



# Safeguarding and Protection from Sexual Exploitation, Abuse and Harassment (SEAH) Policy<sup>1</sup>

## Foreword

RUSI is committed to conducting its business according to all relevant laws and regulations, as well as to a high standard of risk management. The following policy has been formulated in accordance with international standards in Safeguarding and Protection from SEAH.

Safeguarding and SEAH issues commonly occur where there are power imbalances, and victims frequently include women, vulnerable adults and children. RUSI's activities rarely involve close contact with children or vulnerable adults. However, RUSI recognises there may be internal and external power imbalances between its staff and subcontractors as well as with project partners, project participants and other stakeholders. This policy establishes the principles which RUSI has adopted to minimise the risks of harm and SEAH occurring in these interactions.

## Application

This policy is mandatory for all RUSI's employees and subcontractors.

## Purpose and Scope

The purpose of this policy is:

- a) To state RUSI's commitment to do whatever it can to protect potential victims from Safeguarding and SEAH-related harms that result from interactions with RUSI personnel or subcontractors, especially victims from high-risk groups such as children, women and vulnerable adults.
- b) To provide staff, trustees, members, subcontractors and other RUSI representatives with the principles that guide our approach to safeguarding and SEAH-related harms.
- c) To outline the RUSI system for managing reports of Safeguarding and SEAH-related harms.

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<sup>1</sup> This policy does not form part of any employee's contract of employment, and it may be amended at any time.

## Definitions

- a) 'Safeguarding harms' refer to the broader harms and abuses which can be caused to an organisation's staff and anyone who interacts with their staff and activities. Safeguarding harms include SEAH harms, as well as other forms of harm such as physical or emotional abuse or bullying and harassment in the workplace.
- b) SEAH encompasses 'Sexual Exploitation' (SE), 'Sexual Abuse' (SA), and 'Sexual Harassment' (SH):
  - SE constitutes any attempted or actual 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.
  - SA describes the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes sexual assault, rape, molestation, and other forms of non-consensual sexual activity.
  - SH encompasses a range 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', sexual, verbal or physical conduct, or gestures that are or might reasonably be perceived as offensive or humiliating.
- c) Under English Law a "child" is any person under the age of 18 years.
- d) A vulnerable adult is any person over the age of 18 who requires the assistance of a caregiver to conduct daily tasks such as eating, getting dressed, and bathing, or who for whatever reason is unable to protect themselves from exploitation.
- e) The broader definition of "harm" may include:
  - Ill treatment. This includes sexual abuse, neglect, emotional abuse and psychological abuse.
  - The impairment of physical or mental health (including suffering from seeing or hearing another person suffer ill treatment).
  - The impairment of physical intellectual, emotional, social or behavioural development (including suffering from seeing or hearing another person suffer ill treatment).
- f) In considering whether harm is significant to a child's health or development, the child's health and development must be compared with that which could reasonably be expected of a similar child. This includes impairment suffered from seeing or hearing the ill treatment of another person. Section 31(9), Children Act 1989.

## Legal Framework

This policy has been drawn up based on legal and policy frameworks, including legislation designed to protect children and vulnerable adults in England and Wales. This includes alignment with the Safeguarding of Vulnerable Groups Act of 2006 and the principles of the CAPSEAH Minimum Standard and Core Humanitarian Standard, both best practice

frameworks designed to protect stakeholders involved in the delivery of foreign assistance interventions around the world. This policy therefore applies to any association that RUSI may have with any stakeholders globally, in real life or online.

## Guiding Principles

- a) We understand and agree that:
  - Individuals may be at risk of safeguarding and SEAH harms as a result of interactions with RUSI staff, subcontractors or other partners.
  - RUSI has zero tolerance for acts of SEAH and inaction to prevent, report or respond to SEAH, as well as zero tolerance for retaliation against victim-survivors and whistleblowers.
  - Some groups are at particularly high risk of safeguarding and SEAH harms.
  - RUSI has a responsibility to prevent and actively manage and mitigate the risk of SEAH and respond appropriately when it occurs.
  
- b) We recognise that:
  - The welfare of children and vulnerable adults is paramount in all the work we do and in all the decisions we take. All children and vulnerable adults, regardless of age, disability, gender, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse.
  - Some children and vulnerable adults are particularly at risk because of the impact of previous experiences, their level of dependency, communication needs or other issues.
  
- c) We seek to proactively manage safeguarding and SEAH risks for children and vulnerable adults by:
  - Valuing, listening to and respecting them.
  - Maintaining a nominated safeguarding and SEAH protection lead, as well as a senior management lead for safeguarding.
  - Maintaining safeguarding best practices through our policies and procedures for staff, consultants, and other stakeholders.
  - Developing and implementing effective online safety policy and related procedures.
  - Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff, consultants and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently.
  - Recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made.
  - Recording, storing and using information professionally and securely, in line with data protection legislation and guidance.
  - Making sure that children, young people, vulnerable adults and their families know where to go for help if they have a concern.
  - Using our safeguarding and whistleblowing procedures to share concerns and relevant information with the competent authorities and legal guardians.

- Using our procedures to manage any reports of suspected or actual safeguarding concerns or SEAH incidents in an appropriate and victim-survivor centred way.
- Maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise.
- Ensuring that we have effective complaints and whistleblowing measures in place.
- Ensuring that we provide a safe physical environment for any children, young people, vulnerable adults, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.
- Maintaining a safeguarding culture where staff and volunteers, children, young people and vulnerable adults, as well as their families, treat each other with respect and feel comfortable sharing any concern.

## Guidelines for Work Involving Children and Vulnerable Adults

When working with children and vulnerable adults, the following guidelines should also be considered:

- Avoid placing yourself or others in compromising situations or circumstances which could be misinterpreted. Whenever engaging with a child or a vulnerable adult try and ensure that there is a parent or caretaker present, or another member of RUSI's staff.
- Avoid inappropriate use of email/internet. Sending inappropriate messages or using RUSI-owned equipment to visit adult sites is strictly prohibited.
- Do not engage in or allow sexually provocative games to take place.
- Do not touch anyone in an inappropriate or culturally insensitive way.
- Do not make suggestive remarks or actions, even in jest.
- Do not engage in transactional sex or prostitution in any form, whilst engaged on a mission for RUSI.
- Always be respectful and mindful of cultural norms. Be neutral and impartial regardless of race, culture, age, gender, disability, religion, beliefs, sexual orientation or political persuasion.
- Be aware of the power relationships which may exist between RUSI personnel and children/vulnerable adults. Avoid taking any advantage of said relationships and report any concerns to one of the Safeguarding Protection Leads.
- Never encourage inappropriate attention-seeking behaviour such as infatuations.
- Never show favouritism to anyone or spend excessive amounts of time on one child or vulnerable adult.

## Raising Concerns

Any suspected violations of RUSI's Safeguarding and SEAH Policy will require immediate reporting to one of the two Safeguarding and SEAH Protection Leads as identified below.

Internal stakeholders who may wish to make a report, i.e. RUSI staff and subcontractors, will be informed of the reporting mechanism through their obligation to familiarise themselves with this policy. External stakeholders who may wish to report abuse or witnessed abuse will be informed of the reporting process and given the relevant contacts for one of the Safeguarding and SEAH Protection Leads through community mechanisms and procedures developed at the programme level, by the relevant RUSI project lead or subcontractor (e.g., through stakeholder communication in interview protocols).

Potential means of reporting include:

- Witness reports of attempted, actual, or suspected safeguarding or SEAH-related violations by RUSI staff or subcontractors.
- Allegations of safeguarding or SEAH-related harms from victims who have interacted with activities under a RUSI-led programme.

## Responding to Reports

All reports will be subjected to the strictest confidentiality and all efforts will be made to ensure the possible victim is immediately protected from any potential further harmful conduct. All concerns raised should describe the suspected violation to this policy in as much detail as possible, including the people involved, the reasons why a concern is being raised and the date, time and place the potential violation occurred.

The information should be recorded by the Safeguarding and SEAH Protection Lead who receives the report, which will be subject to the same high levels of confidentiality and stored securely in a restricted access folder in RUSI's data storage platform.

Upon receiving a report, the Safeguarding and SEAH Protection Lead will immediately inform the Senior Lead. The Senior Lead will then decide:

- a) What immediate actions may need to be taken to protect the victim from the risk of further harm.
- b) How to inform other SMT members.
- c) Whether there are sufficient grounds for a further investigative process to be initiated (in the case of an accused staff member), in line with existing RUSI procedures.
- d) Whether there are sufficient grounds to seek legal advice as to whether to inform the relevant law enforcement authorities.
- e) Whether and when, if the alleged incident is linked to a specific project, the funder of that project should be informed.

## Contact Details

### Safeguarding and SEAH Protection Lead

- Director of Human Resources (currently Constance Ekpenyong)
- Email: ConstanceE@rusi.org

### Senior Lead for Safeguarding and SEAH Protection

- Name: Director-General (currently Karin von Hippel)
- Email: KarinvH@rusi.org

## Version control

<b>Author</b>	<b>First drafted</b>	<b>Approval date and approving body</b>	<b>Latest update</b>
Constance Ekpenyong	05/2021	05/2021 – Approved by HR	9/10/23
Malcolm Chalmers	10/2024	10/2024 – Approved by SMT	