



# **MAZAZEF'S PROTECTION FROM SEXUAL EXPLOITATION, ABUSE, AND HARASSMENT POLICY (PSEAH)**

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## 1. SCOPE OF POLICY

The standards outlined in this Policy are applicable to all individuals associated with Ma3azef, including paid and unpaid staff members, freelancers, interns, board members, partnering entities, and hired consultants (hereinafter referred to as “Ma3azef personnel”).

This Policy extends to Ma3azef’s virtual and physical workspaces, any and all external events Ma3azef is involved in, work-related-travels, internal events and networking sessions, and all instances of representing Ma3azef in any capacity. This policy is to be observed at all times during any work-related activities.

Ma3azef personnel shall comply with this Policy in all countries where Ma3azef operates or its representatives undertake work-related visits. Ma3azef does not only aim to abide by legal requirements, but also seeks to establish a safe and equitable working environment for its staff and collaborators.

## 2. POLICY STATEMENT

Ma3azef has zero tolerance for all forms of sexual exploitation, abuse, and harassment. Issues pertaining to PSEAH are taken very seriously and Ma3azef is committed to remedy any harm, when possible, by pursuing available legal avenues.

## 3. RELATED POLICIES

Ma3azef’s HR Policy, with a special focus on the provisions of Code of Conduct. You can access the policy through Ma3azef’s website, under the Institutional Reports Section, within the *Policy Kit* download links ( <https://ma3azef.com/institutional-resources/> ). For employees, consultants, and service providers, the policies are found annexed to all contracts and service agreements.

## 4. DEFINITIONS OF SEXUAL EXPLOITATION, ABUSE, AND HARASSMENT

**The key difference between Sexual Exploitation or Abuse (SEA) and Sexual Harassment (SH) is the victim:** in the case of SEA, the victim is a person of concern, or a beneficiary from our programs (students, trainees, interns..etc). In the case of SH, the victim is a peer or fellow worker or consultant within Ma3azef’s network, whether working with Ma3azef or with another agency or partner organization collaborating with Ma3azef on a joint activity or program.<sup>1</sup>

Ma3azef discourages romantic or sexual relationships between its employees and members of partner organizations due to inherent power dynamics. Employees involved in such relationships are advised to report them to their respective supervisors to prevent potential conflicts of interest and managerial risks.

#### 4.1. SH (Sexual Harassment) <sup>2</sup>

**Sexual harassment** affects personnel and is defined as any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation. When such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. Sexual harassment may occur in the workplace or in connection with work. While typically involving a pattern of conduct, sexual harassment may take the form of a single incident. In assessing whether the conduct causes offense, the perspective of the victim shall be considered.

Sexual harassment can take various forms – from words and gestures to physical contact of a sexual nature.

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<sup>1</sup> (UNHCR, Tackling Sexual Exploitation, Abuse, and Harassment 2022).

<sup>2</sup> (UNHCR, Tackling Sexual Exploitation, Abuse, and Harassment 2022), (WHO, Policy Directive on Protection from sexual exploitation and sexual abuse (SEA), 2021).

## 4.2. SEA (Sexual Exploitation and Abuse) <sup>3</sup>

**Sexual exploitation:** Actual or attempted abuse of a position of vulnerability, power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual exploitation is defined as the misuse of a vulnerable position, an imbalance of power, or breach of trust for personal sexual purposes. Ma3azef explicitly prohibits the exchange of money, employment, goods, assistance, or services for sexual acts, including any form of demeaning, degrading, or exploitative behavior, irrespective of the legality of such activities (e.g. sex work) in the country of operation.

**Sexual abuse:** Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual abuse encompasses both the actual and threatened physical intrusion of a sexual nature, including inappropriate touching, accomplished by force or in situations of inequality or coercion. Ma3azef strictly prohibits engaging in any form of sexual activity with individuals under the age of 18, regardless of the local age of consent. Mistakenly believing a person's age does not serve as a valid defense.

## 5. POLICY PRINCIPLES <sup>4 5</sup>

### 5.1. Shared Responsibility

All Ma3azef employees and affiliated personnel bear the responsibility of fostering an environment that prevents sexual misconduct in its various forms and actively supports the implementation of this policy.

Ma3azef shall create and maintain an environment that prevents SEAH and promote the implementation of the company's code of conduct found within Ma3azef's HR policy. Managers at all levels have particular responsibilities to support and develop systems that maintain a safe environment.

Ma3azef staff have a duty to report in a responsible and ethical fashion any instance where they may suspect or detect signs of SEAH.

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<sup>3</sup> ((UNHCR, Tackling Sexual Exploitation, Abuse, and Harassment 2022), (WHO, Policy Directive on Protection from sexual exploitation and sexual abuse (SEA), 2021).

<sup>4</sup> (Australian Council for International Development, Guidance for the development of a Prevention of Sexual Exploitation, Abuse and Harassment Policy, 2020)

<sup>5</sup> International Media Support, IMS Policy of Prevention Against Sexual Exploitation, Abuse, and Harassment, 2020)

## 5.2. HR Considerations

Ma3azef will conduct reference checks during the recruitment of staff. Consent will be sought from the successful applicant to request two references, including one from their most recent employer or educational institution.

Additionally, Ma3azef will include an assessment of staff's adherence to the Ma3azef HR policy and the code of conduct provisions present within and the PSEAH policy within performance management processes and appraisals.

## 5.3. Accountability and Commitment to Transparency

In order to maintain our commitment to transparency and accountability measures, Ma3azef is committed to sharing relevant information with donors and other formal stakeholders. This includes providing updates on the number of received complaints, the measures taken to address them, and the outcomes of investigations. Such information will be shared with donors when a documented breach of the PSEAH policy occurs, while ensuring that personal information remains confidential.

## 5.4. Complainant Centered Approach

Ma3azef stands by survivors, victims, and complaints of all forms of sexual misconduct and puts the safety and wellbeing of those affected in the center of its response. Ma3azef recognizes that understanding of what is perceived as unwelcome sexual behavior is both contextual and individual.

Sexual exploitation, abuse, and harassment constitute acts of serious misconduct and are therefore grounds for disciplinary measures, termination of employment, and legal proceedings.

## 5.5. Confidentiality, No Harassment and Non-retaliation

All reports of wrongful conduct within Ma3azef will be treated with utmost seriousness. Every effort will be made to maintain confidentiality while ensuring a thorough investigation. Upon receipt of a report, an initial investigation will be promptly conducted to assess its seriousness and determine the need for further investigation.

We are committed to taking reporting of wrongful conduct seriously and providing protection to individuals who raise concerns in good faith. Ma3azef maintains a strict non-retaliation policy, ensuring that no employee will face harassment or adverse consequences as a result of their reporting.

Maintaining confidentiality holds utmost significance for Ma3azef as it serves to protect the complainant, individuals of concern, and other witnesses. Breaches of confidentiality undermine the effectiveness of Ma3azef's safeguarding mechanisms. Information pertaining to SEAH allegations and the identities of those involved and their personal information will only be shared with relevant parties involved in incident management or fulfilling their duty of care on a "need to know basis" complying with the applicable data protection laws and regulations.

Ma3azef upholds the principle that all staff members, partners, and associated individuals should feel empowered to voice concerns without fear of retaliation or unfair treatment as a result of their complaints. Ma3azef is committed to taking appropriate action against any staff or representatives who engage in or attempt retaliatory measures (e.g. intimidation or threats) against complainants, survivors, witnesses, or any other individuals involved or believed to be involved in the incident management process. Such actions by staff members will be subjected to disciplinary procedures, including the possibility of employment termination.

## 5.6. Fostering Safe Working Spaces and Culture Through Awareness and Training

Ma3azef is dedicated to creating a work environment and culture that is free from any form of sexual misconduct, aiming to prioritize the well-being and safety of all staff members and affiliated personnel involved in Ma3azef's activities.

Ma3azef's codes of conduct (found in the HR policy) and the Policy on Prevention of Sexual Exploitation, Abuse, and Harassment (PSEAH) are to be familiar to all staff members, consultants, advisors, and relevant personnel. Ma3azef's management has the responsibility to ensure that these policies are effectively communicated to new staff members

during their induction process. Staff members are required to acknowledge their understanding of these policies by signing and dating them upon accepting their position.

Ma3azef's management is obligated to handle reports and concerns related to sexual misconduct, and they should provide guidance to staff members and other individuals involved in incidents concerning sexual exploitation, abuse, and harassment (SEAH).

## 6. INCIDENT REPORTING

### To facilitate accessible reporting of SEAH:

- Any staff member who becomes aware of suspicions of misconduct must, to the best of their abilities, report the matter within 48 hours to the designated safeguarding focal point, who is the Director of Operations.
- Oral complaints are permitted, however they must be followed by written formal communication via email to Ma3azef's Executive Directors (Director of Operations and Director of Content).
- Complainants can send an email to ([Feedback@Ma3azef.com](mailto:Feedback@Ma3azef.com)) with the filled out PSEAH reporting form attached in ANNEX 1 and 2 below.
- If the complainant wishes to submit via our incident reporting portal, you can visit the incident reporting tool on Ma3azef's website found here <https://ma3azef.com/institutional-resources/>.

Any individual can raise concerns or lodge complaints with Ma3azef's management regarding incidents of sexual exploitation, abuse, and harassment (SEAH) involving staff members and associated personnel who fall under the scope of this policy, along with external parties, event attendees, and any/all collaborators.

Any complaint or allegation of abuse, exploitation or harassment shall be submitted in writing to warrant and ensure effective implementation of Policy. Any oral allegation, gossip, or abusive recourse to public social media is not encouraged and does not enable Ma3azef to investigate and remedy any harm that might have occurred.

The complainant is required to identify clearly the accused individual and the injured party by name. Such disclosure helps Ma3azef to thoroughly assess and investigate the situation to the best of its abilities.

Concerns regarding sexual misconduct involving Ma3azef staff or associated personnel may also come to the organization's attention through media, social media, or rumors. In such instances, any staff member who becomes aware of information through these public channels is responsible to promptly relay the information to the safeguarding focal point within 48 hours of being informed.



## 6.1. RESPONDING TO INCIDENT REPORTS

Every complaint will be treated with utmost seriousness, and the investigative procedure will be conducted in a fair, sensitive, and respectful manner, ensuring the rights and protection of all individuals involved are upheld.

### 6.1.1. Internal Management Process

As soon as a case is logged in the Ma3azef system (via direct email or official incident reporting mechanism), the safeguarding focal point calls the safeguarding committee to convene and review the allegations. Confirmation of receipt by Ma3azef's safeguarding committee must be within 72 hours after the incident has been formally reported.

Full cooperation with any Ma3azef authorized investigation committee is mandatory.

The safeguarding committee will aim to formalize conclusions of the investigation within 10 working days of confirming the receipt of the formal complaint made. However, this period is renewable at the request of the committee.

### 6.1.2. Referral to Other Organizations

Investigations should primarily be conducted by the organization in which the Subject of Concern is employed or contracted. Ma3azef will refer concerns or complaints to other organizations through formal mechanisms, with the support of legal counsel.

If the Subject of Concern reports to both Ma3azef and another organization in joint programs wherein both organizations are mutually funded by the same donor or collaborating on an activity funded by multiple donors, Ma3azef will always conduct investigations, even if it requires coordination with partners. Information about the outcome of an investigation will be shared between the concerned organizations, with strong consideration for the confidentiality and protection of the parties involved.

### 6.1.3. Joint Programs with Partners

It is imperative for Ma3azef partners to fully adhere to the Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH) policy. These obligations shall be explicitly stated in all partner contracts. Failure to comply with these policies may result in the termination of partnership agreements or contracts.

Ma3azef shall ensure that partner organizations are aware of the Ma3azef Code of Conduct (included within Ma3azef's HR Policy) and PSEAH Policy. Prior to entering into a partnership, Ma3azef shall assess the organization's capacity to comply with Ma3azef's policies and guidelines in their entirety.

It is vital for any concerns or complaints regarding partner staff members or associated personnel to be expeditiously reported within 48 hours to the Ma3azef safeguarding focal point. In the event that Ma3azef receives any such complaint concerning a member of staff or associated personnel at a partner organization, Ma3azef will collaborate closely with the partner to ensure a prompt and appropriate response. In cases of exceptional circumstances, Ma3azef may take the necessary steps to initiate an investigation against staff members or associated personnel of partner organizations.

Should there be reasonable grounds to suspect that a complaint has been mishandled or inadequately addressed by a partner, Ma3azef reserves the right to take appropriate actions, which may include withdrawing funding and/or formally reporting the partner organization to the funding body. In certain instances, termination of the partnership may also be considered as a necessary measure to uphold safeguarding standards.

## 6.2. ROLES AND RESPONSIBILITIES

### 6.2.1. Safeguarding Focal Point

Ma3azef's designated focal point for safeguarding is the Director of Operations (carrying all HR responsibilities). Any incident reporting must be immediately communicated by the Director of Operations, to the safeguarding committee. Following which the safeguarding committee will pursue needed investigation abiding by the procedures set forth in this policy.

Safeguarding focal point should assist the organization with advice related to prevention of sexual misconduct and safeguarding.

## 6.2.2. Safeguarding Committee

The Safeguarding committee is composed of Ma3azef's executive directors (Director of Content and Director of Operations), two BoD Directors selected based on their relevant expertise, Ma3azef's legal counsel, and finally one annually delegated representative from middle management with relevant experience. This committee takes decisions on the outcome and actions to follow an investigation.

The Safeguarding Committee meets on a need-basis to handle any PSEAH reporting.

The committee will hold accountability up until the point of reverting the incident to an extra-institutional judicial body - the committee is limited to responsibilities within the scope of the organization only.

## 6.2.3. Staff and Associated Personnel:

Every individual staff member and associated personnel bears the responsibility for their own conduct and must ensure compliance with Ma3azef's Code of Conduct (included within Ma3azef's HR Policy) and PSEAH policy. It is expected that all staff members and associated personnel actively contribute, to the best of their abilities, towards cultivating a work environment and organizational culture at Ma3azef that effectively prevents and addresses instances of sexual misconduct. In accordance with their obligations, staff members are required to promptly report any suspicion of sexual exploitation and abuse through established reporting mechanisms and demonstrate full cooperation in any SEAH investigation.

## 6.2.4. Director of Operations and Heads of Departments:

Ma3azef's Director of Operations and heads of departments are responsible for informing all new staff of Ma3azef's Code of conduct and PSEAH Policy and ensuring that all staff members in their respective department/unit are kept informed about any updates or changes in existing or new policies. It is the duty of managers to ensure that the work environment and culture within their department/unit actively discourage and prevent sexual misconduct, and that any concerns or complaints raised within their department/unit are handled in accordance with Ma3azef's policies and guidelines.

Heads of Department and Heads of Units have an obligation to stay informed about Ma3azef's PSEAH policies and safeguarding mechanisms. They are also responsible for providing accurate and appropriate information and guidance to any complainant, subject of concern, or witness who seeks their advice.

## 6.2.5. Ma3azef Executive Directors:

Ma3azef Executive Directors (Content and Operations) shall ensure that partner organizations are aware of the Ma3azef Code of Conduct and PSEAH Policy. Prior to entering into a partnership, Ma3azef shall assess the organization's capacity to comply with Ma3azef's policies and guidelines in their entirety.

## 6.2.6. Ma3azef Board of Directors:

While two members of the BoD will be included formally as focal points within the safeguarding committee, the BoD in its entirety shall consult, advise, and assist Ma3azef's safeguarding committee in properly and promptly addressing any safeguarding concerns or reports of misconduct within in a reasonable period of time starting from the receipt in writing of the incident report.

## ANNEX 1- Incident Reporting Form for Submission (Employees):

In accordance with Ma3azef's PSEAH Policy, it is mandatory for every Ma3azef employee to promptly complete and submit this report upon experiencing or witnessing an incident of SEAH. To the best of the employee's abilities, the submission must take place immediately, within 48 hours of any suspected or actual incident being reported. Confirmation of receipt of complaint by Ma3azef's safeguarding committee must be within 72 hours after the incident has been formally reported via email to [feedback@ma3azef.com](mailto:feedback@ma3azef.com) or via the online incident reporting page found here ( <https://ma3azef.com/institutional-resources/> ) Irrespective of the SEAH incident's type, timeframe, accused individual or affected person, this form must be submitted prior to commencing an investigation. The safeguarding committee will aim to formalize conclusions of the investigation within 10 working days of confirming the receipt of the formal complaint made. However, this period is renewable at the request of the committee.

The complainant is required to identify the alleged accused individual and the injured party by name, when possible. This is necessary to enable Ma3azef to thoroughly assess and investigate the situation to the best of their abilities. Such disclosure helps Ma3azef to thoroughly assess and investigate the situation to the best of its abilities.

When completing the report, concise responses consisting of one or two sentences for each item are sufficient for the purpose of this initial report. In cases where the answers are not yet known at the time of submission, it is acceptable to indicate "Not known yet".

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### Please fill in the following form:

1. Subject (what is the type of allegation?)
2. Name of individual submitting the report
3. Email of individual submitting the report
4. Project or event under which the misconduct took place:
5. Date of discovery (when did you find out?)
6. Date (or estimated date/time frame) of incident/s (when did it happen?)
7. Method of discovery (How did it happen?)
8. Location of incident (Where did it happen?)
9. Details of alleged incident (including names of victims or aggressors)
10. Have you taken any initial action?
11. Anything else to share?

## ANNEX 2- Incident Reporting Form for Submission (Public Form):

In accordance with Ma3azef's Protection against Sexual Exploitation, Abuse, and Harassment Policy (PSEAH), individuals must complete and submit this report upon experiencing or witnessing an incident of SEAH.

- Confirmation of receipt of complaint by Ma3azef's safeguarding committee must be within 72 hours after the incident has been formally reported via email to [feedback@ma3azef.com](mailto:feedback@ma3azef.com) or via the online incident reporting page found <https://ma3azef.com/institutional-resources/>.
- This form must be submitted prior to commencing an investigation.
- The safeguarding committee will aim to formalize conclusions of the investigation within 10 working days of confirming the receipt of the formal complaint made. However, this period is renewable at the request of the committee.
- The complainant is required to identify the alleged accused individual and the injured party by name, when possible. This is necessary to enable Ma3azef to thoroughly assess and investigate the situation to the best of their abilities.
- When completing the report, concise responses consisting of one or two sentences for each item are sufficient for the purpose of this initial report.
- In cases where the answers are not yet known at the time of submission, it is acceptable to indicate "Not known yet".

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8. Location of incident (Where did it happen?)
9. Details of alleged incident (including names of victims or aggressors)
10. Have you taken any initial action?
11. Anything else to share?