



Room to Read Policy

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

Policy Owner: Chief Executive Officer

Creation Date: August 2023

Policy Number: 200WW

Purpose:

Room to Read is committed to protecting all children and adults within the communities in which we work and believes that all individual people have equal rights to protection. The purpose of the Protection from Sexual Exploitation and Abuse (PSEA) policy (“Policy”) is to explain the essential principles and rules that reflect the behaviors and standards expected from all individuals associated with Room to Read. It is the companion policy to [Room to Read’s Child Protection Policy \(CPP\)](#).

Applicability:

This Policy is concerned with the protection from sexual exploitation and abuse of adults (anyone 18 years old or more) and applies to all “Room to Read Representatives,” i.e. all persons working for Room to Read or on our behalf in any capacity on or off duty, which includes all worldwide employees, Board members, volunteers, interns, vendors, contractors, and implementation partners, as well as any Room to Read approved visitors to Room to Read programs.

Principles:

Sexual exploitation and abuse are serious violations of fundamental human rights and will not be accepted or tolerated at Room to Read. Room to Read Representatives are prohibited from committing acts of sexual exploitation and sexual abuse. All children and adults should be treated with respect and dignity and have equal right to protection. All children and adults have the right to be free from abuse and exploitation, including maltreatment, and physical, mental, or sexual violence, injury, or abuse. Vulnerable and marginalized adults are particularly at risk of exploitation and abuse. Room to Read is committed to acting ethically and with integrity in all business dealings and relationships.

For more information on Room to Read’s policy specific to child protection, please refer to [Room to Read’s Child Protection Policy \(CPP\)](#).

Room to Read is committed to ensuring our approach to PSEA is consistent with our national and international disclosure obligations, and will comply with all laws, statutes, regulations, and codes including applicable laws in the countries where Room to Read operates.

Policy:

Room to Read Representatives are obliged to create and maintain an environment that prevents sexual exploitation and sexual abuse. Managers at all levels have a particular responsibility to support and develop systems that maintain this environment. Room to Read implements a survivor-centered approach, which aims to put the rights and dignity of the survivor at the forefront of all actions and ensure that the survivor is treated with respect.

Prohibition of sexual exploitation and sexual abuse

Sexual exploitation and sexual abuse constitute acts of serious misconduct and are therefore grounds for disciplinary measures, up to and including termination. All Room to Read Representatives are prohibited from committing acts of sexual exploitation and sexual abuse, which refers to all forms of inappropriate conduct of a sexual nature, whether in-person or online. This includes, but is not limited to:

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

- Sexual relationships between staff and beneficiaries of assistance, since they are based on inherently unequal power dynamics, and undermine the credibility and integrity of the work of Room to Read;
- Sexual activity with commercial sex workers in countries where Room to Read is delivering programming; including in countries where sex work or paying for sex work is legal; and
- Use of an individual to procure sex for others.

The standards set out above are not intended to be an exhaustive list. Other types of sexually exploitive or sexually abusive behavior may also be grounds for administrative action or disciplinary measures, including termination.

Awareness:

Room to Read will make Room to Read Representatives aware of the high standards of behavior and conduct expected of them to protect adults from any form of sexual exploitation and abuse. Room to Read will raise awareness within the populations we serve about this Policy including reporting channels.

Prevention:

Room to Read will ensure, through awareness and good practice, that Room to Read Representatives minimize the risks of any form of sexual exploitation and abuse, including conducting relevant vetting and background checks of staff as part of the recruitment process.

Reporting:

Room to Read Representatives must take appropriate action in cases where there is reason to believe that any of the standards listed in this Policy have been violated or any behavior referred to has occurred. All incidents must be dealt with promptly and kept confidential, to the extent possible, and in a manner that does not harm the survivor or the person reporting it. Should a Room to Read Representative develop concerns or suspicions regarding sexual exploitation or sexual abuse by another Room to Read Representative, they must report the incident in the following manner:

- Violations or suspected violations of this Policy should be reported within 24 hours of a Room to Read Representative learning of a violation or suspected violation. Reports may be made through several channels:
 - Country Director or Project Manager
 - Any People Operations personnel
 - Any supervisor
 - General Counsel
 - Through the reporting channels provided under the [Whistleblower Policy](#) including emailing whistleblowerhotline@roomtoread.org
- Room to Read will, as appropriate, relay to local authorities any report it receives that, if true, would be a violation of law, taking into consideration mandatory reporting laws and regulations, and any potential harm to the survivor and/or the person reporting the incident. Room to Read will cooperate with local authorities investigating reports of sexual abuse and exploitation.

Responding:

All reports of sexual abuse, exploitation, or any violation of this Policy will be treated seriously and handled with sensitivity.

- All reports received by Room to Read Representatives, no matter how received, must be immediately forwarded to Room to Read's General Counsel and the Senior Director of Global People Operations, who will determine the appropriate next steps (any investigations will be conducted properly without undue delay).
- Any Room to Read Representative who fails to report known or suspected violations of this Policy immediately, will be subject to disciplinary action, up to and including termination.

- Room to Read will not coerce, intimidate, or retaliate in any way against anyone who in good faith reports any form of known or suspected sexual abuse or exploitation, or provides any information or other assistance in an investigation.
- Alleged survivors of sexual exploitation or abuse will be promptly informed of and referred to available professional assistance, upon their consent.

Definitions of Sexual Exploitation and Abuse:

Sexual exploitation refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust, or dependency, for sexual or sexualized purposes. This includes the offer or promise of monetary, social, political benefits as an incentive or form of coercion, and profiting from the sexual exploitation of another person. It may also include threatened or actual nonphysical intrusion for sexual or sexualized purposes (including unwanted and/or uninvited exposure to pornography, texts, images; the sharing of images, texts; demands for sexualized photographs; etc.).

Sexual abuse refers to the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Consequences for Violations:

Room to Read Representatives who violate this Policy will be subject to disciplinary action, up to and including termination of employment, engagement, contract or other relationship with Room to Read.

Contact Department:

Any questions regarding this Policy should be directed to the General Counsel or the Senior Director Global People Operations.

Related Policies:

[Child Protection Policy 101WW](#); [Anti-Trafficking Policy 102WW](#); [Whistleblower Policy 202WW](#); [No Harassment Policy 201WW](#).