



Protection from Sexual Exploitation (PSEA) Policy

Health Education and Development Society (HEADS)



Abstract

The PSEA Policy of HEADS reinforces its zero-tolerance approach to sexual exploitation, abuse (SEA), and gender-based violence (GBV). It ensures a safe, respectful environment through clear prevention, reporting, and response measures. The policy applies to all staff and partners, emphasizing mandatory training, ethical recruitment, confidential reporting, survivor-centered investigations, and structured referrals. Ongoing monitoring and leadership oversight ensure accountability and continuous improvement.

This policy has been revised in January 2025 for a period of one year and will be revised in January 2026. However, changes or amendments will be incorporated earlier if required due to any revisions in relevant government policies, global standards, or donor requirements.

ngo.org

www.heads-



Background:

Health, Education and Development Society (HEADS), is a non-profit, non-political and non-governmental organization registered in Pakistan under the Societies Act 1860. Since its establishment in 2013, HEADS has been actively engaged in the developmental and humanitarian sectors. The organization is led by a dedicated Board of Governors (BoG), consisting of professionals with diverse educational backgrounds and capabilities. HEADS operate under a comprehensive set of policies designed to ensure transparency, accountability and efficiency in its systems and operations. HEADS Currently registered in the Islamic Republic of Afghanistan, and established an office in the capital city, Kabul.

Throughout its history, HEADS has worked closely with communities and various stakeholders, addressing a wide range of issues, including but not limited to Education, Health, Protection, Livelihoods, Community Infrastructure (CPIs), Shelter and Settlement, Community Development, Institutional Capacity Building, Research, Gender Equality, Legal Counselling, Referral Mechanisms, Social Accountability, Right to Information, and Governance.

In addition to these programmatic areas, HEADS place a strong emphasis on cross-cutting themes, including social mobilization, gender mainstreaming, inclusion, and resilience in all its core programs. These themes reflect the organization's commitment to addressing the holistic needs of communities and promoting sustainable development.

Vision: Every Individual regardless of background or circumstances enjoy equal opportunities and rights with dignity.

Mission: Empowering Communities through strategic investment in human capital and institutional capacity development, raising sustainable development at the grassroots level.

Objectives:

- Support and develop replicable models and strategies for sustainable human resource development through skills development initiatives.
- Network and collaborate with the Govt. Departments, NGO's, CBO's, WOs and international agencies/donors for sustainable development.
- Support initiatives for sustainable community-based gender sensitive development with particular focus on; Human and institutional Development, Natural Resource Management, Drinking Water Supply, Environmental Sanitation, Education, Agriculture, Health & Nutrition, Disaster Management and Micro Credit & Enterprise.
- Create economic and recreational opportunities for youth through skill enhancement programs for peace promotion.
- Enable equitable access to quality education and healthcare, raising holistic community development and well-being.
- Promoting Social Inclusion and Empowerment;
- Strengthen Resilience to Climate Change and Environmental Degradation.
- Advocacy for Peace, Human Rights, and Social Justice.
- Building Disaster Resilience and Preparedness



Introduction

HEADS is committed to ensuring a safe and respectful environment free from sexual exploitation, abuse (SEA), gender-based violence (GBV), and child abuse. This policy outlines the principles, responsibilities, and mechanisms for preventing, reporting, and responding to SEA cases within HEADS' operations.

Objectives of the Policy

Through this policy HEADS aims to Prevent SEA & GBV by establishing strong safeguards and awareness mechanisms. Ensure equality & non-discrimination by protecting all individuals regardless of gender, ethnicity, disability, or any other status. Create safe reporting & response mechanisms to handle SEA cases with confidentiality and accountability. Enforce zero tolerance by integrating PSEA commitments into all contracts, partnerships, and organizational policies and Monitor compliance & continuous improvement through regular reviews and external audits.

Scope

HEADS upholds a zero-tolerance policy against sexual exploitation and abuse (SEA) to protect beneficiaries, particularly women, children, the elderly, and vulnerable groups. All HEADS employees and related personnel must maintain the highest ethical and professional standards to prevent harm and uphold the integrity of humanitarian assistance. All personnel are expected to be proactive in enforcing this policy, ensuring safe and abuse-free interactions with beneficiaries while maintaining organizational accountability.

This policy applies to:

- ☒ HEADS Board of Directors, Management, and Staff
- ☒ Consultants, volunteers, and service providers
- ☒ Partner organizations, sub-grantees, and subcontractors
- ☒ Suppliers of goods, services, and works
- ☒ Any individual or entity contracted by HEADS

Key Definitions

To ensure clarity and shared understanding, the following key terms are defined within this policy:

- **Sexual Harassment:** Unwelcome sexual advances, requests for sexual favors, or other verbal/non-verbal/physical conduct of a sexual nature.
- **Sexual Exploitation:** Abuse of a position of vulnerability for sexual purposes, including financial or social benefits.
- **Sexual Abuse:** Actual or attempted forced sexual act or unwanted sexual touching, including child abuse.
- **Preventive Harassment:** Proactive measures ensuring a work environment free from harassment, discrimination, or intimidation.
- **Equality & Non-Discrimination:** Ensures protection regardless of age, disability, ethnicity, gender, sexual orientation, religion, or legal status.



Core Principles

HEADS ensures swift reporting, thorough investigations, and appropriate legal action in response to any SEA incident, upholding its commitment to protection and accountability.

- o Zero Tolerance for SEA – Sexual exploitation and abuse (SEA) by HEADS employees and affiliates constitute gross misconduct, leading to disciplinary action or termination under applicable laws.
- o Child Protection – Sexual activity with minors (under 18) is strictly prohibited, regardless of local consent laws. Ignorance of age is not a defense.
- o No Exchange for Sex – Offering money, goods, services, or employment in exchange for sexual favors, including exploiting beneficiaries, is strictly forbidden.
- o Power Imbalance in Relationships – Sexual relationships between HEADS staff and beneficiaries are strongly discouraged, as they compromise integrity and trust in humanitarian work.
- o Mandatory Reporting – Any suspicion or concern regarding SEA, whether involving HEADS personnel, partners, or suppliers, must be immediately reported through official channels. The Supervisory Body must be informed of all allegations, including rumors.
- o Preventive Responsibility – All HEADS staff, regardless of rank, must actively prevent SEA and enforce the Code of Conduct and Ethical Guidelines to create a safe and abuse-free environment.

Prevention

To minimize the risks of SEA and GBV, HEADS implements proactive prevention strategies across all levels of the organization. These measures promote ethical behavior, safe working environments, and accountability to beneficiaries.

- o Strict zero-tolerance policy on SEA across all operations.
- o Awareness campaigns promoting safe and respectful conduct.
- o SEA clauses in all contracts, partnerships, and MOUs.

Vetting & Screening

To ensure that all personnel meet the highest ethical standards, HEADS has developed a rigorous vetting and screening process.

- o Mandatory background checks for all staff and partners.
- o Screening of implementing partners to ensure SEA compliance.
- o Development of a robust recruitment policy preventing SEA risks.

Code of Conduct

HEADS upholds strict confidentiality, survivor-centered response, and whistleblower protections to maintain a safe and accountable environment for all stakeholders. A set of mandatory behavioral standards that all HEADS staff and affiliates must follow.

- o **Beneficiaries of Humanitarian Assistance** – Individuals receiving aid, including refugees, displaced persons, vulnerable individuals, and host communities. SEA occurs when an aid



worker exploits a beneficiary, even if they are not in a vulnerable position; a power imbalance is sufficient.

- **Humanitarian Aid Worker** – Any individual involved in providing protection or assistance under HEADS, including staff, volunteers, contractors, implementing partners, and incentive workers, regardless of contract type or duration.
- **Related Personnel** – Includes HEADS employees, board members, volunteers, interns, consultants, and contractors, as well as partner organizations and their personnel working under HEADS agreements.
- **Complainant** – Any person reporting SEA allegations to the Complaint and Feedback Mechanism (CFM). This could be the survivor or someone aware of the wrongdoing. Both the complainant and survivor must be protected from retaliation, with the survivor's safety and well-being prioritized.
- **Whistleblower** – A humanitarian aid worker who reports SEA allegations involving colleagues. HEADS' whistleblower protection policies ensure confidentiality, non-retaliation, and a clear reporting process, provided the report is made in good faith.

Mandatory Training & Awareness

HEADS recognizes that knowledge and awareness are key to preventing SEA and GBV. The organization mandates continuous learning opportunities to reinforce a culture of compliance and accountability.

- Induction & refresher training on PSEA for all employees.
- Workshops for field staff on identifying and reporting SEA cases.
- Inclusion of SEA education in community engagement programs.

Reporting Mechanism

Ensuring a safe and confidential reporting process is essential for the effective enforcement of the PSEA policy. HEADS provides multiple accessible and secure channels for reporting incidents.

- Establishment of confidential & accessible reporting channels (hotline, email, in-person).
- Anonymous reporting option available for survivors & witnesses.
- Ensuring all reports are handled without fear of retaliation.

Investigation Process

HEADS is committed to ensuring a fair and transparent investigation process to address allegations of SEA. Investigations will be conducted professionally, with survivor-centered approaches.

- Formation of an independent SEA Investigation Committee.
- Defined timeline for case resolution (30-60 Days) ensuring fairness & transparency.
- Coordination with legal authorities & support services for survivors.

Referral Systems

HEADS recognizes the importance of survivor support through structured referral pathways. This policy mandates a coordinated approach to providing immediate and long-term assistance.



HEADS ensures survivors receive timely and appropriate assistance through a structured referral mechanism:

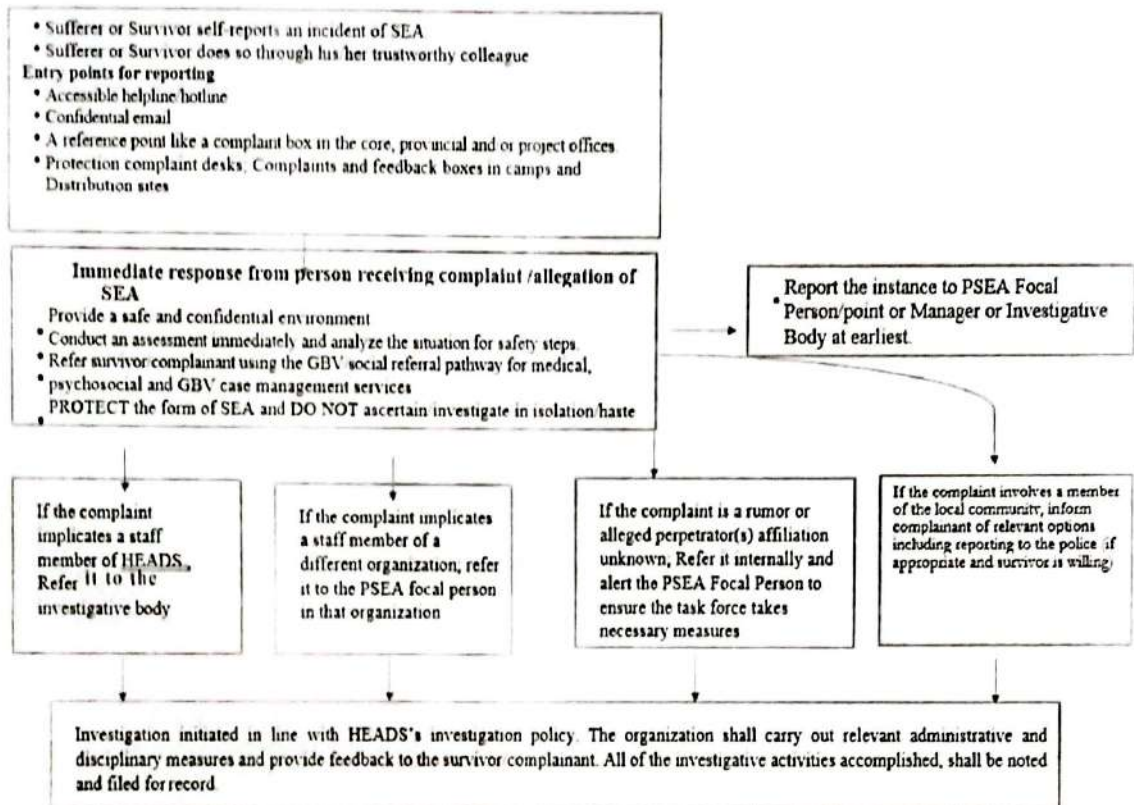
- **Explain the Process** – HR informs the complainant about the referral procedure, with an option for anonymity.
- **Needs Assessment** – Identify the survivor's needs (medical, legal, psychosocial) and provide immediate support.
- **Identify Relevant Service Providers** – Maintain an updated database of external service providers. Partnerships with law enforcement, medical, and psychosocial support services. Ensuring safe case referrals to external protection agencies when required.
- **Contact Service Providers** – Facilitate access to required services in a timely manner.
- **Assistance in Transportation** – Provide safe transport when necessary.
- **Follow-Up Support** – Ensure ongoing monitoring of survivor well-being and service effectiveness.
- **Confidential Documentation & Reporting** – Maintain secure records while protecting survivor privacy.

Service Providers

- **Safety & Protection** – HEADS HR, police, social welfare agencies, shelter homes.
- **Medical Care** – On-site first aid, hospitals, health institutions.
- **Psychosocial Support** – HEADS psychosocial staff, NGOs, trauma counselors.
- **Legal Assistance** – HEADS legal aid, law enforcement.
- **Support for SEA-Affected Children** – EDHI centers, SOS, child protection services.



HEADS's PSEA Reporting Mechanism



Anti-Retaliation & Whistleblower Protection

To ensure confidence in reporting, HEADS has implemented strong anti-retaliation measures.

- Guaranteed protection against retaliation for all individuals reporting SEA.
- Strict penalties for intimidation, threats, or retaliation against whistleblowers.

Monitoring, Compliance & Policy Review

Monitoring & Review Mechanisms

To assess policy effectiveness and ensure compliance, HEADS has established comprehensive monitoring and review mechanisms.

- Annual external & internal audits of SEA cases & compliance.
- Development of a PSEA compliance scorecard for continuous tracking.
- Stakeholder consultations & lessons learned reviews for policy updates.



Management Responsibilities

HEADS leadership plays a crucial role in the successful implementation and enforcement of the PSEA policy. This section outlines the key responsibilities of management personnel.

- Senior leadership commitment to PSEA enforcement & awareness.
- HR department oversight on compliance & reporting mechanisms.
- Field staff & community representatives responsible for local implementation.

Policy Updates & Continuous Improvement

To remain effective, this policy will undergo periodic reviews and updates based on evolving challenges and best practices.

- Policy review every two years to integrate emerging PSEA challenges.
- Alignment with IASC Six Core Principles & international SEA standards.
- Continuous improvements based on lessons learned & case studies.



A handwritten signature in blue ink is located at the bottom right of the page, next to the OCHA logo. The signature is stylized and appears to be a personal name.

BOD Meeting Minutes

Date: January 06, 2025

Participated by:

Raza Ullah Jan	Executive Director
Uzma Amin	Chairperson Board
Samina Khanam	Board Member
Nawaz Ali Shah	Board Member
Amabareen Banori	Board Member
Muhammad Jidran	Board Member
Abid Ali	Board Member
Tahira Nasreen	Board Member
Sayed Ali Shah	Director Program
Asif Ali	Director Finance
Ramsha Khan	HR Officer

Agenda Items:

- Change in Leadership position
- Formation of the Annual Report, Annual Budget, and Strategic Plan.
- Completion of the NDRMF Capacity Improvement Action Plan.
- Processing for Charity Commission in Balochistan and Khyber Pakhtunkhwa.
- Revision of HEADS policies.
- Renewal of Society Act Registration for 2025.

Proceedings & Outcomes:

The meeting commenced with the recitation of the Holy Quran, followed by a formal welcome note delivered by the Chairperson, Ms. Uzma Amin, and the Executive Director, Mr. Raza Ullah Jan. The discussions focused on the agenda items and organizational improvements.

- The Board decided to shift Mr. Raza Ullah Jan from the position of Chairperson of the Board of Directors (BOD) to Executive Director of HEADS, following the resignation of Ms. Samina Khanam from the role of Executive Director. Ms. Khanam has now joined the Board as a Board Member. Additionally, Dr. Uzma Amin has been appointed as Chairperson of the Board, effective immediately.
- The Board emphasized the importance of preparing Annual Report/ Annual Budget and Strategic Plan to assess the organization's current standing and plan strategically for the upcoming year.
- As HEADS has been conditionally accredited by the National Disaster Risk Management Fund (NDRMF) for six months, the Board reviewed the shared Capacity Improvement Action Plan. It was decided to prioritize its completion within the stipulated timeframe, recognizing this as a crucial opportunity for the organization.

- The Board agreed to initiate the process for Charity Commission registration in Balochistan. Police verification for the Charity Commission in Khyber Pakhtunkhwa will be expedited to obtain the certification promptly.
- A comprehensive review of organizational policies was conducted. The Board proposed and approved necessary amendments to align with current needs and best practices.
- It was noted that the Society Act Registration expired in December 2024. The Board resolved to apply for its renewal for 2025 without delay.

The meeting concluded with a thorough review of the agenda items, ensuring they aligned with the organization's strategic objectives. The Board expressed optimism about the successful execution of the discussed initiatives. The Chairperson concluded the meeting with a vote of thanks.

Signed on this Monday January 06, 2025 by authorized signatory.



Dr. Uzma Amin
Chairperson Board



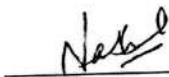
Mr. Raza Ullah Jan
Executive Director



Ms. Samina Khanam
BOG Member



Mr. Muhammad Jidran
BOG Member



Mr. Nawaz Ali Shah
BOG Member



Miss. Ambareen Banori
BOG Member



Mr. Abid Ali
BOG Member



Miss. Tahira Nasreen
BOG Member



Mr. Sayed Ali Shah
Program Director HEADS



Mr. Asif Ali
Director Operations HEADS



Miss. Ramsha Khan
HR Officer



Policy Review & Update Record

A Board meeting was held on January 6, 2025, with the key agenda of reviewing and updating all organizational policies of HEADS. The Board advised the management to undertake a comprehensive policy review to ensure relevance, compliance, and alignment with organizational goals and evolving operational needs.

In line with this directive, all organizational policies were reviewed and amended on January 31, 2025, under the leadership of the Executive Director and with the involvement of the Finance & Audit Committee and relevant departments.

The review process included:

- A thorough evaluation of existing policies.
- Revisions based on internal assessments, audit findings, regulatory requirements, and best practices.
- Incorporation of feedback from staff and stakeholders.
- Updates to enhance clarity, accountability, and operational effectiveness.

Means of Verification:

Revised policy documents, review reports, and documented feedback and approval records.



(H E A D S)

Raza Ullah Jan
Executive Director