



Code of Conduct for Protection from Sexual Exploitation, Abuse, and Harassment

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INTRODUCTION

The Armed Conflict Location & Event Data Project (ACLED) does not tolerate sexual exploitation, abuse, or harassment (SEAH) of any kind. This applies to our own organization and extends to those we work with.

This Policy outlines both expectations and requirements for ACLED staff and our partners to manage the risk of SEAH and SEAH incidents, should they occur in the delivery of ACLED business. Preventing SEAH (PSEAH) is a shared responsibility. All organizations must play an active role in addressing SEAH that occurs in the course of their business.

The Policy is able to be adapted to the many contexts in which ACLED activities are delivered. ACLED staff and partners will need to apply judgment based on the risk context in which they are operating. This includes ACLED-related trips and all communication using remote work tools, such as email, instant messaging applications, or audio and video calls.

ACLED also abides by and commits to the standards outlined in the UN Secretary-General's Bulletin ([ST/ SGB/2003/13](#)) focusing on special measures for protecting vulnerable populations from sexual exploitation and abuse.

DEFINITIONS

This Policy uses the following descriptions of sexual exploitation, sexual abuse, and sexual harassment:

Sexual Exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from the sexual exploitation of another.

Sexual Abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual offenses including but not limited to attempted rape (which includes attempts to force someone to perform oral sex); and sexual assault (which includes non-consensual kissing and touching). All sexual activity with someone under the age of consent is considered to be sexual abuse.

Sexual Harassment: A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favors, or engages in other unwelcome conduct of a sexual nature, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.

Sexual harassment can take various forms. It can be obvious or indirect, physical or verbal, repeated or one-off, and perpetrated by any person of any gender towards any person of any gender. Sexual harassment can be perpetrated against beneficiaries, community members, citizens, as well as staff and personnel and it can be in-person or virtual.

IMPLEMENTATION

Implementation of this policy will be conducted in accordance with the ACLED Policy Implementation Procedure, which provides guidance on communicating the policy to the organization.

All ACLED representatives share responsibility for the implementation and monitoring of this Policy.

Board of Directors: It is the responsibility of the Board of Directors to ensure that there is a robust policy and procedure for reporting on SEAH, to monitor SEAH issues as it feels necessary, and to decide whether to report serious incidents to the government or legal authorities.

Executive Director: The Executive Director must ensure that the organization has a designated staff member (“Designated PSEAH Lead”) to support the implementation of this policy and its associated procedures and guidance. The Executive Director must ensure that the appointed individual has the relevant knowledge, skills, and experience to fulfill responsibilities and that they have the time and resources necessary for them to fulfill these responsibilities to the best of their abilities. The Executive Director must ensure that all Board Members are made aware of the PSEAH Policy.

Designated PSEAH Lead: The purpose of the Designated PSEAH Lead is to champion the full implementation of the Safeguarding Policy. They must fulfill their responsibilities to the best of their abilities. When the Designated PSEAH Lead is unavailable, or an individual believes it would be inappropriate to discuss a safeguarding matter with them any ACLED representative with concerns should contact the Executive Director directly or the Human Resources department.

Line Managers: All ACLED managers must ensure that the staff, volunteers, or consultants they recruit or others for whom they have line-management responsibility, or they are holding the relationship are made aware of the policy, relevant procedures, and guidelines. They are to ensure that they receive training and guidance appropriate to their role.

All ACLED Representatives: In addition to adhering to the principle of this policy, all representatives who receive an allegation or disclosure of abuse from any source, or who suspect abuse or have a wider concern about the risk of harm, must report this to the Designated PSEAH Lead.

In addition to this policy, the Designated PSEAH Lead must ensure that there is an appropriate range of procedures and guidance relevant to our work. This will include:

- Safeguarding Policy
- Code of Conduct

- Recruitment and selection
- Induction, training, and ongoing support
- Responding to a SEAH concern
- Confidentiality and information sharing
- Soliciting and publishing information and images
- Supporting our international partners to raise awareness and monitor and report SEAH
- Guidelines in a specific circumstance
- Guidelines for fundraising from adults at risk

This policy and its associated Procedures and Guidance work alongside our wider policy framework. Where there is any conflict between this policy and its associated procedures and other policies, procures, or established ways of working, the priority is always to protect people at risk of harm.

REPORTING

The Armed Conflict Location & Event Data Project (ACLED) is committed to taking all appropriate measures to prevent sexual exploitation, abuse, or harassment of anyone by its employees, agents, independent contractors, or any other persons engaged with ACLED to provide support and services to clients of ACLED.

ACLED shall refrain from, and shall take all reasonable and appropriate measures to prohibit its employees or other persons engaged and controlled by it from exchanging any money, goods, services, or other things of value, for sexual favors or activities, or from engaging any sexual activities that are exploitive or degrading to any person.

All ACLED staff and partners must report any alleged incidents of sexual exploitation, abuse, or harassment, or Policy non-compliance. Reporting is for any suspected or alleged cases of SEAH perpetrated by anyone within the scope of the Policy in connection with official duties or business.

If in doubt, staff and ACLED partners should report an alleged incident. Individuals and organizations found not reporting alleged incidents will be viewed as being non-compliant.

How to Report: All reports of alleged SEAH incidents should be made to the ACLED PSEAH Lead which will be announced in the communication of this policy to the organization, to the Executive Director, or to the Human Resources department at human.resources@acleddata.com.

Where safe to do so, and when in accordance with the wishes of the survivors and whistleblowers, all alleged SEAH incidents that involve a criminal aspect should be reported through the correct local law enforcement channels.

SUPPORT SERVICES FOR SURVIVORS

As a global organization, ACLED has employees and consultants in countries and territories all over the world. ACLED is compiling information on support services in all the locations where we operate. In the interim, the Human Resources department is available as the first point of contact for all those working for ACLED at human.resources@acleddata.com. The HR department will work with the staff member to secure access to support services locally.

Resources listed below are available to all the employees working in the US.

If a US-based employee is a survivor of sexual abuse, exploitation, or harassment (SEAH), that employee is referred to our organization's Employee Assistance Program (EAP). This service provides free and confidential assessments, counseling, and follow-up services to employees. Selected services that might be of relevance in this instance include the following:

- Telephone or virtual counseling for professional assessment for employees
- Legal consultation
- Employee trainings
- Online legal resource center
- Multicultural and multilingual providers available nationwide
- Emergency services available 24 hours/day, seven days/week

To access the service, the survivor of SEAH should contact either the HR department or the benefits team at ACLED's domestic Professional Employer Organization (PEO) at benefits@vensure.com.

Within the US, there are several telephone hotlines that can be reached:

- Victim Connect Resource Center: 1-855-4VICTIM (855-484-2846) <https://victimconnect.org>
- RAINN's National Sexual Assault Hotline: 1-800-656-HOPE (4673) <https://www.rainn.org/national-resources-sexual-assault-survivors-and-their-loved-ones>
- Planned Parenthood: 1-800-230-7526
<https://www.plannedparenthood.org>
- National Sexual Violence Resource Center: 1-877-739-3895 <https://www.nsvrc.org>
- National Center for Missing and Exploited Children: 1-800-THE LOST (843-5678) <https://www.missingkids.org/HOME>
- Crisis Text Line: text BRAVE to the Crisis Text Line at 74174. You can also contact the Crisis Call Center at 1-800-273-8255 or text CARE to 839863 for 24/7/365 crisis support.
<https://www.crisistextline.org>
- Crime Stopper Hotline: 1-800-423-TIPS (8477)
- U.S. Department of Health & Human Services - Toll Free Call Center: 1-877-696-6775