



Safeguarding Against Sexual Exploitation, Abuse, and Harassment (SEAH)

Reporting and Response Policy for all Associação
NATURA Staff and Representatives

Associação Natura Moçambique

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Purpose and Scope

Associação NATURA [hereafter NATURA] is committed to working collaboratively with a range of donors and implementing partners to promote, protect and defend our living planet and to help build a world upholding the rights and dignity of all.

The purpose of this policy is to outline NATURA's safeguarding approach to preventing sexual exploitation, abuse and harassment [hereafter PSEAH]; and how NATURA will respond to allegations and incidents of SEAH.

This policy is binding for all NATURA staff, whether full-time, part-time or engaged on fixed-term contracts. All staff and representatives must familiarize themselves with this policy. This policy is also binding for other individuals working with NATURA, including (but not limited to) partners, board members, volunteers, consultants, contractors/suppliers/vendors acting in NATURA's name or on NATURA's behalf, interns, visitors (e.g., donors), dependents accompanying staff while working for NATURA, and other individuals acting as representatives of NATURA (hereafter "representatives").

This policy is binding both during working hours and when on a mission outside of normal working hours.

NATURA's Safeguarding and Preventing Sexual harassment, exploitation and abuse (PSEAH) policy is integrated into our standard contracts and partner agreements if and when they act and develop activities on behalf of Natura. Interconnected to this policy is NATURA's Codes of Conduct, and our Anti-corruption and Whistleblowing Policies.

Approved by: *Approved by Associação NATURA's Board, on 10th July, 2024*

Date for next review: *10th July, 2026*

Definitions

Safeguarding¹ refers to an organization's commitment to prevent harm to people in the delivery of our programs. Safeguarding is an organizational culture and holistic approach that includes prevention (clear policies, training), reporting, and response mechanisms instituted to protect all employees and partners, but especially the most vulnerable (women, children, disabled, discriminated against) persons among us.

NATURA adopts these definitions of SEAH outlined by the United Nations (2018)²:

- **Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. Includes profiting monetarily, 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 includes 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, regardless of the age of majority or consent locally. Mistaken belief in the age of a child is not a defence.
- **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.

¹ <https://safeguardingsupporthub.org/what-safeguarding#ftnref2>

² Intensification of efforts to prevent and eliminate all forms of violence against women and girls: sexual harassment (A/RES/73/148). UN General Assembly Resolution

Codes of Conduct, Duties

NATURA'S PSEAH policy stands alongside our Codes of Conduct and recognizes that incidents of SEAH are rooted in imbalances of power, particularly gendered and sexualized abuses of power.

NATURA will respond swiftly in accordance with both organizational policy and national law when such harms are reported and/or are determined to have occurred.

NATURA is committed to creating a safe working environment that upholds the rights and dignity of all and strives to ensure that our preventing SEAH policy continuously improves and reflects best practices and that our approach is survivor-centered³. Therefore, staff and representatives are strictly prohibited from carrying out any form of SEAH towards anyone they come into contact with through their work.

NATURA is also committed to working with complainants and survivors to ensure they are central to any response, are not further harmed or disempowered by any processes, and receive support throughout the process.

Zero Tolerance

NATURA views any form of SEAH as a gross violation of human rights and therefore maintains a **zero-tolerance policy** with its staff or other individuals working with NATURA (hereafter “representatives”)⁴.

NATURA's zero-tolerance approach to SEAH includes embracing the **Inter-Agency Standing Committee Six Core Principles Relating to Sexual Exploitation and Abuse (2019)**⁵.

³ A survivor-centered approach means placing the needs and priorities of survivors of violence at the forefront of any response.

⁴ Other individuals working with NATURA include (but are not limited to) partners' staff, NATURA volunteers (including board), consultants, contractors, interns, dependents accompanying staff while working for NATURA, and other individuals acting on behalf of NATURA.

⁵ <https://interagencystandingcommittee.org/the-inter-agency-standing-committee>

1. Sexual exploitation and abuse by a NATURA worker constitute an act of gross misconduct and is therefore grounds for termination of employment.
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. This includes exchange of assistance that is due to beneficiaries.
4. Any sexual relationship between those providing environmental services and a person benefitting from such assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of our organization.
5. Where a NATURA worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same organization or not, he or she must report such concerns.
6. NATURA employees are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of ethics and conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

As part of NATURAs zero-tolerance approach to SEAH, the following clause is included in all cooperation agreements with partners and donors:

“The parties agree to actively prevent sexual exploitation, abuse and harassment (SEAH), and to ensure, in the best possible way, that the intervention is carried out in an environment free of all kinds of exploitation, abuse and harassment, sexual or otherwise, especially in the case of vulnerable groups.”

Additionally, NATURA commits to ensuring:

- All staff are trained on recognizing SEAH, preventing SEAH, and trained on how to formally respond to SEAH incidents.
- Full investigation of all complaints, and ensuring that all allegations of SEAH are responded to in a timely, thorough, and survivor-centered manner.
- Ensuring that we embed awareness of and prevention of SEAH into every aspect of our work – from recruitment, to programme design, to implementation, including at remote field sites.
- Reflecting on all complaints and adjusting policies as needed to strengthen NATURA's prevention of SEAH and support of survivors.

NATURA also prohibits staff and representatives from engaging in sexual activity with people whom they line manage or supervise and, in the case of the most senior managers, any more junior staff. NATURA does not prohibit staff from beginning relationships with each other outside of the unequal power dynamics outlined above but all staff or representatives engaged in or beginning relationships with other staff or representatives must behave professionally and conduct their relationships in a way that does not impact NATURA's work or violate such policies.

Child Safeguarding

The following rules and procedures are mandatory to protect all children from deliberate or unintended actions that place them at risk of abuse or exploitation carried out by NATURA staff and representatives:

- NATURA strictly prohibits staff and representatives from engaging in any kind of SEAH with children (an individual 18 years or younger) as defined above. The mistaken belief of age is not considered a defence.
- NATURA strictly prohibits staff and representatives from engaging in or promoting any form of abusive, exploitative, or harmful behaviour towards children.

- All staff and representatives must protect the rights of children and ensure their rights, safety, and physical and mental wellbeing.

Prevention of SEAH towards Beneficiaries of NATURA Programs

The following rules and regulations are set up to ensure that procedures are in place to protect partners and/or beneficiaries of NATURA support, from sexual abuse or exploitation carried out by NATURA representatives. A partner/beneficiary includes any community member (child or adult) involved in our programs.

- NATURA strictly prohibits staff and representatives from engaging in any form of abusive, exploitative, or harmful behaviour with beneficiaries of NATURA support.
- NATURA strictly prohibits staff and representatives from buying sex while implementing their duties/activities for NATURA.
- All staff and other representatives have a duty to protect the beneficiaries of NATURA's work. Every aspect of our work must be carried out in a way that ensures the rights and dignity of all beneficiaries of NATURA support.

Relationships or any kind of sexual activity with community members who are not beneficiaries of NATURA support (i.e. not receiving direct assistance from NATURA or involved directly in any programming activities) are not prohibited. However, NATURA representatives together with management must ensure the relationship is not and could not be perceived to be exploitative or abusive. If it is perceived/known to be so, investigation and disciplinary actions will be pursued.

Requirements to Report SEAH

NATURA will ensure that the safety, dignity and rights of the survivor are respected at all times, and we remain committed to carrying out fair investigations that protect the rights of all involved, while ensuring confidentiality and the safety of any victim/s.

All NATURA staff and representatives are required to report if:

- Any beneficiary of NATURA support alleges that they or another person is experiencing or at risk of experiencing sexual harassment, exploitation or abuse - whether carried out by NATURA representatives or staff, or project partners, or others.
- An employee or representative suspects that someone connected to NATURA carries out sexual harassment, exploitation or abuse towards recipients of NATURA programs.
- A NATURA employee is experiencing sexual harassment, exploitation or abuse by a colleague or superior.

If a NATURA employee or representative does not report an SEAH incident they can face disciplinary proceedings. If anyone has concerns that any individual has been or is at risk of being abused, exploited, or harmed in any way they must report this immediately in line with the reporting procedures outlined below. However, NATURA recognizes the agency and independence of victims and such individuals do not have to report their own experience of SEAH if they choose not to.

Who Can Report, How to Report

Anyone can report SEAH concerns. But any NATURA employee or affiliate person/s receiving a report should try to ensure that the report is shared with NATURA's Safeguarding Focal Point within 24 hours, or as soon as safety allows.

NATURA's Safeguarding Focal Point is Augusto Júnior Nhampossa.

SEAH Focal Points are formally communicated via email at SafeguardingNATURA@gmail.com - a secure email service. After reporting to the Safeguarding Focal Point at SafeguardingNATURA@gmail.com.

Once a report is received, Safeguarding Focal Point will engage with the person reporting the situation and complete an Incident Form - see Appendix 1. Focal points are trained in response, including but not limited to BOND reporting procedures.⁶

The Safeguarding Focal Point is responsible for immediately and confidentially reporting all concerns, **anonymized if required/requested by the victim**, to the Senior Management Team within 24 hours of completion of the report, sooner if the victim's health or safety or life is at risk.

There is no time limit on when someone can raise a concern about SEAH, although there may be limitations to how a historical concern can be addressed, especially legally if required.

NATURA commits to ensuring that survivors can choose if, when, and how to make a report and decide whether they want NATURA to take formal action. There may be occasions where NATURA has a duty of care to respond even if the survivors do not want to take forward action. This will be managed on a case-by-case basis, following clear risk assessments, and the safety and well-being of the survivor will be paramount throughout.

The Senior Management Team after receiving the report/s are responsible for forming a response team, and leading investigations and disciplinary processes, including but not limited to any communications with the alleged harasser.

The Senior Management Team is also responsible for ensuring that donors and others linked institutionally to the alleged harasser are informed of SEAH concerns in line with donor/partner reporting requirements and statutory/regulatory bodies.

⁶ https://www.bond.org.uk/wp-content/uploads/2022/08/bond_safeguarding_dealing_with_reports_procedure.pdf

Responding to Concerns and Complaints

Incident Management Process

Anyone can raise a concern or complaint. An individual can raise a complaint even if they have no evidence other than their own experience, recognizing that sexual harassment, exploitation and abuse usually occur away from the public eye and therefore it can be difficult to produce evidence (e.g., a witness).

NATURA's Senior Management Team will work with survivors and complainants to understand how they would like the issue they raised to be addressed; this policy does not prejudice the right of survivors and complainants to also use external procedures (e.g., criminal justice procedures) where that is their preference to do so.

If a survivor or complainant makes a formal complaint and wants an investigation to be carried out, or if NATURA takes the view that they have a duty of care to carry out an investigation, then an investigation process will be initiated, and must follow agreed safeguarding guidelines.

NATURA will support its partners to develop measures to ensure that any investigations carried out are objective, timely, fair and built on NATURA's SEAH approach. All parties should be able to participate in the investigation without fear of retaliation.

Step 1: Complaint received (timeframe: actions taken within 1 week)

a) Within 72 hours the complaint is acknowledged, and the SEAH Focal Point/s will engage with the complainant on their concerns, inform the management and jointly form a safeguarding team to handle the case.

b) The chair of NATURA's Board will be informed that a case has been opened.

c) The safeguarding team will assess what action can be taken. If an investigation needs to be conducted, the safeguarding team will decide how and by whom this investigation will be conducted. If an investigation cannot be carried out (e.g., if survivor does not want an investigation or there is insufficient information to proceed) then the case will be closed and other actions that can be taken to address concerns will be assessed.

d) Within 1 week the safeguarding team will discuss the case, lay out the methodology, the timeline and if necessary, carry out a risk assessment to address any immediate security or welfare concerns, and possibly seek legal guidance/external support.

Step 2: Investigation (timeframe: ~4 weeks). This will vary depending on nature and complexity of case. *An investigation can include carrying out any interviews, gathering any available evidence, and producing an investigation report.*

a) The survivor should be interviewed first (or provide a written response to questions submitted by the Investigators where a verbal interview is not possible), followed by any witnesses and the complainant if not the survivor, and then the subject of complaint.

b) The Investigation Report is submitted back to the established safeguarding team.

Step 3: Decision (timeframe: actions taken within 72 hours after step 2 is completed)

a) The established safeguarding team reviews the report and together with management takes a decision on the report and its findings.

b) The SEAH focal point documents the decision (through minutes) and informs the complainant and subject of complaint.

c) The safeguarding team, and/or others as appropriate, will carry out any recommendations agreed on (e.g., disciplinary action, warning and potential termination, suspension with or without pay pending disciplinary proceedings, letter of censure in the personnel file of the person, awareness raising, policy development) with involvement from management as required.

Step 4: Outcomes shared and lessons learned (timeframe: up to 2 weeks following decision made)

a) The Board is informed of the outcome.

b) The subject of complaint and the survivor have the right to appeal against the decision, in line with this policy and its procedures. If there are concerns about the response (e.g.,

if a conflict of interest has allegedly impacted on the investigation) this must be brought to the attention of the Board chairperson. If the subject of complaint and/or the survivor have concerns about reporting or if they want to appeal against how a process has been managed, they can report directly to the SEAH Focal Point, who must then include external expertise to carry out step 2 and 3.

c) Within 8 weeks: A meeting is convened so that the SEAH Focal Point and the safeguarding team can discuss learning from the case. Feedback must be sought from the survivor and complainant and incorporated into the lessons learnt conversation. Lessons learnt must be shared as appropriate, removing identifiable information, with the board to ensure key learning is shared and improvements made to practice.

NATURA will make a decision on a case-by-case basis about how allegations of harassment, abuse or exploitation will be addressed, but allegations relating to child exploitation or abuse will always be addressed by external experts. NATURA will refer cases to appropriate professionals and organizations that act in line with NATURA's values and puts the welfare of the child or adult at-risk as the highest priority.

Preventing Retaliation Against Complainants, Survivors and Witnesses

NATURA will take serious action against any staff or other representatives who seek to or carry out retaliation (e.g., intimidation, bullying, threatening behaviour) against complainants, survivors, witnesses or any others involved or believed to be involved in an incident management process. Staff who are found to have done this will be subject to disciplinary action.

False or malicious complaints: If a NATURA representative is found to have made a false allegation, they will be subject to disciplinary action.

It is important to note that if a case is not upheld that does not mean the complaint was false, rather that there was insufficient evidence to uphold the allegation.

Confidentiality

Confidentiality is critical and we are committed to working with survivors/complainants and others involved in an incident management process in a confidential and respectful manner. Information might need to be shared on a 'Need to Know' basis – that is, only those who need to be informed so they can support an investigation or because they hold overall responsibility will be given information, and they will receive only as much information as they need in order to be effective.

If information is shared confidentially which relates to criminal actions, a child or suggests that someone's life is in danger, then action will need to be taken outside of standard confidentiality procedures in order to ensure that everyone is safe. This will be managed on a case-by-case basis, and the safety and wellbeing of the child or adult at-risk in question is always paramount.

NATURA will ensure that it complies with local and international data protection laws when gathering, storing, or sharing any data relating to individuals involved in SEAH incidents.

APPENDIX I: Safeguarding Incident Reporting Form

This form is the standardized form used by the Resource & Support HUB and UK Development Agency and may be used to report concerns related to:

- Breach of this PSEAH Policy
- Breach of Code of Ethics and Conduct
- Breach of Gender Equality and Social Inclusion Policy
- Breach of other relevant policies or laws.

NOTE: This report is confidential and must not be given or the contents disclosed to any other/unauthorized person. This report will be completed by NATURA's Safeguarding Focal Point, who will then formally submit the report to NATURA's Directors.

Safeguarding incident reporting form	
To be filled by the complainant or safeguarding focal person either with or without the complainant	
Details of the person completing the form (leave blank if you prefer to stay anonymous)	
Name:	
Organisation's name:	
Designation:	
Relationship to the survivor:	
Details of the survivor of safeguarding concern (child/vulnerable adult)	
This information will only be shared on a need-to-know basis.	
Name:	
Age:	
Gender:	

Address:	
Phone number:	
Language spoken:	
In the case of a child, whom does the child live with? (e.g., household structure/ caretaker)	
In your opinion, would it be safe to contact the survivor?	
Any other information:	
About the safeguarding concern	
Date, time and place of the incidents(s):	
Details of concern/suspicion/incident	
<p>When receiving a report from a survivor remember these key points: do not be judgemental and assure the person that it is ok to tell. Click here to read more about how to receive a report and the Dos and Don'ts.</p> <p>How did you come to know about the incident? How did you come to have a concern: was abuse observed or suspected? Was an allegation made?</p>	

Details of what happened, including time, dates, location, and names of others involved. Note behaviour, emotional state, or physical signs you may observe and details of the alleged perpetrator.

Note: Continue on a separate sheet if required.

Have you contacted anyone already about this concern (e.g., family member, parents, caretaker, line manager, co-worker, safeguarding focal person or agencies, etc.)?

If yes, then please provide details such as time, date of reporting and person to whom the report was made.

Advice given by that person (if any):

Any action you may have taken so far (e.g., emergency medical or any other immediate support provided such as safety measures, or psychological support)?

If so, what, when and by whom?

Current state/safety concerns of the survivor

Include any immediate safety concerns (e.g., access of the alleged perpetrator to the individual, whether they are displaying behaviour that is a cause for concern).

Undertaking: I can confirm that to the best of my knowledge, the information provided above is correct and that I will be available to answer any further questions on this matter.

Signed:	
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Date:	
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Note: Please fill out as much information as possible and submit it to the safeguarding focal person immediately. Please remember that all information contained in this report must be kept confidential and must not be revealed to anyone except the person you reported to.