

# PREVENTING SEXUAL EXPLOITATION & ABUSE (PSEA), ETHICS & ANTI-FRAUD POLICY



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# **Chapter 1: Firm Profile**

Youth Tube (Pvt.) Ltd. is a development consultancy firm that has undergone renewal, expansion, and transformation. Over the course of five years, it dedicated its efforts to developing media and messaging for young people, aiming to foster a more productive, hopeful, and engaged youth population in Pakistan. Now, it has evolved into a fully-fledged development firm, ready to tackle a broader range of development challenges and opportunities facing the Pakistani youth.

Central to our **VISION** is "to be the leading catalyst for positive change and sustainable development, empowering young people to realize their full potential and create a brighter future for Pakistan."

Our **MISSION** is clear:" to empower young people and drive sustainable development by leveraging our expertise, innovation, and collaborative partnerships."

## Chapter 2: Preventing Sexual Exploitation & Abuse (PSEA) Policy

## Introduction:

Youth Tube is committed to promoting youth development and protecting human rights in Pakistan. As part of our dedication to maintaining a safe and respectful environment for all individuals involved in our programs and activities, we have implemented this Preventing Sexual Exploitation and Abuse (PSEA) Policy. This policy outlines the firm's stance on preventing and addressing sexual exploitation and abuse, and establishes guidelines for reporting and responding to such incidents.

#### **Policy Statement:**

Youth Tube is committed to the prevention of sexual exploitation and abuse (PSEA) in all its forms, including but not limited to sexual harassment, sexual abuse, sexual violence, and any other form of inappropriate sexual behavior. The Youth Tube recognizes that SEA is a violation of human rights and is detrimental to the well-being and dignity of individuals. We firmly condemn any act of SEA within our programs, activities, and the communities we serve.

#### Scope:

This policy applies to all employees, participants, volunteers, trainers, contractors, consultants, partner firms, and any other individual associated with Youth Tube. It encompasses all programs, activities, and events organized or supported by the firm, both in Pakistan and internationally.



## Key Principles:

#### 1. Respect and Dignity:

We uphold the rights and dignity of all individuals, and strive to create an inclusive and safe environment free from harassment, abuse, and exploitation.

#### 2. Zero Tolerance:

We have zero tolerance for any form of sexual exploitation and abuse, irrespective of the perpetrator's position or the victim's role.

## 3. Confidentiality and Whistleblower Protection:

We encourage reporting of SEA incidents and ensure the confidentiality of individuals involved. Retaliation against whistleblowers is strictly prohibited and will be dealt with appropriately.

## 4. Survivor-Centered Approach, Awareness and Referral Mechanism:

We prioritize the well-being and support of survivors of SEA, ensuring access to appropriate services, information, and assistance. All team members of Youth Tube are required to share the information about locally available support services which may include but not limited to:

- a. Offices of Ombudspersons
- b. Punjab Women's help line of Punjab Commission on the Status of Women-1043
- c. Punjab Police Safety App by Punjab Safe City Authorities
- d. Cyber-crimes and harassment to FIA at <u>complaints@fia.gov.pk</u> or <u>helpdesk@nr3c.gov.pk</u> or <u>helpdesk@nr3c.gov.pk</u>.
- e. Sahil Toll-Free helpline: 0800-13518
- f. Pakistan Citizen portal

## **Prevention Measures:**

#### 1. Code of Conduct:

All individuals associated with Youth Tube must adhere to a comprehensive code of conduct that explicitly prohibits SEA and outlines expected behavior.

## 2. Screening and Vetting:

Appropriate background checks and reference verifications are conducted for employees, participants, volunteers, trainer and partners working directly or indirectly with vulnerable populations. *Annex 1-Reference Check Form and Annex 2-Self Declaration Form to be filled out*.

## 3. Training and Awareness:

Regular training and awareness programs are provided to staff, volunteers, service providers and partners, highlighting the firm's PSEA policies, signs of SEA, reporting mechanisms, and the rights and responsibilities of all individuals.



## 4. Reporting Mechanisms:

Clear and accessible reporting mechanisms are established, including multiple channels (email, dedicated staff) to report SEA incidents, ensuring that survivors and witnesses can safely come forward. *Please refer to Chapter 4 below and Whistle Blowing Policy of Youth Tube for details*.

#### 5. Response and Investigations:

Prompt and thorough investigations will be conducted upon receipt of a report, following a survivor-centered and impartial approach. Appropriate actions will be taken, ranging from disciplinary measures to legal action, depending on the severity of the incident.

# **Responsibilities:**

## 1. Leadership:

The firm's leadership is responsible for establishing and maintaining a culture of safety and accountability, ensuring compliance with the PSEA policy, and supporting survivors.

## 2. Staff, Volunteers, Service Provider, BODs:

All staff, volunteers, service providers and Directors are responsible for adhering to the PSEA policy, being vigilant for signs of SEA, reporting incidents promptly, and cooperating fully with investigations.

#### 3. Partners:

Partner firms working with Youth Tube are expected to uphold similar standards and principles regarding SEA prevention and response.

#### 4. Implementation and Review:

This policy will be disseminated widely and made available to all individuals associated with Youth Tube. Regular reviews will be conducted to ensure its effectiveness, responsiveness, and alignment with national and international standards. Any necessary updates or amendments will be made accordingly.

By implementing this Preventing Sexual Exploitation and Abuse Policy, Youth Tube reaffirms its commitment to maintaining a safe, respectful and inclusive environment for all individuals involved in our programs and activities.

In this document, unless there is anything repugnant in the context, the following words shall have the meanings ascribed thereto below".



"Sexual Harassment" means any unwelcome sexual advance, request for sexual favors or other verbal, (sounds, words, sexually colored remarks, obscene jokes) or written communication or physical conduct of a sexual nature or sexually demeaning attitudes, causing interference with work performance or creating an intimidating, hostile or offensive work environment, or the attempt to punish the complainant for refusal to comply to such a request or is made a condition for employment;

"**Violence**", within the context of the workplace, includes any act in which a person is abused, threatened, intimidated or assaulted in his or her employment. Workplace violence includes:

- Threatening behaviour such as shaking fists, destroying property or throwing objects.
- Verbal or written threats any expression of intent to inflict harm.
- Harassment any behaviour that demeans, embarrasses, humiliates, annoys, alarms or verbally abuses a person and that is known or would be expected to be unwelcome. This includes words, gestures, intimidation, bullying, or other inappropriate activities.
- Verbal abuse swearing, insults or condescending language.
- Physical attacks hitting, shoving, pushing or kicking.
- Criminal theft, rape, arson and murder

Workplace violence is not limited to incidents that occur within a traditional workplace. Workrelated violence can occur at off-site business-related functions (conferences, trade shows), at social events related to work, in clients' homes or away from work but resulting from work (a threatening telephone call to your home from a client).

"Volunteer", shall mean any person who voluntarily provides services to Youth Tube.



## **Chapter 3: Ethics & Anti-Fraud**

As a firm, working to promote peace, justice and cooperation among youth in Pakistan; Ethics play a crucial role in the development and implementation of anti-harassment, ethics, and anti-fraud policies within firms like Youth Tube.

Youth Tube ensures that it adheres to best practices of honesty, integrity, accountability and transparency. The purpose of adopting a formal Ethics Policy is to provide employees, Directors and volunteers with guidelines for use in the conduct of their work on behalf of Youth Tube in line with the Firm's values and Vision.

As representatives of Youth Tube, every employee and the Directors has a significant role to play in preserving and nurturing Youth Tube's reputation for honesty, integrity and fair play in dealing with fellow employees, fellow Directors, Government, the Community and the general public.

#### 1.1 Honest and Ethical Conduct

a. All employees, Directors and volunteers are to conduct themselves in accordance with the highest standards of personal and professional integrity. Character reflects what a person is; reputation denotes what a community considers a person to be. **YOUTH TUBE** will not tolerate any conduct, which might be detrimental to its reputation.

#### 1.2 Compliance with applicable State laws, rules and regulations

b. Employees, Directors, and volunteers are expected to conduct themselves and conduct the affairs of YOUTH TUBE in full compliance with all the legal and regulatory requirements. YOUTH TUBE is committed to maintaining transparency in the conduct of its work including financial and other decision-making and through the implementation of well-defined processes and procedures. YOUTH TUBE adheres to law and ensures that its expenses are audited annually by a reputed Audit firm.

#### 1.3 No Workplace violence

c. Youth Tube is committed to creating and maintaining a working and learning environment. Mutual understanding between, and respect towards, all individuals are essential elements for excellence in professionalism, and existence of a safe and healthy workplace. Youth Tube prohibits violent acts and threats of violence. Any employee or Directors, who commits or threatens to commit a violent act, is subject to disciplinary action.



#### 1.4 No Discrimination or Harassment

No employee, Directors or volunteer shall because of race, creed, colour, national/ ethic origin, gender, marital status, sexual orientation, religion, ethnicity, education, age, or physical or mental disability, be subjected to any discrimination or to any harassment by another employee, Directors or volunteer.

YOUTH TUBE adheres to the principles laid down in the *Protection Against Harassment of Women at the Workplace Act 2010.* Youth Tube will display the awareness-raising material relating to the said law at visible place in office. Also form 3-member Standing Inquiry Committee according to the specifications given in the Act 2010.

# **Chapter 4: Inquiry Committee**

Youth Tube shall constitute Inquiry Committee within thirty days of the enactment of this policy to enquire into complaints under this policy.

The Committee shall consist of three members of whom at least one member shall be a woman. One member shall be from senior management and one shall be a senior representative of the employees or a senior employee. One or more members can be co-opted from outside the firm if the firm is unable to designate three members from within as described above. A Chairperson shall be designated from amongst them.

In case a complaint is made against one of the members of the Inquiry Committee that member should be replaced by another for that particular case. Such member may be from within or outside the firm.

In case where no competent authority is designated the firm shall within thirty days of the enactment of this policy designate a competent authority.

On receipt of any written complaint, the Inquiry Committee will acknowledge the receipt to the complainant within 3 days. Cases of severe nature will be responded to within 24 hours.

The IC will then summon the accused person/both parties for clarification on the accusation framed against him / her in writing.

After getting the written response from the accused, the IC will investigate and suggest appropriate corrective action to the concerned authorities.



The matter will be resolved within 7 days. If the case falls under the criminal penalty, it will be reported to relevant government authorities with the consent of the victim.

The power of the inquiry committee shall be according to the Clause 5 of *Protection Against Harassment of Women at the Workplace Act 2010.* 

#### Abuse of power and extortion

**a.** Employees, Directors and volunteers may not use any form of extortion whether as a method to gain undue advantage or otherwise use their status within the firm for personal gain. Employees, Directors and volunteers will use Youth Tube property, facilities, services and financial resources strictly in accordance with Youth Tube's administrative policies laid down in the Operations Manual.

#### 1.5 Bribery

Employees, Directors and volunteers should neither receive bribes from potential partners to make contracts with them nor give bribes to them as a way of influencing them.

#### 1.6 Nepotism and favoritism

While there are certain prohibitions against employment of close relatives, it is paramount that the integrity of the personnel process be maintained. Nepotism is favoritism toward relatives and friends. For instance, offering employment to a relative or friend, despite the fact that there are others who are better qualified and willing to perform the job, or offering higher earnings, or other benefits to employees who have a personal relation with the management or Directors. To avoid favoritism and nepotism in procurement and recruitment YOUTH TUBE follows the **Procurement and HR policies**.

Any case involving a close relative of the Directors of Youth Tube for either recruitment or procurement will go to the Board and that member will not have a vote on this issue.

#### 1.7 Gifts

Employees, Directors and volunteers should refrain from offering or receiving gifts and/ or entertainment with a view to improperly influencing or inducing those persons in order to obtain some benefit or result. Youth Tube will not give or receive, directly or indirectly, any gift or other favour that may influence the exercise of its functions, performance of duty or may in other ways have the effect of possibly harming Youth Tube. Gifts are defined as but not limited to, services, travel, entertainment, material things or favours. In order to respect local traditions and conventional hospitality minor gifts maximum up to Rs. 5,000/- may be accepted but the same must be reported to the supervisor.

The value of an acceptable gift varies in different countries. Cash gifts can never be accepted. All employees, Directors and volunteers are expected to show good



judgment and when in doubt, contact their superior/Board. A rule of thumb is that a gift should never influence one's independent judgment and one must share the minor gifts (if these are shareable) with other colleagues.

#### 1.8 Fraud, Theft or Illegal Activity

Employees, Directors and volunteers shall be alert and vigilant with respect to frauds, thefts or significant illegal activity committed within the Organisation and should immediately report the same to their supervisor. Employees, Directors and volunteers must ensure that fraud or violation of Youth Tube Rules is not done by them willfully when filing claims or incurring expenses for Youth Tube. The attention of the employees, Directors and volunteers is drawn to the relevant policies in this regard. Employees, Directors and volunteers must also ensure that Youth Tube letterheads, stamps or other items are not used in an unauthorized way.

#### 1.9 Copyright

Any work undertaken by an employee, Directors and volunteer for YOUTH TUBE in the course of their official duties is the sole property of YOUTH TUBE and may not be retained, copied or used in any way for personal benefit unless otherwise agreed with YOUTH TUBE.

#### 1.10 YOUTH TUBE Complaint Procedures and handling inquiry.

- a. The procedure of holding inquiry shall be according to the Clause 4 of *Protection Against Harassment of Women at the Workplace Act 2010.*
- b. Employees, Directors, volunteers or others may come forward with credible information on illegal practices or violations of YOUTH TUBE Policies or Procedures.
- c. In the event that an employee, Directors or a volunteer wishes to make a complaint the same may be sent by email to <u>safeguarding.Youth</u> <u>Tube@gmail.com</u> or in writing to a senior designated person. Such correspondence shall be treated in confidence.
- d. If it is a case of sexual harassment to be handled according to the law, the person harassed has to make the complaint.
- e. The complaint will be handled with great respect for the complainant and the persons/ firms against whom the complaint is lodged. The complainant should not fear retaliation and at the same time YOUTH TUBE employees, Directors and volunteers should work without risk of victimization/ harassment.



f. These complaints will be investigated by the senior designated person who shall report to Executive Director and the Board as the situation demands.

## **1.11** Accountability for non-adherence to the Anti-Harassment & Ethics policy;

All YOUTH TUBE employees, Directors and volunteers are required to follow the Policy. Breach of the Policy will be reported to the YOUTH TUBE Board for further action.



# Annex 1-Reference Form

## YOUTH TUBE CANDIDATE REFERENCE CHECK FORM

Name Of Candidate	
Position Applied for	
Name and Title of the Referee	
Name of Referee's Firm	
Contact Number	
Knowing The Candidate (Professionally Or Personally)	
Period of association with candidate	
Date of Reference Check	

Youth Tube is a youth development firm actively working to promote peace, justice and cooperation amongst the youth<sup>1</sup> in Pakistan. The firm has focused on creating opportunities and amplifying the voices of the youth ever since its inception in 1997, leading to a vast network of around 3000 youth volunteers, known as the Youth Tube Volunteer Network (BVN) throughout the country.

Youth Tube would be grateful if you could respond to the following questions as the candidate has listed you as a reference. Your feedback will greatly assist us in determining the most suitable candidate for this job.

#### **Reference Questions**

1. To what extent do you feel the candidate understands specifics of this role?

2. Youth Tube is committed to Preventing Sexual Exploitation & Abuse, safeguarding of children and any type of anti-harassment, do you have any concern about this applicant or sexual misconduct? If yes, please provide details.

3. Has the candidate ever faced disciplinary action? If yes, please provide details.

4. Is there any record of fraudulent activities or criminal cases associated with the candidate? If yes, please provide details.

5. What are the candidate's key strengths and what areas would you say need improvement?

6. Whether you have any other information which is relevant to this reference.

Thank you very much for taking the time to fill this form.

<sup>&</sup>lt;sup>1</sup> Adolescents: 12-19; Youth age bracket in Pakistan: 15-29



# **Annexure 2- Self Declaration Form**

Date: \_\_\_\_\_

**CEO** Youth Tube Lahore

#### Subject: Self-Declaration Regarding Sanctions and Investigations

Respected Sir, I, \_\_\_\_\_\_\_ hereby declare that I am a job candidate applying for a position \_\_\_\_\_\_\_ within your esteemed firm. I am writing this letter to confirm that I have never been subject to any sanctions, be they disciplinary, administrative, or criminal, arising from an investigation related to Sexual Exploitation and Abuse (SEA) in any previous employment or professional engagement.

I further declare that I have never left any previous employment pending investigation nor have I refused to cooperate in any investigation related to SEA or any other misconduct. I understand the serious implications of such actions and affirm that I have always adhered to professional conduct, ethics, and legal responsibilities throughout my career.

In support of this self-declaration, I acknowledge that any false or misleading information provided by me may lead to disqualification from the current job application process or, if discovered later, may result in immediate termination of my employment.

I am fully aware that the firm reserves the right to conduct background checks and verification of the information provided in this self-declaration. I hereby authorize the firm or its authorized representatives to verify my educational qualifications, employment history, and any other relevant information pertaining to this declaration.

Should there be any need for additional information or documentation related to this matter, please do not hesitate to contact me at the contact information provided below.

Thank you for considering my application, and I look forward to the opportunity to contribute to the success of your firm.

Yours sincerely,

Name: \_\_\_\_\_

CNIC#: \_\_\_\_\_

 Contact Number:
 \_\_\_\_\_\_

 Email Address:
 \_\_\_\_\_\_\_