



NFD CHETNA
For Women Young people Children
Centre for Health, Education, Training and Nutrition Awareness

Nehru Foundation for Development - Centre for Health Education Training and Nutrition Awareness (NFD-CHETNA)

Protection from Sexual Exploitation and Abuse (PSEA)

FRAMEWORK & POLICY



Signature

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CHETNA is an activity of the Nehru Foundation for Development, Ahmedabad, a registered Public Charitable Trust under the Bombay Public Trust Act 1950
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Nehru Foundation for Development
Centre for Health Education Training and
Nutrition Awareness (NFD CHETNA)

**Protection from Sexual Exploitation and Abuse (PSEA)
FRAMEWORK & POLICY**

October 2026

Purpose of the Policy	To promulgate a policy of zero tolerance for sexual exploitation and abuse (SEA) for all NFD CHETNA employees and related personnel and ensure that roles, responsibilities and expected standards of conduct in relation to SEA are known within NFD CHETNA. To Create and maintain a safe environment, free from SEA, by taking appropriate measures for this purpose, internally and in the communities where NFD CHETNA operates, through robust prevention and response work.
Target Audience	All NFD CHETNA employees and related personnel.
Effective Date	October 2026
Revision Date	October 2029

Please note: The legal name of the organization is Nehru Foundation for Development Center for Health Education Training and Nutrition Awareness Ahmedabad. In the document henceforth, we are referring to the organization as “NFD CHETNA”



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1. Scope & Purpose

NFD CHETNA works with a range of partners, community groups, schools, colleges, and individuals. It organizes training, conducts camps, runs courses, has consultations, implements projects engaging directly with the public, beneficiaries of projects, and stakeholder groups directly and through intermediaries. NFD CHETNA works across India and globally.

NFD CHETNA has zero tolerance for sexual exploitation and abuse. NFD CHETNA will not tolerate that its staff, associates, partners or any other representatives associated with the delivery of its work to engage in any form of sexual exploitation and abuse. Vulnerable adults, women and children are particularly at risk of sexual exploitation and abuse. NFD CHETNA is committed to protecting all communities that the organization works with from sexual exploitation and abuse at all times. Please see Definitions for a full outline of who is included in the community.

The purpose of the Protection from Sexual Exploitation and Abuse (PSEA) Framework, including the policy, procedures and resources is to establish an outline of the importance of the framework and clear procedures. The PSEA Framework also affirms NFD CHETNA's commitment to the [United Nations Secretary General's Bulletin on Special Measures for protection from sexual exploitation and abuse \(ST/SGB/2003/13\)](#).

The policy ensures that all staff, associates and partners of NFD CHETNA are aware of their role and responsibilities in keeping communities and stakeholders safe from any form of sexual exploitation or abuse. The policy clarifies definitions and responsibilities regarding prohibited behavior and the associated PSEA procedures outline the reporting and investigation processes.

The Management, employees, partners and all associated with NFD CHETNA are expected to uphold the highest standards of personal and professional conduct at all times to protect beneficiaries of assistance.

NFD CHETNA employees and related personnel are required to behave irreproachably with the project beneficiaries or members of the community, using particular care with the most vulnerable classes: minors, women, the elderly and social outcasts. NFD CHETNA commits to Create a zero-tolerance organizational culture against complacency and impunity. NFD CHETNA Management, among the others, are expected to create and maintain an environment that prevents sexual exploitation and abuse. NFD CHETNA management staff must be familiar with and enforce this policy, being proactive in overseeing their team. Through the Protection from Sexual Exploitation and Abuse Policy, NFD CHETNA clearly expresses its determination to prevent and combat sexual exploitation and abuse of beneficiaries and members of the community by NFD CHETNA employees and all related personnel.

The PSEA policy of NFD CHETNA policy sets minimum standards to be followed to protect beneficiaries and members of the community from sexual exploitation and abuse.



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The policy applies to NFD CHETNA employees and related personnel included in the following categories:

- Governing Council;
- All the employees and collaborators in all NFD CHETNA structures and projects in India and abroad;
- Non NFD CHETNA entities and their employees and individuals who have entered into partnership, sub-grant or sub-recipients of agreement with NFD CHETNA, committees, associations of any sort — including their members and staff — supported, financially or otherwise, by NFD CHETNA in India and abroad;
- Consultants and other freelance persons who act on behalf of NFD CHETNA on the basis of service contracts (understood as consultants and providers of intellectual services);
- All persons acting voluntarily on behalf of NFD CHETNA
- Suppliers of any sort of goods, services, or works, including current and potential suppliers.
- All the other people not included in the above-mentioned categories who have signed a contract with NFD CHETNA

This policy sets out NFD CHETNA 's approach to preventing and addressing sexual harassment and sexual exploitation and abuse.

This includes:

- NFD CHETNA commitments to prevent SEA and to ensure effective action is taken when problems occur;
- Principles upon which NFD CHETNA will base its decision making and actions;
- Minimum standards and expectations of all those who work for and on behalf of NFD CHETNA

The principles set forth in this policy apply all times, during and outside the office hours and during the periods of leave, with no exceptions. This policy is to be read with other policies set in place on preventing sexual harassment such as the NFD CHETNA Child Protection Policy, Prevention of Sexual Harassment at the Workplace Policy, Code of Conduct and Non-discrimination Policy.

2. Policy Statement

NFD CHETNA has a zero-tolerance policy towards sexual harassment, exploitation, and abuse. At NFD CHETNA, we believe all people have a right to live their lives free from sexual violence and any abuse of power regardless of age, gender, sexuality, sexual orientation, disability, religion or ethnic origin. NFD CHETNA will not tolerate its employees, volunteers, consultants, partners or any other representative associated with the delivery of its work carrying out any form of sexual harassment, sexual exploitation or sexual abuse.



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NFD CHETNA commits to spread awareness on the issue, define such act as misconduct, commits for supporting survivors, improving safeguarding capacity, reporting, investigating, responding to, and preventing sexual harassment and sexual exploitation and abuse.

SEA is treated as a violation of NFD CHETNA Code of Conduct and service rules.

NFD CHETNA takes this policy very seriously and the mandate prohibiting any form of sexual exploitation and abuse and harassment comes from the core culture of NFD CHETNA management.

NFD CHETNA does not tolerate any form of sexual exploitation and abuse, bullying and a range of non-sexual abuse of power perpetrated by NFD CHETNA employee and related personnel against any individual regardless of age, gender, sexuality, disability, religion or ethnic origin.

The PSEA policy applies to all staff, associates, and partners who must comply with its requirements and understand the sanctions that may be applied for breaches of the policy. This commitment will be evidenced through signing the policy and the NFD CHETNA Code of Conduct. Training in this policy is mandatory for all staff, associates, and partners of NFD CHETNA

NFD CHETNA management will be ultimately accountable for this policy and for its implementation. It is the responsibility of all representatives of NFD CHETNA to raise any concerns and complaints regarding sexual exploitation and abuse and harassment. NFD CHETNA takes all concerns and complaints seriously and will initiate a comprehensive investigation of complaints that are in violation of this policy and take disciplinary and possibly legal action as warranted.

3. PSEA Guiding Principles

- **Zero Tolerance:** NFD CHETNA maintains a zero-tolerance stance against sexual exploitation and abuse in all forms. Sexual exploitation and abuse by NFD CHETNA employee and related personnel constitute acts of gross misconduct and are therefore grounds for disciplinary actions and/or termination of employment contract within the applicable and current regulations;
- **No Sex with Children:** Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense and in no way shall ignorance of the age of the person be accepted as a justification.
- **The Children Safeguarding Policy** further sets the principles and the operationalizing procedures and guidelines for guaranteeing safeguarding of children in all domains of NFD CHETNA activities.
- Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to beneficiaries;
- **Mandatory Reporting:** It is the responsibility of NFD CHETNA employees and



related personnel to report concerns regarding sexual abuse by a fellow worker, whether the individual works for NFD CHETNA or for other organization, partners, suppliers or other related stakeholders, through the means and tools available within the Organization. All NFD CHETNA staff members, whatever their levels, are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of the Code of conduct.

- **Taking Action:** NFD CHETNA will take appropriate disciplinary action and legal action reporting for criminal prosecution to the competent authority in accordance with the applicable law
- **Empowerment and Gender Equality:** We believe in empowering marginalized communities, particularly women, children and other vulnerable individuals, to ensure their rights and dignity are respected and protected.
- **Safeguarding:** NFD CHETNA is committed to all community members as outlined in the definitions as having the right to safeguarding and protection from sexual exploitation and abuse irrespective of ability, ethnicity, faith, caste, age, religion, gender, sexuality, and culture. A key principle within this is that all processes are survivor led. NFD CHETNA commits to survivors leading the complaint process where it is possible and appropriate to do so.
- **Collective Responsibility:** For the PSEA policies and practices to be effective in reducing the risks to beneficiaries and communities, all at NFD CHETNA must share the responsibility for implementation and improvement. As such, a failure at one level of the organization constitutes a failure at all levels of the organization.
- **Accountability:** All staff, partners, and individuals associated with NFD CHETNA are held accountable for upholding the principles of this policy.
- **Confidentiality:** Reporting and investigation procedures prioritize confidentiality, protection, and support for survivors.

4. Integrating PSEA into NFD CHETNA 's work and taking Preventing Measures

- **Safer Recruitment:** In compliance with applicable laws, NFD CHETNA is committed to prevent perpetrators of SEA/H from being (re)hired or (re)deployed. Managers and Human Resource teams will ensure robust recruitment screening processes for all personnel, including employees, volunteers, consultants and other representatives. As part of this, all application forms, interviews and references must address Safeguarding and equality requirements and attitudes.
- **Partnership Agreements:** NFD CHETNA will ensure that, when engaging in partnerships, sub-grant or sub-recipient agreements, these agreements: (i) incorporate this Policy as an attachment; (ii) include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to abide by a Code of Conduct that is pursuant to the standards of this Policy; and (iii) expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against sexual exploitation and abuse and sexual harassment, to investigate and report allegations thereof, or to take



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corrective actions when SEA/H has occurred, shall constitute grounds for NFD CHETNA to terminate such agreements.

- **Mandatory training:** NFD CHETNA Employees and Related Personnel must receive as part of their induction trainings on PSEA and Safeguarding when they join NFD CHETNA, including a briefing on NFD CHETNA 's policies and values, the Code of Conduct, information about how to report concerns, and advice about where to seek further information about safeguarding and safer practices across the organization. Anyone working directly with beneficiaries on behalf of NFD CHETNA must receive additional training on how to receive complaints and handle them in a safe and confidential manner.
- **Beneficiary Accountability:** NFD CHETNA commits to promoting accountability towards our beneficiaries and the communities where we work by:
 - being transparent about NFD CHETNA programming, activities, and services beneficiaries are entitled to;
 - raising awareness about NFD CHETNA 's Code of Conduct, safeguarding policies, and reporting channels;
 - actively seeking feedback from communities on NFD CHETNA 's work, individual behaviors, and complaints; and
 - presenting feedback to communities on what changes have been made resulting from community feedback – ideally by a senior NFD CHETNA representative. The above steps should occur regularly throughout the lifecycle of the programme or activity.

5. Roles And Responsibilities

- a. **NFD CHETNA Employees and Related-Personnel:** Everyone who works on behalf of NFD CHETNA is required to report any suspicions or incidents of sexual exploitation or abuse of others). Failure to report to a relevant person suspicion of SEA relating to someone else is a breach of NFD CHETNA 's policy, and could lead to disciplinary action being taken against employees. NFD CHETNA Employees and Related Personnel have a responsibility to report any suspicion or concern of SEA. Any individual can raise a concern/complaint to NFD CHETNA about an incident they have experienced, witnessed, or heard about concerning an NFD CHETNA staff member or partner (suppliers, partners, contractor, etc.) without fear of retribution. NFD CHETNA Employees and Related Personnel must not investigate allegations or suspicions themselves.
- b. **Focal Points:** Provide support to prevent and respond to SEA/H alongside their substantive roles. Raising awareness and promoting best practices by receiving concerns, supporting survivors and reporting concerns in a confidential manner within their Affiliate channel.
- c. **NFD CHETNA Management:** Responsible for promoting awareness of this policy with people they manage and for supporting/developing systems that create and maintain a safe working environment. This also includes the responsibility for ensuring that all staff and Related Personnel receive regular PSEA



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trainings, with a particular emphasis on staff who are in direct contact with the people we serve. NFD CHETNA Management should prioritize PSEA awareness raising for themselves and their divisions, individual departments or teams, and provide budget lines for some activities.

6. Governance

The policy will be put into effect and enforced by NFD CHETNA and Secretarial & Legal Office will hold accountability for the same.

7. Internal Committee

The internal committee will be the same as constituted under the Prevention of Sexual Harassment at the Workplace Policy. Moreover, NFD CHETNA will be appointing Focal Point Persons at each location that they are working in. The names of the committee and the FPPs will be displayed and regularly circulated within the office. **The office holder/ regional head will be the focal point person for each location unless notified otherwise.**

They will be responsible for receiving and investigating any safeguarding complaints, including PSEA. The Internal Committees will be trained in all of the Safeguarding policies as well as reporting and investigations. The Internal Committee will also be provided with specialized psychological first aid training so that they are able to offer appropriate support as required.

8. Reporting and Response

- a. **Mandatory Reporting:** Mandatory reporting of SEA cases to the PSEA focal point person.
- b. **Confidential Reporting Mechanism:** NFD CHETNA provides multiple channels for reporting suspected incidents of sexual exploitation and abuse, ensuring confidentiality and protection for the survivor. This is through PSEA focal point persons and through the Internal Committee. Persons who report on behalf of someone else or are a witness will be required to sign a Non-disclosure Agreement.
- c. **Prompt Investigation:** All reported incidents are promptly and impartially investigated by the safeguarding committee, following a survivor-centered approach.
- d. **Support for Survivors:** Comprehensive support services are available for survivors, including medical, psychosocial, and legal assistance.
- e. **Disciplinary Action:** If allegations are substantiated, appropriate disciplinary action will be taken, which may include termination, legal action, and reporting to relevant authorities.
- f. **Receiving Complaints about External Organizations/Bodies:** Safeguarding



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complaints raised to NFD CHETNA about other organizations/bodies should be referred to the Committees set for the same, who will report cases to the relevant organizations involved where safe to do so, as well as where appropriate and safe to do so. NFD CHETNA will not investigate cases related to other organizations.

9. Confidentiality of Complaint

NFD CHETNA will protect the confidentiality of sexual exploitation and abuse allegations to the greatest extent possible in order to protect the integrity of the investigation and prevent embarrassment, further discrimination or harassment, or retaliation. Confidential or sensitive information obtained by any staff member during the course of an investigation shall not be disclosed to others unless required by law. Concerns of individuals regarding confidentiality of information provided by them will be handled as sensitively as possible, and information shall not unnecessarily be disclosed to others.

Any person who has knowledge of an SEA report or complaint must respect the sensitivity of the matter and the need to protect the identities, privacy and reputation of the alleged offender, complainant, reporter, alleged survivor and any witnesses. Report forms and all related information and documents will be kept in a strictly confidential manner in accordance with NFD CHETNA Code of Conduct. The obligation of confidentiality continues after the matter has been closed. Failure to respect such confidentiality may result in disciplinary measures. NFD CHETNA cannot guarantee, however, complete confidentiality, because the organization cannot conduct an effective investigation without revealing certain information to the alleged perpetrator and potential witnesses. NFD CHETNA will share information about allegations of sexual exploitation, abuse and harassment only with those who need to know about it. Records relating to sexual exploitation, abuse and harassment complaints will also be kept confidential on the same basis. Any disclosure on a need to know basis will be done with the full knowledge of those involved in the complaint.

10. Whistleblowing Policy

The NFD CHETNA Whistleblower policy will apply wherein if a NFD CHETNA staff/ consultant/ employee or any person employed by NFD CHETNA suspects or witnesses SEA, they may report the incident through the channels as outlined in the NFD CHETNA whistleblowing policy. However, confidentiality will have to be decided based on context of the case and given how the inquiry has to pro NFD CHETNA. The consequences of the complaint will also depend on this.

The process that will be followed:

- a. Complaint made to PSEA focal point person/ Internal Committee by whistleblower
- b. Immediate victim/ survivor assistance if needed. This will be assessed by the committee.
- c. Provide appropriate protections and support to those who disclose wrongdoing, supported by a culture of trust and openness.
- d. Treat all disclosure seriously and fairly and investigate all complaints as appropriate.



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- e. Take appropriate action where claims of wrongdoing are substantiated.
- f. Tolerate no retaliation towards those who report wrongdoing or to anyone who cooperates in an investigation
- g. Take appropriate action in the event of disclosures not made in good faith.
- h. Investigation procedures as outlined in the PSEA and POSH policy will be followed.

11. Retaliation Prohibited

NFD CHETNA maintains a zero-tolerance policy for retaliation against anyone for reporting sexual exploitation or abuse, assisting in making a complaint, or participating in an investigation. Any staff, associate, or partner who makes a good-faith complaint of sexual exploitation or abuse, assists, testifies, or participates in any investigation or who reasonably opposes such conduct in the workplace will not be adversely affected in the terms and conditions of his or her employment and will not be discriminated against or discharged for engaging in such activity. Retaliation not only affects the recipient, but also can spread rapidly throughout NFD CHETNA. It destroys faith in NFD CHETNA 's leadership and can damage employee morale.

Complaints of retaliation will be promptly investigated. If retaliation is substantiated, appropriate disciplinary action, including possible dismissal, will be taken. In addition, the security of the complainant, reporter, survivor, alleged offender and witnesses is of great importance and shall be given the fullest consideration throughout the related SEA procedures. NFD CHETNA staff members, including the alleged offender, shall not, at any time, retaliate against any person who has made a complaint about or reported an SEA allegation, concern or suspicion, or assisted in providing information or participated in an investigation about SEA. Such retaliation may result in disciplinary measures. NFD CHETNA staff members, including supervisors and PSEA focal points, shall report any SEA allegations, concerns or suspicions of retaliation.

12. Partnerships and Collaboration

- a. **PSEA Integration:** NFD CHETNA includes PSEA clauses in agreements/ contracts with partners and ensures they are aware of and committed to adhering to PSEA principles and NFD CHETNA 's PSEA policy.
- b. **Monitoring and Evaluation:** Regular monitoring and evaluation mechanisms are implemented to assess the effectiveness of the PSEA policy and make necessary improvements.
- c. **Complaints about NFD CHETNA 's Partners:** Where NFD CHETNA receives a complaint about a partner organization, NFD CHETNA will expect the partner to respond safely, quickly and appropriately. NFD CHETNA will assist the partner to ascertain its reporting obligations. Where appropriate, NFD CHETNA will work with the partner to address the issue through an appropriate independent investigation. If the outcome is that abuse has occurred, ongoing work with the partner cannot involve the individual(s) concerned. If there is reason to believe that an allegation of abuse has been dealt with inappropriately by a partner, then they risk withdrawal of funding or ending the relationship (including networks and consortia).



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13. Communication and Transparency

It is NFD CHETNA's responsibility to ensure that all staff, associates and partners are aware and fully compliant with the PSEA policy.

- a. **Communication Strategy:** NFD CHETNA communicates its commitment to PSEA through internal and external channels, reinforcing the importance of preventing sexual exploitation and abuse.
- b. **Transparency:** Relevant information about reported incidents, actions taken, and lessons learned are shared while maintaining survivor confidentiality.

14. Consequences of Breach of Policy

Any staff, associate, or partner who is in violation of the PSEA policy will face disciplinary procedures, which may result in disciplinary action, termination of employment or contract and/or referral to the appropriate law enforcement agency or legal authority. The consequences will be the same as listed in the POSH and PSCVAP. Please refer to both of these policies.

15. Victim/ Survivor Assistance

NFD CHETNA is committed to ensuring that the victim receives all necessary protection and support, specifically in the following areas:

- a. Safety
- b. Medical assistance
- c. Psychosocial support
- d. Legal assistance
- e. Material assistance

NFD CHETNA has a list of contacts and services that can be referred to if needed that offers the victim onsite support through various entities operating in the area, which act as a protection "network." This is a list of referrals; they will not be vendors or contractors of NFD CHETNA. The concerned person will be referred to the concerned service and can avail it. NFD CHETNA will only be responsible in connecting the two parties.

Even in cases where, due to the victim's wishes or to ensure the person's protection, the case is not reported to the justice system, NFD CHETNA takes all necessary measures to assist the victim and provide social, health care, and psychological support.

16. Review and Improvement

This policy will be regularly reviewed and updated to align with evolving international standards and best practices in preventing sexual exploitation and abuse.

By adhering to this PSEA policy, NFD CHETNA aims to create a safe and inclusive environment that upholds the rights and dignity of all individuals, advancing our mission of gender equality and social justice.



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17. Code of Conduct for Staff

Staff must always:

- a. Ensure their behavior is based on NFD CHETNA's values, adheres to this policy and NFD CHETNA's Code of Conduct, and always upholds and promotes the rights and welfare of rights holders and the communities we work with, including vulnerable adults.
- b. Promote and raise awareness of this policy to everyone they come into contact with in their work.
- c. Ensure they are aware of their SEA and Safeguarding Focal Point who is responsible for advising on and mitigating risk in line with this policy.
- d. Report any suspicions, concerns, or behaviors that breach this policy to the appropriate person(s). More details on reporting can be found in the Annexure.
- e. This includes (but is not limited to) any suspicions or incidents of sexual abuse and exploitation carried out by staff, other NFD CHETNA representatives, partners, community members and others.
- f. Ensure that the rights of communities are central to any activities carried out in their area of work.
- g. Mandatorily report cases of SEA or any cases/ incidents they believe might lead to SEA.

Staff must never:

- h. Sexually exploit or abuse anyone we come into contact with through our work, this policy addresses harms carried out towards community members, including vulnerable adults in particular.
- i. Engage in any sexual activity with the community and beneficiaries
- j. Engage in any sexual activity with children.
- k. Engage in any kind of exploitative or harmful behavior towards members of a community that NFD CHETNA works with or near to.
- l. Raise malicious complaints or use the policy for purposes other than what it is intended for.

PSEA Focal Points must always:

- m. Work with others to create a safe environment where staff and others feel able to raise concerns without fear of retribution.
- n. Ensure that this policy is displayed at prominent places within the office, as well as online, and to make it accessible to all members of staff.
- o. Ensure that all inductions include a discussion of this policy.
- p. Deliver training to all staff on this policy and other policies that fall within the SEA and other Safeguarding concerns remit.



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- q. Work with others to ensure that the values, commitments, and procedures set forth in this policy are embedded throughout all NFD CHETNA's programs and activities, and those of our partners.
- r. Ensure that they raise all concerns and complaints relating to SEA and Safeguarding to the Safeguarding Committee.

Role of the PSEA Focal Point

- s. The PSEA Focal Point Person must fill in the standard complaint form as the complaint will be coming in from the community. This is in tandem with survivor centric approaches.
- t. While receiving a complaint, the focal point must, as much as possible, fill in the standard complaint form attached at the end of this policy. Basic information such as who the complainant is and what they allege (what happened), details of the respondent, region, name and details of witnesses (if any) and any other document of evidence, how the complainant can be contacted again, needs to be collected by the focal points.
- u. Based on this first complaint assessment, the focal point must inform the Safeguarding Committee of the detailed complaint, within 24 hours of receiving the complaint. In case the complaint is against any member of the Safeguarding Committee, it can be reported to the CEO, any complaints against the CEO can directly be reported to the Board.

Complaint against	Complain to
Any employee/Consultant/ Vendor/Intern/volunteer	PSEA Focal point
Against Focal Point	Internal Committee Presiding Officer
Member Safeguarding Committee Presiding Officer	Secretary/CEONFD
Director of the Centre	Chairman

- v. Information on the immediate needs of the complainants should also be collected and the PSEA focal point should refer the complainant to the appropriate services including health, safety, shelter and psycho-social support. The focal point will collate a database of organizations providing health, safety, shelter and psycho-social support for all the NFD CHETNA locations. This list may be reviewed and revised on an annual basis.
- w. Anonymous complaints are complaints in which the victim/complainant is unknown. However, anonymous or incomplete complaints may not lead to investigation, but they should be recorded as they may supplement/ complement any information needed for a future incident.
- x. The focal point must inform the complainant or the person reporting the case about the confidentiality policy of the complaint mechanism and about the steps of the process. The focal point should obtain a written consent from the complainant for



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the information to be made available to others within the complaint management system on a need-to-know basis. In case the complainant/ survivors/ Witness request for confidentiality, NFD CHETNA shall do the needful.

18. Process of Investigation

- a. Complaints can be registered through calls, emails, messages, and letters. NFD CHETNA will ensure reasonable confidentiality of witnesses, protection of all parties, and the security of all relevant records and documentation concerning SEA cases.
- b. Within 24 hours the complaint is acknowledged and the SEA and PSEA Focal Point (or other staff member as appropriate) will engage with the complainant/survivor to ensure they are safe and their concerns are understood.
- c. The Internal Committee is informed so they can support as appropriate.
- d. The investigation procedure that will be followed will be the same as outlined in the NFD CHETNA Internal Committee Procedures under the Anti-Sexual Harassment Policy. In addition to this, in the case of a person below the age of 18, the relevant laws will be followed.
- e. If an investigation cannot be carried out (e.g. if the survivor does not want an investigation or there is insufficient information to pro NFD CHETNA) then the Panel will close the case and assess what other actions can be taken to address concerns e.g. awareness raising.
- f. Risk assessment carried out to address any immediate security or welfare concerns, and legal guidance sought.
- g. An investigation can include carrying out any interviews, gathering any available evidence, and producing an investigation report.
- h. The complainant/survivor should be interviewed first (or provide a written response to questions submitted by the Investigation Team where a verbal interview is not possible), followed by any witnesses and the complainant if not the survivor, and then the subject of complaint. It is important to note that sexual exploitation and abuse in all its forms usually occurs away from the public eye and it therefore may be difficult to produce evidence. An individual can raise a complaint even if they can point to no objective evidence other than their own experience.
- i. The Investigation Report is submitted to the CEO/ COO.
- j. The subject of complaint and the complainant have the right to appeal against the decision, in line with NFD CHETNA's HR policies and procedures.
- k. Feedback must be sought from the survivor/complainant and incorporated into the lessons learnt conversation. Lessons learnt to be shared as appropriate, removing identifiable information, with governance boards and other relevant bodies to ensure key learning is shared and improvements made to practice.



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19. False/ Malicious Allegations

False or malicious allegations of sexual harassment, exploitation and abuse are extremely rare. However, if a member of NFD CHETNA staff is found to have made an allegation that they knew to be false they will be subject to disciplinary action, up to and including termination of employment. It must be noted that if a case is not upheld that does not mean that the complaint was false, rather that there was insufficient evidence or that, even if the complaint is found not to reach the threshold for sexual harassment, it may represent harassment or sexist behavior that is contrary to NFD CHETNA policies and Code of Conduct.

20. Who can complain/report?

Complaints can also be brought by someone else other than the survivor of SEA, be it a NFD CHETNA employee/ consultant, be it a witness, a relative, or a friend for instance. In any case, survivor's wishes must be considered, particularly when there is a risk of additional physical, and/or emotional harm. The complainant is entitled to protection in case there is a risk of retaliation.

21. Selection criteria of Focal Point Person

PSEA focal point person will be selected by the Director and this will be communicated to all employees and representatives of NFD CHETNA. Focal points must fulfill the requisite criteria:

- a. Present employee of NFD CHETNA with a designation of senior manager and above
- b. Has proven integrity, objectivity and professional competence
- c. Is capable of demonstrated sensitivity and knowledge of cultural and gender issues; experience in Gender Based Violence programming is preferred
- d. Can understand the local language (Accessibility)
- e. Has demonstrated experience of working directly with local communities
- f. Has good communication skills
- g. Can be of any gender, but ensure equal representation across all offices

The focal point person in each location will be the office holder/ regional director/ coordinator unless notified otherwise.

22. Documenting the complaint

All complaints are written and are documented by the focal point who would communicate any such complaints to the Safeguarding Committee.

NFD CHETNA employees must inform the respondent of the complaint when a preliminary inquiry or an investigation is to be conducted. He/she/they must be given an opportunity to answer the allegations in writing and to produce evidence to the contrary. A detailed record of information gathered via the complaints protocol should be kept confidential. Every effort must be made to ensure the security of such files, including through the use of locked file cabinets and password to protect electronic files.



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Annexures

23. Definitions

- **Sexual abuse** refers to the actual or threatened physical or psychological intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes sexual activity with anyone who looks to, or benefits from, organization's services or program, or with anyone under 18.
- a. **Sexual exploitation** refers to 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. It includes transactional sex, solicitation of transactional sex and exploitative relationships.
- b. **Sexual harassment** refers to any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular when NFD CHETNA creating an intimidating, hostile, degrading, humiliating or offensive environment.
- c. **Survivor/victim** refers to a person who has experienced sexual exploitation or abuse. The terms 'victim' and 'survivor' can be used interchangeably. 'Victim' is a term often used in the legal and medical sectors. 'Survivor' is the term generally preferred in the psychological and social support sectors because it implies resiliency.
- d. **Zero tolerance** refers to zero tolerance commitment to immediate operational response when a concern is raised and an obligation on any staff, volunteers and associated personnel to report concerns as soon as they arise. It includes protection of, and non-retaliation towards, whistle-blowers or anyone else reporting concerns. Zero tolerance to SEA includes a prohibition on transactional sex by any personnel, regardless of local legislation.
- e. **Sexual Harassment versus SEA:** SEA occurs against a beneficiary or member of the community. Sexual harassment occurs between personnel/staff, and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. Sexual harassment is not covered by SEA.
- f. **Internal Committee:** the Internal Committee, in case of NFD CHETNA, will be constituted at the institutional level to address the issues pertaining to Sexual Harassment at Workplace and the complaints pertaining to SEA.
- g. **Code of Conduct:** A set of standards of behavior that staff of an organization are obliged to adhere to.
- h. **Suspicion of misconduct:** A concern that has been raised through any of the reporting pathways. This suspicion is assessed at an initial case conference / stakeholder panel.
- i. **Allegation of misconduct:** If, at the case conference / stakeholder panel stage there is a decision to investigate the suspicion of misconduct then it is treated as an 'allegation of misconduct'.



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- j. **Outcome of Investigation:** Once an allegation is investigated and the investigation report is reviewed, the resulting recommendations are referred to as the 'outcome of investigation'.
- k. **NFD CHETNA Community:** The community and public stakeholders that NFD CHETNA interacts with during its work like students, youth, teachers, event participants, trainees, interns, community members, project beneficiaries, farmer producer groups, self-help groups, partner NGOs and CBOs, implementing partners, beach committees, hospitality establishments and many more.
- l. **Related personnel:** Employees of NFD CHETNA, NFD CHETNA activities and or associated institutions affiliates and collaborators in any Offices. The term also includes Board members, volunteers, interns, and international and local consultants, in addition to individual and corporate contractors of these entities and related personnel. This includes non-NFD CHETNA entities and their employees and individuals who have entered into partnership, sub-grant or subrecipient agreements with NFD CHETNA.
- m. **Third-Party Personnel** refers to any person who is employed by a third-party who collaborates with the organization such as by means of a service agreement and is a service provider.
- n. **Complainant:** a person who raises a concern/ makes a complaint brings an allegation of SEA in accordance with established procedures. This person may be a SEA survivor or another person who is aware of the wrongdoing; complainant, if different from the survivor, should be protected from retaliation for reporting about SEA. Where there is any conflict of interest between the survivor and another interested party, the survivor's wishes must be the principal consideration in case handling, particularly when there is a risk of additional physical and/or emotional harm.
- o. **Whistleblower:** For the purposes of SEA Policy, a whistleblower is the complainant (not the survivor) who reports the concern. A type of complainant, not the survivor, who is a humanitarian aid worker making a report of SEA.



Rishpa Jain

Focal Points for PSEA complaints in NFD CHETNA

Year: 2026

Any beneficiary of the organization should contact following focal points of the organization in case she/he faced sexual exploitation and abuse

1. Name:

- a. Designation:
- b. Contact number:
- c. Contact email:
- d. Address:

2. Name:

- a. Designation:
- b. Contact number:
- c. Contact email:
- d. Address:

SECTION 1

Name of Complainant: _____

Address/Contact details: _____

Mobile contact: _____

Age: _____ Gender: _____

Name of Victim (if different from Complainant): _____

Mobile contact: _____

Address/Contact details: _____

Age: _____ Gender: _____

Name(s) and address of Parents, if under 18: _____

Has the Victim given consent to the completion of this f m? ☐ YES ☐ NO



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JGM

Date of Incident(s): _____

Time of Incident(s): _____

Location of Incident(s): _____

Physical & Emotional State of Victim (Describe any cuts, bruises, lacerations, behavior, and mood):

Witnesses: Name and Contact Information:

Brief Description of Incident(s) (Attach extra pages if necessary):

Name of Accused person (s): _____

Job Title of Accused person(s): _____

Organization Accused person(s) Works For: _____

Address of Accused person(s) (if known):

Age: _____ (if known)

Sex: _____

Physical Description of Accused person(s):



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Have the police been contacted by the victim? ☐ YES ☐ NO

If yes, what happened?

If no, does the victim want police assistance, and if not, why?

Has the victim been informed about available medical treatment? ☐ YES ☐ NO

If yes, has the victim sought Medical Treatment for the incident? ☐ YES ☐ NO

If Yes, who provided treatment? What is the diagnosis and prognosis?

What Advice did you provide the victim? what action did you take?



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SECTION 2 What immediate security measures have been undertaken for victim?

Who is responsible for ensuring safety plan (Name, Title, Organization):

Any other pertinent information provided in interview (including contact made with other Organizations, if any):

Details of referrals and advice on health, psychosocial, legal needs of victim made by person completing report:

Report completed by: _____

Name: _____ Position/ Organization: _____

Date: _____ Time: _____ Location: _____

Has the Complainant been informed about NFD CHETNA 's procedures for dealing with complaints? ☐ YES ☐ NO

Reporting Format

Date of Incident	Date of Reporting	Alleged Perpetrator National/ International	Gender of Survivor	Age of Survivor	Type of allegation	Action Taken	Findings	Interim Action/ Assistance rendered	Date investigation concluded on	Referral for criminal al pro NFD CHETNA findings
					SE/ SA					



Reported by

Employment Verification and Reference Check form NFD CHETNA AHMEDABAD

Employment Verification and Reference Check form

Mr. / Ms. _____ is being considered for a suitable position at NFD CHETNA. Your name has been received in References. We would like to request you for your valuable time out to complete the Organizational Reference Check procedure to expedite the hiring and onboarding process. Please verify the details below with your comments and fill in the details where applicable. Kindly also authenticate the documents provided by the candidate, if any (as attached).

Details	Information Stated in Application (pre-filled)	Information Verified YES / NO, Add remarks if any
Employee Name		
Organization Name		
Period of Employment		
Last Designation		
Salary		
Reporting Manager		
Reason for discontinuance from service		
Eligibility for Rehire		
Duties & Responsibilities		
Performance at Work		
Any Integrity /Disciplinary/Misconduct issue that the subject was involved in. Please select from the options below: - Financial indiscipline / Misappropriation of Fund - Harassment of any kind - Data Integrity - Sexual exploitation and Abuse		
Exit formalities and Full & Final Settlement is complete /Pending		
Verifier Details		
Verifier Name		
Verifier Designation		
Verifier Contact No/Email Id.		
Verified Date		

Thank you for completing the reference check and verification.



[Handwritten Signature]

Joining Procedures - Self-Declaration Form NFD CHETNA AHMEDABAD

I, _____, have been engaged / appointed as an
_____ at NFD CHETNA since _____.

I hereby self-declare and confirm that all the information and testimonials I have submitted about my qualification, experiences and references are correct and true.

I hereby also declare the following (please ✓ the correct option from YES / NO):

a	Have you ever been arrested / prosecuted / kept under detention / bound down / fined by a court of law for any offence?	YES / NO
b	Have you ever been involved in sexual misconduct of any nature?	YES / NO
c	Have you ever been debarred from any examination or rusticated by any University or any other educational authority / Institution / debarred / disqualified by any Public Service Commission from appearing at its examination / selection?	YES / NO
d	Is any case pending against you in any court of law / in any University or any other educational authority / institution, at the time of taking up this job/role/position/ engagement with NFD CHETNA?	YES / NO

In case you answered 'YES' to any of the matter above, please give details:

NFD CHETNA has adopted a Zero Tolerance Policy towards any kind of mis-conduct, harassment, violence, sexual exploitation and abuse. NFD CHETNA has policies and systems that ensure to be a fully compliant organization which safeguards its employees, partners, stakeholders and community members, especially children and women.

I hereby declare that I will abide by all the Rules and Policies of the Centre such as Gender policy, PSEA policy, Cyber safety policy, Financial integrity standards, Anti Bribery policy, POSH, Child Protection, Data Safety & Protection policy and all the guidelines governed by NFD CHETNA's Code of conduct, Rules and Office orders as defined from time to time.

I, hereby, declare that I have read the Policies and SOPs including the PSEA policy and I give an undertaking that I will adhere to the required code of conduct.

Name: _____ Signature: _____ Date: _____



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