

IUCN NL POLICY ON PROTECTION FROM SEXUAL EXPLOITATION, ABUSE AND HARASSMENT

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1. Policy aim

IUCN NL is committed to a safe, respectful workplace free from discrimination, harassment, and sexual and gender-based violence (SGBV). We uphold a zero-tolerance policy for sexual harassment and promptly investigate all allegations. SEAH undermines human dignity and creates hostile environments that hinder our mission.

We protect victims and whistleblowers, ensure confidentiality, and take strong action against perpetrators, including dismissal. Extreme cases such as rape or violence will be reported to relevant authorities. IUCN NL also works to build awareness and capacity among staff and partners to address structural causes to prevent and eliminate SEAH in all contexts.

2. Purpose and Scope of policy

This policy will explain the steps IUCN NL will take to provide a safe environment, free from sexual harassment and violence. We recognise the need to challenge any tacit or explicit acceptance of sexual harassment or sexual violence to prevent escalation. We also undertake to improve the understanding of sexual harassment across our community to prevent it from occurring, as well as providing a supportive culture, which encourages reporting of incidents and ensures that they are dealt with sensitively and appropriately. This policy aims to ensure that all parties are treated with dignity and respect and provided with appropriate support. This Policy complements the general principles established in IUCN NLs Code of Conduct, Complaints procedure and dispute resolution procedure.

IUCN NL is committed to a zero-tolerance approach to SEAH. Therefore, this policy aims to:

- Prevent SEAH in our work;
- Provide clear guidance for staff, consultants, partners and their work in the communities, and contractors;
- Provide a roadmap how to report and to whom in case of an incident;
- Ensure a safe, respectful, and inclusive environment for everyone we work with.

This policy applies to:

- All IUCN NL employees, interns, volunteers, consultants, and board members.
- Implementing partners, suppliers, and contractors engaged in IUCN NL projects.

3. Roles & Terms

- Confidential advisor: the person(s) appointed for this purpose to whom the person wishing to report or complain about unethical and/or undesirable behaviour can turn for guidance and support
- Integrity committee: internal committee to which the confidential advisor can refer a report or complaint for further handling, with the consent of the person making the report or complaint
- Director: the managing director of IUCN NL
- 'IUCN NL-related Activity' means any activity which is financed, administered, or supported by IUCN NL, either with its own resources or those of others;
- 'IUCN NL staff' means those persons under contract of employment with IUCN NL;
- Line manager (P-verantwoordelijke): the person who has hierarchical responsibility for one or more employees

- 'Partners' means implementing partners, consultants or any other type of partners involved in IUCN NL-related activities;
- Victim'/ survivor means the person who is, or has been, sexually exploited, abused, or harassed;
- A perpetrator can be anyone, regardless of their gender, and the sexual harassment and/or violence can be targeted towards any gender. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed;
- Supervisory Board: supervisory body for the policy and conduct of the management
- 'Consent' is providing permission for something to happen or agreement to do something with a full understanding of the facts and without coercion. In cases of sexual activity, consent cannot be presumed but must be explicitly given, verbally or non-verbally and must be above the legal age. Consent cannot be deemed to have been given if it is provided under pressure or in situations where someone is not capable of providing it. Consent can be withdrawn at any time;
- 'PSEAH' means protection against Sexual Exploitation, Sexual Abuse, and Sexual Harassment;
- 'SEAH' means Sexual Exploitation, Sexual Abuse, and Sexual Harassment;
- Sexual Exploitation: Abuse of a position of vulnerability, differential power, or trust for sexual purposes, including profiting monetarily, socially, or politically;
- Sexual Abuse: Actual or threatened physical intrusion of a sexual nature, by force or under unequal conditions;
- Sexual Harassment: Sexual harassment is an unwelcome conduct of sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient, such as for example sexually charged jokes;

4. Guiding Principles

- IUCN NL will not tolerate any form of Sexual Exploitation, Sexual Abuse, or Sexual Harassment;
- IUCN NL employs a survivor-centered policy: safety, dignity, & confidentiality of survivors come first;
- IUCN NL has a Do No Harm principle: all actions must minimize risk and avoid further harm;
- Non-Discrimination: Equal protection regardless of gender, age, ethnicity, disability, or sexual orientation;
- Accountability: Leadership and all staff share responsibility for compliance;
- IUCN NL will take all available measures to prevent, mitigate, investigate and remedy SEAH in IUCN NL-related activities. IUCN NL will actively promote equality in order to provide a collegiate, lawful and harmonious working and learning environment;

- IUCN NL will raise awareness of PSEAH among IUCN NL individuals and its implementing partners, consultants or any other type of partners (“partners”) involved in IUCN NL-related activities. IUCN NL will play a leading role in organizing such awareness raising.

Examples

Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault and (attempted) rape
- The use of job-related threats or rewards to solicit sexual favors, such as threatening to have someone fired if they tell anyone about the sexual harassment etc.

Verbal conduct

- Comments on a worker’s appearance, age, private life, etc. For example to comment on someone’s appearance when they are in the middle of a presentation.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the assumed gender of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email) without the consent of the receiver, online harassment or stalking

Non-verbal conduct

- Display of sexually explicit or suggestive material
- Sexually suggestive gestures
- Whistling
- Leering

5. Partner organisations

IUCN NL will take steps to encourage its partners involved in IUCN NL-related activities, to abide by this policy or adopt policies and procedures that are consistent with this policy, with the purpose of safeguarding against SEAH in IUCN NL-related activities.

- Partners sign a code of conduct as stated in the Partnership Agreement, Standard provisions and or Service agreement
- Partners must have or work towards having policies and/or procedures designed to ensure prevention to those set out in this SEAH Policy.
- Partners must have or work towards having policies and/or procedures designed to ensure prevention, detection, investigation, remedial action and, where appropriate, sanctions and reports to state agencies with authority over criminal prosecution over SEAH offences in IUCN NL-related activities. This includes protection against retaliation for actual and apparent victims of SEAH, witnesses of and whistleblowers with respect to SEAH; and procedures to

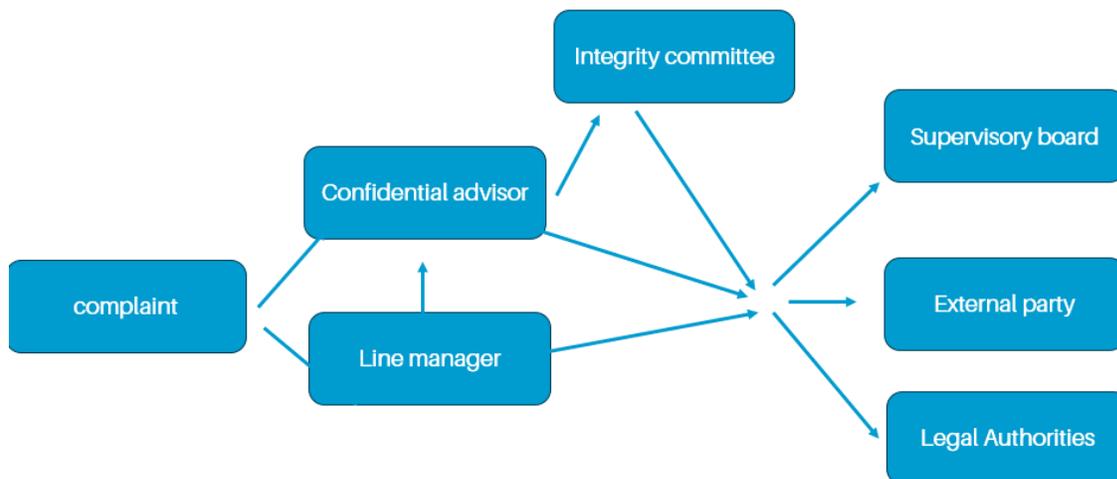
identify risks related to SEAH and to prevent, report, investigate and remedy SEAH in IUCN NL-related activities; IUCN NL will monitor the steps taken to improve policies

- IUCN NL will reserve its right to terminate a contractual relationship with a partner in case of breach of those policies and procedures. IUCN NL will apply sanctions, disciplinary, or other remedial measures if this policy is violated.

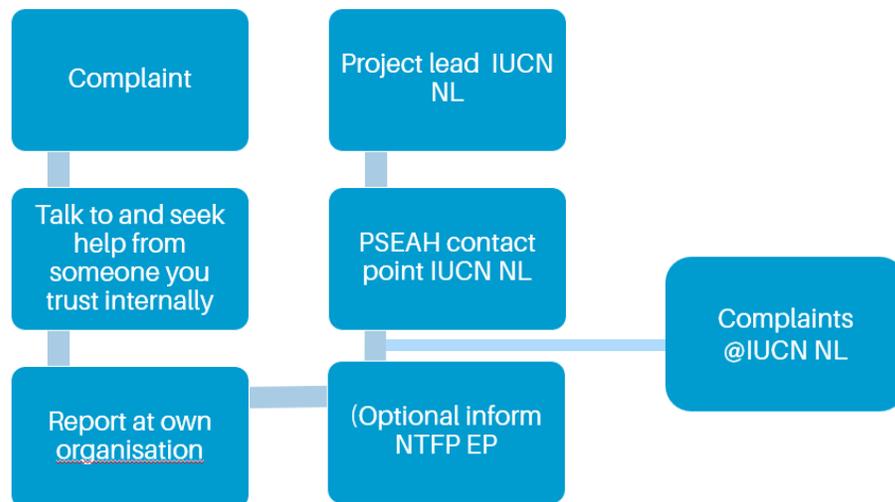
6. Complaints procedures

- Anyone who is subject to SEAH should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. IUCN NL recognizes that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the aggrieved person to inform the alleged harasser.
- Any person who witnesses any form of sexual harassment or abuse is invited to report this violation. Any person to whom the Code of Conduct applies who witnesses any form of sexual harassment or abuse is required to report this at the earliest possible moment.
- Cases of sexual harassment and abuse can be reported to the responsible line manager, or the internal or external confidentiality advisor.
- If an incident happens in a project, IUCN NL staff can report to the project lead, the MT or director.
- Contacts of IUCN NLs internal and external confidentiality advisor can be found on the [website](#) of IUCN NL.
- If the reporter (with the support of the line manager or confidential advisor) cannot reach a solution, the reporter can, in consultation with the confidential advisor, refer the report to the Intergity Committee. The reporter can also decide, in consultation with the confidential counselor, to directly involve the supervisory board, legal authority, or external parties to handle the report further.
- In case of a criminal offence (eg (attempted) rape) the victim/survivor will be supported by the confidential advisor to report to the police.
- The intergity committee, confidential advisors etc have received dedicated training.

Roadmap for IUCN NL staff:



Roadmap for partners:



STEPS:

When a designated person receives a complaint of sexual harassment, they will:

- immediately record the dates, times and facts of the incident(s), see annex A for incident reporting log format;
- ascertain the views of the reporting person to what outcome they want;
- ensure that the reporting person understands the organisation's procedures for dealing with the complaint;
- discuss and agree on the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the reporting person from pursuing a formal complaint if they are not satisfied with the outcome; See steps above in the roadmap or the [complaint procedure](#);
- keep a confidential record of all discussions;
- respect the choice of the reporting person;
- ensure that the reporting person knows that they can lodge the complaint outside of the organisation through the relevant country/legal framework;
- treat the reporting person with utter most respect throughout the procedure, IUCN NL will not doubt the credibility of the person reporting the sexual harassment, we assume reports are made in good faith;

IUCN NL recognises that because sexual harassment often occurs in unequal relationships within the workplace, or between partners and communities, many often feel that they cannot come forward and report sexual harassment and violence. IUCN NL understands the need to support these persons in stepping forwards and making a complaint.

A. Informal complaints mechanism

If the person wishes to deal with the matter informally, the designated IUCN NL person or Integrity Committee or mediator will:

- give an opportunity to the alleged harasser to respond to the complaint;
- ensure that the alleged harasser understands the complaints mechanism;
- facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant, or refer the matter to a designated mediator to resolve the matter;
- ensure that a confidential record is kept of what happens;
- follow up after the outcome of the complaints mechanism to ensure that the behaviour has stopped;
- ensure that the above is done speedily and within 7 days of the complaint being made.

B. Formal complaints mechanism

If the reporting person wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome, the formal complaint mechanism should be used to resolve the matter. The designated person who initially received the complaint will refer the matter to an external investigator.

The person carrying out the investigation will:

- interview the reporting person and the alleged harasser separately;
- interview other relevant third parties separately;
- produce a report detailing the investigations, findings and any recommendations;
- if the harassment took place, consult the reporting person and decide what the appropriate remedy for them is (i.e.- an apology, a change to working arrangements, a promotion if they were demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal);
- follow up to ensure that the recommendations are implemented, that the behaviour has stopped, and that the reporting person is satisfied with the outcome;
- if it cannot determine that the harassment took place, the reporting person may still make recommendations to ensure proper functioning of the workplace;
- keep a record of all actions taken;
- ensure that the all records concerning the matter are kept confidential;
- ensure that the process is done as quickly as possible and in any event within 14 days of the complaint being made;

C. Outside complaints mechanisms

A person who has been subject to SEAH can also make a complaint outside of the IUCN NL office and related partner offices. They can do so through the following mechanisms depending on the respective country's legal framework. We encourage the reporting person to take legal steps against alleged perpetrators and IUCN NL and or partner will stand side by side the reporting person to give support. IUCN NL puts consent of the reporting person first and will never contact official authorities without the reporter's consent.

7. Sanctions and disciplinary measures

For IUCN NL employees, interns, volunteers, consultants, and board members who have been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- verbal or written warning;
- adverse performance evaluation;

- suspension;
- dismissal;
- reporting to public authorities;

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser and or reporting to the authorities.

For IUCN NL partners we will reserve the right to terminate a contractual relationship in case of breach of SEAH policies and procedures. Partners should not directly or indirectly condone, encourage or tolerate participation or engagement in SEAH. Partners are obligated to report SEAH concerns / allegations *without delay*, cooperate in investigations and ensure SEAH compliance throughout project activities. See Partnership agreement.

8. Protection and Remedies

- Whistleblower protections: Anyone (survivor or other person) who reports, attempts to report, or cooperates in an SEAH investigation is entitled to anonymity, confidentiality, and protection from retaliation under IUCN NL policies.
- Survivor support: Survivors of SEAH in IUCN NL-related activities may request guidance and support, including interim medical relief or other emergency services.
- Misconduct & consequences: SEAH acts or retaliation by IUCN NL staff or partners constitute misconduct or breach of contract and will lead to disciplinary or remedial measures.
- False reports: all complaints will be handled with the utmost seriousness and the committee will never advise a complainant to withdraw a complaint. However, individuals or entities making false or malicious reports may face sanctions or disciplinary action per IUCN NL policies and contractual agreements. The person against whom the complaint is filed will be rehabilitated
- Protection & remedies: When SEAH or retaliation is confirmed, IUCN NL will work with authorities and take reasonable measures to protect victims and ensure remedies are implemented promptly.

9. Prevention Measures

IUCN NL will ensure that this policy is fully understood and will organize (refresher) trainings for employees as well as partners once a year or when deemed relevant or needed. All new employees, interns and volunteers are actively informed on the content of this policy as part of their introduction into the organization. Reference is made to this policy in all employment contracts. Contracts and Memoranda of Understanding with partners will include the requirement for partners to adhere to the zero tolerance of the Policy to Prevent and Address Sexual Harassment and Abuse of IUCN NL, and to ensure necessary procedures in their own organizations. For outreach and awareness raising, where relevant and appropriate, IUCN NL will organize capacity building to support network partners including those where there is no legal/ contractual relationship.

Safer Recruitment

IUCN NL will ensure, as soon as practicable following the adoption of this Policy, that its recruitment, procurement, employment, or any other onboarding processes include SEAH checks. SEAH clauses will be added in job descriptions, new staff will sign the code of conduct.

Awareness and Training

IUCN NL ensures mandatory SEAH induction for all staff and partners and annual refresher sessions will take place. Reporting channels in offices and partner sites are in display. At the start of a new programme all related partners will receive a dedicated SEAH training.

Partners

IUCN NL encourages its partners to adopt similar policies on sexual harassment. IUCN NL takes the responsibility to share its experience to prevent sexual harassment and reveal underlying power structures that are the breeding ground for misconduct and abuse. Within our international projects we share best practices and demand from our partners to have sexual harassment policies in place or are actively working on getting these policies, so they can provide community sensitization on expected standards of behaviour of staff and how report complaints and provide feedback on services; appropriate and proportional to the project activities.

Monitoring and evaluation

IUCN NL recognizes the importance of monitoring our sexual harassment policy. IUCN NL actively identifies, assesses and monitors safeguarding risks in the project risk framework and will do so in a needs based frequency. An incidents report is developed annually by the internal and external confidentiality advisor and shared with the director. All complaints and type of complaints are registered. As a result of this report, the organization will evaluate the effectiveness of this policy and make any changes needed. IUCN NL carries out an annual review of policy and incident trends. SEAH compliance is integrated into partner agreements and audits. Lessons learned are shared internally for continuous improvement.

10. Donor reporting

The relevant donor will be timely informed of any complaint. The reporter will remain confidential. Any reputational risks, mitigating measures and outcomes will be shared.

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IUCN NL

Annex 1: SEAH Incident Log Reporting Form

- Name of Reporter:
- Date of Report:
- Contact Information:
- Type of incident:
- Details of Incident:
- Persons Involved:
- Location:
- Role reporter (staff member, community member etc):
- Reporting channel used:
- Action taken so far:
- Reported to (CA, MT, donor etc):
- Current status:
- Follow up required:
- Other comments:

Annex 2: SEAH Risk Assessment Checklist

- Does the project involve direct contact with vulnerable groups?
- Are staff trained on SEAH prevention?
- Are reporting mechanisms in place and accessible?
- Are partner organizations compliant with SEAH standards?
- Are mitigation measures documented?