



Organizational Policy on PSEAH (Prevention of Sexual Exploitation, Abuse, and Harassment) of Janathakshan (GTE) Ltd

1. PURPOSE

The purpose of having a **PSEAH (Prevention of Sexual Exploitation, Abuse, and Harassment) Policy** for Janathakshan GTE Ltd is to establish a clear framework that protects both the communities the organization serves and its employees from any form of sexual exploitation, abuse, or harassment. This policy ensures that Janathakshan upholds the highest standards of ethical behaviour, respect, and dignity in all its operations, particularly given its focus on community development and working with vulnerable populations.

Key Purposes of the PSEAH Policy

1. Respect for Dignity and Basic Human Rights:

Janathakshan GTE Ltd is committed to upholding the dignity and basic human rights of all individuals with whom we engage, recognizing that every person deserves respect and dignity. Our operations are grounded in the belief that everyone should be treated with integrity and equity, irrespective of their background, status, or vulnerability. We strive to foster an environment where human rights are safeguarded, and discrimination, exploitation, or abuse are not tolerated.

2. Commitment to Safeguarding Vulnerable People:

Janathakshan GTE Ltd is dedicated to safeguarding the well-being of all vulnerable individuals, including children, adults at risk, and others who may be in positions of vulnerability. We recognize the heightened risks faced by vulnerable people and are committed to providing a safe environment where their rights are protected, and their voices are heard. We will continuously review and enhance our safeguarding measures to ensure that vulnerable individuals are never subjected to harm, neglect, abuse or exploitation.

3. Acknowledgement of Authority and Trust

Janathakshan GTE Ltd recognize that our organization board members, employees, consultants, contracted individuals, volunteers, Interns, subcontractors, grant recipients are in positions of authority and trust, particularly when interacting with vulnerable adults and children. This trust must never be abused. We acknowledge that these positions carry significant responsibilities, and all personnel must act in a manner that maintains the safety, well-being, and dignity of those they work with. Our organization takes this responsibility seriously and implements rigorous measures to ensure that our staff and volunteers always adhere to ethical and professional standards.

4. Prohibition of Exploitation and Abuse

Board members, employees, consultants, contracted individuals, volunteers, Interns, subcontractors, grant recipients of Janathakshan GTE Ltd are strictly prohibited from abusing their position of authority to exploit, abuse, or harm others in any way. Any actions that may lead



to the sexual exploitation or abuse of vulnerable individuals are considered a violation of our core values and are not tolerated within our organization. We will take immediate and appropriate action to investigate any allegations of misconduct, including disciplinary measures, when necessary. Our commitment is to create an environment where all individuals are treated with the utmost respect and dignity.

5. Upholding High Standards of Conduct:

All board members, employees, consultants, contracted individuals, volunteers, Interns, subcontractors, grant recipients of Janathakshan GTE Ltd have an obligation to uphold high standards of personal and professional conduct, both in their work-related duties and in their interactions with others. Our organization expects individuals to act with integrity, professionalism, and accountability always. We are committed to providing training, support, and clear guidance to ensure that all personnel understand and adhere to these standards, fostering a culture of respect, trust, and ethical behavior across all levels of the organization.

6. Sexual Exploitation, Abuse, and Sexual Harassment (SEAH) as Human Rights Violations:

We acknowledge that sexual exploitation, abuse, and sexual harassment (SEAH) are severe violations of basic human rights and are fundamentally incompatible with the values of our organization. Such acts are not only illegal and unethical but also cause lasting harm to individuals and communities. Our commitment to protecting human rights extends to ensuring that all forms of SEAH are eradicated from our organization, and we will take all necessary steps to prevent, address, and respond to any incidents of SEAH.

7. Prevention and Response to SEAH:

We are committed to actively preventing and responding to instances of SEAH. Our approach is proactive, ensuring that all board members, employees, consultants, contracted individuals, volunteers, Interns, subcontractors, grant recipients of Janathakshan GTE Ltd receive comprehensive training on the risks of SEAH and the appropriate behavior expected within the organization. If an incident of SEAH occurs, we will take immediate and decisive action to investigate, address, and rectify the situation. We are dedicated to advancing an organizational culture that prioritizes safeguarding and holds all individuals accountable for their actions.

8. Safeguarding Those Affected by SEAH:

Janathakshan GTE Ltd recognize the profound impact that SEAH has on victim-survivors, and we are committed to safeguarding those affected by such incidents. We will provide comprehensive support to individuals who report SEAH, ensuring they receive appropriate care, assistance, and protection. Individuals will be encouraged to come forward and report incidents in a safe and supportive environment, free from fear of retaliation or retribution with respect, dignity, and sensitivity throughout the process.

9. Confidentiality and Sensitivity in Handling Reports of SEAH:

Janathakshan GTE Ltd will ensure that all reports on SEAH are handled with the highest degree of sensitivity and confidentiality. We understand the importance of protecting the privacy and safety of individuals who report such incidents. Every report will be treated with the utmost



respect, and strict confidentiality will be maintained to safeguard the identity and personal information of the individuals involved. Our commitment to confidentiality is designed to foster a safe environment in which individuals feel empowered to report without fear of exposure or harm.

2. SCOPE / PERSONS AFFECTED

The following must comply with this Policy in the course of their work and when representing Janathakshan (GTE) Ltd):

- Board members and Employees
- Consultants, advisors and contracted individuals
- program participants, volunteers, Interns, subcontractors, grant recipients
- Contractors and their personnel
- Non-government and civil society organisations which have agreements in place with the Janathakshan (GTE) Ltd
- Grant recipients, awardees
- Partner governments and multilateral organisations
- Government agencies which have agreements in place with the Janathakshan (GTE) Ltd
- Multilateral partners
- Other partners

All of the aforementioned must comply with the standards of behaviour set out in this Organizational Policy on PSEAH (Prevention of Sexual Exploitation, Abuse, and Harassment) of Janathakshan GTE Ltd.

These individuals and groups are expected to act in accordance with the principles and reporting requirements outlined in this Policy. They must also abide by their own relevant policies, international declarations, conventions, agreements and domestic legal frameworks that relate to preventing sexual exploitation, abuse and harassment.

3. PRINCIPLES

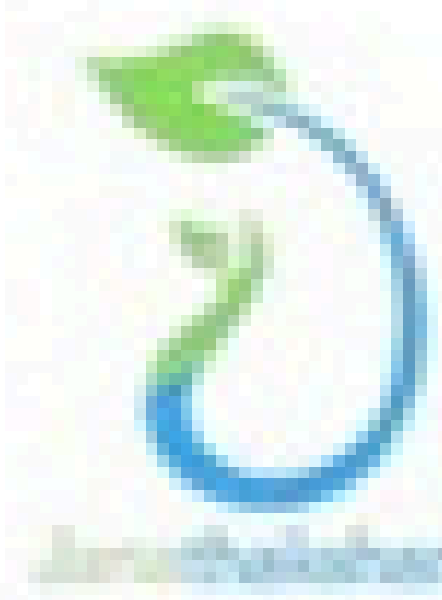
The principles outlined below underpin best practice when developing a PSEAH policy and approach.

3.1 Zero tolerance of inaction.

Behaviour by any board member, employee, consultant, contracted individual, volunteer, Intern, subcontractor, grant recipient of Janathakshan (GTE) Ltd that results in the sexual exploitation or abuse of a child or adult, helps facilitate SEAH or where allegations of SEAH are ignored, will not be tolerated and we will immediately respond and take seriously any concerns raised. The reporting of incidents and responses is an indicator that the risk of SEAH is being managed appropriately. Zero tolerance is defined as acting on every allegation in a fair and reasonable way with due regard for procedural fairness.

3.2 Strong leadership to accelerate culture change.

Strong leadership is essential to set organisational culture, and therefore leaders need to set clear expectations and model respectful behaviour in their interactions at work. This will support



communities, victims/survivors and whistleblowers to feel safe, report concerns and be assured their allegations are taken seriously.

- Strong leaders address SEAH by taking measures to improve diversity and inclusion. This can include:
 - strong, actionable human resource procedures that embed gender equality and PSEAH.
 - inclusion of PSEAH discussions in board meetings and staff meetings
 - having senior champions responsible for PSEAH and encouraging staff gender balance particularly in senior roles.

3.3 Victim-survivor needs are prioritised.

A survivor-centred approach puts the safety, wishes and interest of the survivor first, above all other considerations. This means that the survivor should be empowered. They must be in control. What the survivor needs and wants must be at the centre of any assistance we give. This approach:

- Treats the survivor with dignity and respect.
- Involves the survivor in decision making.
- Provides the survivor with comprehensive information.
- Protects privacy and confidentiality.
- Does not discriminate based on gender, age, race, ethnicity, ability, sexual orientation, or other characteristics.
- Considers the need for psychosocial, medical and legal services to assist the victim-survivor with their recovery.

3.4 Preventing Sexual Exploitation, Abuse and Harassment is a shared responsibility.

Preventing Sexual Exploitation, Abuse and Harassment is everyone's responsibility. Real change to reduce SEAH will not occur unless every sector plays a role — government, business, non-government organisations, institutions, communities and individuals. Janathakshan GTE Ltd requires the commitment, support and investment of its partners for this policy to be effective. All organisations have a responsibility to build their capacity to deal sensitively and effectively with SEAH that occurs in the course of their work.

3.4.1. Gender inequality and other power imbalances are addressed.

Janathakshan GTE Ltd particularly recognises that gender, disability, age, sexual orientation and poverty have powerful intersection points with the likelihood of SEAH. There are also power imbalances at play. Inequalities based on the distinctions of representative/ beneficiary; ability/disability; ethnic and indigenous status; religion; gender identity and sexual orientation; age; health and poverty, can also result in SEAH. The intersection of gender with other forms of inequality can further increase the likelihood of SEAH occurring.

Janathakshan GTE Ltd actions promote gender equality, child protection & safeguarding, social inclusion and accountability towards a 'do no harm' approach.

3.4.2. Stronger reporting will enhance accountability and transparency.

Sexual exploitation, abuse and harassment is a failure of responsibility. Stronger reporting allows an organisation to better monitor SEAH, understand risks, improve assurance and work with organisations to improve systems and safeguards accordingly. Reporting will also help to focus



organisations on the issue by providing a regular prompt that PSEAH is a core obligation of their work.

Janathakshan GTE Ltd aims to prevent SEAH through implementation of this Policy, communication, training and working collaboratively with all workers and partner organisations to safeguard everyone against SEAH.

4. POLICY

The following list of expected behaviours applies to all of Janathakshan GTE Ltd board members, employees, consultants, contracted individuals, volunteers, interns, subcontractors, grant recipients in both their personal and professional lives. At all times board members, employees, consultants, contracted individuals, volunteers, Interns, subcontractors, grant recipients:

- **Maintain a duty to act in a manner which upholds the values and reputation of Janathakshan GTE Ltd.**
- **Undertake to create and maintain a safe and trusted environment that promotes the implementation of this Policy and safeguards everyone from SEAH.**
- **Comply with all relevant laws of the country of residence, or in which he or she is travelling.**
- **Be aware that sexual behaviour is an area particularly sensitive, where conduct may more easily be seen as offensive or be misinterpreted.**
- **Avoid actions or behaviours that could be perceived by others as sexual exploitation, abuse or harassment underpinned by a 'DO NO HARM' approach.**
- **Ensure personal conduct towards a co-worker, partner, client, employee, consultants, contractor, intern, volunteer or beneficiary is not exploitative or such that it reasonably leads to a perception of exploitation.**
- **Ensure photographs, films, videos, including those in social media posts, present vulnerable people in a dignified and respectful manner and not in a vulnerable or submissive manner. This includes ensuring that vulnerable people are adequately clothed and not in poses that could be seen as sexually suggestive.**
- **Ensure that social media use and the sharing of photographs, films and videos are underpinned by informed consent principles and documentation of the informed consent. The in written informed consent is a must of producing any photographs, films, videos, including those in printed or digital media including social media platforms.**
- **Avoid any conduct against a co-worker, partner, client, employee, consultants, contractor, intern, volunteer or beneficiary which can be considered as technology facilitated sexual violence**
- **Read and agree to abide by the expected behaviours outlined in the relevant code of conduct.**
- **Immediately report to (insert appropriate reporting person/group) any concern, suspicion or allegation of SEAH or any alleged policy non-compliance. (Reporting procedures are outlined below).**

In addition, (*Janathakshan (GTE) Ltd*) workers must adhere to the following expected behaviours:



- Janathakshan board members, employees, consultants, contracted individuals, volunteers, interns, subcontractors, grant recipients must not engage in sexual relationships with other employed or associated people, volunteers, downstream partners, beneficiaries as these relationships are based on inherently unequal power dynamics and there is the potential for abuse of power. Such relationships undermine the credibility and integrity of Janathakshan GTE Ltd.

It is strictly prohibited for board members, employees, consultants, contracted individuals, volunteers, interns, subcontractors, grant recipients:

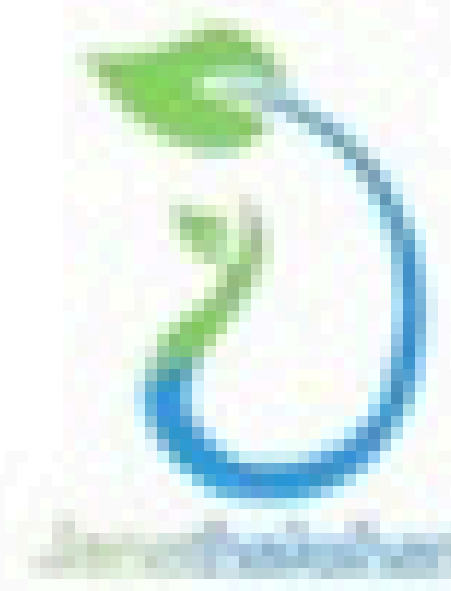
- Sexually exploit or abuse or sexually harass a child or adult.
- Use their position of trust and authority to request any service or sexual favour from beneficiaries of Janathakshan GTE Ltd including adults, children or others in the communities in which Janathakshan GTE Ltd works, in return for protection or assistance, or coerce a person to engage in sexual intercourse or any sexual activity.
- Exchange or withhold from beneficiaries of Janathakshan GTE Ltd including adults, children or others in the communities in which Janathakshan GTE Ltd works. This includes exchange or withhold of money, food, employment, goods, assistance or services for sex or sexual favours or other forms of humiliating, degrading or exploitative behaviour.
- Use Janathakshan GTE Ltd or partner organisation facilities, personnel or resources for the purpose of arranging or facilitating access to sex workers by any person, including visitors to Janathakshan (GTE) Ltd offices or programs.
- Engage in sexual activity with a child under any circumstance, regardless the consent of the child. Even in a country where the age of majority or the age of consent is lower than 18 years, Janathakshan GTE Ltd board members, employees, consultants, contracted individuals, volunteers, interns, subcontractors, grant recipients are forbidden to have sexual activity with anyone under the age of 18 years. A mistaken belief that the child is over 18 is not an excuse.
- Use computers, mobile phones, video cameras, cameras or other technology inappropriately, or to exploit or harass children and/or adults, or to access or disseminate child exploitative material and/or sexually exploitative material through any medium, including social media.
- Procure sex for others, and/or use a third party to do so.

5. DEFINITIONS

Safeguarding: Actions, policies and procedures that create and maintain protective environments to protect people from exploitation, harm and abuse.

Sexual exploitation, abuse and harassment (SEAH) occurs against a child or an adult and can occur between people of the same or different genders. It includes situations such as:

- Sexual exploitation and abuse.
- Sexual harassment.
- Child sexual abuse and exploitation.
- Women and men sexually exploited through sex work.



- Possessing, controlling, producing, distributing, obtaining or transmitting sexually exploitative.
- Images of adults and children; and
- Possessing, controlling, producing, distributing, obtaining or transmitting photographs or videos that may not be explicitly sexual in nature or sexually provocative, however they could be considered sexual in nature if for instance the image would likely cause offence, humiliation or intimidation to the subject of the image.

Sexual Exploitation - 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.

Sexual Abuse - the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Harassment - any verbal or physical conduct or any conduct of a sexual nature that is unwelcome, uninvited or not reciprocated in circumstances in which a reasonable person, having regard to all the circumstances would have reasonably anticipated the possibility that the person harassed would be offended, humiliated or intimidated. This can include unwelcome sexual advances or unwelcome requests for sexual favours or displaying or sending sexually explicit images or asking intrusive questions about someone's personal life, including their sex life. Sexual harassment can take various forms. It can be direct and/or indirect, physical and/ or verbal, repeated or one-off instances and perpetrated by any person of any gender towards any person of any gender. Sexual harassment can be perpetrated against beneficiaries of Janathakshan GTE Ltd's programs, program participants, community members as well as employees and workers.

Child Sexual Abuse - the use of a child for sexual gratification by an adult or significantly older child or adolescent. Sexually abusive behaviours can include fondling genitals; masturbation; oral sex; vaginal or anal penetration by a penis, finger or any other object; fondling breasts; voyeurism; exhibitionism; and exposing the child to, or involving the child in, pornography.

Child Exploitation - one or more of the following:

- Committing or coercing another person to commit an act or acts of abuse against a child.
- Possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material.
- Material.
- Committing or coercing another person to commit an act or acts of grooming or online grooming.
- Using a minor for profit, labour, sexual gratification, or some other personal or financial advantage.

Online Child Sexual Exploitation (or child pornography) - in accordance with the Optional Protocol to the Convention on the Rights of the Child, 'child pornography' means 'any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes.



Child – any person under the age of eighteen (18) years as defined by the Convention on the Rights of the Child irrespective of local country definitions of when a child reaches adulthood.

Vulnerable adults - those aged over 18 years and who identify themselves as unable to take care of themselves/ protect themselves from harm or exploitation; or who, due to their gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.

Victim - Survivor - A person who has SEAH perpetrated against him/her/them or an attempt to perpetrate SEAH against him/her/them.

6. Breach of Policy

Janathakshan GTE Ltd constitute, Sexual exploitation, abuse and harassment as acts of gross misconduct and are therefore grounds for termination of employment, funding or services.

Disciplinary actions/possible outcomes for breach of the Janathakshan GTE Ltd PSEAH Policy can include:

- Referral to local law enforcement authorities (as per national and any mandatory reporting laws), where appropriate.
- Internal investigation.
- Perpetrator standing aside with pay pending investigation.
- Performance management and disciplinary action including formal warnings.
- Training, mentoring and support where appropriate.

7. Shared Responsibility

All Janathakshan GTE Ltd board members, employees, consultants, contracted individuals, volunteers, Interns, subcontractors, grant recipients are responsible for championing good practice and maintaining an organisational culture that prioritises safeguarding against SEAH. Managers and leaders at all levels have responsibilities to support and develop systems that maintain an environment that facilitates implementation of the PSEAH Policy. This includes ensuring that Janathakshan GTE Ltd board members, employees, consultants, contracted individuals, volunteers, Interns, subcontractors, grant recipients understand policy obligations. Managers and leaders must create a safe environment at Janathakshan GTE Ltd for anyone to come forward and raise allegations or concerns of SEAH and immediately respond to any reports. This will be done by:

- Providing victim - survivors with a safe and protected space, where they can speak.
- Ensuring informed consent, confidentiality and data protection with any recording and sharing of information.
- Offering referral to counselling and other support services, in line with the choices, needs and welfare of survivors.
- Assisting survivors to document and lodge a report, in line with the willingness of the survivor.
- Clearly and openly communicating with survivors, including giving feedback on what will happen next.



- Inviting survivors to have a support person with them at any time in the reporting and response process.
- Making every effort to meet survivors' needs, including accommodating requests to have a person of a particular gender present at the time of disclosure.

8. PSEAH Training

PSEAH training will be provided for board members, employees, consultants, contracted individuals, volunteers, Interns, subcontractors, grant recipients of Janathakshan GTE Ltd. Janathakshan GTE Ltd board members, employees, consultants, contracted individuals, volunteers, Interns, subcontractors, grant recipients are provided training related to the Code of Conduct as well.

9. Recruitment

Janathakshan GTE Ltd will apply robust recruitment and screening procedures for all board members, employees, consultants, contracted individuals, volunteers, Interns, subcontractors, grant recipients to reduce the risk of engaging a person who poses an unacceptable risk to children or adults, particularly vulnerable children and adults. These procedures include:

- Referee checks from an applicant's last place of employment/volunteer including when working in overseas locations and will include a question regarding any concerns of sexual misconduct.
- Self-disclosure to include performance or conduct issues regarding concerns or allegations of SEAH during the recruitment process.
- All employment/contracts must contain provisions for potential disciplinary action including termination of employment/assignment following breach of this policy.

10. Risk Management Process

Janathakshan GTE Ltd will design and implement effective risk management processes that include consideration of the risk of SEAH. The process will document the controls in place or to be implemented to reduce or remove the risks of SEAH.

11. Reporting and Investigation

11.1 How to Report

Janathakshan GTE Ltd provides a safe, supportive and secure environment to report alleged incidences of SEAH or policy non-compliance. Janathakshan GTE Ltd will take all concerns seriously and respond immediately and in accordance with Janathakshan GTE Ltd reporting requirements, and subject to the needs and welfare of the survivor. All reports of SEAH will be recorded through Complaint handling procedure, regardless of whether substantiated or full investigation required and Janathakshan GTE Ltd will de-identify complaints at the request of the survivor. The principles of natural justice will apply to all investigations. Janathakshan GTE Ltd board members, employees, consultants, contracted individuals, volunteers, Interns, subcontractors, grant recipients must report any concerns, suspicions or allegations of SEAH or alleged breach of the Janathakshan GTE Ltd PSEAH Policy. A report should be made to one of the following people as applicable:



Any board members, employees, consultants, contracted individuals, volunteers, Interns, subcontractors, grant recipients of Janathakshan GTE Ltd may report a concern regarding sexual exploitation, abuse and harassment or Policy breach to any of the following people:

- Senior Management of Janathakshan GTE Ltd (CEO, Head of Programme, Program Managers, Head of Finance)
- Line Manager of a person who is reporting

Visitors, beneficiaries, and Members of the Public may report a concern regarding sexual exploitation, abuse and harassment through:

- Janathakshan GTE Ltd - Complaint Handling procedures.
- Senior Management of Janathakshan GTE Ltd (CEO, Head of Programme, Program Managers, Head of Finance)
- Board Members of the Janathakshan GTE Ltd.

11.2 Managing Reports

Anyone wishing to make a report anonymously can be access via the email; info@janathakshan.lk . Janathakshan GTE Ltd maintain the above reporting channel with sensitivity and confidentiality.

Anyone reporting a case of SEAH, in good faith, or any person who has cooperated with an investigation into a report of SEAH, will be protected by this Policy. Malicious and vexatious reporting of SEAH with the intention and/or result of harming another person's integrity or reputation amounts to serious misconduct and is subject to disciplinary action up to and including termination of employment. This is distinct from reports made in good faith based on the judgment and information available at the time of the report, which may not be substantiated by an investigation.

Investigation progress will include engagement of and reporting to the Senior Management of Janathakshan GTE Ltd (CEO, Head of Programme, Program Managers, Head of Finance) and Gender Specialist.

11.3 External Reporting

Where safe to do so, and in accordance with the choice, needs and welfare of survivors, alleged SEAH incidents will be reported to appropriate local authorities.

11.4 Investigations

Janathakshan GTE Ltd investigations of SEAH will be carried out in a manner that is timely, fair, objective and as far as is practicable, confidential. This includes the use of appropriate interviewing practice with complainants and witnesses. All information and documented evidence will be held securely and in the strictest confidence as far as is appropriate.

11.5 Survivor Support and Assistance

Janathakshan GTE Ltd will adopt a survivor-centred approach in preventing and responding to SEAH. Janathakshan GTE Ltd will ensure that all responses are developed in a manner that balances respect for due process with a survivor centred approach in which the survivor's needs,



safety and wellbeing remain a priority in all matters and procedures. Furthermore, all actions taken should be guided by respect for choices, needs, rights and dignity of the survivor. Janathakshan GTE Ltd will ensure survivors of SEAH are offered support and assistance such as referral to safe medical, psychosocial and legal services where appropriate and where required to specialised children's or women's services. Survivors will be provided with information on the progression of an investigation and final outcomes.

11.6 Partner Organisations

Janathakshan GTE Ltd will work with Partner Organisations, funding donors and grantees in the prevention of SEAH and Partner Organisations will be advised of avenues available to report concerns regarding SEAH within Janathakshan GTE Ltd.

12 Responsibilities

CEO/Executive Director	<ul style="list-style-type: none"> • Approve the Organizational Policy on PSEAH (Prevention of Sexual Exploitation, Abuse, and Harassment) of Janathakshan GTE Ltd. • Hold senior leadership accountable for compliance with the policy. • Ensure the Organizational Policy on PSEAH (Prevention of Sexual Exploitation, Abuse, and Harassment) of Janathakshan GTE Ltd is upheld throughout the organization and that its principles are integrated into Janathakshan's operations.
Human Resources	<ul style="list-style-type: none"> • Ensure Janathakshan meets all safeguarding obligations under the Organizational Policy on PSEAH (Prevention of Sexual Exploitation, Abuse, and Harassment) of Janathakshan GTE Ltd. • Act as the primary contact for any safeguarding concerns (including anonymous reporting, offering guidance on procedures and reporting). • Support any disciplinary action related to breaches of the Organizational Policy on PSEAH (Prevention of Sexual Exploitation, Abuse, and Harassment) of Janathakshan GTE Ltd by workers. • Integrate PSEAH requirements into recruitment, onboarding, and ongoing staff development processes. • Maintain confidentiality in handling all policy-related cases and support investigations as needed.
Senior Management Team	<ul style="list-style-type: none"> • Lead by example by demonstrating behaviors that align with the Organizational Policy on PSEAH (Prevention of Sexual Exploitation, Abuse, and Harassment) of Janathakshan GTE Ltd. • Ensure that all Managers/Staff integrate PSEAH standards into their daily operations.



	<ul style="list-style-type: none"> • Support any disciplinary action related to breaches of the PSEAH Policy by workers. • Integrate PSEAH requirements into recruitment, onboarding, and ongoing staff development processes. • Maintain confidentiality in handling all policy-related cases and support investigations as needed. • Monitor policy effectiveness and ensure regular updates and training are provided to relevant stakeholders.
Gender Specialist	<ul style="list-style-type: none"> • Review and support policy updates as needed to reflect best practices and organizational standards. • Ensure all staff are aware of and trained in Organizational Policy on PSEAH (Prevention of Sexual Exploitation, Abuse, and Harassment) of Janathakshan GTE Ltd and procedures. • Oversee adherence to safeguarding obligations and ensure resources are allocated for policy implementation and enforcement. • Support staff in understanding and implementing safeguarding measures within their roles. • Ensure any safeguarding-related resources, such as reporting guidelines, are accessible to all staff.
Project Managers	<ul style="list-style-type: none"> • Communicate with the Organizational Policy on PSEAH (Prevention of Sexual Exploitation, Abuse, and Harassment) of Janathakshan GTE Ltd and related procedures to staff and ensure their understanding. • Act as a local point of contact for any policy-related questions or clarifications.
All workers	<ul style="list-style-type: none"> • Understand and follow the Organizational Policy on PSEAH (Prevention of Sexual Exploitation, Abuse, and Harassment) of Janathakshan GTE Ltd and related procedures. • Promptly report any allegations or concerns regarding PSEAH violations through the designated reporting channels. • Participate in training on PSEAH standards to reinforce compliance and awareness.
Interns, volunteers, contractors, partners etc	<ul style="list-style-type: none"> • Adhere to Janathakshan's Organizational Policy on PSEAH (Prevention of Sexual Exploitation, Abuse, and Harassment) of Janathakshan GTE Ltd and report any PSEAH concerns or allegations as per the policy. • Ensure that their actions align with the policy's expectations, maintaining a safe and respectful environment for all. • Participate in relevant policy training or awareness sessions as required by Janathakshan.



13 Related Policies

- Complaint Handling procedure.
- Organizational Policy on Gender Equality
- Inclusion Policy
- Safety and Security Policy

14 Relevant External Policies

International Bill of Human Rights: Provides foundational human rights principles that guide Janathakshan's commitment to respecting and protecting individual rights across all programs.

The UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW): Supports Janathakshan's mission to promote gender equality and ensure programs are inclusive and free from discrimination.

UNSC Resolution 1325: Women, Peace, and Security (WPS): Guides Janathakshan's initiatives focused on empowering women, especially in peacebuilding and resilience activities.

Local Government Policies (Sri Lanka): Includes any policies related to labour laws, workplace conduct, child protection, labor rights, and anti-discrimination that align with Janathakshan's operational standards and legal compliance.

15 Evaluation and Performance

Janathakshan GTE Ltd will monitor compliance through a range of approaches including.

Janathakshan GTE Ltd will monitor compliance with this policy through a variety of methods to ensure adherence and continuous improvement. Monitoring approaches will include:

- **Regular Audits and Assessments:** Conduct internal and external audits to assess compliance with policies and identify areas for improvement.
- **Quarterly/Annual Compliance Reports:** Managers will submit compliance reports on policy adherence and any incidents, ensuring consistent monitoring and accountability.
- **Feedback and Incident Reporting Mechanisms:** Utilize feedback from staff, partners, and beneficiaries through structured reporting channels to identify gaps and strengthen compliance.
- **Annual Training Reviews:** Evaluate the effectiveness of mandatory policy training sessions for all staff, volunteers, and partners, ensuring up-to-date knowledge and understanding.

16 Employee Performance Appraisals:

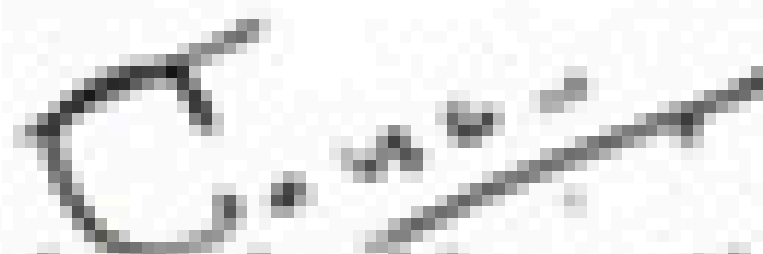
Integrate policy compliance into performance reviews, with specific attention to roles involving high levels of engagement with safeguarding or organizational policies.



17 Revision History

DATE	Revision Number	Change(s)	Prepared by	Approved by
1 st April 2025	1	New Policy	Gender Specialist	CEO

Approved by


 Dr. Janaka Hemathilaka
 CEO
 Janathakshan (GTE) Ltd
 01st April 2025