

# Developing PSEA Human Resources Policies and Measures

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## Audience



PSEA/safeguarding/  
protection  
focal points



Administration  
staff



Senior  
managers

# Tool 1 Recruitment, onboarding and staff training

The purpose of this document is to support CRS partners in developing human resources processes that are responsive to protection from sexual exploitation and abuse (PSEA). Part I provides basic guidelines on incorporating PSEA measures into the HR processes, especially focusing on recruitment and the vetting of hired staff and volunteers. Part II provides recommendations on staff onboarding and training relevant to PSEA. All recommended measures are based on international PSEA standards.

## I. STAFF RECRUITMENT AND VETTING

Human resources staff or hiring management should ensure that all new and potential hires understand the organizational commitment to protection from sexual exploitation and abuse, and the expectations of them as potential staff members. This means defining organizational protocols, mechanisms and tools for the recruitment process. These should ensure that candidates have not engaged in activities that are not aligned with the organization's commitment to PSEA. The term "staff" in this document refers to employees, volunteers, consultants and interns.

### Include PSEA commitments in job advertisement

Inform the candidate of the organization's vision and mission, as well as its culture, values and principles that prevent sexual exploitation and abuse by its employees. This can be done in the job description or on a recruitment page or application form. For online applications, this should be reiterated, and candidates invited to reflect on their personal values and how those align with the organization's, demonstrating a value-based motivation for the job they are pursuing.

- Sample statement: *"The organization requires its staff to treat all people with dignity and respect, and actively prevent harassment, abuse, exploitation and human trafficking everywhere and at all times."*
- The value statement can highlight key values such as honesty, integrity, courage, respect, diversity, commitment, stewardship and accountability.
- Include specific statements that focus on the candidate's motivation for the job, such as: *"We are looking for people who are values led and results driven."*
- Basic humanitarian principles upheld by the organization can include neutrality, impartiality, humanity and independence.
- The job advertisement should emphasize the organization's need to employ staff with certain key values.
- Include a summary of the key duties, essential qualifications and most interesting aspects of the job.
- Describe the organizational culture and work environment, and list any benefits and growth opportunities.
- Be strategic and advertise in the best places to reach the appropriate audience for the position.



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## Include PSEA elements in job descriptions

A job description provides an overview of the position, including responsibilities, qualifications and competencies required. Review the job description with the hiring manager and PSEA focal point to confirm the level of direct interaction with vulnerable populations.

- Job descriptions should include clauses outlining the conduct expected of staff, and refer to the organization's PSEA policy.
- The higher the level of expected interaction with vulnerable populations, the greater the potential risk to those populations, and therefore the greater the need for vetting and due diligence. In the job advertisement, include adequate clauses on performing those processes.
- For positions involving direct work with children, require candidates to sign a statement declaring they have no criminal convictions related to the abuse and/or exploitation of children. This should not be a substitute for running independent police and reference checks on a candidate (where possible).
- Include specific competencies and talents, such as accurate and active listening, integrity, accountability, building relationships, commitment to the job, consistency, reliability, emotional control, freedom from prejudice, and handling stress.

## Check gaps in employment history during interview

Seek more information on any gaps in a candidate's employment history by asking:

- How did you spend time between jobs?
- Did you do any volunteer or community work? Ask for references (names and contacts) from these engagements.

## Ask questions related to PSEA during the interview and written tests

Provide hiring managers with sample questions or scenarios that are based on the organization's PSEA policy, and code of conduct and ethics, including vision, mission and values.

- During the interview process, discuss the policies on staff-program participant relations and assess the interviewee's responses to questions related to sexual relations with program participants and vulnerability.
- Include the PSEA focal point in the interview process.
- Ask:
  - *Ask the candidate to describe previous work situations in which their morals and integrity have played a significant role in the outcome.*
  - *Ask specific questions about their peers' view of their performance in previous positions.*
  - *At the end of the interview, ask for contact details of peers mentioned in the interview in order to contact them and ask questions about the candidate.*



*Seek more information on any gaps in a candidate's employment history*

## Target gender-balanced recruitment

To facilitate the reporting of sensitive issues, diversify staff composition by gender, especially when jobs will entail working directly with women and children.



- Review job qualifications with the hiring manager to ensure there are no limitations of the candidate pool; for example, in a certain context, women may have less formal education (due to limited access) than men, but may have substantial work and community experience that could also result in the knowledge and skills needed for the position.



- Ensure your job advertising and posting strategy is not limited to online platforms that could exclude certain applicants.
- In the job advertisement, include information that could help attract a wider pool of female candidates, including details of the organization's relevant policies and benefits, such as maternity leave, support for exclusive breastfeeding, the availability of childcare at the office, and flexible working hours.



**Monitor and strive for gender balance at all levels of staff responsibility, in both main and sub-offices, and among contracted staff and volunteers.**



- When sourcing candidates, be sure to seek recommendations from male and female staff on diverse candidates they believe are experts in the field and who can be recruited for current or future openings.



- When determining who should be on the hiring committee and interview panel, remind hiring managers to select staff from a diverse range (ages and ethnicities) of male and female staff to ensure inclusive input.

- Ensure that thorough internal audits of salaries are conducted so that men and women are paid the same salary for the same work.



- Properly emphasize non-technical competencies to help enable a wider, more diverse pool to be considered.



- Do not ask female candidates if they plan to have children and then, if they respond in the affirmative, tell them they will not be a good fit because they won't be able to travel enough for the role.



- Given that some female candidates may not have as much paid work experience as male candidates, some flexibility in the referencing process is suggested, including allowing non-work references, such as from a teacher or a community leader.



## Perform background checks and references

Request at least two references from previous employers. *Note: CRS' standard is three references.* The HR manager and the hiring manager should discuss who to contact for references based on the position's requirements and employment history shared. References could be sought from the candidate's supervisors and peers. References provided by candidates should not be the only ones used. Additional references can be sought on personal and moral integrity and, in the case of faith-based organizations, are usually from religious leaders in the community. Develop a reference checklist and include safeguarding/PSEA questions. Check the reference over the phone or by video chat (Skype, Zoom) but not email. It is vital to verify who is completing the reference, and hear the tone and sincerity of their responses.

- Ensure references are rigorously gathered and follow a specific format/checklist. They should include questions about safeguarding and disciplinary action.
- If the information collected in the reference raises any concerns, these must be communicated very clearly with the hiring staff and management, and recorded in writing.
- Example questions for referee:
  - *What was the nature of the candidate's previous job?*
  - *How do you rate their performance overall? Poor, satisfactory, good or excellent?*
  - *How did the candidate interact with others?*
  - *Why did the candidate leave the job?*
  - *Do you have any concerns about the candidate working with at-risk populations and/or is there anything that might be of concern to our organization?*
  - *Are you aware of the candidate having a criminal record or any issues related to child protection that our organization should be aware of?*
  - *At any stage in their employment, did you undertake any disciplinary actions against the candidate related to any safeguarding issues?*
- Request written consent from the successful candidate to conduct a background/criminal record check. Include a declaration statement on the candidate's confirmation of true information provided as well as consequences of any misstatements, omission or falsification related to the background check process. Consequences should include disqualification from the selection process or termination of contract if already hired.
- Conduct background checks on the successful candidate (international and national), including a criminal record check in their home country and in other countries they have worked, wherever possible.
- If any concerns are flagged in the reference, request further information from the candidate.
- A thorough reference check procedure *should not be waived under any circumstances*, even in a first-phase humanitarian response. Experience has shown that not undertaking a thorough process can result in more time taken to dismiss and replace unsuitable candidates. At worst, it can result in affected populations being exposed to risk.



**Conduct background checks on the successful candidate (international and national), including a criminal record check in their home country and in other countries they have worked, wherever possible**

## All staff contracts include PSEA elements and organization's code of conduct

- All staff contracts include a statement of understanding of and adherence to the organization's code of conduct.
- All staff contracts include copies of the [IASC Six Core Principles Relating to Sexual Exploitation and Abuse, 2019](#).
- The code of conduct includes the same principles at a minimum.
- All staff contracts include organizational values, mission and vision.
- All signed documents are kept on personnel files.

## II. PSEA MEASURES IN STAFF ONBOARDING AND TRAINING

All new staff receive a briefing on PSEA policy.<sup>1</sup>

Staff are rigorously taken through the code of conduct and the sexual exploitation and abuse (SEA) complaints and investigations mechanisms. Staff are given the time to discuss and fully understand the relevant PSEA policies and procedures including consequences of code of conduct breaches.

The agency distributes the code of conduct, in English or translated, to all staff.

Basic PSEA training forms part of the onboarding process to ensure all staff know about the prevention and response measures to SEA issues. Set up and administer a system that checks staff and volunteer understanding of safeguarding training content (e.g. post-training test). Ensure safeguarding is considered in performance reviews, including probation.

Staff who have direct contact with program participants receive full PSEA training including on the causes and consequences of gender-based violence (GBV) and SEA. Staff who work directly with children also receive child protection training.

Staff working on feedback and response mechanisms (either inter-agency or project-based) and are receiving sensitive feedback, receive additional PSEA training on internal reporting system training as an obligatory part of onboarding.

Staff with prolonged and largely unsupervised time working with women and children are especially targeted for PSEA support, advice and training.

All staff receive annual refresher training on the code of conduct and PSEA, and the implications of breaching these standards, and learn about the mechanism to file complaints and reports of misconduct.

The code of conduct (either the simplified or complete version with IASC standards at a minimum) is displayed in all operational and office areas.

Managers and senior leadership have a particular role and responsibility to ensure that a training strategy is implemented to raise awareness among all staff on gender mainstreaming, GBV, human rights, SEA prevention and response, and the code of conduct, as well as how to report alleged incidences.

PSEA policy and reporting mechanism information (SEA reporting forms)<sup>2</sup> are available in the field for staff reference. PSEA materials encouraging staff to report SEA misconduct are displayed in agency premises at all locations.

During the annual staff retreat, staff have the opportunity to discuss organizational and personal values, and how those influence their motivation.

Continuously review, identify gaps, and strengthen recruitment processes with regard to safeguarding.

1. Example policy: [Policy on Protection from Sexual Exploitation and Abuse and Child Protection](#), CARE International.

2. SEA [model complaints referral form](#), PSEA Task Force.

## Tool 2 Code of conduct and ethics development plan

This section aims to assist CRS partner organizations to develop or review their codes of conduct.<sup>3</sup> It stipulates primary and recommended actions that contribute to the development of a comprehensive code of conduct and ethics, based on international standards, and principles of PSEA. A code of conduct serves two primary purposes: it protects the people that the organization serves, and protects the reputation of the organization and its staff.

■ Primary actions   ■ Recommended actions

	Actions	Y/N
1	Ensure senior leadership is committed to continual support in the code of conduct development process. Senior leadership should initiate, lead and foster widespread consultations among staff, volunteers and partners, to ensure the code is responsive to the organization's operational context.	
2	Through a consultative process, define the scope and application of the code, in line with the organizational values, vision and mission. Define which staff the code applies to and under which circumstances (e.g., while on duty, off duty, etc.). If any staff are excluded from the application of the code, define that as well as whether any operational context requires different/additional standards of the code.	
3	Consult and identify other forms of prohibited conduct beyond all forms of exploitation and abuse (such as harassment, alcohol and substance abuse, carrying weapons, etc.)	
4	Consult and identify expected attitudes and behavior of staff, such as cultural sensitivity, that are in line with organization's values, vision, mission and principles.	
5	Consult human resources standards and national laws related to different disciplinary actions that should be in place should the code be breached, up to and including dismissal.	
6	Define and develop policies and procedures in support of the reporting requirements for code breaches to be used by both staff and program participants (e.g. whistleblower policy, <sup>4</sup> internal reporting, feedback and complaints procedures, human resources manual).	
7	Clearly define terminology and use it consistently, when referring to types of behavior that are not permitted or could be breaches of the code.	
8	Consult and define in writing, within the internal reporting procedure document, the investigation process related to sexual exploitation and abuse, and explain when investigations will be undertaken.	
9	Define and refer to the organization's confidentiality policy <sup>5</sup> addressing sharing of internal information with persons and entities outside of the organization.	

3. Example [Code of Conduct](#) (International Committee of the Red Cross).

4. Example whistleblower policy: [Sample Whistleblower Protection Policy](#) (National Council of Nonprofits).

5. Example confidentiality policy: [Sample Confidentiality Agreements for Information about Clients](#) (National Council of Nonprofits).



10	Define the application and inclusion of the code to all contracts and agreements or other documents related to contractual relationships that the organization might enter into, as well as internal documents (e.g. new and existing employment contracts, service contracts, job descriptions, terms of reference and performance appraisal systems).	
11	Decide and define who within the organization is responsible for ensuring that the code is implemented, monitored and evaluated. Any such decision should clearly define the primary responsibility of managers to ensure staff are informed, receive and understand the code by means of training, and regular staff updates on code changes, as well as staff awareness-raising and staff performance pertaining to the provisions of the code.	
12	<p>Before finalizing the code, consult with a legal expert to ensure that:</p> <ul style="list-style-type: none"> <li>■ The code is in line with the national labor laws of your organization's registration country</li> <li>■ The code is consistent</li> <li>■ Staff can legally be held to account if they breach the code</li> </ul> <p>Global networks' member organizations should consult their respective structures in aligning the code to the joint standards (e.g. Caritas Internationalis<sup>6</sup>).</p>	
13	Plan for a regular review of the code (e.g. every two years), to ensure that the agency code matches the work context, and that any updates from the aid sector on the standards of behavior (e.g. updated IASC Six Core Principles Relating to Sexual Exploitation and Abuse) are made. All code of conduct updates must be promptly disseminated throughout the organization.	
14	Develop and implement a strategy for the dissemination of, and training activities on, the code of conduct for all current and future staff, at all levels.	

6. [Code of Ethics & Code of Conduct for Staff](#) (Caritas Internationalis).



# Tool 3 Code of conduct checklist

## Minimum Code of Conduct and Ethics content checklist

### ■ Define the scope and purpose of the code of conduct.<sup>1</sup>

- This Code of Conduct (the “Code”) applies to all staff. For the purposes of the Code, anyone who works for the organization under an employment contract or on another basis (such as internship, a consultancy contract or as a volunteer) is considered a staff member.
- The Code is applicable at all times. Breaches of the Code of Conduct are grounds for disciplinary action, up to and including dismissal.
- The Code is developed in line with international and UN standards, while also recognizing the importance of local laws and cultures. Staff are expected to uphold local law wherever they operate, except where the Code of Conduct is more stringent, in which case the Code applies.

### ■ Include existing professional ethical codes or statements.

- Staff conduct must be characterized by integrity, respect and loyalty to the organization’s interests and must not in any way harm or compromise its reputation.
- Staff must show due respect, particularly through their conduct, dress and language, for the religious beliefs, usages and customs, rules, practices and habits of the people of the country or context they are in and of their place of work.
- The rules set in the Code are intended to promote safety, to ensure respect for the people with whom the organization comes into contact, to protect staff members and to project a positive image of the organization, so as to guarantee the effectiveness and integrity of its work.

### ■ Include the IASC Six Core Principles Relating to Sexual Exploitation and Abuse.

- Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
- 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 defense.
- Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior, is prohibited. This includes exchange of assistance that is due to beneficiaries.
- Any sexual relationship between those providing humanitarian assistance and protection and a person benefiting from such humanitarian assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.
- Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
- Humanitarian agencies are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

### ■ Include specific PSEA-related rules for staff behavior.

- The purchase of sexual services and the practice of sexual exploitation are prohibited. Sexual exploitation is understood as abuse of authority, trust or a situation of vulnerability for sexual ends in exchange for money, work, goods or services.
- Entering into a sexual relationship with a child (a girl or boy under 18 years of age) or inciting or forcing a child to take part in activities of a sexual nature, whether or not he or she is aware of the act committed and irrespective of consent, is prohibited. This prohibition also covers pornographic activities (photos, videos, games, etc.) that do not involve sexual contact with the child, as well as acquiring, storing or circulating documents of a pedophilic nature, irrespective of the medium used.

1. See example [Code of Conduct](#) (International Committee of the Red Cross 2018)

- Staff are obliged by the Code to report concerns, suspicions and/or incidents of abuse, exploitation or breaches of this Code – irrespective of when it happened.
- Include other PSEA-relevant rules.**
  - Staff are prohibited from using IT equipment, software or email and social media platforms to engage in activity that is illegal under local or international law or that encourages conduct that would constitute a criminal offence. This includes any material that intimidates or harasses any group based on protected characteristics, or encourages extremism.
  - Staff are prohibited from taking photographs, filming or making audio recordings in the course of their duties, irrespective of the medium used, unless their work so requires, or they obtain approval from the organization.
  - Staff are prohibited from using IT equipment to view, download, create, distribute or save in any format inappropriate or abusive material including but not limited to pornography or depictions of child abuse.
- Include information about reporting complaints.**
  - Staff are obligated to bring to the attention of the relevant manager any potential incident, abuse or concern that they witness, are made aware of, or suspect which appears to breach the standards contained in this Code. Staff reporting concerns are protected by the Disclosure of Malpractice in the Workplace policy.
  - Staff who have a complaint or concern relating to breach of the Code should report it immediately to their line manager. If the staff member does not feel comfortable reporting to their line manager, they may report to a senior manager or a member of the HR team.
  - Staff receiving reports or concerns are obliged to action or refer the report immediately as per the organization’s Complaints Policy and procedures.
  - Complaints reporting email: sample@xxxx.org
  - Online confidential reporting platform link: http://xxxxx
  - Staff can also make a complaint in person, by letter or by phone to one of the people listed: line manager, HR manager or finance and administration manager, executive director.
- Include statements of receipt and acknowledgment.**
  - In accepting my appointment, I undertake to discharge my duties and to regulate my conduct in accordance with the requirements of this Code.
  - Signature line with date and location.

An extended version of this checklist is available on [EFOM](#).

Other HR resources

- HO 4.3 CAFOD Safe recruitment policy
- HO 4.4 CAFOD Safeguarding in interviews
- HO 4.5 CAFOD Conducting police checks
- HO 4.6 CAFOD Requesting references
- [HO 4.7 Safeguarding in job descriptions](#)

