



Meeting Point International

PROTECTION FROM SEXUAL EXPLOITATION, ABUSE AND HARASSMENT (PSEAH) POLICY

Meeting Point International (MPI)

2026

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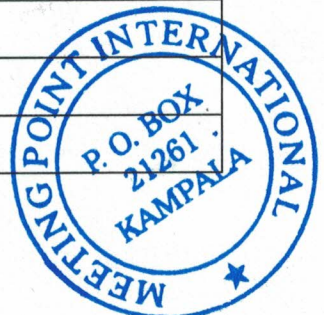




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1. INTRODUCTION

Founded by Rose Busingye in 1992, Meeting Point International (MPI) is a Ugandan non-governmental organization working with women, men, youth and children from the slums of Kampala, who are mainly affected and infected by HIV/AIDS.

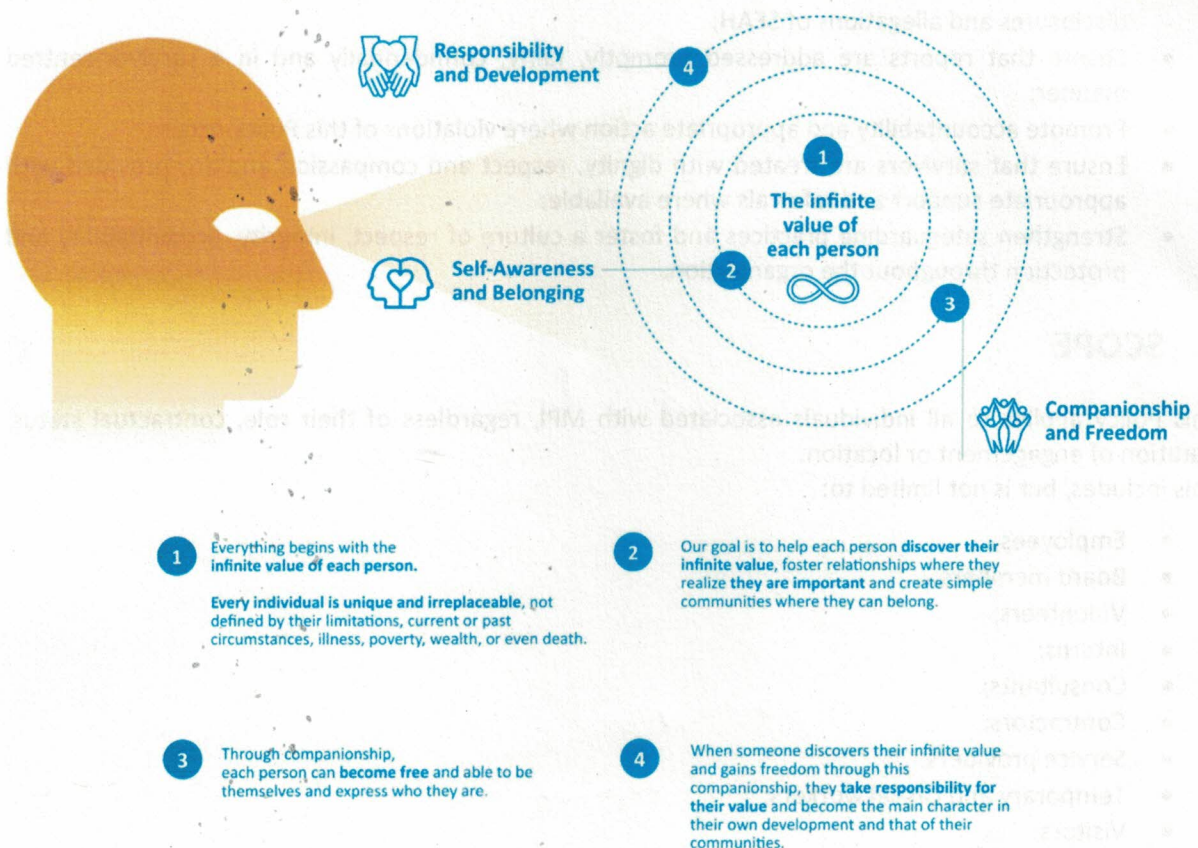
1.1 MPI's Vision

For every person to discover their infinite value and dignity, through a journey towards their own human development and that of their communities.

1.2 Our Mission

MPI aims at continuously accompanying every person and community, prioritizing victims of HIV/AIDS, promoting education at all levels and committing to poverty alleviation.

1.3 MPI's Method





1.4 Relevance of PSEAH Policy

Meeting Point International (MPI) is committed to providing a safe, respectful, inclusive and dignified environment for all individuals who interact with the organization.

MPI recognizes that Sexual Exploitation, Abuse and Harassment (SEAH) constitute serious violations of human rights, safeguarding principles and organizational values and can cause significant physical, psychological, emotional and social harm.

2. PURPOSE

The purpose of this Policy is to:

- Prevent Sexual Exploitation, Abuse and Harassment in all MPI programmes, activities and operations;
- Promote awareness and understanding of acceptable and unacceptable conduct among all individuals covered by this Policy;
- Establish clear standards of behaviour and professional boundaries;
- Provide safe, confidential and accessible mechanisms for reporting concerns, suspicions, disclosures and allegations of SEAH;
- Ensure that reports are addressed promptly, fairly, confidentially and in a survivor-centred manner;
- Promote accountability and appropriate action where violations of this Policy occur;
- Ensure that survivors are treated with dignity, respect and compassion and are provided with appropriate support and referrals where available;
- Strengthen safeguarding practices and foster a culture of respect, integrity, accountability and protection throughout the organization.

3. SCOPE

This Policy applies to all individuals associated with MPI, regardless of their role, contractual status, duration of engagement or location.

This includes, but is not limited to:

- Employees;
- Board members;
- Volunteers;
- Interns;
- Consultants;
- Contractors;
- Service providers;
- Temporary and casual workers;
- Visitors;
- Donors and sponsors acting on behalf of MPI;
- Partner organizations and their personnel when engaged in MPI-supported activities;
- Any other person representing or acting on behalf of MPI.



This Policy applies at all times when individuals are engaged in activities connected to MPI, including:

- Within MPI premises and facilities;
- During programme implementation and service delivery;
- During field visits, home visits and community outreach activities;
- During meetings, trainings, workshops and events;
- During work-related travel;
- During online interactions and social media activities connected to MPI;
- Outside working hours where conduct may impact beneficiaries, colleagues, partners, the organization or its reputation.

All individuals covered by this Policy are expected to comply with its provisions and standards of conduct.

4. RELATED POLICIES

This Policy shall be read and implemented in conjunction with other relevant MPI policies, procedures and codes, including but not limited to Code of Conduct, Safeguarding Policy and Gender Equality Policy.

5. GUIDING PRINCIPLES

Zero Tolerance: MPI maintains zero tolerance for all forms of Sexual Exploitation, Abuse and Harassment (SEAH). Any violation of this Policy constitutes serious misconduct and may result in disciplinary action, including termination of employment or contractual relationships and referral to the relevant authorities where appropriate and lawful.

Survivor-Centred Approach: MPI shall place the rights, wishes, dignity, safety and wellbeing of survivors at the centre of all prevention, reporting and response processes. Survivors shall be treated with respect, compassion and non-discrimination and shall be provided with information, support and referral options in a manner that promotes informed choice and minimizes the risk of further harm. Where the survivor is a child, the best interests of the child shall be a primary consideration.

Accountability: All individuals covered by this Policy share responsibility for maintaining a safe environment and preventing SEAH. Managers, supervisors and designated focal persons have additional responsibilities to promote compliance, address risks and ensure that concerns are appropriately managed and reported.

Confidentiality: Information relating to reports, allegations and investigations shall be handled confidentially and shared only on a strict need-to-know basis. MPI shall take all reasonable measures to protect the privacy and dignity of survivors, complainants, witnesses and other affected individuals.

Non-Retaliation: MPI prohibits any form of retaliation against individuals who report concerns, make complaints, provide information, participate in investigations or otherwise support the implementation of this Policy in good faith. Any act of retaliation shall be treated as serious misconduct.

Do No Harm: All actions taken under this Policy shall seek to avoid causing further harm to survivors, complainants, witnesses and affected individuals. Prevention, reporting, investigation and response processes shall be implemented in a manner that prioritizes safety, dignity and wellbeing.



6. DEFINITIONS

Child: Any person below the age of eighteen (18) years, regardless of local legal definitions of adulthood.

Complainant: Any person who reports a concern, suspicion, allegation or incident under this Policy. A complainant may be the survivor or another person acting in good faith.

Retaliation: Any direct or indirect action taken against a person because they reported a concern, made a complaint, participated in an investigation or supported the implementation of this Policy. Retaliation may include threats, intimidation, harassment, discrimination, victimization, exclusion or any other adverse treatment.

Sexual Abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal, coercive or exploitative conditions. Sexual abuse may occur in person, online or through digital communication. All sexual activity with a child constitutes sexual abuse regardless of local laws concerning the age of consent or age of majority.

Sexual Exploitation: Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including but not limited to obtaining sexual favours, financial benefit, social benefit or political advantage from another person. Sexual exploitation may include transactional sex, solicitation of sexual favours or the abuse of authority, influence or resources for sexual purposes.

Sexual Harassment: Any unwelcome sexual advance, request for sexual favours, verbal, non-verbal or physical conduct of a sexual nature, or any other behaviour of a sexual nature that may reasonably be expected or perceived to cause offence, humiliation, intimidation or distress. Sexual harassment may occur in person, in writing, verbally, electronically or through digital communication platforms.

Survivor: A person who has experienced Sexual Exploitation, Abuse or Harassment. The term survivor recognizes the dignity, resilience and capacity of the individual and is generally preferred to the term victim.

Witness: Any person who has observed, received information about, or has reasonable grounds to suspect an incident or risk of Sexual Exploitation, Abuse or Harassment.

7. EXAMPLES OF PROHIBITED CONDUCT

7.1 Understanding Unwelcome Conduct

Individuals may have different personal, cultural or social perceptions regarding behaviour, communication and interpersonal interactions. While some behaviours may appear acceptable or harmless to one person, they may be perceived as unwelcome, intimidating, humiliating, offensive or inappropriate by another.

In assessing whether conduct may constitute Sexual Harassment, consideration shall therefore be given not only to the intention of the person engaging in the behaviour, but also to the impact of that behaviour on the person receiving it and whether a reasonable person would consider the conduct unwelcome, inappropriate or likely to create an uncomfortable, hostile, intimidating or offensive environment.

A person does not need to object repeatedly, explicitly refuse, or express discomfort for conduct to be considered unwelcome. Any behaviour of a sexual nature that causes another person to feel uncomfortable, unsafe, humiliated, pressured or intimidated may constitute Sexual Harassment under this Policy.



The examples below are intended to illustrate behaviours that may constitute Sexual Exploitation, Abuse or Harassment. The list is not exhaustive.

7.1.1 Sexual Harassment

Sexual harassment may include, but is not limited to:

- Unwelcome sexual comments, jokes, remarks or innuendos;
- Repeated requests for dates, meetings or private encounters after a person has declined;
- Making comments about a person's body, appearance, clothing or sexual life;
- Sending sexually suggestive messages, photographs, videos, emojis or other content through social media, email, text messages or other digital platforms;
- Displaying sexually explicit or offensive images, videos or materials in the workplace or during work-related activities;
- Unwanted flirting, propositions or sexual advances;
- Staring, leering, winking or making sexually suggestive gestures;
- Asking intrusive or inappropriate questions about a person's relationships, sexual orientation or private life;
- Making promises of employment opportunities, promotion, benefits or favourable treatment in exchange for sexual favours;
- Threatening negative consequences, dismissal, loss of benefits or other disadvantages if sexual advances are rejected;
- Unwanted physical contact, including touching, patting, rubbing, hugging, kissing or blocking someone's movement;
- Creating an intimidating, hostile, humiliating or sexually offensive work environment.

7.1.2 Sexual Exploitation

Sexual exploitation may include, but is not limited to:

- Requesting or obtaining sexual favours in exchange for money, food, services, employment, education, transportation, accommodation, medical assistance or any other benefit;
- Using a position of authority, influence or trust to obtain sexual access or sexual favours;
- Exploiting a person's vulnerability, dependency or difficult circumstances for sexual purposes;
- Offering assistance or preferential treatment in return for sexual activity;
- Soliciting transactional sex from beneficiaries or community members;
- Establishing relationships that involve an abuse of power or unequal power dynamics connected to MPI assistance or services.

7.1.3 Sexual Abuse

Sexual abuse may include, but is not limited to:

- Any sexual activity carried out through force, coercion, threats, intimidation or manipulation;
- Any unwanted sexual act or attempted sexual act;
- Sexual assault or rape;
- Forcing or pressuring a person to engage in sexual activity;
- Non-consensual sharing of intimate images or sexual content;
- Any sexual activity involving a child under the age of 18 years;
- Grooming a child or vulnerable adult for sexual purposes, whether in person or online.



7.1.4 Additional Prohibited Conduct

The following behaviours are also prohibited under this Policy:

- Failing to report concerns, suspicions or allegations of SEAH;
- Deliberately concealing information relating to SEAH;
- Retaliating against a complainant, survivor, witness or any person involved in reporting or investigation processes;
- Making knowingly false or malicious allegations;
- Interfering with, obstructing or attempting to influence an investigation.

8. PREVENTION MEASURES

MPI is committed to preventing Sexual Exploitation, Abuse and Harassment (SEAH) through practical safeguarding measures applied across all programmes and operations.

Safeguarding is integrated into recruitment, onboarding and staff management. Whenever possible, MPI carries out reference checks and requests candidates to declare any relevant past misconduct or criminal records. Safeguarding expectations are clearly communicated during recruitment and are part of the employment relationship from the beginning.

MPI recognizes that SEAH risks may arise particularly in field activities, home visits, community-based work, distribution of assistance, transport arrangements, or any situation involving direct contact between staff and beneficiaries. For this reason, staff are expected to apply professional boundaries at all times and to consider safeguarding risks when planning and implementing activities.

Where MPI works with partners, consultants or service providers, safeguarding expectations are included in agreements. Partners are required to respect the same principles of zero tolerance and cooperate with MPI in preventing and addressing SEAH risks.

9. REPORTING AND RESPONSE

MPI ensures that all concerns, suspicions or allegations of SEAH are taken seriously and reported through appropriate channels identified by the Safe Guarding Focal Person and stated on the Safe Guarding Policy. Any staff member or associated person who becomes aware of a possible case of SEAH has a duty to report it immediately. Reporting does not require proof or investigation; reasonable suspicion is sufficient. Reports can be made through the Safe Guarding Focal Person. Where reporting channels are not accessible, staff should use the most direct and safe alternative available.

All reports are handled confidentially and shared only with those directly involved in managing the case. Once a report is received, MPI will first ensure that any immediate safety risks are addressed. Where needed, the survivor will be supported and referred to appropriate services as soon as possible. The case is then recorded and reviewed to determine whether further action or investigation is required.

Investigations, when necessary, are conducted in a fair and confidential manner. The purpose of the investigation is to understand what happened and determine whether this Policy has been breached.



10. SURVIVOR SUPPORT AND ASSISTANCE

MPI applies a survivor-centred approach in all SEAH cases. This means that the dignity, safety and wellbeing of the survivor are always the priority.

Survivors are offered support and referral to available services, depending on context and accessibility.

This may include medical care, psychosocial support, protection services or legal assistance.

Support is provided regardless of whether the case proceeds to investigation or whether the outcome is confirmed. Assistance is not conditional on proof.

All support is provided with the informed consent of the survivor. Where the survivor is a child, MPI applies child safeguarding principles and ensures that all actions are guided by the best interests of the child and involve caregivers where appropriate.

11. CONFIDENTIALITY AND NON-RETALIATION

MPI treats all SEAH-related information as strictly confidential. Information is shared only on a need-to-know basis with those directly involved in case management or safeguarding response.

Personal data is protected in line with MPI Data Protection Policy. The identity of survivors, complainants and witnesses is protected at all stages of the process.

MPI strictly prohibits retaliation against anyone who reports a concern or participates in a safeguarding process in good faith. Retaliation includes threats, intimidation, harassment, discrimination or any negative treatment linked to reporting or cooperation.

Any form of retaliation is considered a serious breach of this Policy and may lead to disciplinary action.

12. DISCIPLINARY MEASURES

Any violation of this Policy is considered serious misconduct.

Depending on the severity of the case, disciplinary measures may include verbal or written warning, suspension, termination of employment or contract, or termination of partnership agreements. Where appropriate, cases may also be referred to relevant authorities in accordance with local law.

Disciplinary decisions are based on the outcome of internal review or investigation and are taken in line with MPI internal procedures.

13. DOCUMENTATION AND PRIVACY

All SEAH reports, cases and related actions are documented and securely stored by MPI. Access is strictly limited to authorized staff involved in safeguarding or case management.

MPI ensures that documentation is handled in a confidential and responsible manner, in line with its Data Protection policy.



PSEAH POLICY

ACKNOWLEDGMENT AND ACCEPTANCE FORM

I, (Full Name)
..... (Position/Role/Organization if applicable),
acknowledge receipt of the Meeting Point International (MPI)'s PSEAH Policy.

I confirm that I have read, understood, and accepted the PSEAH Policy as part of my employment, collaboration, volunteer service, consultancy, partnership, or engagement with Meeting Point International (MPI).

Name : _____
Signature : _____
Date : _____

A copy of the signed PSEAH Policy should be returned to the Administration office or to this email:
admin@meetingpoint-int.org