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Global Code of Conduct (GCC)

For managers, employees, volunteers and partners

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Terre des hommes
Helping children worldwide.

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Foreword

Children are particularly vulnerable and therefore deserve special attention and protection.

We are Switzerland's leading children's aid agency and are recognised as serving the public interest. We are committed to bringing about lasting improvements to the living conditions of the most vulnerable children while ensuring that they, their families and their communities are protected.

We run projects on a non-profit basis and act free from any political, racial or religious bias. As a humanitarian organisation, we have a moral duty to run our activities with the utmost respect for the people with whom we work.

For this reason, we require all staff, partners and volunteers to adhere to the highest standards of behaviour at all times and in all places, based on humanitarian principles and our organisation's values^[1]. We constantly strive to improve our practices to ensure that they meet the most stringent international standards on child protection (also referred to as Child Safeguarding in this document) and humanitarian aid.

In particular:

- Any violation of the rights of the child, including the child's physical and mental integrity and safety, is prohibited. The abuse, mistreatment or exploitation of children is prohibited;
- Abusive behaviour – in particular physical, psychological, sexual or economic – against children, members of the communities in which we work, members of staff or any other stakeholder with whom we have a relationship is prohibited;
- According to our mandate and values, all sexual relations and any other act of a sexual nature with a child under 18 years of age are prohibited, regardless of the age of sexual consent in the programme country. Lack of knowledge of the child's actual age cannot be invoked as a defence. This ban also applies to pornographic activities;
- Sexual relations and other sexual acts with our direct beneficiaries or with members of the communities in which we work who are over the age of 18 are strongly discouraged given the inherently unequal power dynamics. It is the obligation of every member of staff to inform his or her superior as soon as possible if such a situation occurs;
- Requesting sexual favours in return for money, employment, goods, services or any form of assistance is prohibited;
- Collaborating with individuals, groups or organisations who have any link with drug trafficking, arms trafficking, the trafficking and/or exploitation of human beings – including prostitution – as well as any other criminal activity is prohibited;
- Any direct or indirect discrimination based on colour, caste, national, ethnic or social origin, religion or belief, status, origin or nationality, political opinion, gender, sexual orientation, disability or age against our stakeholders is prohibited.

^[1] Tdh's values are courage, ambition, respect and commitment.

In addition, each employee, partner or volunteer is expected to:

- Comply with all our internal standards, namely Policies, Regulations, Directives and Procedures;
- Use our computer equipment responsibly and follow the rules on its use;
- Collect and confidentially process personal and/or sensitive data on beneficiaries and members of the communities in which we operate, donors, partners and any other stakeholders in compliance with the relevant legal standards, our internal rules and the principle of proportionality;
- Make the best possible use of natural resources, limit any negative environmental impact and minimise the use of environmentally harmful compounds and substances.

This Global Code of Conduct is supplemented by other more specific internal rules (Policies, Regulations, Directives, Procedures, etc.) listed in the appendix, which apply to staff, volunteers and partners, who are therefore required to comply with them. These rules may be amended and/or supplemented. Staff, volunteers and partners are therefore expected to acquaint themselves with and apply the new rules.

1. Aim of this Global Code of Conduct (GCC)

The Global Code of Conduct (GCC) summarises Tdh's institutional policies and rules that set out our Code of Conduct. It aims to provide staff with a professional framework that covers all forms of behaviour or action. Given the trust placed in us by the donors, backers and people we work with, this framework applies to relationships between employees and relationships with beneficiaries, as well as with the members of their communities.

We require our staff and partners to abide strictly by this GCC.

2. Terms of Reference

2.1 International law

We promote and respect children's rights as set out in the United Nations Convention on the Rights of the Child (CRC). Staff working on behalf of Tdh must first and foremost protect every child's right to live in safety, free of the risk of mistreatment or exploitation. They must also always act in the child's best interest.

We comply with all international treaties in force, particularly the principles of International Humanitarian Law (IHL).

2.2 National law

As a foundation governed by Swiss law with a presence in almost 40 countries and funding from many States, we comply with the legislation of the countries in which we operate, as well as the legislation of donor countries.

We are particularly diligent with respect to complying with national and international criminal law. We do not work with individuals, groups or organisations with links to the drug trade, arms trafficking, human trafficking and/or exploitation (particularly the worst forms of labour, including prostitution), fraud and/or tax evasion, or suspected of having links with any other forms of criminal activity.

We ensure compliance with data protection laws in force in Switzerland and in the countries in which we operate, and with confidentiality requirements on personal and/or sensitive data pertaining to beneficiaries, the members of communities in which we operate, partners, donors or any other stakeholders, insofar as a legal obligation on transparency or related to freedom of information is not already stipulated in a national or international law or in a contractual obligation.

2.3 Standards and certifications

We comply with internationally recognised standards, certifications, both technical and programme, in the international cooperation and humanitarian aid sectors. Examples include the Inter-Agency Standing Committee (IASC) guidelines on mental health and psychosocial support in emergency settings^[2], the “Do No Harm” framework^[3], the SPHERE handbook^[4], the *Core Humanitarian Standard on Quality and Accountability* (CHS)^[5], the *Minimum Standards for Child Protection in Humanitarian Action* (CPMS)^[6] and the standards of Switzerland’s ZEW0 label^[7].

3. Our core commitments

The commitments set out below refer to our behaviour towards all our internal and external stakeholders: beneficiaries and members of their communities, paid employees, volunteers and employees of third-party organisations or partners. These commitments apply to behaviour in both professional and private settings.

3.1 We abide by our values

Our actions are governed by four key values: *ambition*, *respect*, *courage* and *commitment*. We expect our staff to behave honestly, responsibly and transparently in all situations and in a manner that is in keeping with our values.

3.2 We act honestly and ethically

We do not tolerate any form of abusive behaviour, be it physical, psychological, sexual or economic; intentional or associated with negligence. Threats, harassment, abuse of authority, mismanagement, misappropriation of funds, collusion, the use of force or dominant positions or any other form of abuse will not be tolerated under any circumstances. Such behaviour will be addressed with due diligence, rigour and seriousness. In accordance with the legal framework and subject to duly documented exceptional circumstances^[8], we will report the case to the relevant authorities and/or impose appropriate disciplinary measures, according to the applicable staff rules in the project country or at headquarters.

^[2] <https://interagencystandingcommittee.org/mental-health-and-psychosocial-support-emergency-settings-0/content/iasc-guidelines-mental-health>

^[3] <https://www.eda.admin.ch/deza/en/home/themes-sdc/fragile-contexts-and-prevention/preventing-recurrent-cycles-violent-conflicts/conflict-sensitive-programme-management.html>

^[4] <http://www.sphereproject.org/handbook/language-versions>

^[5] <https://corehumanitarianstandard.org/files/files/Core%20Humanitarian%20Standard%20-%20English.pdf>

^[6] <http://cpwg.net/wp-content/uploads/sites/2/2014/03/CP-Minimum-Standards-English-2013.pdf>

^[7] <https://www.zewo.ch/en/the-21-zewo-standards>

^[8] If the local system allows it and where this does not put the victim or their entourage in danger. In situations where an adult person has been abused, the victim’s willingness to report the case is also a key factor in determining what action to take. In situations where a child has been abused, the child’s best interests are a key factor in decisions.

3.3 We work to safeguard children

We require employees to adhere to the highest standards of behaviour when dealing with children, to set a good example, not to display any violent behaviour and to be kind at all times. Under no circumstances may employees touch children inappropriately, use unsuitable language, make objectionable suggestions, provoke, harass, criticise or look down on a child, fail to show respect for a child's cultural practices, or exploit a child through labour or in any other manner.

In line with the CRC and our institutional policy, we have a zero-tolerance approach to child abuse. We support the principle of the accountability of all and the duty to report abuse.

3.4 We condemn all forms of sexual abuse and/or exploitation

We have zero tolerance for any form of sexual abuse and/or exploitation that targets beneficiaries, our partners' employees, members of the communities in which we operate, or any other vulnerable person, perpetrated by a member of our staff or authorised representatives acting on our behalf.

Requesting sexual favours in return for money, employment, goods, services or any form of assistance is strictly forbidden.

We consider that such abuse constitutes serious misconduct. In line with the legal framework, and pending any clearly substantiated exceptional circumstances^[9], cases of abuse will be reported to the relevant authorities and result in the termination of the contract on serious grounds.

We wish to create and maintain a work environment that is conducive to preventing sexual abuse and exploitation. We constantly seek to communicate and raise awareness of this issue to prevent a culture of complacency and impunity from developing.

3.5 We respect the principle of non-discrimination

We do not accept discriminatory behaviour, either direct or indirect, towards the stakeholders we work with, whether in the context of managing professional activities or in personal relationships. In practical terms, we refrain from making any offensive remarks or adopting offensive attitudes concerning a person's colour, caste, national, ethnic or social origin, religion or belief, status, origin or nationality, political opinion, gender, sexual orientation, disability or age. We are conscious of issues related to adaptations and improving accessibility for disabled persons.

^[9] See note 8

3.6 We respect the dignity of the people we work with

Any communication materials that use personal information and/or images of children and their families must comply with the relevant basic ethical principles and rules. This includes but is not limited to obtaining the consent of the child, their parents or a person responsible for the child before publishing photos or testimonies; always respecting the child's dignity; guaranteeing the child's safety and protecting their privacy if necessary and never publishing photos of children who are naked or dressed inappropriately.

The publication of images and information on our beneficiaries may only be for strictly professional purposes. These may only be distributed via our official communication channels. With respect to their use on social media, we recommend following existing best practice to avoid breaches of ethical principles and rules on communication.

3.7 We respect the institutional framework

We fulfil the tasks entrusted to us and act with good judgement and kindness in line with the values and rules that form part of our institutional framework. Our staff is obliged to comply with our internal rules and regulations, to keep informed of any changes and to apply the current relevant rules.

3.8 We act responsibly towards our staff

Our staff are of paramount importance and are our organisation's strength. We take our responsibilities towards them very seriously, both when recruiting, supporting, supervising and training them.

3.9 We use IT equipment responsibly

We respect the rules on the use of IT equipment. Access rights to our IT system are personal and non-transferable and are cancelled if the user no longer meets the multiple conditions for access. Our IT resources should only be used for professional purposes. Using these resources for private purposes is tolerated, if the use is reasonable and does not harm our reputation or image, or negatively affect the IT network's performance. Individuals are responsible for their own use of the IT resources at their disposal. The staff must not perform operations that could have an adverse effect on the network's operation, the integrity of the IT tools or our internal and external relationships. The staff must not make fraudulent use of tools or content for which licences that have been acquired (or any other form of copyright) do not comply with the applicable legi.

3.10 We conduct our activities diligently

We are as diligent as possible when conducting activities and fulfilling contractual obligations to donors, particularly when managing administrative, financial and logistical matters, by ensuring that the funds being managed are used for the agreed purposes and according to principles of quality, transparency, economy, competition, integrity, cost-effectiveness^[10], efficiency and excellence, in line with international standards.

We ensure that accounting records and documents supporting the project implementation are kept in compliance with the legal and contractual obligations in force and stored in a safe place.

When implementing projects and contracts, we place special emphasis on ethics and compliance with the principles of equal treatment, non-discrimination of partners and suppliers and impartial assistance to beneficiaries.

We develop and implement fair and transparent administrative, financial and logistical procedures to help prevent conflicts of interest.

We adhere to high standards on working conditions, equal treatment and the social and union rights of employees, partners and suppliers. As such, we avoid all relationships with partners or suppliers that are involved, even indirectly, in child labour, exploitation or any other human rights violations. We immediately terminate contractual relationships if one of these conditions is breached.

3.11 We respect the environment

We conduct all our activities with the greatest respect for the environment and in compliance with the organisation's social responsibility commitments. To comply with these commitments, we avoid misusing natural resources, limit environmental impact and minimise the use of substances and compounds that harm the environment. Furthermore, we take special care when selecting suppliers and partners and avoid entering into contracts with entities whose activities are inconsistent with the ethical use of resources, or which fail to respect the local population.

3.12 We work with reliable partners

We ensure that our partners are competent, rooted in their respective civil society, share similar goals and promote similar values to us. We work with entities that respect basic principles of good governance and our Child Safeguarding Policy.

We carefully consider partnerships with private businesses, applying strict acceptance criteria and our code of ethics on fundraising among businesses and foundations. If necessary, we conduct an ethical review on the company.

^[10] The best combination of the life cycle cost and quality.

4. Procedure to follow in the event of suspected or alleged breaches of this Global Code of Conduct

The successful implementation of this GCC relies on all our employees taking individual and collective responsibility.

Any suspected or confirmed breach of this GCC must be reported as quickly as possible to a supervisor or to the email address for reporting concerns: concern@tdh.ch

Whistleblowers will be protected. Under no circumstances will they be dismissed, demoted or discriminated against for reporting in good faith a breach of one of the principles in this GCC.

The confidentiality of all stakeholders will be respected for the duration of the procedure.

We will take all the measures we deem necessary, including:

- Ascertaining the facts as objectively as possible (respecting the presumption of innocence), while protecting the reputation and anonymity of the persons(s) involved.
- If a breach is confirmed, report the case to the relevant authorities, in compliance with the legal framework and subject to any clearly substantiated exceptional circumstances^[11].
- Taking the necessary disciplinary measures, which may include suspending or immediately terminating the employment contract on serious grounds;
- Reserving the right to inform other organisations requesting professional references that the contract was terminated following a serious breach of the GCC, subject to applicable laws protecting individuals and their data;
- Identifying appropriate measures to prevent repeat occurrences of such incidents by updating the relevant processes/procedures.

Any employee who falsely reports a breach to harm us or another employee may be reported to the relevant authority and face disciplinary measures.

^[11] See note 8

5. My personal commitments as an employee, representative or volunteer of the Terre des hommes Foundation

- ▶ I agree to comply with and promote human rights without discrimination and to treat the communities we work in with respect and dignity, in accordance with international standards and our ethical values and principles.
- ▶ I am aware that my behaviour when performing duties for Tdh must always be exemplary and comply fully with the rules in this GCC.
- ▶ I understand that any form of abuse, whether psychological, physical, sexual or economic, will result in disciplinary measures.
 - Sexual harassment, abuse and exploitation are strictly forbidden. I understand that exchanging money, goods, jobs, services or assistance in return for sexual favours may result in my conduct being reported and disciplinary measures being taken. Sexual relations with children are not accepted under any circumstances, regardless of the age of sexual maturity or consent in the country where we are operating.
 - Similarly, any breaches of the Child Safeguarding Policy will be severely punished. Violence towards children will not be tolerated under any circumstances, regardless of whether the violence is physical, sexual or psychological.
 - The improper use of Tdh's resources (for example, mismanagement or theft) and abuses of power will also result in disciplinary measures.
- ▶ I will prove myself worthy of the trust placed in me by acting with transparency and accountability. I will act in a professional manner by applying the principles of quality, efficiency and good management when conducting my activities. I will respect my mandate and the goods entrusted to me. I will not derive any personal advantage, whether direct or indirect, from my work. For this reason, I will declare any interest that could cause a problem.
- ▶ I agree to report any concern, suspicion or worry that this GCC may have been breached by a person working for Tdh or a partner organisation to my supervisor or by email to concern@tdh.ch. I understand that the highest standards of confidentiality will be observed and that I will not face reprisals for any report made in good faith.

6. Statement of commitment

I, the undersigned,

.....
declare that I have received, read and understood the Terre des hommes Foundation's Global Code of Conduct, in particular the rules concerning the Child Safeguarding Policy.

I declare that I am familiar with and agree to work in accordance with all the Foundation's policies and rules.

I understand that any failure to comply with the Global Code of Conduct may result in my actions being reported to the relevant authorities and to disciplinary measures, including the immediate termination (on serious grounds) of my employment contract.

Place/Date:

Signature:

Glossary

Abuse

Misuse, excessive or unfair use of something. This Global Code of Conduct covers physical, emotional, sexual and economic abuse in particular.

Abuse of authority

Abuse of power to obtain or procure an unlawful advantage for a third party.

Abuse of power

The abuse of a position of influence, power or authority at the expense of others. In its serious form it consists in the perpetrator using their position to unduly influence the career or conditions of employment (appointment, assignment, contract renewal, evaluation of professional behaviour, promotion, etc.) of others. It can also consist in creating a climate of hostility or harassment, intimidation, threats, blackmail or coercion in the workplace. The abuse of power is an aggravating factor in discrimination and harassment, including sexual harassment.^[12]

Age of sexual maturity

Sexual maturity is defined in this Global Code of Conduct as the age at which a minor may consent to a sexual act.

Child

Anyone below the age of eighteen, even if they have reached the age of majority under the law applicable to them.

Child sexual abuse/exploitation

Sexual abuse includes sexual assault, but also inappropriate acts or situations which are not understood by the child or for which they cannot give informed consent, or for which the child's development has not yet prepared them. Sexual exploitation means profiting or attempting to profit from someone in a position of vulnerability, unequal power or trust for sexual purposes, including but not limited to financial, social or political gain.

Collusion

An unlawful, often secret, arrangement between two or more persons, aimed at harming a third party by violating his or her rights or by preventing the truth from being revealed.

Conflicts of interest

Refers to the management of conflicting interests. In this case, it may be a question of a Tdh employee's private interests (financial, etc.) that would conflict with Tdh's mission.

Consent

The act of giving one's free and informed consent. A child can never give consent for sexual acts.

Discrimination

Discrimination includes language or actions intended to discriminate, treat someone differently or disparage them because of their origin; sex; age; language; social status; way of life; religious, philosophical or political beliefs or because of a physical, mental or psychological disability.

Dominant position

Position of power or superiority, especially economic.

^[12] UN Circular ST/SGB/2008/5

Gender

Social construct that classifies men and women and creates cultural conventions, social roles, behaviour, social representations, and the sexual division of labour and power.

Harassment

Under Swiss criminal law, harassment is a way for the perpetrator to make the victim give in and achieve what they want. In such cases, the offence of coercion (Art. 181 of the Criminal Code) could be used insofar as harassment makes it possible to hinder the victim's freedom to act and obliges them to act, not act or permit an act to be committed.

Harassment (sexual)

Any unwelcome conduct of a sexual nature or any other gender-based conduct that is an affront to the person's dignity in their workplace, namely threats, promised benefits, coercion or pressure of any kind in order to obtain sexual favours.

Harassment (in the workplace)

Is defined as a series of hostile comments and/or actions, repeated frequently over an extended period, in which one or more individuals seek to isolate, marginalise or even exclude a person in their workplace. Often each act, viewed individually, may appear bearable, but the actions taken as a whole are destabilising and force the employee who has been targeted to leave.

Inappropriate

That which is not within the bounds of propriety and best practice. That which is indecent.

Mismanagement

Management that breaches the rules aimed at safeguarding Tdh's assets or financial interests.

Other forms of abuse

"Other forms of abuse" include coercion, harassment, limitations on the freedom to act, threats of serious harm or psychological pressure.

Sexual relations

Any act of a sexual nature.

Threats

Words, statements, actions or behaviour intended to frighten or alarm a person.

Vulnerable situation

Situation in which a person may be an easy target owing to their age, maturity, their social and economic environment and their physical or mental state.

Zero tolerance

Policy that prohibits all staff (including volunteers), as well as Tdh partners, from committing acts of sexual abuse or exploitation and stipulates that any transgression will be punished.

Annexe

List of main documents that make up Terre des hommes' internal regulations

1. Statutes

The Foundation's statutes ensure compliance with the legal and regulatory obligations governing the incorporation of the legal entity under the Swiss Civil Code. They define the Foundation's mission as serving the public interest.

2. Vision and strategy

2030 Vision

This document describes Terre des hommes' vision for long-term impact as well as the means to achieve this goal.

2016–2020 Strategy

The Strategic Plan (SP) sets out Terre des hommes' priorities. It lays down the primary goals the Foundation will pursue in its programmes and various departments.

3. Global Code of Conduct

The Global Code of Conduct is a very important document that includes a series of critical existing internal elements (policies, regulations, values, etc.) and is therefore the reference document that summarises the key points in all Tdh internal documentation. It aims to reflect Tdh's corporate culture but also its own ethics, values and those it wishes to aspire to. The Global Code of Conduct covers all of Tdh's key elements and must systematically be signed by everyone who works for the organisation, irrespective of their status.

Governance bodies, in particular the Management, are responsible for regularly updating the Global Code of Conduct, and human resources are responsible for ensuring that all staff have signed it.

4. Policies

Policy against fraud, corruption and conflicts of interest

This policy sets out behaviour that is prohibited and harmful to Tdh's reputation, as well as each individual's responsibility for preventing such acts.

The General Management is responsible for updating this policy and the internal audit must ensure it is followed up and implemented.

Policy against the Funding of Criminal Activities

This policy identifies criminal behaviour that undermines Tdh's reputation but also its values and each individual's responsibility to prevent these acts.

The General Management is responsible for updating this policy and the internal audit must ensure it is followed up and implemented.

Policy to Safeguard Children and Beneficiaries

This policy is an important document for Tdh, an organisation which is active in child relief, as it reaffirms the organisation's commitment to promoting and guaranteeing the safety of children by protecting them from all forms of violence and abuse. Tdh considers child protection, promoting their well-being and defending their rights as the foundations of its work. This policy also meets the requirements for preventing sexual exploitation and abuse against beneficiaries and their communities. Procedures and guidelines specify the practical details of its implementation.

The risk management sector is responsible for regularly reviewing the policy and ensuring it is implemented and monitored.

Policy on protection from sexual exploitation and sexual abuse

This policy reaffirms the organisation's commitment to preventing all forms of sexual exploitation and abuse and sets out Tdh's strategy for preventing and managing the risks of sexual exploitation and abuse (SEA), while setting out Tdh's commitment to a zero-tolerance approach to abuse.

This policy applies exclusively to the protection and case management of individuals over the age of 18.

Risk management is responsible for reviewing this policy regularly and, together with the Human Resources Department and MC, ensuring that it is implemented and monitored.

Safety/Security policy

The Safety/Security policy forms the cornerstone of a system that provides security for teams in the field and in the countries and regions in which we work where there may be a range of specific threats. Considering rapid changes in the environments in which Tdh operates, the guiding principles in this policy must regularly be reviewed to ensure high standards of protection for Tdh staff in line with the best practice set out as part of the "duty of care".

Among other things, the policy sets out the guiding principles for managing security (including evacuation plans, severe crisis management, risk analysis, security plans, etc.) and procedures and guidelines specify the practical details for implementing it.

The risk management sector is responsible for regularly reviewing the policy and ensuring it is implemented and monitored.

Human Resource Policies

These policies define the rules and guiding principles for managing the employee's entire professional life cycle, from their recruitment through to their departure and including promotions, transfers, skills management and continuing education. Procedures and guidelines specify the practical details for implementing them.

The Human Resources Department is responsible for regularly reviewing these policies and ensuring they are implemented and monitored.

Communication and Social Media policy

The policy set out a series of guiding principles for communication and images at Tdh, namely with respect to graphic design and social media. Procedures and guidelines specify the practical details for implementing it.

The Fundraising & Communications department is responsible for regularly reviewing the policy and ensuring it is implemented and monitored.

Data protection policy

Interim guidelines have been drafted pending the drafting of this policy.

These guidelines lay down the framework for managing and protecting data processed by Tdh, both at headquarters and in the field, according to the relevant Swiss and European legal requirements. This is a priority for Tdh because of the risks of poor data management to the beneficiaries and the organisation. Procedures specify the practical details for implementing them.

The Quality and Accountability Unit is responsible for regularly reviewing the directive and ensuring it is implemented and monitored.

5. Rules

Management and Organisation Rules

These two rules stipulate the obligations, responsibilities and functioning for Tdh's management and for the Foundation's Board according to the Foundation's statutes.

Staff Rules

The Staff Rules reflect the legal requirements of Swiss labour law with respect to employees, which are an important element of the "duty of care" in seeking to protect the individual and their reputation. The Rules also aims to list the guiding principles governing working relations between Tdh and all staff at headquarters and abroad. They set out the rights and obligations of the staff and a series of disciplinary measures should there be a breach of any of the obligations.

Procedures and guidelines specify the practical details for implementing them. This document forms the basis for setting out the rules for staff in the field.

The Human Resources Department is responsible for regularly reviewing the regulations based on changes in the labour law and ensuring that they are implemented and monitored, particularly with respect to disciplinary measures.

Rules on computer resources

This document sets out the rules for using the computer resources provided by the Terre des hommes Foundation (tdh.ch) and stipulates each user's rights and duties. Procedures and guidelines specify the practical details for implementing them.

The Finance Department is responsible for regularly reviewing the regulations and ensuring they are implemented and monitored.

**Every child in the world
has the right to a childhood.
It's that simple.**



Global Code of Conduct (GCC)



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Responsibility for updates: MC

Responsibility for implementation: MC, Risk Sector and HR, all the staff

Other attached documents:

Child Safeguarding Policy,

Policy on the Protection from Sexual Exploitation and Abuse



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