



Policy against Sexual Exploitation, Abuse and Harassment



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1. Purpose and Scope

- i. Beyond the Horizon International Strategic Studies Group (BtH) is dedicated to providing a safe and respectful environment for its staff, partners, and participants in its activities. As BtH, we **maintain a zero-tolerance stance against all forms of sexual exploitation, abuse, and harassment (SEA-H)**. We aim to foster a workplace that exemplifies integrity, respect, and fairness, reflecting our commitment to ensuring a safe working environment for all.
- ii. Sexual exploitation, abuse, and harassment (SEA-H) result from a culture of discrimination and privilege based on unequal gender relations and power dynamics. It creates hostile workplaces, which limit the target/victim/affected individual's ability to thrive. Sexual harassment has no place in BtH.
- iii. This policy reflects the BtH principles and practices in pursuit of development, peace, and human rights and applies them to workplace conduct.
- iv. BtH must take all appropriate steps to prevent and respond to sexual SEA-H in the BtH workplace. All forms and expressions of sexual harassment are prohibited in the BtH, regardless of national criminal or other provisions where any such behaviour or actions occur.
- v. This policy document reflects a system-wide common approach and understanding to support those who report or witness SEA-H and ensure accountability of those who perpetrate it. BtH's goal in this policy is to strengthen victim-centred efforts and foster safe, equal, and inclusive working environments. This policy will support efforts to create workplaces free of SEA-H and all gender inequalities.
- vi. This policy applies to all BtH employees, contractors, interns, and volunteers, regardless of position or location. It encompasses all professional contexts, including the workplace, during work-related travel, at events sponsored by BtH, and in digital communications.
- vii. BtH also undertakes to improve the understanding of sexual exploitation, abuse, and harassment across the think tank's community to prevent it from occurring. It also fosters a culture of support that promotes incident reporting and guarantees that it is handled delicately and responsibly. It is acknowledged that any person impacted by the disclosure of sexual exploitation, abuse, and harassment may experience distress; the purpose of this policy is to guarantee that everyone is handled with respect and decency and given the necessary assistance. The focal point to address all SEA-H related acts and initiatives is BtH HR Office.

2. Definitions

- i. **Consent** is the ability to give permission for something to occur or the willingness to act after being fully informed of the circumstances and free from coercion. Consent for sexual action must be expressly given, either verbally or nonverbally. It cannot be assumed. It cannot be assumed that someone has given their consent under duress or when they are incapable of giving it. One may revoke their consent at any moment.
- ii. **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.
- iii. **Sexual Abuse:** Any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

- iv. **Sexual Harassment:** Any unwelcome sexual advance, request for sexual favours, or other verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment.

Sexual harassment can take a variety of forms – from looks and words to physical contact of a sexual nature. Examples of sexual harassment (non-exhaustive list) include:

- Attempted or actual sexual assault, including rape,
- 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, such as pelvic thrusts,
- Unwelcome touching, including pinching, patting, rubbing, or purposefully brushing up against another person,
- Staring in a sexually suggestive manner,
- Repeatedly asking a person for dates or asking for sex,
- Rating a person's sexuality,
- Making sexual comments about appearance, clothing, or body parts,
- Name-calling or using slurs with a gender/sexual connotation,
- Making derogatory or demeaning comments about someone's sexual orientation or gender identity.
- [...]

- v. **Target/victim/affected individual:** The person or persons in the workplace or in connection with work towards whom the conduct constituting possible sexual exploitation, abuse, and harassment is directed.
- vi. **Offender/alleged offender:** The person or persons in the workplace or in connection with work whose conduct constitutes SEA-H act, if established under applicable policies, or possible sexual harassment.
- vii. **Impacted individuals:** Individuals that may include the target/victim/affected individual as well as witnesses and persons who intervene in the situation involving inappropriate behaviour and possible SEA-H act.
- viii. **Report:** Any formal and informal reporting unless otherwise specified.

3. Policy Principles

- i. BtH will not tolerate any form of Sexual Exploitation, Sexual Abuse, or Sexual Harassment (SEA-H).
- ii. BtH will take all available measures to prevent, mitigate, investigate, and remedy SEA-H in BtH-related activities. Moreover, the community will actively promote equality to provide a collegiate, lawful, and harmonious working and learning environment.
- iii. BtH will endeavour to raise SEA-H awareness among BtH individuals and its partners involved in the think tank's activities.

4. Obligations

- i. BtH must adhere to this SEA-H Policy's tenets and help establish and preserve an atmosphere that forbids SEA-H.
- ii. It is not acceptable for BtH individuals to support, encourage, take part in, or partake in SEA-H in BtH-related activities. They specifically should not use their position to harass, abuse, or sexually abuse anyone who is involved in, profiting from, or executing BtH-related activities.
- iii. BtH employees should not engage with any third party that condones, encourages, participates in, or engages in SEA-H.
- iv. In case of discovery of SEA-H practices, BtH undertakes, in accordance with the wishes of the victims, to announce without delay what happened to the authorities and to cooperate with investigations into sexual exploitation and abuse, by providing the requested information, documentation and evidence.

5. Prevention

- i. Beyond the Horizon International Strategic Studies Group (BtH) will regularly review and make its SEA-H policy publicly available on its website and ensure it is an integral part of the onboarding process for new staff.
- ii. All employees will undergo training to recognise, prevent, and respond to incidents of SEA-H. This training will be refreshed annually to ensure it remains adequate and relevant.
- iii. Management is responsible for upholding the standards set out in this policy and supporting staff in understanding and fulfilling their responsibilities regarding SEA-H.

6. Reporting

Reports of sexual harassment in the workplace or connection with work can be made by any person and against any person, irrespective of whether such persons have any contractual status with an entity.

Staff members who are alleged to have committed sexual harassment will be subject to possible disciplinary or other administrative action. Non-staff personnel who are alleged to have committed sexual harassment will be subject to action in accordance with the terms and conditions of their contract and other applicable policies regarding such non-staff personnel. The action of the reports will depend on the status of the alleged offender.

In any case, the specific contractual status of a target/victim/affected individual should not constitute a barrier to filing a complaint.

i. **Complaints by Staff:**

- a. **Non-formal complaint:** Staff are encouraged to speak informally with their supervisor or HR representative to resolve issues before they escalate.
- b. **Formal complaint:** If the issue is not resolved informally, or if the staff member prefers, they may file a formal complaint through an internal complaint mechanism, which will be handled with confidentiality and urgency.

ii. **Complaints by External Persons:** External individuals are encouraged to report

incidents of SEA-H through BtH's designated external reporting channel or sending an email with details to both the President and the HR Manager of BtH .

Employees at BtH are committed to reporting any suspicions, concerns, rumours or complaints that BtH or non-staff personnel have committed sexual exploitation and abuse.

If possible, BtH encourages to be specific and report without delay to HR:

- WHO was involved,
- WHAT happened,
- WHERE did it happen,
- WHEN did it happen.

Reporting should be made only after a certain set of real or perceived proof has accumulated. Due to the fact that any such reporting, in case it is false, besmirches the name of the involved and creates a stigma, it should not be leveraged unless this criterion is met.

BtH encourages and supports any complaint, official or not, as long as it is made in good faith. Malicious complaint of sexual exploitation and abuse known to be false and therefore made in bad faith will result in disciplinary action and possibly reporting to the authorities.

BtH will walk the thin line of maintaining good working and collaboration conditions while taking necessary precautions to avert conduct of any SEA-H act.

7. Early intervention and receipt and handling of informal reports

Early direct action

- i. Targets/victims/affected individuals may voluntarily, if they feel comfortable and safe doing so, approach alleged offenders about inappropriate behaviour or instances of possible sexual harassment and ask for such behaviour or instances to stop, as the alleged offenders may not be aware of the negative impact of their behaviour on others. However, the disparity in power or status, fear of retaliation or the nature of the behaviour and instances of possible sexual harassment may make confrontation difficult, and there is, therefore, no requirement for such action to be taken.

Directorate intervention

- ii. Targets/victims/ affected individuals who believe they may have been subject to inappropriate behaviour or instances of possible sexual harassment may raise this with their supervisor or other officials in their workplace hierarchies if the situation allows and they feel comfortable doing so. Any BtH director approached by a target/victim/affected individual shall inform that person that confidential advice, assistance and information about the options available under BtH's legal framework to address such possible conduct may be obtained from HR Manager.
- iii. Directors should provide advice, assistance and information in a timely, sensitive and impartial manner by providing an opportunity for facilitated discussion among colleagues about the conduct in question; also refer to the possibility of enlisting support from HR Manager, providing advice/assistance. The intervention may address the matter promptly at the directorate level. A record will be maintained consistent with and as specified in BtH's policy about the matter and any directorate intervention taken.
- iv. Any director who has been informed about inappropriate behaviour or instances of possible

sexual harassment shall sensitively and impartially support targets/victims/affected individuals. If a director cannot perform this role for any reason, the director shall, in consultation with the BtH HR Office, refer the colleague to another trained and trusted point of contact within BtH.

Confidential advice

- v. Targets/victims/affected individuals may prefer and are encouraged to discuss their situation with a confidential, informal resource, such as [ombudsman or another confidential provider of advice/assistance], who can assist the targets/victims/affected individuals by explaining the applicable legal framework and the options available under an entity's policies and practices and indicate resources available for support purposes.

Informal resolution

- vi. Targets/victims/affected individuals may voluntarily wish to deal with the situation of possible sexual harassment in an informal manner.
- vii. Targets/victims/affected individuals may seek informal resolution by contacting BtH HR Office.
- viii. With the consent of the target /victim/affected individual, HR Manager may meet informally with the alleged offender to provide information about the situation and discuss how it might be resolved.
- ix. An unsuccessful attempt to resolve the matter informally does not preclude it from being formally reported.

8. Receipt and handling of formal reports of SEA-H

- i. Formal reports of possible SEA-H may be made by persons who consider that they were the targets /victims/affected individuals or by persons who have direct knowledge of potential harassment or by any third party. Formal reports may be made anonymously and are not subject to deadlines. The anonymity of reports and the passage of time may result in reports of SEA-H that may be more difficult to investigate and pursue through internal disciplinary proceedings. In such cases, the responsible authorities will determine whether there is a sufficient basis to move forward at each process stage.
- ii. A formal report of SEA-H shall, to the extent possible, describe the specific incident(s) of possible SEA-H act or a pattern of possible SEA-H. The formal report should include as much detail as possible. For example, the report could include the following:
 - a. Name of the alleged offender;
 - b. Name of alleged target/victim/affected individual if a third party makes the report;
 - c. Date(s) and location(s) of incidents;
 - d. Description of incident(s)/patterns;
 - e. Names of witnesses, if any;
 - f. Any other relevant information, including documentary evidence, if available;
 - g. Date of the submission of the report and name of the person making the report, unless the report is made anonymously;
 - h. Suppose the person making the report chooses to report anonymously. In that case, the reporter must provide sufficient information concerning the basis of the allegations and adequate detail or supporting factual basis to pursue the matter responsibly. Otherwise, the matter typically cannot be pursued further.

- iii. The HR Office will promptly assess the report based on BtH’s applicable policies and practices to decide if BtH will initiate an investigation.
- iv. The HR Office may refer a report to another appropriate office or, with the consent of the target /victim/affected individual, to another appropriate official to resolve the matter informally for assessment and action.
- v. In cases where the formal report of possible sexual harassment is submitted by a person other than the target/victim/affected individual, the investigative body should consider the views or the situation of the target /victim/affected individual before deciding whether to proceed with an investigation.
- vi. BtH is committed to ensuring that allegations of sexual harassment are investigated in an impartial, thorough and timely manner with any conflicts of interest appropriately addressed, that investigations are conducted fairly to all parties concerned, and that the rights of all parties are fully protected. Investigations are conducted in line with BtH’s SEA-H Policy, and any subsequent disciplinary process will be undertaken in line with BtH’s policy governing that process.
- vii. Any formal report of possible SEA-H act should be acknowledged by the receiving official, be it HR Manager or any other Director. The target/victim/affected individual shall be informed, as appropriate, of the status of any investigation and the outcome of the report. The alleged offender will also be informed of the outcome of the report. The provision of such information shall respect the regulations and rules on confidentiality as applicable to the alleged offender and the targets/victims/affected individuals.
- viii. If, following an investigation, BtH concludes that there are credible allegations of possible criminal conduct, the underlying matter shall be treated by the applicable legal framework or practices of BtH concerned, including potential disciplinary/administrative action and referral of the allegations to national authorities. The entity recognises that the target/victim/affected or impacted individual can always choose to report possible criminal conduct directly to national authorities.

9. Prevention

- i. BtH is committed to promoting a working environment free of sexual exploitation, abuse, and harassment in which everyone is treated respectfully.

Obligations of BtH

- ii. BtH will:
 - a. take appropriate measures to promote a harmonious working environment and protect personnel from SEA-H act(s) through preventive measures and, if such conduct has occurred, through action under articles 7 and 8 of this policy;
 - b. screen candidates using the “clear check” database during recruitment processes;
 - c. undertake diligent reference checks of external candidates during recruitment processes to ensure that individuals who have a documented history of SEA-H are not hired;
 - d. request that contractors, suppliers, and partners adhere to zero-tolerance for SEA-H acts and commit to taking adequate action if faced with SEA-H act allegations, in the absence of which contractual arrangements can be terminated;
 - e. provide targeted, preferably in-person training for directors and personnel designated to provide support on SEA-H under BtH’s policy on the prevention

of SEA-H, building the skills necessary to effectively communicate with targets/victims/affected individuals of sexual harassment and to respond appropriately;

Obligations of staff

- iii. Staff members should:
 - a. undertake mandatory training, including during induction or the onboarding process, to set the behavioural expectations and familiarise themselves with this policy and related policies and procedures, including BtH HR policy;
 - b. attend other training opportunities related to SEA-H to the extent possible;
 - c. demonstrate commitment to zero-tolerance for SEA-H acts and treat all people in the workplace with courtesy and respect with an awareness of their behaviour and how it may be perceived and received by others;
 - d. refrain from encouraging other staff members and non-staff personnel to engage in sexually harassing or abusive behaviour;
 - e. raise their awareness through available training about the particular harassment threats that trans and gender non-conforming individuals can face;
 - f. be encouraged to take action where appropriate and where they feel comfortable and where possible after consulting with the target/victim/affected individual if they witness sexually harassing or discriminatory conduct, and support those impacted as appropriate and to the best of their ability; and
 - g. report possible misconduct and cooperate with investigations, audits and reviews.
- iv. Adherence by all staff to their obligations under BtH's SEA-H policy shall be reflected in work plans and performance evaluations or otherwise periodically reviewed with staff by BtH's policy and practice, including through 360 reviews, where possible, especially in the cases of those with directorate responsibilities. Failure to adhere to the policy on sexual harassment by any staff member constitutes possible misconduct and violation of the applicable provisions of BtH's policies and practices.

10. Support

Support to targets/victims/affected individuals

Confidential guidance and support

- i. BtH acknowledges that guidance and support to the target/victim/affected individual may be required at different stages, including:
 - a. Before making a complaint regarding options to address the matter,
 - b. During any formal or informal process,
 - c. Managing confidentiality requirements;
 - d. At and following the conclusion of any formal or informal process or investigation.
- ii. The following confidential guidance and support is available for targets/victims/affected individuals or other impacted individuals through HR Manager who can make referral to external appropriate services which can offer additional psychological and legal support.
- iii. The following types of support may be available in BtH for staff members and non-staff personnel:

- a. information and advice on the informal and formal reporting options which are available within BtH;
 - b. information on hotlines/helplines;
 - c. psycho-social counselling;
 - d. information on low-cost health insurance applicable for personnel who do not have insurance;
 - e. advice and referral to internal and external local services specialising in sexual harassment, violence against women, violence against LGBTIQ+ individuals, including gender non-conforming individuals or support for men who experience violence, to the extent available;
 - f. support and guidance on how to report to and what to expect from the local authorities, mainly if the alleged behaviour constitutes a crime;
 - g. medical support may be available from the National Medical Services and Hospitals;
 - h. support from gender focal points/focal points for women system-wide;
 - i. others as appropriate for BtH;
- iv. The support listed in this section will remain available for the duration that the target/victim/affected individual continues in service with BtH. Thereafter, the following continued support may remain available for persons who have left the service:
- a. Compensation for workplace-related injuries, where available, in accordance with an entity's policy.
- v. Where appropriate and available under BtH's policy, the support listed in this section on support to targets/victims/affected individuals is available to non-staff personnel who are witnesses of sexual harassment.

Right to be accompanied by a support person

- vi. The target/victim/affected individual has the right to be accompanied by a staff member or other third party per BtH's policy during the formal or informal processes, provided such person is reasonably available to provide support to the target/victim/affected individual. Support may include emotional support but may not extend to legal representation or legal advocacy. Such support shall be subject to BtH's policy during any formal process.
 - a. The third-party should be chosen by the target/victim/affected individual. This could include a victim's a colleague, a family member or a friend.
 - b. BtH may provide reasonable objection, during any stage of the process, to a particular individual being present if it has reason to believe that their presence would jeopardise the process. In such cases, the target/victim/affected individual of SEA-H may choose an alternative individual to accompany them.
- vii. Third-party individuals should fully familiarise themselves with this current policy. They should always act in the best interests of the target/victim/affected individual.
- viii. The third-party individual shall immediately disclose any conflict of interest to HR Manager.
 - a. The third-party individual should not be a witness (direct or corroborative) to the

sexual harassment allegation – this would amount to a conflict of interest.

- ix. The third-party individual should keep information relating to, or arising out of, the allegation of SEA-H act confidential except as may be appropriately disclosed during an investigation or in compliance with any required disclosure to ethics or medical offices.

Work Performance

- x. When BtH becomes aware that a person is a target/victim/affected individual, it has an obligation to check if the individual's work performance or conduct and personal wellbeing has been impacted. The entity will support the colleagues and collaborate with them to address the issues affected, including by being mindful of the applicable circumstances in performance reviews but subject to the need to take appropriate management action.
- xi. Accommodations which may be considered to respond to related work performance issues include:
 - a. new work plan for the target/victim/affected individual,
 - b. provide leave and other working arrangements,
- xii. Confidentiality must be given when communicating accommodations to supervisors or colleagues, as appropriate.

Interim measures

- xiii. The entity recognises that interim measures may be required to support the target/victim/affected individual to ensure the integrity of the investigation and any evidence and to prevent the occurrence/repetition of prohibited conduct. Interim measures may also be necessary to protect BtH's interests, including the effective functioning of an office. Such measures may include:
 - a. measures to physically separate the alleged offender and the target/victim/affected individual
 - b. reassignment of either the alleged offender or the target/victim/affected individual with the consent of the alleged offender or target/victim/affected individual,
 - c. the consideration of special leave for either the alleged offender or the target/victim/affected individual,
 - d. temporary changes in reporting lines,
 - e. the alleged offender being placed on administrative leave or
 - f. any other appropriate measure or combination of measures to the extent consistent with an entity's policies and practices.

Post-investigation review

- xiv. Once any investigation has been completed and a decision taken on the outcome, appropriate measures shall be taken by responsible directorate / office in BtH to keep the situation under review. These measures may include, but are not limited to, the following:
 - a. Monitoring the status of the target/victim/affected individual of SEA-H act, the offender and the work unit(s) concerned at regular intervals to ensure that no party is retaliated due to the investigation, its findings or the outcome. Where retaliation is detected, HR and the Senior Management team shall be promptly notified, with specific attention given to performance evaluation;

- b. Ensuring that any administrative or disciplinary measures taken due to the fact-finding investigation have been duly implemented.

11. Protection against retaliation

- i. Protection from retaliation available to a person formally reporting possible SEA-H act shall be by this policy, irrespective of the outcome of the report of the SEA-H act.
- ii. Anyone formally reporting SEA-H act should be informed about their rights under the current policy, as applicable.
- iii. BtH will, to the extent provided by an entity's policies and practices, inform the HR Office acting as Ethics Office of any report of sexual harassment received that could be identified as posing a retaliation risk with the consent of the person who made the report.
- iv. Any form of retaliation will entail disciplinary sanctions. Managerial, administrative and disciplinary measures consistent with each entity's policies shall be pursued.

12. Implementation

BtH is accountable for ensuring the implementation of this policy on an ongoing basis, including by working with key stakeholders and pursuing solutions to ensure financial resources are available and allocated to support affected individuals, ensure quality investigation and timely outcomes, collect data, monitor the efficacy of the policy and undertake prevention efforts. BtH HR Manager is responsible for this policy. The designated person will provide an annual report to the HR acting as Ethics Office and communicate the results to staff (ensuring personal and identifying information remains confidential).

13. Alignment with Other Policies

This SEA-H policy works with BtH's HR Policy that is on professional conduct, workplace ethics, and nondiscrimination, to ensure a holistic approach to maintaining a safe and respectful work environment.

14. Review and Updates

This policy will be reviewed periodically, with any revisions identified on an as-needed basis, but minimally every three years, taking into account learnings from monitoring the policy and any changes in the structures, complementary policies, and context of HR that would impact its implementation. This way, the policy adapts to new legal and ethical standards and ensure it remains effective and aligned with BtH's best practices and values.

15. Commitment to Safeguarding

- i. BtH is committed to safeguarding the rights and dignity of all individuals associated with its operations. We strive to create an environment where everyone feels respected, valued, and safe from harm.
- ii. By expanding the policy to include these additional elements, BtH will ensure that it complies with and strives to exceed EU standards in safeguarding and promoting dignity at work. This comprehensive approach will help foster a culture of openness, safety, and respect across the organisation.

