



**TREES
FOR THE
FUTURE**

Policy for Prevention, Reporting, and
Response to Sexual Exploitation, Abuse,
and Harassment

March 2023

Version 1.0

1. SCOPE & PURPOSE

This policy sets out Trees for the Future's (TREES) approach to preventing and addressing sexual exploitation, abuse, and harassment (PSEAH) and applies to all TREES Employees and Related Personnel¹ both during and outside normal working hours.

2. POLICY STATEMENT

At TREES, we believe all people have a right to live their lives free from sexual violence and any abuse of power regardless of age, gender, sexuality, sexual orientation, disability, religion, or ethnic origin. We recognize that there are unequal power dynamics across the organization and in relation to those we serve, and this can lead to some people exploiting their position of power for personal gain. TREES is committed to providing a safe environment for all its employees, free from discrimination on any grounds and from harassment at work, including sexual harassment. TREES will operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously, and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment.

All complaints of sexual harassment will be taken seriously and treated with respect and confidence. No one will be victimized for making such a complaint in good faith.

TREES WILL NOT TOLERATE:

- any form of sexual harassment, sexual exploitation, or sexual abuse by any of its employees, volunteers, consultants, partners, or any other representative associated with the delivery of its work.
- Inaction against observed sexual harassment, exploitation, and abuse.

TREES COMMITS TO SUPPORTING SURVIVORS and continuously improving safeguarding capacity, reporting, investigating, responding to, and preventing sexual harassment and sexual exploitation and abuse.

3. Definitions for This Policy

Sexual Harassment: Sexual harassment is any unwelcome sexual communication, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or perceived to cause offense or humiliation to another. Such conduct will be considered sexual harassment when it interferes with work, is made a condition of employment or advancement, or creates an intimidating, hostile or offensive work environment. While typically involving a pattern of behavior, it can take the form of a single incident. Sexual harassment may occur between persons of the opposite or same sex. Both males and females can be either the victims or the offenders.

Sexual Exploitation: Any actual or attempted abuse of a vulnerable person, including but not

¹ Related Personnel refers to non-employed persons who participate in TREES programs. They may include consultants, Board Members, guest visitors to projects, volunteers, interns, or others who may be sanctioned by TREES to participate in TREES activities.

limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. TREES recognizes that the terms sexual abuse and exploitation represent a wide spectrum of behavior and are not limited to the act of sexual intercourse.

Sexual Abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This would include inappropriate touching, rape, forced marriage, and sexual slavery and also includes sexual activity with a child (any person under the age of 18),

Sexual Relationship: Includes but is not limited to an employee or consultant having a physically intimate relationship, or an online sexually related relationship via social media, text, or telephone.

Child Sexual Abuse: When a child is used by another child, adolescent, or adult for his or her own sexual stimulation or gratification. Sexual abuse involves contact and non-contact activities which encompasses all forms of sexual activity involving children, including exposing a child to online child sexual exploitation material or taking sexually exploitative images of children.

Survivor: The person whom it is alleged has been the subject of sexual harassment, abuse, or exploitation.

Complainant: The person who raises a complaint (this may or may not be the survivor).

Subject of Complaint/Subject of Concern/ SoC: The person against whom the allegation, complaint, or concern has been raised.

Suspicion of misconduct: A concern that has been raised through any of the reporting pathways. This suspicion is assessed at an initial case conference/stakeholder panel.

Allegation of misconduct: If, at case conference/stakeholder panel stage there is a decision to investigate the suspicion of misconduct then it is treated as an 'allegation of misconduct'.

Outcome of Investigation: Once an allegation is investigated and the investigation report is reviewed, the resulting recommendations are referred to as the 'outcome of investigation'.

4. TREES PSEAH PRINCIPLES

TREES is committed to full implementation of this policy in keeping with standards set by the United Nations²

Our Core Principles are as follows:

1. Sexual exploitation and abuse by TREES Employees and Related Personnel constitute acts of gross misconduct and are, therefore, grounds for termination of employment or contract/agreement. Sexual harassment by TREES Employees and Related Personnel is

² The Inter-Agency Standing Committee Minimum Operating Standards on PSEA and the Core Humanitarian Standard on Quality and Accountability. The six Core Principles are from the UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13). They have been modified by TREES to refer to sexual harassment and "TREES Employees and Related Personnel".

grounds for disciplinary action up to and including dismissal.

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.
3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading, or exploitative behavior by TREES Employees and Related Personnel is prohibited at all times. This includes buying sex or the exchange of sex for the assistance that is due to program participants.³
4. Sexual relationships between TREES Employees or Related Personnel and community members we work with are forbidden. Such relationships may be based on inherently unequal power dynamics and may undermine the credibility and integrity of TREES's agroforestry work. TREES Employees and Related Personnel must declare any previously existing relationships with community members we work with to their line managers or HR focal point.
5. Where a TREES Employee or Related Personnel develops concerns or suspicions regarding sexual abuse or exploitation or sexual harassment by a fellow worker, whether in TREES or not, he or she must immediately report such concerns via the established reporting mechanisms.
6. TREES Employees and Related Personnel are obliged to create and maintain an environment that prevents sexual exploitation, abuse and harassment, and any form of child abuse⁴ and promotes the implementation of this Policy.

TREES Managers at all levels have a particular responsibility to support and develop systems, which maintain this environment.

5. TREES's Commitments

TREES will:

- **Make every effort to create and maintain a safe, equitable, and inclusive organizational culture** where all those who work for and with TREES as well as those in the communities where TREES operates are treated with dignity and their rights and voices are heard and respected.
- **Make multiple channels available for TREES employees, Related Personnel, community members, and others to safely report sexual exploitation and abuse and sexual harassment.** These channels will be designed in consultation with local communities and staff to ensure that they are safe and accessible.
- **Ensure that TREES employees and those we serve have information about how to access safe reporting channels,** including messaging that is suitable for children and

³ TREES's Code of Conduct strictly prohibits the exchange of sex for money. TREES does not make judgment against individuals who participate in selling sex in exchange for money or something else such as gifts or material support ("transactional sex"). However, TREES has banned buying sex in order to prevent sexual exploitation and abuse from occurring.

in their appropriate languages. This will include posting reporting procedures in local languages and regularly explaining these channels.

- **Provide training to all staff and particularly for Focal Points** to receive complaints, to ensure they understand their obligations and how to discharge their duties should they receive a complaint.
- **Respond in a professional and timely manner to all concerns or allegations of sexual exploitation, abuse, or harassment.** All concerns or allegations will be taken seriously and investigated and acted upon where appropriate, in line with our safeguarding principles listed below.
- **Take a survivor-centered approach** which includes:
 - Safety: The safety and security of the survivor and her/his children is the primary consideration.
 - Confidentiality: Survivors have the right to choose to whom they will or will not tell their story, and information will only be shared with the informed consent of the survivor. There may be instances where an imminent threat of harm to a child or someone else may override confidentiality.
 - Respect: All actions taken should be guided by respect for the choices, wishes, rights and dignity of the survivor. The role of safeguarding teams is to facilitate recovery and provide resources to aid the survivor.
 - Non-discrimination: Survivors will receive equal and fair treatment regardless of their age, gender, race, religion, nationality, ethnicity, sexual orientation, or any other characteristic.
- **Undertake robust and accountable case management.** All allegations of SEAH, and subsequent follow-up, will be documented in a secure and confidential database. The report will be officially acknowledged within 24 hours, and a safeguarding team will convene a case conference to assess immediate risks and next steps within 72 hours.
- **Carry out independent, safe, and discreet investigations,** through trained investigators, recognizing the rights of and duty of care to everyone involved, including complainant and/or survivor, witnesses, and subject of complaint (SoC).
- **Take swift and appropriate action against TREES Employees and Related Personnel who are found to have committed SEAH.** This may include administrative or disciplinary action, and/or referral to the relevant local authorities if appropriate and safe to do so. An independent and gender-representative decision-making panel will be assigned in every investigation to ensure impartiality, transparency, and accountability (e.g., for country cases the panel may include people from outside of the country).
- **Refer survivors to competent support services** as appropriate and available and according to the wants and needs of the survivor. This may include specialist psychosocial support such as counseling, medical assistance, legal advice, and access to TREES's Employee Assistance Programs (where available). Assistance will be made

available regardless of whether a formal internal response is carried out (such as an internal investigation).

6. Roles and Responsibilities

All TREES Employees and Related Personnel: Everyone who works on behalf of TREES is required to report any suspicions or incidences of SEAH of others. Failure to report to a relevant person suspicion of SEAH relating to someone else is a breach of TREES policy and could lead to disciplinary action being taken against employees and the termination of TREES's relationship with non-employees. There is no obligation for an individual to report any incident that has happened to them.

Directors and Managers are responsible for promoting awareness of this policy with the people they manage and for supporting a safe working environment. This also includes the responsibility for ensuring that all staff and Related Personnel receive regular PSEAH trainings, with a particular emphasis on staff who are in direct contact with the people we serve. Managers are expected to prioritize PSEAH awareness raising for themselves and their individual departments or teams and provide budget lines for some activities.

Safeguarding Focal Points will raise awareness and promote best practices by receiving concerns, supporting survivors, and reporting concerns in a confidential manner within their management team or to the Senior Director, Human Resources, or the whistleblower hotline.

7. RAISING A COMPLAINT OR CONCERN

TREES Employees and Related Personnel have a responsibility to report any suspicion or concern of SEAH. Any individual can raise a concern/complaint to TREES about an incident they have experienced, witnessed, or heard about concerning a TREES staff member or partner (suppliers, partners, contractors, etc.) without fear of retribution.

TREES Employees and Related Personnel *must not* investigate allegations or suspicions themselves. Investigations are carried out by professional / trained investigators with experience in the field of SEAH. Decisions about a case concerning a child will be made in conjunction with their parent/ guardian wherever possible.

Reporting Channels

Anyone (including members of the community TREES works with) can raise a concern or make a complaint to TREES about something they have experienced or witnessed without fear of retribution. You can do this verbally or in writing to your manager, Human Resources, your Country Director, or any member of senior management.

If for any reason you are uncomfortable with these options, you can report using the TREES Whistleblower Hotline:

Web Address: <https://www.lighthouse-services.com/trees>

Phone: 800.603.2869

EMAIL: reports@lighthouse-services.com

Supervisors and managers are required to report complaints or concerns that they receive about suspected sexual exploitation, abuse, or harassment in writing to the Global Human Resource Director, who has the responsibility to review all reported complaints and where required, arrange for the necessary investigatory procedures. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Global Human Resource Director.

Confidentiality

Complaints can be made anonymously. Every effort will be made to maintain confidentiality throughout the complaints process. Information that identifies individuals involved in a complaint will be limited to personnel with the absolute need to have such information and will not be shared further without obtaining the informed consent of the survivor, except if someone's life is at risk, a child is at risk, or as required by law in consultation with legal counsel and where safe to do so.

Non-identifying information will be shared as per donor and regulatory body reporting requirements.

Staff involved in the complaints process will be made aware of the importance of maintaining confidentiality and may be asked to sign a confidentiality agreement. Employees who breach confidentiality may be subject to disciplinary action up to and including termination of employment, and others who work with TREES may have their relationship with TREES terminated. In some cases, such breaches may constitute breaking the law.

Retaliation against Complainants, Survivors, and Witnesses

TREES will take action against anyone, whether they are the subject of a complaint or not, who seeks or carries out retaliatory action against complainants, survivors, other witnesses, or the subject of the complaint. Employees may be subject to disciplinary action, up to and including termination of employment. Others who work with TREES may have their relationship with TREES terminated.

Complaints about TREES's Partners or external organizations/bodies

When TREES receives a complaint about a partner organization, TREES will expect the partner to respond safely, quickly, and appropriately. TREES will assist the partner to ascertain its reporting obligations. TREES will not investigate cases related to other organizations, but it will meet its obligation to report and pursue the matter for the protection of staff and farmer clients.

8. Embed PSEAH into TREES Work Practices

Safer Recruitment: In compliance with applicable laws, TREES is committed to preventing perpetrators of SEAH from being hired, (re)hired, or (re)deployed. Managers and Human Resource teams will ensure robust recruitment screening processes (e.g., pre-screening using Criminal History Checks or similar) for all personnel, including employees, volunteers, consultants, and other representatives. As part of this, all application forms, interviews, and references must address Safeguarding and equality requirements and attitudes.

Safe Partnership Agreements: TREES will ensure that, when engaging in partnerships, sub-grant or sub-recipient agreements, these agreements: (i) incorporate this Policy as an

attachment; (ii) include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to abide by a Code of Conduct that is pursuant to the standards of this Policy; and (iii) expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against sexual exploitation and abuse and sexual harassment, to investigate and report allegations thereof, or to take corrective actions when SEAH has occurred, shall constitute grounds for TREES to terminate such agreements.

Staff and partner training: TREES Employees and Related Personnel must receive as part of their induction trainings on PSEAH and Safeguarding when they join TREES, including a briefing on TREES’s policies and values, the Code of Conduct, information about how to report concerns and advice about where to seek further information about safeguarding and safer practices across the organization. Anyone working directly with community members on behalf of TREES must receive additional training on how to receive complaints and handle them in a safe and confidential manner.

Accountability to the Communities we work with: TREES commits to promoting accountability towards individuals and the communities where we work by (i) being transparent about TREES programming, activities, and services they are entitled to; (ii) raising awareness about TREES Code of Conduct, safeguarding policies, and reporting channels; (iii) actively seeking feedback from communities on TREES’s work, individual behaviors, and complaints; and (iv) presenting feedback to communities on what changes have been made resulting from community feedback – ideally by a senior TREES representative. The above steps should occur regularly throughout the lifecycle of the program or activity.

Safe Programming: TREES Employees and Related Personnel are required to take proactive measures to avoid causing inadvertent harm to client farmers, their families, or communities. This includes embedding good practice and SEAH prevention measures throughout the program and project cycle, including project design, grant proposals, assessments, complaints and feedback mechanisms, and monitoring and evaluation.

I have read and understood the contents of this policy document and hereby agree to abide by its terms and conditions. By signing this document, I acknowledge my acceptance of this policy.

Signature: _____

Date: _____