

# Protection from Sexual Exploitation and Abuse (PSEA)

## Whistle-Blower Protection Policy

Version:01- January 2025



**Health Education and Development Society (HEADS)**

 [www.heads-ngo.org](http://www.heads-ngo.org)

 [info@heads-ngo.org](mailto:info@heads-ngo.org)

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[Email address]



## **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 is currently registered in the Islamic Republic of Afghanistan, and has 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 places 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, enjoys 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.

## **1. Purpose**

The purpose of this Whistle-Blower Protection Policy is to provide a safe, confidential, and effective mechanism for reporting Sexual Exploitation and Abuse (SEA), misconduct, corruption, harassment, abuse of authority, and violations of organizational policies. The policy aims to ensure that whistle-blowers are protected and reports are addressed responsibly.

## **2. Scope**

This policy applies to:

- All HEADS employees (fulltime, part-time, contract, temporary)
- Volunteers, interns, consultants
- Implementing partners, suppliers, and contractors
- Beneficiaries and community members interacting with HEADS programs



### 3. Policy Principles

- Zero tolerance for SEA and retaliation.
- Confidentiality of all reports.
- Fair and impartial investigation.
- Protection of whistle-blowers from any form of reprisal.
- Accountability and transparency in all reporting and response processes.

### 4. Definitions

- Whistle-Blower: Any person who reports SEA, misconduct, or policy violations in good faith.
- Retaliation: Any adverse action, threat, harassment, discrimination, termination, or intimidation against a whistle-blower.
- Sexual Exploitation and Abuse (SEA): Any actual or attempted abuse of a position of vulnerability for sexual purposes.

### 5. Reporting Channels

HEADS provides multiple safe reporting mechanisms:

- Email: For complaint registration and correspondence
- Phone: Dedicated complaint registration and response numbers
- In-person: Reporting to designated PSEA focal persons

This will ensure that these reporting channels are widely accessible and available within the communities.

### 6. Confidentiality

All reports will be treated with the highest level of confidentiality. Information will only be shared on a strict need-to-know basis.

### 7. Protection Measures for Whistle-Blowers

HEADS guarantees:

- No retaliation of any kind
- Protection of identity
- Protection from suspension, dismissal, demotion, threats, or harassment
- Support services if needed (legal, psychosocial, relocation)

### 8. Investigation Process

- Acknowledgement of report within 72 hours
- Initial assessment and risk analysis
- Formal investigation by an independent committee
- Evidence reviews, interviews, and documentation
- Decision and recommended actions
- Implementation of corrective measures

### 9. False Allegations

Deliberate false reporting is considered misconduct; however, reports made in good faith even if unproven will not result in disciplinary action.



A handwritten signature in black ink is located in the bottom right corner, next to the HEADS logo. The signature is stylized and appears to be 'W. J. ...'.

### **10. Roles and Responsibilities**

The Board of Governors holds overall oversight and accountability for PSEA compliance. Senior management is responsible for ensuring effective implementation of the policy across the organization. The PSEA Focal Person is tasked with receiving, documenting, and escalating complaints, as well as coordinating investigations. All employees and partners are required to adhere to the policy and report any violations promptly and responsibly.

### **11. Awareness and Training**

HEADS will conduct regular PSEA training for all staff and partners to ensure understanding of policies and standards. Awareness sessions will also be organized for community members, along with the distribution of reporting information and materials, so that everyone knows how and where to report concerns safely and confidentially.

### **12. Policy Review**

This policy will be reviewed every two years or when necessary due to changes in organizational structure or legal requirements.

### **13. Enforcement**

Failure to comply with this policy may result in:

- Disciplinary action
- Termination of employment
- Legal consequences



## BOG Meeting Minutes

Date: January 06, 2025

Participated by:

Raza Ullah Jan	Executive Director
Samina Khanam	Chairperson Board
Uzma Amin	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 Operations
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 Baluchistan 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. Samina Khanam, and the Executive Director, Mr. Raza Ullah Jan. The discussions focused on the agenda items and organizational improvements.

- The Board decided that Mr. Raza Ullah Jan has been shifted from the position of Chairperson of the Board of Directors (BOD) to Executive Director of HEADS. This follows the resignation of Ms. Samina Khanam from the role of Executive Director and been appointed as Chairperson of the Board of Directors, 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.

# Health Education and Development Society (HEADS)




- 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.

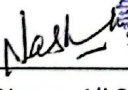
Signed on this Monday January 06, 2025 by authorized signatory.

  
Mr. Raza Ullah Jan  
Executive Director

  
Ms. Samina Khanam  
Chairperson BOG

  
Ms. Uzma Amin  
BOG Member

  
Mr. Muhammad Jidran  
BOG Member

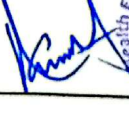
  
Mr. Nawaz Ali Shah  
BOG Member

  
Ms. Ambareen Banori  
BOG Member

  
Mr. Abid Ali  
BOG Member

  
Ms. Tahira Nasreen  
BOG Member

  
Mr. Sayed Ali Shah  
Program Director HEADS

  
Mr. Asif Ali  
Director Operations HEADS

  
Miss. Ramsha Khan  
HR Officer

Address: House 219, Street,1, Sector F/9, Phase-6, Hayatabad, Peshawar, KP  
Email:info@heads.org.pk / website: www.heads-ngo.org Ph:091-5861889

## 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