

CENTRE FOR ENVIRONMENT AND MIGRATION ASSISTANCE (CEMA)



PREVENTION OF SEXUAL EXPLOITATION AND ABUSE (PSEA) POLICY

FEBRUARY

2022

TABLE OF CONTENT

Introduction _____	3
Purpose _____	4
Scope _____	6
Definitions _____	9
Code of Conduct _____	12
Prevention Measures _____	16
Reporting Procedures _____	20
Accountability _____	28
PSEA Focal Point _____	31
Monitoring and Review _____	34
Consequences for Violation of the PSEA Policy _____	36
Conclusion _____	38
Annexes _____	39
Annex 1: PSEA Code of Conduct Acknowledgment Form _____	39
Annex 2: Incident Reporting Form _____	40
Annex 3: PSEA Investigation Guidelines _____	44
Annex 4: Victim Assistance and Referral Pathway _____	48
Annex 5: Roles and Responsibilities Matrix _____	51
Annex 6: PSEA Training and Awareness Plan _____	54
Annex 7: Community Feedback and Complaints Mechanism Guidelines _____	59

1. Introduction

The Centre for Environment and Migration Assistance (CEMA) is dedicated to fostering an inclusive, safe, and respectful environment for all individuals involved in its programs and operations. This includes employees, beneficiaries, volunteers, contractors, and other stakeholders. CEMA recognizes the vulnerability of certain populations, particularly in the context of its work with refugees, migrants, and other displaced persons, and understands the critical importance of safeguarding them from sexual exploitation, abuse, and harassment (SEA).

CEMA's commitment to preventing sexual exploitation and abuse is central to its core values and operations. The organization operates on the principle that no one, regardless of their position, has the right to exploit, abuse, or mistreat another person in any form. CEMA takes a strict **zero-tolerance approach** toward SEA and is resolute in its determination to prevent such incidents from occurring in its activities and projects. It has established comprehensive measures to protect both beneficiaries and personnel, ensuring that they are treated with dignity, respect, and fairness at all times.

This **Prevention of Sexual Exploitation and Abuse (PSEA) Policy** articulates clear standards for acceptable behavior and outlines the expectations for all individuals associated with CEMA. The policy also establishes robust mechanisms for the reporting, investigation, and resolution of incidents of sexual exploitation, abuse, and harassment. CEMA holds all staff, partners, volunteers, and contractors accountable to these standards, as part of its commitment to creating an environment that promotes trust, safety, and equality.

In alignment with international and national legal frameworks, CEMA ensures that its practices reflect global standards on PSEA. This includes adherence to the **Ugandan Domestic Violence Act (2010)**, which provides a legal framework for addressing and preventing violence, including sexual abuse. Additionally, CEMA aligns with the **United Nations Secretary-General's Bulletin on Special Measures for Protection from Sexual**

Exploitation and Abuse (ST/SGB/2003/13), which provides guidelines for preventing and responding to sexual exploitation and abuse in humanitarian settings.

By implementing this policy, CEMA seeks to protect individuals from all forms of sexual exploitation and abuse, promote a safe working environment, and uphold its responsibilities to its beneficiaries, staff, and the wider community. It is the responsibility of every individual associated with CEMA to fully adhere to the principles of this policy and actively contribute to the prevention of sexual exploitation and abuse.

2. Purpose

The primary purpose of this **Prevention of Sexual Exploitation and Abuse (PSEA) Policy** is to establish a comprehensive framework to prevent and prohibit all forms of sexual exploitation and abuse within the activities, programs, and operations of the Centre for Environment and Migration Assistance (CEMA). The policy aims to uphold the dignity, safety, and rights of all individuals involved with CEMA, particularly the most vulnerable populations such as refugees, migrants, and displaced persons.

The specific objectives of this policy are as follows:

1. Prevent and Prohibit Sexual Exploitation and Abuse in All CEMA Activities, Programs, and Operations

CEMA is committed to ensuring that no individual associated with its programs—whether beneficiaries, staff, volunteers, contractors, or any external parties—engages in any form of sexual exploitation, abuse, or harassment. This policy establishes clear guidelines to safeguard against SEA and to ensure that the organization's operations are free from exploitation and abuse. It covers all CEMA activities, including fieldwork, community engagement, service delivery, and internal operations.

2. Promote a Culture of Respect, Dignity, and Safety

CEMA is committed to fostering an organizational culture that prioritizes the safety, dignity, and well-being of all individuals, particularly those who are most vulnerable, such as refugees, migrants, women, children, and marginalized groups. The organization recognizes that those affected by its projects are at heightened risk of sexual exploitation and abuse, and strives to create an environment where respect and care are central to all interactions. This culture of respect, dignity, and safety ensures that everyone feels protected, valued, and empowered.

3. Ensure All Staff, Partners, Contractors, and Volunteers Understand Their Obligations Regarding PSEA

One of the key elements of this policy is to ensure that all individuals associated with CEMA are fully aware of their responsibilities regarding the prevention of sexual exploitation and abuse. This includes ensuring that all staff, partners, contractors, volunteers, and any other persons working with CEMA receive clear guidance on their obligations to prevent SEA. The policy provides a framework for training, orientation, and awareness-raising on PSEA to guarantee that everyone understands what constitutes sexual exploitation and abuse, and how to uphold the organization's standards.

4. Provide Clear Procedures for Reporting, Investigating, and Responding to Incidents of Sexual Exploitation and Abuse

The policy outlines clear, confidential, and accessible procedures for reporting, investigating, and responding to incidents of sexual exploitation and abuse. This includes the creation of safe, confidential reporting mechanisms for individuals who experience or witness SEA, as well as protocols for timely investigations, response actions, and resolution. CEMA ensures that all reports are taken seriously and handled with sensitivity, ensuring justice and support for victims of sexual exploitation and abuse.

5. Establish Accountability Measures for Individuals and Partners Who Violate CEMA's PSEA Standards

CEMA holds individuals and organizations accountable for their actions, particularly those who violate the principles set out in this policy. This includes implementing disciplinary measures, legal actions, or termination of contracts for staff, partners, contractors, or volunteers found guilty of SEA. The policy establishes clear consequences for non-compliance, which are aimed at deterring misconduct and reinforcing CEMA's commitment to a zero-tolerance approach to sexual exploitation and abuse. Accountability mechanisms ensure that violations are addressed swiftly, fairly, and transparently, and that corrective actions are taken to prevent recurrence.

3. Scope

The **Prevention of Sexual Exploitation and Abuse (PSEA) Policy** applies to a wide range of individuals and entities associated with the Centre for Environment and Migration Assistance (CEMA). It is designed to ensure that all parties connected to CEMA's operations uphold the highest standards of behavior regarding sexual exploitation and abuse, whether within the organization's internal operations or in its external engagements. The following groups are subject to this policy:

1. All Employees of CEMA

This policy applies to all employees of CEMA, regardless of their employment status. This includes:

- **Permanent Employees:** Individuals who are employed on a full-time, indefinite basis with CEMA, including those in senior management, technical, support, and administrative roles.
- **Temporary Employees:** Staff employed for a limited duration, typically for specific projects or assignments, including project-based roles or seasonal staff.

- **Contractual Employees:** Individuals employed under fixed-term contracts, which may include consultants or external advisors brought in for particular expertise or project support.

All CEMA employees are required to adhere to the provisions of this policy, ensuring that sexual exploitation and abuse are prevented in all organizational activities, from fieldwork to administrative tasks.

2. Volunteers, Consultants, and Contractors Working for CEMA

This policy also extends to **volunteers**, **consultants**, and **contractors** who may not be permanent employees but are engaged by CEMA for specific tasks or projects. These individuals may not have a long-term relationship with the organization, but their actions are critical to the success and reputation of CEMA. As such:

- **Volunteers:** Individuals who offer their time and services to CEMA on a non-paid basis but are still integral to the delivery of programs and activities.
- **Consultants:** External experts or advisors brought in to provide specialized knowledge or services to CEMA for a defined period.
- **Contractors:** External service providers or entities contracted by CEMA to deliver goods or services, which may include construction companies, medical service providers, or logistics support teams.

All volunteers, consultants, and contractors working for CEMA are bound by the same ethical obligations and are expected to comply with the guidelines set out in this policy.

3. All Partners, Donors, and Organizations Involved in Joint Activities with CEMA

This policy extends to **partners**, **donors**, and any **organizations** that work alongside CEMA in the implementation of joint projects, initiatives, or programs. These parties are expected to adhere to the principles of PSEA when working in collaboration with CEMA, especially when their activities intersect with vulnerable populations. This includes:

- **Partners:** Local, national, or international organizations with whom CEMA collaborates on specific projects, including other NGOs, UN agencies, and government bodies.
- **Donors:** Institutions or individuals who provide funding or resources for CEMA's projects, and who may have their own set of standards regarding PSEA, but are required to align with CEMA's expectations while funding joint activities.
- **Organizations:** Any external organization engaged with CEMA in a formal or informal capacity, contributing to or participating in shared activities, whether through funding, joint initiatives, or mutual support.

All partners, donors, and organizations involved in joint activities with CEMA are obligated to comply with this policy's principles and to ensure that their own staff and operations are aligned with CEMA's PSEA standards.

4. Beneficiaries of CEMA's Programs, Including Refugees, Migrants, and Vulnerable Groups

The primary focus of CEMA's work is to support vulnerable populations such as **refugees, migrants, and other marginalized groups**. The **beneficiaries** of CEMA's programs are the individuals and communities that the organization seeks to help through its various initiatives. This policy applies to them as well in the sense that:

- CEMA is committed to protecting all program beneficiaries from any form of sexual exploitation or abuse.
- Beneficiaries are encouraged to understand their rights and know the appropriate channels for reporting SEA if they experience or witness such behavior.
- This policy provides safeguards for beneficiaries by ensuring that staff and partners uphold the highest standards of behavior when interacting with vulnerable populations.

By including beneficiaries under the scope of this policy, CEMA ensures that all individuals involved in its programs—whether in positions of power or vulnerability—are equally protected from exploitation and abuse.

5. CEMA Locations

This policy applies to **all CEMA locations**, including but not limited to:

- **CEMA Offices:** The central administrative offices where CEMA staff work and conduct operations.
- **Field Sites:** The various locations where CEMA carries out its programs, including rural, remote, and refugee settlement areas. These field sites may be in both urban and rural settings, and the policy applies equally in these diverse environments.
- **Project Areas:** Specific locations or communities where CEMA implements its programs, such as refugee camps, migrant settlement areas, or community development projects.

Regardless of the location, all CEMA staff, volunteers, contractors, and partners are expected to follow this policy and maintain the highest ethical standards to prevent sexual exploitation and abuse, ensuring a safe and respectful environment for all.

4. Definitions

This section provides clear and precise definitions of key terms related to the **Prevention of Sexual Exploitation and Abuse (PSEA)** policy. These definitions will guide the understanding and implementation of the policy and ensure clarity in the identification, reporting, and handling of incidents of sexual exploitation, abuse, and harassment within CEMA's operations.

1. Sexual Exploitation

Sexual exploitation refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. This can occur in various contexts, particularly where individuals or groups are vulnerable due to their dependence on aid, services, or employment. Sexual exploitation includes, but is not limited to:

- **Exchange of resources for sex:** This includes situations where individuals in positions of power (such as staff, contractors, or volunteers) demand or solicit sex or sexual favors in exchange for employment, goods, services, or other forms of assistance.
- **Sexual favors for benefits:** This involves demanding or receiving sexual favors in return for benefits such as food, shelter, medical assistance, education, or job opportunities.
- **Other forms of exploitation:** Any action that uses a person's vulnerability, dependency, or position of trust to gain sexual favors or services.

Sexual exploitation undermines the dignity and rights of individuals, particularly vulnerable populations, and is a violation of CEMA's values and standards.

2. Sexual Abuse

Sexual abuse refers to any act of **physical intrusion of a sexual nature** that occurs through force, coercion, or under unequal or threatening conditions. This includes but is not limited to:

- **Physical assault:** Any form of sexual assault or attempted sexual assault, whether or not the victim consents.
- **Coercion or manipulation:** Sexual acts or advances made under duress, threat, or abuse of power, where the victim feels unable to freely give consent due to fear, intimidation, or manipulation.
- **Force or threats:** Sexual activities forced upon an individual through physical force or the threat of harm.

Sexual abuse is a serious violation of human rights and dignity, and it can cause long-lasting physical, emotional, and psychological harm to the victims.

3. Sexual Harassment

Sexual harassment refers to **unwelcome or inappropriate conduct of a sexual nature** that creates an **intimidating, hostile, or offensive environment** for the victim. This can include:

- **Verbal harassment:** Unsolicited or inappropriate sexual comments, jokes, or propositions.
- **Physical harassment:** Unwelcome touching, advances, or physical proximity that makes an individual uncomfortable.
- **Non-verbal harassment:** Leering, inappropriate gestures, or displaying sexually suggestive materials or messages.
- **Harassing behavior in the workplace or project settings:** Persistent, unwanted behaviors that affect the dignity of an individual or group.

Sexual harassment does not necessarily involve physical contact but still represents a violation of professional behavior and ethical standards. It can have a detrimental impact on a person's emotional well-being and their ability to perform effectively in their professional role or project-related duties.

4. Victim

A **victim** is an individual who has been subjected to sexual exploitation, abuse, or harassment by a staff member, volunteer, partner, contractor, or any other person associated with CEMA. Victims can be:

- **Beneficiaries** of CEMA's programs, including refugees, migrants, or any vulnerable persons engaged in CEMA-supported projects.
- **Staff members**, including employees, volunteers, or contractors, who may be subjected to inappropriate behavior by colleagues, supervisors, or other individuals within the organization.

- **External individuals** who may be affected by CEMA's operations or field activities.

It is essential that all victims of sexual exploitation, abuse, or harassment are treated with dignity and respect, ensuring their right to report incidents without fear of retaliation or further harm.

5. Perpetrator

A **perpetrator** is any person who engages in or is suspected of engaging in **sexual exploitation, abuse, or harassment**. This can include:

- **CEMA staff:** Employees, contractors, and volunteers who violate the standards set out in the PSEA policy.
- **Partners or external personnel:** Individuals or representatives of external organizations, including service providers, consultants, or donors, who engage in exploitative or abusive behavior in their interactions with CEMA staff, beneficiaries, or other stakeholders.
- **Any individual associated with CEMA's activities:** This includes anyone with access to CEMA's operations, such as visitors, suppliers, or others who may engage in exploitation or abuse.

The **perpetrator** is responsible for any actions that contravene the principles of respect, dignity, and safety outlined in this policy, and they are subject to disciplinary and legal actions, including termination, prosecution, or sanctions as appropriate.

5. Code of Conduct

CEMA's **Code of Conduct** is central to maintaining a safe, respectful, and ethical working environment. This code outlines the behavioral standards and expectations for all individuals associated with CEMA, including employees, volunteers, contractors, partners, and any other stakeholders. CEMA takes a zero-tolerance stance toward any

form of sexual exploitation, abuse, or harassment and holds everyone accountable for upholding the integrity and values of the organization.

The following behaviors are explicitly **prohibited under this policy**:

1. Sexual Exploitation

Sexual exploitation is strictly prohibited at CEMA. This includes any act of **coercion, manipulation, or abuse of a position of power** to solicit or demand sexual favors, acts, or relationships. It is unethical and violates the principles of respect, dignity, and integrity that CEMA upholds. Specific actions considered as sexual exploitation include, but are not limited to:

- **Offering benefits in exchange for sexual acts:** Coercing or promising employment, goods, services, or other benefits in return for sex or sexual favors.
- **Sexual coercion within power dynamics:** Exploiting a position of authority (e.g., manager, supervisor) to manipulate individuals into sexual acts.
- **Transactional sexual relationships:** Seeking or engaging in sexual activities with beneficiaries, colleagues, or others in exchange for favors or resources.

Such actions represent a fundamental violation of human rights and the core values of CEMA, which are grounded in respect for the dignity and well-being of all individuals.

2. Sexual Abuse

Sexual abuse encompasses any form of **physical, emotional, or verbal assault of a sexual nature** that occurs within CEMA's operations. This includes both overt and covert forms of abuse, where a person is subjected to sexual harm or threat under coercive, unequal, or exploitative conditions. This can manifest in the following ways:

- **Physical sexual assault:** Any act of unwanted or forced sexual touching, sexual violence, or any form of physical intrusion of a sexual nature.

- **Verbal or emotional abuse:** Unsolicited sexual comments, advances, or intimidation of a sexual nature.
- **Coercion through abuse of power:** Demanding or encouraging sexual activity in situations where one party is in a vulnerable or dependent position (such as a subordinate, a beneficiary, or a community member).

Sexual abuse violates the trust placed in CEMA and causes significant harm to the victim, and CEMA condemns any form of such behavior within its activities or operations.

3. Child Sexual Abuse

Child sexual abuse refers to any form of **sexual activity or exploitation involving minors (persons under the age of 18)**, regardless of whether the minor appears to consent or not. This includes:

- **Engaging in sexual acts with minors:** Any sexual contact or activity with a person under the age of 18 is strictly prohibited.
- **Sexual exploitation of minors:** Using a position of authority or influence to solicit or demand sexual favors or relationships from a child or minor.
- **Child pornography:** The production, distribution, or possession of any form of child pornography or sexual exploitation material.

CEMA maintains a zero-tolerance policy for child sexual abuse. Such actions are not only unethical but also illegal, and they will lead to immediate disciplinary action and legal consequences, including reporting to authorities.

4. Failure to Report

CEMA holds every individual accountable for ensuring the safety and well-being of others within its programs and operations. **Failure to report** any incidents or suspicions of sexual exploitation, abuse, or harassment is a breach of the Code of Conduct. This includes:

- **Failure to report witnessed incidents:** Individuals who are aware of, or witness, sexual exploitation, abuse, or harassment and fail to report it in accordance with CEMA's reporting procedures are violating the ethical standards of the organization.
- **Failure to intervene or prevent:** Even if not directly involved in the incident, individuals who are in positions to intervene or prevent further harm must take appropriate action to stop abuse or exploitation and ensure the safety of the victim.
- **Concealing incidents:** Attempting to conceal, downplay, or ignore reports of sexual misconduct within the organization will result in serious disciplinary action.

By failing to report incidents, individuals allow harmful behavior to continue unchecked, which can endanger others and damage the integrity of CEMA's mission and objectives.

5. Abuse of Power

Abuse of power refers to using one's position of authority, influence, or trust within CEMA to demand or coerce sexual favors, create sexual relationships, or manipulate individuals for personal sexual gain. This includes:

- **Sexual demands by authority figures:** Individuals in positions of power, such as managers, supervisors, or other staff members, using their authority to manipulate, pressure, or coerce subordinates or beneficiaries into sexual acts or relationships.
- **Manipulating vulnerable individuals:** Exploiting a person's dependence on the organization's services, resources, or assistance to solicit sexual favors.
- **Favoritism and coercion:** Offering preferential treatment or promises of benefits in exchange for sexual compliance or engagement.

Abuse of power undermines the trust in the organization and creates an unsafe environment for employees, beneficiaries, and stakeholders. CEMA's Code of Conduct demands that individuals in positions of power use their authority responsibly and

ethically, ensuring that all interactions are respectful, professional, and free from exploitation.

6. Prevention Measures

CEMA is dedicated to creating a safe environment where sexual exploitation, abuse, and harassment are actively prevented. The organization will implement comprehensive measures to ensure that all individuals associated with CEMA are well-informed and empowered to contribute to a protective environment. These prevention measures aim to reduce risks and enhance accountability while maintaining a culture of respect, dignity, and safety.

1. Ensure a Clear Reporting Mechanism

CEMA recognizes that accessible, confidential, and safe reporting mechanisms are critical in addressing sexual exploitation and abuse. The organization is committed to providing several channels for individuals to report concerns or incidents related to PSEA without fear of retaliation or further harm. The reporting mechanisms will include:

- **PSEA Hotline:** A dedicated, confidential phone line that is available 24/7 for individuals to report concerns anonymously or directly to CEMA's designated PSEA focal point.
- **Email Reporting:** A secure, monitored email address where individuals can send reports of sexual exploitation or abuse. This ensures that reports can be made without physical presence, providing flexibility for the individuals involved.
- **Senior Management Reporting:** Employees, beneficiaries, or any stakeholders who wish to report an incident can escalate concerns directly to senior management through established procedures. This guarantees that reports are handled at the appropriate level of authority.

- **Third-party Reporting:** CEMA will partner with independent organizations, such as trusted community leaders or civil society groups, to ensure reports can be made to a third party if individuals feel uncomfortable reporting internally.

These reporting channels are designed to be easily accessible, confidential, and responsive to concerns related to sexual exploitation and abuse, ensuring that individuals can report incidents in a secure and protected environment.

2. Staff Training and Awareness

To effectively prevent sexual exploitation and abuse, CEMA will ensure that all staff, volunteers, contractors, and partners understand their roles and responsibilities in upholding the PSEA policy. The organization will implement comprehensive training programs that cover:

- **PSEA Policy Training:** All employees, contractors, and partners will undergo mandatory training on CEMA's PSEA policy. The training will focus on understanding what constitutes sexual exploitation, abuse, and harassment, as well as the organization's zero-tolerance stance on such behaviors.
- **Role-specific Responsibilities:** Training will be tailored to address the specific duties of different roles, ensuring that all staff members are clear on their responsibilities, how to recognize signs of exploitation or abuse, and how to report concerns appropriately.
- **Survivor-Centered Approach:** Staff will be trained on how to handle disclosures sensitively, support survivors, and maintain confidentiality during the investigation and response processes.
- **Periodic Refresher Courses:** CEMA will offer ongoing training and refresher courses to reinforce the importance of the PSEA policy, update staff on any changes to the law or policy, and ensure continuous vigilance in preventing exploitation and abuse.

These efforts aim to cultivate a culture of awareness and sensitivity, ensuring that everyone involved with CEMA understands how to prevent and address sexual exploitation and abuse.

3. Background Checks

CEMA recognizes that background checks are essential in safeguarding the organization and its beneficiaries from potential harm. As part of the recruitment process, CEMA will:

- **Pre-employment Screening:** CEMA will conduct thorough background checks on all potential employees, contractors, and volunteers before they are hired. These checks will include criminal record verification and checks with relevant authorities or organizations to ensure that no individual with a history of sexual exploitation, abuse, or misconduct is employed or engaged by CEMA.
- **Reference Checks:** CEMA will also require references from previous employers or organizations to verify the individual's character and professional conduct, specifically relating to their integrity and commitment to ethical behavior.
- **Ongoing Monitoring:** In addition to initial background checks, CEMA will ensure that staff and partners remain subject to periodic monitoring to uphold ethical standards and prevent any reoccurrence of harmful behavior.

These measures will help to minimize the risk of engaging individuals with a history of sexual exploitation or abuse, thereby protecting the organization and its beneficiaries.

4. Code of Conduct Acknowledgment

CEMA's **Code of Conduct** outlines clear behavioral standards and ethical expectations for all staff, volunteers, contractors, and partners. To ensure understanding and compliance:

- **Signed Acknowledgment:** All new employees, contractors, and partners will be required to sign the Code of Conduct upon joining CEMA. This will acknowledge their understanding of the PSEA policy, their responsibilities in adhering to it, and the consequences of failing to do so.
- **Refresher Trainings:** Staff will be reminded of their responsibilities and the importance of maintaining ethical conduct through periodic reviews and refresher sessions.

- **Enforcement of Accountability:** By signing the Code of Conduct, all individuals commit to upholding the PSEA standards, with clear consequences for breaches, including disciplinary action, termination, and legal proceedings if necessary.

This approach ensures that all individuals associated with CEMA understand the seriousness of PSEA and their obligation to maintain a safe and respectful working and living environment.

5. Community Engagement

CEMA is committed to empowering the communities it serves, ensuring that they understand their rights and know how to seek help if they experience or witness sexual exploitation, abuse, or harassment. This will involve:

- **Community Education Programs:** CEMA will work with local communities, including refugees, migrants, and vulnerable groups, to raise awareness about the dangers of sexual exploitation and abuse. This includes information about how to recognize abusive behaviors, the importance of consent, and how to report incidents.
- **Rights Awareness:** CEMA will educate community members about their rights to a safe and respectful environment and ensure they understand that they are entitled to protection from any form of exploitation or abuse, regardless of their social or economic status.
- **Accessible Reporting Channels:** CEMA will ensure that beneficiaries, including marginalized groups, have access to safe, confidential, and non-stigmatizing ways to report any concerns of sexual exploitation or abuse. This includes providing physical locations within communities where reports can be made and ensuring that reporting mechanisms are adapted to the needs of vulnerable individuals.
- **Feedback and Participation:** CEMA will create spaces for community feedback on PSEA efforts, allowing beneficiaries to voice their concerns, suggest improvements, and actively engage in the organization's protective measures.

This ensures that CEMA's efforts are reflective of community needs and are as inclusive as possible.

By involving the community in PSEA prevention, CEMA aims to foster a collective sense of responsibility, ensuring that both beneficiaries and staff members are active participants in maintaining a safe and respectful environment.

7. Reporting Procedures

CEMA is committed to ensuring that all reports of sexual exploitation, abuse, or harassment are taken seriously, investigated promptly, and handled with the utmost respect for the affected individuals. The organization encourages anyone who witnesses or is affected by such incidents to report them immediately. To support a safe, respectful, and accountable environment, CEMA has established clear and accessible reporting procedures.

1. Immediate Reporting

CEMA encourages individuals to report any witnessed or experienced incidents of sexual exploitation, abuse, or harassment as soon as they occur. Prompt reporting is crucial in addressing these issues and preventing further harm. Individuals can report incidents through various channels:

- **PSEA Focal Point:** Every CEMA office or project location will have a designated PSEA focal point responsible for receiving reports of sexual exploitation and abuse. This focal point will be trained in the relevant policies and procedures for handling such reports.
- **Senior Staff Members:** If the PSEA focal point is unavailable, or the individual prefers to report to a senior staff member, reports can be made directly to a supervisor or a member of senior management.

- **Hotline:** CEMA will provide a dedicated confidential hotline for reporting incidents. This hotline will be available 24/7 and is designed to allow anonymous reporting where desired.
- **Email and Confidential Reporting System:** CEMA will also offer an email address or online reporting platform where individuals can submit their complaints or concerns. This system ensures that all reports are logged and handled securely.
- **In-Person Reporting:** For individuals who prefer face-to-face communication, CEMA will designate safe locations where individuals can report incidents in person. These spaces will be confidential and sensitive to the needs of complainants.

The organization emphasizes that reports should be made as soon as possible to enable timely responses and to ensure the safety and well-being of individuals involved.

2. Confidentiality

CEMA understands the sensitive nature of PSEA-related reports and commits to protecting the confidentiality of those who report incidents. Key aspects of CEMA's confidentiality protocols include:

- **Discretion in Handling Reports:** All reports of sexual exploitation, abuse, or harassment will be treated confidentially and will only be shared within the investigation process. Information will not be disclosed to unauthorized individuals or parties.
- **Protection of Complainants' Identity:** CEMA will ensure that the identities of complainants are kept private unless they explicitly consent to disclosure. The anonymity and privacy of the affected individuals will be prioritized throughout the investigation and response process.
- **Legal Requirements:** In some circumstances, such as when required by law or to safeguard the safety and well-being of others, CEMA may need to share information with external authorities. However, CEMA will make every effort to

inform the complainant and ensure that their rights are respected during such processes.

By ensuring confidentiality, CEMA aims to create an environment in which individuals feel safe coming forward with concerns without fear of exposure or further harm.

3. Investigation

CEMA will ensure that all reports of sexual exploitation, abuse, or harassment are thoroughly investigated to determine the facts and take appropriate action. The investigative process will include the following:

- **Timely Response:** CEMA will initiate an investigation as soon as a report is received, ensuring that all incidents are addressed promptly to prevent further harm and ensure accountability.
- **Impartiality and Fairness:** Investigations will be conducted by impartial and qualified personnel. CEMA will ensure that the investigation process is unbiased, with respect for the rights and dignity of both the complainant and the alleged perpetrator.
- **Thorough Examination:** All relevant evidence will be gathered and reviewed, and the investigation will be carried out in line with national laws, international best practices, and CEMA's internal policies.
- **Support for Complainants:** Throughout the investigation process, CEMA will offer support to the complainant, ensuring they are informed of the progress and outcomes of the investigation. Support services may include counseling, legal assistance, or referrals to external support organizations.

The goal of the investigation is to establish whether the reported incident is substantiated, and if so, to determine appropriate consequences for the perpetrator(s), including disciplinary actions, termination, or legal action as needed.

4. Protection of Complainants

CEMA is committed to protecting the safety and well-being of individuals who report incidents of sexual exploitation, abuse, or harassment. Key measures to protect complainants include:

- **Non-retaliation:** CEMA has a strict non-retaliation policy to protect individuals who report incidents from any form of retaliation, victimization, or harm. Any act of retaliation against a complainant will result in disciplinary action and may lead to termination or legal consequences.
- **Support for Complainants:** CEMA will provide psychological, medical, and legal support to complainants as needed. This support can include access to counseling, healthcare, and external legal services, helping to ensure that complainants feel safe, supported, and empowered throughout the process.
- **Safe Environment:** CEMA will ensure that complainants are not exposed to any further harm during the investigation. If necessary, the organization will take steps such as reassigning individuals or offering relocation or security measures.
- **Right to Withdraw:** Complainants have the right to withdraw their report at any stage. However, CEMA will continue to ensure their safety and well-being and will respect their wishes regarding any further action.

CEMA's goal is to ensure that those who report sexual exploitation, abuse, or harassment are not penalized for speaking out but are instead provided with the protection, support, and resources they need to recover and heal.

By providing a comprehensive, accessible, and confidential reporting mechanism, CEMA ensures that all individuals involved with the organization can safely report any incidents of sexual exploitation, abuse, or harassment. The organization takes these reports seriously and commits to addressing all incidents promptly, fairly, and in line with both legal and ethical standards. These procedures are central to CEMA's commitment to safeguarding the well-being of all individuals involved with its operations.

8. Response to Sexual Exploitation and Abuse

CEMA takes all allegations of sexual exploitation and abuse (SEA) seriously and is committed to ensuring that appropriate actions are taken in response to such incidents. The organization will follow a transparent, fair, and thorough approach to address allegations and support both the victims and the accused individuals. The response will be guided by the principle of zero tolerance for sexual exploitation and abuse.

1. Immediate Suspension

When an allegation of sexual exploitation or abuse is reported, CEMA will take prompt action to ensure the safety and well-being of all individuals involved. As part of the initial response:

- **Temporary Suspension:** The alleged perpetrator may be immediately suspended from their duties pending the outcome of the investigation. This suspension is not a presumption of guilt but a protective measure to ensure that the investigation can proceed without interference and to protect the victim and other individuals from potential harm.
- **Safeguarding Measures:** If necessary, CEMA will take further safeguarding actions, including reassigning the accused individual to non-sensitive duties or locations, or ensuring that the complainant and the accused are not in close contact during the investigation process.
- **Confidentiality During Suspension:** The suspension process will be conducted with strict confidentiality to protect the reputations and rights of both the complainant and the accused until the investigation is completed.

2. Disciplinary Actions

CEMA is committed to taking decisive action in cases where sexual exploitation, abuse, or harassment is substantiated. Disciplinary measures will be applied in

accordance with the severity of the violation and the findings of the investigation. Potential outcomes include:

- **Termination of Employment:** If an individual is found guilty of engaging in sexual exploitation, abuse, or harassment, they will face termination of employment or contract. This action will be taken to uphold the integrity of CEMA's commitment to a safe and respectful environment.
- **Legal Action:** In cases where the act of sexual exploitation or abuse is considered a criminal offense under Ugandan law, CEMA will cooperate with law enforcement agencies and may refer the case to the police or judicial authorities for further legal proceedings.
- **Referral to External Authorities:** In situations where the incident extends beyond the internal jurisdiction of CEMA or involves other stakeholders, the case may be referred to external oversight bodies, such as government agencies, human rights organizations, or international bodies like the United Nations.
- **Other Disciplinary Measures:** Depending on the specific circumstances, other forms of disciplinary action may include demotion, reprimand, or other corrective actions as appropriate. These will be based on the findings of the investigation and in accordance with CEMA's internal policies and labor laws.

The disciplinary actions taken will be fair, proportionate to the severity of the incident, and in line with CEMA's values of accountability and transparency.

3. Psychosocial Support

CEMA recognizes the profound impact that sexual exploitation and abuse can have on victims. The organization is committed to providing comprehensive support services to all victims to help them recover and heal. Support services will be offered in a sensitive, compassionate, and confidential manner, and may include:

- **Counseling Services:** Victims of sexual exploitation and abuse will be provided with professional counseling and psychological support to help them cope with the emotional and mental health effects of the incident. This may involve

individual counseling sessions, group therapy, or referrals to external mental health providers.

- **Medical Care:** Victims will have access to immediate and ongoing medical care as needed. This includes treatment for physical injuries, sexually transmitted infections (STIs), emergency contraception, and any other necessary medical interventions. CEMA will work with local health facilities to ensure that victims receive timely and appropriate medical attention.
- **Legal Aid:** Victims will be informed of their legal rights and offered assistance in accessing legal support if they wish to pursue legal action. This may include referrals to legal experts, assistance in navigating the justice system, and help with filing police reports or pursuing court cases.
- **Referral to External Services:** If needed, CEMA will refer victims to trusted external agencies specializing in providing long-term support for survivors of sexual violence, such as shelters, human rights organizations, and specialized social services.
- **Ongoing Support:** CEMA will continue to support victims beyond the immediate aftermath of the incident, ensuring that they receive the care and assistance they need to rebuild their lives and fully recover.

4. Prevention of Re-victimization

CEMA is committed to ensuring that victims of sexual exploitation and abuse are not re-victimized through the response process. To avoid any further harm:

- **Confidentiality and Privacy:** All information related to the victim will be handled with the utmost confidentiality. The identity of the victim and details of the abuse will not be disclosed without their explicit consent, except as required by law or to facilitate the investigation and response process.
- **Safe and Supportive Environment:** Victims will be assured of a safe, supportive, and non-judgmental environment during all stages of the response. CEMA will take steps to prevent any re-traumatization or stigmatization of the victim during the investigation, disciplinary, or support processes.

5. Victim-Centered Approach

CEMA's response will prioritize the well-being and rights of the victim. The organization will:

- **Ensure Victim Empowerment:** Victims will be provided with all necessary information to make informed decisions about their recovery options, including reporting, accessing medical or psychological care, and taking legal action.
- **Respect Victim Choices:** While CEMA encourages individuals to pursue legal action, it respects the victim's right to decide how to proceed with the case. Victims will not be pressured to take any particular course of action.

6. Communication and Transparency

CEMA will ensure transparency in its response to sexual exploitation and abuse cases, while maintaining the confidentiality of victims. The following measures will be implemented:

- **Clear Communication:** CEMA will communicate the outcomes of investigations to both the victim and the alleged perpetrator. The decision-making process, including the reasoning for any disciplinary action, will be explained clearly and respectfully.
- **Transparency with Stakeholders:** In cases of significant impact, CEMA will inform relevant stakeholders, including donors and partners, about the actions taken in response to SEA allegations. This will be done in a way that respects the confidentiality and privacy of the individuals involved.

9. Accountability

CEMA is committed to ensuring that its Prevention of Sexual Exploitation and Abuse (PSEA) Policy is not only adopted but actively enforced at all levels of the organization. Accountability is central to upholding a safe, respectful, and dignified environment for beneficiaries, staff, and partners. To this end, the organization has established robust accountability mechanisms designed to promote transparency, trust, and continuous improvement in addressing and preventing SEA.

1. Monitoring and Evaluation

CEMA will establish and maintain a systematic approach to monitoring and evaluating the implementation of its PSEA policy to ensure its effectiveness. This includes:

- **Regular Reviews:** PSEA compliance will be reviewed quarterly as part of CEMA's internal monitoring processes. These reviews will assess adherence to PSEA procedures, reporting mechanisms, training coverage, and incident response.
- **PSEA Indicators:** Key performance indicators (KPIs) will be integrated into CEMA's organizational performance framework. These indicators may include the number of staff trained on PSEA, the number of cases reported and resolved, and levels of community awareness.
- **Feedback from Beneficiaries and Staff:** Anonymous feedback tools such as suggestion boxes, surveys, and focus group discussions will be used to collect input from beneficiaries and staff about the effectiveness and accessibility of PSEA mechanisms.
- **Independent Audits:** Where feasible, independent audits or evaluations will be conducted to assess how well CEMA is meeting its PSEA commitments.

2. Reporting to Donors and Stakeholders

CEMA recognizes the importance of transparency and open communication with its donors, partners, and stakeholders. The organization will:

- **Provide Regular Updates:** CEMA will include PSEA implementation updates in donor reports, progress reports, and annual reviews. These updates will include data on training sessions held, awareness campaigns conducted, and the status of any reported SEA cases—while protecting confidentiality.
- **Incident Reporting:** In cases of substantiated SEA incidents, CEMA will inform relevant donors and partners, in accordance with partnership agreements and applicable donor policies. These communications will be handled with discretion, ensuring the privacy and protection of victims.
- **Stakeholder Engagement:** CEMA will engage stakeholders in improving PSEA measures by sharing lessons learned and best practices across organizations and networks. This collaborative approach aims to strengthen the collective capacity to prevent SEA.

3. Follow-Up on Reported Cases

Accountability also requires that reported incidents of sexual exploitation and abuse are not only addressed promptly but that they are followed through to resolution.

CEMA will ensure:

- **Case Tracking System:** A confidential case management and tracking system will be maintained to document and follow up on all reported SEA cases from initial report to closure. This system will record the date of report, actions taken, outcomes, and the status of the case.
- **Timely Response:** Each report will be acknowledged promptly, and investigations will be initiated without delay. CEMA will aim to resolve cases within a defined timeframe, with regular updates provided to affected parties.
- **Management Oversight:** Senior leadership, including the Executive Director and Board of Directors, will be regularly updated on reported cases and PSEA implementation progress. This will ensure that leadership remains actively involved in enforcing accountability.
- **Lessons Learned and Policy Improvement:** All closed cases will be reviewed to identify lessons learned, which will inform future training, policy revisions, and procedural improvements.

4. Disciplinary and Legal Accountability

Ensuring accountability means holding individuals and partners accountable for breaches of the PSEA policy:

- **Staff and Partners:** Any staff member, volunteer, or partner found to be in violation of CEMA's PSEA policy will be subject to disciplinary measures in accordance with the organization's HR policies. This may include dismissal, suspension, or referral to legal authorities.
- **Failure to Act:** Supervisors or managers who fail to take appropriate action upon learning of SEA allegations will also be held accountable. Negligence in upholding the policy will be considered a serious breach of duty.
- **Whistleblower Protection:** Individuals who report SEA in good faith will be protected from retaliation. CEMA will treat retaliation against whistleblowers as a disciplinary offense subject to appropriate sanctions.

5. Public Accountability

CEMA will strive to ensure that communities it serves are aware of its zero-tolerance approach to SEA and are empowered to hold the organization accountable. This includes:

- **Public Display of PSEA Commitments:** CEMA will publicly display its PSEA policy and reporting mechanisms in all offices, project sites, and beneficiary-facing spaces.
- **Community Reporting Channels:** Community feedback and complaints mechanisms will be strengthened and maintained to allow safe, accessible, and confidential reporting of SEA concerns by community members.
- **Participation in Accountability Forums:** CEMA will participate in relevant PSEA working groups and humanitarian accountability forums in Uganda to promote joint accountability efforts and coordination.

To strengthen its institutional capacity to prevent and respond to sexual exploitation and abuse (SEA), the Centre for Environment and Migration Assistance (CEMA) will designate a qualified and trained **PSEA Focal Point**. This individual will play a central role in ensuring that CEMA's PSEA policy is effectively implemented across all organizational levels and field operations.

Appointment and Qualifications

- The PSEA Focal Point will be appointed by senior management and must possess relevant experience in safeguarding, gender-based violence prevention, or protection.
- The individual must demonstrate high levels of integrity, confidentiality, and sensitivity, and will be trained in PSEA principles and survivor-centered response approaches.
- Alternate PSEA Focal Points may be designated for larger programs or remote field sites to ensure accessibility and consistency.

Key Responsibilities

The responsibilities of the PSEA Focal Point will include, but are not limited to:

1. Coordination of PSEA Activities

- Lead and coordinate the implementation of CEMA's PSEA strategy across all departments and program areas.
- Collaborate with program teams to integrate PSEA into all stages of project planning, implementation, and evaluation.
- Ensure the organization's PSEA policy and Code of Conduct are communicated and enforced among staff, volunteers, partners, and contractors.
- Coordinate with other organizations, inter-agency PSEA networks, and national safeguarding coalitions to promote best practices and shared learning.

2. Awareness and Training

- Conduct or coordinate regular PSEA training and refresher courses for staff, volunteers, and contractors.
- Ensure that all new recruits receive mandatory PSEA induction and sign the Code of Conduct.
- Facilitate sensitization sessions for community members and beneficiaries to raise awareness of their rights and the mechanisms available to report SEA.

3. Reporting and Case Management

- Serve as the primary point of contact for receiving SEA reports and concerns through established confidential reporting channels.
- Ensure that reporting mechanisms (hotlines, email, suggestion boxes, in-person reporting) are accessible, culturally appropriate, and widely communicated to staff and beneficiaries.
- Document and refer SEA allegations for investigation according to CEMA's procedures, while maintaining strict confidentiality.
- Work with designated case managers, protection officers, or legal teams to ensure that survivors receive appropriate medical, psychosocial, legal, and protection support.

4. Investigations and Compliance

- Liaise with senior management, human resources, and legal advisors to coordinate internal investigations in cases of SEA, ensuring that investigations are prompt, impartial, and survivor-centered.
- Monitor and follow up on the progress and outcome of investigations, ensuring accountability for perpetrators and support for victims.
- Serve as a contact point for coordination with external investigators, donors, and protection partners where needed.

5. Monitoring and Reporting

- Maintain a secure, anonymized register of SEA reports for analysis and reporting, in line with data protection principles.
- Compile regular reports on PSEA activities, challenges, and progress for management and donors.
- Track PSEA indicators and contribute to evaluations of CEMA's safeguarding performance.

6. Survivor Support and Protection

- Ensure that survivors of SEA receive timely and appropriate care, including referrals to gender-based violence service providers, legal aid, and psychosocial counseling.
- Advocate for survivor safety, dignity, and confidentiality in all responses.
- Monitor the well-being of complainants and whistleblowers to prevent retaliation and re-victimization.

7. Risk Assessment and Mitigation

- Identify SEA risks in programs and operations and advise management on strategies to mitigate these risks.
- Support program teams in incorporating safeguarding considerations into needs assessments, field activities, procurement processes, and partnership agreements.

Reporting Line and Support

- The PSEA Focal Point will report directly to CEMA's Executive Director or a designated senior manager to ensure that PSEA receives appropriate institutional attention and resources.
 - The role will be supported by an internal PSEA Working Group or Safeguarding Committee, where applicable, to facilitate cross-departmental collaboration.
-

11. Monitoring and Review

The Centre for Environment and Migration Assistance (CEMA) is committed to ensuring that the Prevention of Sexual Exploitation and Abuse (PSEA) Policy remains dynamic, effective, and aligned with both national and international safeguarding standards. To achieve this, the organization will undertake a structured and participatory monitoring and review process to evaluate implementation, strengthen compliance, and continuously improve the effectiveness of PSEA measures.

11.1. Policy Review and Update

- The PSEA Policy will be formally **reviewed at least once every year** by senior management, the PSEA Focal Point, and relevant departments.
- The review will take into account:
 - Updates to national legislation (e.g., Uganda's Domestic Violence Act, Employment Act).
 - Revisions to international PSEA standards and frameworks, including UN guidelines.
 - Lessons learned from past cases or audit findings.
 - Feedback from beneficiaries, staff, and partners.
- Any revisions must be approved by CEMA's **Board of Directors**, and the updated policy will be re-communicated and re-distributed across the organization.

11.2. Monitoring and Compliance Checks

- CEMA will establish a **routine monitoring system** to assess compliance with the PSEA policy across programs, projects, and operational units.
- Monitoring activities will include:
 - **Spot-checks and audits** to ensure adherence to PSEA procedures and reporting protocols.
 - **Review of incident reports and case tracking logs** maintained by the PSEA Focal Point.

- **Surveys or anonymous feedback tools** to gauge the knowledge and awareness of PSEA standards among staff and communities.
 - Regular **PSEA compliance checklists** completed by program managers and field officers.
- Reports and findings from monitoring will inform action plans to address any identified gaps or risks.

11.3. Stakeholder and Community Feedback

- CEMA recognizes that the effectiveness of its PSEA efforts depends on **active participation and feedback** from the people it serves.
- Feedback mechanisms will include:
 - **Focus group discussions** and **exit interviews** with beneficiaries, particularly women, youth, and marginalized groups.
 - **Partner debrief sessions** and joint evaluations with contractors, implementing partners, and donor agencies.
 - **Community complaints and feedback mechanisms**, such as hotlines and community committees.
- Information from these sources will be systematically analyzed to strengthen trust, accountability, and transparency.

11.4. Reporting on Monitoring Outcomes

- The results of policy reviews and monitoring efforts will be documented in **PSEA performance reports**.
- These reports will be:
 - Shared with CEMA leadership and key stakeholders, including donors, upon request.
 - Used to guide future **PSEA training, resource allocation, and policy development**.
 - Made available in summary form to staff and community stakeholders to promote transparency.

11.5. Continuous Improvement

- Based on monitoring outcomes and reviews, CEMA will:
 - **Refine training materials**, reporting tools, and risk mitigation strategies.
 - Introduce or revise **Standard Operating Procedures (SOPs)** to enhance field-level implementation.
 - Strengthen partnerships with national protection agencies and local organizations to improve coordination on safeguarding.

By institutionalizing robust monitoring and review mechanisms, CEMA aims to ensure that its PSEA policy is more than a formal document—it becomes a living framework for safeguarding dignity, preventing harm, and responding with integrity.

12. Consequences for Violation of the PSEA Policy

The Centre for Environment and Migration Assistance (CEMA) maintains a **zero-tolerance policy** toward sexual exploitation, abuse, and harassment (SEA). Any violation of this PSEA policy by staff, volunteers, contractors, or partners will be treated with the utmost seriousness and addressed swiftly, fairly, and in line with both internal disciplinary procedures and national laws.

12.1. Disciplinary Measures

CEMA will apply proportionate disciplinary actions based on the nature and severity of the violation, which may include:

- **Verbal or written warnings** for minor breaches that do not involve direct harm but show negligence or non-compliance with safeguarding protocols.
- **Suspension from duties** during the investigation of an alleged incident to protect victims and preserve the integrity of the investigative process.
- **Immediate termination of employment or contract** for individuals found to have engaged in SEA or failed to report known incidents, in violation of their duty of care.

12.2. Legal Accountability

Where appropriate, CEMA will refer perpetrators to **law enforcement authorities** in accordance with Ugandan law. This may result in:

- **Criminal prosecution**, depending on the severity and legal classification of the offense (e.g., defilement, rape, assault).
- **Civil liability**, where applicable, for damages or other legal claims made by victims.
- **Reporting to professional bodies or regulatory authorities**, where misconduct may violate professional standards (e.g., for medical or legal personnel).

CEMA will cooperate fully with legal authorities during investigations and proceedings and may also engage third-party legal counsel to support the process.

12.3. Organizational Sanctions

Beyond individual consequences, CEMA reserves the right to impose institutional sanctions on entities that violate the PSEA policy. This includes:

- **Termination of partnership agreements** with contractors, vendors, or implementing partners found complicit in SEA.
- **Disqualification from future funding or procurement opportunities** within CEMA programs.
- **Public disclosure or reporting to donor agencies** and global PSEA coordination bodies, as appropriate.

12.4. Protection from Retaliation

To ensure a culture of transparency and safety, CEMA will take disciplinary action against anyone who:

- **Retaliates against individuals** who report SEA in good faith.
- **Obstructs investigations** or attempts to conceal evidence related to an SEA allegation.

- Engages in victim-blaming or harassment of complainants or whistleblowers.

12.5. Record Keeping and Documentation

CEMA will maintain a **secure record of all reported PSEA cases**, including outcomes and actions taken. These records will be:

- **Kept confidential**, with access limited to authorized personnel only.
 - **Used for internal learning and compliance audits.**
 - Shared in anonymized form with donors or oversight bodies when required for accountability and transparency.
-

13. Conclusion

CEMA is dedicated to maintaining a safe, respectful, and dignified environment for all individuals. We take a strong stance against sexual exploitation and abuse and will work tirelessly to prevent such acts from occurring within our organization. All staff, contractors, and partners are expected to fully comply with this policy to uphold CEMA's commitment to protecting the rights and safety of our beneficiaries.

14. Annexes

Annex 1: PSEA Code of Conduct Acknowledgment Form

Centre for Environment and Migration Assistance (CEMA)
Prevention of Sexual Exploitation and Abuse (PSEA) Policy
Code of Conduct Acknowledgment

Full Name: _____

Position/Title: _____

Department/Unit: _____

Supervisor's Name: _____

Date of Commencement: _____

As a staff member, volunteer, consultant, intern, partner, or contractor associated with CEMA, I acknowledge the following:

1. I have received, read, and understood CEMA's Prevention of Sexual Exploitation and Abuse (PSEA) Policy and Code of Conduct.
2. I understand that CEMA has a zero-tolerance policy towards all forms of sexual exploitation, abuse, and harassment.
3. I agree to uphold the highest standards of behavior, dignity, and respect in my interactions with colleagues, community members, beneficiaries, and all individuals associated with CEMA's work.
4. I will not engage in any form of sexual exploitation, abuse, or harassment, including but not limited to:
 - Soliciting or engaging in sexual activity in exchange for goods, services, or protection.
 - Engaging in any sexual activity with children (persons under the age of 18), regardless of local age-of-consent laws or apparent willingness.
 - Using my position of power or trust to coerce another person into sexual activity.
 - Failing to report known or suspected SEA incidents.

5. I commit to reporting any known or suspected incidents of sexual exploitation or abuse, whether committed by CEMA staff, partners, or others, through the designated reporting mechanisms.
6. I understand that any violation of the PSEA Policy or Code of Conduct may result in disciplinary action, including dismissal, termination of contract, legal proceedings, and being reported to relevant authorities.

Signature: _____

Date: _____

Witnessed by (Supervisor/PSEA Focal Point):

Name: _____

Position: _____

Signature: _____

Date: _____

For Internal Use Only:

- Form received and filed by HR: ☐
- Date entered in personnel file: _____

Annex 2: Incident Reporting Form

Centre for Environment and Migration Assistance (CEMA)

Confidential – PSEA Incident Reporting Form

Note: This form is strictly confidential and must be submitted to the PSEA Focal Point or designated senior manager. Completion of this form does not constitute proof of misconduct; it is the first step in initiating a formal review and response.

Section 1: Reporter's Information

(To be completed by the person reporting the incident. Leave blank if the report is anonymous.)

- Full Name: _____
- Position/Title (if applicable): _____
- Organization (if external): _____
- Phone Number: _____
- Email Address: _____
- Relationship to the victim (if applicable): _____
- Date of Report Submission: _____

Section 2: Incident Details

- Date of Incident: _____
- Time of Incident (if known): _____
- Location of Incident (e.g., project site, office): _____
- Type of Incident (check all that apply):
 - ☐ Sexual Exploitation
 - ☐ Sexual Abuse
 - ☐ Sexual Harassment
 - ☐ Child Sexual Abuse
 - ☐ Other (please specify): _____

Section 3: Description of Incident

Please describe what happened in as much detail as possible. Include relevant facts such as who was involved, what occurred, and any actions taken so far.

Section 4: Victim(s) Information (If known)

- Name(s): _____
 - Age (approximate if unknown): _____
 - Gender: _____
 - Affiliation to CEMA (e.g., beneficiary, staff, community member):

 - Has the victim received any medical or psychosocial support?
 - ☐ Yes – Please specify: _____
 - ☐ No
 - ☐ Unknown
-

Section 5: Alleged Perpetrator(s) Information (If known)

- Name(s): _____
 - Position/Title (if affiliated with CEMA): _____
 - Organization: _____
 - Affiliation to CEMA:
 - ☐ Staff
 - ☐ Volunteer
 - ☐ Contractor
 - ☐ Partner
 - ☐ Unknown
 - ☐ Other: _____
-

Section 6: Action Taken

- Was the incident reported to anyone else (e.g., supervisor, police, healthcare provider)?

☐ Yes – Please specify: _____

☐ No

- Immediate action taken by the reporter or witness:

Section 7: Reporter's Signature

- Signature: _____

- Date: _____

Section 8: For Official Use Only (To be completed by CEMA's PSEA Focal Point or Investigator)

- Date Report Received: _____
- Received by (Name and Position): _____
- Confidential Case Number: _____
- Initial Assessment Conducted: ☐ Yes ☐ No
- Date of Referral to Investigation Team: _____
- Investigation Initiated: ☐ Yes ☐ No – If no, provide reason:

- Follow-up Actions Recommended:

- Signature of PSEA Focal Point: _____
 - Date: _____
-

Annex 3: PSEA Investigation Guidelines

Centre for Environment and Migration Assistance (CEMA)

Confidential – Guidelines for Investigating Reports of Sexual Exploitation and Abuse (SEA)

1. Purpose

These guidelines provide a structured and confidential process for investigating allegations of sexual exploitation, abuse, or harassment in connection with CEMA's operations. They aim to ensure fairness, impartiality, and survivor-centered approaches throughout all stages of the investigation.

2. Guiding Principles

- **Confidentiality:** All information related to the complaint and investigation must be kept strictly confidential.
- **Do No Harm:** Investigations must be conducted with sensitivity and prioritize the physical and psychological well-being of the survivor.
- **Impartiality and Objectivity:** Investigations must be free from bias, favoritism, or prejudice.
- **Timeliness:** Investigations should be conducted as quickly as possible without compromising thoroughness.
- **Accountability:** All findings should lead to appropriate action and documentation to improve CEMA's systems.

3. Investigation Team Composition

- The investigation will be led by the **PSEA Focal Point** or a designated senior official trained in PSEA protocols.
 - The team may include an **HR representative, legal advisor**, and, if necessary, an **external investigator**.
 - All investigators must sign a **confidentiality agreement** before commencing their work.
-

4. Investigation Process

Step 1: Initial Assessment

- Verify the credibility and seriousness of the complaint.
- Determine whether interim protective measures are needed (e.g., temporary suspension of the accused).
- Assess risks to the survivor and witnesses and implement immediate safety measures.

Step 2: Planning the Investigation

- Identify objectives, potential sources of evidence, and key witnesses.
- Develop an investigation plan including timelines, responsibilities, and interview strategies.

Step 3: Collecting Evidence

- Gather physical evidence, documentation (emails, reports, messages), and other relevant records.
- Interview the complainant, accused, and any witnesses separately and in a secure, private setting.
- Ensure all interviews are documented and signed.

Step 4: Interview Protocols

- Use trauma-informed techniques.
- Allow survivors to choose a trusted support person to accompany them.
- Avoid leading or suggestive questions.
- Ensure informed consent is obtained prior to any interview or evidence gathering.

Step 5: Analysis of Findings

- Review all testimonies and evidence.
- Determine if the allegation is substantiated, unsubstantiated, or inconclusive based on a "balance of probabilities" standard.
- Document inconsistencies and gaps transparently.

Step 6: Reporting

- Compile a comprehensive investigation report, including:
 - Background and context.
 - Summary of allegations.
 - Methodology used.
 - Evidence collected.
 - Findings and conclusion.
 - Recommendations for action.
 - Submit the final report to the Executive Director and HR for review and decision-making.
-

5. Post-Investigation Actions

- **If Allegation is Substantiated:**
 - Apply disciplinary measures (e.g., termination, legal referral).
 - Provide survivor with access to psychosocial, legal, and medical support.
 - Inform relevant authorities if legally required.

- **If Allegation is Unsubstantiated:**
 - Close the case and inform all parties.
 - Monitor for any retaliation or workplace disruption.
 - Offer support to all parties involved.
-

6. Follow-Up and Monitoring

- Track implementation of recommended actions.
 - Ensure ongoing protection and support for the complainant.
 - Conduct a debriefing with investigation team to improve future procedures.
-

7. Documentation and Recordkeeping

- All documentation must be stored in a secure, access-controlled location.
 - Only authorized personnel may access investigation records.
 - Retain records in accordance with CEMA's data protection policies and applicable legal requirements.
-

8. Safeguards Against Retaliation

CEMA strictly prohibits retaliation against any individual who reports SEA in good faith or participates in an investigation. Anyone found guilty of retaliatory behavior will face disciplinary measures.

Centre for Environment and Migration Assistance (CEMA)

Confidential – Ensuring Timely, Safe, and Survivor-Centered Support

1. Purpose

This annex outlines the procedures and support systems CEMA has in place to provide immediate, safe, and confidential assistance to survivors of Sexual Exploitation and Abuse (SEA). It ensures that victims receive timely care and are referred to appropriate services that respect their dignity, rights, and choices.

2. Guiding Principles

- **Survivor-Centered Approach:** All assistance and referrals prioritize the needs, safety, and informed consent of the survivor.
 - **Confidentiality:** Information related to the survivor is shared only on a strict need-to-know basis and with their consent.
 - **Respect and Dignity:** All survivors will be treated with compassion, respect, and without discrimination.
 - **Non-Retaliation:** Survivors, witnesses, and whistleblowers are protected from retaliation or further harm.
-

3. Immediate Actions by CEMA Staff

When a SEA incident is reported:

1. **Ensure Safety:** Confirm the immediate safety and well-being of the survivor. If they are in danger, initiate urgent protection measures (e.g., relocation, medical evacuation).
2. **Listen and Reassure:** Receive the disclosure in a non-judgmental and supportive manner. Do not pressure the survivor to disclose more than they wish.

3. **Inform on Options:** Clearly explain available assistance services and ask for the survivor's informed consent before taking any action.
 4. **Activate the Referral Pathway:** With consent, refer the survivor to appropriate support services as outlined below.
-

4. Types of Victim Assistance

Service	Description
Medical Assistance	Emergency care, HIV post-exposure prophylaxis (PEP), pregnancy prevention, STI screening and treatment.
Psychosocial Support	Access to trained counselors or mental health services for emotional recovery.
Legal Support	Information on legal rights, support for filing complaints or pressing charges.
Protection Services	Safe shelters, safety planning, and protection from further harm or retaliation.
Livelihood/Other Aid	Referral to social or economic services if the survivor is left vulnerable.

5. Referral Pathway

Step 1: Immediate Support

- CEMA PSEA Focal Point conducts an initial assessment (within 24 hours).
- Survivor is offered urgent medical and psychosocial support.

Step 2: Consent and Referral

- Survivor provides written or verbal consent for referral.
- CEMA refers the survivor to appropriate local service providers using a confidential and documented process.

Step 3: Ongoing Case Management

- CEMA maintains regular, survivor-approved follow-ups to ensure continuous support and safety.
- Referrals are tracked to monitor that services have been accessed.

6. Key Local Referral Contacts (example – customizable by region)

Service	Organization/Facility	Contact Info
Medical	Local Government Hospital (e.g., Yumbe District Hospital)	+256 XXX XXX XXX
Psychosocial	War Child / Transcultural Psychosocial Organization (TPO)	+256 XXX XXX XXX
Legal	Uganda Human Rights Commission	+256 XXX XXX XXX
Shelter	Uganda Red Cross Society Shelter Services	+256 XXX XXX XXX
Police	Uganda Police Child and Family Protection Unit	+256 XXX XXX XXX

Note: CEMA will maintain updated referral directories for each project location.

7. Documentation and Confidentiality

- All survivor information will be securely stored, anonymized where necessary, and accessed only by designated staff.
- Survivor consent will be documented before making any referral.
- No personal details will be shared without survivor approval, unless required by Ugandan law.

8. Capacity Building and Coordination

- CEMA will train staff on providing first-line support using the **LIVES approach** (Listen, Inquire, Validate, Enhance safety, Support).

- CEMA will participate in inter-agency coordination groups (e.g., GBV working groups) to ensure up-to-date referral pathways and collaboration.

9. Feedback and Continuous Improvement

- Survivors will be invited (voluntarily and confidentially) to give feedback on services received.
- Lessons learned will be used to improve referral pathways and survivor care.

Annex 5: Roles and Responsibilities Matrix

Centre for Environment and Migration Assistance (CEMA)

Prevention of Sexual Exploitation and Abuse (PSEA)

This matrix outlines the roles and responsibilities of CEMA staff, management, partners, and other stakeholders in implementing, monitoring, and enforcing the PSEA Policy. It ensures that all parties understand their obligations and contribute to creating a safe and respectful environment.

Role	Key Responsibilities	Reporting Lines
Board of Directors	- Provide strategic oversight of PSEA policy implementation. - Approve policy updates and organizational responses to major SEA incidents.	Reports to regulatory authorities and donors as needed.
Executive Director	- Ensure organizational commitment to PSEA. - Allocate resources for implementation. - Lead crisis response in SEA cases. - Report high-level incidents to the Board and donors.	Reports to the Board of Directors.
Senior Management Team	- Integrate PSEA in operational planning and management. - Supervise implementation in	Reports to the Executive Director.

	respective departments. - Support investigations and disciplinary measures.	
PSEA Focal Point	- Coordinate all PSEA activities. - Lead awareness campaigns and training. - Receive, record, and manage SEA complaints. - Liaise with survivors, service providers, and investigation teams. - Report regularly to senior management.	Reports to the Executive Director or assigned SMT member.
HR Manager/HR Department	- Incorporate PSEA in recruitment, orientation, and performance management. - Ensure all staff sign the Code of Conduct. - Manage disciplinary procedures for PSEA violations. - Maintain confidential personnel records related to SEA cases.	Reports to the Executive Director.
Program/Project Managers	- Integrate PSEA in project design and implementation. - Train team members on community-based complaint mechanisms. - Ensure partners and contractors comply with PSEA standards. - Coordinate referrals and community reporting channels.	Reports to Senior Management.
MEAL (Monitoring, Evaluation, Accountability & Learning) Team	- Track PSEA indicators and complaints. - Support community feedback mechanisms. - Ensure learning from SEA cases is documented and used to improve systems.	Reports to Senior Management and PSEA Focal Point.
All Staff and Volunteers	- Read, understand, and sign the PSEA Code of Conduct. - Participate	Report to immediate

	in training and refresher sessions. - Report suspected SEA violations through the designated channels. - Treat all people with dignity and respect.	supervisors or the PSEA Focal Point.
Partners and Contractors	- Commit to and sign CEMA's PSEA compliance agreement. - Train their staff and volunteers on PSEA. - Ensure community accountability in their activities. - Report incidents or concerns immediately to CEMA.	Report to CEMA Project Manager and PSEA Focal Point.
Community Leaders & Focal Persons	- Act as trusted intermediaries for community members. - Promote awareness of PSEA and reporting options. - Refer complaints to appropriate channels.	Report to Project Managers or designated Community Accountability Officers.

Notes:

- All roles are required to uphold confidentiality and protect whistleblowers and survivors.
- CEMA will review and update this matrix annually to reflect any changes in staffing, roles, or organizational structure.
- In emergencies or urgent situations, the chain of command may be adjusted to ensure timely response and survivor safety.

Annex 6: PSEA Training and Awareness Plan

Centre for Environment and Migration Assistance (CEMA)
Prevention of Sexual Exploitation and Abuse (PSEA) Policy

This plan outlines the training and awareness-raising activities CEMA will undertake to ensure all employees, contractors, volunteers, partners, and beneficiaries understand the PSEA policy and their roles in preventing and responding to sexual exploitation and abuse (SEA). The goal is to create an informed workforce and community, capable of identifying, reporting, and preventing SEA incidents in a timely and effective manner.

1. Training Objectives

- **Ensure understanding** of CEMA's PSEA policy and the behaviors it prohibits.
 - **Equip staff, contractors, and partners** with the knowledge and skills to recognize, prevent, and report SEA incidents.
 - **Promote a culture of accountability** and respect for the rights and dignity of all beneficiaries.
 - **Clarify roles and responsibilities** regarding PSEA for all personnel.
 - **Provide guidance** on handling sensitive issues related to SEA with respect to confidentiality, survivor safety, and legal considerations.
-

2. Target Audience

- **All CEMA Employees:** Permanent, temporary, and contract staff members.
 - **Volunteers, Consultants, and Contractors:** Individuals working with or for CEMA, including those employed in field locations or specific project sites.
 - **Partners and Stakeholders:** NGOs, governmental organizations, donors, and other collaborators working with CEMA.
 - **Beneficiaries:** Refugees, migrants, and vulnerable populations served by CEMA's programs.
-

3. Key Training Topics

1. Overview of PSEA

- Definitions of sexual exploitation, sexual abuse, and sexual harassment.
- The importance of creating a safe and respectful environment.
- CEMA's zero-tolerance approach to SEA.

2. CEMA's PSEA Policy and Code of Conduct

- Detailed explanation of CEMA's PSEA policy, including roles, responsibilities, and prohibited behaviors.
- Code of Conduct acknowledgment and expectations for staff, volunteers, and partners.

3. Identification of SEA Incidents

- Recognizing different forms of sexual exploitation and abuse.
- Identifying the signs and behaviors that may indicate SEA.
- Specific risk factors for vulnerable groups, including children and persons with disabilities.

4. Reporting Mechanisms and Procedures

- Clear and accessible reporting channels (hotline, email, reporting systems).
- How to report SEA incidents confidentially and safely.
- Protection of whistleblowers and the confidentiality of the reporting process.
- How staff and volunteers can assist beneficiaries in reporting SEA.

5. Investigation and Response to SEA

- Steps involved in investigating and addressing SEA allegations.
- Roles of staff and management in the investigation process.
- Disciplinary actions and legal ramifications for perpetrators.
- Providing support to survivors of SEA, including psychological, legal, and medical referrals.

6. Preventative Measures

- Best practices for preventing SEA in project design and community engagement.
- How staff can prevent abuse of power in their roles.
- Strategies for fostering a protective environment for beneficiaries.

7. PSEA in Community Engagement

- Raising awareness in the communities served by CEMA.
 - Engaging community leaders in PSEA efforts.
 - Ensuring that beneficiaries understand their rights and how to report incidents of SEA.
-

4. Training Delivery Methods

- **In-Person Workshops:** Interactive sessions for staff, volunteers, and partners to foster discussion and a deeper understanding of PSEA concepts.
 - **Online Training Modules:** For remote staff, contractors, and partners who may not be able to attend in-person sessions.
 - **Case Studies and Role-Playing:** Scenarios that simulate real-life SEA incidents, allowing participants to practice responses and reporting mechanisms.
 - **Workplace Posters and Visuals:** Informational materials displayed in offices and field locations to raise awareness about PSEA policies.
 - **Peer-Led Training:** Senior staff or PSEA focal points leading training sessions for new employees or staff working on specific projects.
 - **Beneficiary Awareness Sessions:** Community-based awareness campaigns to inform beneficiaries about their rights and reporting mechanisms.
-

5. Training Schedule

- **Induction Training:** All new staff, volunteers, contractors, and partners will undergo mandatory PSEA induction training within one month of joining CEMA.
- **Annual Refresher Training:** All staff, volunteers, contractors, and partners will participate in annual PSEA refresher courses to reinforce the policy, address new challenges, and share updates.
- **Community Awareness Campaigns:** Conducted regularly in refugee camps, local communities, and project areas to educate beneficiaries about SEA and reporting options.

6. Evaluation and Monitoring

- **Training Feedback:** All participants will complete a feedback form at the end of each training session to evaluate the relevance, content, and effectiveness of the training.
 - **Pre- and Post-Training Assessments:** Knowledge assessments before and after training sessions to measure participants' understanding of key concepts.
 - **Ongoing Monitoring:** The PSEA focal point will conduct regular reviews to ensure that staff and partners remain compliant with the PSEA policy and that training is being effectively applied in the field.
 - **Annual Report:** An annual review of PSEA training activities will be conducted, and findings will be shared with senior management and donors to ensure continuous improvement.
-

7. Roles and Responsibilities for Training Implementation

- **PSEA Focal Point:**
 - Develops and coordinates the overall training plan and schedule.
 - Monitors the effectiveness of training programs and makes improvements based on feedback.
 - Liaises with external trainers or facilitators, if required.
 - Provides ongoing support to staff and volunteers on PSEA-related queries.
- **Human Resources Department:**
 - Ensures that new employees and partners sign the Code of Conduct and undergo mandatory PSEA training during induction.
 - Supports the logistical organization of training sessions.
 - Keeps records of all completed training sessions.
- **Program/Project Managers:**
 - Ensure their teams receive adequate PSEA training, including project-specific considerations.

- Provide support for community-based PSEA awareness campaigns.
 - **Senior Management Team:**
 - Demonstrates commitment to PSEA by attending training sessions and providing leadership on the issue.
 - Support the allocation of resources for training programs.
-

8. Resources Required

- **Training Materials:** Printed materials, presentations, case studies, role-playing scripts, and multimedia tools.
 - **Facilitators/Trainers:** Experienced internal or external trainers with expertise in PSEA and safeguarding.
 - **Training Venues:** Suitable venues for in-person workshops, or online platforms for virtual training.
 - **Monitoring Tools:** Feedback forms, assessments, and reporting systems to track progress.
-

9. Reporting and Accountability

- **PSEA Focal Point** will report on training progress and impact during quarterly management meetings.
 - Annual PSEA training outcomes will be included in CEMA's donor reports.
 - Feedback from training participants will inform future iterations of the plan.
-

This **PSEA Training and Awareness Plan** ensures that CEMA's staff, volunteers, partners, and beneficiaries are well-equipped to recognize and prevent sexual exploitation and abuse. Regular training and awareness-raising activities will create a safer environment for all those engaged with CEMA's programs.

Annex 7: Community Feedback and Complaints Mechanism Guidelines

Centre for Environment and Migration Assistance (CEMA)

Prevention of Sexual Exploitation and Abuse (PSEA) Policy

These guidelines outline the process for handling community feedback and complaints related to sexual exploitation, abuse, and harassment (SEA) within CEMA's programs. The purpose is to ensure that beneficiaries, staff, and community members have accessible, confidential, and effective channels for reporting concerns and grievances while ensuring that CEMA takes immediate action to address and resolve any SEA-related incidents.

1. Objectives of the Community Feedback and Complaints Mechanism (CFCM)

The Community Feedback and Complaints Mechanism (CFCM) aims to:

- Provide a safe, accessible, and confidential channel for community members, beneficiaries, and staff to report incidents of sexual exploitation, abuse, or harassment.
 - Ensure that all complaints are handled in a fair, impartial, and timely manner.
 - Establish trust between CEMA and the communities it serves, assuring individuals that their concerns will be taken seriously and acted upon.
 - Prevent and address incidents of SEA through clear actions and follow-up processes.
 - Empower communities by giving them a voice in CEMA's operations and by promoting accountability.
-

2. Key Principles

- **Confidentiality:** All complaints and feedback will be treated with the utmost confidentiality. Personal details of the complainant and the details of the incident will not be disclosed without explicit consent, except as required for investigation or legal purposes.
 - **Accessibility:** The feedback and complaints mechanisms will be designed to ensure that all community members, including those with disabilities and marginalized groups, can easily access the system.
 - **Non-Retaliation:** There will be zero tolerance for retaliation against individuals who report incidents of SEA or provide feedback. Retaliation will be treated as a separate violation under CEMA's PSEA policy.
 - **Timeliness:** Complaints and feedback will be addressed promptly. Investigations will be conducted in a timely manner, and complainants will be informed of the progress and outcomes.
 - **Transparency:** CEMA will be transparent about the processes and steps involved in the complaints handling and investigation procedures. While confidentiality must be maintained, the complainant will be informed about the status of the investigation.
-

3. Reporting Channels

CEMA will ensure that beneficiaries, staff, and community members have multiple ways to report complaints and feedback regarding SEA incidents:

1. **Dedicated PSEA Hotline**
A confidential phone line available 24/7 for reporting SEA-related issues.
2. **Email and Online Reporting System**
A dedicated email address and secure online platform to allow for written complaints, which will also be accessible to individuals in remote locations.
3. **In-Person Reporting**
Community members can report concerns in person to the designated PSEA focal point or senior staff. Confidentiality and sensitivity will be ensured during these interactions.

4. Community-Based Reporting

Community-based committees or focal points (e.g., community leaders, health workers) will be trained to receive and report complaints. This is particularly useful in rural or refugee settings where access to centralized reporting mechanisms may be limited.

5. Drop Boxes

Secure, locked drop boxes will be placed in various community locations (e.g., CEMA offices, field locations, partner facilities) where individuals can anonymously submit complaints.

6. Third-Party Reporting Mechanisms

In cases where complainants may feel uncomfortable approaching CEMA directly, third-party organizations (e.g., partner NGOs or community organizations) will be available to receive complaints on behalf of CEMA.

4. Feedback and Complaints Process

The process for handling complaints and feedback is designed to ensure fairness, impartiality, and prompt action:

1. Receiving the Complaint

- Complaints may be received in person, through the hotline, email, online platform, or anonymous drop boxes.
- All complaints will be acknowledged within 48 hours of receipt to confirm that they are being processed.

2. Initial Assessment

- The PSEA focal point or a designated team member will review the complaint to determine its nature, severity, and potential for immediate action.
- Urgent cases (e.g., immediate harm, risk of retaliation, or ongoing abuse) will be prioritized for immediate investigation and response.

3. Investigation and Action

- If the complaint concerns sexual exploitation, abuse, or harassment, the designated investigation team will carry out a thorough, impartial investigation.
- The PSEA focal point will inform the complainant about the next steps in the investigation, including timelines for resolution.
- Victims will be offered support services, such as psychosocial counseling, legal aid, and medical assistance, as needed.

4. Resolution and Response

- Once the investigation is complete, the findings will be shared with the complainant (where appropriate) and other relevant stakeholders.
- If the complaint is substantiated, CEMA will take the necessary disciplinary actions against the perpetrator(s) in line with the PSEA policy.
- If the complaint is not substantiated, CEMA will provide feedback to the complainant explaining the reasons for the conclusion.

5. Closing the Complaint

- Once the matter has been resolved, the complaint will be officially closed. The complainant will be informed about the outcome, and any necessary follow-up actions will be taken (e.g., support for the victim, training for staff, or systemic changes).

5. Roles and Responsibilities

1. PSEA Focal Point

- Ensures the smooth operation of the feedback and complaints mechanism.
- Coordinates the investigation and resolution of complaints.
- Liaises with the community and ensures they are informed about the outcomes of their complaints.

2. Field and Program Managers

- Ensure that the complaints mechanism is accessible and known to all community members.

- Train staff to handle complaints sensitively and in accordance with the PSEA policy.
- Follow up on complaints to ensure proper actions are taken.

3. Community Outreach Teams

- Raise awareness of the complaints mechanism within communities.
- Provide information on how to use the mechanism and encourage individuals to report any concerns.

4. HR and Legal Teams

- Ensure that complaints related to staff and contractors are addressed according to CEMA's disciplinary procedures.
- Provide legal advice when necessary, particularly in cases where legal action may be required.

6. Protection and Support for Complainants

1. Victim Support

- CEMA will ensure that all victims of SEA receive the necessary support services, including access to counseling, medical services, and legal assistance.
- Survivors will be given information about their rights and options for legal action.

2. Confidentiality and Non-Retaliation

- CEMA will protect the identity and confidentiality of complainants throughout the process.
- Retaliation against individuals who report complaints will not be tolerated. Any such retaliation will be dealt with severely according to CEMA's disciplinary procedures.

3. Referral Pathways

- CEMA will establish clear referral pathways for individuals who need further support, ensuring access to both internal and external services.
-

7. Monitoring and Evaluation

CEMA will regularly monitor the effectiveness of the Community Feedback and Complaints Mechanism through:

- **Regular Audits:** Assessing the responsiveness and fairness of the system.
 - **Tracking and Reporting:** Keeping detailed records of all complaints received, the resolution process, and outcomes.
 - **Annual Review:** Reviewing the system's performance and making adjustments as needed to ensure its effectiveness and accessibility.
-

8. Awareness Raising and Outreach

- **Community Awareness:** Information about the feedback and complaints mechanism will be disseminated in all project areas. This will include posters, leaflets, community meetings, and engagement with local leaders.
 - **Beneficiary Education:** Beneficiaries will be informed during initial interactions with CEMA about their right to report any form of exploitation, abuse, or harassment, and the methods available for doing so.
-

Prepared by:
Norman Seguya, Human Resource Director



Reviewed by:
Abas Ruhweza, Executive Director



Approved by:
Rev. Moses Atuhairu, Board Chairperson

Not a