

# PREVENTION OF SEXUAL EXPLOITATION AND ABUSE (STAFF AND REPRESENTATIVES) POLICY

## OBJECTIVE/BACKGROUND

Canadian Foodgrains Bank (“Foodgrains Bank”) is committed to preventing sexual abuse and exploitation by staff, volunteers, directors, and others representing the Foodgrains Bank from time to time. This policy outlines this commitment and establishes procedures for responding to complaints of sexual exploitation and abuse by Foodgrains Bank staff and representatives.

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## SCOPE

This policy applies to all Foodgrains Bank staff, both paid and voluntary, as well as to consultants and board directors when they are engaged in activities on behalf of or representing the Foodgrains Bank. It also applies to other individuals who may from time to time be asked to represent the Foodgrains Bank, when they are acting in that capacity.

This policy applies to people working on behalf of or representing the Foodgrains Bank in any country regardless of applicable laws in that country, except to the extent that the obligations conflict with a law in any country, and to any situation where power imbalances make people vulnerable to sexual exploitation and abuse.

Foodgrains Bank strives to be an organization where an individual’s self-worth and dignity are respected and affirmed. Consequently, this policy may be more stringent than applicable legislation. This is intentional. Conduct may be unacceptable, even if it is not illegal.

This policy is a partner to the Foodgrains Bank’s *Harassment* and *Professional Standards* policies. Under separate policy, the Foodgrains Bank addresses the prevention from sexual exploitation and abuse by people associated with members and partners implementing programs funded by the Foodgrains Bank.

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## DEFINITIONS

### Sexual Exploitation

Sexual exploitation means any actual or attempted abuse of a person in 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.

### Sexual Abuse

Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

### Trauma-Informed

Trauma informed service involves understanding, anticipating, and responding to issues, expectations, and special needs that are often present in survivors of trauma. This includes reducing the risk of re-traumatization.

*(Definitions taken from [United Nations Secretary General's Bulletin: Special measures for protection from sexual exploitation and sexual abuse](#).)*

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## POLICY

1. The Foodgrains Bank has zero tolerance for any incidents of sexual exploitation or abuse by anyone working for or representing the Foodgrains Bank.
2. Foodgrains Bank commits to a trauma-informed approach in responding to allegations or complaints of sexual exploitation and abuse.
3. Senior managers must take steps to ensure that this policy is upheld by all staff and be proactive in seeking to ensure as far as is reasonably practicable that anyone with whom the Foodgrains Bank interacts is protected from sexual exploitation and abuse.
4. Foodgrains Bank staff and representatives are expected to be vigilant and to not engage in any conduct that could suggest or imply that a sexual act might be demanded as a condition of employment, to receive funding, or for provision of any services.
5. Survivors of sexual exploitation or abuse at the hands of a Foodgrains Bank staff or representative, or of attempts at same, are encouraged to report their experience to a Foodgrains Bank senior manager, the executive director, or other trusted person or organization.
6. All reports of sexual exploitation or abuse, or attempts at same, will be treated as confidential to the extent possible. Safety and dignity of the survivor will be of paramount importance in all investigation and resolution activities.
7. Observed, known or suspected incidents of or attempts at sexual exploitation or abuse by staff or anyone representing the Foodgrains Bank must immediately be reported to a senior manager or the executive director.

A senior manager, receiving a report of sexual exploitation or abuse or attempts at same by staff or anyone representing the Foodgrains Bank, must immediately inform the executive director of the report or incident.

The executive director, human resources director, or their designate, must take action as necessary to:

- 7.1. ensure the physical, psychological, emotional, and/or employment safety of the alleged victim of exploitation or abuse as well as of the person reporting the exploitation or abuse,
- 7.2. ensure that the alleged perpetrator is removed from a situation where further victimization could occur,
- 7.3. initiate an investigation into the alleged incident or pattern of behaviour, being sensitive to the potential for retraumatization, in accordance with the procedures set out in the harassment policy, and

7.4. inform government authorities as required by law, and where possible, ensuring that such a report is approved by the victim and will not perpetuate further victimization.

8. Complaints of sexual exploitation or abuse or attempts at same by the executive director should be made to the director of human resources or other trusted senior staff.

If the executive director is implicated in a complaint of sexual exploitation or abuse, the chair of the Human Resources and Compensation Committee (the “Committee”) must be informed and must approve any proposed investigation and resolution actions.

9. Foodgrains Bank will ensure that its staff, board directors, and anyone representing the Foodgrains Bank knows and understands the organizational expectations as outlined in this policy and the harassment policy. All staff and representatives must be familiar with this policy and the harassment policy, and the related procedures for how to respond to observed or reported incidents or attempts at sexual exploitation or abuse.

10. Foodgrains Bank will implement training regarding this policy and the prevention mechanisms in place to assist in the prevention of abusive or exploitative behaviour by staff or anyone representing the Foodgrains Bank.

11. Foodgrains Bank will alert the Committee to any reported incidents of sexual exploitation or abuse as they are received. Respecting the confidentiality of the people involved, these reports will not necessarily include names but will outline for the Committee the nature of the complaint and any investigation and resolution plans in accordance with the procedures set out in the harassment policy.

The executive director will annually report to the Board of Directors on the number of complaints of sexual exploitation and abuse received by the organization, actions taken, and outcomes, respecting the confidentiality of the people involved to the extent possible.

## PROCEDURES