



# Prevention of Sexual Exploitation, Abuse and Harassment Policy

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## I. Commitment & Purpose

D-tree is committed to creating a safe, respectful, and inclusive environment for all individuals we serve and engage with. This policy aims to protect beneficiaries and individuals served by D-tree from sexual exploitation, abuse, and harassment ensuring accountability and safeguarding measures across all activities.

## II. Scope

This policy applies to all D-tree employees, consultants, contractors, subrecipients, partners, interns and volunteers engaged with the organization in any capacity, both during and outside of working hours. D-tree shall include provisions for compliance with this policy in all subawards.

## III. Definitions

**D-tree Representatives:** All D-tree staff (full-time, part-time and interns), volunteers, contractors, consultants, visitors, partners, and sub-organizations acting on behalf of D-tree.

- **Visitors:** Individuals (e.g., clients, officials, donors, researchers, suppliers) temporarily engaged with D-tree through activities, events, or visits. While not under D-tree's direct authority, they are expected to uphold D-tree's safeguarding standards. Violations may result in appropriate actions, including reporting to authorities.

**Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, power, or trust for sexual purposes, including but not limited to profiting monetarily, socially, or politically from the exploitation of someone else.

**Sexual Abuse:** Physical intrusion of a sexual nature by force, coercion, or through unequal conditions.

**Beneficiaries:** Beneficiaries are individuals and communities who receive, access, or benefit from D-tree's programs, services, or interventions. This includes patients and clients receiving healthcare, digital health support, or other forms of assistance facilitated by D-tree; community members within the geographic areas where D-tree operates who are directly or indirectly impacted by its programs; healthcare workers

and volunteers, including community health workers, frontline health personnel, and others supported, trained, or engaged by D-tree programs; program participants enrolled in or benefiting from D-tree-supported initiatives, training, or research activities; and individuals receiving services or support through partner organizations collaborating with D-tree in program implementation. D-tree is committed to enforcing strict safeguarding measures to protect all beneficiaries and holding representatives accountable for maintaining the highest ethical standards.

## IV. Key Principles

**Zero Tolerance:** D-tree will not tolerate any form of sexual exploitation or abuse. All individuals have the right to dignity, and violations of this policy will result in immediate disciplinary action, up to and including termination.

**Accountability:** All D-tree representatives are responsible for preventing and reporting sexual exploitation and abuse, ensuring a safe environment for beneficiaries and those served by the organization. Employees must uphold and enforce the zero-tolerance policy and foster a culture that prevents such misconduct. Managers have a particular responsibility to support systems and practices that maintain a safe and respectful environment.

**Protection from Retaliation:** Individuals who report sexual exploitation and abuse in good faith will be protected from retaliation.

**Confidentiality:** All reports will be handled with the highest degree of confidentiality to protect the identities of victims and witnesses.

## V. Prohibited Behaviors

The following actions are strictly prohibited under this policy:

**Exploitation of Power:** Using one's position to solicit sexual favors from beneficiaries, particularly in exchange for services, aid, or protection.

**Sexual Relationships with Beneficiaries:** Any sexual relationship between D-tree representatives and program participants/beneficiaries is prohibited. Sexual activity with persons under 18 years is also prohibited, regardless of local age of consent. Mistaken belief in the age of a child is not a defense.

**Transactional Sex:** Engaging in any form of transactional sex (e.g., exchanging money, employment, goods, or services for sex) is forbidden. This includes offering assistance intended for program participants or communities.

**Facilitating Exploitation:** Facilitating or engaging in commercial sexual exploitation or grooming vulnerable individuals for future exploitation.

**Sexual Harassment:** Any form of sexual harassment is strictly prohibited. This includes, but is not limited to, unwanted sexual advances, inappropriate physical contact, non-verbal harassment (e.g., leering, whistling, indecent gestures), sharing sexually explicit content, making sexually charged comments, and threats or demands for sexual favors in exchange for employment benefits.

**Coercion:** Pressuring someone into sexual activity after they have refused is strictly prohibited. Any attempt to persuade or coerce someone after they have said "no" constitutes a violation of this policy.

## VI. Professional and Personal Conducts

D-tree expects all representatives to act with integrity both during and outside of working hours. Actions taken outside of work or working hours that violate the principles of this policy or compromise D-tree's reputation may be subject to disciplinary review. This includes, but is not limited to, engaging in behaviors that contradict D-tree's safeguarding commitments, unethical interactions with beneficiaries or partners, and any actions that bring disrepute to the organization. Staff are required to report any situations where external conduct may pose a risk to D-tree's mission, reputation, or the safety of its community. Violations will be assessed on a case-by-case basis, and appropriate measures will be taken, including potential disciplinary action.

## VII. Reporting Mechanisms

D-tree employees must immediately report any concerns or suspicions of sexual exploitation or abuse involving D-tree representatives. The following reporting channels are available:

- Email: [ethics@d-tree.org](mailto:ethics@d-tree.org)
- Contact HR (Alasana Gasper) via email ([agasper@d-tree.org](mailto:agasper@d-tree.org)) or by scheduling a meeting.
- File an anonymous report using [this](#) form].

All reports will be promptly investigated, and perpetrators will face disciplinary actions, up to and including termination and legal referral. D-tree will also relay and escalate reports that do not involve its representatives to the relevant authorities.

## VIII. Associated Policies

This policy should be read alongside D-tree's Child Protection Policy, Sexual Harassment Policy, Code of Conduct, Ethical Conduct and Reporting/Whistleblower Policy, and Anti-Corruption Policy.

## IX. Implementation and Review

All staff and partners must undergo annual training on this policy, including recognizing signs of abuse and understanding reporting mechanisms. This policy was first created in January 2021 and last reviewed in February, 2025.

## X. Administrative:

*Original Version Approved by: Alison Clark, COO*

*Effective Date: January 1, 2021*

*Modification Approved by: Alasana Gasper, Senior HR Manager*

*Last Modified: February 5, 2025*