POLICY 03

Protection from Sexual Exploitation, Abuse and Harassment

Zero tolerance, survivor-centred response, and the duty on everyone to report

Policy owner	CHIEF OPERATIONS OFFICER	**Approved by**	Board of Trustees
Version	1.0	**Date adopted**	05/08/2026
Applies to	All trustees, staff, volunteers, interns, consultants, contractors, ambassadors and partner personnel		
Read with	Safeguarding Policy; Code of Conduct; Whistleblowing provisions of the Anti-Fraud Policy		

1. Statement

1.1 Synia Aid Foundation has **zero tolerance** of sexual exploitation, sexual abuse and sexual harassment. This applies without exception to everyone acting in our name, at all times.

1.2 We recognise that the imbalance of power between those who deliver assistance and those who receive it creates the conditions in which exploitation occurs. Preventing it is our responsibility, not that of the people we serve.

2. Definitions

2.1 **Sexual exploitation** is any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting financially, socially or politically from the sexual exploitation of another.

2.2 **Sexual abuse** is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

2.3 **Sexual harassment** is any unwelcome conduct of a sexual nature that might reasonably be expected to cause offence, humiliation or distress, whether directed at a colleague or at any person we serve.

2.4 **Survivor** means a person who has experienced any of the above. The term is used in preference to "victim" throughout.

3. Our core principles

The Foundation adopts the six core principles on protection from sexual exploitation and abuse established by the Inter-Agency Standing Committee:

3.1 Sexual exploitation and abuse constitute acts of serious misconduct and are grounds for dismissal.

3.2 Sexual activity with any person under the age of eighteen is prohibited, regardless of the local age of majority or consent. **Mistaken belief about a child's age is not a defence.**

3.3 The exchange of money, employment, goods, services or assistance for sex — including sexual favours or any other form of humiliating, degrading or exploitative behaviour — is prohibited.

3.4 Sexual relationships between our personnel and the people we serve are prohibited, because they are based on inherently unequal power and undermine the credibility and integrity of our work.

3.5 Where a member of our personnel develops a concern or suspicion regarding sexual exploitation or abuse by a colleague, whether in this Foundation or not, they **must** report it through the routes at Section 5.

3.6 Everyone associated with the Foundation is required to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of this policy. Managers and Trustees carry particular responsibility for supporting systems that sustain it.

4. Prevention

4.1 **Recruitment.** All personnel are vetted before engagement, with references taken up and any history of misconduct checked. We will not knowingly engage anyone previously found to have committed sexual exploitation, abuse or harassment.

4.2 **Training.** Everyone receives PSEAH briefing at induction and at least annually thereafter, covering what the prohibited conduct is, how to report, and what protection they have.

4.3 **Community awareness.** Every community in which we work is informed, in plain language, that our assistance is free, that nothing may ever be demanded in return, and how to report anyone who breaches that.

4.4 **Programme design.** Distribution, selection and assessment are designed to reduce isolation and unsupervised contact, and no individual both selects a person for support and controls the benefit they receive.

4.5 **Partners.** Every partner is bound by this policy or an equivalent standard as a written condition of partnership, and must inform us of any allegation involving their personnel on our joint work.

5. Reporting

5.1 Any concern, suspicion or allegation must be reported **immediately** and in any event within twenty-four hours to the Safeguarding Focal Point at

SAFEGUARDING@SYNIAFOUNDATION.ORG

5.2 Where the concern involves the Focal Point, the Founder-Chair or the Chief Operations Officer, it is reported to the nominated independent Trustee at NASBELLA@GMAIL.COM .

5.3 Reports may be made by any means — in person, by telephone, in writing, or through any member of staff or volunteer — and may be made anonymously.

5.4 A survivor may report directly, or a report may be made on their behalf. **The Foundation does not require a survivor to report in order to act on a concern**, but will not take steps that override their wishes except where a child is at risk or the law requires it.

5.5 Failure to report a concern is itself a breach of this policy and of the Code of Conduct.

6. Response

6.1 **The survivor comes first.** Immediate priority is their safety, health and dignity. Referral to medical, psychosocial, protection or legal services is offered promptly, with their informed agreement.

6.2 Assistance to a survivor is **not conditional** on their making a formal report, on the outcome of any investigation, or on the identity of the person complained of.

6.3 Confidentiality is maintained strictly. Information is shared only with those who must know in order to protect the survivor or to conduct the investigation.

6.4 The person complained of is suspended from all contact with the people we serve pending the outcome, as a neutral protective measure.

6.5 Investigation is prompt, fair, and conducted by someone with no involvement in the matter. Where the Foundation lacks the capacity to investigate safely, it will commission external support.

6.6 Substantiated conduct results in dismissal or termination, and referral to the Nigeria Police Force or other competent authority where a criminal offence may have occurred, subject to the safety and wishes of the survivor.

6.7 The Board is notified of every allegation within seventy-two hours, and receives a summary of all matters at each meeting.

PROTECTION FOR THE PERSON WHO REPORTS

- No person who reports in good faith will be disadvantaged in any way — in employment, in volunteering, or in the support they receive from the Foundation.
- Retaliation against anyone who reports, or who assists an investigation, is a serious disciplinary matter in itself.
- A report that is not upheld is not a false report. Only deliberately false allegations are a disciplinary matter.

7. Monitoring

7.1 The Focal Point maintains a confidential record of all allegations, actions and outcomes, held separately from personnel files.

7.2 The Board reviews this policy annually and after any substantiated case, and reports to funders as required by their own PSEAH conditions.