



# PROTECTION FROM SEXUAL EXPLOITATION, ABUSE AND HARASSMENT POLICY

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## 1. PURPOSE OF THIS POLICY

This policy sets out Mdm Greece's approach to preventing and responding to sexual exploitation, abuse and harassment (*SEAH*). It sets out:

- The principles upon which we will base our decision making and actions;
- Our expectations of everyone who works for and with Mdm Greece;
- Our commitments to ensure effective action is taken when cases occur.

The policy applies to all staff at all times during their service with Mdm Greece. **"Staff"** in this policy refers to Mdm Greece's employees, interns, volunteers, consultants and sub-contractors as well as the staff of all partner organisations working for Mdm Greece's programme (*hereafter called "staff"*). All member organisations commit to implementing this policy and to taking the necessary steps to do so. By means of a contractual clause, they also ensure that their contracting parties comply with the PSEAH minimal standards.

All staff will be familiar with this policy. Changes to this policy will be subject to prior consultations with staff members and member organisations.

This Policy will be used in conjunction with relevant employment/labor law and relevant criminal laws to make decisions about how to respond to any allegations, complaints and concerns received.

## 2. PRINCIPLES

Mdm Greece believes that all people have the right to live their lives free from sexual harassment and abuse, sexual violence, bullying, exploitation and any abuse of power regardless of their age, gender, sexu-

ality, disability, religion or ethnic origin. Mdm Greece will not tolerate its employees, volunteers, consultants, partners' staff or any other representatives associated with the delivery of our work carrying out any form of sexual harassment, abuse or exploitation. Such behaviour goes against the beliefs, values and mission of our association.

Mdm Greece commits to the most widely used standards with regards to PSEAH. Sexual harassment, violence, exploitation and abuse, as well as a range of abuses of power, take various forms and can happen to anyone. Mdm Greece recognises that this can happen in our workplaces and that as an organisation working with vulnerable populations, we have to do anything in our power to protect them as well as our staff.

## 3. DEFINITIONS

### 3.1. SEXUAL EXPLOITATION

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

### 3.2. SEXUAL ABUSE

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

### 3.3. SEXUAL HARASSMENT

"Sexual harassment" describes unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature, from the perspective of the person being harassed. It can be directed towards one person, groups of people or towards everyone and can occur as a one-off inci-

dent or be a pattern of harmful behaviour. The effect of sexual harassment is among others to violate the dignity of another person, and to create an intimidating, hostile, degrading, humiliating or offensive environment for them and others.

Sexual harassment can take many forms, including (*but not limited to*):

- Verbal comments of a sexual nature, such as remarks about an employee's appearance, questions about their sex life or offensive jokes;
- Non-verbal such as displaying pornographic or explicit images, staring, sexual gestures or written comments of a sexual nature;
- Physical such as unwanted physical contact, touching, and assault (*this includes attempts and threats to do these things*).

When addressing allegations of sexual harassment, MdM Greece is concerned with the impact of the behaviours on the complainant. An action or behaviour can still be considered sexual harassment even if the alleged harasser did not intend for it to be harmful. Communication and explanation from both sides are important in this context.

## 4. GUIDELINES

The Policy is underpinned by the six principles outlined below. The principles reflect MdM Greece's commitments to address SEAH.

### **PRINCIPLE 1:**

#### **ZERO TOLERANCE OF INACTION**

Sexual exploitation, abuse and harassment are never acceptable. MdM Greece recognises that achieving a significant reduction in SEAH is a long-term endeavour. Zero tolerance is not the same as zero incidents. Reports of incidents may increase as organisations improve safeguards. Increasing reports may indicate

growing awareness of SEAH and changing attitudes, with victims/survivors feeling more comfortable to report and organisations more likely to take action. The reporting of incidents and responses is an indicator that the risk of SEAH is being managed appropriately.

For this Policy, MdM Greece defines zero tolerance as acting on every allegation in a fair and reasonable way with due regard for procedural fairness.

### **PRINCIPLE 2:**

#### **STRONG LEADERSHIP ACCELERATES CULTURE CHANGE**

Culture change is underway in many organisations. Strong leadership is essential for accelerating the pace of change. Leaders set organisational culture. MdM Greece expects its leaders as well as the leaders of its member organisations to set clear expectations and model respectful behaviour in their interactions at work. This will support communities, victims/survivors and whistleblowers to feel safe, report concerns and be assured their allegations are taken seriously.

Strong leaders address SEAH by taking measures to improve diversity and inclusion. Diverse and inclusive organisations have lower levels of harassment and discrimination. This can include strong, actionable human resource procedures that embed gender equality and PSEAH; inclusion of PSEAH discussions on board meeting agendas; having senior champions responsible for PSEAH and encouraging staff gender balance particularly in senior roles. Leaders should encourage scrutiny of their own behaviour and that of senior management.

### **PRINCIPLE 3:**

#### **VICTIM/SURVIVOR NEEDS ARE PRIORITISED**

Action to address SEAH should be underpinned by a "do no harm" approach prioritising the rights, needs,

and wishes of the victim/survivor, while ensuring procedural fairness to all parties. This approach:

- Treats the victim/survivor with dignity and respect
- Involves the victim/survivor in decision making
- Provides the victim/survivor with comprehensive information
- Protects privacy and confidentiality
- Does not discriminate based on gender, age, race/ethnicity, ability, sexual orientation, or other characteristics
- Considers the need for counselling and health services to assist the victim/survivor with their recovery.

#### **PRINCIPLE 4:**

##### **PREVENTING SEXUAL EXPLOITATION, ABUSE AND HARASSMENT IS A SHARED RESPONSIBILITY**

Preventing Sexual Exploitation, Abuse and Harassment is everyone's responsibility. Real change to reduce SEAH will not occur unless every sector plays a role — government, business, non-government organisations, institutions, communities and individuals. Mdm Greece requires the commitment, support and investment of its partners for this Policy to be effective. All member organisations have a responsibility to build their capacity to deal sensitively and effectively with SEAH that occurs in the course of their work.

#### **PRINCIPLE 5:**

##### **GENDER INEQUALITY AND OTHER POWER IMBALANCES ARE ADDRESSED**

Many power imbalances are at play. Inequalities based on the distinctions of worker/beneficiary; male/female; ability/disability; ethnic and indigenous status; religion; gender identity and sexual orientation; age; health and poverty, can also result in SEAH. The intersection of gender with other forms of inequality can further increase the likelihood of SEAH occurring. Engagement with intended beneficiaries

should be based on respect for diversity, promotion of gender equality and social inclusion, accountability, and a strong "do no harm" focus. Children are at high risk of SEAH — particularly children with disability, children living in residential or institutional care, children who have experienced previous trauma or abuse, trafficked children, and gender diverse children and young people.

#### **PRINCIPLE 6:**

##### **STRONGER REPORTING WILL ENHANCE ACCOUNTABILITY AND TRANSPARENCY**

Sexual exploitation, abuse and harassment are a failure of responsibility. The organisations and individuals who deliver Mdm Greece's business are not only accountable to Mdm Greece, but also to the communities, customers and clients for whom the projects and programs are intended. Stronger reporting allows Mdm Greece and its member organisations to better monitor SEAH, understand risks, improve assurance and work with organisations to improve systems and safeguards accordingly. Reporting will also help to focus organisations on the issue by providing a regular prompt that PSEAH is a core obligation of their work.

## 5. COMPLAINTS PROCEDURES

### 5.1. ENCOURAGEMENT TO REPORT

Creating a safe working environment is everyone's responsibility. Therefore, all member organisations shall install a complaint mechanism, which allows and encourages staff to report any suspicions of sexual exploitation, abuse and harassment of others. The MdM Greece's complaint mechanism can be contacted with complaints.

Abuse may be current, recent or historical. There are no time limitations for reporting and taking action within the remit of this policy, although MdM Greece encourages that reports are made as soon as knowledge, or suspicion, of an act of harassment, exploitation or abuse occurs.

### 5.2. SUPPORT FOR SURVIVORS AND VICTIMS

Support will be offered to survivors and victims. Support can include specialist psycho-social counselling, and/or access to other specialist (e.g. *medical and/or legal aid*) and appropriate support as needed. Survivors and victims have the right to choose if and when they would like to take up the support options available to them.

### 5.3. CONFIDENTIALITY

Confidentiality will be maintained throughout the complaints process by all staff and witnesses. Staff members who breach confidentiality are subject to disciplinary action up to and including termination of employment.

Related to this, as much as possible, MdM Greece and its member organisations will comply with reporting obligations under local law, when we have the victim's consent to do so. However, if someone's life is in danger or the matter relates in any way to a child, then independent decisions may have to be

taken (for example, to contact the police). The decision about whether to refer to local police or statutory authorities in other cases is made by the person who it is alleged has been the subject of abuse (*"the victim/survivor"* – who may or may not be the complainant).

### 5.4. PREVENTION OF RETALIATION AGAINST COMPLAINANTS, VICTIMS AND WITNESSES

MdM Greece, respectively its member organisations, will take action against any staff, volunteers or other representatives, whether they are the subject of a complaint or not, who carry out retaliatory action against complainants, victims or other witnesses. Staff who is found to do this are subject to disciplinary action, up to and including termination of employment.

### 5.5. OUTCOMES OF MISCONDUCT

Staff who is found to contravene MdM Greece's expectations of their sexual and personal conduct will be subject to disciplinary action depending on the case and may result in dismissal and referral to law enforcement. Volunteers, contractors and other representatives may have their relationship with MdM Greece terminated.

### 5.6. FALSE ALLEGATIONS

If a member of staff from MdM Greece or one of its member organisations is found to have made an allegation that they knew to be false they will be subject to disciplinary action, up to and including termination of employment.

## 6. HOW DO I REPORT A PSEAH INCIDENT?

Report the complaint confidentially to the MDM-Greece PSEA Focal Point through an email on [investigation@mdmgreece.gr](mailto:investigation@mdmgreece.gr), as soon as possible and safely – Within 24hours. Through the PSEA Focal Point, the members of the investigation committee should be notified that an allegation has been received in order to proceed for further action. Investigation committee consists of 2 members of the MDM-Greece Board of the Directors and the PSEA Focal Point. Currently the PSEA Focal Point is the Operational Director of the organization.

## 7. POLICY REVIEW

This policy will be reviewed every **2 years** or as necessary. Mdm Greece will review the operation of this policy in consultation with the staff and other stakeholders. Mdm Greece will take into account lessons learned from handling complaints and will take into consideration any received feedback.



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