1. PURPOSE

This Procedure aims to clarify and provide guidance to iMMAP personnel and field missions on how to disseminate the principles of the Protection from Sexual Exploitation and Abuse Policy.

2. OPERATIONAL PROCEDURE

iMMAP aims to apply the following measures in order to ensure the application of this policy at both HQ and Field mission level.

a. RECRUITMENT AND SELECTION

**iMMAP personnel:**
- iMMAP job advertisements include a clause on the commitment to Protection from Sexual Exploitation and Abuse.
- A vetting process takes place before any recruitment and it includes specific questions about the candidate’s background, conduct and behavior, from 3 previous employers.
- When possible, a criminal records check is done for the potential candidate.

**iMMAP sub-contractors/implementing partners:**
A vetting process is conducted before any selection of sub-contractors/implementing partners through the United Nations Security Council Sanctions Consolidated List, the OFAC Sanctions List and on SAM.gov.

b. CONTRACTING

**iMMAP personnel:**
At the signing of the contract, the Code of Conduct, Whistle Blower Policy as well as the Protection from Sexual Exploitation and Abuse Policy are shared as part of the contractual package. As part of the contractual package, the signing of the contract implies that these Policies are well understood and part of the personnel obligations.

**iMMAP sub-contractors/implementing partners:**
All contracts with sub-contractors/implementing partners include clauses of commitment to the Protection from Sexual Abuse and Exploitation. The signing of the contract will mean understanding of and compliance to the Protection from Sexual Abuse and Exploitation principles.

c. INDUCTION/TRAINING

**iMMAP personnel:**
- For both national and international personnel, the induction briefing done at HQ and Field mission shall cover an introduction on sexual exploitation and abuse. Responsible to conduct and ensure this briefing is done: HR Director (in HQ) and Country Director (in the field mission). The Country Director can decide to delegate this task to a PSEA Focal person.
- When possible, annual training opportunities (even conducted by other specialized organizations in protection) shall be attended by all personnel.
**iMMAP sub-contractors/implementing partners:**
- If training is planned for sub-contractors/implementing partners, the principles of Protection from Sexual exploitation and abuse shall be disseminated through a dedicated session. This training is compulsory when the sub-contractor/implementing partner has direct contact with beneficiaries. This training can also be done at the same moment of training to iMMAP staff according to resources.
- The Contract Management Focal point and Field Coordinator are responsible to ensure this introductory session is conducted.

d. **MONITORING COMPLIANCE**
For both iMMAP personnel (international and national) as well as for iMMAP sub-contractors/implementing partners compliance to the Protection from Sexual Exploitation and Abuse Policy shall be monitored during the Performance Evaluation Phase and results shall be recorded in the Performance Evaluation Report.

e. **COMPLAINT MECHANISM**
The mechanism to report a sexual misconduct (including harassment, exploitation and abuse) for both iMMAP personnel (international and national) as well as iMMAP sub-contractors/implementing partners is the Whistle Blower and Complaint Mechanism Policy and its procedure.

3. **DISSEMINATION PROCEDURE**

**iMMAP personnel:**
The Protection from Sexual Exploitation and Abuse (PSEA) Policy is shared as part of the contractual package. As part of the contractual package, the signing of the contract implies that this Policy is well understood and is part of the personnel obligations together with all other policies included in the iMMAP Safeguarding and Anti-Discrimination Package.

**iMMAP sub-contractors/implementing partners:**
The iMMAP Contract Management Focal Point has the responsibility to ensure that the PSEA Policy is well understood by the sub-contractor/local partner and that all staff members of the sub-contractor/local partners involved in the work with iMMAP France are informed about the principles of this policy. In order to do so an introductory session about the PSEA Policy’s principles shall be conducted with the sub-contractor/implementing partner and its field staff which will be in direct contact with the beneficiaries.

This introductory session has the aim to:

1. ensure the principles of the Policy are well understood by all sub-contractor/implementing partner’s staff members.

2. ensure that the complaint mechanism described in the Whistle Blower and Compliant Mechanism Policy is understood.

3. ensure that all sub-contractor/implementing partner’s staff members are aware of their obligation and responsibility to disseminate the approved iMMAP communication materials on Protection from Sexual Exploitation and Abuse to the communities (both beneficiary and hosting) they enter in direct contact with.

**Beneficiaries/hosting communities:**
Beneficiaries and hosting communities are not provided with the text of the Protection from Sexual Exploitation and Abuse Policy, but they are directly covered by its principles. Each individual receiving the support of iMMAP projects, being in contact with iMMAP personnel or iMMAP sub-
contractors/implementing partners, has the right to express a concern about iMMAP personnel and/or iMMAP sub-contractors/implementing partners’ behavior that may have breached humanitarian principles and harmed this individual.

iMMAP aims to ensure the PSEA Policy mechanism covers also third parties such as beneficiaries and hosting communities, despite the majority of its programs not having a direct implementation in the field. In order to do this, iMMAP shall work in two ways according to 2 specific cases:

1. iMMAP has its own personnel implementing activities in the field and being in direct contact with affected communities:
   - The Project Focal Point and Field Coordinator or the PSEA Focal point delegated by the Country Director have the responsibility to train all field personnel/enumerators on the Protection from Sexual Exploitation and Abuse Policy principles.
   - The Project Focal Point and Field Coordinator are responsible to ensure that the approved iMMAP communication material on the Protection from Sexual Exploitation and Abuse Policy is adequately disseminated by the field personnel/enumerators to each family/focal point met.

2. iMMAP implements the field activities through a sub-contractor/implementing partner, thus the local partner/sub-contractor’s personnel are directly in touch with the affected communities:
   - The Contract Management Focal Point and Field Coordinator have the responsibility to ensure that the sub-contractor/local partner has well understood the Protection from Sexual Exploitation and Abuse Policy principles.
   - The Contract Management Focal Point and Field Coordinator have the responsibility to ensure that the approved iMMAP communication materials on the Protection from Sexual Exploitation and Abuse principles are properly disseminated and explained to the sub-contractor/implementing partner’s staff working in the field.
   - The sub-contractor/implementing partner has the responsibility to ensure that the approved iMMAP communication materials on the Protection from Sexual Exploitation and Abuse principles is adequately disseminated by the sub-contractor/implementing partners’ personnel with each family/focal point met.