



## Prevention of Sexual Exploitation, Abuse and Harassment of Beneficiaries Policy

Policy Owner	Global People
Policy issuance	December 2019
Last updated	January 2025
Regions/Offices	Global
Contact Details	Anindita Singh, Senior Safeguarding Officer <a href="mailto:safeguardingconcerns@3ieimpact.org">safeguardingconcerns@3ieimpact.org</a>  Culture and Ethics committee <a href="mailto:cec@3ieimpact.org">cec@3ieimpact.org</a>

### New Delhi

Unit no. 501A, 5th Floor, Rectangle-1  
D-4, Saket District Centre  
New Delhi - 110017, India

[3ie@3ieimpact.org](mailto:3ie@3ieimpact.org)  
Tel: +91 11 4110 2159

### London

1 Poultry London  
EC2R 8EJ  
United Kingdom

[3ieuk@3ieimpact.org](mailto:3ieuk@3ieimpact.org)  
Tel: +44 20 3695 7895

### Washington, DC

1111 19th Street, NW, Suite 700  
Washington, DC 20036  
United States of America

[3ieus@3ieimpact.org](mailto:3ieus@3ieimpact.org)  
Tel: +1 202 629 3939

## Contents

1. Purpose .....	3
2. Scope .....	3
3. Definitions .....	3
4. Principles of safeguarding of beneficiaries .....	5
5. Prohibited conduct .....	5
6. Reporting of prohibited conduct .....	6
7. Confidentiality .....	7
8. Responsibilities .....	7
9. Implementation .....	7

## 1. Purpose

3ie is committed to ensuring that all individuals with whom we interact through our work. Through this policy, we express our commitment to combating the sexual exploitation, abuse and harassment of children and vulnerable adults benefiting from or impacted by 3ie's work by having a zero-tolerance approach and implementing measures to reduce risks on its programmes.

## 2. Scope

This policy applies to all persons working with or collaborating with 3ie, including but not limited to full or part-time employees, consultants, board members, members, agency workers, seconded workers, agents, contractors and suppliers or downstream partners. The policy applies consistently and without exception across our locations and programmes, and to all situations, professional or outside work.

3ie will proactively identify, prevent and guard against all risks of harm, exploitation and abuse, by means of transparent systems for reporting and response and following survivor-centered resolution process.

## 3. Definitions

- **Sexual exploitation and abuse**

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

- **Sexist Behavior**

Any behavior related to a person's sex, which has the purpose or effect of violating their dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

- **Sexual harassment**

Sexual harassment is any unwelcome predatory conduct of a sexual nature, which makes a person feel offended, humiliated, and/or intimidated. It encompasses physical, verbal, and non-verbal misconduct, such as unwelcome physical contact, sexual advances, inappropriate comments, and suggestive gestures.

Examples of conduct or behaviors that constitute sexual harassment include, but are not limited to, the types of conduct illustrated below.

- ***Physical***

The following list provides indicative but not exhaustive examples of physical sexual harassing conduct:

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling or inappropriate touching
  - Physical violence, including sexual assault
  - Physical contact, e.g. deliberately touching or pinching
  - Use of job-related threats or rewards to solicit sexual favours
  - Showing pornography directly or in proximity
- **Verbal or written**
- Comments or questions on a person's appearance, age or private life of a sexual or threatening nature;
  - Comments or stories having some sexual element implicitly or explicitly, which may be humorous, derogatory, condescending, sexist or heterosexual;
  - Sexual advances;
  - Repeated and unwanted social invitations for dates or physical intimacy;
  - Insults based on the sex of the employee;
  - Sending electronic mail messages, voice mail messages, SMS, WhatsApp or fax; posting on social media; sending any material of a sexual nature downloaded from the internet; or making offensive telephone calls; sending unwanted gifts of any nature; or
  - Innuendo, including sexually provocative remarks, suggestive or derogatory comments about a person's physical appearance, inferences of sexual morality or tales of sexual performance.

- **Non-verbal**

The following list provides indicative but not exhaustive examples of non-verbal sexual harassing conduct:

- Display of sexually explicit or suggestive material or material that may cause offence or intimidate, such as screen savers or other computer or mobile displays, wall papers, pictures, calendars, posters, objects or messages left in proximity likely to be noticed;
- Display of sexually graphic materials;
- Sexually suggestive gestures;
- Whistling; or
- Leering.

Anyone can be a victim of sexual harassment, regardless of her or his sex or the sex of the harasser. 3ie recognises that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the

workplace.

## 4. Principles of safeguarding of beneficiaries

This policy is founded on the following safeguarding principles:

Sexual exploitation, abuse or harassment of beneficiaries benefiting from or impacted by 3ie's work constitutes inappropriate behavior and shall lead to disciplinary action. Our [Code of Conduct](#) sets forth the "expected behaviors and practices constituting the organization's minimum standards and actions to be avoided".

- Safeguards are integrated throughout the employment cycle so that we ensure strong checks are in place at the start of employment and regular training and performance management - reinforced by strong codes of conduct and standards - throughout the employee's tenure with 3ie.
- Reporting and complaints mechanisms are in place for reporting any misconduct that occurs, including by associated individuals. We will investigate all reported misconduct and refer to appropriate statutory regulatory authorities, where required.
- Whistleblowing policy ensures anonymity and safety of those making disclosures. 3ie is committed to providing assistance to whistleblowers who report conduct contrary to this policy, as well as specific assistance and support to victims of sexual exploitation, abuse or harassment perpetrated by a person working with or collaborating with 3ie.
- 3ie recognizes its accountability to beneficiaries and survivors of sexual abuse. When a conflict of interest exists between the victim and the person involved, the well-being and wishes of the victim shall take priority when handling the case, especially where there is a risk of further physical and/or emotional ill-treatment.

## 5. Prohibited conduct

3ie prohibits and does not tolerate any of its employees or associated individuals engaging in sexual exploitation and abuse of beneficiaries. 3ie personnel are prohibited from engaging in romantic or sexual relationships with beneficiaries unless the relationship does not violate the other prohibitions in this policy and the individual concerned first obtains the approval of their line manager, who will only approve after ensuring that the relationship will not jeopardize the community's trust in 3ie and any potential conflicts of interests that it creates are handled properly. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent in the country. Mistaken belief in the age of a child is not a defense.

## 6. Reporting of prohibited conduct

The person who initially became aware of the sexual exploitation, abuse or harassment or has a reasonable suspicion of such an occurrence, must report in accordance with 3ie's Whistleblowing Policy. See: [Whistleblowing Reporting Form](#).

3ie will review all such complaints and will investigate in accordance with the Whistleblowing Policy.

- When reporting an incident or suspicion of an incident, it is important to be specific and provide as much details as possible to assist the investigation process.
- Any concerns or suspicions should be reported in good faith, but no attempts should be made to investigate further in order to obtain proof by the person who is reporting.
- It is prohibited to take sanctions against anyone reporting an incident in accordance with adapted procedures. 3ie will not tolerate any form of retaliation against its employees, beneficiaries or others who report suspected prohibited conduct in good faith or participate in investigations.
- If the person accused is a 3ie employee, they shall be immediately asked to proceed on leave (unpaid) or suspended, until the allegations have been investigated and appropriate measures taken.
- Where necessary, 3ie will ask its partner/s to suspend or remove the suspected individual until the allegations have been investigated and appropriate measures taken. Any proven allegations of such practices shall result in 3ie terminating the partnership agreement unless the partner organisation commits to resolution and effectively ensures a radical change in behaviour.
- Disciplinary measures shall be taken against the employee in accordance with the gravity of the misconduct and applicable provisions, notably 3ie's policies and the law applicable to the contract. For the same reasons, 3ie shall officially request partners organization/s to take appropriate measures with the accused person.
- In the event sexual exploitation or abuse could violate local criminal law, unless the safety and security of the victims are necessitated otherwise, 3ie will report the incident to the local law enforcement agency. If the conduct violates the criminal law of the home country of the accused, 3ie may also notify law enforcement agency in that country.
- 3ie will cooperate fully with any investigation initiated by donors or law enforcement and will seek to ensure that those who engage in criminal sexual activity of any kind are held accountable.
- 3ie will not obstruct local legislation and shall take all necessary steps to ensure fair judicial proceedings where required.
- Any false, malicious complaints or contemptuous statements made against 3ie employees or associated individuals shall be investigated and the appropriate measures taken, including disciplinary measures.

## **7. Confidentiality**

In all matters relating to this policy, the obligation of confidentiality must be respected. Therefore, no information provided by children or other beneficiaries, community members, and/or other individuals about any form of sexual exploitation, abuse or harassment shall be made public without the prior consent of the child / their parents or legal guardian and/ or the person reporting the incident.

Victims / Survivors and whistle-blowers must be kept fully informed at all times of the process underway for handling the incident and of its outcome.

All concerns, allegations or disclosures shall be reported in writing, while being as precise as possible.

Access to reports will be restricted to only those involved in the redressal and resolution process, and information shared strictly on a need-to-know basis. Any transfer of information (either verbal or electronic) shall be done in such a way as to guarantee its confidentiality.

Should the allegation concern staff from another organisation, the Executive Director shall decide how to approach the issue with the organisation concerned before reporting it to a third party, and with due regard to local legislation.

## **8. Responsibilities**

All staff and associated individuals collaborating with 3ie have a duty to ensure compliance to the policy. Specifically, for harassment, sexual exploitation and abuse of beneficiaries, all persons associated with 3ie have a bystanders' responsibility to intervene and/or report predatory sexual behavior.

Those with managerial or leadership responsibilities will have heightened responsibility to cultivate protective and responsive environment and respond quickly and appropriately to issues or occurrences in relation to sexual exploitation and abuse.

Global People team is responsible for ensuring 3ie Code of Conduct and safeguarding policies are of a high standard and compliant with international best practices and undertake review of the policy every two years. They will ensure the recruitment processes are robust and monitor compliance along with the senior management.

## **9. Implementation**

The implementation of this policy is supported by a framework of conduct set out in associated policies and their processes, each of which support the principles, responsibilities and commitments in this policy:

- Code of Conduct
- Anti-Human Trafficking and Anti-Modern Slavery;
- Duty of Care;
- Prevention of Sexual Harassment at workplace;
- Respect at Work;
- Safeguarding; and
- Whistleblowing

3ie is committed to monitoring the efficacy of the policy in creating a workplace free of exploitation and abuse and reviewing the policy every two years.

-----