



**Afghanistan Educational & Health Development Aids Organization**

**AEHDA**

## **PSEA Policy**

**Protection from Sexual Exploitation and Abuse Policy**

**Approved by: Chair of BoDs 10<sup>Th</sup> August, 2024**

Document History						
S.N	Description	Department/Org	Team/Person	Date		Remarks/ Sealed
1	Policy Revision By	ECA	Advisory	1 <sup>st</sup>	August	
2	Reviewed by	AWEC	Technical Team	8 <sup>th</sup>	August	
3	Approved by	AEHDA	BoDs	10 <sup>th</sup>	August	
4	Policy & Version	PSEA Policy AEHDA Afghanistan (V.1)				
5	Policy Revision/ Updated By	ECA/ AWEC	Advisory	1 <sup>st</sup>	August	N/A

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## 1. Introduction

### 1.1. About AEHDA

The Afghanistan Educational and Health Development Aids Organization (AEHDA) is a nonprofit, non-political, non-sectarian, and non-governmental humanitarian women lead organization. Originally established as an association in July 2003, AEHDA underwent additional registration with the Ministry of Economy (MoE) at the end of 2020, officially becoming an NGO with registration number 5085. AEHDA's mission spans education, a One Health Approach, healthcare, public nutrition, water, sanitation, hygiene, food security, advocacy and communication, training, capacity building, as well as research and development.

AEHDA was established by a group of committed, dedicated and professional volunteers to offer result-oriented services to rural, urban slums and urban areas of Afghanistan. AEHDA's services will be delivered through utilization of easy adaptable, contextual, accessible and participatory community empowerment strategies in accordance with the key principles of result-based management (RBM) approaches, and in line with Afghanistan national development priorities and national strategic plans. On the other hand, considering the professional/technical capacities in provision of primary education and public health services, AEHDA is one of the pioneer local NGO that provides contemporary, affordable and quality educational and public health services to Afghan population.

#### **Vision:**

AEHDA envisions empowering Afghan women, youth, children, and vulnerable groups through equitable access to quality education, healthcare, well-being, sustainable livelihoods, and essential services, fostering a prosperous and resilient Afghanistan.

#### **Mission :**

AEHDA is committed to empowering Afghan women, youth, children, and vulnerable groups by providing accessible, quality, and sustainable education, healthcare, mental health and psychosocial support, livelihood opportunities, and essential services. We strive to foster community resilience, social cohesion, and economic growth, ultimately contributing to a prosperous and self-reliant Afghanistan

### 1.2. Purpose of the PSEA Policy

AEHDA maintains a strict zero-tolerance stance towards sexual exploitation and abuse (PSEA). We are committed to ensuring that our staff, associates, partners, and any representatives involved in our work do not engage in any form of sexual exploitation or abuse. This policy is particularly focused on safeguarding vulnerable individuals, including adults, women, and children, who are at heightened risk.

The purpose of this policy is to provide clear guidance on maintaining a safe environment for all communities we serve. It delineates the roles and responsibilities of all AEHDA staff, associates, and partners in preventing and addressing sexual exploitation and abuse. The policy includes specific definitions of prohibited behaviors and outlines the procedures for reporting and investigating any incidents. By adhering to these guidelines, AEHDA aims to uphold the highest standards of protection and integrity in our operations.

### **1.3. Accountability Statement**

AEHDA is firmly committed to enforcing this policy and maintaining a zero-tolerance stance on any form of sexual exploitation and abuse. This PSEA policy applies to all AEHDA staff, associates, and partners, who are required to adhere to its provisions and understand the consequences of any breaches. AEHDA may, where necessary, enhance these standards in line with legal or local requirements. Compliance with this policy and the Code of Conduct will be confirmed through formal acknowledgment. Mandatory training on this policy is required for all AEHDA staff, associates, and partners. The Board of AEHDA holds ultimate responsibility for the implementation and enforcement of this policy. It is incumbent upon all representatives of AEHDA to report any concerns regarding sexual exploitation and abuse. AEHDA takes all concerns and complaints seriously and will initiate a comprehensive investigation into any violations of this policy, with disciplinary and potentially legal actions taken as appropriate.

### **1.4. Framework Principles**

#### **Safeguarding**

AEHDA is dedicated to protecting all community members from sexual exploitation and abuse, regardless of ability, ethnicity, faith, gender, sexuality, or culture. We uphold the principle that all safeguarding processes should be survivor-led whenever possible and appropriate, ensuring that survivors are central to the complaint process.

#### **Shared Responsibility**

Effective implementation and improvement of PSEA policies require collective responsibility from everyone at AEHDA. A lapse in adherence at any level reflects a failure across the organization. Each individual is accountable for contributing to a safe and supportive environment.

#### **Effective Communication**

AEHDA is committed to clear and accessible communication with all staff, associates, and partners. We strive to foster a positive culture where PSEA responsibilities are well-understood and effectively communicated in straightforward language.

#### **Continuous Improvement**

We emphasize ongoing assessment and feedback to enhance our policies and practices. This includes quarterly incident reviews, regular safeguarding audits, and periodic policy updates and refresher training to address emerging needs and lessons learned.

#### **Dignity and Respect**

AEHDA promotes a work environment where dignity and respect are paramount. We uphold a non-judgmental approach when addressing the concerns and complaints of survivors, ensuring that all individuals are treated with empathy and respect.

#### **Zero Tolerance**

AEHDA enforces a strict zero-tolerance policy towards any form of sexual exploitation and abuse. Any breach will be met with decisive action to maintain the highest standards of safeguarding.

### **Confidentiality**

We are committed to maintaining confidentiality in all safeguarding matters. Information will only be shared outside the Safeguarding Committee when absolutely necessary to ensure the safety of the individuals involved.

## **2. PSEA Reporting Structure for AEHDA**

### **2.1. Reporting Channels**

**Executive Director:** Oversees overall PSEA enforcement. Reports of serious allegations should be directed to the Executive Director, who will coordinate investigations and necessary actions.

**HR Head:** Handles PSEA training and confidential staff-related concerns. Reports about staff or associate issues should be directed to HR.

**Procurement Head:** Ensures compliance with PSEA in procurement activities. Concerns involving suppliers or procurement processes should be reported to the Procurement Head.

**Finance Head:** Oversees financial transactions and compliance with PSEA. Financial concerns or misuse should be reported to the Finance Head.

### **2.2. Reporting Process**

- a. **Hotline:** For immediate and confidential reporting, use the PSEA Hotline (Section 6)
- b. **Initial Report:** Reports can be made via the hotline, directly to the relevant Head, or escalated to the Executive Director if necessary.
- c. **Investigation:** The HR Head will coordinate investigations, with oversight from the Executive Director.
- d. **Action:** Based on the investigation, appropriate actions will be taken and implemented.
- e. **Follow-Up:** The Executive Director will ensure actions are effective and provide updates as needed.
- f. **Review:** Post-investigation, the policy and procedures will be reviewed for improvements.

This streamlined process ensures that all concerns are addressed promptly and effectively, reinforcing AEHDA's commitment to preventing and addressing sexual exploitation and abuse.

## **3. Policy Implementation**

This policy is designed to guide AEHDA staff through understanding sexual exploitation and abuse definitions, governance, and responsibilities. It includes procedures and resources for reporting complaints, the format for reporting, and the management of these complaints.

### **3.1. Governance**

The Executive Director of AEHDA, together with the Management Team, holds ultimate responsibility for the PSEA policy and framework. They will receive summaries of reported

incidents and follow-up actions during Executive Team meetings and Board meetings to ensure systematic management and oversight.

### **3.2. AEHDA's Obligations**

AEHDA is committed to ensuring that no individual experiences sexual exploitation and abuse and will not tolerate such behavior from staff, associates, or partners. To uphold this commitment, AEHDA will:

- Foster a safe culture for both beneficiaries and staff.
- Address complaints and concerns promptly through the Safeguarding Committee, taking each complaint seriously.
- Educate staff, associates, and partners on how to file complaints.
- Maintain a zero-tolerance stance towards sexual exploitation and abuse.
- Build a culture of dignity, respect, and empowerment to encourage reporting.
- Inform staff that sexual exploitation and abuse are grounds for termination and potential legal action.
- Provide clear information on reporting complaints and investigation procedures.
- Ensure that all relevant parties have access to the PSEA policy and related safeguarding documents.

### **3.3. Staff Responsibility**

All staff, associates, and partners must adhere to this policy and report any suspicions of sexual exploitation and abuse. They are required to sign the Code of Conduct and acknowledge that they have read and understood the policy.

### **3.4. Manager Responsibility**

Managers and Directors are accountable for implementing this policy. They must support and develop systems that ensure all involved parties understand appropriate behavior, how to raise concerns, and the actions taken in response.

### **3.5. PSEA/GBV Focal Point**

The designated PSEA/GBV Focal Point is responsible for:

- Monitoring and recording PSEA concerns.
- Ensuring timely referrals to relevant authorities.
- Updating PSEA training for all staff.
- Reviewing and updating the policy annually if necessary.
- Implementing the policy throughout the organization and providing PSEA and GBV training.
- Ensuring proper monitoring and recording procedures.

### **3.6. Executive Board**

The Executive Board ensures the effective implementation of the policy and associated procedures, and that all individuals linked with AEHDA are supported and equipped to fulfill their responsibilities.

### 3.7. Confidentiality of Complaints

AEHDA is committed to protecting the confidentiality of sexual exploitation and abuse allegations to preserve investigation integrity and protect individuals from further harm or retaliation. Information obtained during investigations will not be disclosed except as legally required. Concerns regarding confidentiality will be addressed sensitively, and records will be kept confidential. Information will only be shared on a need-to-know basis.

## 4. PSEA Description and Commitments

At AEHDA, all staff, associates, and partners are required to adhere to the PSEA (Protection from Sexual Exploitation and Abuse) policy. This policy is designed to ensure that everyone involved in AEHDA’s operations conducts themselves in a manner that protects beneficiaries and maintains the highest standards of ethical behavior. Below are the core commitments related to sexual exploitation and abuse that must be followed:

The following behavior are considered sexual misconduct and are strictly prohibited:

	Sexual exploitation (SE)	Sexual Abuse (SA)	Sexual Harassment (SH)
Who?	- Us + Beneficiary	- Us + Beneficiary	- Us + Us
What?	-Abuse of vulnerability, Differential power, or trust  -victim’ sexual activity generates benefits	-physical intrusion of a sexual nature  -Use of force or coercion	-Unwelcome advance or conduct of sexual nature  -Creates an intimidating environment or becomes a condition of employment
Example?	- Offering money, gifts, or a job in exchange for sex.  - Withholding due services or blackmailing for sex.  - Hiring prostitutes.  - Threats of sexual exploitation	-Unwanted kissing, touching, grabbing or rubbing.  -Threats of an unwanted sexual Act.  -Raping or attempted rape. - Any Sexual activity with a child.	-Touching, kissing or speaking inappropriately to a colleague at work.  -Attempted or actual sexual assault.  -Raping or attempted rape.

**Sexual Activity with Children and Vulnerable Adults:** Engaging in any sexual activity with children (persons under 18) or vulnerable adults is strictly prohibited, regardless of local age of consent laws. A mistaken belief about the age of the child does not constitute a defense.

**Child Marriage:** Child marriage, defined as marriage to anyone under 18, is prohibited. Any staff, associate, or partner involved in such practices is in violation of the PSEA policy, as individuals under 18 cannot legally consent to marriage.



**Sexual Activity with AEHDA Beneficiaries:** Sexual activity with any beneficiary of AEHDA is prohibited due to inherent power imbalances. A beneficiary is defined as anyone receiving services or support from AEHDA or its partners.

**Sexual Harassment:** Sexual harassment, including unwelcome advances or requests for sexual favors, is prohibited.

**Sexual Violence:** Any acts of sexual violence, including intercourse, sexual touching, and threats, are strictly forbidden.

**Physical/Emotional Abuse:** Physical and emotional abuse, as detailed in the Safeguarding Policy, is prohibited. This list may be updated, and any changes will be communicated by the Safeguarding Committee. Additional details can be found in the Safeguarding Policy.

**Consequences:** Violations of the PSEA policy will result in disciplinary action, which may include termination of employment or contract and/or referral to law enforcement authorities.

#### **4.1. Communication and Training**

AEHDA is committed to ensuring that all staff, associates, and partners are aware of and comply with the PSEA policy. This includes:

1. Providing targeted training for staff with specific responsibilities related to the policy and complaint handling.
2. Offering awareness-raising training for all staff, associates, and partners to ensure they understand how to report concerns.
3. Proactively communicating the zero-tolerance message.
4. Ensuring all staff are trained in the policy, including its definitions and reporting procedures.

#### **4.2. PSEA Reporting Procedures**

Detailed procedures for reporting incidents of sexual exploitation and abuse are outlined in the associated procedures document.

#### **4.3. Failure to Report**

The Code of Conduct mandates that all staff, associates, and partners report any PSEA concerns. Failure to do so may lead to disciplinary action.

#### **4.4. Support for Survivors**

Survivors will receive support regardless of the outcome of investigations, which may include specialist psychosocial counseling and access to other necessary support services.

### **5. Background Checks**

At AEHDA, ensuring the safety and integrity of our operations is paramount. To uphold our commitment to preventing sexual exploitation and abuse, AEHDA implements rigorous background checks for all partners, subcontractors, and employees. This section outlines the procedures and commitments associated with these background checks.

### 5.1. Employee Background Checks

Background checks are conducted on all potential employees before hiring. This includes verification of past employment, educational qualifications, and criminal record checks.

#### Process:

- Candidates will be required to provide relevant documentation and consent to background checks.
- Checks are conducted in accordance with applicable laws and regulations, ensuring that any findings are relevant to the role and the safety of the community.

#### Frequency:

- Initial checks are performed before hiring, with periodic reviews for ongoing employees as deemed necessary, especially when employees are promoted or assigned to new roles.

### 5.2. Partner and Subcontractor Background Checks

Background checks are mandatory for all partners and subcontractors to ensure they meet AEHDA's safeguarding standards.

#### Process:

- Partners and subcontractors must provide documentation and consent to background checks.
- AEHDA evaluates their policies and past performance, including any previous allegations or breaches related to sexual exploitation and abuse.

#### Evaluation:

- Assessments are based on the partner's or subcontractor's history, including legal compliance and adherence to safeguarding practices.
- Only partners and subcontractors who meet AEHDA's stringent criteria will be engaged.

### 5.3. Monitoring and Compliance

Regular monitoring and compliance checks are conducted to ensure that all parties continue to adhere to safeguarding standards throughout the duration of their engagement with AEHDA.

- Any issues or concerns identified during background checks will be addressed promptly. This includes taking necessary actions if any risks or violations are found.

- Records of background checks will be securely maintained to ensure transparency and accountability. Access to this information will be restricted to authorized personnel only.

#### 5.4. Confidentiality and Data Protection

All background check information will be handled with the utmost confidentiality to protect the privacy of individuals involved.

##### Data Protection:

- AEHDA complies with data protection regulations to ensure that personal data collected during background checks is stored securely and used only for its intended purpose.

By implementing these background check procedures, AEHDA reinforces its commitment to safeguarding and maintaining a safe environment for all stakeholders.

#### 5.5. Whistleblowing

AEHDA is committed to a transparent and supportive environment for reporting concerns related to sexual exploitation and abuse (PSEA). Our whistleblowing policy ensures that all staff, associates, partners, and subcontractors can report issues confidentially and without fear of retaliation. Reports can be made via a confidential hotline, dedicated email address, or in person to designated PSEA focal points. We guarantee the protection of whistleblowers' identities and strictly prohibit retaliation against those who report in good faith. Each report will be acknowledged and investigated impartially, with appropriate actions taken based on the findings. Support, including counseling services, will be provided throughout the process, and all records will be securely maintained and reviewed regularly to uphold the effectiveness of the policy.

### 6. How to Raise a Formal Complaint or Report an Incident?

All staff and representatives who become aware of possible violations of this policy by AEHDA staff must report alleged prohibited conduct immediately through one of AEHDA's reporting channels:

- AEHDA PSEA Focal Point: Executive Director
- AEHDA's complaint mechanism email address & Phone number:  
[complaints@aehta.org](mailto:complaints@aehta.org)

Phone: +93 700273080

AEHDA Org is committed to a transparent and supportive environment for reporting concerns related to sexual exploitation and abuse (PSEA). Our whistleblowing policy ensures that all staff, associates, partners, and subcontractors can report issues confidentially and without fear of retaliation. Reports can be made via a confidential hotline, dedicated email address, or in person to designated PSEA focal points. We guarantee the protection of whistleblowers' identities and strictly prohibit retaliation against those who report in good faith. Each report will be acknowledged and investigated impartially, with appropriate actions taken based on the findings. Support, including counseling services, will be provided throughout the process, and all records will be securely maintained and reviewed regularly to uphold the effectiveness of the policy.

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## REFERENCE CHECK TEMPLATE

Date:	
Applicant Name	
Position Applied for:	
Referee's Name:	
Referee's Title	
Reference check conducted by:	

NO.	General questions	
1	How Long have you known the Candidate and in what capacity, Supervisor, Colleague etc.?	
2	What were the dates of Candidate's employment?	From                      To
3	What was the job title of the Candidate with your organization?	
4	What is/was the Candidate's reason for leaving?	
5	How was Candidate's attendance? Is Candidate punctual to work?	<input type="checkbox"/> Yes <input type="checkbox"/> No
6	Is the Candidate a dependable person?	<input type="checkbox"/> Yes <input type="checkbox"/> No
7	How did the candidate get along with others?	
8	How would you describe the candidate's overall work performance?	
9	What would you say are the candidate's strengths?	
10	What would you say are the candidate's development areas (e.g., Weaknesses)?	

11	What was the level of contact of the Candidate with children while working with you and was there a time that he/she ignored or violated child protection policy?	
12	AEHDA the Candidate ever been subject to disciplinary actions or investigations related to sexual exploitation and abuse while working with you?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes so please provide details:
13	AEHDA the Candidate ever been involved in any form of misconduct, fraud, corruption, money laundering, or other unethical activities in their professional capacity?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes so please provide details:
14	AEHDA the Candidate violated organization other policies while working with you?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes so please provide details:

In closing

Would you re-employ the applicant? Why/why not?	
Do you have any final comments?	
<b>Thank you for taking the time to provide feedback.</b>	

I confirm that the details I have provided are accurate to best of my knowledge.

Sign: _____  Date: _____	Please affix employer's official stamp in space below:
--------------------------------	--

*Appendix B*

<b>SELF-DECLARATION FORM: MISCONDUCT DISCLOSURE</b>			
<b>Applicant</b> <input type="checkbox"/>	<b>Employee</b> <input type="checkbox"/>	<b>Unescorted Contractor/Volunteer</b> <input type="checkbox"/>	<b>Promotion</b> <input type="checkbox"/>

I affirm that all information provided in this form is accurate, complete, and in good faith to the best of my knowledge. I understand that providing false or fraudulent information may result in disqualification from consideration for employment and, if employed, may lead to termination if discovered later.

**1. Sexual Abuse in Institutions:**

Have you ever engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution? **Yes**  **No**

**2. Criminal Conviction for Sexual Activity:**

Have you ever been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? **Yes**  **No**

**3. Civil or Administrative Adjudication for Sexual Misconduct:**

Have you ever been civilly or administratively adjudicated to have engaged in sexual activity, sexual abuse, or sexual harassment? **Yes**  **No**

**4. Misconduct, Fraud, Corruption, Money Laundering, etc.:**

Have you ever been involved in any form of misconduct, fraud, corruption, money laundering, or other unethical activities? **Yes**  **No**

By signing below, I acknowledge my ongoing duty to disclose any changes in the information provided. I understand that any material omissions or provision of false information regarding such misconduct may be grounds for termination.

Full Printed Name: \_\_\_\_\_

Signature: \_\_\_\_\_



Date: \_\_\_\_\_

***Appendix C***

## **ACKNOWLEDGMENT OF PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE (PSEA) POLICY**

I, \_\_\_\_\_, employed by Afghanistan Educational & Health Development Aids Organization (AEHDA), hereby acknowledge that I have received, read, and understand AEHDA's Protection from Sexual Exploitation and Abuse (PSEA) Policy.

By signing this acknowledgment, I confirm my commitment to abide by the principles outlined in the PSEA Policy, including but not limited to:

- Recognizing and reporting any instances of sexual exploitation and abuse.
- Adhering to AEHDA's standards and procedures for preventing and responding to sexual exploitation and abuse.
- Cooperating fully with any investigations related to allegations of sexual exploitation and abuse.
- Contributing to the creation of a safe and respectful environment for all individuals involved in AEHDA's programs.

I understand that any violation of the PSEA Policy may result in disciplinary action, including termination of employment.

Employee/Staff Full Name: \_\_\_\_\_

Position/Title: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Witness (AEHDA Representative): \_\_\_\_\_

Date: \_\_\_\_\_

***Revised by: Policy Review Committee/ECA-AWEC-AEHDA***

***Reviewed and Approved by: Board of Directors***