



PSEA Policy



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Policy on the Protection from Sexual Exploitation and Abuse (PSEA)

Purpose of the Policy	To promote a zero-tolerance policy toward sexual exploitation and abuse (SEA) for all employees in any capacity at the ST Foundation and ensure that the roles, responsibilities, and expected standards of conduct related to SEA are known within the organization. Create and maintain a safe, SEA-free environment by taking appropriate measures to this end, internally and in the communities in which the organization operates, through effective prevention and response work.
Recipients	Contributors in any capacity to the organization
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1. FOREWORD

STMicroelectronics Foundation (hereafter, also just "ST Foundation") is a Geneva-based nonprofit organization founded by STMicroelectronics NV in 2001 and currently operating in several countries. Specifically, STMicroelectronics Foundation develops, coordinates, and sponsors projects that use modern science and high technology to promote the fight against the Digital Divide by identifying computer illiterates, particularly in the world's less privileged communities.

ST Foundation operates in countries with very heterogeneous regulatory, social, and economic environments through the involvement of local partners and/or external staff and, in some cases, STMicroelectronics NV employees acting as ST Foundation volunteers.

For this reason, ST Foundation, in order to maximize the value and protection of its stakeholders, has decided to give its ethical-value system a homogeneous, concrete, and flexible structure by focusing on the adoption of specific guarantee policies and procedures for the beneficiaries of its activities and all other parties that come into contact with the Foundation.

With this in mind, ST Foundation has decided to prepare this Protection Against Sexual Exploitation and Abuse Policy (hereinafter referred to as "PSEA" or "Policy") because there is a growing recognition that "no country, no institution and no family is immune from sexual abuse and exploitation"¹ and, consequently, the need to take preventive measures.

Therefore, this Policy is directly related to:

- ST Foundation's PSEA Code of Conduct (Annex 2), which defines the importance of and identifies behavior requirements for staff by setting reporting requirements for actions that violate it;
- International human rights protection laws, and in particular the provisions on combating trafficking in human beings from which PSEA obligations are derived.²

Thus, with the implementation of this Policy, it becomes possible to create an environment in which beneficiaries are safe and respected and can access the protection and assistance they need.

This Policy applies to persons who are eighteen years of age or older. The Child Protection Policy (Annex 4) already approved by the ST Foundation and the related General Procedure for reporting and handling suspected mistreatment, abuse, or exploitation of girls, children, and teenagers applies to cases involving minors.

¹ [Address to High-Level Meeting on the United Nations Response to Sexual Exploitation and Abuse](#), by António Guterres, 18 September 2017.

² United Nations *Convention against Transnational Organized Crime* of 15 November 2000; Additional protocol of 15 November 2000 to the United Nations Convention against Transnational Organized Crime to prevent, suppress and punish trafficking in persons, especially women and children of 15 November 2000.

2. MISSION STATEMENT

Sexual exploitation and abuse violate universally recognized international legal norms and standards and represent unacceptable and prohibited behavior for all who work in any capacity with ST Foundation. ST Foundation has decided to adopt a zero-tolerance policy toward sexual exploitation and abuse. The Board of Directors and anyone working in any capacity with ST Foundation are expected to uphold the highest standards of personal and professional conduct at all times and provide assistance by acting in a manner that respects and promotes the rights of beneficiaries and other vulnerable members of local communities.

3. PURPOSE OF THE POLICY AND FIELD OF APPLICATION

The purpose of this Policy is to prevent and counteract any behavior that can be traced back to offenses such as sexual abuse, sexual exploitation, sexual or moral harassment as well as any other behavior that may be detrimental to the dignity and honor of the individual.

ST Foundation's commitment is to provide a safe environment for all those who work with the Foundation or are beneficiaries of the Foundation's activities.

The Foundation also expects every individual associated with it to strive to create an environment free of discrimination, harassment, or any other form of offensive or threatening behavior; therefore, each individual working in any capacity with ST Foundation is personally responsible for ensuring compliance with the standards of conduct outlined in this and other applicable policies and procedures and for reporting any situations that may raise concerns about conduct by staff members, volunteers, or Foundation representatives in violation of this Policy.

Moreover, ST Foundation, in the light of the conditions of fragility and hardship that exist in many of the countries in which it operates and of the educational mission that it intends to carry out, is committed to ensuring maximum awareness, both for those who collaborate in any capacity with the Foundation and for the beneficiaries, of what risks are associated with situations of sexual exploitation and abuse, as well as what inviolable rights they have and the related procedures for protecting them.

This PSEA is addressed to the following categories of individuals for whom it should be considered binding:

- contributors, in any capacity, to ST Foundation.
- consultants and other external collaborators of ST Foundation, considered as providers of services of an intellectual nature who participate in the implementation of ST Foundation's projects.

For organizations working in partnership with ST Foundation, please refer to the Partners section, Sec. 6.3.

This Policy shall be made available to all stakeholders.

Compliance with this Policy must be ensured in both professional and private life.

4. PRINCIPLES OF REFERENCE

To address sexual exploitation and abuse, the UN and IASC³ have developed comprehensive policies that complement each other and serve as benchmarks for good programming. The key documents are the following:

A. The 6 IASC core principles (as of 2002, updated in 2019)

IASC indicates 6 basic principles that must be respected in all international organizations and calls on the latter to include the principles in the code of conduct of humanitarian organizations.

The principles, adapted according to the ST Foundation reality, are as follows:

- 1) Acts of sexual exploitation and abuse (SEA) perpetrated by ST Foundation employees in any capacity constitute misconduct of a serious nature that may result in termination of employment or volunteer service.
- 2) Sexual activity with children (persons under the age of 18) is prohibited regardless of the locally recognized age of consent. An erroneous consideration regarding a child's age is not a defense and is never accepted as justification. To protect minors, ST Foundation has adopted a specific Child Protection Policy (CPP) to which reference is made.
- 3) The exchange of money, labor, goods, or services, including assistance given to beneficiaries to obtain sexual favors or services or other forms of humiliating and degrading behavior is prohibited.
- 4) It is forbidden to have any sexual relationship with project beneficiaries by misusing one's role. These situations could have negative consequences on the credibility of the ST Foundation's projects.
- 5) When a collaborator in any capacity has concerns or suspicions regarding an act of SEA by a colleague - whether working for ST Foundation or a Partner organization or other actor involved in a project - he or she must report them through existing means and procedures.

³ The Inter-Agency Standing Committee (IASC) is a unique inter-agency forum for coordination, policy development and decision-making involving the key UN and non-UN humanitarian partners

Specifically, the SEA Focal Point should be informed about any concerns or suspicions, including rumors, that arise in good faith about acts of SEA.

- 6) All collaborators, in whatever capacity, of ST Foundation are expected to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of the PSEA Code of Conduct.

B. The United Nations Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)"

The Bulletin takes up the 6 core principles identified by the IASC and makes them its own, and further

- Defines sexual exploitation and sexual abuse.
- Establishes that acts of sexual exploitation and abuse, SEA, "constitute gross misconduct, and therefore are grounds for disciplinary measures, including summary dismissal.
- Mandates United Nations staff and all entities and individuals who have cooperative agreements with the United Nations to report incidents of abuse.

Furthermore, UN agencies and partners are committed to pursuing a **victim-centered approach** to SEA acts. This approach seeks to empower victims and promote their recovery by prioritizing their rights, needs, and desires to respond to gender-based violence (GBV), including SEA.

Key standards for applying this approach include:

- **Safety:** the victim's safety is the primary consideration.
- **Confidentiality:** victims have the right to choose who they tell their story to or not, and information should be shared only with the victim's informed consent.
- **Respect:** respect for the victim's choices, wishes, rights, and dignity should steer the decisions of organizations. The role of the SEA Focal Point is to provide the victims with the information they need to make informed decisions and facilitate their recovery.
- **Non-discrimination:** victims should receive equal and fair treatment regardless of their age, gender, race, religion, nationality, ethnicity, sexual orientation, or any other characteristic.

ST Foundation embraces all of the above principles and is committed to their effective implementation at every organizational level by binding all collaborators in any capacity and Partners to their compliance so as to ensure the protection of the beneficiary.

5. DEFINITIONS

UN Secretary-General's Bulletin "[Special Measures for Protection from Sexual Exploitation and Abuse](#)" (ST/SGB/2003/13) has introduced the following standard definition for sexual exploitation and abuse, which applies to any sector and context⁴:

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

Within the general definitions introduced by the United Nations, the Foundation adopts the following additional definitions:

SEA: acronym for Sexual Exploitation and Abuse

Beneficiary: Any individual who, as part of an ST Foundation project, receives goods or services free of charge or is otherwise the recipient of activities and results geared toward it.

Partner: Organizations and social groups that promote, fund, and/or implement activities in cooperation with the Foundation.

Victim: Anyone who has been subjected to acts of sexual exploitation or abuse by persons associated in any capacity with the ST Foundation.

Claimant: The person who initially notifies ST Foundation or its Partners about an allegation of sexual exploitation and abuse.

Whistleblower: A collaborator of ST Foundation or of its Partners who, having become aware of any of the conduct covered by this Policy on the part of another person working in any capacity with ST Foundation, reports the fact.

Sexual harassment: Repeated, unwanted, and unacceptable conduct and practices of a sexual nature, including invitations, demands, requests for sexual favors, verbal or physical conduct, or gestures that might reasonably be perceived as offensive or humiliating.

⁴ Regarding the definition of SEA, it is important to distinguish between SEA and sexual harassment. In both cases, sexual misconduct is perpetrated by UN agency staff or their partners. However, SEA victims are beneficiaries or community members, while victims of sexual harassment are staff of UN agencies or partners themselves. This Policy covers SEA only. For sexual misconduct involving UN agency staff or their partners as victims, see [SG Bulletin on Prohibition of discrimination, harassment, including sexual harassment, and abuse of authority \(ST/SGB/2008/5\)](#).

Moral harassment: Repeated hostile behavior directed against an individual, with physically or psychologically persecutory intent, protracted and systematic, likely to create an environment that is disrespectful, humiliating, or detrimental to the person's psychophysical integrity or dignity.

Gender-Based Violence (GBV): generic term for direct or disproportionate violence toward someone because of their actual or perceived gender identity. Sexual exploitation and abuse are a kind of GBV.

Online abuse: Exploitation or abuse carried out through the use of information and communication technology (e.g., e-mail, texts, social media, communication apps).

6. AREAS OF OPERATION

1. Prevention

a) Human Resources

Working with the ST Foundation requires that the Board of Directors, staff, consultants, volunteers, interns, and all those acting in any capacity on its behalf, accept this PSEA by signing a commitment to abide by its principles and procedures (Annex 3).

ST Foundation, with specific reference to the selection of human resources, adopts the following preventive measures (Annex 7):

- Staff, consultants, volunteers, and interns are recruited through selection notices that contain a clear description of the job to be performed, the organizational role, and the assumption of responsibility related to compliance with and implementation of this PSEA as well as the relevant Code of Conduct and other adopted policies.
- A portion of the candidate's recruitment or eligibility interview is devoted to explaining the ST Foundation's Policies, including the PSEA, and verifying the candidate's understanding of the importance to the ST Foundation of the proper implementation of these policies.
- The candidate deemed eligible, before starting to work with the ST Foundation, must sign, under his or her sole responsibility, a self-certification attesting to his or her criminal convictions, if any, and knowledge or lack of pending charges for crimes against the individual.

ST Foundation is empowered to sanction, with both conservative and expulsive disciplinary measures, conduct by its human resources in violation of this Policy.

b) Training and awareness-raising

ST Foundation considers training and awareness-raising to be essential elements in the implementation of its Policy. This priority implies that:

- The Board of Directors, staff, consultants, volunteers, and interns receive training on this Policy, the PSEA Code of Conduct, and related procedures at the time of induction or during the introductory period.

The training also concerns the behavior to be adopted and will be given in a targeted manner according to the respective roles based on the Organizational Chart related to this Policy.

In this way, in the event of abuse occurring, the human resources involved in the specific ST Foundation Project are enabled to promptly activate effective forms of support for victims.

Training activities will be conducted according to an annual training plan that identifies general objectives (Annex 8). Individual sessions are organized based on an agenda that identifies specific contents (Annexes 9-10).

ST Foundation has prepared a set of communication materials that enable employees in any capacity, beneficiaries, including minors, and local communities to know their rights under PSEA, learn about reporting procedures, and how to activate them (Annex 11).

ST Foundation has a targeted PSEA awareness plan, depending on the local context and target audience, which uses the above communication materials in a way that best reaches the target audience by adapting messages and other communication tools as appropriate (Annex 12).

Names and contact details of key figures in the internal organization will be clearly displayed in the ST Foundation's PSEA documentation, and all human resources are made aware of them from the outset.

c) Internal organization

The Board of Directors is responsible for overseeing and ensuring the implementation of the Policy.

ST Foundation identifies the following individuals to whom it assigns a key role in the implementation of this Policy.

Steering committee against sexual exploitation and abuse (SEA Steering Committee)

It is formed by the Contact Person against Sexual Exploitation and Abuse, two members of the Board of Directors, and any external consultants and experts.

- Maintains a high level of knowledge and update on internationally adopted child protection standards and practices.
- Oversees human resource training and any other prevention and response processes or activities related to this PSEA.
- Sees to the periodic updating of the Policy and related documentation.
- Promotes the conduct of investigative activities and oversees them.

It meets at least once a year at the call of the Contact Person against Sexual Exploitation and Abuse to take stock of the implementation of the PSEA and the progress of local situations and any reports.

It can also be convened on an emergency basis if there are particularly critical situations that require prior discussion on the decision to be made.

In case of need, it summons the local coordinators and asks them to account for the situation in their area of responsibility.

Contact Person against Sexual Exploitation and Abuse (SEA Officer)

This is the figure, identified by the Board of Directors to operate at the central level, which carries out the following functions:

- Promotes awareness and implementation of this PSEA throughout the organization and liaises with the Steering Committee and Board of Directors.
- Ensures that all staff sign the commitment to comply with the PSEA policy and its Code of Conduct and maintains its records.
- Sets the plan for staff training and awareness on PSEA and shares it with the Focal Points.
- Verifies that there is a condition in contracts and partnership agreements concerning the obligation to comply with the PSEA.
- Serves as a reference and source of qualified information for human resources regarding this PSEA, also during investigations.
- Receives and evaluates reports forwarded to it by the Focal Point or received directly; directs and supervises the work of the Focal Point.
- Always informs the Steering Committee about the reports received and, if necessary, convenes it even urgently.

Local Coordinator against Sexual Exploitation and Abuse (SEA Focal Point)

This is the figure identified by the SEA Officer after consultation with the Board of Directors, who operates at the peripheral level. The SEA Focal Point has specific knowledge of the applicable local legislation on sexual exploitation and abuse using experts when necessary.

Because of the key role played by the SEA Focal Points, ST Foundation has prepared specific terms of reference (Annex 5) for them, meaning the specific instructions that are given to them on how to behave in carrying out their duties.

2. Response

a) Reporting

Please note that the ST Foundation, due to its organizational and operational characteristics, carries out its institutional activities in both European and non-European countries, which have different social, economic, and regulatory contexts.

Rules of conduct and abuse prevention rules are general in nature, while further differentiation could be provided based on the specific local context if the risk of abuse is higher.

The following procedures should therefore be adopted locally and provided for in the MOU signed by the Partner to make the ST Foundation capable of responding promptly in case of abusive behavior.

If the project is carried out in partnership, the ST Foundation and the Partner will identify the ST Foundation's SEA Focal Point and a possible Contact Person for the Partner that can be contacted by those who need to make a report.

Reporting rules

Anyone who believes they have been abused or has a suspicion or evidence that sexual exploitation or abuse has been perpetrated or attempted may make a report. The report should be handled according to the following principles:

- Safety, by reducing as much as possible any kind of risk for all persons involved in the reporting and for the preservation of related documentation.
- Confidentiality, by reducing the number of people involved in the handling of reports as much as possible and by possibly separating the data of the people involved, which could lead to their recognition, from the report documents. The possibility of making anonymous reports is guaranteed as long as they relate to facts of particular gravity and have very detailed content in order to highlight specific facts and situations in a given context.
- Transparency, by requesting and obtaining the consent of the reporter and explaining to the reporter what information will be shared and for what purposes. Consent will not be required for those who have adhered as a contributor in any capacity to the ST Foundation, to their obligations under this Policy, having hereby committed to informing the SEA Focal Point if they have concerns about risk or occurrence of exploitation or abuse.
- Accessibility, by making reporting rules easy to use by eliminating potential barriers to access to them, such as foreign language, costs and time to use them, and customizing them on the basis of the target (age, sex, different educational background, skills, etc.).

In any case, any exploitation or abuse, whether suspected or confirmed, must be seriously evaluated regardless of who makes the report and who the person reported is.

Reporting procedure

In the case of suspicion:

If an associate in any capacity of ST Foundation witnesses abuse or exploitation, suspects it, or receives a report, he/she shall immediately inform the SEA Focal Point; if the suspect is the SEA Focal Point itself, the reporter shall immediately notify the SEA Officer who shall proceed on his/her behalf.

The associate who does not report is liable to disciplinary sanctions.

Upon receipt of the report from an associate or through all other established channels, the SEA Focal Point, in consultation with the SEA Officer, will consider whether:

- 1) the risk is internal to ST Foundation or one of its Partners;
- 2) the risk is external.

- 1) If the risk is internal, the SEA Focal Point will activate this procedure by highlighting whether the same is due to the way the activity has been organized or not and filling out the relevant reporting form;
- 2) if the risk is external to the organization the SEA Focal Point, in consultation with the SEA Officer, will proceed according to the following point c).

SEA Focal Points will take all necessary steps to:

- Ensure the protection and confidentiality of the person who discovered the abuse.
- Avoid any contact between the person accused of abuse and the alleged victim.
- Protect the alleged victim and give him/her all the support he/she needs immediately (psychological, medical, legal).
- Make a verbatim record of the reporter's account and complete the Report of Event form (if possible, the Report should be accompanied by the recording of the testimony).
- Throughout the procedure, the interest of the alleged victim should always be considered paramount.

The procedure described here is of a general nature and is supplemented by the description of the reporting mechanisms that apply depending on who makes the report (Annexes 13,14,15).

To tailor the reporting process to each context, specific procedures may be defined and agreed upon by ST Foundation staff on the ground together with the Partner. These procedures will, therefore, be officially included in the respective MOUs.

b) Investigation

The SEA Officer is responsible for investigating complaints regarding SEA's acts and manages the reporting procedure in collaboration with the Focal Point taking care of the keeping of a register of reports (Annex 16).

ST Foundation ensures that beneficiaries and community members know about the existence of this Policy, how to report SEA incidents, and the type of assistance that can be offered. Potential or actual SEA victims must be adequately informed about how the reporting mechanism works and who the contact persons are. Individuals reporting SEA cases and victims should receive information from the SEA Officer and/or SEA Focal Point on the development and conclusion of their cases.

The SEA Officer decides whether the investigation procedure should be entrusted to a qualified external supplier to carry out the investigations on the basis of the provisions of Annexes 20,21,22,23.

Investigation actions are conducted by the external supplier and coordinated with the consequent activities of SEA Officer and Focal Point and may include:

1. Gather factual information and documentation and evaluate any other items to be acquired, including testimonials.
 2. Carry out an internal investigation, including information gathered from witnesses.
 3. Temporarily suspend from his/her activities the person who is the subject of the complaint or discontinue, in the most serious cases and if these activities concern projects with vulnerable people, the collaborative relationship with the entity to which he/she belongs, during the period of the investigation.
 4. Inform the concerned person about complaints regarding him or her.
 5. Give the suspected person an opportunity to present his or her side of the story, before any decision of guilt or innocence is reached.
 6. Ensure the protection of the victim and the reporter and assist the victim of sexual exploitation or abuse according to item d) below.
 7. Ensure that the person who made the report is informed about the procedure initiated.
 8. Upon completion of the investigation, analyze the evidence collected and the entire case file; decide on any disciplinary sanctions or other consequential measures or whether the report should be dismissed.
- All individuals to whom this PSEA applies must report abuse and no form of coercion, intimidation, or revenge is tolerated against them, including when providing information or assistance during an investigation.

c) Reporting to the authorities

If the report is not filed, the SEA Focal Point will have to decide whether it is also necessary to refer the matter to the national authorities; in this case, with the supervision of the SEA Officer, he/she will file the report with the competent authority and follow up the developments by acting accordingly.

Under no circumstances may the SEA Focal Point proceed with filing the report without the SEA Officer's express permission.

If deemed appropriate, ST Foundation ensures that it will report the findings to the relevant authorities according to applicable law while also considering initiating proceedings as an aggrieved plaintiff.

ST Foundation may choose not to report a case to local law enforcement if it believes that the local context or country governance or legal structures are not strong enough to protect the victim and others involved in the case or even endanger them. In this case the decision is taken by the Steering Committee, after consulting the SEA Officer and the Focal Point.

Considerations on whether or not to report to domestic law enforcement include the nature of the complaint, the victim's willingness and ability to give informed consent, and concerns about legal proceedings in that particular country.

In those cases where the ST Foundation decides not to report to local authorities, the Foundation should consult a lawyer and retain documentation and evidence to support the decision made.

d) Assistance to the victims

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

- Safety
- Medical assistance
- Psychosocial support
- Legal assistance
- Material assistance

ST Foundation 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."

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, ST Foundation takes all necessary measures to assist the victim and provide social, health care, and psychological support.

More details on the assistance provided to victims, local providers, and the reporting process are provided in the Annexes 17,18,19.

3. Agreements with partners

a) Collaboration requirements

Any External Partner cooperating with the ST Foundation in organizing Projects must have its own PSEA Policy and commit to the zero-tolerance policy.

In working with Partners, ST Foundation requires compliance with the following assurance procedures (Annex 6):

- Ensure, prior to the signing of a contract or partnership agreement, that the Partner adheres to the commitment to zero tolerance towards sexual exploitation and abuse and has a policy that complies with the Minimum Operating Standards on PSEA developed by IASC.
- Include in cooperation agreements the parties' mutual commitment to comply with what is outlined in the SG Bulletin (ST/SGB/2003/13) and their own codes of conduct.
- Indicate in the partnership or cooperation agreement that violation of the PSEA Policy may result in termination of the agreement.

b) PSEA violation and agreement termination risk

In the case of a report involving personnel collaborating with the Partner, ST Foundation makes an assessment of the criticality specific to each situation and decides to continue the collaboration or not, taking into account the nature and gravity of the event, the Partner's reaction and commitment to addressing and managing the incident.

If the Partner demonstrates that it is able to manage the event effectively and keeps ST Foundation up to date, the latter may decide not to apply its own procedures for the sole purpose of avoiding duplication, verifying in particular that the necessary assistance is provided to the victims.

Upon completion of the assessment and depending on the gravity of the incident and management by the Partner, ST Foundation may go so far as to terminate the collaboration agreement.

7. ANNEXES

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