



CENTRE FOR DEVELOPMENT IN SOCIAL JUSTICE (CDSJ)

PREVENTION OF SEXUAL EXPLOITATION, ABUSE AND HARASSMENT (PSEAH) POLICY



1. Title

This instrument shall be known as the **CDSJ Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy**.

2. Effective Date

This Policy takes effect on the date of approval by the competent governance authority of CDSJ and remains in force until amended or repealed.

3. Purpose

This Policy sets the rules for preventing, reporting, receiving, recording, responding to, investigating, managing, sanctioning, and monitoring sexual exploitation, sexual abuse, and sexual harassment in all CDSJ workplaces, programmes, partnerships, community engagements, events, travel contexts, digital spaces, and operational relationships.

This Policy is adopted because sexual exploitation, abuse, and harassment are serious violations of dignity, safety, equality, trust, and institutional integrity. They also expose CDSJ to major legal, safeguarding, donor, reputational, and programme risks. In community-facing work, these risks are even more serious because CDSJ staff, volunteers, consultants, and partners may hold power over people seeking services, referrals, support, resources, jobs, opportunities, or protection. This Policy therefore makes clear that sexual misconduct linked to power, dependency, access, opportunity, or institutional position is prohibited in every form, whether it happens inside the workplace or in external programme settings.

4. Application

This Policy applies to:

- a. all CDSJ governance members;
- b. all staff, whether permanent, temporary, fixed-term, seconded, or part-time;
- c. all interns, fellows, volunteers, consultants, associates, contractors, and other associated personnel;
- d. all applicants for employment, consultancy, volunteer placement, fellowship, internship, or governance-linked engagement where the conduct arises in a CDSJ-controlled process;
- e. all partners, sub-grantees, consortium members, suppliers, service providers, and implementing actors where PSEAH obligations are included in agreements, grant conditions, codes of conduct, or partnership terms; and
- f. all CDSJ offices, branches, future country operations, field sites, workshops, meetings, vehicles, accommodation spaces, programme venues, digital platforms, and online workspaces used for CDSJ work.

This Policy applies to conduct occurring:

- a. in the workplace;
- b. during work-related travel;
- c. during programme implementation or community engagement;
- d. during meetings, training, consultations, referrals, and events;
- e. through digital or online communication linked to CDSJ work; and
- f. outside formal work hours where the conduct is connected to CDSJ work, representation, authority, supervision, opportunity, programme access, or institutional influence.

5. Policy Statement

CDSJ has zero tolerance for sexual exploitation, sexual abuse, and sexual harassment.

No person covered by this Policy may:

- a. sexually exploit another person;
- b. sexually abuse another person;
- c. sexually harass another person;
- d. request, pressure, manipulate, or coerce sexual access or sexual cooperation in exchange for employment, support, protection, payment, contract opportunity, programme access, referral, transport, accommodation, or any other benefit;
- e. use CDSJ authority, resources, access, information, or influence to obtain sexual access or silence;
- f. retaliate against a complainant, witness, or reporting person; or
- g. conceal, minimise, privately settle, or excuse PSEAH misconduct.

Every PSEAH concern must be reported immediately, recorded properly, handled confidentially, and responded to through a survivor-centred, fair, and accountable process.

6. Definitions

For purposes of this Policy:

Sexual Exploitation means any actual or attempted abuse of a position of vulnerability, differential power, trust, dependency, or authority for sexual purposes, including profiting monetarily, socially, politically, professionally, or otherwise from the sexual exploitation of another person.

Sexual Abuse means actual or threatened physical intrusion of a sexual nature, whether by force, under unequal or coercive conditions, or otherwise without valid consent.

Sexual Harassment means any unwelcome sexual conduct, request, communication, gesture, attention, comment, pressure, or sexualised behaviour that violates dignity, creates a hostile or humiliating environment, or is linked to power or consequences.

Survivor means a person who has experienced sexual exploitation, abuse, or harassment. The word may be used even where a formal finding has not yet been made, where this is appropriate to a survivor-centred response.

PSEAH Concern means any allegation, report, suspicion, disclosure, observation, complaint, or evidence indicating possible sexual exploitation, abuse, or harassment.

Child means any person below the age of 18 years, unless a stricter protective standard applies by law.

7. Zero-Tolerance Conduct Rules

The following conduct is strictly prohibited:

- a. sexual activity with a child in any circumstance;
- b. exchanging money, jobs, contracts, allowances, referrals, grants, goods, transport, accommodation, or any institutional benefit for sexual access, sexual activity, sexual favour, silence, or continued contact;
- c. taking advantage of a person's vulnerability, poverty, distress, displacement, dependency, disability, need for services, or fear of losing opportunity in order to obtain sexual access;
- d. coercive, manipulative, or intimidating sexual conduct;
- e. sexual touching, assault, forced kissing, grabbing, blocking movement, or physical intrusion of a sexual nature;

- f. sexualised communication that is unwelcome, coercive, exploitative, threatening, or linked to CDSJ power;
- g. sexual jokes, sexual comments, sexual rumours, or sexualised humiliation in work-related settings;
- h. retaliation against a person for refusing sexual conduct or reporting PSEAH misconduct;
- i. concealing a PSEAH report or interfering with a PSEAH process; and
- j. any other conduct that falls within sexual exploitation, abuse, or harassment under this Policy.

8. Special Rule on Exchange of Benefit for Sexual Access

No CDSJ governance member, staff member, volunteer, consultant, partner representative, or other covered person may offer, imply, suggest, or provide any of the following in exchange for sexual access or sexual cooperation:

- a. employment or contract opportunity;
- b. recommendation or promotion;
- c. renewal of engagement;
- d. programme enrolment or service priority;
- e. referral to a service or support provider;
- f. training opportunity, workshop place, or travel opportunity;
- g. grant, sub-grant, stipend, or payment;
- h. transport, food, accommodation, airtime, cash, or other material benefit; or
- i. protection from criticism, discipline, exclusion, or other negative consequence.

This is prohibited whether the exchange is stated openly or implied indirectly. It is also prohibited whether the other person appears to agree or not, because the existence of institutional power, dependency, or vulnerability may make real refusal impossible or unsafe.

9. Special Rule on Children

Any sexual conduct, sexual communication, sexual attention, grooming, exploitative messaging, sexual touching, or exchange-based interaction involving a child is prohibited absolutely.

Any PSEAH matter involving a child must be handled immediately under this Policy, the Child Protection Policy, and the Safeguarding Policy together. Such a matter may also require immediate external reporting to the appropriate authority.

10. Special Rule on Beneficiaries, Participants, and Adults at Risk

Where CDSJ works with community members, survivors, beneficiaries, participants, applicants, or adults at risk, every covered person must recognise that power may exist even where no formal employment relationship exists.

A person may not rely on the appearance of consent where:

- a. the other person depends on CDSJ for support, referral, service, livelihood connection, programme access, or protection;
- b. the other person is in distress, crisis, displacement, or survival need;

- c. the covered person holds influence over access to opportunity; or
- d. the relationship arose directly through CDSJ work and contains a clear power imbalance.

11. Duties of All Covered Persons

All persons covered by this Policy must:

- a. read and comply with this Policy;
- b. maintain professional sexual boundaries in all CDSJ-related interactions;
- c. avoid sexualised conduct in work-related settings;
- d. report all PSEAH concerns immediately;
- e. preserve confidentiality;
- f. not attempt to suppress, negotiate away, or privately settle a PSEAH matter;
- g. cooperate with investigation, referral, and protective measures; and
- h. complete required PSEAH induction and refresher training.

A person who is unsure whether conduct amounts to PSEAH must still report it. Delay increases harm and exposes CDSJ to further risk.

12. Duties of Managers and Supervisors

Managers and supervisors must:

- a. set and enforce professional behavioural boundaries in their teams;
- b. not tolerate sexualised workplace or programme cultures;
- c. receive and route PSEAH concerns immediately;
- d. take same-day action where immediate protection is needed;
- e. not attempt to informally settle serious PSEAH matters;
- f. protect complainants and witnesses from retaliation; and
- g. cooperate with case handling, suspension decisions, and evidence preservation.

A manager who receives a PSEAH concern and delays reporting breaches this Policy.

13. PSEAH Focal Point

CDSJ shall designate at least one **PSEAH Focal Point**, or where operationally appropriate, designate a clear coordination arrangement between the Safeguarding Focal Point, HR focal point, and leadership.

The PSEAH Focal Point shall:

- a. receive and log PSEAH concerns;
- b. classify the concern as sexual exploitation, sexual abuse, sexual harassment, or overlapping category;
- c. advise on immediate protection measures;
- d. coordinate safe routing to investigation, safeguarding, child protection, disciplinary, or external referral processes;
- e. maintain the PSEAH case register;
- f. track timelines and case status; and
- g. report serious incidents and patterns to Executive Management and governance oversight where required.

If the designated focal point is implicated, the matter must be reported directly to the appropriate Co-Executive Director or the Chairperson, depending on who is implicated.

14. Who May Receive a PSEAH Report

A PSEAH concern may be reported to:

- a. the PSEAH Focal Point;
- b. the Safeguarding Focal Point;
- c. the HR focal point or designated complaints focal point;
- d. the immediate line manager, where safe and appropriate;
- e. the next-level manager where the line manager is implicated or unavailable;
- f. the Co-Executive Director – Operations and Technical Services;
- g. the Co-Executive Director – Programmes and Partnerships;
- h. the Chairperson or designated governance authority where senior leadership or governance actors are implicated; or
- i. an external authority, support provider, or emergency service where immediate safety or legal reporting requires it.

Where a report is received by someone who is not the correct handler, that person must route it immediately and not later than the same working day.

15. Form of Report

A PSEAH report may be made:

- a. in writing;
- b. verbally;
- c. by email;
- d. through a complaint form;
- e. through a hotline or approved reporting channel where available; or
- f. anonymously.

A report should include, where known:

- a. who is affected;
- b. who is alleged to have done what;
- c. what happened;
- d. when and where it happened;
- e. whether there is immediate risk; and
- f. whether any messages, witnesses, or other evidence exist.

A report may not be rejected because the reporter does not know the correct label, does not have all evidence, or reports emotionally.

16. Immediate Reporting Rule

Every PSEAH concern must be reported on the **same working day** that it is received, observed, or suspected. Where the report is made after hours and there is immediate safety risk, the receiving person must activate the available emergency route immediately and complete formal written recording on the next working day.

17. First Response to a PSEAH Disclosure

The first person receiving a disclosure must:

- a. listen respectfully and calmly;
- b. take the disclosure seriously;
- c. avoid blaming questions;
- d. not promise absolute secrecy;
- e. explain that the concern must be shared with those who can protect and respond;
- f. record the basic facts as soon as possible; and
- g. route the matter immediately to the correct authority.

The first response is not an investigation. It is a protection, dignity, and escalation step.

18. Minimum Information to Record

The receiving officer or focal point must record at least:

- a. date and time of report;
- b. name of reporter, if known;
- c. name of affected person, if known;
- d. name of alleged respondent, if known;
- e. type of concern as first understood;
- f. short description of what was reported or observed;
- g. immediate risk identified; and
- h. immediate action taken.

If some facts are not known, the report must still be logged.

19. Immediate Risk Classification

Every PSEAH report must be classified within **1 working day** as:

- a. **Critical** – immediate danger, child sexual abuse concern, ongoing sexual assault, severe coercion, or urgent safety threat;
- b. **High** – credible serious PSEAH allegation requiring urgent protective action and formal handling;
- c. **Moderate** – concern requiring structured inquiry and case management; or
- d. **Low** – lower-level concern requiring review, monitoring, or corrective action.

Critical and High-risk matters must be escalated to Executive Management immediately.

20. Immediate Protective Measures

Where necessary, CDSJ must act without delay to protect the complainant, survivor, child, witness, or other affected person.

Protective measures may include:

- a. no-contact instruction;
- b. temporary separation of the parties;
- c. temporary reporting-line change;
- d. removal of the respondent from field, supervisory, or beneficiary-contact duties;
- e. precautionary suspension;
- f. referral to medical, psychosocial, legal, or protective services;
- g. emergency transport or safe accommodation support where appropriate; and
- h. preservation of evidence and communication records.

Protective action must not wait for full investigation where immediate risk exists.

21. Survivor-Centred Handling

Every PSEAH matter must be handled in a survivor-centred manner. This means:

- a. taking the report seriously;
- b. respecting the dignity of the affected person;
- c. minimising repeated retelling of traumatic events;
- d. protecting confidentiality;
- e. avoiding blame, judgement, or disbelief language;
- f. informing the person of available support and reporting options; and
- g. prioritising safety and choice where legally and operationally possible.

A survivor-centred approach does not prevent fair investigation. It ensures that the process itself does not create further harm.

22. Referral to External Services and Authorities

Where a PSEAH concern involves possible criminal conduct, immediate danger, child abuse, sexual assault, trafficking, coercion, or another matter requiring external response, CDSJ must make or facilitate referral to the appropriate authority or support service without delay.

This may include:

- a. police;
- b. child protection authority;
- c. social worker;
- d. health facility;
- e. psychosocial support provider;
- f. legal service provider; or
- g. other competent statutory authority.

The case file must record what referral was made, when, to whom, and by whom.

23. Internal Case Handling

23.1 Case Opening

Every PSEAH concern that is not clearly unrelated must be opened as a PSEAH case file.

23.2 Assignment

The PSEAH Focal Point, together with the appropriate Co-Executive Director, must determine whether the matter requires:

- a. safeguarding response;
- b. child protection response;
- c. formal investigation;
- d. disciplinary referral;
- e. external referral; or
- f. combined handling.

23.3 Initial Response Plan

A written response plan must be set within **2 working days** of case opening.

23.4 Investigation

Where formal internal investigation is required, it must be assigned to a person who is not conflicted and who understands the sensitivity of PSEAH cases.

23.5 Timeline

A formal PSEAH investigation should ordinarily be completed within **15 working days** of assignment. Where more time is needed, the reason must be recorded and the parties informed where appropriate.

24. Confidentiality Rules

PSEAH case information must be shared only on a need-to-know basis.

No person may:

- a. circulate details casually;
- b. expose the complainant or survivor to gossip;
- c. share case details in group chats, informal meetings, or public spaces; or
- d. disclose identifying information beyond what is operationally necessary.

Confidentiality does not prevent reporting to authorities, investigators, decision-makers, or support providers where necessary.

25. Formal Outcome Categories

A PSEAH case may conclude as:

- a. referred externally and monitored internally;
- b. internally substantiated;
- c. partly substantiated;
- d. not substantiated;
- e. unresolved due to insufficient information;
- f. closed after urgent protection and referral; or
- g. escalated for disciplinary, contractual, governance, partner, or legal action.

The outcome and reasons must be recorded in writing.

26. Disciplinary, Contractual, and Governance Consequences

Where PSEAH misconduct is substantiated, CDSJ may take one or more of the following actions:

- a. written warning, where the conduct is at the lower end and does not involve exploitation, abuse, coercion, or serious harassment;
- b. final written warning;
- c. removal from supervisory, field, or community-contact duties;
- d. suspension;
- e. dismissal or termination of engagement;
- f. termination of consultancy, volunteer placement, contract, or partner relationship;
- g. governance action where the respondent is a governance member;
- h. supplier or partner exclusion; and
- i. referral to law enforcement or other competent authority.

Sexual exploitation, sexual abuse, child-related sexual misconduct, coercive sexual conduct, or serious abuse of power will ordinarily be treated as serious misconduct or gross misconduct.

27. Retaliation Prohibited

No person may retaliate against:

- a. a complainant;
- b. a survivor;
- c. a witness;
- d. a support person;
- e. a reporter; or
- f. a case handler.

Retaliation includes:

- a. threats;
- b. hostile treatment;
- c. denial of opportunity;
- d. negative performance action linked to the report;
- e. intimidation to withdraw;
- f. rumours or humiliation; and
- g. any other adverse action linked to reporting or cooperation.

Retaliation is a separate serious breach and may itself result in disciplinary or contractual sanction.

28. False or Malicious Reports

A report that is not substantiated is not automatically false.

However, where it is established that a person knowingly fabricated a PSEAH allegation or forged evidence maliciously, that conduct may be referred for disciplinary action.

This rule must never be used to discourage or threaten good-faith reporting.

29. Partner and Contractor Obligations

Any partner, sub-grantee, consortium member, consultant firm, supplier, or service provider bound by a CDSJ agreement must comply with the PSEAH obligations included in that agreement.

At minimum, such parties must:

- a. report serious PSEAH concerns involving CDSJ-supported activity immediately;
- b. cooperate with case handling and referrals;
- c. not retaliate against reporters; and
- d. take corrective action where misconduct by their personnel is established.

CDSJ may suspend or terminate the relationship where serious PSEAH breaches occur and are not credibly addressed.

30. Training and Acknowledgment

All staff and associated personnel must receive PSEAH orientation during induction.

Child-facing staff, community-facing staff, programme staff, safeguarding-related staff, and managers must receive refresher PSEAH training periodically.

All covered persons must sign acknowledgment that they have read and understood this Policy, the Code of Conduct, and the relevant reporting duties.

31. Time Requirements

The following minimum timelines apply:

- a. same-day reporting of PSEAH concern;
- b. same-day routing to correct authority;
- c. risk classification within **1 working day**;
- d. response plan within **2 working days**;
- e. urgent protective action without delay;
- f. formal investigation ordinarily within **15 working days**; and
- g. outcome communication within **5 working days** of final internal decision, subject to lawful confidentiality limits.

Where a timeline cannot be met, the reason must be recorded.

32. Records and Case Register

The PSEAH Focal Point must maintain:

- a. a secure PSEAH Case Register; and
- b. a secure file for each case.

The register must include at least:

- a. case reference number;
- b. date received;
- c. complaint category;
- d. immediate risk level;
- e. whether a child is involved;
- f. referral status;
- g. current case handler; and
- h. case status.

Access to these records must be strictly restricted.

33. Non-Compliance with this Policy

Non-compliance with this Policy includes:

- a. failure to report a PSEAH concern;
- b. delay in reporting;
- c. concealment of a complaint;
- d. retaliation;
- e. interference with witnesses or evidence;
- f. misuse of institutional power for sexual purposes;
- g. unauthorised disclosure of case information; or
- h. failure to implement required protective measures.

Any such non-compliance may result in disciplinary action, governance action, contract termination, partner sanction, or legal referral.

34. Country Operations Clause

This Policy applies across all CDSJ operations.

Where a country of operation requires additional sexual offences reporting, labour, child protection, safeguarding, evidence, victim protection, or mandatory referral procedures, CDSJ shall issue a country annex. The annex may add requirements but may not reduce the minimum protection, reporting, and accountability standards in this Policy unless mandatory local law requires a different formulation.

35. Related Instruments

This Policy shall be read together with:

- the Constitution of CDSJ;
- the CDSJ Policy Framework;
- the Board Governance and Oversight Charter;
- Code of Conduct and Ethics Policy;
- Human Rights Policy;
- Safeguarding Policy;
- Child Protection Policy;
- Sexual Harassment Policy;
- Whistleblower Protection Policy;
- Grievance and Complaints Handling Policy;
- Disciplinary Policy;
- Records Management and Document Retention Policy;
- Data Protection, Privacy, and Confidentiality Policy; and
- any approved PSEAH reporting forms, registers, referral maps, training records, or country annexes.

36. Review

This Policy must be reviewed at least once every three years, or earlier if required by legal change, serious incident, donor requirement, governance direction, repeated complaint pattern, or country expansion.

37. Approval

Approved by: Adv. Motlatsi J Mofolo
Approving Authority: Director and Boards Ex-Officio
Date of Approval: 10 February 2026
Effective Date: 1st March 2026

Version: 1.0

ANNEX 1 CDSJ PSEAH INCIDENT / REPORT FORM

Instruction: Use this form to report any concern, allegation, disclosure, suspicion, or observation relating to sexual exploitation, sexual abuse, or sexual harassment connected to CDSJ work. This form may be completed by the complainant, witness, first recipient, focal point, or reporting officer. If the report is made verbally, the receiving officer must complete this form as soon as possible.

Field	Details
PSEAH Report Reference No.	_____
Date Reported	_____
Time Reported	_____
Received By	_____
Position / Role	_____
Reporting Channel	☐ In Person ☐ Phone ☐ Email ☐ Written Complaint ☐ Third-Party Report ☐ Anonymous ☐ Other: _____

A. Person Making the Report

Field	Details
Name of Reporter (if known)	_____
Contact Details	_____
Reporter Type	☐ Survivor / Complainant ☐ Witness ☐ Staff Member ☐ Manager ☐ Partner ☐ Community Member ☐ Other: _____
Does the reporter want confidentiality?	☐ Yes ☐ No
Is the report anonymous?	☐ Yes ☐ No

B. Person Affected

Field	Details
Name of Affected Person (if known)	_____
Sex / Gender (if known and relevant)	_____
Approximate Age / Age Category	_____
Is the affected person a child?	☐ Yes ☐ No ☐ Unknown
Is the affected person a staff member / participant / community member / beneficiary / other?	_____
Contact Details (if safe and known)	_____

C. Person Alleged to Have Caused Harm

Field	Details
Name of Respondent / Alleged Perpetrator (if known)	_____



Relationship to CDSJ	☐ Staff ☐ Board Member ☐ Consultant ☐ Volunteer ☐ Partner Personnel ☐ Supplier / Contractor ☐ Community Member ☐ Unknown
Position / Role (if known)	_____
Contact Details (if known)	_____

D. Nature of Concern

Concern Type	Tick
Sexual Exploitation	☐
Sexual Abuse	☐
Sexual Harassment	☐
Child-related sexual concern	☐
Attempted misconduct / grooming / coercion	☐
Retaliation linked to refusal or reporting	☐
Other related concern	☐

E. Incident Details

Field	Details
Date / Period of Incident	_____
Time (if known)	_____
Location / Setting	_____
What happened?	_____
Was there any use of power, threat, pressure, exchange of benefit, or dependency?	☐ Yes ☐ No ☐ Unknown
If yes, explain briefly	_____
Were there any witnesses?	☐ Yes ☐ No ☐ Unknown
If yes, list names if known	_____

F. Immediate Risk and Safety

Field	Details
Is the affected person in immediate danger?	☐ Yes ☐ No ☐ Unknown
Is urgent medical attention needed?	☐ Yes ☐ No ☐ Unknown
Is urgent safeguarding / child protection action needed?	☐ Yes ☐ No ☐ Unknown
Has the respondent had further contact with the affected person?	☐ Yes ☐ No ☐ Unknown
Immediate safety concerns noted	_____

G. Evidence / Documents / Information Available

Available	Item
☐	Messages / emails / screenshots

☐	Photo / video / audio
☐	Witness information
☐	Medical / support information
☐	Prior complaint / report
☐	Other: _____

H. Immediate Action Taken by First Recipient

Field	Details
Was the matter escalated the same day?	☐ Yes ☐ No
Was the PSEAH / Safeguarding Focal Point informed?	☐ Yes ☐ No
Was emergency referral made?	☐ Yes ☐ No
Was immediate protection action taken?	☐ Yes ☐ No
Describe action taken	_____

I. Reporting Declaration

Field	Details
I confirm that this report records the concern as raised or observed, to the best of my knowledge.	
Name of Person Completing Form	_____
Signature	_____
Date	_____

Mandatory Rule

This form must be completed **on the same working day** that a PSEAH concern is received, observed, or disclosed.

Control Note

This is the first capture form. Its purpose is to record the concern quickly, preserve essential facts, identify immediate risk, and trigger same-day escalation. It is not the full investigation form and should not be used to conduct lengthy questioning. Where the affected person is a child or is in immediate danger, protection and referral come first.

ANNEX 2

CDSJ PSEAH CASE INTAKE AND INITIAL RISK ASSESSMENT FORM

Instruction: Use this form after receipt of a PSEAH report to assess the nature of the concern, immediate risk, required protection steps, referral needs, and next case pathway. This form must be completed by the PSEAH Focal Point or designated case handler within **1 working day** of receipt of the report.

Field	Details
PSEAH Case Reference No.	
Related Incident / Report Form Ref. No.	
Date of Intake	
Case Handler / Focal Point	
Position	

A. Case Type Screening

Question	Response
Does the case involve sexual exploitation?	☐ Yes ☐ No ☐ Unclear
Does the case involve sexual abuse?	☐ Yes ☐ No ☐ Unclear
Does the case involve sexual harassment?	☐ Yes ☐ No ☐ Unclear
Does the case involve a child?	☐ Yes ☐ No ☐ Unclear
Does the case also require safeguarding action?	☐ Yes ☐ No
Does the case also require child protection action?	☐ Yes ☐ No
Does the case appear to require external referral?	☐ Yes ☐ No ☐ Unclear

B. Immediate Risk Assessment

Risk Area	Assessment	Comments
Immediate physical safety risk	☐ High ☐ Medium ☐ Low ☐ Unknown	
Risk of further contact / repeat harm	☐ High ☐ Medium ☐ Low ☐ Unknown	
Risk of retaliation	☐ High ☐ Medium ☐ Low ☐ Unknown	
Risk to child / vulnerable person	☐ High ☐ Medium ☐ Low ☐ Unknown	
Need for urgent medical / psychosocial support	☐ High ☐ Medium ☐ Low ☐ Unknown	
Risk to evidence / case integrity	☐ High ☐ Medium ☐ Low ☐ Unknown	

C. Overall Risk Classification

Field	Details
Overall Case Risk Level	☐ Critical ☐ High ☐ Moderate ☐ Low
Reason for classification	

D. Immediate Protection and Control Measures Needed

Measure	Required?
No-contact instruction	☐ Yes ☐ No
Temporary separation of parties	☐ Yes ☐ No
Temporary suspension / restriction of respondent	☐ Yes ☐ No
Medical referral	☐ Yes ☐ No



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Psychosocial support referral	☐ Yes ☐ No
Child protection referral	☐ Yes ☐ No
Police / legal referral	☐ Yes ☐ No
Evidence preservation action	☐ Yes ☐ No
Other: _____	☐ Yes ☐ No

E. Initial Case Route

Field	Details
Proposed Case Route	☐ Immediate Referral Only ☐ Internal Investigation ☐ Safeguarding + Investigation ☐ Child Protection + Investigation ☐ Disciplinary Referral ☐ External Referral + Internal Monitoring
Reason for route selected	_____

F. Initial Actions Taken

Field	Details
Date immediate actions taken	_____
Summary of actions taken	_____
Persons informed	_____

G. Intake Decision and Sign-Off

Field	Details
I confirm that this case has been screened for immediate risk, the required urgent actions have been identified, and the initial route has been set.	
Name	_____
Signature	_____
Date	_____

H. Management Review (where required)

Field	Details
Review Outcome	☐ Confirmed ☐ Returned for Clarification ☐ Escalated
Comments	_____
Name	_____
Position	_____
Signature	_____
Date	_____

Mandatory Rule

This form must be completed within **1 working day** of receipt of the PSEAH report.

Control Note



This form is the first formal case-assessment step. Its purpose is to classify the concern, identify immediate danger, decide whether the case overlaps with safeguarding or child protection, and ensure that CDSJ does not delay urgent protective action. It is not the final investigation record. It is the document that turns a report into an active case with a defined response path.



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ANNEX 3

CDSJ PSEAH REFERRAL AND IMMEDIATE RESPONSE FORM

Instruction: Use this form to record all immediate protective actions and any referral made after a PSEAH concern is received. This form must be completed where there is any urgent response, safeguarding action, child protection action, medical referral, psychosocial referral, police referral, or other same-day protective step.

Field	Details
PSEAH Case Reference No.	
Related Intake Assessment Ref. No.	
Date	
Case Handler / Focal Point	
Position	

A. Immediate Response Trigger

Field	Details
Reason immediate response was required	
Date and Time action started	
Risk Level at Time of Response	☐ Critical ☐ High ☐ Moderate ☐ Low

B. Immediate Protective Measures Taken

Measure	Taken?	Date / Time	Remarks
No-contact instruction issued	☐ Yes ☐ No		
Temporary separation of parties	☐ Yes ☐ No		
Temporary suspension / restriction of respondent	☐ Yes ☐ No		
Safe transport arranged	☐ Yes ☐ No		
Medical support arranged	☐ Yes ☐ No		
Psychosocial support arranged	☐ Yes ☐ No		
Child protection action taken	☐ Yes ☐ No		
Evidence preservation action taken	☐ Yes ☐ No		
Other: _____	☐ Yes ☐ No		

C. External Referral Record

Referral Type	Made?	Organisation / Authority Referred To	Date / Time	Contact Person / Details	Remarks
Police / law enforcement	☐ Yes ☐ No				
Health facility / medical care	☐ Yes ☐ No				
Psychosocial support service	☐ Yes ☐ No				



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Child protection authority	☐ Yes ☐ No				
Social worker / welfare service	☐ Yes ☐ No				
Legal support provider	☐ Yes ☐ No				
Other: _____	☐ Yes ☐ No				

D. Internal Notifications

Person / Office Informed	Date / Time	Method	Remarks
Co-Executive Director – Operations and Technical Services			
Co-Executive Director – Programmes and Partnerships			
Safeguarding / Child Protection Focal Point			
Chairperson / Governance Authority (if required)			
Other: _____			

E. Immediate Response Summary

Field	Details
Summary of actions taken	_____
Any action still pending?	☐ Yes ☐ No
If yes, explain	_____

F. Completed By

Field	Details
Name	_____
Signature	_____
Date	_____

G. Reviewed By

Field	Details
Name	_____
Position	_____
Signature	_____
Date	_____

Mandatory Rule

This form must be completed whenever a PSEAH case requires immediate protection, urgent referral, or same-day response action.

Control Note

This form exists to make sure urgent action is not taken informally and then forgotten. It creates a clear record of who was protected, what was done, who was informed, and which external services or authorities were



engaged. In serious PSEAH cases, the quality of the first 24 hours often determines whether people remain safe, whether evidence is preserved, and whether the organisation can later show that it acted responsibly.



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ANNEX 4

CDSJ PSEAH INVESTIGATION RECORD / CASE PROGRESS FORM

Instruction: Use this form to record the progress of a PSEAH case after intake and initial response. This form must be used to track investigation steps, evidence review, interviews, interim actions, and case movement until closure. It may be updated more than once as the case progresses.

Field	Details
PSEAH Case Reference No.	
Related Intake Assessment Ref. No.	
Related Referral / Immediate Response Ref. No.	
Date Opened for Investigation	
Investigating Officer / Case Handler	
Position	

A. Case Classification

Field	Details
Case Type	☐ Sexual Exploitation ☐ Sexual Abuse ☐ Sexual Harassment ☐ Mixed / Overlapping
Does the case involve a child?	☐ Yes ☐ No
Does the case involve safeguarding overlap?	☐ Yes ☐ No
Current Risk Level	☐ Critical ☐ High ☐ Moderate ☐ Low

B. Investigation Plan

Investigation Step	Required?	Completed?	Date	Remarks
Review initial report and intake file	☐ Yes ☐ No	☐ Yes ☐ No		
Interview complainant / survivor	☐ Yes ☐ No	☐ Yes ☐ No		
Interview respondent	☐ Yes ☐ No	☐ Yes ☐ No		
Interview witness(es)	☐ Yes ☐ No	☐ Yes ☐ No		
Review messages / emails / screenshots	☐ Yes ☐ No	☐ Yes ☐ No		
Review HR / travel / event / contract records	☐ Yes ☐ No	☐ Yes ☐ No		
Review safeguarding / child protection overlap	☐ Yes ☐ No	☐ Yes ☐ No		
Preserve / secure evidence	☐ Yes ☐ No	☐ Yes ☐ No		
Other: _____	☐ Yes ☐ No	☐ Yes ☐ No		

C. Interview and Evidence Log

Date	Person / Evidence Source	Type	Completed By	Summary Note / Ref.
		☐ Interview ☐ Document Review ☐ Digital Evidence ☐ Other		
		☐ Interview ☐ Document Review ☐ Digital Evidence ☐ Other		



		☐ Interview ☐ Document Review ☐ Digital Evidence ☐ Other		
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Add rows as needed.

D. Interim Measures During Investigation

Measure	In Place?	Date Started	Date Reviewed	Remarks
No-contact instruction	☐ Yes ☐ No			
Temporary separation of parties	☐ Yes ☐ No			
Temporary suspension / restriction	☐ Yes ☐ No			
Support / referral still active	☐ Yes ☐ No			
Other: _____	☐ Yes ☐ No			

E. Case Progress Status

Field	Details
Current Case Status	☐ Open ☐ Under Investigation ☐ Awaiting Information ☐ Referred Externally ☐ ☐ Ready for Outcome ☐ Escalated
Key progress summary	_____
Any delay affecting timeline?	☐ Yes ☐ No
If yes, explain	_____

F. Investigation Finding Summary

Field	Details
Preliminary / Final Finding Status	☐ Not Yet Determined ☐ Substantiated ☐ Partly Substantiated ☐ Not Substantiated ☐ Insufficient Information
Short reasons for current finding position	_____
Recommended next step	☐ Outcome Record ☐ Disciplinary Referral ☐ Safeguarding Action ☐ Child Protection Action ☐ External Referral Follow-Up ☐ Other: _____

G. Completed / Updated By

Field	Details
Name	_____
Signature	_____
Date	_____

H. Management / Focal Point Review

Field	Details
Review Outcome	☐ Continue Investigation ☐ Proceed to Outcome ☐ Escalate ☐ Return for Clarification



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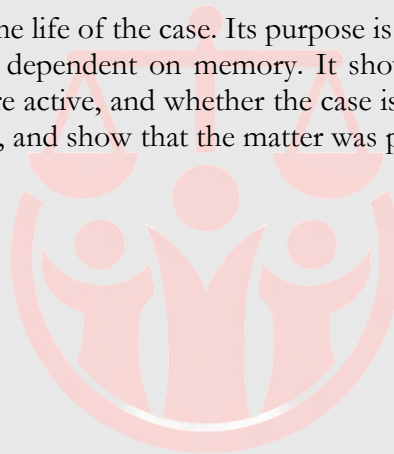
Comments	_____
Name	_____
Position	_____
Signature	_____
Date	_____

Mandatory Rule

This form must be opened once a PSEAH case moves beyond initial intake and must be updated as major investigation steps are completed.

Control Note

This is the working control form for the life of the case. Its purpose is to make sure the investigation does not become informal, undocumented, or dependent on memory. It shows what has been done, what remains outstanding, what interim measures are active, and whether the case is ready for outcome. It also helps CDSJ explain delays, preserve accountability, and show that the matter was progressed in a structured way.



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ANNEX 5 CDSJ PSEAH OUTCOME AND ACTION RECORD

Instruction: Use this form to record the final internal outcome of a PSEAH case, the action taken, any referrals maintained, and any follow-up measures required. This form must be completed once the case reaches an internal determination or formal closure stage.

Field	Details
PSEAH Case Reference No.	
Related Investigation / Case Progress Ref. No.	
Date of Outcome	
Case Handler / Focal Point	
Position	

A. Case Outcome

Field	Details
Outcome Category	☐ Substantiated ☐ Partly Substantiated ☐ Not Substantiated ☐ Insufficient Information ☐ Referred Externally and Monitored ☐ Closed After Immediate Protection / Referral
Type of Concern Confirmed	☐ Sexual Exploitation ☐ Sexual Abuse ☐ Sexual Harassment ☐ Mixed / Overlapping ☐ Not Confirmed
Does the case involve a child?	☐ Yes ☐ No
Short summary of findings	

B. Action Taken

Action	Taken?	Remarks / Reference
No further internal action	☐ Yes ☐ No	
Disciplinary referral / action	☐ Yes ☐ No	
Contract termination / disengagement	☐ Yes ☐ No	
Suspension / restriction maintained	☐ Yes ☐ No	
Safeguarding action taken	☐ Yes ☐ No	
Child protection action taken	☐ Yes ☐ No	
External authority referral made / maintained	☐ Yes ☐ No	
Partner / supplier sanction	☐ Yes ☐ No	
Training / corrective instruction	☐ Yes ☐ No	
Other: _____	☐ Yes ☐ No	

C. Survivor / Affected Person Follow-Up

Field	Details
Was support or referral offered / maintained?	☐ Yes ☐ No
Type of support / referral	



Any ongoing protection measure needed?	☐ Yes ☐ No
If yes, explain	

D. Case Closure Position

Field	Details
Internal Case Status	☐ Closed ☐ Closed Internally, External Matter Continues ☐ Monitoring Required ☐ Escalated Further
Date Closed / Moved to Monitoring	
Any follow-up deadline?	
Follow-up responsibility assigned to	

E. Communication Record

Field	Details
Was complainant / survivor informed of case conclusion, to the extent lawfully possible?	☐ Yes ☐ No
Was respondent informed of internal outcome, where applicable?	☐ Yes ☐ No
Date(s) communicated	
Remarks	

F. Lessons / Risk Management Action

Field	Details
Did this case identify a policy, supervision, programme, partner, or training weakness?	☐ Yes ☐ No
If yes, state required institutional action	

G. Final Sign-Off

Field	Details
I confirm that this outcome record reflects the internal status of the case and the actions taken or referred.	
Name	
Signature	
Date	

H. Review / Approval

Field	Details
Review Outcome	☐ Confirmed ☐ Returned for Clarification ☐ Escalated
Comments	
Name	



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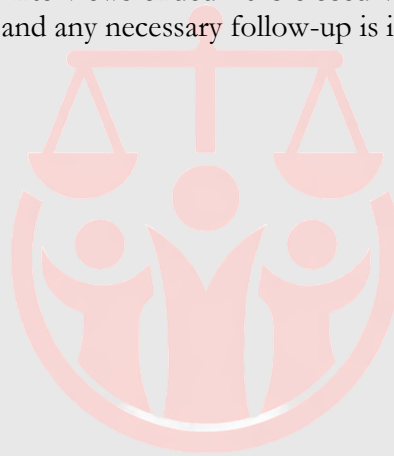
Position	_____
Signature	_____
Date	_____

Mandatory Rule

This form must be completed before a PSEAH case is marked closed internally.

Control Note

This form is the formal closure record. Its purpose is to show what CDSJ concluded, what action followed, whether support or referral remains active, and whether any wider institutional weakness was identified. A case is not properly closed simply because interviews ended. It is closed when the outcome is recorded, action is assigned, communication is managed, and any necessary follow-up is identified.



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ANNEX 6

CDSJ PSEAH CASE REGISTER

Instruction: Use this register to record every PSEAH case received by CDSJ. This register must be maintained by the PSEAH Focal Point or designated case custodian and updated at each major stage of the case.

Field	Details
Register Period	_____
Maintained By	_____
Date Opened	_____

A. PSEAH Case Register





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Case Ref. No.	Date Received	Report Type	Child Involved?	Risk Level	Case Type	Assigned To	Immediate Action Taken?	Current Status	Date Closed / Moved	Remarks
1		☐ Disclosure ☐ Complaint ☐ Observation ☐ Anonymous ☐ Third-Party	☐ Yes ☐ No	☐ Critical ☐ ☐ High ☐ Moderate ☐ ☐ Low	☐ SE ☐ ☐ SA ☐ SH ☐ Mixed		☐ Yes ☐ No	☐ Open ☐ Under Assessment ☐ Under Investigation ☐ Referred ☐ Monitoring ☐ Closed		
2		☐ Disclosure ☐ Complaint ☐ Observation ☐ Anonymous ☐ Third-Party	☐ Yes ☐ No	☐ Critical ☐ ☐ High ☐ Moderate ☐ ☐ Low	☐ SE ☐ ☐ SA ☐ SH ☐ Mixed		☐ Yes ☐ No	☐ Open ☐ Under Assessment ☐ Under Investigation ☐ Referred ☐ Monitoring ☐ Closed		
3		☐ Disclosure ☐ Complaint ☐ Observation ☐ Anonymous ☐ Third-Party	☐ Yes ☐ No	☐ Critical ☐ ☐ High ☐ Moderate ☐ ☐ Low	☐ SE ☐ ☐ SA ☐ SH ☐ Mixed		☐ Yes ☐ No	☐ Open ☐ Under Assessment ☐ Under Investigation ☐ Referred ☐ Monitoring ☐ Closed		



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4		☐ Disclosure ☐ ☐ Complaint ☐ ☐ Observation ☐ ☐ Anonymous ☐ ☐ Third-Party	☐ Yes ☐ No	☐ Critical ☐ ☐ High ☐ ☐ Moderate ☐ ☐ Low	☐ SE ☐ ☐ SA ☐ ☐ SH ☐ ☐ Mixed		☐ Yes ☐ No	☐ Open ☐ Under Assessment ☐ Under Investigation ☐ Referred ☐ Monitoring ☐ Closed		
5		☐ Disclosure ☐ ☐ Complaint ☐ ☐ Observation ☐ ☐ Anonymous ☐ ☐ Third-Party	☐ Yes ☐ No	☐ Critical ☐ ☐ High ☐ ☐ Moderate ☐ ☐ Low	☐ SE ☐ ☐ SA ☐ ☐ SH ☐ ☐ Mixed		☐ Yes ☐ No	☐ Open ☐ Under Assessment ☐ Under Investigation ☐ Referred ☐ Monitoring ☐ Closed		

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Add rows as needed.

B. Register Review Summary

Field	Details
Total Cases in Period	_____
Number of Open Cases	_____
Number of Critical / High-Risk Cases	_____
Number Referred Externally	_____
Number Closed	_____
Any repeated pattern or hotspot identified?	☐ Yes ☐ No
If yes, explain briefly	_____

C. Prepared By

Field	Details
Name	_____
Position	_____
Signature	_____
Date	_____

D. Reviewed By

Field	Details
Name	_____
Position	_____
Signature	_____
Date	_____

Mandatory Rule

Every PSEAH concern that is accepted as a case must be entered into this register on the same working day or, where intake is still being finalised, not later than the next working day. _____

Control Note

This register is the central control tool for PSEAH case oversight. It is not a substitute for the full case file, but it allows CDSJ to monitor case flow, timeliness, risk level, and closure status across the organisation. It also helps identify patterns such as repeated incidents in the same unit, same project, same setting, or same type of misconduct. The register must be stored securely and access must be strictly limited.

ANNEX 7

CDSJ PSEAH CONFIDENTIALITY AND CONFLICT OF INTEREST DECLARATION FORM

Instruction: Use this form for any person handling, reviewing, investigating, advising on, or deciding a PSEAH case. This includes focal points, investigators, managers, reviewers, disciplinary chairpersons, note-takers, and governance reviewers where applicable. The form must be signed before the person takes part in the case process.

Field	Details
PSEAH Case Reference No.	
Date	
Name of Declarant	
Position / Role in Case	
Department / Office	

A. Confidentiality Declaration

Statement	Tick
I understand that this case involves highly sensitive information and must be handled on a strict need-to-know basis.	☐
I will not share, discuss, circulate, copy, screenshot, forward, or disclose case information except as required for the authorised handling of this case.	☐
I will protect all written, digital, and verbal information connected to this case.	☐
I understand that breach of confidentiality may expose the complainant, survivor, child, witness, or respondent to harm and may itself amount to misconduct.	☐

B. Conflict of Interest Check

Question	Response
Do you have any personal, family, romantic, supervisory, financial, professional, or other relationship with the complainant, survivor, respondent, or a key witness that may affect your impartiality?	☐ Yes ☐ No
Have you previously handled, advised on, or taken a position on this matter in a way that may affect your neutrality?	☐ Yes ☐ No
Are you a witness in this matter, or likely to become one?	☐ Yes ☐ No
Do you have any other interest or circumstance that may create a real or perceived conflict in this case?	☐ Yes ☐ No

C. If “Yes”, Give Details

Field	Details
Nature of conflict or concern	
Person(s) involved	
Why this may affect impartiality	

D. Declarant Undertaking

Field	Details
I declare that the information above is true and complete. I understand that if a conflict exists, I may be removed from the case or assigned no role. I also understand that breach of confidentiality or non-disclosure of conflict may lead to disciplinary or other action.	
Signature	_____
Date	_____

E. Decision on Participation

Field	Details
Decision	☐ No conflict identified, may proceed ☐ Conflict identified, limited role allowed ☐ Conflict identified, must withdraw ☐ Escalate for reassignment
Conditions / Instructions	_____
Name of Reviewer	_____
Position	_____
Signature	_____
Date	_____

Mandatory Rule

This form must be signed before a person participates in a PSEAH case process.

Control Note

PSEAH cases are highly sensitive and often involve strong power dynamics, reputational risk, trauma, and confidentiality obligations. This form protects the integrity of the case by ensuring that only appropriate and impartial people handle it, and that those people understand the seriousness of confidentiality. A case handler who is conflicted or careless with information can damage the case even where the original report was valid.