

Introduction

HiiL is committed to providing and promoting a safe, respectful, and inclusive environment for everyone who works with or is affected by our programmes. We uphold a **zero-tolerance approach** to all forms of Sexual Exploitation, Abuse and Harassment (SEAH). SEAH is incompatible with HiiL's mission, values, and commitment to justice, dignity, and human rights.

This policy replaces and expands HiiL's former Sexual Harassment Policy and reflects international best practice, moving beyond an internally focused approach to fully embrace HiiL's **penholder responsibility** across programmes, partnerships, and target groups. It aligns with the **IASC Six Core Principles on PSEA (2019)** and the **Core Humanitarian Standard (CHS)**.

What do we mean by Sexual Exploitation, Abuse and Harassment?

SEAH stands for **Sexual Exploitation, Abuse, and Harassment**. It refers to any unwanted sexual behaviour that makes someone feel uncomfortable, offended, humiliated, or intimidated. This can include physical, verbal, or non-verbal actions, whether they happen once or repeatedly.

SEAH also includes situations where sexual activity is requested or expected in exchange for work, benefits, or opportunities, or where behaviour creates a hostile or unsafe environment. Such conduct is unacceptable and has no place in our organisation.

Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

- Sexual comments, stories and jokes
- Physical violence and sexual assault
- Unwelcome sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- The use of job-related threats and rewards in exchange for sexual favors
- Sending sexually explicit messages (by phone or by email)
- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling

Any physical contact, including patting, pinching, stroking, kissing, hugging, fondling, or touching must be consensual and welcome.

HiiL recognises that sexual harassment can occur between people of the same sex. What matters is not the intent of the behaviour, but that it is unwanted and unwelcome by the person experiencing it.

HiiL also acknowledges that sexual harassment is often linked to power imbalances. This should never prevent anyone from speaking up, setting boundaries, or accessing the protection and support provided under this policy.

Goal

The objectives of this SEAH Policy are to:

- Prevent sexual exploitation, abuse, and harassment in all HiiL-related activities
- Establish clear behavioural standards and responsibilities
- Provide safe, accessible, and trusted reporting mechanisms
- Ensure timely, fair, and survivor-centred responses to incidents
- Strengthen accountability within HiiL and across partnerships
- Embed SEAH risk management throughout programme design and delivery

Applicable to

This policy applies to:

- All HiiL staff, board members, interns, and volunteers
- Service providers, Sub Grantees, suppliers and other subcontractors
- Implementing and strategic partners
- Anyone engaged in or affected by HiiL programmes, including justice users and community participants

This policy applies in all work-related contexts, including offices, programme locations, events, travel, online environments, and informal or social activities linked to HiiL.

Basic principles

This policy is guided by the following international standards and principles:

- IASC Six Core Principles relating to Sexual Exploitation and Abuse (2019)
- Core Humanitarian Standard (CHS)
- UN Secretary-General's Bulletin on Protection from Sexual Exploitation and Abuse
- Dutch labour law and applicable national legislation

Core principles underpinning this policy:

- **Zero tolerance:** SEAH is strictly prohibited in all circumstances
- **Survivor-centred approach:** The rights, dignity, safety, and wishes of survivors are prioritised at all times
- **Do no harm:** All actions seek to minimise further harm or re-traumatisation
- **Accountability:** All allegations are taken seriously and addressed promptly
- **Confidentiality:** Information is shared strictly on a need-to-know basis
- **Non-retaliation:** Retaliation against reporters or survivors is prohibited

SEAH in HiiL Programmes and Partnerships (Penholder Responsibility)

As HiiL strengthens its SEAH framework, the organisation commits to:

- Integrating SEAH risk assessments into programme design and planning
- Requiring partners to have SEAH policies or supporting minimum standards
- Ensuring accessible reporting channels for justice users and communities by publishing speak-up mechanisms on the HiiL website and via posters in country affiliates
- Clarifying accountability for incident handling across partnerships
- Strengthening SEAH capacity-building for staff and partners

This ensures that HiiL's zero-tolerance, survivor-centred approach extends beyond the organisation to everyone engaged in its programmes.

Roles and responsibilities

Executive Board

- Sets tone, actively promotes culture of respect, safety and transparency and ensures organisational accountability for SEAH prevention and response
- Approves and oversees the SEAH framework

Management and Line Managers

- Foster a culture of respect and zero tolerance
- Ensure awareness, training, and compliance
- Act immediately when concerns arise

HR Manager

- Maintain SEAH policy, procedures, and training
- Promote a safe work environment
- Ensure confidential handling of reports
- Coordinate response and referrals

Confidential Counselors (Safeguarding)

- Follow SEAH policy, procedures, and training
- Provide first care, help and advice to council seekers
- Promote a safe work environment
- Ensure confidential handling of reports

All Staff and Affiliated Personnel

- Uphold this policy and Code of Conduct
- Report suspected or actual SEAH
- Cooperate with investigations

HiiL Partners

- Maintain robust SEAH policy or minimum standards
- Provide safe reporting channels for staff and communities
- Cooperate with HiiL on prevention and response

Prevention and Risk Management

- Due Diligence and Vetting:
 1. HiiL has a robust staff screening process in place including mandatory reference checks and for managers and certain key positions the issuance of a Certificate of Good Conduct (VOG in NL) to prevent hiring known / formerly convicted abusers.
 2. HiiL ensures partner accountability by binding all implementing partners to the HiiL SEAH policy and ensures that the due diligence extends to the entire supply chain.
- Contextualized Risk Assessment: HiiL plans to annually assess SEAH risks based on the work locations, type of projects and vulnerability, besides implementing the general HiiL-wide policy.
- Mandatory Training:
 1. HiiL provides all staff, service providers, sub grantees and interns with training during the Onboarding process at HiiL on our Code of Conduct, DEI principles and SEAH standpoints.
 2. Confidential Counselors and HR representatives are trained how to best support and assist those who report inappropriate behavior and violations of SEAH or integrity.

3. Annual online refresher SEAH training is in the making to ensure that all staff, subcontractors and partners understand what constitutes SEAH and how to report it.

(Mandatory) Reporting

With this policy HiiL operates a **mandatory reporting obligation** for all staff and affiliated personnel who witness, suspect, or receive information about SEAH.

All SEAH concerns must be reported **through HiiL's Speak-Up Policy and reporting channels**. These channels allow for confidential and, where possible, anonymous reporting.

Failure to report SEAH may itself constitute a breach of this policy.

Response, Support and Resolution

All SEAH reports are handled in line with the **HiiL Response Plan**, which provides a structured, survivor-centred process, including:

- Immediate safety and protection measures
- Access to psycho-social and medical support
- Informed consent of survivors at every stage
- Clear decision-making and accountability lines
- Fair and timely investigations

HiiL recognises that survivors may choose not to pursue formal investigations. Support will be provided regardless of the chosen path.

Sanctions and Corrective Measures

Substantiated breaches of this policy may result in disciplinary or contractual measures, up to and including:

- Termination of employment or contract
- Removal from programmes or partnerships
- Referral to legal or regulatory authorities

Sanctions are proportionate to the severity of the conduct and consistent with due process.

Monitoring, Learning and Review

- **Monitoring and learning:** We will carefully track reported cases, while fully protecting confidentiality, to understand patterns and improve how this policy works in practice.
- **Regular review:** The policy will be reviewed and updated every 2 years to reflect international standards (such as IASC and CHS) and lessons learned from experience.
- **Continuous improvement and learning** are integral to HiiL's commitment to safeguarding.