



Policy about the prevention and protection against harassment, exploitation and sexual abuse

**Asmae - Soeur Emmanuelle
Association**

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GLOSSARY

- **Committee for the prevention, monitoring and HESA case management:** the Committee is the body responsible for overseeing the implementation of PHESA at Asmae. As such, it is responsible for handling HESA cases and investigations brought to its attention as well as receiving and collecting HESA situations of concern. It is also responsible for monitoring prevention and awareness-raising actions, namely through the annual review of the PHESA and its action plans.
- **The Director of International Action** is responsible for leading the international program strategy and supervising field activities, in close collaboration with Country Representatives for whom he is the line manager.
- **The Director of Social Action France** is responsible for leading and supervising all field activities carried out by teams at the Asmae office in Bobigny (Division 93).
- **The Country Representative** is responsible for leading the implementation and monitoring of the PHESA within his or her geographical area.
- **The implementation plan** includes all the actions, both at Head Office and Country Offices level, aiming to ensure the implementation of this policy in its three components: prevention, case management and protection. It includes the resources needed to implement the policy, as well as a map of the structures and professional stakeholders to be contacted in case of concern. These may be specialized structures, psychologists, coaches, etc. The implementation plan encompasses prevention and awareness raising actions at the level of Asmae's Country Offices and partners.
- **The Prevention and awareness-raising Plan** includes all actions, both at the Head Office or Asmae Country Offices, aiming to raise awareness among staff, partners or visitors, and thus preventing HESA situations.
- **The parties directly involved in HESA cases are** victims, whistleblowers and perpetrators. As long as the investigation is ongoing, victim.s and perpetrator.s are considered alleged and will thus benefit from specific support depending on their status and the progress of the investigation. As such, in this document, each party will be always considered alleged.
The protection focal point, at the Head of Office or at Asmae's Country Offices, is responsible for supporting colleagues and partners in the implementation of activities linked to this policy.

PART 1 – THE CONTEXT

1.1. Introduction

Asmae is an independent and secular non-profit organization under French law 1901. It was founded in 1980 by Sister Emmanuelle to protect and provide access to education to the world's most vulnerable children and combat social injustice. Today, the organization is present in 8 countries: Egypt, Lebanon, Philippines, Madagascar, Burkina Faso, India, Ivory Coast and France.

Asmae is committed to supporting local stakeholders, working for the youth and children, in vulnerable contexts, promoting their autonomy through education, protection and socio-economic services.

In line with Sister Emmanuelle's vision of creating *"A just world that guarantees children to live and grow up in dignity with their families and their environment"*, in 2024 Asmae wished to strengthen its institutional framework by adopting a policy about the prevention and protection against harassment, exploitation and sexual abuse (PHESA)¹.

The PHESA is made up of:

- A **policy document** outlining the means and process of reporting, as well as the body responsible for HESA prevention, case management and monitoring within Asmae
- A **Declaration of commitment** to be signed by any person or structure working with Asmae.
- A **self-assessment protocol**, operational tool for annual policy review in France and internationally, in countries where Asmae and its partners operate.
- A **matrix of proportional measures**, the aim of which is to identify proportional support and/or sanction measures according to HESA cases.

This policy thus completes the body of institutional documents for the people targeted by the various projects and programs, in particular children and young people, but also the staff of Asmae and its partners.

This policy has a double purpose. On one hand, it aims to clarify Asmae's position with regard to the phenomena of harassment, exploitation and sexual abuse. On the other hand, it defines the operational mechanisms for preventing and protecting against these phenomena, as well as the resources available to

¹ This policy is a document that may be updated and amended as necessary.

manage any HESA case identified. By taking all necessary measures to prevent and protect against all forms of violence, Asmae reaffirms its commitment to helping create a safe, violence-free environment in which everyone can grow, develop and flourish.

The annual review of this policy through the self-assessment protocol and the action plans will enable it to be monitored at the organizational level.

1.2.Principles

PHESA is based on the principles that lie at the heart of Asmae's mandate and intervention framework. These are non-discrimination, equality, do no harm principle, reciprocity, listening, and respect for and protection of human rights as defined in the Universal Declaration of Human Rights and the international conventions that derive from it. In particular, the guiding principles of and definitions in the policy stem from the following Conventions:

- The International Labor Organization (ILO) Convention N° 190 on violence and harassment² ;
- The International Convention on the Rights of the Child (ICRC)³ ;
- The International Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)⁴ ;
- The Convention on the Rights of Persons with Disabilities (CRPD)⁵ ;
- The Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (known as the Palermo Protocol).⁶

Although not all of these Conventions have been ratified by all countries, they do provide a common frame of reference for Asmae's teams in the 8 countries where the organization operates and draw guidelines for our work and interventions today and in the future. Indeed, this policy is first and foremost an organizational tool designed to provide a framework for actions to prevent and protect against HESA, through an adapted response that is as harmonized as possible between the countries where Asmae operates. However,

² https://webapps.ilo.org/dyn/normlex/fr/?p=NORMLEX.PUB:12100:0:NO::P12100_ILO_CODE:C190

³ <https://www.ohchr.org/fr/instruments-mechanisms/instruments/convention-rights-child>

⁴ <https://www.ohchr.org/fr/instruments-mechanisms/instruments/convention-elimination-all-forms-discrimination-against-women>

⁵ <https://www.ohchr.org/fr/instruments-mechanisms/instruments/convention-rights-persons-disabilities>

⁶ <https://www.unodc.org/documents/treaties/UNTOC/Publications/TOC%20Convention/TOCebook-f.pdf>

compliance with the national law will be sought by Asmae in situations where Asmae supports the victim to file a complaint to local or national authorities.

1.3. Scope

This policy is the result of an extensive participatory consultation process at all levels of the organization, from interviews to focus groups and desk review. The obligations arising from this policy apply at all levels of the organization, from the Head office to Asmae's country offices, its partners and any entity, physical or legal, working with the groups targeted by Asmae's projects. The scope of this policy covers any posture, behavior or action that may harm the physical, moral or emotional integrity of a member of Asmae's staff, a volunteer or any person who is a partner or target of the services or projects supported or implemented by Asmae. For the sake of brevity, Asmae has chosen to clearly define in this policy only the notions of harassment, exploitation and sexual abuse, while considering situations such as concealment of facts, insults, injures, and violence of any kind. In addition, special attention is paid to children and young people, given their age-related vulnerability. Attention will also be paid to groups whose vulnerability intersects with other situations such as sex, gender, disability or socio-economic status.

Specifically, the contents of this policy apply to the following legal entities or individuals, who must have read at least the summary of this document, if not the full version, and signed its declaration of commitment:

- Asmae staff, whatever their contractual status or hierarchical level is. This includes interns, apprentices, interns, international volunteers and employees;
- Volunteers - including Board members, visitors in France or abroad to an Asmae's field projects, especially if the visit involves direct contact with project staff and targets;
- Service providers, researchers or suppliers of regularly scheduled services involving direct contact with project staff and targets;
- NGO partners' staff, whether employees or volunteers.

This policy applies to the following places and situations, in connection with or on the occasion of work:

- In the workplace, including public or private spaces used as workplaces;
- Break areas, ;
- During travel, training, events or any work-related social activity;
- In the context of work-related communications, including those using information and communication technologies (ICT);

- In accommodation provided by the employer or the partner and during travels;
- During journeys to and from work, whether by public or private, land, air or sea transport.

1.4. Responsibility

The HESA Prevention, Case Management and Monitoring Committee, together with country representatives and the Director of Asmae's Social Action in France, are responsible for overseeing the implementation of this policy, in close collaboration with Asmae's protection focal points, both in the Head Office and in countries where Asmae operates.

All people who have read this policy and signed its declaration of commitment agree to respect it and are responsible for its application.

Anyone who suspects or has witnessed a situation of HESA is required to alert and report the situation using the procedure and means indicated in section [2.2.1 on the reporting procedure](#). Failure to do so may result in sanctions for concealment of facts.

1.5. Definitions

While employers are legally responsible for preventing and protecting their employees from violence and harassment in the workplace, they are also responsible for ensuring that their actions do not undermine the dignity and integrity of people directly or indirectly targeted by projects, whether this involves harassment, exploitation or abuse online or offline. For the purpose of this policy, the procedure to be followed in case of concern will be the same, regardless of the legal entity or individual concerned, among those to whom the content of this policy applies.

It should also be remembered that the definitions of sex, gender and children set out in the other policies developed by Asmae apply to the content of the present policy.

Although anyone under the age of 18 is considered a child, the age of sexual consent varies from State to State. For the purpose of this policy, it is recalled that the consent of any individual under the age of 18 is not considered explicit or free in case of any sexual relationship, and that any sexual relationship between a minor and an adult is considered sexual abuse or assault. In the case of sexual relationships between two

minors, the nature of the facts and the consent of one or both parties will determine whether sexual abuse/assault has occurred.

Harassment

Harassment is a set of repeated practices or behaviors, online or offline, that are likely to cause, are causing or have caused physical, psychological, emotional or economic damage. Generally speaking, harassment has three characteristics: power, frequency and nature of aggression. The notion of harassment also extends to information and communication technologies (ICT).

Similarly, this policy promotes an inclusive, integrated and gender-sensitive approach that aims to prevent and eliminate violence and harassment in the workplace, including gender-based violence and harassment⁷.

The following circumstances will be considered as aggravating circumstances:

- When he or she abuses the authority conferred by his or her position or role;
- When the victim is a minor under 18;
- When the victim is particularly vulnerable due to the following factors: age, illness, physical, sensory or psychosocial disabilities or pregnancy, especially when these are apparent and/or known to the perpetrator;
- On a person whose vulnerability due to economic or social insecurity is apparent or known to the perpetrator.
- When the acts are committed by several people acting as perpetrators or accomplices.

Moral harassment

Under this policy, moral harassment is defined as any unwanted and repeated verbal expression, behavior or action that has the purpose or effect of degrading a person's working and living conditions, undermining his or her self-fulfillment, rights and dignity, or altering his or her physical or mental health or compromising his or her professional career.

Repeated acts and the absence of intent may constitute moral harassment. It is sufficient that the behavior, verbal expression or action has the effect of harming an individual, even in the absence of intention⁸.

⁷ <https://www.ilo.org/fr/resource/ilc/108/convention-ndeg-190-sur-la-violence-et-le-harcelement-2019>

⁸ <https://www.ilo.org/fr/resource/ilc/108/convention-ndeg-190-sur-la-violence-et-le-harcelement-2019>

Sexual harassment

For the purpose of this policy, sexual harassment is defined as any repeated and unwanted sexual or sexist comment or behavior that violates a person's dignity, by being humiliating or degrading, or that creates a hostile, intimidating or threatening environment.

It should be noted that all forms of pressure, even if not repeated, exercised with the real or apparent aim of obtaining an act of a sexual nature, whether for the benefit of the perpetrator or a third party, are considered a form of sexual harassment.

Exploitation

Exploitation occurs when a person is constrained by force or threat to engage in any activity in exchange of something in return, or for the promise of something in return, whether pecuniary or not. Examples of exploitation include begging, forced labor and sexual exploitation.

While the definition of exploitation, particularly sexual exploitation, is not explicitly set out in binding international texts - and differs from one country to another - the definition of human trafficking contained in the Palermo Protocol is the one that best describes the phenomenon of exploitation, including for the purpose of sexual exploitation, in these terms: "trafficking in persons means the recruitment, transportation and 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. Exploitation includes, at a minimum, the exploitation of 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"⁹.

The following three elements - the act, the means and the purpose of exploitation - enable to qualify a situation of exploitation as human trafficking.

Finally, it should be noted that in the case of child trafficking, the means are irrelevant, and only the action and purpose of the exploitation count.

⁹https://www.ohchr.org/sites/default/files/Documents/ProfessionalInterest/ProtocolTraffickingInPersons_fr.pdf

Sexual exploitation

A person is a victim of sexual exploitation when he or she is forced to engage in a sexual activity or relationship in exchange for something in return, or the promise of something in return. These may be pecuniary or non-pecuniary (a service, a good mark at school¹⁰). Taking advantage of, or attempting to take advantage of, a position of vulnerability, unequal power or trust for sexual purposes, including but not limited to financial, social or political gain, is also be considered sexual exploitation¹¹ under this policy.

Sexual exploitation could occur in the context of activities or major events organized by the Organization, field visits or missions by Asmae staff, financial partners and service providers, as well as in the online environment.

It should also be remembered that the relationship of control between the perpetrator and the victim prevents the latter from denouncing the perpetrator or recognizing that he or she is a victim of exploitation. It is therefore essential to be attentive to symptoms and indicators that could reveal a situation of abuse or exploitation. Examples of behaviors that could be observed among project targets include :

- A sudden and strong dependence on drugs or alcohol;
- New or designer clothes;
- Watches or any item that could be linked to a sudden change in economic situation;
- A person, including a minor, transported by a third party (cab, luxury car, etc.).

It should also be pointed out that, with the massive use of information and communication technologies, victims, especially children, are not spared from abuse or sexual exploitation, which can take many forms (*grooming*,¹² *live streaming*,¹³ the use of child pornography, or the exploitation of children, to name but a few).

¹⁰ <https://ecpat.org/wp-content/uploads/2021/05/Terminology-guidelines-396922-EN-1.pdf>

¹¹ https://interagencystandingcommittee.org/sites/default/files/2023-11/ASC%20Definition%20%26%20Principles%20of%20a%20Victim_Survivor%20Centered%20Approach%20%28French%29.pdf

¹² In the online environment, grooming means that the abuser makes contact with the child in order to obtain sexual favors online (via a webcam) or through an offline meeting in order to sexually abuse him/her. https://ecpat-france.fr/www.ecpat-france.fr/wp-content/uploads/2023/06/Resume-executif-etude-live-streaming_WEB.pdf

¹³ In the context of online sexual exploitation, the phenomenon of livestreaming involves the live retransmission of sexual abuse via a livestreaming platform (such as skype), allowing the abuser to participate in the act as it occurs. https://ecpat-france.fr/www.ecpat-france.fr/wp-content/uploads/2023/06/Resume-executif-etude-live-streaming_WEB.pdf

Sexual abuse

For the purpose of this policy, sexual abuse is defined as any physical intrusion of a sexual nature committed by force or under threat within the context of an unequal power relationship. When proven, the threat of such harm is also reprehensible. Child abuse, sexual assault and pornography can all be considered sexual abuse¹⁴.

¹⁴ <https://www.unhcr.org/fr-fr/nos-activites/comment-nous-agissons/lutter-contre-l'exploitation-les-abus-et-le-harcelement-0>

PART 2 - PREVENTION, Case MANAGEMENT AND PROTECTION

Asmae's approach is based on three pillars:

1. Prevention and awareness-raising, as means of educating and accompanying Asmae employees, whatever their contractual status, and partners towards mindfulness and action;
2. Managing situations of concern or proven cases, in particular through
 - setting up a Prevention, and Case Management and Monitoring Committee and
 - precise reporting procedures ;
3. And finally, the protection of all those affected by a situation (whistleblowers, victims or perpetrators). Protection mechanisms are deployed as soon as cases are detected and include protecting the identity of whistle-blowers and the confidentiality of investigations¹⁵.

Through this articulated approach, Asmae places particular emphasis on creating a working environment where everyone feels supported, accompanied and protected, as well as a safe and trustworthy space for staff, partners and target groups.

2.1. Awareness and prevention

2.1.1. Information and awareness-raising

At all levels of Asmae, PHESA prevention and awareness plans must be put in place.

For instance, prevention and awareness-raising activities will include the annual review of PHESA, through the use of the self-assessment protocol, as well as onboarding sessions containing PHESA information for new staff.

All Asmae offices will be required to ensure that the core elements of the PHESA and its reporting procedure are available online, and in hard copies if necessary. A summary of the policy will also be made available in French and English in accessible format, including for people with disabilities, as well as in easy-to-understand such as pictograms, short and animated videos, etc...

¹⁵ The length of the investigation will depend on the complexity and seriousness of the situation, so it is difficult to establish a standard minimum or maximum duration.

The above-mentioned information and awareness-raising obligations also apply to partners who have signed a Memorandum of Understanding and are implementing projects supported by Asmae.

The focal points in each country where Asmae operates will also be responsible for supporting partners in setting up the system and running information and awareness-raising activities.

In addition, Asmae will ensure that various anonymous means for reporting incidents or situations of concern will be made available. The means of reporting must be also accessible to people with disabilities and in easy-to-understand formats, as mentioned above.

These may include :

- Suggestion boxes located in places where people wishing to use them cannot be identified (e.g. toilets);
- A dedicated mobile number ;
- A secure e-mail address (Proton mail type, allowing IP address protection).

Since the scope of this policy covers information and communication technologies, the policy will be also made available on Asmae's website in French and English, as well as in accessible and easy-to-understand formats. An Arabic version of the PHESA will be also made available in countries where Asmae's colleagues, partners and project targets use Arabic.

Furthermore, in all digital communications, Asmae undertakes to make visible its commitment to a world free from harassment, exploitation and sexual abuse offline or online.

As part of the support provided to partners in the implementation of this policy, the Asmae staff concerned will ensure the organization of regular follow-up meetings. Since this policy will need to be adapted to the different contexts in which Asmae operates, partners will be offered appropriate and safe spaces to deal with these issues. This could include PHESA presentation and awareness-raising sessions, the establishment of an action plan setting out milestones and a timetable, follow-up meetings using the self-assessment protocol, or supervision and analysis of professional practice.

Special measures may be discussed and implemented by the Head Office in complex contexts (security conditions, authoritarian regimes).

2.1.2. Human resources and staff training

As part of the recruitment process, each country in which Asmae operates, including France (Head Office and Social Action), will make sure to check the criminal records with competent authorities for successful

applicants. Written or oral questions to former employers may be also used to enable Asmae to establish whether candidates have been involved in any suspicious situation.

In addition, any person signing an employment contract, whatever their status, or a collaboration or consultancy agreement, in France or abroad, will have to read the policy, acquaint oneself with its appendix (declaration of commitment, self-assessment protocol, matrix containing support or sanction measures in the event of a proven HESA situation) and commit to abide by the terms of the policy by signing its Declaration of Commitment. Country-specific sessions will be also organized for the staff who are already working with Asmae in view of signing the policy and its Declaration of Commitment.

In addition, at the end of the probation period, all new recruits will be required to present a certificate showing the completion of free online training about the prevention and protection against harassment, exploitation and sexual abuse¹⁶. If the certificate cannot be presented, the employee will have to justify his or her reason and plan with his or her supervisor to comply with this obligation. Employees who are already part of Asmae's staff at the time of the policy adoption will be given one year to complete free online training. This will be verified by managers and the Human Resources department as part of annual appraisals.

Moreover, all those who act as protection focal points or hold positions as protection technical advisors or are in direct contact with the target groups of Asmae-supported actions will be offered training to deepen their knowledge of, for example, investigation management or the detection of signs of violence.

Managers should check this point as part of their annual appraisals and determine whether additional training is required.

Finally, since managers play a front-line role in setting up a safe working space for the employees, i.e communication, trusting relations and detecting signs of distress, all managers should be able to benefit from appropriate training, as well as peer-to-peer supervision and analysis of managerial practice.

¹⁶ Example of the following training offered by UNICEF: [Summary of Prevention of Sexual Exploitation and Abuse \(PSEA\) \(unicef.org\)](#) or this other one from DisasterReady [Free training: prevention of sexual exploitation and abuse | DisasterReady](#)

2.2. Managing investigations and situations of concern.

2.2.1. HESA Prevention, Case Management and Monitoring Committee

This policy establishes a committee to prevent, manage and monitor investigations and situations of concern. This Committee will eventually replace the Child Protection Committee, thus broadening its scope.

The main tasks of the Committee are as follows:

- Ensuring that the implementation, prevention and awareness-raising plans, as well as PHESA-related implementation plans, are set up and in line with the PHESA annual review.
- Receiving and processing reporting of incidents. It is recommended that, at the Head Office, reports concerning the situations of employees under French law, including expatriates, will be collected and processed initially by the Human Resources department and the anti-harassment staff representative, as employees perceive them to be neutral and impartial.
- Monitoring situations of concern and investigating any case of concern.

It will also determine the measures to be taken for each situation in relation to its seriousness, based on the matrix annexed to this policy.

The Committee will also be responsible for taking part in partner investigations if the case concerns a project supported by Asmae.

To this end, in order to ensure and guarantee its diversity, and to distribute the workload according to field of expertise and type of case, the Committee is organized into two levels.

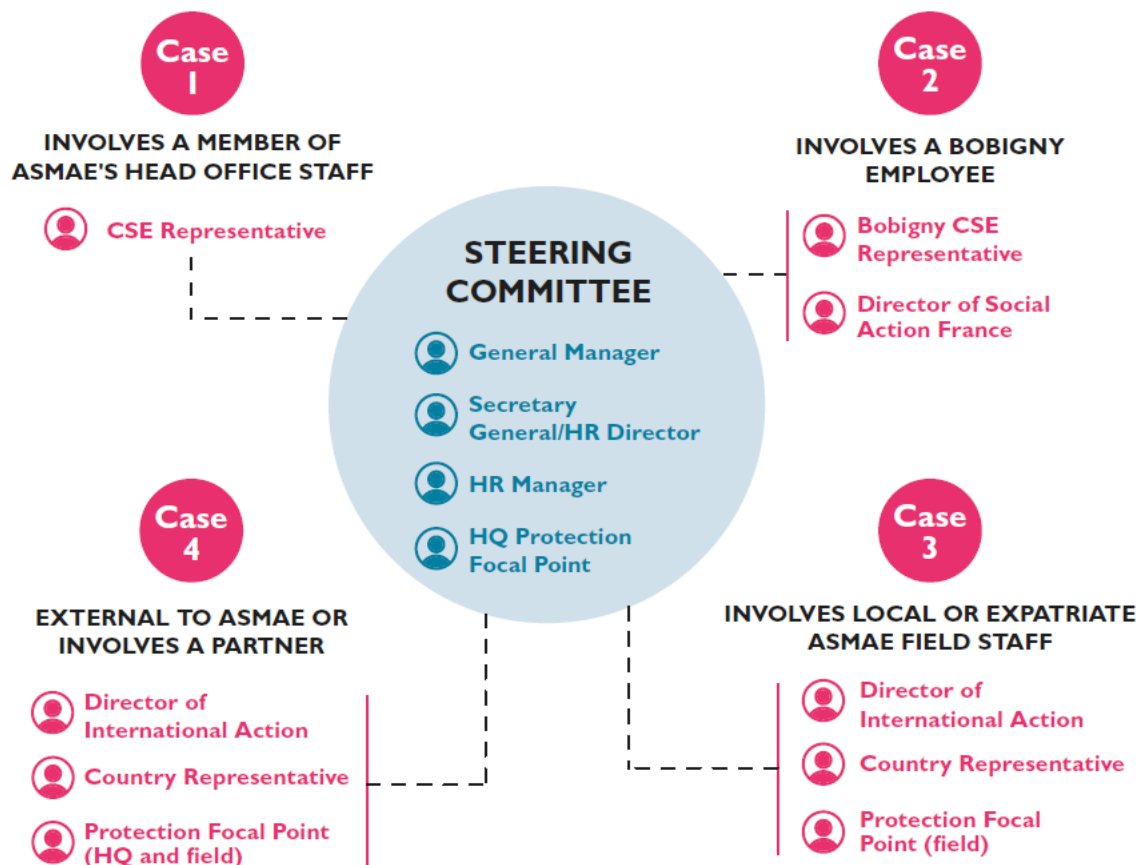
The first level, known as the **Permanent Committee**, will be responsible for collecting reports, processing them and taking the necessary steps. It will be also responsible for ensuring the conformity of operational plans, including prevention and awareness actions, following the annual PHESA review. The Permanent Committee is composed as follows:

- The General Director and the General Secretary.
- The Head of Human Resources.
- The Technical Advisor for Protection and Education.

The second level will be made up of non-permanent members who will be invited to take part in the Permanent Committee on a case-by-case basis.

COMPLAINT AND CASE MANAGEMENT COMMITTEE

Organized around a core of **permanent members** + **non-permanent members** invited to participate on a case-by-case basis :



Situation 1 - If the situation involves a member of Asmae's Head Office staff, a representative of the Social and Economic Committee (CSE) will be involved in Case Management and monitoring.

Situation 2 - If the situation concerns a Bobigny staff, a representative of the Bobigny CSE and the Director of Social Action France will be involved in Case Management and monitoring¹⁷.

Situation 3 - In the case of a staff member in one of Asmae's country offices, local or expatriate, the Director of International Action and the Country Representative will be involved in managing the case. Depending on the case and the needs, the Head Office protection focal point may be also involved.

Situation 4 - If the situation is external to Asmae, for example a person target by a project, or if the situation concerns an Asmae partner, the Director of International Action and the Country Representative

¹⁷ Bobigny is the town in France where Asmae carries out its social action projects.

will be invited to take part in the Committee. Depending on the case and the needs, the field protection focal point may be also involved.

It should be pointed out that, depending on the stages of the investigation and the situations to be managed, and in the interests of efficiency, confidentiality and fluidity, the Committee may be restricted to just a few of the people described for each situation above.

2.2.2. The reporting procedure

As mentioned above, each person who has read and signed this policy is responsible for reporting a situation of concern or a proven case of HESA identified within Asmae, a partner structure or a project.

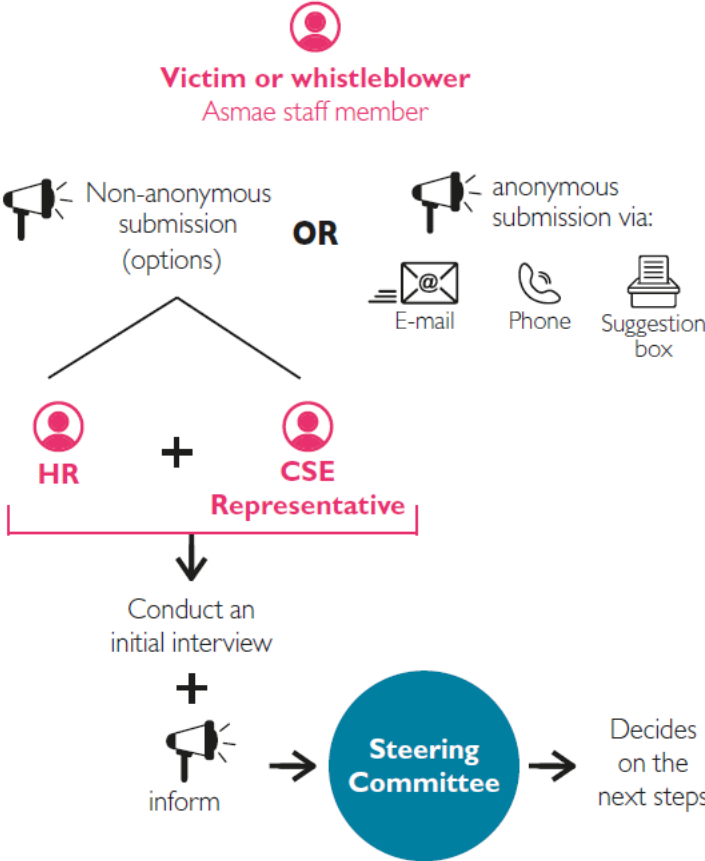
The reporting procedure includes both internal and external sections, and sets out the chain of information to be followed in the following situations:

- An Asmae staff at the Head Office (situation 1).
- An Asmae staff in Bobigny's Office (situation 2).
- An Asmae staff, local or expatriate (situation 3).
- An Asmae project's target or partner (situation 4).

As mentioned in section 2.2.1, the victim or the whistleblower can refer to the HESA Prevention, Case Management and Monitoring Committee anonymously through a dedicated phone number, a secure e-mail address or a suggestion box. However, depending on the context and the situation, the victim or whistleblower may refer the matter directly to one of the persons indicated in the reporting procedure.

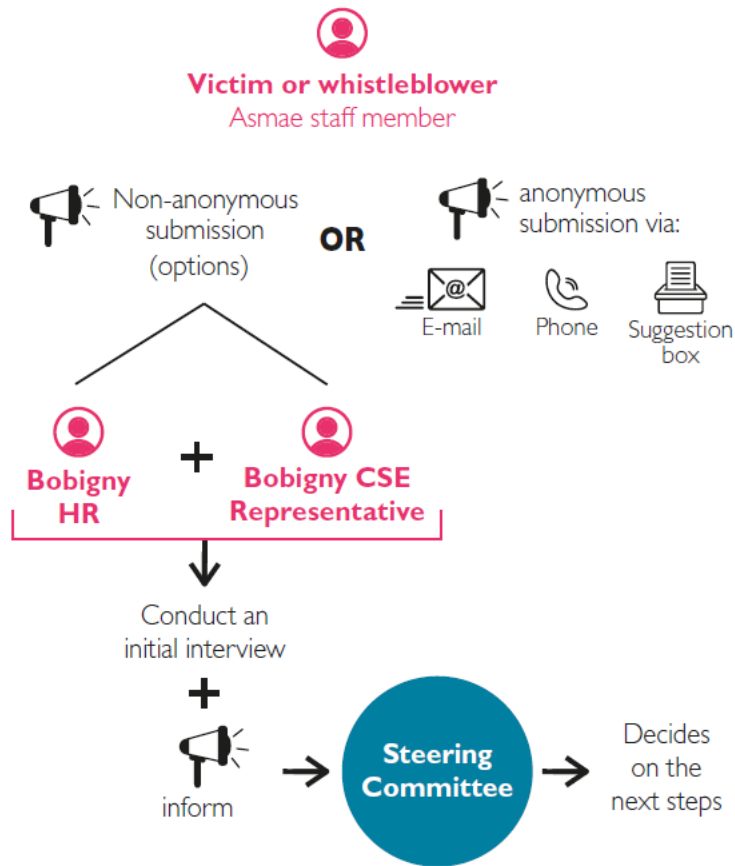
INTERNAL REPORTING PROCEDURE

CASE 1: involves a member of Asmae's head office staff



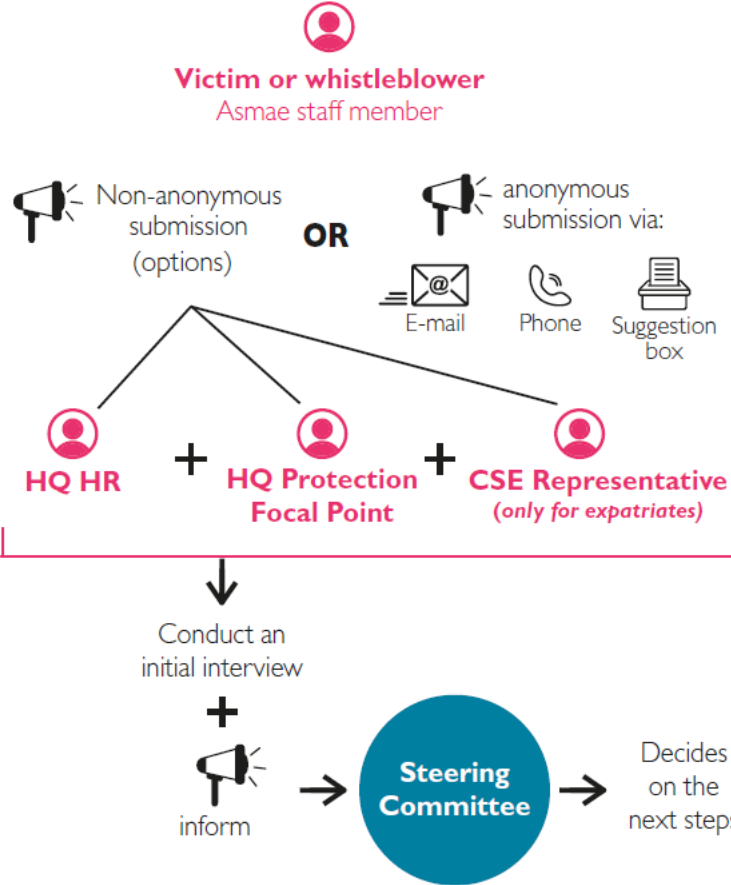
INTERNAL REPORTING PROCEDURE

CASE 2: involves a Bobigny employee



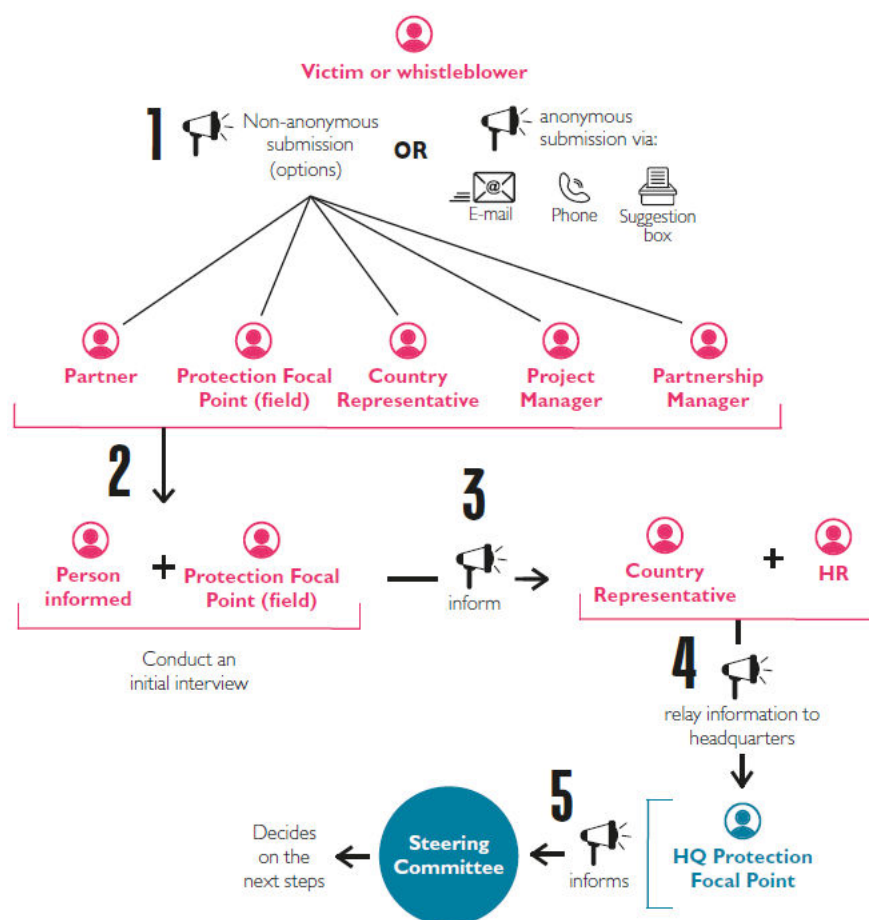
INTERNAL REPORTING PROCEDURE

CASE 3: involves local or expatriate Asmae field staff



EXTERNAL REPORTING PROCEDURE

Complaint by a partner, a community association representative or a project target



3.1. Protection of victims, whistleblowers and perpetrators

First of all, it is important to remember that a person will be only considered a victim or perpetrator of HESA once the investigation is completed.

As part of case management, the Committee will ensure that an effective protection system is in place to support victims, the whistle-blowers and perpetrators. This includes among others: supporting the victim throughout the procedure, ensuring the confidentiality of identities, as well as offering appropriate support if the whistleblower has witnessed abuse, harassment or exploitation directly, or accompanying the perpetrator in its reconstruction (in case of continued collaboration with the perpetrator). The type of support will be defined on a case-by-case basis, without excluding support from external professionals.

Finally, any person having reported a situation of harassment, exploitation or sexual abuse in a slanderous manner will be sanctioned, should this be established during the investigation.

3.1.1. Protecting whistleblowers

As a general rule, it is important to remember that anyone should feel free to alert and testify in complete safety, without fear of reprisals.

This is why it is so important to set up safe and anonymous means of reporting (see section 2.1.1 or the reporting procedure in this policy).

Moreover, if the whistleblower witnessed directly a HESA situation, he or she must be given the opportunity to request psychological support, or at least to take part in focus group discussions or other therapeutic activities in appropriate facilities.

It is also recommended that a member of the Committee follow up to ensure his or her psychological and emotional state throughout the investigation.

3.1.2. Protecting victims

First and foremost, it is important to separate the victim from the perpetrator, for example by offering the opportunity to work from home or changing the location of his or her daily activities (office, school, etc.). Attention should be also paid to the relation of trust existing between the victim and the perpetrator, as this can sometimes play a key role, especially in cases of exploitation or repeated abuse where the victim is under strong control. At community level, in the areas where Asmae operates, fear of reprisals from family or friends, loss of money, shame, or fear of being injured or die, can lead victims to withdraw their testimony or run away.

It is therefore recommended that the Committee (which can assign this task to a member) works on building trust by deconstructing the clutch on the victim before opening an investigation, as well as relying on specialized structures that will have been mapped out beforehand by each Asmae office, in France (Head Office and Social Action) and countries where Asmae operates.

Depending on the situation, the committee will provide the victim with appropriate medical, social and psychological support, directing him or her towards specialized structures or appropriate services.

This point, which requires special attention and extensive mapping work, will be given particular consideration in the implementation plan in the countries where Asmae operates. Depending on the

situation and the victim's wishes, psychological support and therapeutic well-being activities can be offered to the victim, depending also on his or her age.

Furthermore, during investigations, appropriate measures will be put in place to avoid any revictimization. For example, the testimony should be recorded to avoid the victim having to repeat it, but also to prevent the person from having to testify in front of many people or in intimidating environments, as well as respecting the person's pace and offering regular breaks.

If the victim is a child, the interview and investigation procedures should be adapted to the child's age and abilities.

Finally, if the victim is a member of Asmae's staff, support will continue until the investigation has been completed, and, for example, measures to adapt the victim's work shall be considered to enable him or her to continue working and ensure appropriate reconstruction.

In the case of a child victim or young person (over 18), Asmae will ensure follow up with the family, center or school attended.

This may take the form of meetings attended by the child and his or her parents or guardians, to consider the steps required for reconstruction.

3.1.3. Perpetrators

In case of concern, the perpetrator should be separated from the victim wherever possible, or the victim should be removed from his/her usual place of work or from the project in which he/she is involved. However, in situations where this distance might prove difficult in practice, in the victim's best interests (exam periods for students, temporary impossibility of teleworking, work in a difficult security context with an impact on travels, etc.), steps will be taken together with the victim to limit his or her contact with the perpetrator. In the case of a child victim, the child's explicit consent will be required, as well as that of his/her guardian, where applicable.

If a member of Asmae's staff is the perpetrator, precautionary layoff may be considered to keep him/her away from the victim.

During the investigation, it is important to adopt an impartial and objective stance, without prejudging the results of the investigation. Strict respect for the principle of confidentiality will be applied, to ensure equal protection among the parties concerned by the case.

At the end of the investigation, if an Asmae staff is guilty of the offence, depending on the seriousness of the offence, the perpetrator may be dismissed, or his or her position adapted and training provided. Asmae also undertakes to support the victim, including financially. In situations where the victim does not wish to lodge a complaint, Asmae undertakes to strongly encourage her/him to do so and offer support measures, including financial support.

If the person is from outside the organization, he or she will be referred to the appropriate services, where he or she can begin the process of rebuilding.

In any of the above cases, as part of the fight against impunity and the promotion of justice, legal remedies will be also provided depending on the nature and seriousness of the facts, as well as support measures for victims who wish to lodge a complaint.

PART 3 - Annexes

Annex I - Declaration of commitment

Annex II - Self-evaluation protocol

Annex III - Matrix of proportional measures

This document was presented to and approved by Asmae's Board of Directors on November 18, 2024.