



CBM PSEAH- Policy

CBM's Protection from
Sexual Exploitation, Abuse
and Harassment (PSEAH)
Policy

CBM's Protection from Sexual Exploitation, Abuse and Harassment

CBM Christoffel-Blindenmission / Christian Blind Mission takes a zero-tolerance approach to sexual exploitation, abuse and harassment. The policy outlines both expectations and requirements for CBM staff and our partners to manage the risk of SEAH and SEAH incidents occurring in the delivery of our services. Protection of SEAH is a shared responsibility. We all must play an active role in addressing SEAH that occurs in course of our work - only if all parties act, will we have meaningful change.

Key users:

- Mandatory for all CBM staff and associates.
- A reference for CBM partners.

Related CBM policies:*

1. Safeguarding Policy
2. Code of Conduct
3. Programme Feedback and Complaints Policy
4. Diversity, Equity & Inclusion Policy

Languages:

This policy is originally written in English and centrally translated into French, German and Spanish.

Purpose

The purpose of this policy is that all CBM staff and partners are aware of their role and responsibilities in keeping communities, stakeholders as well as own staff safe from any form of sexual exploitation, abuse and harassment.

Scope:

The PSEAH Policy applies to:

- a. All employees of CBM, regardless of their type of contract, the scope of their responsibilities and the location of employment. No employee is exempt from the PSEAH policy. In accordance with relevant employment policies and procedures, any breach will result in disciplinary action, which could include termination of employment and prosecution
- b. (Sub) Contractors and their personnel
- c. Suppliers who are in direct contact with CBM target population because of their work
- d. People and groups volunteering in CBM projects and/or visiting programmes
- e. Partner organisations receiving material and non-material support from CBM

The above people are expected to act in accordance with the principles and reporting requirements outlined in this policy.

The policy applies during and outside working hours every day of the year.

* <https://cbm365.sharepoint.com/sites/intranet-documentlibrary>

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This policy complements the CBM Safeguarding Policy approved in January 2023 by addressing in detail the spectrum of sexual exploitation, sexual abuse and sexual harassment (SEAH).

Queries about this publication and requests for permission to use or translate (parts of) it should be addressed to email: safeguarding@cbm.org

Approved by: Executive Management.

Policy owner: Senior Global Security and Safeguarding Manager

Bensheim, April 2025

Definitions

Survivor/Victim*	A survivor/victim is a person who is or has been sexually exploited, abused or harassed.
Sexual Abuse	Is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
Sexual Exploitation	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.
Sexual Harassment**	Any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. Sexual harassment may occur in the workplace or in connection with work.

*The term “victim” has protective implications, as it implies the victim of an injustice which we should seek to redress. Therefore, this resource uses both terms. People who have experienced SEAH may choose different terms to describe their experience. Source: VICTIM/SURVIVOR-CENTRED APPROACH TO PROTECTION FROM SEXUAL EXPLOITATION, ABUSE AND HARASSMENT IN THE AID SECTOR, CHS-Alliance, 2024.

** While sexual harassment typically involves a pattern of conduct, it may also take the form of a single incident. The perspective of the person who is the target of the conduct shall be considered when assessing the reasonableness of expectations or perceptions. In cases of sexual harassment, the determining factor is not the intent of the subject of complaint but the impact on the affected individual.



PSEAH Principles

CBM has adopted the PSEAH Principles established by the Inter-Agency Standing Committee (IASC).^{*} They underpin and guide SEAH-related conduct by all people and organisations doing humanitarian, development, or peace-related work.

As such, CBM's commitment to PSEAH and the implementation of this policy are driven by its commitment to the following set of guiding principles:

1. SEAH is prohibited.
2. Zero Tolerance for Inaction: CBM has zero tolerance for acts of SEAH. CBM has zero tolerance for retaliation^{**} against victims/survivors or whistleblowers. All concerned parties are asked to do their utmost to prevent, report^{***} or respond to SEAH. It does not mean that zero cases of SEAH are being reported. Reporting is strongly encouraged and should not be penalised. For CBM, zero tolerance also means acting on every allegation fairly and reasonably with due regard to procedural fairness and survivor-centricity.
3. Tailor PSEAH approaches to the CBM safeguarding context and ensure they are inclusive and survivor-centred: CBM is committed to developing and strengthening its reporting mechanisms by updating its SEAH risk assessment where necessary and generating action plans to design PSEAH approaches. Our approach focuses on truth finding, which may also be needed to protect the subject(s) of the complaint from false accusations.
4. Embed SEAH prevention as part of CBM's working culture: CBM creates an environment where it is safe to address structural inequalities, challenge issues of power and prejudice, and promote equality for staff and project participants in all their diversities.
5. Respond appropriately to suspicions, reports, and incidents of SEAH:
 - CBM expects staff's concerns or suspicions of SEAH, whether within CBM or not, to be reported.
 - Assistance and investigation should apply a survivor-centred approach (details below)
 - Hold those found to have committed SEAH accountable and take appropriate action in line with relevant due process.
6. Respect confidentiality and protect against retaliation: CBM ensures its reporting mechanisms are safe and confidential. All those involved in an allegation are protected against retaliation, have their confidentiality and dignity respected and receive appropriate support.

^{*} Source: Inter-Agency Standing Committee <https://psea.interagencystandingcommittee.org/>

^{**} Any direct or indirect detrimental action recommended, threatened, or taken because an individual has been the victim of or reported suspicion of alleged misconduct in good faith, such as sexual exploitation, abuse or harassment, or participated in an authorized audit or investigation.

^{***} The exception here is that a survivor / victim will never be forced to report if s/he is not ready to do so.

PREVENTATIVE ACTION

CBM commits to addressing PSEAH throughout its workplace and its work using the three-pronged approach of prevention, reporting and response.

Leadership: All leaders will provide high-level oversight and accountability, promote and uphold the PSEAH principles, and serve as role models.

Organisational culture: CBM will create a culture of openness and trust that includes awareness-raising, training interventions, tools, guidance, and procedures to engage stakeholders in the attitudes, practices, and engagements required to uphold its PSEAH commitments proactively.

Safe recruitment: CBM will implement quality and rigorous recruitment and selection processes to create safe, respectful and inclusive environments for those working in and with the organisation.

Safer programming: Risk assessments and planning will be carried out on proposed project proposals to proactively reduce inherent risks of SEAH.

Partner assessment: CBM will make PSEAH mandatory for partners and require them to align with the PSEAH principles and standards set out in this policy.

Communication: All stakeholders must know what constitutes appropriate behaviour and how to identify and report inappropriate behavior using safe, confidential, and accessible reporting mechanisms. Care will be taken to ensure that communication materials are diverse, inclusive, and appropriate for the intended audience.

Training: CBM will ensure that all stakeholders receive PSEAH training and refresher courses relevant to their roles and responsibilities.



REPORTING AND RESPONSIVE ACTION

- If a CBM staff member or other stakeholder has concerns or suspicions regarding SEAH by a fellow worker, whether within CBM or not, CBM expects them to report it as soon as possible after becoming aware of it and no later than 48 hours afterwards.
- CBM will ensure that there are safe and appropriate multiple pathways to report SEAH concerns.
- CBM will work with partners to ensure they develop and establish accessible, inclusive and safe SEAH reporting mechanisms.
- Information on PSEAH will be made available in various accessible formats. This will ensure that people know what to report, how to report, whom to report to, and what actions they can expect CBM to take once an incident is reported.
- CBM does not require proof or evidence from individuals raising SEAH concerns or complaints. People can report any suspected, witnessed, or experienced complaint without fear of reprisal.
- CBM is committed to protecting the confidentiality of allegations related to SEAH to the greatest extent possible. This is essential for maintaining the investigation's integrity and preventing embarrassment, further discrimination, harassment, or retaliation.
- Any confidential or sensitive information obtained during an investigation will not be disclosed to others unless required by law. We will handle any concerns individuals may have regarding the confidentiality of their information with the utmost sensitivity, ensuring that information is not shared unless necessary. However, it is important to note that CBM cannot guarantee complete confidentiality. Conducting an effective investigation may require revealing certain information to the individuals implicated and potential witnesses.
- CBM staff must not conduct investigations independently but report.
- CBM staff, project participants, partners and community members can report, in writing or verbally, suspected or confirmed cases of SEAH through any one of these established pathways:
 1. Notify the Country Safeguarding Focal Person, Country Director or the respective Security and Safeguarding Advisor.*
 2. Contact the Global Safeguarding Advisor via email: safeguarding@cbm.org or call directly.: +491622570462
 3. Report via the anonymous whistle-blower mechanism on CBM's website**
 4. Report via the external SEAH email address: SEAH-CBM@safereporting.de, in case people prefer an external person, outside of CBM).

* <https://cbm365.sharepoint.com/sites/intranet-workatcbm/SitePages/Global-Health-and-Safety.aspx?web=1>

**<https://www.cbm.org/about-cbm/responsibility-and-transparency/reporting-channels-and-safeguarding>



Survivor-centred approach

CBM is committed to applying an end-to-end* survivor-centred approach to sexual exploitation, abuse and harassment. Therefore, our work is underpinned by a "no harm" approach and prioritizes the survivors' rights, needs, and wishes to ensure their safety, health, and well-being. Every effort will be made to protect the privacy of all complainants and the subjects of the complaint. While CBM cannot guarantee complete anonymity, information about the complaint and investigation will be limited to individuals on a need-to-know basis.

This approach will draw on the Victim/Survivor Centred Framework developed by CHS Alliance.** The framework addresses protection and responses to SEAH in the humanitarian sector. CBM will also integrate the principles of the Inter-Agency Standing Committee*** into its survivor-centred process, detailed below.

Safety, Security & Well-Being: CBM prioritizes the safety and security of survivors, considering their family, social, and cultural contexts. It is essential to assess any potential risks for survivors and to provide all contact, communication, and support in a way that respects their rights, needs, safety, dignity, and emotional well-being. This approach aims to protect survivors from stigmatization, discrimination, retaliation, and re-traumatization.

Confidentiality: CBM is strongly committed to safeguarding the confidentiality of individuals who wish – and are ready – to share their information. We respect survivors' autonomy and their right to choose when, how and with whom they share their stories. However, we believe survivors must understand the limitations of confidentiality, particularly regarding mandatory reporting procedures and their implications. Additionally, CBM clarifies that a survivor's decision to maintain confidentiality may impact on the scope and effectiveness of any potential investigation. To reinforce our commitment to privacy, we implement strong data protection measures.

Dignity & Respect: All CBM actions are guided by respect for the dignity, choices, wishes, needs, rights, culture, and values of survivors, and their informed decisions are considered a priority.

Non-Discrimination & Inclusion: At CBM, all survivors receive fair and equal treatment. CBM strictly prohibits discrimination based on race, color, sex, gender identity, sexual orientation, ethnicity, age, language, religion, belief, political or other opinions, national or social origin, disability, property, birth, or any other status.

Transparency & Information: CBM ensures that survivors receive regular and timely information in a clear and accessible language and format. This helps them understand the potential consequences of various courses of action, including the benefits and risks, enabling them to make informed choices.

* End-to-end refers to a full process from start to finish, including prevention, response and accountability measures.

** CHS Alliance – Victim/survivor-centred approach to protection from sexual exploitation, abuse and harassment in the aid sector, foundational paper, 2023, Taking a victim/survivor-centred approach to protection from sexual abuse, exploitation and harassment in the aid sector | CHS Alliance

*** IASC SEAH Victim Survivor Centered Approach and Principles, 2023, IASC Definition & Principles of a Victim/Survivor Centered Approach | IASC



Foto: CBM

Support & Assistance: CBM provides comprehensive support* and assistance to all survivors, regardless of whether they choose to initiate or participate in an investigation or any other resolution process. In line with the survivors' preferences, CBM offers accessible services including, but not limited to, medical, psychological, socio-economic, and legal support. These services should be available for as long as necessary.

Redress: CBM respects survivors' rights to seek remedies from perpetrators via appropriate formal and informal processes, including restorative justice, and as needed, supports survivors in accessing these remedies.

Support for Child Survivors: CBM offers assistance and support to child survivors (individuals under 18 years of age) by the Convention on the Rights of the Child (CRC),** in particular, the principle of the “best interests of the child”, as per article 3 of the CRC.

* CBM has designated family support officers who have received training in psychological first aid. In addition, each country office has a referrals list for safeguarding to provide immediate assistance if the person(s) involved in a complaint agree to use it. Such support will be offered early on in and throughout the process.

**Source: United Nations, Convention on the Rights of the Children,

<https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>



Foto: CBM

Policy Adaptation

While this is a global policy, where necessary, CBM Country Offices can contextualise it to fit the local legal and cultural context without diluting it. Any adaptations besides language translations can only be made in consultation with the Global Safeguarding Advisor.