



**THE PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE  
(PSEA) POLICY  
OF  
THE COMMUNITY INITIATIVE FOR PARTNERSHIP AND  
DEVELOPMENT (CIPAD)**

**REVIEWED BY:  
CIPAD MANAGEMENT TEAM IN AWEIL,  
OCTOBER 2025**

**APPROVED BY: CIPAD BOARD OF DIRECTORS IN AWEIL,**

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## **1. Purpose**

This policy aims to prevent, detect and respond to sexual exploitation and abuse (SEA) by ensuring a safe, respectful and dignified environment for beneficiaries, staff, partners and other stakeholders of CIPAD. It establishes clear procedures for reporting, investigating and addressing SEA in all CIPAD operations, programmes and partner activities. CIPAD is committed to a zero-tolerance culture towards SEA and will ensure appropriate victim-centred assistance, accountability, transparency and continuous risk reduction.

## **2. Scope of the PSEA Policy of CIPAD**

Humanitarian and development aid workers must uphold the highest standards of personal and professional conduct at all times to protect beneficiaries of assistance. Sexual exploitation and abuse (SEA) by aid workers, partner staff or anyone associated with humanitarian or development operations directly contradicts the principles of dignity, equality and protection on which humanitarian action is based, and constitutes a serious protection failure.

All CIPAD employees and related personnel are required to behave irreproachably with project beneficiaries or community members, with special care and sensitivity to the most vulnerable groups: children and minors, women and girls, older persons, persons with disabilities, displaced persons, socially marginalised groups. CIPAD commits to create and maintain a culture of zero-tolerance against complacency and impunity. CIPAD Management and supervisory staff are expected to create and maintain an environment that prevents, addresses and mitigates SEA risk.

Through this Protection from Sexual Exploitation and Abuse (PSEA) Policy, CIPAD clearly expresses its determination to prevent and combat sexual exploitation and abuse of beneficiaries and community members by CIPAD staff and related personnel. CIPAD's PSEA policy sets forth minimum standards and commitments to be followed to protect beneficiaries and community members from SEA.

This policy applies to all CIPAD personnel including, but not limited to:

- ✓ The Board of Directors and CIPAD senior management;
- ✓ All employees, collaborators, seconded staff, national and international, in all CIPAD structures and projects in South Sudan and overseas;
- ✓ Non-CIPAD entities and their employees and individuals who have entered into partnership, sub-grant or sub-recipient agreements with CIPAD, including committees, associations, networks, their members and staff, supported financially or otherwise by CIPAD;
- ✓ Consultants, freelancers, interns, volunteers, and individuals acting on behalf of CIPAD under service or consultancy contracts;
- ✓ Suppliers of any sort of goods, services or works, including current and potential suppliers;
- ✓ All persons not included in above categories who have signed a contract with CIPAD.

The principles set forth in this policy apply at all times, whether during or outside office hours, during leave or travel, and in any location where CIPAD operations are being carried out, with no exception.

### 3. Definitions

- **Survivor / Victim:** A person who has experienced sexual exploitation or abuse or an attempt thereof. For the purposes of these procedures, the person who reports SEA committed against themselves is regarded as a survivor for purposes of protection, support and referral.
- **Victim-centred approach:** An approach which places the rights, wishes, safety, dignity and wellbeing of the survivor at the centre of all response processes. It recognises informed consent, confidentiality, non-discrimination and the principle of “do no further harm”. ([psea.interagencystandingcommittee.org](http://psea.interagencystandingcommittee.org))
- **Confidentiality:** The principle that information regarding an allegation, the identity of a survivor, complainant or witness, and any investigation must be handled in a secure manner so as to protect privacy, prevent retaliation, and safeguard the integrity of the process.
- **Referral pathway / referral mechanism:** A set of clearly established services and procedures through which survivors of SEA can be referred for medical, psychosocial, legal, protection, material and other support services.
- **Investigation team:** A designated group or individual(s) with appropriate training and independence tasked with conducting fact- finding into an allegation of SEA, collecting evidence, interviewing relevant individuals, and producing a conclusion.
- **Retaliation:** Any adverse or discriminatory treatment of a complainant, survivor, witness, whistle-blower, or any person cooperating with an investigation, as a result of reporting or participating in the investigation of SEA.

### 4. CIPAD Policy Statement

SEA are a violation of CIPAD’s Code of Conduct, human-resources policies and other safeguarding frameworks. CIPAD does **not tolerate** (Zero-tolerance) any form of sexual exploitation and abuse, or bullying, harassment, discriminatory or abusive behaviour perpetrated by CIPAD staff, volunteers, consultants, contractors, partners or any related personnel, against any individual regardless of age, gender, disability, religion, ethnic origin or status.

CIPAD commits to take every reasonable measure to prevent its programmes and operations from having any negative consequences including SEA for beneficiaries and communities. All complaints and concerns about SEA will be taken seriously and will trigger a rigorous investigation, in accordance with this policy, CIPAD’s safeguarding framework and applicable national and international norms.

### 5. CIPAD Fundamental Principles

1. Sexual exploitation and abuse by CIPAD staff or related personnel constitute **gross misconduct** and are therefore grounds for disciplinary action up to and including termination of employment or contract, in line with applicable law and internal regulations.

2. Sexual activity with children (i.e., persons under the age of 18) is strictly prohibited regardless of local age of consent or majority. Mistaken belief regarding the age of a child is not a defence. A specific Child Safeguarding Policy further sets the operational procedures to guarantee child protection in all domains of CIPAD's work.
3. The exchange of money, employment, goods or services for sex, including sexual favours or other humiliating, degrading or exploitative behaviour, is prohibited. This prohibition includes the exchange of humanitarian assistance (which beneficiaries are entitled to) for sexual activities.
4. Sexual relationships between CIPAD staff and beneficiaries or community members are strongly discouraged and may be prohibited, because they are based on inherently unequal power dynamics and compromise the integrity of humanitarian and development work.
5. All CIPAD staff and related personnel who develop concerns or suspicions regarding sexual exploitation or abuse by any worker – whether they work for CIPAD or a partner organisation – have a duty to report such concerns through available mechanisms. Management must be informed of all concerns and suspicions, including credible rumours, in good faith regarding SEA.
6. All CIPAD staff, at all levels, are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of the Code of Conduct and other safeguarding policies.
7. CIPAD will, when appropriate and in compliance with survivor consent, report incidents for criminal prosecution and/or legal action to competent authorities under relevant national and international law.
8. The rights, safety, dignity and wishes of survivors must be paramount in all processes; procedures must cause **no further harm**, ensure confidentiality, respect informed consent, and include appropriate assistance and referral mechanisms.  
([psea.interagencystandingcommittee.org](http://psea.interagencystandingcommittee.org))

## 6. CIPAD Commitments

CIPAD is committed to fulfilling the core principles through implementation of the following commitments:

### 6.1. Prevention and Mitigation

- Managers and Human Resources must ensure a robust recruitment and screening process for all personnel, particularly persons who will have any direct or indirect contact with children or other vulnerable groups.
- CIPAD has in place a Code of Conduct that establishes, at minimum, the obligation for all employees and collaborators not to exploit, abuse or discriminate against people.
- CIPAD will actively engage with communities and relevant government and local stakeholders to prevent and respond to SEA. Local communities will be meaningfully involved in the design, implementation and monitoring of the Community-Based Complaints Mechanism (CBCM) and complaint-handling system, so that the structure is culturally, gender and age-sensitive.
- A Complaint Handling Mechanism (CHM) (or CBCM) for reporting sexual exploitation and abuse is in place and accessible. The CHM should not be a separate parallel system to

other feedback systems in the programme area but rather integrate with and build on existing mechanisms to ensure accessibility, transparency and legitimacy.

- CIPAD staff and related personnel shall be aware of the core principles in this policy, the related staff Code of Conduct, and other safeguarding frameworks.
- CIPAD will conduct regular risk assessments to identify SEA risks in operations and programming (including within partner organisations), and will take mitigation actions (e.g., safe programming, supervision, community awareness, safe recruitment, oversight of partners).
- CIPAD will include PSEA considerations in partnership agreements, donor contracts, grants and sub-grants, ensuring clauses related to PSEA, code of conduct, screening, referral pathways and audit rights are included.

## 6.2. Identification, Response and Assistance

- CIPAD will set procedures to process complaints of sexual exploitation and abuse in a timely, transparent and survivor-centred manner, including the **immediate suspension** of the alleged perpetrator from all activities with direct beneficiary contact or communities until the investigation concludes (or until a risk assessment justifies alternative measures).
- CIPAD will take steps to inform appropriate authorities (internal and external) responsible for conducting investigations of SEA allegations in accordance with national and international laws and safeguarding standards.
- CIPAD will ensure that beneficiaries and community members know how, where and to whom to report, and what kind of assistance they can expect. All potential and actual survivors of SEA must be fully informed about the complaint-mechanism, their rights, the referral services, confidentiality protections, and the steps in the process.
- Complainants and survivors have the right to receive, at their request and subject to privacy considerations, feedback on the development and outcome of their case, including what support was provided (without disclosing confidential details).
- **Victim/Survivor Assistance:** CIPAD undertakes to ensure timely, appropriate and survivor-centred assistance to any person identified as a victim/survivor of sexual exploitation or abuse by its staff or related personnel. Assistance is provided **regardless** of whether the survivor chooses to participate in, or cooperate with, an investigation or accountability process. The types of support may include, but are not limited to:
  - Immediate and ongoing safety and security measures (for example relocation, safe shelter, protection from retaliation or secondary trauma)
  - Medical care (including emergency care, treatment for sexually transmitted infections, pregnancy prevention, post-exposure prophylaxis (PEP) if available)
  - Psychosocial support and counselling (including trauma-informed care, peer support, specialised services)
  - Legal assistance and referrals (including assistance to access justice mechanisms, lodging charges, legal aid, support for witness participation)
  - Material and economic support where needed (for example dignity kits, basic household items, temporary cash support, livelihood assistance)
  - Child-appropriate support (for minors) and referral to child protection services, when relevant
  - Long-term follow-up, monitoring and support to the survivor's needs over time

- CIPAD will maintain a mapping of available service providers (medical, psychosocial, legal, protection, referral) and will update this mapping regularly. CIPAD will establish formal referral agreements or memoranda of understanding (MOUs) with service providers whenever possible.
- CIPAD will ensure service providers engaged for referral are trained to provide safe, survivor-centred, gender- and age-sensitive and inclusive services (including for people with disabilities, older persons, LGBTI+ persons).
- CIPAD will maintain confidentiality of the survivor’s identity, information about the incident and the process in all assistance and referral processes. Only those with a legitimate “need to know” will access identifiable information.
- CIPAD commits to monitor whether survivors receive the assistance they have been referred to, with the survivor’s informed consent, and will follow up to evaluate whether the support meets needs and adjust as appropriate.

### **6.3. Partner and Supplier Accountability**

- CIPAD will ensure that all third-party entities (partners, sub-grantees, consultants, suppliers) commit to respect the principles included in this PSEA Policy, as well as those in CIPAD’s Code of Conduct and other safeguarding policies. The acceptance and signature of this PSEA Policy (or a declaration form referencing it) is a pre-condition for engagement.
- For partners that do not have their own PSEA policy, this policy (or extract thereof) must be incorporated into the contract and accepted by the partner organisation.
- CIPAD reserves the right to audit, monitor, review and assess partner and supplier compliance with PSEA commitments, including via partner performance reviews and compliance visits.

## **7. Prohibited Behaviours / Misconduct**

As per this policy, the following behaviours are strictly prohibited:

- ✓ Any sexual activity with a child (under age 18), regardless of local laws or consent.
- ✓ Exchange of money, employment, goods or services for sex (transactional sex) in any context where there is a power relationship related to assistance or services.
- ✓ Sexual relationships between staff (or related personnel) and beneficiaries/community members, due to inherent power imbalance and risk of exploitation.
- ✓ Using threats, intimidation, or promises of assistance to solicit sexual acts.
- ✓ Taking or sharing sexually explicit photos, videos or messages involving staff, beneficiaries or community members without informed consent, especially where a power imbalance exists.
- ✓ Favouritism or preferential treatment of beneficiaries in exchange for expectations of sexual or personal relationships.
- ✓ Interfering with, obstructing or retaliating against SEA investigations, including intimidation or threats against complainants, survivors or witnesses.
- ✓ Workplace sexual harassment, workplace sexual misconduct, grooming or coercion related to sexual conduct.

- ✓ Online or digital misconduct of a sexual nature (including sexting, sharing indecent images, online grooming) in the context of benefit/aid work or community interaction.
- ✓ Any form of safeguarding violations or abuse of power related to sexual conduct.

## **8. Consequences for Violation of Prohibited Behaviours/Misconduct**

Violation of this PSEA policy, whether by staff, volunteers, contractors, consultants or partner organisations, is considered **gross misconduct** and will result in serious consequences, including legal and administrative actions as outlined below:

### **(a) Disciplinary measures for staff and representatives:**

- Immediate suspension pending investigation to ensure safety of all parties;
- Termination of employment or contract if allegation is substantiated;
- Referral to law enforcement or legal authorities (with the survivor's informed consent and where appropriate) in line with national laws;
- Ineligibility for future employment with CIPAD (or its partners);
- Notification to relevant donors, safeguarding clusters or professional bodies as required.

### **(b) Consequences for partner organisations or contractors:**

- Suspension or termination of partnership agreements;
- Withholding of funds or claw-back of resources where appropriate;
- Removal from procurement or partnership eligibility (blacklisting) for future opportunities;
- Reporting to donor agencies, regulatory bodies or relevant safeguarding networks.

### **(c) Protection from retaliation:**

- Retaliation against a person who reported SEA in good faith, or cooperated with an investigation, will lead to immediate disciplinary action up to and including dismissal.
- CIPAD will provide support to persons facing retaliation including psychosocial and legal assistance and ensure safe reporting pathways and confidentiality protections.

### **(d) False or malicious allegations:**

- Knowingly making false or malicious SEA allegations is a serious breach, which may result in disciplinary action including termination of contract and/or legal consequences under local law.

## **9. Reporting Channels**

Reports of SEA can be made by any person (staff, partner, community member, beneficiary) through the following confidential channels:

- Email: [psea@cipadsouthsudan.org](mailto:psea@cipadsouthsudan.org)

- Phone: +211 913 133 343
- Through the Community-Based Complaints Mechanism (CBCM), Accountability to Affected Population (AAP) Committees, and other community-based protection/feedback mechanisms in programme areas

The reporting channels must ensure confidentiality, simplicity, multiple entry points (including anonymous or safe channels), accessibility in local languages and modes appropriate for persons with disabilities or other vulnerabilities.

## 10. Investigation Procedures, Confidentiality and Process

The following procedures will guide investigations of SEA allegations, and include additional confidentiality and survivor-rights protections:

- **Acknowledgement and logging:** Upon receipt of an allegation, the SEA Focal Point will log it securely within 24 hours, conduct a preliminary triage and risk assessment (including the need for survivor protection, safety planning, immediate referral).
- **Immediate protective actions:** Where appropriate, immediately suspend or restrict the alleged perpetrator's access to beneficiaries/communities, secure evidence, and ensure the safety and support of survivors, complainants and any witnesses.
- **Investigation team composition:** The Investigation Team shall be led by an experienced and trained SEA investigator (internal or external) with expertise in gender, child protection, trauma-informed interviewing, and legal/forensics where needed. Gender-balanced teams are preferred, and the team shall act with independence, impartiality and transparency.
- **Confidentiality and data protection:** All information relating to allegations, survivors, complainants, witnesses and evidence must be handled in accordance with strict confidentiality safeguards. Access to documents is restricted to those with legitimate need and stored securely (electronic files password-protected, physical files locked). Any sharing of personal identifiable information (PII) will only occur with explicit consent, or when required by law and safeguarded.
- **Data access and information sharing:** Data will only be shared on a need-to-know basis. When collaborating with partner organisations or external agencies, data-sharing agreements or memoranda will be used to ensure confidentiality, data security and survivor protection.
- **Investigation process steps:**
  1. Triage and planning – risk assessment, survivor safety plan, scope of investigation.
  2. Evidence collection – interviews with survivor (with their informed consent), complainants, witnesses; review of documents, data, digital evidence; preservation of forensic evidence.
  3. Analysis and conclusion – assessment of credibility, findings, recommendations, including safeguarding and system learning.
  4. Report – a written investigation report is submitted to senior management and, if appropriate, to the Board and to external authorities, containing findings, recommendations for action (disciplinary, referral, preventative measures).

- **Outcome and accountability:** If allegations are substantiated, CIPAD will take prompt action (termination, legal referral, partner termination). If allegations are not substantiated, the case is closed, documented and no retaliation is permitted against complainant or survivor.
- **Feedback to complainants and survivors:** Subject to confidentiality and legal constraints, CIPAD will provide feedback to the complainant and/or survivor about the outcome of the investigation, what actions have been taken, and information about available protection and assistance measures.
- **Record-keeping and secure archiving:** Investigation records will be archived securely for a defined retention period in line with national law, donor requirements and organisational policy, after which they will be destroyed or anonymised to protect survivor privacy.
- **Learning and systemic improvement:** CIPAD will analyse trends from investigations (anonymised, aggregated data) to identify risk-areas, root-causes and programme adjustments to reduce SEA risk in future.

## 11. Victim/Survivor Assistance and Referral Services

CIPAD is committed to a comprehensive, victim/survivor-centred response that ensures timely access to assistance and referral services. Key provisions include:

- Assistance will be offered irrespective of whether the survivor chooses to make a formal complaint or cooperate in an investigation.
- On receipt of information indicating someone may be a victim of SEA, CIPAD will ensure referral to appropriate service provider(s) as soon as possible (ideally within 24 hours) to avoid delay in care and support.
- CIPAD will maintain and regularly update a referral directory of local medical, psychosocial, legal, protection, livelihood and emergency services; and where referral services are weak or unavailable, CIPAD will explore safe alternatives or support the creation of services.
- Where necessary, and with survivor consent, CIPAD will coordinate with other agencies (GBV, child protection, health, legal) etc or authorities to provide cross-sectoral support.
- In cases where the service provider is beyond reach, CIPAD will make provision for transportation, emergency costs or accompany the survivor to ensure access to assistance.
- All responses will respect the dignity, rights and preferences of the survivor, including informed consent, confidentiality, preference of gender of service provider, safe location, and ongoing follow-up and monitoring of survivor safety and wellbeing.
- CIPAD will ensure that survivors have access to information about their rights, available services, the process of complaint, investigation, referral and assistance, in a language they understand and appropriate to their age, gender, disability and cultural context.
- Outreach and community-awareness activities will highlight that assistance is free, voluntary, does not depend on cooperation in an investigation, and that survivors will not be penalised for reporting.
- CIPAD will ensure that survivors are not re-victimised or re-traumatised by the process: interview procedures will be trauma-informed, voluntary and conducted only by trained personnel; safe spaces will be provided for interviews and support.

- CIPAD will monitor whether the referral and assistance services were actually accessed and if they met the survivor’s needs; where gaps are identified, CIPAD will engage with providers or explore alternative options.
- CIPAD will maintain survivor anonymity in reports and internal records, unless the survivor explicitly consents to disclosure and this is safe.

## **12. Staff Capacity Building**

To promote a safe and protective culture, CIPAD will implement the following:

- Induction and orientation: All new staff (national and international), consultants, volunteers and partner personnel must receive PSEA training as part of onboarding; must sign the Code of Conduct and a PSEA commitment form; and be made aware of referral pathways, reporting channels and survivor assistance mechanisms.
- Ongoing training and refresher courses: Annual PSEA refresher training will be organized for all staff; role-specific training will be provided for HR, managers, field staff, PSEA focal points, Protection/GBV/CP staff. Training will include topics such as: survivor-centred approach, trauma-informed interviewing, data confidentiality, referral and service mapping, community complaints mechanisms, risk mitigation in programming, partner oversight.
- Community awareness and outreach: CIPAD will conduct PSEA awareness sessions in programme communities, in local languages, with accessible materials (posters, flyers, radio/audio messages) explaining rights, how to report, how survivors will be assisted, and emphasising that assistance is free and does not depend on sexual favours.
- Partner capacity building: CIPAD will provide training and support to partners, suppliers and contractors on PSEA standards, reporting and referral mechanisms, and will review partner capacity regularly.
- Monitoring, evaluation and learning: CIPAD will monitor implementation of this policy (e.g., number of investigations, referrals made, training delivered, community awareness sessions) and will conduct periodic reviews of PSEA performance, identify lessons learned, update procedures, and integrate improvements into programmes. CIPAD will include PSEA risk and indicators in programme design, monitoring & evaluation frameworks.
- Leadership accountability: Senior management and board members will receive periodic briefings on PSEA performance, emerging risks, investigation outcomes, referrals and policy implementation; PSEA focal points will have sufficient resources and authority to oversee PSEA compliance and system strengthening.

## **13. Monitoring, Review and Continuous Improvement**

CIPAD will monitor compliance with this policy through regular audits, reviews, spot-checks, feedback from communities, and tracking of key performance indicators (KPIs) such as number of referrals, training participation, community awareness reach, investigations concluded, protection of survivors and complainants, partner compliance. The policy will be reviewed at least every two years or whenever major changes in context, legislation or organisational structure arise. CIPAD will ensure that findings from monitoring and investigations feed into organisational learning, risk mitigation measures and programme adaptation.

## 14. Governance and Oversight

The Board of Directors and senior management hold ultimate responsibility for oversight of PSEA implementation and culture within CIPAD. A named **PSEA Focal Point** (or team) shall be designated within CIPAD, reporting directly to senior management, with clear roles, responsibilities, resources and authority. The PSEA Focal Point shall ensure coordination of all PSEA activities including prevention, reporting, investigation, referral, capacity- building and monitoring. Partnerships, contracts and supplier agreements must include PSEA clauses and compliance monitoring.

## 15. Annexes

- Annex 1: SEA Intake/Incident Report Form
- Annex 2: PSEA Reporting and Referrals Operating Procedures
- Annex 3: SEA Case Investigation Confidentiality Procedures
- Annex 4: List of Service Mapping format
- Annex 5: Referrals Form
- Annex 6: Safeguarding Policy
- Annex 7: Code of Conduct
- Annex 8: Self-Declaration Form
- Annex 9: Whistleblowing Policy
- Annex: 10: Human Resource Policy
- Annex: Child Protection Policy
- Annex: Gender Policy

## 16. Approval and Sign-Off

On behalf of the Board of Directors

Name: Asunta Aguak, Dumo

Title: Board Chairperson

Signature: 

Date: 29<sup>th</sup> October 2025