



PRAKSIS “POLICY ON THE PREVENTION OF SEXUAL EXPLOITATION & ABUSE (PSEA)”

I. GENERAL

PRAKSIS' main goal is the elimination of social and economic exclusion of vulnerable groups of people and the protection of their personal and social rights. In this context, protection of vulnerable groups is a fundamental principle of the organization.

The purpose of this Policy and the procedures described herein is to provide a framework for the services provided in order to truly protect and promote the beneficiaries' best interest as well as all those who provide their services to beneficiaries, i.e., employees, volunteers, collaborators and who are required to act in a specific manner that ensures the protection of all and ensure that our actions or activities **do not cause them any harm**.

For that purpose, PRAKSIS is compliant with various laws and regulations of EU, UN and Greek national legislation. Among others, PRAKSIS is compliant with the Greek Law 4808/2021 for preventing violence, harassment and sexual harassment, and its procedures and policies.

PRAKSIS staff members should receive training and information on preventing and responding to acts of sexual exploitation in a timely and appropriate manner. Any suspicion of sexual exploitation or abuse of any beneficiary should be reported immediately to PRAKSIS.

II. PROCEDURE & ROLES

If any staff member has any doubt whatsoever regarding his / her conduct or another colleague's way of conduct, he/she is strongly advised to address such issues to the appointed "**PSEA Focal Point**" of the organization. This communication can be achieved via email at the following address: protection@praksis.gr. Following such a development, PSEA Focal Point proceeds with registering such incidents and completes all relevant documents. This person keeps track of numbers of incidents reported, collects and keep track of all data available. All data is subject to internal data protection principles and guidelines.

All info about the incident is provided to the "**Management Team for Sexual Exploitation & Abuse and Child Safeguarding issues (SEA & Ch. S. Management Team)**". This Team consists of PRAKSIS' Programs' Director, Health Department's Director and the Head of Protection Issues. It is responsible in proceeding with the task of reading the documents related to the reported incident and also is able to communicate with any of the relevant parties involved. Based on these documents, a written opinion will be issued based on the incident reported.

Once this stage is being completed, the SEA & Ch. S. Management Team will refer the case, together with its opinion, to a Committee entitled "**Management Board for the Code of Conduct Violation Issues**". The Management Board

for the Code of Conduct Violations Issues consist of the General Director, the Coordinator of the Legal Service and the Director of Human Resources.

The Committee will assess all information gathered at the initial stage of the procedure and will propose necessary measures to “**PRAKSIS Administrative Board**”, which will ultimately decide based on all of the above information.

III. DEFINITIONS

1. Sexual Harassment

Sexual harassment is an unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature, which makes a person feel offended, humiliated and/ or intimidated, where a reasonable person would anticipate that reaction in the circumstances.

2. Sexual Exploitation

Any actual or attempted 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 person (s).

3. Sexual abuse

Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive condition.

4. Child

A human being below the age of eighteen (18) years.

5. Beneficiaries

The people PRAKSIS works with or seeks to assist, who are typically in situations of vulnerability and dependence vis a vis PRAKSIS member staff. Beneficiaries are individuals who are direct or indirect recipients of humanitarian / emergency aid and/ or other PRAKSIS action(s) / service(s) in any program(s) / structure(s)/ premises.

6. Members staff

Employees, volunteers, collaborators.

IV. PRINCIPLES

In order to protect the all and ensure the integrity of PRAKSIS’ activities, the following Core Principles must be respected:

1. Sexual exploitation and abuse are prohibited and such acts are considered as serious misconduct, which may constitute grounds for disciplinary sanctions, including dismissal/ termination of employment and/ or criminal proceedings.
2. Exchange of money, employment, goods, assistance or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior by staff members towards beneficiaries is forbidden.

3. It is forbidden to engage in any form of sexual relations with anyone under eighteen (18) years old. Any false estimate as to the child's true age is certainly not an excuse whatsoever and is punishable by law.
4. PRAKSIS member staff must not support or take part in any form of sexual harassment, exploitative or abusive activities whatsoever.
5. PRAKSIS member staff who deliver professional services directly to beneficiaries have a duty not only to abstain from having sexual relationships with the recipients of our services, but also to report any instance where they may suspect or detect signs of sexual exploitation and abuse, including any concern or suspicion regarding sexual abuse or exploitation by a fellow colleague.
6. PRAKSIS member staff are obliged to protect, manage and utilize PRAKSIS' human, financial and material resources appropriately and will never use PRAKSIS' resources, including the use of computers, cameras, mobile phones or social media, to exploit or harass beneficiaries of PRAKSIS' programs, children or others in the community.
7. PRAKSIS member staff are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of this Policy.
8. Organization and implementation of training sessions and provision on information on preventing and responding to acts of sexual exploitation.

IV. COMMITMENTS

PRAKSIS member staff complies with our core principles in the context of the prevention of sexual exploitation and abuse (PSEA) through the implementation of the following commitments:

1. Incorporation of PRAKSIS' standards in preventing sexual exploitation and abuse in all relevant codes of conduct and induction materials and trainings for PRAKSIS' member staff colleagues.
2. Communication of all issues and prohibitions related to sexual harassment, exploitation and sexual abuse to PRAKSIS member staff, through specific documentation that will be included in their contracts of employment or provision of voluntary services.
3. Ensuring that complaint mechanisms for reporting sexual harassment, sexual exploitation and abuse are accessible at all times. This includes direct communication with "**PRAKSIS PSEA Focal Point**" as well as with "**PRAKSIS SEA & Ch. S. Management Team**" for the direct reporting on suspicion or detection of signs of SEA; the operation of the protection@praksis.gr email address for reporting on any SEA incidents both by its member staff and beneficiaries; the operation of complaint boxes accessible to beneficiary population in every PRAKSIS' structure. Additionally, there should be information available that shows the way to report such incidents (i.e., posters at the organization premises).
4. Investigation of all allegations of sexual exploitation and abuse in a timely and professional manner as well as taking of appropriate actions in order to protect persons from retaliation where allegations of SEA are reported involving PRAKSIS' member staff.

5. Acting directly and appropriately, including legal action when required, against any PRAKSIS member staff who commits sexual exploitation and abuse. This may include administrative or disciplinary action, and / or referral to the competent authorities for further action to be taken.
6. Ensuring that when photographing or filming a beneficiary, his/her written consent form is firstly obtained, explaining how the material will be used and ensure that images are genuine and honest representations of the context and the facts. More information on the collection of consent forms is provided in Annex 1 “Data Protection Policy”.
7. Sensitive information related to incidents of sexual exploitation and abuse whether involving colleagues, beneficiaries or others in the community must be shared following PRAKSIS’ procedures - as already described above in the “*General Part*” of this Policy and as further detailed in Annex 1 “Data Protection Policy”. Moreover, sensitive information related to incidents of sexual exploitation and abuse whether involving colleagues, beneficiaries or others in the community may be shared with relevant Authorities according to the relevant legal procedures and referral mechanisms.
8. Breach of this Policy may put others at risk and will therefore, result in disciplinary procedures.

ANNEX 1

PERSONAL DATA STANDARD OPERATING PROCEDURE (SOP) IN THE CONTEXT OF INVESTIGATING ALLEGATIONS OF SEXUAL EXPLOITATION AND ABUSE.

1. INTRODUCTION

PRAKSIS acknowledges the need for a separate plan and procedure (hereinafter referred to as the "**Procedure**") for the protection of personal data including special categories of data as defined in article 9 par. 1 of EU Regulation 2016/679 (hereinafter "**GDPR**") in the context of the investigation of allegations regarding sexual exploitation and abuse of beneficiaries [as defined above in PRAKSIS Policy on the prevention of sexual exploitation & abuse ("**Policy**")].

The following Procedure sets out the framework for the processing of personal data received and processed in the context of the investigation of an allegation for sexual harassment or abuse in compliance with the General Data Protection Regulation (EU) 2016/679. The Procedure aims to ensure that PRAKSIS will be able to protect beneficiaries' and member staff' personal data (including sensitive data) while maintaining an effective complaint mechanism, which respects the safety and well-being of the complainants as well as the confidentiality, integrity and transparency of the whole procedure.

2. DEFINITIONS

«General Data protection Regulation»	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (" GDPR ").
«Personal Data»	Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person
«Processing»	Any operation or set of operations, which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
«Consent» of the data subject	Any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

«Personal Data Breach»	'Personal data breach' means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;
«Employees »	For the purpose of this policy, “employees” means any person engaged with any employment relationship with PRAKSIS; former employees and volunteers shall be included.

3. PROCEDURE

3.1 Privacy Notice

Upon receipt of a complaint, PRAKSIS PSEA Focal Point shall provide the complainant with the privacy notice and consent form prepared by PRAKSIS. In the case of a complaint by email, the above text shall be forwarded through e-mail and returned signed to PRAKSIS PSEA Focal Point. If the person who reports the concern or suspicion of sexual harassment is different from the survivor, then a different notice form shall be provided to the complainant and in case the identity of the survivor is made known to PRAKSIS during the investigation of the complaint, then a notice and consent form shall be also provided to the survivor. If the survivor wishes to remain anonymous, then the privacy notice shall include information about his/ her right to anonymity and the possibility of proceeding with reporting the incident without providing any identifiable information or if he/ she chooses to provide Personal Data, his/ her right to request deletion/ restriction of processing or to withdraw his/her consent for processing (if the consent is the lawful bases for processing).

3.2 Pseudonymization/anonymization of personal data

3.2.1 The identification data of the complainant and the survivor (if different) must be known only by those who, within the organization of PRAKSIS, have absolute necessity and authority to do their job. Same applies for the Personal Data of the alleged perpetrator. These are the aforementioned bodies (PSEA Focal Point; Management Team for Sexual Exploitation & Abuse and Child Safeguarding issues; Management Board for the Code of Conduct Violation Issues; PRAKSIS Administrative Board).

3.2.2 For any other cases, staff should receive pseudonymized data (key-coded) and if the survivor wishes to remain anonymous, then the whole procedure shall be carried out without providing survivor’s Personal Data.

3.3 Retention Period

The identification data of the complainant/ survivor and the alleged perpetrator collected during the investigation will be kept for the necessary period, in accordance with current regulations. Specifically, Personal Data will be made anonymous within **three (3) months** from complaint closure and in any case no later than two (2) years from the end of the year in which the complaint was notified. The previous paragraph does not apply in cases where during the investigation of the allegation, it becomes apparent that the incident constitutes a criminal offense according to the Greek legal framework and in this case, the Personal Data may be retained in file until the criminal and civil court procedures are considered terminated.

3.4 Incident Report Forms

The identification data of the reporter/ survivor must not be included in the report prepared by PSEA Focal Point and the SEA & Ch. S. Management Team (as defined above in the Policy), unless it is necessary for the handling of the allegation. In such case, the identification data should be known only by those who, within the organization of PRAKSIS, have absolute necessity to have access to the report in order to investigate the allegation and for the staff who is not actively involved in the investigation, full access to the content of the report shall not be permitted or, if necessary, access shall be permitted only to pseudonymised or anonymized data.

3.5 Transfers of Personal Data to third parties

The Incident Report Forms including Personal Data shall not be transferred to third parties outside PRAKSIS. However, in case where a crime appears to have been committed, Personal Data may be transferred to competent national Authorities including the Hellenic police, lawyers, official judicial or investigating authorities upon formal request and orders.

3.6 Security Measures

3.6.1 While investigating allegations for sexual harassment and/ or abuse, PRAKSIS member staff, processors, assistants, agents will implement appropriate technical and organizational measures to ensure, as much as possible, the most appropriate protection of data subject's (complainant/ survivor and the alleged perpetrator) Personal Data against accidental or unlawful destruction, loss, alteration, unlawful disclosure or access to them and any unlawful processing, as well as to ensure the possibility of restoring availability and access to them.

3.6.2 In the event that a Data Breach occurs and as a result, the data subject has suffered damages, the data subjects have the right to complain to the competent supervisory authority (Personal Data Protection Authority) and such information shall be included in the Privacy Notice described under Section 3.1.

3.7 Confidentiality

All staff involved in the investigation procedure should be bound by terms of privacy and confidentiality. PRAKSIS shall ensure at all time that its employees, processors, assistants, agents comply with strict data processing and security standards and act only on PRAKSIS instructions, have been specifically authorized for the purpose of the investigation and are fully committed to maintaining the confidentiality of Personal Data and complying with the obligations set forth in GDPR and any other applicable privacy and data protection laws and regulations.

3.8 Children's Policy

PRAKSIS shall remain committed to protecting the privacy of children. Any investigations involving minors shall be carried out in high confidentiality taking into account the increased negative impact that a possible disclosure of the identity of a child may have in his/ her social and emotional development. Access to an investigation report involving children shall be restricted to a very limited number of trained and specialized persons, and the authorized consent

of the holder of parental responsibility over such child for the processing of their Personal Data (including special categories data), shall be promptly provided before any such investigation begins. Information on the processing of their Personal Data shall be provided to minors based on their level of maturity and in a plain, understandable language.

3.9 Photographing/ filming

If for the purpose of the investigation, it becomes necessary to record a video or take photos of the survivors, then the informed consent of the affected persons shall be collected. This consent form shall be different from the consent form collected for the investigation, and any possible refusal to provide his/ her consent for the filming/ photographing, shall not affect the development of the investigation.