting at JCO:

It is the obligation of all JCO staff and related personnel to raise any concerns or suspicions they have, actual or perceived, of any breach of the JCO PSEA Policy by any colleague or client to the Policy.

This should be done through:

1. JCO's internal and external mechanism as laid out by HR procedures;
2. OR To a senior manager with whom they feel comfortable;
3. OR The Country team focal point for PSEA;
4. OR Director.
5. OR HR.

All JCO country programmes will also have a focal point trained in handling sensitive issues arising from an actual or perceived breach of the JCO PSEA Policy.

When made aware of an alleged breach of the JCO PSEA Policy, JCO will:

- Take appropriate action to the best of its capacity to protect persons from retaliation when allegations of sexual exploitation and abuse are made in good faith.
- Investigate allegations of sexual exploitation and abuse involving JCO staff and related personnel in a timely and professional manner, and to the best of its capacity encourage all designated stakeholders to do the same.
- Inform donors and relevant regulatory authorities as required by contracts and law, respectively.
- Use appropriate interviewing practices with complainants and witnesses, particularly with children. This may include engaging professional investigators or securing investigative expertise as appropriate.
- Take swift and appropriate action, including legal action when required, against employees and related personnel who commit sexual exploitation and/or abuse.
- Take swift and appropriate action against those who were aware of such abuse/exploitation but did not report it.
- Support survivors of SEA, including but not limited to medical assistance, if required.
- All JCO staff should be made aware of the reporting mechanisms for PSEA by ensuring that reporting lines on how to raise concerns are displayed in an accessible location in all JCO offices. This display must contain the contacts of all focal points, the internal and external whistleblowing contacts, the complaints response mechanism, the HR and the JCO Director.

10. Training and Communication:

All staff, related personnel, catering staff, volunteers, consultants, service providers and visitors both in the fields offices and in support/head office are to be informed about the JCO PSEA Policy during their induction. It is the responsibility of the field office where staff are stationed to ensure that all staff members receive training on the JCO PSEA Policy.

Each country's office PSEA Focal Point (as nominated by Director, HR and Heads of Units) will also conduct regular updates and specific trainings to meet the needs of particular staff roles within the local context and its accompanying risks.

JCO will audit its operations annually to ensure that PSEA is being addressed correctly **in 4 components:**

a. Policy: the JCO PSEA policy is applied in all JCO's country programmes and field offices it is easily accessible to all staff and fully understood by all JCO staff and related personnel.

b. Procedures: systems are in place to reduce risks of abuse, rumors and the possibility of harm.

c. People: staff are recruited, managed and work in an environment that addresses PSEA through support, training, information and response.

d. Accountability: systems are in place to receive and respond to concerns, and to recognize and limit risks.

11. Non-compliance:

- Any concern regarding PSEA or suspicion of SEA or a breach of the JCO PSEA Policy, at any level is treated with the utmost seriousness by CEN.
- The disciplinary actions are detailed in JCO's HR Manual and include investigation into gross misconduct and breach of Policies.
- JCO appreciates that cases of sexual abuse or exploitation can be exceptionally difficult to discover and/or prove. Survivors of sexual abuse and exploitation often face enormous social and cultural barriers to reporting any abuse or exploitation. In many cases alleged perpetrators may wield power or position over their victims, and/ or live in close proximity to them. JCO recognizes that these factors may interfere with any investigation into cases of sexual abuse or exploitation. JCO also recognizes the significant damage that can be caused by malicious or unfounded accusations and will endeavor to provide protection for staff who may be wrongly accused.

12. Associated Policies:

- This policy is complementary to the set of standards of behavior that all JCO employees are required to adhere to in the JCO Code of Conduct and Code of Ethics and any further codes or related policies defined by JCO.
- This Policy is also a response to JCO's accountability to the communities it works with
- This Policy is also a response to JCO's compliance to UN SG PSEA Policy, and is therefore to be operationalized as part of the broader JCO's adherence to Accountability Framework.