



Sadhana Education Society's
SMT. KAPILA KHANDVALA COLLEGE OF EDUCATION

(AUTONOMOUS)

Permanently Affiliated to University of Mumbai & Recognised by NCTE

(Linguistic Gujarati Minority Institution - ESTD. 1962)

Juhu Road, Santacruz (West), Mumbai - 400 054.

Tel. : 2660 8747 Fax : 2660 8633 E-mail : kkbed@kkcoe.edu.in Website : www.kkcoe.edu.in

Dr. Jayashree Inbaraj

Principal

Policy title: Protection from Sexual Exploitation and Abuse (PSEA)

Policy objective:

To develop a policy of zero tolerance for sexual exploitation and abuse (SEA) for all KKCE employees, students, volunteers, consultants, partner organizations and all related personnel, both on-and off-duty and ensure that roles, responsibilities and expected standards of conduct in relation to SEA are known within KKCE.

To create and maintain a safe environment, free from SEA, by taking appropriate measures for this purpose, internally and in the communities where KKCE operates, through robust prevention and response work.

To create systems that prevent SEA, create conditions that make reporting easier and stress-free for victims and take corrective actions within a reasonable period.

Targeted Audience: All KKCE employees, students, trustees, volunteers, personnel and partner organisations.

Effective from Date: 5th July 2022

Mandatory Revision Date: 2nd December 2022

1. Policy statement:

1.1. SEA violates universally recognized international legal norms and standards and are unacceptable behaviors and prohibited conduct for all humanitarian workers, including all KKCE employees, students, volunteers, consultants, partner organizations and all related personnel, both on-and off-duty.

1.2. KKCE has a policy of zero tolerance towards SEA. all KKCE employees, students, volunteers, consultants, partner organizations and all related personnel, both on-and off-duty. are expected to uphold the highest standards of personal and professional conduct



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at all times, and to provide humanitarian assistance and services in a manner that respects and fosters the rights of beneficiaries and other vulnerable members of the local communities.

2. Scope of application:

2.1. This policy sets out the KKCE approach to prevent and respond to SEA. The policy applies to all KKCE employees, students, volunteers, consultants, partner organizations and all related personnel, both on-and off-duty.

3. Definitions:

3.1 For the purposes of the present policy the term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

3.2. Similarly, the term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. (UN)

3.3 Some examples of unwanted behaviour may include but not limited to the following

Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- The use of job-related threats or rewards to solicit sexual favours

Verbal conduct

- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the gender of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)

Non-verbal conduct

- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures



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- Whistling
- Leering

4. Commitment to PSEA:

4.1. KKCE will make every effort to create and maintain a safe environment, free from SEA, and shall take appropriate measures for this purpose in the communities where it operates, through a robust PSEA framework, including prevention and response measures.

4.2. This PSEA framework, affirms KKCE's commitment to the UN Secretary General's Bulletin on Special Measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13) and to achieving full, ongoing implementation of the IASC Six Core **Principles relating to SEA**

5. Six core principles:

Created by United Nations General Assembly resolution 46/182 in 1991, the Inter-Agency Standing Committee (IASC) is the longest-standing and highest-level humanitarian coordination forum of the United Nations system. KKCE commits to adhere to the Six Core Principles Relating to Sexual Exploitation and Abuse, 2019

KKCE also abides by the University Grants Commission (Prevention, prohibition and redressal of sexual harassment of women employees and students in higher educational institutions) Regulations, 2015. and abides by the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

5.1. PSEA by KKCE employees and related personnel constitute acts of gross misconduct and are therefore grounds for termination of employment

5.2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.

5.3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to beneficiaries.

5.4. Any sexual relationship between KKCE employees or related personnel and beneficiaries of assistance or other vulnerable members of the local community that involves improper use of rank





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or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.

5.5. Where an KKCE employee or related personnel develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same organization or not, he or she must report such concerns via established reporting mechanisms.

5.6. All KKCE employees and related personnel are obliged to create and maintain an environment which prevents SEA and promotes the implementation of this policy. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

6. PSEA framework:

6.1. Prevention:

6.1.1. Vetting: KKCE systematically vets all prospective job candidates in accordance with established screening procedures.

6.1.2. Training: KKCE holds mandatory induction and refresher trainings for all employees and related personnel on the organisation's SEA Policies and procedures. The training includes at a minimum:

- 1) a definition of SEA (that is aligned with the UN's definition);
- 2) a prohibition of SEA; and
- 3) actions that employees and related personnel are required to take (i.e. prompt reporting of allegations and referral of survivors).

6.2. Response:

6.2.1. Reporting: KKCE has safe, confidential and accessible mechanisms and procedures for personnel, beneficiaries and communities, including children, to report SEA allegations that and ensures that beneficiaries are aware of these. They are aware to whom they should report to and have been given the contact details of responsible members. KKCE also has a women's grievance cell and students grievance cell to address all kinds of issues related to sexual harassment Exploitation and abuse

6.2.2. Investigation: KKCE has a process for investigation of SEA allegations in place and shall properly and without delay conduct an investigation of SEA by its employees or related personnel



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or refer to the proper investigative body if the perpetrator is affiliated with another entity. This is done in accordance with the University Grants Commission (Prevention, prohibition and redressal of sexual harassment of women employees and students in higher educational institutions) Regulations, 2015

6.2.2.1. Referral to National Authorities: If, after proper investigation, there is evidence to support allegations of SEA, these cases may be referred to national authorities for criminal prosecution.

6.2.3. Victim assistance: KKCE has a system to promptly refer SEA survivors to available services, like counselling and legal help based on their needs and consent.

6.3. Cooperative arrangements:

6.3.1. All KKCE's contracts and partnership agreements include a standard clause requiring contractors, suppliers, consultants and sub-partners to commit to a zero-tolerance policy on SEA and to take measures to prevent and respond to SEA.

6.3.2. The failure of those entities or individuals to take preventive measures against SEA, to investigate allegations thereof, or to take corrective action when SEA has occurred, shall constitute grounds for termination of any cooperative arrangement

Jayal

