

# OTR Company

## Prevention of Sexual Exploitation, Abuse, and Harassment) Policy



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Photo credit: Sasi Harib

## 1. Purpose

This policy defines OTR Training and Consultancy's commitment to preventing any form of Sexual Exploitation, Abuse, and Harassment (SEAH) and outlines the response mechanism both within and outside the company. OTR is dedicated to fostering a safe and respectful environment for all employees, partners, stakeholders, beneficiaries, and communities we work with.

Given that OTR is owned by a group of women and that 50% of leadership positions are held by women, the company takes gender equality and the protection of individuals most vulnerable to SEAH very seriously. This policy reflects our responsibility to uphold ethical standards and respect human dignity, especially for those at heightened risk of exploitation and abuse.

## 2. Scope

This policy applies to:

- OTR employees, contractors, consultants, and volunteers.
- Stakeholders and partners, including individuals and communities involved in OTR Company's programs and projects.
- Locations where OTR Company operates, whether in offices or field sites.

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## 3. Policy Statement

OTR has a zero-tolerance approach to all forms of sexual exploitation, abuse, and harassment. We are committed to ensuring that our work environment, as well as our external engagements, are free from SEAH. Any form of SEAH is unacceptable and will result in disciplinary actions, including termination and legal prosecution where applicable.

**OTR pledges to:**

- Promote an inclusive, respectful, and safe workplace.
- Educate employees and stakeholders on the importance of preventing SEAH.
- Ensure that any form of SEAH is reported, investigated, and addressed immediately and confidentially.
- Support victims/survivors of SEAH through appropriate response mechanisms, including protection from retaliation.

## 4. Responsibilities

- **Board of Directors:**

The Board of Directors of OTR is responsible for fostering a safe and inclusive culture, leading by example, and ensuring the implementation of all SEAH prevention measures. The Board will oversee compliance with this policy and support those affected by exploitation, abuse, or sexual harassment with the necessary resources and procedures.

- **Human Resources (HR):**

HR will ensure that all employees, contractors, and volunteers are educated on SEAH policies, including training on identifying and preventing SEAH. HR will be responsible for receiving, investigating, and addressing complaints, as well as offering protection from retaliation.

- **Managers and Supervisors:**

Managers and supervisors must actively enforce the PSEAH policy and monitor the work environment for any signs of SEAH. They are also responsible for creating an open and supportive atmosphere where individuals feel safe reporting incidents.

- **Employees and Stakeholders:**

Every employee and stakeholder is responsible for upholding OTR's PSEAH values by fostering a culture of respect and preventing SEAH. All employees are required to report any incidents of SEAH and cooperate with investigations.

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## 5. Prohibited Conduct

Any form of sexual exploitation, abuse, or harassment is strictly prohibited. This includes, but is not limited to:

1. **Sexual Harassment:** This can involve sexual remarks, requests for sexual favors, or any other verbal or physical behavior of a sexual nature. Specific examples include:
  - Making sexual comments or jokes.
  - Displaying sexually suggestive images or objects.
  - Physical contact of a sexual nature.
2. **Sexual Exploitation:** Exploiting a vulnerable person for sexual purposes. An example of this is:
  - Offering money or goods in exchange for sexual favors, often involving a power imbalance between the perpetrator and the victim.
3. **Sexual Assault:** Any sexual act committed against a person, including rape, assault, and forced sexual acts.

It is important to recognize that sexual harassment, exploitation, and abuse can occur between individuals of any gender or sexual orientation. The impact of such behaviors can be devastating, with long-term consequences for victims, and is in violation of cultural norms, religious values, traditions, and ethics.

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## 6. Reporting and Complaint Mechanisms

OTR is committed to providing safe and confidential channels for reporting any incidents of SEAH. Individuals may report incidents through multiple avenues, including anonymously if preferred:

1. **Direct Reporting to HR or Management:** Employees can directly report incidents to their supervisor, HR representative, or other designated personnel.
2. **Anonymous Reporting By E-mail:** Employees can report incidents anonymously via email to a designated confidential email address.

Individuals who report SEAH in good faith are protected from any form of retaliation. OTR guarantees that any attempts at retaliation will be met with strict disciplinary action.

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## 7. Investigation Process

- Reports will be reviewed by the Human Resources Department, and if verified, they will be referred to the Board of Directors.
  - All SEAH reports will be investigated promptly and thoroughly by the Board of Directors. Investigations will be conducted with confidentiality, transparency, and fairness for both the complainant and the accused. OTR Company is committed to conducting swift, impartial, and confidential investigations into all allegations of sexual exploitation, assault, and harassment.
  - The investigation process should be conducted in a manner that considers applicable laws and norms and respects the background of both the complainant and the respondent.
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## 8. Investigation Procedures:

1. **Initial Report:** Upon receiving a report, an initial assessment will be conducted to determine the severity of the allegations and the appropriate response.

2. **Investigation Team:** An investigation team will be formed, including individuals with relevant expertise and experience.
  3. **Confidentiality:** All information gathered during the investigation will be treated with strict confidentiality.
  4. **Witness Interviews:** Interviews will be conducted with the complainant, the accused, and any relevant witnesses.
  5. **Evidence Gathering:** Evidence will be collected and preserved, including written statements, documents, and other relevant materials.
  6. **Timely Conclusion:** Investigations will be conducted as promptly as possible, taking into account the complexity of the case.
  7. **Documentation:** All findings and decisions will be documented and securely stored.
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## 9. Response to SEAH Incidents

### 1. Survivor-Centered Approach:

OTR Company is committed to supporting those affected by SEAH by providing immediate protection, care, and access to necessary services (legal, medical, or psychological). Affected individuals will be given options to pursue formal or informal investigations and will be protected from any additional harm.

### 2. Corrective Actions:

- **Disciplinary Actions:** Appropriate disciplinary action will be taken against any individual found to have violated the SEAH policy.
  - **Preventive Measures:** Steps will be taken to prevent future SEAH incidents, such as implementing additional training, reviewing policies and procedures, or improving workplace culture.
  - **Legal Actions:** In some cases, OTR Company may report SEAH incidents to relevant authorities if the violation constitutes a criminal act under the law.
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## 10. Sanctions for Policy Violations

If SEAH is confirmed, OTR will take appropriate corrective actions, including disciplinary actions up to and including termination. OTR will also consider legal proceedings where necessary.

**The severity of the sanction will depend on the nature and severity of the offense.**

sanctions include:

1. **Written warning:** For minor infractions or first-time offenses.
2. **Suspension without pay:** For more serious offenses or repeated violations of the policy.
3. **Termination of employment:** For severe or egregious violations of the policy.

In addition to disciplinary action, OTR may report the incident to relevant authorities if required by law or if the offense constitutes a criminal act.

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## 11. Training and Awareness

OTR is committed to preventing sexual exploitation, abuse, and harassment through a comprehensive approach that includes induction up on employment to all staff, training, awareness-raising, and the creation of a positive and respectful workplace culture.

### 1. Training

OTR will implement mandatory induction up on hiring and training for all employees, contractors, and volunteers on:

- Understanding SEAH and its harmful impact.
- How to identify and prevent SEAH in the workplace and in project areas.
- How to report SEAH incidents using OTR's reporting mechanisms.
- OTR's zero-tolerance policy towards SEAH.

### 2. Awareness-Raising & Positive Workplace Culture

- **Open Communication:** OTR will foster an open and inclusive workplace culture where employees feel comfortable discussing issues related to sexual exploitation, abuse, and harassment.
  - **Respect and Dignity:** OTR will promote a workplace culture based on respect, dignity, and equality for all.
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## 12. Monitoring, Evaluation, and Review

### Monitoring

- **Policy Compliance:** Monitor adherence to the policy through regular reviews of internal procedures and practices.
- **Training Effectiveness:** Assess the impact of training programs on staff knowledge and behavior.
- **Incident Reporting:** Track the number and types of incidents reported.
- **Investigation Outcomes:** Monitor the timeliness and effectiveness of investigations.

## Evaluation

- **Policy Review:** Conduct periodic reviews of the policy to ensure its relevance and effectiveness.
  - **Impact Assessment:** Assess the overall impact of the policy on preventing and responding to SEAH.
  - **Staff Satisfaction:** Evaluate staff perceptions of the policy and its implementation.
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## 13. Data Privacy

- All data collected for monitoring and evaluation purposes will be handled in accordance with data protection regulations.
- Personal information will be kept confidential and used solely for the purpose of improving the policy and its implementation.

By implementing a robust monitoring and evaluation framework, OTR can identify areas for improvement, enhance the effectiveness of the PSEAH policy, and demonstrate its commitment to preventing and addressing SEAH.

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## 14. Conclusion

OTR Company is fully committed to upholding the highest standards of ethics and professional conduct.

We believe that creating a respectful, safe, and harassment-free environment, free from sexual exploitation, abuse, and harassment, is essential to fostering trust, inclusivity, and sustainable development.

We hold ourselves accountable to these standards and are committed to ensuring a safe and supportive environment for all.

I, the undersigned employee..... acknowledge that I have reviewed the Sexual Exploitation, Abuse, and Harassment (SEAH) policy and commit to adhering to it.

Signature: .....

Date: .....