CORPORATE POLICY

Prevention of Sexual Exploitation, Abuse and Harassment (SEAH) Policy

POLICY NUMBER	OPES-POL-09
VERSION	IFC
POLICY OWNER	Managing Director
APPROVED BY	Board of Directors, 6 March 2025
EFFECTIVE DATE	6 March 2024
NEXT REVIEW	12 months after approval
APPLIES TO	All OPES personnel, subcontractors, consultants and partners, at work and outside working hours

1. Policy statement

OPES has zero tolerance for sexual exploitation, abuse and harassment. We will take every reasonable step to prevent SEAH, to respond to it promptly and to support anyone affected. We put the safety, wishes and wellbeing of survivors at the centre of every response.

2. Definitions

- **Sexual exploitation:** any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting financially, socially or politically from the sexual exploitation of another
- **Sexual abuse:** actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions
- **Sexual harassment:** any unwelcome conduct of a sexual nature that might reasonably be expected or perceived to cause offence or humiliation, including unwelcome comments, advances, requests for sexual favours, images or messages

3. Standards of behaviour

OPES personnel and partners must never:

1. Engage in any form of sexual exploitation, abuse or harassment
2. Engage in sexual activity with anyone under 18, regardless of the local age of consent or a belief about the person's age
3. Exchange money, employment, goods, services or assistance for sex, including sexual favours

4. Use their position, for example in recruitment, contracting or community engagement, to seek sexual favours
5. Use OPES equipment or systems to view, create or share sexually exploitative material

OPES strongly discourages sexual relationships between personnel and members of communities affected by projects OPES works on, because of the inherent power imbalance.

All personnel must report any SEAH concern they become aware of, whether it involves OPES personnel or partners.

4. Prevention

OPES will:

- Include SEAH clauses in all employment contracts and in contracts with subcontractors and partners
- Carry out safer recruitment, including reference checks that ask about misconduct, and criminal record checks where permitted by law
- Provide SEAH training to all personnel on joining and annually
- Assess SEAH risks for projects OPES develops, including risks arising from an influx of workers, and agree mitigation with contractors
- Make sure community members know how to raise concerns safely

5. Reporting

Concerns can be raised through any channel in the Whistleblowing Policy (OPES-POL-04), including anonymously, or directly with the SEAH focal point: ethics@opesafrica.com. Survivors and witnesses do not need to prove anything to report.

6. Response: a survivor-centred approach

1. **Safety first.** Immediate steps are taken to protect the survivor and others at risk.
2. **Respect and consent.** The survivor's wishes guide what happens next, where the law allows.
3. **Confidentiality.** Information is shared only on a need-to-know basis.
4. **Support.** Survivors are referred to medical, psychosocial and legal support. In Ghana this includes services such as the Domestic Violence and Victim Support Unit (DOVVSU) of the Ghana Police Service, where the survivor wishes.
5. **Investigation.** Allegations are investigated promptly and impartially by trained investigators, with external support where needed.
6. **Action.** Confirmed misconduct leads to disciplinary action, including dismissal or contract termination, and referral to the police where appropriate and consistent with the survivor's wishes.

7. Reporting to funders

OPES will inform funders and clients of SEAH allegations connected to their projects as required by contract, including Norad and other development partners, without disclosing the survivor's identity unless the survivor consents.

8. Roles

Role	Responsibility
Managing Director	Accountable for this policy
SEAH focal point	Receives reports, coordinates support and response, maintains confidential records
Managers	Promote a safe culture and act on concerns
All personnel and partners	Follow this policy and report concerns

9. References

- Norad guidance on ethical guidelines and SEAH for grant recipients
- IASC Six Core Principles relating to Sexual Exploitation and Abuse
- ILO Violence and Harassment Convention, 2019 (No. 190)
- Whistleblowing Policy (OPES-POL-04)