

# International Development Research Centre

## Corporate Policy

### Preventing and Responding to Sexual Exploitation, Abuse and Harassment

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#### 1. Policy Statement

The International Development Research Centre (IDRC) champions and funds research and innovation within and alongside developing regions to drive global change. As an organization that works towards a more sustainable and inclusive world, IDRC places human rights and dignity at the centre of its work. The Centre is committed to preventing where possible, and responding where necessary, to sexual exploitation, abuse and harassment (SEAH) in the delivery of its mandate.

IDRC recognizes that SEAH is a critical global challenge that, too often, impacts particular groups of people<sup>1</sup> due to systemic inequalities and vulnerabilities. SEAH violates universally recognized international legal norms and standards<sup>2</sup> and is prohibited conduct for IDRC Employees, IDRC Governors, and IDRC Partners. IDRC is also committed to creating and fostering a respectful, diverse, equitable and inclusive workplace, as reflected in the Centre's Code of Conduct.

IDRC has a zero-tolerance approach to inaction against SEAH in the delivery of its research for development mandate and during its research activities. We take seriously all reports of SEAH, will not tolerate SEAH in any form in the delivery of our mandate, and will ensure our actions are guided by a recognition that all survivors<sup>3</sup> should be treated with dignity and respect.

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<sup>1</sup> Groups more likely impacted by SEAH due to systematic inequalities include but are not limited to women, vulnerable adults, children, LGBTQIA2S+ and marginalized groups.

<sup>2</sup> Please refer to the 'Related Reference Documents' section for a non-exhaustive list of key international legal norms and standards relating to SEAH.

<sup>3</sup> IDRC has used the term 'survivor' for the purposes of this policy. The Centre will respect the choice of an individual who has experienced SEAH, to identify as either victim or survivor.

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IDRC supports programs that promote gender equality and inclusion<sup>4</sup> while preventing and mitigating gender-based violence. In addition to addressing individual instances of SEAH, IDRC acknowledges the need to address the underlying drivers of SEAH through transformative gender programming.

IDRC commits to creating and maintaining a comprehensive approach to the prevention of and response to SEAH. This approach is one that encompasses prevention, response, and mitigation, and supports collective efforts to strengthen the international system's capacity to manage and mitigate the risk of, and response to, SEAH.

IDRC will work with partners to reinforce safeguarding measures in relation to its activities. The Centre will address and respond to SEAH, including any potential abuses of power, related to the delivery of its mandate, to hold people to account and protect those in more vulnerable situations.

All of us have a responsibility to address these issues. By doing so, we can all help prevent and address SEAH and provide survivors with the support they deserve, while adhering to the principles of procedural fairness.

## 2. Purpose

It is imperative that we all understand the problem of SEAH and our role and responsibility in preventing and addressing it. This policy sets out IDRC's commitment to creating and maintaining a safe environment, free from SEAH, in line with safeguarding, prevention and mitigation good practices. This includes ensuring SEAH prevention measures are in place, that effective action is taken when problems occur and that survivors receive the support they deserve.

IDRC has consulted with a cross section of the communities we work with, as well as key stakeholders, and good practice guidance, to inform the content of this policy, with the purpose of creating an inclusive, accessible and survivor-centred Preventing and Responding to Sexual Exploitation, Abuse and Harassment (PSEAH<sup>5</sup>) Policy.

## 3. Scope and Application

This policy applies to all IDRC Employees, IDRC Governors and IDRC Partners, defined as<sup>6</sup>:

- IDRC Employees – refers to all IDRC employees regardless of position or status, including Ottawa hired and locally engaged staff, students, casual employees, employees on leave, employees on secondment and interchange, and IDRC Research Award Recipients.
- IDRC Board of Governors – refers to all Governors of IDRC appointed by the Governor in Council pursuant to the *International Development Research Centre Act*.
- IDRC Partners – refers to individuals and entities who are in receipt of IDRC funding and/or engaged in the delivery of IDRC's mandate, including: grant recipients and sub-

<sup>4</sup> IDRC's Gender Equality and Inclusion resources can be accessed at IDRC's Resource Centre [here](#).

<sup>5</sup> IDRC has used the acronym, "PSEAH", to reference its Preventing and Responding to Sexual Exploitation, Abuse and Harassment efforts. The Centre recognizes that the acronym "PSEAH" is the widely referenced term within the international community and has used the term "PSEAH" rather than "PRSEAH" for the purposes of this policy.

<sup>6</sup> Please refer to the 'Definitions' section for a list of key terms.

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recipients, consultants, contractors, suppliers, and other external service providers in support of program and evaluation delivery; and IDRC's donor Partners<sup>7</sup>, where applicable.

This policy addresses the behavior of IDRC Employees, IDRC Governors and IDRC Partners towards Third Parties and is distinct from violence and harassment (including sexual violence and harassment) in the workplace at IDRC. The applicable framework for workplace harassment and violence, including workplace sexual harassment, is IDRC's Workplace Harassment and Violence Prevention Policy and Resolution Procedures, coupled with the statutory framework under Part II of the *Canada Labour Code* and the *Workplace Harassment and Violence Prevention Regulations*.

This policy operates in conjunction with the IDRC Code of Conduct.

For further reading, please refer to the:

- IDRC Statement on Preventing Sexual Exploitation, Abuse and Harassment
- IDRC Code of Conduct
- IDRC Disclosure on Wrongdoing policy
- IDRC Conflict of Interest policy
- IDRC Acceptable Use Policy for Centre Information and Electronic systems
- IDRC Workplace Harassment and Violence Prevention Policy and Resolution Procedures
- IDRC Locally Engaged Staff Manuals

More detailed guidance relating to safeguarding issues, including but not limited to research-focused safeguarding challenges, digital safeguarding, child safeguarding, survivor support and investigations, will be responded to in IDRC Safeguarding Standard Operating Procedures (SOPs).

#### 4. Definitions

**Best interests of the child** — primary consideration must be given to the child's wellbeing in actions concerning a child due to the child's dependency, maturity, legal status and often "voicelessness", in balance with procedural fairness.

**Child/Children** — refers to person(s) under the age of 18.

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<sup>7</sup> This policy is applicable to IDRC's Partners once the relevant contract has been signed for the purposes of the partnership relationship.

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**IDRC Employees** — refers to all IDRC employees regardless of position or status, including Ottawa hired and locally engaged staff, students, casual employees, employees on leave, employees on secondment and interchange, and IDRC Research Award Recipients.

**IDRC Governors** — refers to all Governors of IDRC appointed by the Governor in Council pursuant to the International Development Research Centre Act.

**IDRC Partners** — refers to individuals and entities who are in receipt of IDRC funding and/or engaged in the delivery of IDRC's mandate, including: grant recipients and sub-recipients, consultants, contractors, suppliers, and other external service providers in support of program and evaluation delivery; and IDRC's donor partners where applicable.

**Sexual exploitation** — refers to any actual or attempted abuse of a person in 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.

**Sexual abuse** — refers to an actual or threatened physical intrusion of a sexual nature, whether by force, coercion or under unequal conditions. This would include forced marriage and sexual slavery and also includes sexual activity with a child (any person under the age of 18).

**Sexual harassment** — refers to any unwelcome conduct of a sexual nature, that might reasonably be expected or be perceived to cause offense or humiliation.

**Subject of Complaint** — The person against whom the allegation, concern or suspicion has been raised.

**Survivor-centred Approach** — A survivor-centred approach creates a supportive environment in which the survivor's rights and wishes are respected, their safety is ensured as far as possible, and they are treated with dignity and respect, in balance with procedural fairness.

**Third Parties** — refers to any person who benefits, directly or indirectly, from IDRC's mandate (e.g., those individuals who are direct or indirect recipients of IDRC's assistance, work, and activities and those individuals who are in communities where IDRC works and/or operates).

**Survivor** — refers to a person who has experienced SEAH, including those who self-identify as a victim or survivor. An individual's choice of how to identify (as victim or survivor) will be respected.

**Zero tolerance** — refers to an approach of not allowing and accepting any form of violations, undesirable behaviours and acts that are in contravention of the policy, and ensuring all allegations are treated seriously, investigated and where allegations are confirmed through investigation, disciplinary action is taken as a result, including dismissal.

## 5. Core Principles

IDRC abides by the Six Core Principles relating to Sexual Exploitation and Abuse by the Inter-Agency Standing Committee (IASC) Working Group on Prevention and Response to Sexual Exploitation and Abuse.

1. Sexual exploitation, abuse and harassment constitute acts of gross misconduct and are therefore grounds for termination of employment.

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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.
3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited.
4. Any sexual relationship between those affiliated with IDRC and Third Parties involving improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of IDRC's work.
5. IDRC Employees, IDRC Governors, and IDRC Partners must report any incident, allegation, concern and/or suspicion of SEAH via IDRC's range of reporting mechanisms.
6. All individuals affiliated with IDRC's mandate are expected to create and maintain an environment which prevents sexual exploitation, abuse and harassment, and promotes the implementation of IDRC's Code of Conduct. IDRC Managers and Supervisors at all levels have particular responsibilities to support and develop systems which maintain this environment.

While the IASC was developed for the delivery of humanitarian assistance, IDRC is committed to interpreting and applying these principles, in line with its research for development mandate and as delineated in this policy, subject to IDRC's obligations under Canadian law.

## 6. Roles and Responsibilities

### 6.1 IDRC Employees, IDRC Governors and IDRC Partners

IDRC Employees, IDRC Governors, and IDRC Partners **must never**:

- Engage in any form of SEAH whatsoever.
- Engage in activities or relationships with individuals involved in IDRC's mandate that are sexually exploitative, abusive or harassing.
- Request or imply a request for any service or sexual favour from members of the communities in which IDRC works and/or operates (e.g. Third Parties), in return for anything – including money, assistance or employment.
- Support or take part in any form of sexually exploitative, abusive or harassment activities, including child pornography or human sex trafficking.
- Engage in sexual activity with a person under the age of 18 regardless of the local age of majority or age of consent (mistaken belief of the age of the person is not a defence).

IDRC Employees, IDRC Governors, and IDRC Partners **must**:

- Take all necessary measures to prevent and respond to SEAH in line with this policy, and to uphold the vision and core values of IDRC.

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- Treat all individuals involved in IDRC's mandate and other IDRC Employees, IDRC Governors, and IDRC Partners with dignity and respect; challenge attitudes and behaviours that contravene the principles laid out in this policy.
- Actively contribute to creating and maintaining a culture that prevents SEAH, encourages reporting, and promotes implementation of this policy.
- Be aware that SEAH is strictly prohibited, and that the first IASC Core Principle provides that SEAH<sup>8</sup> constitutes gross misconduct and is a ground for termination of employment (or other relationship).
- Declare any previously existing sexual relationships with individuals involved in IDRC's mandate and/or individuals under the age of 18, to their manager, supervisor or to the Safeguarding Specialist, and receive related guidance on this.
- Adhere to this policy and report any incident, allegation, concern and/or suspicion of SEAH by any IDRC Employees, IDRC Governors and/or IDRC Partners.
- Treat any information communicated to them in connection with SEAH as confidential, including information related to an investigation into any incident, allegation, concern and/or suspicion of SEAH.
- Cooperate fully, promptly and in good faith in any investigation of SEAH under this policy.

#### 6.2 IDRC Managers and Supervisors

IDRC Managers and Supervisors must:

- Take responsibility for creating and maintaining an environment that prevents SEAH, encourages reporting, and promotes implementation of this policy.
- Make every effort to ensure that all IDRC Employees understand and comply with this policy, including engaging in relevant orientations, awareness raising training and refresher courses.
- Report any known incident, allegation, concern and/or suspicion of SEAH.
- Ensure that any incident, allegation, concern and/or suspicion of SEAH is promptly and adequately addressed in a way that demonstrates fairness, impartiality, and respect for confidentiality, and is free from gender bias, intimidation or favouritism.

#### 6.3 IDRC Safeguarding Specialist

The IDRC Safeguarding Specialist will:

- Design, implement, maintain, and assess this policy, related procedures, and systems to prevent, respond to, and mitigate SEAH in line with IDRC's mandate.

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<sup>8</sup> This would include sexual harassment as IDRC is committed to interpreting and applying the IASC principles to preventing and responding to sexual harassment, in line with the spirit of the IASC principles.

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- Promote prevention, response, and mitigation of SEAH and develop organizational approaches and activities, including rolling out training and learning programs on safeguarding for IDRC Employees, IDRC Governors, and IDRC Partners.
- Collaborate on safeguarding within the sector to stay abreast of evolving good practice guidelines and continuously improve reinforcement of PSEAH at IDRC and with IDRC Partners.
- Provide progressive support to project implementers in embedding and continuously enhancing safeguarding measures at each stage of programme delivery. This may include supporting partners in developing related policies, delivering “train the trainer” safeguarding sessions, and assisting partners in engaging communities in the development of tailored, inclusive and accessible reporting mechanisms<sup>9</sup>.
- Provide robust and accountable case management of any incident, allegation, concern and/or suspicion of SEAH, including investigation, secure documentation and response on behalf of IDRC.
- Ensure that reviews and investigations comply with confidentiality requirements and principles of procedural fairness.
- Identify SEAH, Child Protection and Gender-Based Violence (GBV) referral services which survivors may need urgent referral to, and conduct timely, safe and appropriate urgent referrals.
- Recognize and facilitate holistic support to survivors as appropriate throughout their engagement with IDRC incident reporting procedures.
- Ensure lessons learned are captured, in an anonymized manner, to preserve confidentiality and support improved implementation by IDRC as appropriate.

#### 6.4 IDRC President

The IDRC President will:

- Ensure that all IDRC Employees and IDRC Governors are aware of this policy, through training and other operational measures to uphold this policy and prevent SEAH.
- Oversee the roll-out of appropriate mechanisms to support IDRC Partner awareness and understanding of this policy. This may include setting out a collective vision for PSEAH action, overseeing safeguarding training implementation, and refresher course delivery.
- Ensure that IDRC has established processes and procedures in place to support the implementation of all aspects of this policy.
- Ensure sufficient resources are allocated for prevention, response and survivor support as appropriate.

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<sup>9</sup> IDRC recognizes that embedding and reinforcing safeguarding measures at all stages of programme delivery is a continuous effort and as such, the realization of this responsibility will be progressive.

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- Oversee timely and appropriate action against those found to have breached this policy. This may include administrative or disciplinary action, and/or referral to the relevant local authorities if appropriate and safe to do so.
- Report progress to the Board on an annual basis, including on the number of allegations of SEAH, the number of founded instances of SEAH, actions taken and lessons learnt.

#### 7. Working with IDRC Partners

Relationships with IDRC Partners are based on mutual respect of inclusive values and beliefs.

In addition to IDRC Partners' roles and responsibilities outlined above in this policy, IDRC Partners have a responsibility to follow international good practices and to adopt practices and measures that prevent and respond to SEAH.

IDRC Partners must inform IDRC of any incident, allegation, concern and/or suspicion of SEAH relating to IDRC partner funding.

IDRC Partners must respond and act on any incident, allegation, concern and/or suspicion of SEAH whether reported within their own organizations or to IDRC. IDRC will, where appropriate, work with the partner in responding to the incident through an independent investigation.

IDRC Partners are expected to follow the IASC Six Core Principles and have mechanisms in place to receive and respond to reports of SEAH.

IDRC Partners have a responsibility to take steps and adopt practices that prevent and respond to SEAH, as well as provision of support as necessary for survivors.

#### 8. Reporting

IDRC undertakes to maintain multiple reporting mechanisms to eliminate as many potential barriers to SEAH reporting as possible. Reporting mechanisms are reviewed with the communities IDRC engages with and updated on a regular basis so that they are inclusive, accessible and contribute to a culture that encourages reporting of SEAH.

IDRC Employees, IDRC Governors, and IDRC Partners must report any incident, allegation, concern and/or suspicion of SEAH related to the delivery of IDRC's mandate through IDRC's reporting mechanisms. IDRC Employees may speak to their manager, supervisor or the Safeguarding Specialist, or they may make a confidential report through IDRC's other reporting mechanisms.

IDRC Partners and Third Parties may confidentially report any incident, allegation, concern and/or suspicion of SEAH by IDRC Employees, IDRC Governors, and/or IDRC Partners using any of IDRC's reporting mechanisms, including contacting their IDRC Program Officer, IDRC's Safeguarding Specialist, or by making a confidential report through IDRC's other reporting mechanisms.



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#### TO REPORT A SAFEGUARDING CONCERN OR TO ACCESS SUPPORT, PLEASE DO ANY OF THE FOLLOWING:

- Submit a report via our incident reporting platform at <https://cloud.clearviewconnects.com/>
- Call our incident reporting hotline at +1 (866) 737-3512 for assistance in English or French (toll-free within Canada and the US)
- Contact the IDRC safeguarding specialist at [safeguarding@idrc.ca](mailto:safeguarding@idrc.ca)
- Contact your manager or supervisor (as applicable to IDRC Employees)
- Contact your IDRC program officer or program director (as applicable to IDRC Partners and Third Parties)

This reporting requirement is limited to any incident, allegation, concern and/or suspicion of SEAH in the delivery of IDRC's mandate. All individuals are encouraged to report as soon as possible after becoming aware of any such incident, allegation, concern and/or suspicion.

The Safeguarding Specialist, reporting to the President, is IDRC's designated representative for receiving and reviewing reports of SEAH.

IDRC recognizes that the decision to report any incident, allegation, concern and/or suspicion of SEAH can be difficult and will support those who make such a report, whether or not their report is upheld.

IDRC recognizes survivors' entitlement to specialized services and will provide appropriate and safe referral information and support regardless of an investigation going ahead. In particular, IDRC acknowledges the importance of and commits to providing timely referral information in relation to SEAH-related medical concerns and support needs requiring prompt follow-up.

## 9. Investigations

IDRC will review and investigate, as appropriate, any reported incident, allegation, concern and/or suspicion of SEAH in a timely, fair, and professional manner. IDRC will use appropriate techniques and practices according to the nature of the reported incident, allegation, concern and/or suspicion. Reports will first be reviewed internally. Depending on the nature of the reported incident, allegation, concern and/or suspicion of SEAH, IDRC may investigate reports internally or secure external investigative expertise as appropriate.

Investigations will be conducted in a fair, transparent, and impartial manner.

Depending on the nature of the reported incident, allegation, concern and/or suspicion of SEAH, reports may be referred to local authorities or relevant law enforcement agencies where appropriate or as required by law. IDRC will always keep in mind the importance of survivor safety and best interest of the child, balanced against considerations of procedural fairness.

The person conducting the investigation will consult with the survivor and undertake an initial risk assessment to identify and implement immediate reasonable measures to protect and support the survivor.

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Survivors are entitled to be accompanied by a support person of their choice for assistance or cooperation during an investigation. The support person cannot be a material witness to the case and must not interfere during investigation interviews or meetings.

IDRC will take steps to provide appropriate assistance to survivors. IDRC will provide survivors with safe, appropriate and time sensitive assistance or referrals to competent support services. IDRC upholds survivors' entitlement to assistance or specialized support services, irrespective of whether the survivor initiates or cooperates with an investigation.

#### **10. Consequences**

IDRC will take appropriate action with respect to IDRC Employees, IDRC Governors, and IDRC Partners found after fair process to have contravened this policy.

IDRC Employees who contravene this policy will be subject to disciplinary action, up to and including termination of employment.

IDRC Partners who contravene this policy may be subject to subsequent measures, up to and including withdrawal of funding and the termination of contract or other relationship.

IDRC Partners whose employees, contractors and related personnel contravene this policy must report to IDRC and conduct appropriate internal investigations. Failure to do so may result in the withdrawal of funding and the termination of their relationship with IDRC.

Any consequences of contravention of this policy by IDRC Governors will be determined with the appropriate appointing authority.

IDRC reserves the right to report the facts related to the SEAH report to the relevant national and home country authorities if appropriate and safe to do so.

#### **11. No Retaliation or Coercion**

IDRC will not tolerate any retaliation (or reprisal) against any individual who makes a report of SEAH or who participates in an investigation. Retaliation will be considered a violation of this policy and will result in disciplinary action, up to and including termination of employment, contract or other relationship. Coercion aimed at preventing reporting will be dealt with in the same way as retaliation.

#### **12. Training and Learning**

IDRC will ensure that all new and existing IDRC Employees are made aware of this policy and the IDRC Code of Conduct during orientation.

Additional training and/or learning resources will be provided periodically to IDRC Employees, IDRC Governors, and IDRC Partners to facilitate ongoing awareness and understanding of safeguarding good practice guidelines, particularly as the field evolves or when policies or processes are updated.

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#### 13. Policy Review

Recognizing the need to ensure IDRC's prevention, response and mitigation practices are aligned and evolve with international good practice guidelines, IDRC will review and update, as required, this policy and associated processes and procedures on an annual basis.

#### 14. Related Reference Documents

Core Humanitarian Standard. [The CHS: Nine commitments to people affected by crises.](#)

Cooperation Canada. [Leaders' Pledge on Preventing and Addressing Sexual Misconduct.](#)

Global Affairs Canada. [Sexual exploitation and abuse in international assistance.](#)

IDRC. [Resources for IDRC grantees.](#)

OECD. [DAC Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance: Key Pillars of Prevention and Response.](#)

The United Nations Inter-Agency Standing Committee (IASC). [The United Nations Inter-Agency Standing Committee \(IASC\) Six Core Principles.](#)

UNHCR. [Secretary-General's Bulletin: Special measures for protection from sexual exploitation and sexual abuse.](#)

UNHCR. [Convention on the Rights of the Child.](#)

UNSG. [Voluntary Compact on Preventing Sexual Exploitation and Abuse.](#)