



Safeguarding and Sexual Exploitation, Abuse and Harassment Prevention Policy¹

Foreword

RUSI is committed to conducting its business according to all relevant laws and regulations, as well as ensuring it complies with its obligations and manages the risks it is exposed to adequately. In this sense, RUSI is committed to preventing anyone from being subjected to any form of Sexual Exploitation, Abuse and Harassment (SEAH)

This policy is meant to clearly establish the principles which shall guide any interaction that RUSI staff or its subcontractors may have with any individual to adequately prevent SEAH in all its forms. All RUSI staff must have a zero tolerance for inaction when it comes to SEAH. RUSI will take all reasonable steps to prevent SEAH and will respond appropriately if any reports linked to SEAH arise.

Application

This policy is mandatory for all RUSI's employees, contractors and subcontractors (defined as "Staff") and should be abided by even if there are contractual obligations, policies or procedures which contradict the guidelines established herein. It applies to The Royal United Services Institute for Defence and Security Studies (registered charity no.210639, Whitehall, London SW1A 2ET), and its subsidiaries and affiliated companies or organisations controlled by the Royal United Services Institute for Defence and Security Studies (collectively, "RUSI") and therefore all those employed or engaged by RUSI.

Purpose and Scope

The purpose of this policy is:

- a) To protect all individuals, who may have some association with RUSI, from being sexually exploited, abused, and/or harassed.
- b) To provide staff, trustees, members, subcontractors, consultants and any other RUSI stakeholders with the overarching principles that guide our approach to preventing SEAH.

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

Definitions

- a) Sexual Exploitation is defined as an actual or attempted abuse of someone's position of vulnerability (such as a person depending on you for survival, food rations, school, books, transport, or other services), differential power or trust, to obtain sexual favours, including but not only, by offering money or other social, economic, or political advantages. It includes trafficking and prostitution².
- b) Sexual Abuse is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It includes sexual slavery, pornography, child abuse and sexual assault³.
- c) Sexual Harassment is defined as any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation. Sexual harassment may occur in the workplace or in connection with work and may either involve a pattern of conduct or take the form of a single incident. Even when no offense was intended by a specific behaviour, what matters when assessing if a conduct constitutes Sexual Harassment, is the victim's perspective. The following are some examples of conducts which constitute Sexual Harassment: sharing or displaying sexually inappropriate images or videos in any format; sending sexually suggestive communications in any format; sharing sexual or lewd anecdotes or jokes; making inappropriate sexual gestures, unwanted touching (such as pinching, patting or rubbing) amongst others⁴. As Sexual Harassment may impact RUSI employee relations, it is covered in more depth in [RUSIs Bullying and Harassment Prevention Policy](#).

Legal Framework

This policy has been drawn up based on legislation, policy and guidance that seeks to protect individuals from SEAH. It applies to any activities conducted by RUSI around the world.

Guiding Principles

- a) RUSI and RUSI Staff understand and agree that:
 - Individuals should never experience SEAH of any kind.
 - We have a responsibility to promote the welfare of individuals, as well as keep them safe and protected.
- b) RUSI and RUSI Staff recognise that:
 - The welfare of all people is paramount in all the work we do and in all the decisions we take. All individuals, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of SEAH.

² The UN Refugee Agency. [“What is Sexual Exploitation, Abuse and Harassment?”](#)

³ Ibidem.

⁴ Ibidem.

- Children⁵ and vulnerable adults⁶ may be particularly at risk of being subjected to SEAH due to their level of dependency, communication needs, impact of previous experiences, and/or other issues.
- c) RUSI and RUSI Staff will seek to keep individuals safe by:
- Valuing, listening to and respecting them.
 - Appointing a nominated safeguarding lead, as well as a deputy and senior management lead for safeguarding.
 - Maintaining safeguarding best practices through our policies, procedures, and code of conduct for staff, consultants, subcontractors, volunteers, and other stakeholders.
 - 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 all individuals that RUSI may come in contact with are aware that any concerns they have in relation to this policy may be reported through the channels listed below.
 - Using our whistleblowing procedures to share concerns and relevant information with the competent authorities.
 - Using our procedures to manage any allegations against staff and volunteers appropriately.
 - 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 all by applying health and safety measures in accordance with the law and regulatory guidance.
 - Maintaining a safeguarding culture where everyone treats each other with respect and feel comfortable sharing any concern.

Guidelines for the prevention of SEAH

To effectively prevent SEAH, the following guidelines must be considered:

- Any form of SEAH by RUSI Staff constitutes an act of gross misconduct and is therefore grounds for termination of employment/contractual relationship.

⁵ Under English Law a “child” is any person under the age of 18 years.

⁶ A vulnerable adult is any person 18 years old or over and who for any reason requires the assistance of a caregiver to conduct daily tasks such as eating, getting dressed, bathing, etc, or who for whatever reason might be particularly vulnerable to SEAH.

- Sexual activity with children (any person under the age of 18) is strictly prohibited regardless of the age of majority/consent locally. Mistaken belief regarding the age of a child is not a defence.
- RUSI Staff must not engage in transactional sex or prostitution in any form. Any exchange of money, employment, goods, or services for sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited.
- Any sexual relationship between RUSI Staff and individuals participating in RUSI projects as interviewees or sources which involve improper use of rank or position is strictly prohibited. Such relationships undermine the credibility and integrity of RUSI's work.
- Where one of RUSI's Staff develops concerns or suspicions regarding SEAH by a fellow worker, whether in the same project/team or not, they must report it using the channels described below.
- RUSI Staff must create and maintain an environment which prevents SEAH and promotes a culture of respect. Line managers must support and develop systems which maintain this environment.
- RUSI Staff should avoid placing themselves 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.
- RUSI Staff should avoid inappropriate use of email/internet. Sending inappropriate messages or using RUSI-owned equipment to visit adult sites is strictly prohibited.
- RUSI Staff must not engage in or allow sexually provocative games to take place.
- RUSI Staff must not touch anyone in an inappropriate or culturally insensitive way.
- RUSI Staff must not make suggestive remarks or actions, even in jest.
- RUSI Staff must 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.
- RUSI Staff should be aware of the power relationships which may exist between RUSI Staff and other employees/individuals. Avoid taking any advantage of said relationships and report any concerns to the Safeguarding Protection Lead.
- RUSI Staff should never encourage inappropriate attention-seeking behaviour such as infatuations.
- RUSI Staff should 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 SEAH Policy will require immediate reporting to the Safeguarding Protection Lead. Potential violations which require reporting include:

- Witnessed or suspected SEAH

- Allegations of SEAH from someone outside of RUSI, including reports made by children and vulnerable adults and/or their family members/caretakers

All reports will be subjected to the strictest confidentiality, as established in the [Whistleblowing Policy](#) and swift and appropriate action will be taken to stop further harm from occurring, as well as investigating and reporting to relevant authorities (for criminal matters) when safe to do so and after considering the wishes of the survivor. It is understood that informing authorities of any SEAH reports are subjected to not compromising the safety, security, privacy, and due process rights of any concerned person.

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 where the potential violation occurred.

Upon receiving a report, the Safeguarding Protection Lead will investigate and determine if:

- Any authorities need to be informed
- Disciplinary action is required
- Whether the report is linked to a project funded by the FCDO and therefore requires reporting at reportingconcerns@fcdo.gov.uk.

Contact Details

Safeguarding Protection Lead

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Version control

Author	First drafted	Approval date and approving body	Latest update
Constance Ekpenyong	05/2021	04/05/2023 – Approved by Senior Management	20/04/2023