ANGELS CENTER OF HOPE

Prevention of Sexual Exploitation Policy

https://angelscenterofhope.org/

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1. POLICY STATEMENT

Angels Center of Hope(ACOH) is committed to maintaining a safe, respectful, inclusive, and protective environment for all individuals who come into contact with the organization, including children, vulnerable adults, beneficiaries, employees, volunteers, community members, and partners.

The organization has a zero-tolerance policy toward all forms of sexual exploitation, sexual abuse, sexual harassment, sexual misconduct, and abuse of power.

Sexual exploitation and abuse are serious violations of human rights, individual dignity, organizational values, and professional responsibilities. Such conduct will not be tolerated under any circumstances, regardless of an individual's position, authority, status, or length of service with the organization.

The organization prohibits employees, volunteers, board members, contractors, consultants, and representatives from using their positions, authority, influence, or access to beneficiaries to obtain sexual favors, engage in sexual exploitation, or commit sexual abuse.

All individuals associated with the organization are required to uphold this policy and actively contribute to preventing sexual exploitation and abuse.

2. PURPOSE OF THE POLICY

The purpose of this policy is to:

1. Prevent all forms of sexual exploitation and abuse within the organization's programs, activities, and operations.
2. Protect children, vulnerable adults, beneficiaries, and community members from sexual misconduct and abuse of power.
3. Establish clear standards of professional conduct and appropriate boundaries.
4. Prohibit the exchange of money, employment, assistance, services, goods, or other benefits for sexual favors.
5. Establish safe, confidential, and accessible reporting mechanisms.
6. Ensure allegations are handled promptly, fairly, and appropriately.
7. Protect complainants, survivors, witnesses, and individuals reporting concerns from retaliation.
8. Promote awareness, education, accountability, and responsible organizational leadership.
9. Ensure compliance with applicable federal, Louisiana state, and local laws.

3. SCOPE OF APPLICATION

This policy applies to all individuals working for, representing, or acting on behalf of ACOH including:

- Board of Directors and governing body members.
- Executive Director and senior management.
- Full-time and part-time employees.
- Volunteers and interns.
- Consultants and independent contractors.
- Program officers and project coordinators.
- Community outreach workers and field personnel.
- Drivers, security personnel, and support staff.
- Partner organizations and implementing agencies.
- Donors, representatives, and visitors when participating in organizational activities.

This policy applies to conduct occurring at organizational offices, program sites, community facilities, schools, homes, events, field activities, transportation arrangements, online platforms, and other locations where individuals interact through organizational activities.

It also applies to conduct outside working hours where there is a relevant connection to the organization's work, authority, representation, or relationship with beneficiaries.

4. DEFINITIONS

4.1 Sexual Exploitation

Sexual exploitation means any actual or attempted abuse of a position of vulnerability, unequal power, trust, or dependence for sexual purposes, including obtaining financial, social, political, or other benefits from the sexual exploitation of another person.

4.2 Sexual Abuse

Sexual abuse means any actual or threatened physical intrusion of a sexual nature, whether by force, coercion, intimidation, manipulation, or under unequal or coercive conditions.

4.3 Sexual Harassment

Sexual harassment includes unwelcome sexual advances, requests for sexual favors, inappropriate sexual comments, gestures, touching, messages, or other verbal, physical, or electronic conduct of a sexual nature.

4.4 Abuse of Power

Abuse of power occurs when an individual uses their organizational position, authority, influence, access to resources, or control over assistance to manipulate, intimidate, exploit, or sexually abuse another person.

4.5 Beneficiary

A beneficiary is any individual, family, group, or community receiving or seeking assistance, services, resources, opportunities, or support from the organization.

4.6 Survivor

A survivor is an individual who has experienced sexual exploitation, sexual abuse, or related misconduct.

4.7 Child

A child is any person under eighteen (18) years of age.

4.8 Vulnerable Adult

A vulnerable adult refers to an adult who, because of disability, dependency, illness, age, circumstances, or another factor, may be at increased risk of exploitation, coercion, abuse, or manipulation.

5. ZERO-TOLERANCE PRINCIPLES

The organization maintains the following principles:

5.1 Prohibition of Sexual Exploitation and Abuse

All forms of sexual exploitation and abuse are prohibited, whether occurring during working hours, organizational activities, or through relationships arising from organizational responsibilities.

5.2 No Exchange of Assistance for Sexual Favors

Employees, volunteers, and representatives must never request, offer, imply, or accept sexual favors in exchange for:

- Financial assistance.
- Food, clothing, shelter, or other material support.
- Employment or volunteer opportunities.
- Educational support or scholarships.
- Medical assistance or referrals.
- Housing or accommodation.
- Program enrollment or beneficiary selection.
- Access to services, grants, or organizational resources.
- Preferential treatment or other organizational benefits.

5.3 Protection of Children

Sexual activity with any person under eighteen years of age by an employee, volunteer, contractor, or representative acting through the organization is prohibited, regardless of local age-of-consent rules or claims of consent, subject to applicable law.

Mistaken belief about a child's age is not an acceptable defense under this organizational policy.

5.4 Respect and Dignity

All individuals shall be treated with dignity, fairness, compassion, and respect without discrimination, intimidation, manipulation, or exploitation.

5.5 Accountability

Every individual associated with the organization is responsible for preventing, identifying, and reporting suspected sexual exploitation and abuse.

6. PROHIBITED CONDUCT

The following behaviors are strictly prohibited:

1. Sexual abuse, assault, exploitation, or harassment of any beneficiary or community member.
2. Requesting or accepting sexual favors in exchange for organizational assistance, resources, services, or opportunities.
3. Using authority or influence to pressure another person into sexual activity.
4. Engaging in sexual relationships with children.
5. Grooming, manipulating, threatening, or coercing beneficiaries for sexual purposes.
6. Offering money, gifts, employment, transportation, accommodation, or other benefits in exchange for sexual activity.

7. Sharing or requesting sexually explicit photographs, videos, or messages from beneficiaries, especially children.
8. Engaging in unwanted sexual touching, advances, comments, or gestures.
9. Using organizational vehicles, facilities, equipment, or communication channels to facilitate sexual exploitation.
10. Retaliating against anyone who reports suspected sexual exploitation or abuse.
11. Concealing allegations or interfering with reporting, investigations, or safeguarding procedures.
12. Knowingly allowing sexual exploitation or abuse to continue without taking appropriate action.

7. PROFESSIONAL BOUNDARIES AND STAFF CONDUCT

All employees, volunteers, contractors, and representatives must maintain professional boundaries in their relationships with beneficiaries and community members.

They shall:

- Treat all beneficiaries fairly and respectfully.
- Avoid situations involving inappropriate personal dependence or favoritism.
- Never use their position to pursue sexual relationships with individuals receiving assistance.
- Maintain appropriate communication with beneficiaries.
- Avoid private or inappropriate meetings that create opportunities for exploitation.
- Never use organizational resources to facilitate inappropriate relationships.
- Respect personal boundaries and individual consent.
- Report suspected misconduct promptly.

Any relationship involving unequal power, dependency, or organizational influence must be assessed carefully to prevent exploitation or conflicts of interest.

8. PREVENTION MEASURES

The organization shall implement appropriate measures to prevent sexual exploitation and abuse.

8.1 Recruitment and Screening

The organization shall:

- Conduct appropriate background checks where legally permitted.
- Verify employment and volunteer references.
- Review relevant professional and disciplinary history.
- Assess applicants' suitability for positions involving vulnerable populations.
- Require written acknowledgment of this policy.
- Exclude individuals from relevant responsibilities where credible safeguarding concerns make their participation inappropriate, consistent with applicable law.

8.2 Staff and Volunteer Training

All employees and volunteers shall receive PSEA orientation and training.

Training shall include:

- Understanding sexual exploitation and abuse.
- Recognizing abuse of power and grooming behavior.
- Maintaining appropriate professional boundaries.
- Understanding prohibited relationships and conduct.

- Recognizing signs of sexual abuse and exploitation.
- Reporting allegations and safeguarding concerns.
- Protecting survivors and witnesses from retaliation.
- Understanding applicable Louisiana and federal reporting requirements.

8.3 Beneficiary Awareness

The organization shall inform beneficiaries of their rights and explain that:

- Assistance is provided without sexual conditions.
- No employee or volunteer has the right to demand sexual favors.
- Beneficiaries may report inappropriate behavior without fear of losing assistance.
- Complaints will be taken seriously.
- Reporting channels are available and accessible.

8.4 Program Risk Assessments

The organization shall assess the risk of sexual exploitation and abuse in its programs and activities.

Risk assessments shall consider:

- Unequal power relationships.
- Access to vulnerable individuals.
- Distribution of financial and material assistance.
- Transportation and accommodation arrangements.
- Private meetings and home visits.
- Online interactions and communication.
- Supervision and accountability arrangements.

Appropriate preventive measures shall be implemented to reduce identified risks.

9. REPORTING MECHANISMS

The organization shall maintain accessible and confidential reporting mechanisms for employees, volunteers, beneficiaries, parents, guardians, partners, and members of the public.

Concerns may be reported through:

- The designated PSEA Focal Person.
- The Executive Director.
- The Human Resources Officer.
- The Board Chairperson.
- A designated safeguarding email address.
- An organizational complaint or reporting telephone number.
- Appropriate external authorities.

Reports may be made by survivors, witnesses, family members, or individuals who reasonably suspect misconduct.

Reports may be submitted anonymously where organizational reporting systems allow. However, anonymous reporting may limit the organization's ability to investigate or provide follow-up.

No individual shall be discouraged, intimidated, threatened, or prevented from reporting a concern.

10. RESPONSE TO ALLEGATIONS

All allegations of sexual exploitation and abuse shall be treated seriously and handled promptly.

Upon receiving a complaint, the organization shall:

1. Listen respectfully and take the allegation seriously.
2. Assess whether anyone is in immediate danger.
3. Arrange appropriate emergency assistance where necessary.
4. Refer suspected criminal conduct to the appropriate authorities.
5. Notify the designated safeguarding representative, unless that individual is implicated.
6. Protect the confidentiality and dignity of the complainant.
7. Document the allegation securely and accurately.
8. Conduct or arrange an appropriate impartial investigation, where authorized and appropriate.
9. Take interim protective measures where necessary.
10. Determine appropriate organizational action based on the findings and applicable law.

The organization shall not conduct investigations in a manner that interferes with criminal investigations or exposes survivors to additional harm.

11. SURVIVOR-CENTERED APPROACH

The organization shall adopt a survivor-centered approach in responding to sexual exploitation and abuse.

This means:

- Respecting the survivor's dignity, privacy, safety, and rights.
- Listening without judgment or blame.
- Avoiding unnecessary repetition of traumatic experiences.
- Providing information about available support services.
- Facilitating access to appropriate medical, psychological, legal, and social support.
- Respecting the survivor's choices and informed consent, subject to applicable legal reporting obligations.
- Avoiding discriminatory or retaliatory treatment.
- Maintaining confidentiality to the extent reasonably possible and legally permitted.

The organization shall not require survivors to confront alleged perpetrators or participate in mediation as a condition of receiving support.

12. CONFIDENTIALITY AND DATA PROTECTION

All reports, allegations, investigation records, and survivor information shall be treated as sensitive and confidential.

The organization shall:

1. Restrict access to authorized personnel.
2. Store records securely.
3. Avoid sharing identifying information unnecessarily.
4. Obtain appropriate consent before sharing information for support referrals, subject to legal obligations.
5. Comply with applicable privacy and data protection requirements.
6. Preserve records in accordance with organizational retention procedures and applicable law.

Confidentiality shall not prevent mandatory reporting or lawful cooperation with authorities.

13. PROTECTION AGAINST RETALIATION

Retaliation against individuals who report concerns in good faith, participate in investigations, or support survivors is strictly prohibited.

Retaliation includes:

- Threats or intimidation.
- Harassment or bullying.
- Unfair termination or suspension.
- Withdrawal of assistance as punishment for reporting.
- Exclusion from organizational activities.
- Discrimination or victimization.
- Attempts to silence complainants or witnesses.

Any individual found to have engaged in retaliation may face disciplinary action.

14. RESPONSIBILITIES OF ORGANIZATIONAL LEADERSHIP

The Board of Directors and Executive Leadership shall:

- Approve and promote implementation of this policy.
- Allocate appropriate resources for PSEA activities.
- Appoint a qualified PSEA Focal Person.
- Ensure regular staff and volunteer training.
- Establish accessible complaint mechanisms.
- Ensure allegations are handled appropriately.
- Protect individuals who report concerns.
- Monitor organizational compliance.
- Review and update the policy periodically.

Leadership shall demonstrate accountability and ensure that no individual is exempt from the policy because of their seniority or organizational position.

15. ROLE OF THE PSEA FOCAL PERSON

The organization shall appoint a Prevention of Sexual Exploitation and Abuse Focal Person.

The focal person shall:

1. Coordinate implementation of the policy.
2. Promote PSEA awareness and training.
3. Receive and securely document complaints.
4. Facilitate appropriate referrals.
5. Advise management on safeguarding concerns.
6. Monitor preventive measures.
7. Support safe and confidential reporting procedures.
8. Maintain appropriate records.
9. Recommend policy improvements.

The focal person shall not investigate their own allegations or any complaint in which they have a conflict of interest.

16. PARTNERS AND THIRD-PARTY COMPLIANCE

All implementing partners, contractors, consultants, and service providers working with or representing the organization shall be expected to maintain appropriate standards against sexual exploitation and abuse.

Where appropriate, agreements shall include:

- A commitment to prevent sexual exploitation and abuse.
- Compliance with applicable laws.
- Appropriate screening and training.
- Accessible complaint mechanisms.
- Reporting and referral procedures.
- Cooperation with authorized investigations.
- Consequences for serious violations.

The organization may suspend or terminate relationships where serious violations occur, subject to applicable law and contractual obligations.

17. DISCIPLINARY MEASURES

Any employee, volunteer, contractor, or representative who violates this policy may be subject to disciplinary action.

Depending on the circumstances and findings, actions may include:

- Formal warnings.
- Suspension from duties.
- Removal from beneficiary-facing responsibilities.
- Termination of employment or volunteer engagement.
- Termination of contractual or partnership arrangements.
- Referral to appropriate law enforcement or regulatory authorities.

Disciplinary decisions shall be handled fairly and consistently with applicable law and organizational procedures.

18. MONITORING AND POLICY REVIEW

The organization shall periodically monitor the implementation and effectiveness of this policy.

The policy shall be reviewed at least annually and whenever there are significant changes in applicable laws, organizational activities, or identified safeguarding risks.

The Board of Directors shall oversee policy approval, implementation, and review.

19. LEGAL AND REGULATORY FRAMEWORK

This policy shall be implemented in accordance with applicable federal, Louisiana state, and local laws, including, where relevant:

- Title VII of the Civil Rights Act of 1964.
- The Civil Rights Act of 1991.
- The Violence Against Women Act, where applicable.
- The Trafficking Victims Protection Act and applicable amendments.
- The Child Abuse Prevention and Treatment Act (CAPTA), where applicable.

- Louisiana Children's Code, including provisions concerning child abuse and mandatory reporting.
- Louisiana Revised Statutes (R.S)14:46.2 concerning human trafficking.
- Louisiana Revised Statutes (R.S)14:403 concerning child abuse reporting.
- Applicable federal and state employment, civil rights, and victim protection laws.

Where applicable law imposes greater protection or additional reporting obligations, the law shall prevail.

20. ORGANIZATIONAL COMMITMENT

ACOH reaffirms its commitment to preventing sexual exploitation and abuse in all its programs, activities, and operations.

The organization recognizes that every individual has the right to safety, dignity, equality, and freedom from sexual exploitation and abuse.

We commit to maintaining a culture of integrity, accountability, transparency, respect, and protection for all individuals, particularly children and vulnerable populations.

All employees, volunteers, board members, partners, and representatives are required to understand, acknowledge, and comply with this policy.

21. BOARD APPROVAL AND ADOPTION

This Prevention of Sexual Exploitation and Abuse Policy has been reviewed and adopted by the Board of Directors of [Organization Name].

Approved by : ACOH Board of Directors

Date of Approval: January 5,2024

22. REPORTING & SUPPORT CONTACTS

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The organization should display the following reporting information in its offices, program facilities, staff handbook, and beneficiary information materials.

A. **Child Abuse, Neglect, & Juvenile Sex Trafficking:** Call the Louisiana Department of Children and Family Services (DCFS) Hotline at 1-855-4LA-KIDS (1-855-452-5437) — toll-free, available 24/7 (select option #4 for sex/labor trafficking
B. **National Human Trafficking Hotline:** Call 1-888-373-7888 or text HELP or INFO to 233733 for 24/7 support and reporting.
C. **Louisiana State Police Hotline**: Call 800-434-8007 or file an online report through the Louisiana State Police Suspicious Activity Portal.
D. **Online Exploitation & Cyber Tip line**: Call 1-800-843-5678 (National Center for Missing & Exploited Children / Cyber Tip line) for online enticement, child pornography, or image exploitation
E. **Adult & Elderly Protective Services:**
    - **Ages 18–59:** Call Adult Protective Services at 1-800-898-4910.
    - **Ages 60 and older**: Call Elderly Protective Services at 1-833-577-6532