



## Sexual exploitation and abuse policy

September 2025

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Type of document:	Policy document
Version:	1.1
Validation:	Audit Committee, 17/9/2025

# 1 Introductory provisions

## 1.1 Background

Enabel's mission is to promote sustainable development by means of development cooperation interventions.

Because of the international context in which Enabel operates often inherently unequal power and authority relations exist between Enabel staff on the one hand and the beneficiaries of projects and local populations on the other hand. There is a genuine risk that such unequal relation consciously or unconsciously leads to sexual exploitation or abuse by staff members of Enabel.

In June 2018, all Belgian development cooperation sector actors, including Enabel, signed an Integrity Charter. Through the Charter they endorse integrity and respect as fundamental values that lead their actions and they undertake to develop a policy to apply these values in their organisation.

These fundamental values underlie Enabel's Code of Conduct. This Code particularly imposes the following obligations in view of preventing sexual exploitation and abuse:

- Respect for the individual:  
Consequently, we develop an attitude that respects every individual whether he or she is a staff member of our organisation or not. With Enabel's mission in mind, special attention is paid to respecting local populations and partners.
- Exploitation:  
We abstain from accepting or soliciting sexual relations, including any sexual favour or any other form of humiliating sexual behaviour, degrading or exploiting others, in exchange for money, employment, goods or services.

The risk of sexual exploitation or abuse by Enabel staff also constitutes a threat to the reputation and the trust that Enabel enjoys with donors, partner countries and stakeholders.

## 1.2 Purpose

This "Sexual exploitation and abuse policy" aims to protect vulnerable beneficiaries and the local population in general against acts of sexual exploitation and abuse committed by Enabel staff.

This policy particularly aims to:

- Clearly describe what sexual exploitation and abuse is and what Enabel stance is in this matter;
- Explain the measures to prevent sexual exploitation and abuse;
- Clearly indicate how complaints regarding sexual exploitation and abuse can be filed;
- Describe the complaint management and sanction procedure.

Even though women and children are particularly vulnerable to sexual exploitation and abuse, this matter regards all beneficiaries and the whole of the local population.

### 1.3 Approval

This policy was approved by the Board of Directors on 19/6/2019.

The policy will be regularly assessed and the results thereof will be communicated to the Board of Directors.

## 2 Scope

This policy applies to all staff members of Enabel, in Belgium and abroad, within and outside working hours, and it pertains to all acts of sexual exploitation and abuse.

For this policy, staff members are understood to be:

- People under and employment contract with Enabel
- The members of the Management Committee
- The members of the Board of Directors
- Consultants who carry out an assignment abroad on the account of Enabel

Unsolicited sexual behaviour at work, as referred to in the Belgian “Law on the protection against violence, bullying or unsolicited sexual behaviour at work” remains outside the scope of this policy. For such matters reference is made to the provision in the respective Work rules and specific local legislation.

## 3 Definitions<sup>1</sup>

### 3.1 Sexual exploitation

Sexual exploitation is any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, threatening or profiting monetarily, socially or politically from the sexual exploitation of another. The term sexual exploitation represents a wide spectrum of behaviours and is not limited to the act of sexual intercourse.

### 3.2 Sexual abuse

The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This would include forced marriage and sexual slavery and also includes sexual activity with persons under the age of consent.

### 3.3 Coercion

Force can be physical, e.g. acts or threats of physical aggression, such as rape, or psychological, e.g. blackmailing, such as threats to harm someone’s reputation or to refuse access to results of a project.

Force also concerns situations when a person is under the influence of drugs or alcohol and is consequently incapable of giving consent.

### 3.4 Age of consent

The age of consent is the age on which a youth, according to the legislator, is sufficiently mature to consent with sexual acts.

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<sup>1</sup> Cf. definitions in “WHO Sexual Exploitation and Abuse Prevention and Response - Policy and procedures” (March 2017) and “One OXFAM Policy on Protection from Sexual Exploitation and Abuse (PSEA)” (December 2018)

Sexual activity with a youth under the age of consent is considered sexual abuse regardless whether the youth did not express disagreement or took the initiative.

### 3.5 Partner organisation

An organisation contracted by Enabel for implementing a project or part(s) of a project.

### 3.6 Victim

The person who is, or has been, sexually exploited or abused.

## 4 Basic principles

1. All Enabel staff members have the duty to behave in an irreproachable manner towards the beneficiaries of the projects and towards the local population in general. They must abstain from any acts that could be considered a form of sexual exploitation or abuse.

The following sexual activities are prohibited in particular:

- 1.1. Sexual activity with persons under the age of consent.  
For Enabel, in accordance with international standards<sup>2</sup>, the age of consent is 18, regardless of the local age of consent. However, where the age of consent is locally higher, the local regulation applies.  
Ignorance or mistaken belief regarding the age of the person concerned is not a defence.
- 1.2. The acceptance or arranging of sexual acts by staff members of Enabel in exchange for advantages that are linked to the activities of Enabel, or insinuating that such advantages would depend thereof.  
It regards, for instance, advantages, such as:
  - Employment with Enabel or a project;
  - Access to project results;
  - Access to public procurement or grants, or obtaining/being awarded a procurement contract or a grant;
  - ...

The fact whether the staff member can influence a decision in the matter or not is not relevant.

2. Enabel undertakes to take preventive measures to prevent sexual exploitation and abuse by its staff to the extent possible by means of communication and raising awareness on the matter. Enabel staff members are informed about the principles and guidelines laid down in this policy document by means of regular information campaigns and training.  
Enabel will also provide for points of contact whom staff members can confidentially address questions to about these matters.
3. Enabel undertakes to support and protect against retaliation any staff member who reports acts of sexual exploitation and abuse in good faith.
4. Enabel undertakes to take the necessary measures ensuring the protection of victims of sexual exploitation and abuse by staff of Enabel or of partner organisations. This

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<sup>2</sup> World Health Organization – Sexual Exploitation and Abuse Prevention and Response – Policy and procedures March 2017, p.6

means, among other things, that their claims and reports will be processed strictly confidentially and that their identity is protected.

5. Proven acts of sexual exploitation and abuse are considered serious misconduct which is reason for sanction, dismissal for good cause as appropriate and possible prosecution.
6. The general public and the local population are informed about the principles of this policy by means of adapted information campaigns and channels.  
External partners are informed about this sexual exploitation and abuse policy's existence and principles.

## 5 Specific guidelines for international staff

For this policy international staff of Enabel are:

- Staff members with an Expat contract during their stay in their country of assignment, or during an assignment in another country;
- Staff members with a Belgian contract, the members of the Management Committee, the members of the Board of Directors and consultants during a mission for Enabel abroad.

These staff members have special visibility and their behaviour consequently has a strong impact on the credibility and reputation of Enabel.

In order to prevent any semblance of sexual exploitation and abuse, Enabel explicitly prohibits the acceptance of sexual favours or the negotiation thereof in exchange for money, employment, goods or services by staff members.

This regards both one-off transactional sexual acts (prostitution) and longer sexual relations that are exclusively started or continued in exchange for money, favours or gifts that exceed the value of normal expressions of affection between lovers.

Because of the context in which Enabel operates, the extent of the differential power in such relations jeopardizes the credibility and integrity of Enabel projects.

## 6 Roles and responsibilities

### 6.1 Coordinator Sexual Exploitation and Abuse

Enabel's Management Committee appoints a Coordinator Sexual Exploitation and Abuse (Coordinator SEA<sup>3</sup>) who is responsible for implementing this policy.

The Coordinator SEA draws up an action plan and has it approved by the Management Committee.

The Coordinator SEA ensures:

- The organisation of training and annual awareness-raising for head office staff about sexual exploitation and abuse by staff members;
- The organisation of a network of Focal Points Sexual Exploitation and Abuse, the sharing of best practices and the elaboration of a training programme for Focal Points;

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<sup>3</sup> SEA: Sexual Exploitation and Abuse

- The coordination of global and local preventive measures such as training, communication and awareness-raising on the matter.

## **6.2 Focal Point Sexual Exploitation and Abuse**

In every Representation of Enabel one or more Focal Points Sexual Exploitation and Abuse (Focal Point SEA) are designated by the Resident Representative, in consultation with the Coordinator SEA.

Preferably one Focal Point SEA of each sex is designated. Where no Focal Point SEA is designated, the local HR representative takes on this role.

The Focal Points SEA are responsible for local awareness-raising and training on the matter. They draw up an action plan in this matter in consultation with the Coordinator SEA and have it approved by the Resident Representative. This action plan includes at least one awareness-raising campaign per year.

The Focal Points SEA join the Focal Points SEA network.

For staff members, the local population and third parties, the Focal Points SEA are the first contact points in the fight against sexual exploitation and abuse and for questions on this matter.

The Focal Points SEA can receive notifications of suspected or actual acts of sexual exploitation and abuse. They will work in close collaboration with the Integrity desk when processing these notifications.

The Resident Representative ensures, in consultation with the Coordinator SEA, that these duties are included in the objectives of the Focal Points SEA, that they can liberate enough time for the purpose and that they can attend necessary training.

## **6.3 Supervisors**

All line managers are expected to create a culture which prevents sexual exploitation and abuse and they have to behave in an irreproachable manner in this respect.

This means that line managers:

- Behave in an exemplary manner by abstaining in their personal and professional relations of any behaviour that could be perceived as sexual exploitation or abuse;
- Are open to discussing issues pertaining to sexual exploitation and abuse and consistently apply this policy;
- Immediately forward to the Integrity desk the notifications of sexual exploitation and abuse that they receive;
- Offer the necessary support for training and awareness-raising campaigns which aim to clearly and repeatedly communicate the content of this policy to employees.

## **6.4 Integrity desk**

The Integrity desk is responsible for investigating and managing notifications of sexual exploitation or abuse in possible conjunction with a Focal Point SEA, the Human Resources and/or external services.

The Integrity desk role is taken up by Enabel's internal audit activity.



## 7 Notification & management of notifications

### 7.1 Notification

Each suspected case or indication of sexual exploitation and abuse can be reported to a Focal Point SEA or directly to the Integrity desk.

Staff members who want to notify bullying or unsolicited sexual behaviour at work can use the existing legal channels as provided in their respective Work Rules or local legislation (confidential counsellor, prevention advisor).

#### 7.1.1 Notification to a Focal Point SEA

A victim of sexual exploitation and abuse or a staff member or external party, who, on the basis of serious indications, suspects or knows that such acts have been perpetrated by staff members, can notify a Focal Point SEA thereof. The Focal Point SEA immediately informs the Integrity desk in view of jointly deciding appropriate follow-up of the notification

#### 7.1.2 Notification to the Integrity desk

Every staff member of Enabel has the right to immediately report a suspected instance of sexual exploitation or abuse directly to the Integrity desk.

The internal reporting channel is also there for suppliers or partners of Enabel or for beneficiaries of the activities of Enabel to report fraud-related facts, express doubts or raise questions.

An integrity breach can be reported in the following way:

- via the dedicated internal reporting channel, [www.enabel.grantthornton-whistle.com](http://www.enabel.grantthornton-whistle.com), where you can also leave a voice message
- by e-mail to [integrity@enabel.be](mailto:integrity@enabel.be)
- via the Fraud focal points for the Enabel Country office in your country: <https://enabelbe.sharepoint.com/sites/IntranetAbout/SitePages/Focal-point-Contact-list.aspx>
- in person or online by requesting an interview via e-mail to [integrity@enabel.be](mailto:integrity@enabel.be) or by visiting the Internal Audit office in Brussels
- by post addressed to  
Enabel – Integrity desk  
Rue Haute 147  
1000 Brussels  
Belgium

Anonymous reports are accepted.

#### 7.1.3 Whistleblower protection

In case of direct notification to the Integrity desk, the whistleblower protection goes into force. This implies that necessary measures are taken to protect the employee in question.

- Complaints and questions are treated in the strictest confidence. In other words, the identity of the person who made the report is kept secret.
  - o However, Enabel may sometimes be obliged to reveal the identity of the employee concerned when required by law, more specifically following a judicial or administrative decision.

- Also, it may occur that because of the nature of the information that is available to the whistleblower or for reasons beyond the Integrity desk's control, it becomes known within the organisation who the whistleblower is.
- Enabel follows a strict policy in taking no direct or indirect retaliatory measures whatsoever against a whistleblower who reports a malfunction in good faith, nor against the facilitators or Fraud focal points who helped to make the report.

The whistleblower is notified about these protection measures.

## **7.2 Management of Notifications**

### **7.2.1 Investigation**

The Integrity desk assesses the admissibility of the notification and will thoroughly investigate the reported incidents. It can, where needed, rely on internal or external services to do so.

### **7.2.2 Confidentiality**

The investigation into complaints of sexual exploitation or abuse and the reporting thereof are strictly confidential. This means that access to information containing data regarding the identity of people concerned (informant, victim, alleged offender) is limited to strictly required staff members and that such information may not be further shared without the explicit consent of the people concerned. However, Enabel may be forced to disclose the identity of persons concerned when the law requires so, in particular pursuant to a court decision.

### **7.2.3 Reporting**

Whilst privacy rules are respected, the results of the investigation are reported to the Management Committee.

## **7.3 Crisis committee**

The Integrity desk escalates important sexual exploitation or abuse incidents, which may threaten the reputation of Enabel, without delay to the Crisis committee of Enabel<sup>4</sup> so necessary measures can be taken in due time to manage the incident. It particularly regards incidents with a potential significant negative impact on the reputation of Enabel.

## **7.4 Communication with the media**

Questions from the media about sexual exploitation or abuse at Enabel's are always forwarded to the Communication service in Brussels or to the Resident Representative to be dealt with in accordance with the communication policy.

Only the Communication service is competent to react to social media messages about sexual exploitation or abuse at Enabel's.

Staff members of Enabel must not react personally to such messages.

## **7.5 Integrity Centre at the Federal Ombudsman**

Staff members of Enabel also have the right to contact the Integrity Centre at the Federal Ombudsman to report sexual exploitation or abuse by staff members.

More information on this channel of notification is available in Dutch and French on the website <http://www.federaalombudsman.be/nl/inhoud/meld-een-integriteitsschending>

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<sup>4</sup> Cf. Procedure Crisis committee

## 8 Sanctions

The Management Committee of Enabel will take appropriate measures on the basis of the results of the investigation.

- For staff members of Enabel appropriate disciplinary measures will be determined with Human Resources.
- In case it concerns a staff member of a partner organisation, the partner will be informed about the findings and it will be made clear that the staff member concerned cannot work for Enabel anymore.  
Also, the partner organisation will have to show which measures are taken to prevent such incidents in the future.
- If the management of the partner organisation is itself involved in sexual exploitation or abuse, or if it appears that the incidents are the result of blatant shortcomings in the partner organisation's integrity policy, Enabel will terminate the contract with that partner organisation.

The Management Committee of Enabel may, following advice of the Legal service, decide to take legal action against the offender(s).

The Board of Directors is notified of the sanctions imposed.