



2024

PREVENTING SEXUAL EXPLOITATION, ABUSE, AND HARASSMENT (PSEAH) MANUAL

ZEBRA GENERATION

Preamble

At Zebra Generation, we are committed to creating a safe and respectful environment for everyone, particularly vulnerable populations. We recognize that our work can have a profound impact on the communities we serve, and it is our responsibility to ensure that our actions promote dignity, respect, and protection. We believe that every individual has the right to be treated with dignity and respect, and we will not tolerate any form of exploitation, abuse, or harassment.

We are dedicated to preventing and responding to incidents of sexual exploitation, abuse, and harassment (PSEAH) in all our programs, projects, and operations. We will take proactive steps to prevent PSEAH, including training, awareness-raising, and risk mitigation. We will also respond promptly and effectively to incidents of PSEAH, ensuring that survivors receive the support they need.

Our PSEAH policy outlines our commitment to protecting individuals from sexual exploitation, abuse, and harassment. It provides a framework for prevention, reporting, response, and support, and applies to all staff, partners, and associates. By adopting this policy, we demonstrate our commitment to creating a safe and respectful environment, and we will work tirelessly to prevent and respond to PSEAH incidents.

Table of content

PREAMBLE.....	I
TABLE OF CONTENT	II
1.0 INTRODUCTION.....	1
1.2 DEFINITIONS	1
2.0 OUR COMMITMENT	2
<i>2.1 Principles for investigation and action</i>	<i>2</i>
<i>2.2 Steps towards commitment.....</i>	<i>2</i>
3.0 INTERNAL COMPLAINT MECHANISMS	3
<i>3.1 Internal Informal Complaint Mechanism.....</i>	<i>3</i>
<i>3.2 Internal Formal Complaint Mechanism</i>	<i>4</i>
4.0 REPORTING PROCEDURES FOR DOWNSTREAM PARTNERS AND OTHER EXTERNAL ACTORS.....	4
5.0 CONFIDENTIALITY	4
6.0 DONOR AND REGULATORY REPORTING	5
7.0 ASSOCIATED DOCUMENTS	5
8.0 POLICY ON PREVENTING SEXUAL EXPLOITATION, ABUSE, AND HARASSMENT (PSEAH).....	6
<i>8.1 Code of Conduct</i>	<i>6</i>

1.0 Introduction

ZEBRA Generation (ZEBRAG) has a zero-tolerance approach to sexual exploitation, sexual abuse, and sexual harassment (SEAH) and to policy non-compliance. ZEBRAG joins the international nonprofit community in strongly supporting the core principles regarding the prevention of sexual exploitation and abuse, established in 2003 by the UN Secretary General's Bulletin on Special Measures. We believe that all people have the right to live their lives free from sexual violence and we shall strive to protect everyone from abuse and exploitation in the operations of ZEBRAG as well as those of our downstream partners, which include grantees and subcontractors. Our commitment to better understanding, integrating, and addressing intersecting issues of gender, disability, and sexuality is further clarified in our Gender Guidelines.

The Policy on Preventing Sexual Exploitation, Abuse, and Harassment (PSEAH) (the "PSEAH Policy" or "Policy") was approved by the Board of Directors on November 18th, 2023. ZEBRAG Board shall review, amend (as needed) and re-approve this policy every five years or when deemed necessary.

The PSEAH Policy applies to all our personnel and to members of any ZEBRAG governance bodies (ZEBRAG directors, officers, and committee and task force members). See the section below for the application of this Policy to ZEBRAG downstream partners. Allegations of prohibited conduct can be made by any person irrespective of whether such persons have any contractual status with ZEBRAG. This Policy is intended to supplement, and not supersede or otherwise function in lieu of, ZEBRAG's Employee Handbook or Program Team FAQs as applicable.

1.2 Definitions

1. **Sexual exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from sexual exploitation of another.
2. **Sexual abuse:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual offences including but not limited to: attempted rape (which includes attempts to force someone to perform oral sex); and sexual assault (which includes non-consensual kissing and touching). All sexual activity with someone under the age of consent in the jurisdiction where the activity occurs is considered to be sexual abuse.
3. **Sexual harassment:** A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favors, or engages in other unwelcome conduct of a sexual nature, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated, or intimidated. Sexual harassment can take various forms. It can be obvious or indirect, physical or verbal, repeated or one-off, and perpetrated by any person of any gender towards any person of any gender. Sexual harassment can be perpetrated against beneficiaries, community members, citizens, as well as staff and personnel. This may include conduct that interferes with work, is made a condition of employment, or creates an intimidating, hostile, or offensive environment.
4. **Sexual misconduct:** For the purpose of this Policy, this refers to acts of sexual exploitation, abuse, or harassment as defined above. Sexual misconduct can include bullying. Sexual misconduct may be carried out in person or remotely, including, but not limited to, via phone, email, or social media.

2.0 Our Commitment

All allegations of sexual misconduct will be investigated and acted upon fairly and in accordance with ZEBRAG's policies and processes.

2.1 Principles for investigation and action

We will abide by the following principles in reviewing SEAH allegations:

- Recognize the importance of a survivor-centered approach.
- Listen to and value the voices of persons with disabilities.
- Base ZEBRAG's commitment to respect the human rights protected by this Policy on internationally recognized human rights standards as contained in internationally and regionally recognized human rights instruments.
- Treat the victim/survivor with respect, provide them with comprehensive information, and involve them in decision-making.
- Apply SEAH protection in ways that are culturally sensitive but without condoning acts that are harmful.
- Recognize that inequalities based on intersectional identities including such distinctions as worker/beneficiary; ability/disability; ethnic and Indigenous status; religion; age; health; and poverty can increase the risk of SEAH.
- Further recognize that, as noted in ZEBRAG's Gender Guidelines, the intersection of gender and sexual orientation with other forms of inequality can increase the likelihood of SEAH occurring.

2.2 Steps towards commitment

To fulfill our commitment, ZEBRAG has taken or will take the following internal steps:

- Assign oversight of PSEAH efforts, policies, and protocols to the Deputy Director in order to monitor effectiveness, report progress, and improve efforts to prevent and respond to sexual misconduct that arises in the course of our work.
- The Deputy Director will report concerns, issues, or progress that arise through regular oversight to the Executive Director, who will report these to the Board and to ZEBRAG donors per their reporting guidelines, with the Deputy Director doing so in the Executive Director's absence. As appropriate, the Deputy Director will raise concerns, issues, or progress with the Management Team.
- Investigate all allegations of sexual misconduct against ZEBRAG personnel fairly and in accordance with ZEBRAG's policies and processes. Investigation will be conducted by one or more of the following: ZEBRAG Executive Director, Deputy Director, Board Executive Committee, ensuring due process to the best of ZEBRAG's ability. Please refer to the Employee and/or Consultant Handbooks as applicable.
- Act on the findings of investigations as appropriate and ensure lessons learned are used to improve policy and practice.
- Not knowingly engage anyone who poses an unacceptable risk to those around them.
- Utilize effective recruitment and screening processes for all personnel, including criminal background checks that follow local legal requirements, targeted interview questions, and verbal reference checks.
- Require all personnel to read the PSEAH Policy when they are hired, along with linked policies listed below, and adhere to them.
- Require all personnel to sign the PSEAH Code of Conduct (below) upon hire as well as annually.
- Provide consistent and regular training on topics related to PSEAH for all ZEBRAG personnel.
- Provide supports as appropriate and feasible to ZEBRAG personnel who are victims or affected by situations of sexual exploitation, abuse, and harassment.
- ZEBRAG board shall review, amend (as needed), and re-approve this Policy every three years.

To fulfill this commitment, ZEBRAG has also taken or will also take the following steps vis-à-vis downstream partners:

- Include PSEAH Policy requirements in contracts and grant agreements.
- Provide information and resources on PSEAH for all ZEBRAG downstream partners.
- Require all downstream partners to have or develop sufficient PSEAH policies and protocols. Our Director of Grants Management will monitor that this is the case.
- Include PSEAH in ZEBRAG's risk assessment and monitoring efforts, and in all aspects of our relationship with downstream partners, including grant and contract agreements, grant application or procurement review, grant monitoring and oversight, and reporting requirements.
- Conduct regular audits of whether downstream partners have PSEAH Policies, protocols, and/or staff training in place. Monitor and follow up on any gaps.
- Make clear we firmly expect reporting of any allegations or incidents within two days and reporting of any Policy violations within five days (see "Reporting Procedures for Downstream Partners and Other External Actors" below).
- Investigate all allegations of sexual misconduct involving ZEBRAG downstream partners in a timely and professional manner and ensure due process to the best of ZEBRAG's ability. As appropriate to the jurisdiction where the matter arises, and when it comports with the wishes of the victims, survivors, and whistleblowers, a referral to the local law enforcement authorities may be made.
- Act on the findings of investigations and ensure lessons learned are used to improve policy and practice.
- Where allegations arise, prior to the release of any new funding or completion of any new contract, confirm that the downstream partner has acted or is acting in accordance with either the ZEBRAG PSEAH Policy or their own policy to report and discipline the alleged perpetrator, or is putting in place a sufficient policy and will abide by it.
- Make clear to downstream partners that any grant or contract made by ZEBRAG shall be subject to suspension or revocation if ZEBRAG determines that the partner is not fully in compliance with the ZEBRAG PSEAH Policy or the above steps. For situations involving children, refer to the ZEBRAG Child Protection Policy.

3.0 Internal Complaint Mechanisms

ZEBRAG personnel who believe they are victims of prohibited conduct may seek resolution through an informal or formal process, as explained below. The processes described in this Policy are neither mandatory nor listed in priority order. An unsuccessful attempt to resolve the matter informally does not preclude it from being formally reported.

The mere expression of disagreement, admonishment, criticism or similar expressions regarding work performance, conduct, or related issues within a supervisory relationship shall not normally be considered sexual misconduct within the meaning of this Policy. For conduct not covered under this policy refer to the ZEBRAG Grievance Policy.

3.1 Internal Informal Complaint Mechanism

Approaching the alleged offender: Affected individuals may, on a voluntary basis, if they feel comfortable doing so, approach the alleged offender directly and request that the alleged behavior cease.

Managerial intervention: Affected individuals may raise the issue with their supervisor if the situation allows and they feel comfortable doing so. Managers should provide advice, Human Resources assistance and/or information in a timely, sensitive and impartial manner regarding the availability of

confidential advice, assistance, or other options available under this Policy, and report the internal complaint to the Deputy Director and/or the Executive Director so senior management is aware. Managers should enact any appropriate protective measures available. If a manager cannot perform this role for any reason, the manager shall consult with the Deputy Director and/or Executive Director for alternative measures.

3.2 Internal Formal Complaint Mechanism

ZEBRAG personnel may file a formal complaint of prohibited conduct. Reports should be submitted to the ZEBRAG Deputy Director, Executive Director, and/or Board Executive Committee. There is no deadline for filing a formal complaint, though we urge all reports to be made within 24 hours of becoming aware of them. Reports by an identified complainant as early as possible after the alleged incident(s) of prohibited conduct are strongly encouraged, as anonymity and the passage of time may result in challenges to effective investigation and resolution.

In cases of suspected or detected sexual misconduct by individuals, the ZEBRAG Deputy Director, Executive Director, and/or Board Executive Committee will investigate the concern and determine the best course of action. Until the investigation is complete, ZEBRAG will follow disciplinary procedures outlined in the Employee Handbook and/or Consultant FAQs. If allegations constitute a criminal offense in the jurisdiction where the matter arises, a referral to the police may be made.

4.0 Reporting Procedures for Downstream Partners and Other External Actors

Each downstream partner shall be bound by the ZEBRAG PSEAH Policy and will be required to demonstrate it has adopted or is in the process of adopting and implementing a sufficient PSEAH policy that is consistent with the ZEBRAG PSEAH Policy. Each downstream partner will be required to report any allegations or incidents to ZEBRAG within two days.

Reports of complaints from downstream partners or other external actors must focus on: the nature of the concern and details of the incident as witnessed or as disclosed to them. Reports of abuse or exploitation of individuals must follow ZEBRAG's Child Protection Policy. The reporter should make notes at the time of the disclosure or incident, noting what the individual says happened using his or her own words and phrases, or noting what was witnessed. Reports should be made to zebragen256@gmail.com which is monitored by the Executive Director and Board Executive Committee. Reports can also be made to zebragen256@gmail.com, which is only monitored by the Executive Committee.

The report can include details such as the following:

- Name of alleged victim.
- Address and/or present location of alleged victim.
- Name of suspected abuser.
- Incident information, including date/time of incident; place of incident.
- Type of abuse alleged.
- Reporter's observations; statements by alleged victim.
- Other persons knowledgeable of the alleged abuse.
- If relevant, family member or other person responsible for alleged victim's well-being.
- Name of reporting party.
- Signature of person writing the report and date of report.
- DO NOT TAKE NOTES IN FRONT OF CHILD DISCLOSING AN INCIDENT.

In cases of suspected or detected sexual misconduct by individuals, the ZEBRAG Deputy Director, Executive Director, and/or Executive Committee will investigate the concern and determine the best course of action.

5.0 Confidentiality

In all matters dealt with as part of this Policy, it is essential to respect the need for confidentiality to

ensure the safety and wellbeing of victims/survivors of sexual misconduct and others who report sexual misconduct. This may include not being able to respond to the complainant beyond acknowledgement of receipt. In certain circumstances, the failure to maintain confidentiality may have devastating effects on the lives of victims or survivors of sexual misconduct and may also result in serious consequences for those who report sexual misconduct.

6.0 Donor and regulatory reporting

ZEBRAG is required to share details of allegations of abuse with certain external organizations such as organizational donors and regulatory bodies. Please refer to the Safeguarding Protocol for how to file reports. Individuals who are responsible for enforcing this Policy or addressing concerns made hereunder shall endeavor to maintain confidentiality to the extent possible consistent with discharging their obligations under this Policy.

7.0 Associated Documents

- a) Child Protection Policy
- b) Code of Ethics
- c) Employee Handbook
- d) Gender Guidelines
- e) Grievance Policy
- f) Policy for Reporting Suspected Abuse of Individuals (Report Abuse Policy)
- g) Program Consultant Handbook FAQs
- h) Safeguarding Protocol
- i) Volunteer/Intern FAQs
- j) Whistleblower Protection Policy

8.0 Policy on Preventing Sexual Exploitation, Abuse, and Harassment (PSEAH)

8.1 Code of Conduct

All personnel will be required to sign the "Preventing Sexual Exploitation, Abuse, and Harassment (PSEAH) Code of Conduct" (below) when first engaged by ZEBRAG and on an annual basis thereafter.

I, _____ [insert name],
acknowledge that I have read and understand the ZEBRA Generation's Policy on Preventing Sexual Exploitation, Abuse, and Harassment (PSEAH), and agree that in the course of my association with ZEBRAG, I must:

- Treat all people in the workplace with courtesy and respect and demonstrate my commitment to the prevention of and response to prohibited conduct.
- Treat all individuals with respect regardless of race; color; sex; sexual orientation; gender identity; language; age; religion; political or other opinion; national, ethnic or social origin, disability; or other status.
- Not use language or behavior towards any individual that is harassing, abusive, sexually provocative, or demeaning.
- Refrain from any form of sexual misconduct, including bullying.
- Undertake mandatory training and attend other training opportunities to the extent possible.
- Familiarize myself with this policy and related policies and resources, including the Child Protection Policy, Report Abuse Policy, and Whistleblower Policy.

I understand that the onus is on me, as a person engaged by the ZEBRA Generation, to use common sense and avoid actions or behaviors that could be construed as sexual misconduct when implementing our activities. I understand that any breach of this Code of Conduct will not be tolerated by the organization and will be cause for disciplinary action including dismissal from my position.

Print Name: _____

Signature: _____

Date: _____

POLICY SIGN OFF

The ZEBRAG Preventing Sexual Exploitation, Abuse, and Harassment (PSEAH) Policy was signed on 24th March 2024 at Moyo Multipurpose Training Center by

Executive Secretary

Signature
Maliamungu James

Executive Directors

Signature
Unzimai Julius

Chair Board of Directors

Signature
Viola Brenda