

CPP037 Safeguarding and Cefas' Sexual Exploitation, Abuse, and Harassment (SEAH) Policy within International Development

Purpose

Cefas expects the highest moral and ethical standards from those we employ, and from those we work with through our international programmes which provide support and services to people and their communities. When working in international development, SEAH must be regarded as one of the most important pillars of Safeguarding to be abided by and vigilant for. Where we work with partners we will ensure, through our procurement / engagement practices, that beneficiaries and delivery partners are aware of their obligations in the Safeguarding space, and in particular to SEAH. Beneficiaries must always be put first, by Cefas and by its partners and the principle of 'Do No Harm' is paramount, during any type of engagement with them.

Policy

Safeguarding means preventing harm abuse and neglect to people and the environment. The risks of harm from a particular type of exploitation to beneficiaries of Official Development Assistance (ODA) also known as International Aid were highlighted by the Aid Sector scandal in early 2018 and has resulted in an increased focus on Sexual Exploitation, Abuse and Harassment (SEAH), a major subset of Safeguarding policy which is particularly important when engaging with people and communities worldwide. This Policy highlights the Cefas approach to SEAH for our international development programmes and was developed from initial guidance on Safeguarding against Sexual Exploitation and Abuse and Harassment (SEAH) in the aid sector from the [FCDO](#).

From 2025, Cefas have integrated [CAPSEAH](#), the Common Approach to Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment into this policy.

CAPSEAH aims to:

- Prevent SEAH and improve accountability and support to victim-survivors when it occurs.



- Amplify existing standards as the basis for a stronger, more aligned approach.
- Set expectations about behaviours and minimum actions to protect from SEAH.

Cefas believes that everyone involved in programmes and projects, regardless of age, gender identity, disability, sexual orientation, religion, ethnic origin or any other protected characteristic has the right to be protected from all forms of harm, abuse, exploitation, harassment and neglect. Cefas will not tolerate abuse and/or exploitation and harassment by staff or associated personnel involved in any international programmes or projects Cefas or its commissioned partners are involved in and takes a zero-tolerance approach to inactions regarding Safeguarding and SEAH as well.

It is a mandatory responsibility of delivery partners or organisations that are delivering components of a programme or projects; to have appropriate and proportionate safeguarding policies and procedures and it is the responsibility of the senior project leader within Cefas to seek assurance that these are in place. As a minimum they should provide their Safeguarding and SEAH policies, their bully and harassment policies, their own reporting arrangements and the minimum training given to their employees.

All delivery partner/organisation's safeguarding policy should clearly set out procedures that seek to prevent and address SEAH and have clear behavioural expectations of all staff and associated personnel that apply in all countries in which work is being delivered. This should include the requirement that "staff must not engage in sexual activity with anyone under the age of 18, regardless of the legal age of consent in the country in which aid is being delivered." as a minimum. Additionally engaging in the use of prostitutes, even if legal within the countries that Programmes are being delivered, will not be tolerated from staff or partners whilst being deployed on those Programmes

Cefas expects all partners and organisations delivering projects to commit to addressing SEAH throughout their work, through the safeguarding cycle of identify, prevent, report, respond and learn. Our zero-tolerance position towards inaction extends to Cefas staff / delivery partner staff who find themselves, through their work on programmes and projects, exposed to SEAH and direct these cases to our policy CP010-06 on harassment in the workplace (available upon request). Additionally, programmes specific Risk Assessments are available upon request.

SEAH is an organisational risk and therefore measures are required to span all organisational activity where there is direct or indirect contact with people. This activity includes general operations, procurement, programmers, activities, communication, recruitment, management, policies and procedures, culture, mission and values.

Reporting

Cefas has a confidential mechanism for reporting any Safeguarding and SEAH incident that occurs or is witnessed during an international programme. The initial requirement is to report



any potential incident to the 'Need to Know' team via the ['intsafeguarding@cefas.gov.uk'](mailto:intsafeguarding@cefas.gov.uk) email address. This will then be dealt with confidentially following our guidance and procedures.

Training

There is a minimum requirement for training that is expected from Cefas and its partners in regard to Safeguarding and SEAH. In order to raise awareness, the online course provided by Kaya '[Safeguarding Essentials](#)', must be completed by all persons working on international programmes and projects. Additionally, a bespoke 1-day SEAH training course should also be completed when access is available. More details of this course can be obtained from the Cefas International Safeguarding lead on request.

Safeguarding Children in International Programmes

Cefas, its partners and the stakeholders we engage with must follow the FCDO compiled guidance on [Child Safeguarding Due Diligence](#) for organisations delivering programmes that will involve them coming into contact directly or indirectly with children. These are designed to ensure UK Government funded programmes and operations do not put children at risk of harm and to enable them to respond appropriately when concerns and incidents arise.

Sexual Abuse, Sexual Exploitation and Sexual Harassment (SEAH)

Cefas are committed to a culture of zero tolerance to sexual exploitation, sexual abuse and sexual harassment in all that we do.

Sexual Exploitation, Abuse and Harassment (SEAH) is made of the following terms;

- Sexual exploitation: any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. Includes profiting momentarily, socially, or politically from sexual exploitation of another. Under UN regulations it includes transactional sex, solicitation of transactional sex and exploitative relationship;
- Sexual abuse: the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It should cover sexual assault (attempted rape, kissing / touching, forcing someone to perform oral sex / touching) as well as rape. Under UN regulations, all sexual activity with someone under the age of 18 is considered to be sexual abuse;
- Sexual harassment: a continuum of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating.

There are strong links between power and safeguarding from SEAH. If a person has more power, they have more opportunity to exploit, abuse and harass others. If a person has less



power, they are more likely to be targeted for exploitation, abuse, and harassment. These people tend to include children, women, and other marginalised groups, for example indigenous groups.

Application

This policy applies to all Cefas staff ,our partners and any stakeholder that is engaged with during the course of the programmes being delivered. Relevant disciplinary procedures will be instigated against any party that violates this policy in any regard.

Additionally, for Cefas staff and partners that are part of the Civil Service, we are also bound by the [Civil Service Code](#), that sets out the core values and standards of behaviour expected of all civil servants. These values are:

Integrity – putting the obligations of public service above personal interests.

Honesty – being truthful and open.

Objectivity – basing advice and decisions on rigorous analysis of the evidence.

Impartiality – acting solely according to the merits of the case and serving governments of different political persuasions equally well.

Monitoring

As UK government policy develops in this area from guidance issued by the FCDO in November 2022, this policy will be updated as required to ensure Cefas' is compliant. Additionally, the Safeguarding Lead within Cefas will regularly monitor other policies that relate to Safeguarding and SEAH and update this policy as needed.

Legislation (or Regulation)

Include any Legislation or Regulations relevant to the policy

I fully support this policy.

A handwritten signature in black ink, appearing to read "Tim Green", written over a light blue rectangular background.

Tim Green

Interim Chief Executive