

**Prevention of Sexual Exploitation and Abuse Policy
(PSEA)
The Palestinian Association for Empowerment and Local Development—
REFORM**

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First: Introduction:

The issue of sexual exploitation and harassment is a central issue in any society around the world. In the Palestinian context, this issue has been addressed by many human rights and feminist groups, organizations, and institutions, including REFORM, where various tools have been used to raise issues of sexual violence in both the private and public spheres. Some of these tools include defining and updating definitions of the various aspects of sexual violence crimes, pressing for laws to punish perpetrators, writing research and studies that provide important recommendations in this regard, and striving for serious guarantees of protection and reparation for victims and survivors. In addition to providing various methods of support, whether legal, medical or psychological, documenting the testimonies of victims and survivors, and carrying out various campaigns to highlight and advocate for them in order to reduce and prevent gender-based crimes, and ensure that there is no impunity, as well as submitting draft laws and internal policies to combat these crimes.

In this context, REFORM has drafted its own policy against gender-based exploitation and harassment. Therefore, this policy comes to create an environment that rejects harassment and exploitation based on gender in the institution.

This paper aims to:

- Enhancing guarantees of a decent, healthy and protective work environment for all female workers, promoting the principle of protection, establishing a spirit of learning, and consolidating the principle of respect for the right to physical integrity for all.
- Strengthening the tools of good governance within the institution.
- Empowering women in the work environment.
- Preventive intervention on aspects of power relations based on male superiority
- Strengthening the principle of mental health that leads to an improvement in the level of productivity.

Second: The importance of adopting and implementing an anti-exploitation and harassment policy:

The importance of the policy to combat gender-based exploitation and harassment lies in the following reasons:

1. Ensuring a decent, healthy and safe work environment for members and team members of the institution free from exploitation and harassment.
2. Preserving the dignity and right of all female workers and workers to their psychological and physical safety.
3. Raising awareness of the nature of crimes of exploitation and harassment, as the absence of this knowledge constitutes one of the obstacles facing Palestinian civil society organizations.
4. Enhancing the spirit of collegiality and maintaining the passion of the members of the work team and the beneficiaries of the institution's services for the issues they are working on, and their feeling of non-threatening comfort.
5. Finding a mechanism and reference for complaints regarding issues that may threaten the psychological safety of workers as a result of any bullying appearance based on gender.
6. Reparation for harm and establishing the concept of zero tolerance for sexual crimes and all forms of discrimination.
7. Establishing the values of mutual respect between female and male members of the institution's team and the beneficiaries of the institution's services.
8. Consolidating the culture of the sanctity of the bodies of any of the members of the institution's team and its beneficiaries.

Third: Policy References and Approach:

This policy was based on several references, including the ILO's Anti-Sexual Exploitation and Harassment Policies, the International Union for Conservation of Nature (IUCN), the Canadian Human Rights Commission, and York University's policy against harassment and sexual violence. In addition to other Arab initiatives for protection from sexual violence, the draft of the Bread and Freedom Party, the gender policy of the Social Justice Platform, and the Protection from Sexual Assault and Harassment Policy for Miftah Foundation.

Individual interviews were held with members of the REFORM Association's work team, in addition to a focus group that included members of the Board of Directors, the General Authority and the Executive Management of the Foundation, and a focus group that included human rights and feminist civil society organizations working in the field of protection from violence and gender-based exploitation, to analyze the components and principles of the contents of this policy, the work mechanisms and procedures that must be followed to protect and prevent exploitation and harassment, so that this policy is not

just an internal reference for REFORM Foundation, but also a moral and practical educational model for the rest of civil society institutions.

Fourth: Correspondence with the rules of PSEA policy and the scope of its application:

This policy applies to:

- All members of the REFORM Foundation's work team.
- All female volunteers and volunteers in the institution.
- All those who perform services for the organization freely for a fee (this includes cleaners, translators, proofreaders, consultants, trainers, and others).
- All visitors to the institution, and participants in its activities and events.
- Based on the institution's belief in preserving the dignity and rights of all male and female workers, the policy provisions are also applied to female and male members of the work team in case they commit acts of violence within their families and their partners, including, but not limited to, physical or sexual assault on them. To ensure the safety and security of the work team on the one hand, and the institution's intolerance of the presence of an abusive person within the work team and its violation of basic human rights principles.

Fifth: Mechanisms and Procedures:

Through this document, REFORM seeks to achieve the principles of justice and fairness with full transparency, while preserving the privacy of the parties to each complaint received by the competent committee to receive complaints, whether formal or informal, written or verbal, seriously, and will not resolve them without following the due process that is specified in this document.

The employees of REFORM Association are obliged to cooperate fully in all of the following procedures, in the event that a complaint is filed against any of them, or one of them is asked to testify in an incident under investigation. In the event that the violation under investigation occurred against one of the employees of the institution by one of the direct or indirect beneficiaries and/or partners, the association will work to pay the defendant his/her right to cooperate with the investigation procedures contained in this document.

First: General Rules

- Protection should be provided from any harm or threat to the complainant from the defendant, and this could include granting him/her a paid friendly leave during the investigation period that is not deducted from his/her annual leaves, or a temporary restructuring that ensures no friction exists between the two parties until the end of the

investigation, or suspending the defendant from work until the end of the investigation, or verification.

- The complainant and the defendant should have the opportunity to tell his/her version of the incident under investigation, in appropriate conditions, and each party should be able to see the evidence and documents provided by the other party and give him/her an opportunity to respond to and refute them.
- Persons convicted in investigations conducted under this document will not in the future be part of any commissions formed based on this document.
- Each party has the right to take a colleague with him/her to attend the investigations, to provide the necessary support and advice, but he/she does not have the right to interfere in the progress of the investigations, and he/she must abide by the confidentiality clause.
- It is not permissible in any case to direct any negative comments to anyone who filed a complaint, provided information related to a complaint, or was even convicted of an incident and received the appropriate administrative penalty.
- The association is committed to providing the necessary psychological and social support to the complainants during the investigation period.
- All complaints received by the Complaints Committee should be dealt with seriously, promptly, and with complete transparency.
- The parties to any complaint, witnesses, members of the Complaints Committee and the Investigation Committee, everyone who attends the investigation for any reason, and anyone who peruses the documents related to it, starting from the minutes of the complaints committee meetings and ending with the final result, shall abide by complete confidentiality with regard to the investigations and procedures until the announcement of the final decision. Preserving the privacy of individuals. However, if the investigation results in the defendant's conviction, the matter of confidentiality is up to the complainant's desire to coordinate with the Complaints Committee.
- The two parties of the complaint have the right to know the actions that will be taken respectively.
- The complainant has the right to waive the complaint at any stage as long as the investigation committee continues to meet the parties and witnesses and collect evidence.
- Any attempt by the parties to the lawsuit from among the employees of the institution to influence the investigators will result in administrative penalties.
- Submitting a Complaint: REFORM considers acts of discrimination, bullying, sexual harassment and abuse of power to be dishonorable¹, and therefore we encourage anyone who has been/have been subjected to discrimination, bullying, sexual harassment or abuse of power in the workplace, to submit a verbal or written complaint to any member

¹ : The definition of these terms is found in the Definitions section of this paper, please review it.

of the Complaints Committee or any of the employees of the organization, regardless of when or how this violation occurred.

- A person who witnessed the occurrence of any of these acts can also file an oral complaint with any member of the Complaints Committee, but the Committee or others are not entitled to open any official investigation without the consent of the person against whom the violation occurred.
- REFORM encourages anyone who believes/believes to have been subjected to any of the violations mentioned in this document, to seek advice from any of his colleagues in the institution.
- Within three working days after submitting any complaint, whether oral or written, the Complaints Committee will hold a meeting to discuss its options depending on the nature of the complaint, but in any case, all minutes of meetings, communications, steps and decisions to be taken by the Complaints Committee should be documented in writing. A copy of these minutes shall be kept with the executive director of the institution and shall always be available to members of the complaints committee and to the parties to the complaint.
- Formal Complaint: In order to become official, a complaint must be submitted in writing to the Complaints Committee. If the complainant has any documents or evidence attached, they should be submitted with the complaint and the committee should keep them. Complaints of unknown source, complainant, or without documentation are not considered.
- Receiving the complaint from the complaints committee: After submitting the complaint and ascertaining its seriousness, the committee should first meet with the complainant. After that, it shall meet with the defendant and inform him/her of the content of the complaint, and enable him/her to view it and the evidence and documents submitted, and to hear his/her account of the events freely.

Second: The complaint mechanism and how to deal with it:

Formation and tasks

- The committee is composed of the association's administrative affairs officer, and two members appointed by the general manager. In forming the committee, it should be taken into account that it should be of different administrative levels, and qualitative diversity and balance between males and females are also taken into account.
- In the event that the complaint is filed against the General Director, the Board of Directors shall form a committee from the Board and whomever it deems appropriate.
- The task of this committee will be to receive complaints, and to commit to taking all the measures mentioned in this document in accordance with what will be detailed below.

- Any person has the right to submit a complaint to an email address designated to receive complaints of exploitation, sexual violence, and administrative offences. The email address is available only to members of the investigative committee that deals with complaints of sexual violence and administrative abuse. The Committee shall notify the General Director of the existence of a complaint and the parties to each complaint prior to the commencement of the investigation. In the event that the complaint is directed against one of the members of the investigation committee, it is sent through the e-mail address of the other two members of the committee,
- Photocopies of any conversations or other evidence related to the subject of the complaint can be shared via e-mail, either when the complaint is submitted or after it.
- After submitting a complaint and ascertaining its seriousness, the committee should first meet with its submitter. After that, it must meet with the defendant and inform him/her of the content of the complaint, and enable him/her to review it, the evidence and documents submitted, and listen to his/her account of the events freely.
- Members of the Complaints Committee, the General Director or anyone who has access to the complaint shall abide by the strict confidentiality of the content of the complaint or its submitter, and not share it with anyone else.
- The complaint letter will be answered within a maximum of seven working days, provided that it is preceded by a letter confirming that it has been received and that its content is being investigated.
- The Complaints Committee communicates with the defendant and informs him/her of receiving a complaint against him/her. The committee has the right, based on valid reasons such as the fear that the violation will be repeated or the complainant's exercise of pressure on the complainant or witnesses in the event that the complaint deals with physical violence, sexual assault or a threat to the complainant, to take a decision to suspend the complainant from work temporarily until the completion of the investigation process and the issuance of a final decision in the investigation.
- The defendants are not considered guilty until the investigation process is completed and a conviction decision is issued.
- In the event that the complainant stops working, the work team is notified of the existence of a complaint against him/her without sharing the subject of the complaint or the complainant's data.
- The Complaints Committee prepares its report, sends it to the investigation committee, and sends a copy to the General Director, no later than one week (seven working days).

Third: Formation of the Investigation Committee:

- Members of the investigation committee shall have previous experience in managing similar investigations, provided that these names are neutral with respect to the plaintiff

and the defendant. These names are presented to the plaintiff and the defendant, and this committee should obtain the approval of both the plaintiff and the defendant before the beginning of the investigation

- An investigation committee shall be formed by the General Director, to continue its work for a period of at least one year, consisting of a human resource official and one of the working lawyers/ contractors/ the general body in the institution with experience in the aspects of investigation and its committees.
- The institution is committed to training the members of the investigation committee on the institution's exploitation and harassment policy, and its administrative and financial manual.
- In the event that the complaint is submitted against the General Director, an investigation committee is formed by the Board of Directors, with the membership of whomever it deems appropriate.
- The investigation committee looks into all complaints related to sexual exploitation and violence or administrative violations, and the General Director has the right to assign and/or contract with an expert in gender issues from the institution's management, board of directors and/or general body, to supervise the investigation procedures and review the recommendations and decisions of the investigation committee in cases of sexual violence. The expert on gender issues must meet the conditions of integrity and impartiality, and have previous experience in participating in investigation committees. The expert does not start his/her work in supervising investigations into sexual violence until after his/her nomination is approved by the General Director. Or the board of directors if the complaint is against the General Director.
- The investigation committee communicates with the complainant and the defendant through the e-mail designated for complaints, or in any other way that can be documented.
- All parties shall abide by confidentiality and preserve the privacy of the parties to the investigation.
- The investigation committee meets in the institution, provided that this place is completely free of any person, including members of the institution's work team, and investigation sessions can be held electronically if the complainant has no objection to that, and it does not affect the verification process and the rules of confidentiality and urgency. Specifically, due to the circumstances of the spread of the emerging corona virus (COVID-19).
- Any investigation before the committee must be completed and relevant recommendations and decisions issued within a maximum period of one month since the start of the investigation procedures. The investigation committee may extend this period for a maximum of another month after notifying the investigation parties if there are compelling reasons to do so.

Fourth: Powers and controls for the work and reference of the investigation committee²:

- The investigation committee is responsible for communicating with the complainants and complainants and setting the dates for the investigation sessions.
- The investigation committee is responsible for issuing recommendations for disciplinary penalties in all the incidents that are investigated, and directing them to the executive management of the institution to take the necessary actions regarding the case.
- The committee reserves the right to call any witnesses it deems necessary (if any) to determine its certainty of the result that will be reached.
- Members of the investigation committee are prohibited from discussing the facts or outcomes of the investigation with any other party, including any other institution or group or any individual, whether from the work team members or from outside, after the investigations are completed, in order to preserve the independence of the investigation committee.
- The investigation committee adopts principles and values related to human rights from a perspective responsive to gender justice, justice for children and people with disabilities, such as the right to physical integrity and justice, and also adopts feminist definitions of crimes of sexual violence. disability, and definitions of sexual violence crimes as contained in this policy are adopted.
- If the complainant decides to resort to the judicial authorities, the position of the committee remains neutral and its role ends upon the completion of the internal investigation and the submission of its recommendations.
- It is prohibited to disclose the name of the complainant/e or any details of what was shared with the investigation committee, and all records, recordings or investigation information shall remain strictly confidential. Final records are kept in a locked cabinet in the custody of the General Director.

Fifth: The principles governing the investigation committee and how it works³:

- Investigation procedures are not initiated except after the consent or explicit request of the complainant, and this principle applies in the event that a third party submits a complaint as a witness to the incident. From the survivor or the victim to avoid infringing his/her privacy or canceling his/her will. Exceptions are made to complaints that affect

² : The past experience of the expert who prepared this document was used in various investigation committees, and in the ethics committees that regulate the work of United Nations bodies.

³ : Some elements of this paragraph are taken from the draft policy of the Bread and Freedom Party, the Egyptian Initiative for Personal Rights, The gender policy of the social justice platform and the Protection Handbook of the World Health Organization

the public interest of the institution, provided that the personal investigation aspect is dropped at the request of the complainant.

- Members of the investigation committee should disclose any conflict of interest, if any, before initiating investigation procedures. It signed an acknowledgment letter stating that there was no conflict of interest before starting the investigation procedures, and it is kept in the investigation file.
- In the event that there is a conflict of interest, and/or one of the complaining parties submits evidence to this effect, the General Director shall take the necessary action, and it is prohibited for any member who concealed a conflict of interest in the membership of any investigation/verification committee, in addition to the imposition of the penalty that the director deems appropriate for him/her.
- When the investigation committee assumes its duties, it must document in writing all the actions it takes, and the investigations it conducts should be recorded (audio after obtaining the consent of the parties), and documented, and the complaints committee undertakes the task of collecting and documenting all these documents, until the investigation committee writes its final report.
- Because of the particular nature of incidents of bullying, sexual harassment, abuse of power - authority- and discrimination, the burden of proof does not fall on the complainant, but also not on the defendant. Here, the investigation committee should collect and review facts and documents, review the work records of the complainant, the defendant, and witnesses, and conduct the necessary personal interviews with the parties to the complaint and witnesses.
- Members of the investigation committee may not write the names of the complainants or witnesses in any of the investigation reports or papers, and the data of these parties shall be anonymous and confidential. The members of the investigation committee, the complainant and the defendant shall also sign a data confidentiality form indicating the data that the parties wish not to circulate.
- All investigation papers and reports are kept on paper or electronically in such a way that the data of the complainants and witnesses are unknown, in a secure manner, for the benefit of the various members of the committee, and new members of the committee are not allowed to view the complaints data that preceded his/her joining the committee.
- The names of the defendants shall not be anonymized, in order to maintain a record of previous complaints against them, if any.
- In the event that any of the members of the investigation committee leaks any of the data of the complainant, witnesses or defendant (if the accusation is not proven against him or during the investigation), he/she will be exempted from his/her role in the committee and from investigating any complaints of this kind in the future, and if this violation is proven against the committee member, obliging him/her to apologize, and

then preventing him/her from undertaking any similar investigations in the future. And take the necessary administrative measures related to it.

- Non-disclosure of the gender identities/sexual orientation of the parties to the investigation should be taken into account if they do not expressly express their consent to disclose it.
- The Committee deals with all parties to the complaint in a manner that does not degrade their dignity, mock their feelings, or pass judgments on them, and deals in a manner that responds to all kinds of social and cultural differences, age and disability, and it may seek the assistance of whomever it deems appropriate for the purposes of this without prejudice to the principle of confidentiality and privacy.
- Under no circumstances should the committee delve into personal questions unrelated to the content of the complaint (such as previous relationships, virginity, etc.).
- The committee gives sufficient time to the parties to the complaint and the witnesses before hearing their statements.
- The committee deals sensitively with the complainant and assesses the impact of the incident on his/her psychological state, which may require hearing the testimony during more than one session, or stopping for periods during hearing the testimony, taking into account that the complainant may not remember all the details smoothly or interconnected, etc.
- The committee writes its final report and sends it to the General Director, and thus has completed its task, to take the necessary actions on its basis, provided that the full report remains in the custody of the director general.
- The work of the investigation committee ends at the moment of submitting the case report and its recommendations to the General Director, who in turn has the right to decide whether or not the work of the investigation committee ends in the case under consideration, according to an official letter. It should be noted that the General Director has the right to request the completion of the investigation if Uncertainty about its completeness or its actual end.
- The Director General takes the decision in the foreseeable case, and sends it to the Complaints Committee, which in turn informs it to the parties to the complaint, keeps it in the complaint file, and sends it after closing the complaint to the Director General, who in turn keeps it in custody.

Sixth: Malicious Complaints⁴:

Malicious complaints are defined in this policy as complaints that are confirmed to be “fabricated” or deliberately fabricated by one or several parties, and whose falsity can be

⁴ : The previous reference.

proven by witnesses or digital evidence such as screenshots or a notice of hacking a person's account to send Messages, pictures, materials...etc.

- In the event that the malicious nature of the complaint is proven, and this is a burden that falls on the defendant, and the investigation committee (whether the whole case or part of it reveals the malicious intent) and it should be based on documented evidence that does not accept interpretation, the procedural requirement shall be taken against the malicious plaintiff with the same prescribed procedure for the act that the defendant is accused of committing.

The investigation committee imposes the appropriate penalty on the complainant in case the complaint is proven to be malicious. If the complainant is from outside the institution, and the complaint has taken the direction of public opinion, in this case, the institution has the right to issue a statement clarifying the nature of the case and the measures taken in it, ending with confirmation that it is a malicious complaint.

Complaints that are not in any way proven to be malicious, are not considered. The maliciousness of the complaint is determined only by proof that details or complaints have been intentionally fabricated.

Seventh: Recommendations and their implementation mechanism:

● The recommendations and disciplinary sanctions are represented in the following sequence in implementation of the principle of REFORM and improvement of the work environment explained in the introduction to the policy, and the penalties recommended by the committee are listed below, which become binding on the management of the association and the work team as soon as they are issued:⁵

1. A letter of reprimand.
2. Give a formal attention.
3. Give a formal warning.
4. Suspension of opportunities or outside business.
5. Denial of incentive, salary increase, promotion.
6. Suspension from work for a period not exceeding three months. To be approved by the Board of Directors.
7. Final dismissal without submitting recommendation certificates to apply for new job opportunities. To be approved by the Board of Directors.
8. Final dismissal and declaration of a position that determines the identity of the defendant and the nature of the act. To be approved by the Board of Directors.

⁵ We were guided by the previous references, in addition to the internal regulation, and the administrative guide for REFORM.

9. The institution encourages those who are convicted to apologize to the complainants, and make reparations for their damages.

- The committee takes the necessary measures to improve practices within the association or to suggest new practices that would improve the general environment and establish the principle of safe spaces for the work team, by submitting a final report, after a period of one year from the start of its duties, provided that the report addresses the number, nature and contexts of the complaints seen.
- The penalty must be commensurate with the nature of the complaint and the act committed, with the necessity of tightening the penalty in the event that the act is repeated more than once, or it occurs to a child or a person with a disability. In the event of repetition or recurrence, a final dismissal penalty may be imposed.
- The defendant has the right, during any stage of the investigation, to confess what he has committed and to submit an apology in coordination with the investigation committee, the General Director decides to take the appropriate action, taking into consideration the recommendations of the investigation committee.
- The investigation committee and the administration of the institution shall encourage the defendants who have been proven to have committed any form of sexual violence or discrimination by apologizing to the complainants or victims/survivors, regardless of the gravity of the act committed as a kind of acknowledgment of the error and their acknowledgment of committing the act in question.
- The administration of the institution will not, in any way, tolerate any insinuations or behaviors that would punish the complainants for their complaints, and the necessary measures will be taken towards those who do so.
- The administrative affairs and units responsible for information and communication in the institution ensure the dissemination of this policy, including the available means - tools, and simplify its concepts for the target audience in the institution, to ensure that it reaches all targets in the institution's work, including people with disabilities of various types of disabilities⁶ in addition to the work staff and partners.

Eighth: Appeals:

Either party to the complaint has the right to appeal the final report submitted by the committee before the director of the institution, or the Board of Directors in the event that the complaint was submitted against the General Director, provided that the request clarifies what the applicant deems to be errors committed by the investigation committee or the complaints committee, or attach any new evidence The Commission of Inquiry did not have access to. The appeal must be in writing, as well as the response to it.

⁶ : Types of disability and their definition is found in an appendix to this paper, please review it.

All female workers, employees, and volunteers in the institution sign the policy against exploitation and harassment and abide by all its provisions. Members of the General Assembly and the Board of Directors are also bound by its provisions.

To submit a complaint to the Complaints Committee, the following e-mail must be sent to: complaints@REFORM.org,

View the attached complaint form to help write it and/or fill out the form and/or link to the complaint form, after automating it.

Sixth: Definitions Annex:

There is a need to define certain terms closely related to crimes of sexual violence and exploitation and the context in which they occur. The following definitions depend on those adopted by institutions and groups working in the public sphere, women, children and persons with disabilities, namely:

- **Safe space:** A space in which everyone feels both safe and comfortable, and can express themselves within this space without fear of being subjected to verbal, physical, sexual, or electronic violence, defamation, ridicule, exploitation, or arrangement no consequences for this expression, as well as access through this space to secure and non-discriminatory services.

- **Public space:** The space in which a number of people share to discuss public matters of importance to them (Such as the political and social system, the meaning of citizenship, and economic policy). This space can be considered the main space in which public opinion is formed, consisting of trends diverse opinions. In other words, the public sphere is supposed to be a free and not exclusive space, a space for collective participation based on political and social equality⁷.

- **The private sphere - space:** Related to private social life. It is worth noting that a feminist criticizes the separation between the private and the public due to the wrong and patriarchal establishment that public life belongs to men and they have the right to exist in it, while private life belongs to women and the roles that are cast on them societally and which depend on patriarchal and patriarchal ideas that give power to men and create an imbalance in the power relations between women and men.

⁷ Public space: <https://genderiyya.xyz/wiki>

- **Employees:** They are all those who work for the institution full-time or part-time, under fixed-term or indefinite-term contracts or training contracts.
- **Place of work:** The workplace intended in this document is every headquarters managed by REFORM, and every place that witnesses a meeting attended by any REFORM employee or volunteer and/or member of a General Assembly and/or Board of Directors, in his/her capacity as such. This includes conferences, off-site business meetings, training courses, travel trips and also social gatherings among colleagues.
- **Discrimination:** Any unequal treatment, including acts of exclusion, restriction, or preference, made on the basis of age, gender, color, race, religious convictions, social and class backgrounds, sexual orientation, personal relationships, political opinions, disability and other grounds. Unprofessional discrimination includes any preference or exclusion that may adversely affect the principles of equal opportunity, fairness and the right of every employee to appreciate his work without regard to any other factors.
- **Abuse of authority:** It is every improper use of a position of influence within the organization directed against another person/s, in a way that affects his/her work conditions, and in a way that includes transgressing the job roles and tasks of the person who abuses his/her authority. Abuse of power includes, but is not limited to, pressure on colleagues, intimidation, threats, blackmail, coercion, and others. It is required that these acts come from a person whose colleagues believe that he/she has a direct or indirect influence on their working conditions and their future within the association.
- **Bullying:** Any harassment of a non-sexual nature, including any offensive or critical behavior that is not related to or related to the conduct of work but is carried out in an inappropriate manner that degrades the dignity and dignity of the person against whom the bullying or harassment occurs, and creates an unfair work environment; Negatively affect the performance of individuals and the consistency of workflow. Directing comments in the cyberspace to the spaces provided by REFORM in particular, should be in a professional and abstract manner, not include any notes beyond what is required by the work and the work environment, and should not include any personal comments.
- **Sexual harassment⁸:** Any kind of unwanted actions, words, or looks of a sexual nature that violate the body, privacy or feelings of a person and make him/her feel uncomfortable, threatened, insecure, fearful, or disrespected; or to intimidate, insult, abuse, intimidate or abuse. It is any undesirable, unwelcome, non-reciprocal or

⁸ : These definitions are based on the international definitions contained in the International Manuals of the International Labor Organization, UNW and UNFPA on the issues of sexual harassment and gender-based violence.

inappropriate behavior or suggestion of a sexual nature. Determining the sexual nature of the unacceptable behavior is limited to the person who has committed this behavior, provided that it is consistent with the objective viewpoint in describing this behavior.

Forms of sexual harassment

Sexual Visual Harassment:

- Inspection: Staring or looking inappropriately at someone's body(s).
- Facial expressions: Make any kind of facial expression that has a sexual suggestion/implication (such as licking, winking, opening the mouth).

Verbal sexual harassment:

Any unwelcome comment related to the employee's appearance, or his/her personal life, behavior, inclinations and choices, and all continuous attempts at rapprochement that do not take into account the various manifestations of rejection, and all conversations that deal with sex in any way as long as it does not meet the consent of the party the other.

- Calls: Whistling, screaming, whispering, and any kind of sexually suggestive sound.
- Comments: Making sexual remarks about someone's body, clothes, or the way they walk/behave/work.
- Shows unwelcome interest, insists on dating/requests a phone number/invites to dinner or other proposals that may be implicitly or explicitly sexual in nature.
- Solicitation of sex: Requesting sex, describing sexual practices or sexual fantasies.

These acts may be practiced face-to-face, via phone calls, text messages, or over the Internet, and electronic harassment may include, in addition to the above actions, sending messages and/or inappropriate/sexually shaped pictures and videos via e-mail, instant messaging, social media, and forums. blogs, or online chat sites.

Physical sexual harassment:

It may be physical and this includes all kinds of intentional, unwanted contact.

- Touch: Touching, groping, stinging, rubbing, getting too close, grabbing, pulling, and any kind of unwelcome body or body touching toward someone.
- Nudity: Showing intimate parts of the body in front of someone without their consent.

Group sexual harassment:

This includes sexual harassment as described above if it is committed by more than one person against one or more individuals.

Stalking or tracing:

Tracking someone, near or at a distance, walking or using a car, frequently or once, or waiting outside someone's workplace/home/car, stalking/tracking can be electronic.

Sexual defamation:

Publishing, leaking, or promoting consensual conversations, or personal and/or sexual images on any public means of communication, or broadcasting information, secrets, or rumors about a person's personal or sexual relations.

Sexual blackmail:

Threatening someone to disclose information about him/her or harming them in any way to obtain a sexual advantage or threatening someone with sexual images or conversations in order to obtain an advantage (physical, sexual, etc.).

Sexual assault:

Performing sexual acts towards someone such as forced kissing, stripping, or holding/tugging intimate parts of the body without their consent.

Mass sexual assaults:

Sexual assault perpetrated by groups of people against a person or group of people.

Rape:

Using body parts or other objects and tools for oral, anal, or vaginal penetration, partially or completely, without their consent.

Gang rape:

Rape perpetrated by a group of people against single people.

Intimidation:

Threatening any kind of sexual harassment, sexual assault or rape, whether or not this resulted in the act being committed. Intimidation here means causing the other person to feel fear of any kind of sexual violence by using indirect gestures, gestures, words or actions, without using any weapons or causing sexual violence or physical harm.

- Abuse of power/influence/position:

Improper use of a position of influence, authority or power against another person to solicit or imply sexual intimacy, which may be expressly or implicitly not allowing the person to refuse or express disapproval freely or to make sexual demands in exchange for the performance of works or other benefits and services. Sexual harassment may be accompanied by the abuse of power if the victim believes that the offender has a direct impact on his working conditions and future within the institution.

- The concept of satisfaction varies according to the context and is not evaluated by explicit refusal only, but there are several factors that affect it, for example, but not limited to: the existence of unequal / just power relations between the complainant / the complainant / who does not allow the complainant to refuse freely and causes Feelings of discomfort, awareness of the complainant during the act, a history of violence and/or threats between the complainant and the complainant, etc. There is also the factor of surprise, which is not followed by an 'outright' reaction as those who are violated freeze or freeze. It is worth noting that the role of the Sexual Violence Complaints Committee is to make an adequate effort to infer indicators/evidences of consent or lack thereof.

-The cases of sexual violence defined above include any of the cases of sexual violence, assault and intimidation, regardless of the gender identity of the perpetrator and the reality on him, and all the aforementioned definitions apply to all gender identities and sexual orientations.

Annex 1: Complaint Form

Complaint Request Form:		Complaint No.	
Section one: Complainant's data			
Complainant's full name		: ID number:	
Gender: (for individuals only):	Male	Female	
Name of the institution submitting the complaint:/its representative, attorney			
Address: Governorate (name), city (name), town (name), village (name), camp (name)			
Adjective: legal, personal, agent, custodian, guardian			
If the complainant is a person with a disability, we mention / indicate the type of disability (to be classified) ⁹ Communication Disability, Hearing Disability, Visual Disability, Mobility and Hand Use Disability, Slow Learning Disability, Memory and Concentration Disability, Mental Health Disability			
Age: Individuals (classified according to the programming of numbers)	Date of birth: Classified according to the programming of dates		
Phone number	Fax number		
Email	mobile number		
Section Two: About the Complaint			
The subject of the complaint	They are classified: according to the definitions included in the policy (sexual harassment: verbal harassment, electronic harassment, physical sexual harassment,		
The accused party/Defendant	Employee, volunteer, general assembly member, board member.		
The name	Place of residence:		
Is the complaint related to a case pending before the judiciary / Yes, no	If yes, case number If the answer is yes, here the complaint is rejected until the completion of the judicial procedure, and after the completion of the		

⁹ : National definitions and classifications approved and adopted by the Palestinian Central Bureau of Statistics, the Ministry of Social Affairs and using the narrow definition of approving the classification of the World Health Organization and the Washington Disability Group. Annex to its definition, and the complaints and organization staff are trained on it.

	judicial procedure and obtaining a final judgment, the necessary administrative measures mentioned in these regulations are taken, even if the complaint is submitted by a child or a person with a disability, it is important to help the child ,the person with a disability, according to the type of his disability, to fill in this item and clarify it by the Complaints Committee in an easy, clear and understandable language.
Is the subject of the complaint related to a service: No, yes	If the answer is yes: we mention the type of service (it is possible to classify the types of services in the institution here, a meeting, a workshop, a training, a publication, ... and leave an unclassified item, to be classified later as a periodic development of the model from the Complaints and Information Technology Committee), Even if the complaint is submitted by a child and/or a person with a disability, it is important to help the child/person with a disability, according to the type of disability, in filling out this item and clarifying it by the Complaints Committee in an easy, clear and understandable language.
Has a final court ruling ever been issued on the subject of the complaint? No, yes	If yes (date of issuance of the decision) The Complaints Unit collects data if a decision is taken in the complaint or it is rejected by the Complaints Unit, or a final court ruling is issued on its subject. The reasons for the response Even if the complaint is submitted by a child and/or a person with a disability, it is important to help the child/person with a disability, according to the type of disability, in filling out this item and clarifying it by the Complaints Committee in an easy, clear and understandable language.
Have you previously filed a complaint on the same subject: Yes / No	Name of the party against which the complaint was previously submitted..... Date of submission //

	<p>Did you receive a response to your previous complaint: Yes, date of response ... / .../?</p> <p>Even if the complaint is submitted by a child and/or a person with a disability, it is important to help the child/person with a disability, according to the type of disability, in filling out this item and clarifying it by the Complaints Committee in an easy, clear and understandable language.</p>
Facts of the complaint	<p>Let's describe what happened, where, with whom, when</p> <p>It is important for the complaints committee to verify the facts of the complaint, in terms of the date, place and details of the event in question and the complained party, and here it clarifies it to the complaining party and writes its recommendation to accept or reject the complaint to the executive director and the investigation committee, and inform the complainant based on the decision of the director general and the investigation committee.</p> <p>Even if the complaint is submitted by a child and/or a person with a disability, it is important to help the child/person, according to the type of disability, in filling out this item and clarifying it by the complaints committee in an easy, clear and understandable language.</p>
Section Three: Complaint Attachments (Documents and Pictures)	
1.	
2.	
3.	
<p>I confirm, I, the complainant (.....) declare that the above information, data and attachments, is true and true information, data and attachments, and I commit and pledge to bear full legal responsibility if it turns out otherwise, at any time, or if it turns out that the complaint submitted by me is malicious, and I sign it.</p>	
Signatures	

Signature and/or fingerprint of the complainant:		
Signature and/or fingerprint of the person with whom the complainant used to write the complaint:		
The name of the witness to the fingerprint: Identification Number:		
Name of the employee receiving the complaint:		
Signature of the employee receiving the complaint: Date of receipt of the complaint: / .../		
Fourth Section: (Special for the use of the Complaints Committee)		
Complaint Recommendation: <table border="1" style="display: inline-table; border-collapse: collapse;"> <tr> <td style="width: 50%;"></td> <td style="width: 50%;">Accept, reject (using the form below)</td> </tr> </table>		Accept, reject (using the form below)
	Accept, reject (using the form below)	
.....		

The items below are for the use of the Complaints Committee, and in the event that the complaint is submitted by a child, and/or a person with a disability, it is important to help the child/person with a disability, according to the type of his disability, in filling out this item and clarifying it by the Complaints Committee in an easy, clear and understandable language.

If the complaint is rejected, specify the reason for rejection from among the reasons mentioned in the following table:

The reason for rejecting the complaint	indicate with a tick (x).
The subject of the complaint is before the court	
A final court ruling was issued in which a judge acquitted the defendant	
Previously rejected or previously decided upon by the Complaints Committee, and the General Director	
The complaint is malicious	
anonymous	

The facts in the complaint do not indicate the existence of abuse under the provisions of the PSEA Policy, and are not malicious	
Not classified (to categorize the reasons for refusal later and develop the form by the Complaints and Information Technology Unit)	

If the complaint is accepted, select the case to which it applies from among the cases of foreseen complaints mentioned in the following table:

Cases of visible complaints	Mark (X)
Complaint against the conduct of employee	
Complaint against the conduct of volunteer b	
Complaint against the conduct of a general assembly member	
Complaint against the conduct of a board member	
A complaint from civil society organizations related to the behavior of an employee The type and nature of the behavior submitted in the complaint (physical sexual harassment, verbal sexual harassment, theoretical sexual harassment, sexual blackmail, sexual defamation, bullying, exploitation, discrimination on the basis of: gender, disability, religious belief, political opinion) It is classified from the complaints committee in cooperation with information technology	
Uncategorized/ unclassified	

Form 2: Internal Complaint Follow-up Procedures

Complaint number		
Complainant's name		
Section one: Follow-ups		
Procedure date	Action/ Procedure	Notes
Section Two: Appendices and New Documents on the Complaint Under Follow-up:		

Document subject	Date	Notes and signature of the Complaints Committee
The third section: the results of the follow-ups:		
.....		
.....		
.....		
.....		
Signature		Date

Form No. 3: Closing the complaint

Complaint number	Date of complaint
Complainant's name	
The character of the complainant	
The subject of the complaint	
Follow-ups made regarding the complaint:	1.....

	2.....

	3.....
.....	
4.....	
.....	
5.....	
.....	
Responses received	1.....

regarding the complaint:	2..... 3.....
Reasons for closing the complaint:	1..... 2..... 3.....
Closing date	Complaints Committee

Form No. 4: Re-opening the complaint

Section One: Information about the previous complaint	
Complaint number	Date of complaint
Complainant's name	
The subject of the complaint	
The party against which the complaint is filed	
Previous closing date of the complaint:	
Complainant's name	
Section Two: Information on the New Complaint	
The party that requested the reopening of the complaint file	
Complaint number	
The date the complaint was reopened (submission of the complaint)	
Complainant	
The subject of the complaint	
The party against which the complaint is filed	
Reasons for reopening the complaint	

Annex 2: Definitions Related to Disability

National definitions and classifications approved and adopted by the Palestinian Central Bureau of Statistics, the Ministry of Social Affairs and using the narrow definition of

adopting the classification of the World Health Organization and the Washington Disability Group.

1. A communication disability is defined as: “The inability of a person to exchange information and ideas with others and deal with them through the use of speech, pointing, movement or writing of information they wish to exchange with others. This may be a result of a hearing or speech impairment, or the mental inability to interpret and perceive what others say, in terms of signs, words, and movements.”

2. People with a hearing impairment are defined as: “People who have some difficult hearing problems that contribute to limiting their ability to perform any part and aspect in their daily performance, such as the difficulty of hearing a person speaking in a crowded and noisy place, or unable to hear a person Talk to him directly and in a normal voice (without screaming, or loud), and determine who cannot hear with one or both ears.”

3. The visually impaired are: “People who have some difficult vision problems that limit their ability to perform their daily duties, for example, he/she may not be able to read, such as reading signs on street signs while driving a car, and he/she may not be able to see with one eye well. He/she may not be able to see what is on the sides, meaning that any vision problem they consider difficult must be identified and limited. All individuals ask whether the individual wears glasses or not, and those who wear glasses or medical lenses must be reminded if he/she suffers from difficulties in Vision.”

4. People with movement and use disabilities are: “People who have some difficult problems in moving and walking around, which may limit or not enable them to perform their daily activities, for example, they may find it difficult to walk a short distance, or have a problem going up and down stairs, stairs and areas.” Difficult, unable to walk any distance without resting or stopping, or unable to walk without relying on a cane, crutch or treadmills, or unable to stand on feet for more than a minute and needs a wheelchair to move from one place to another. This difficulty/disability includes individuals Those who have difficulties in moving inside or outside the house, as well as walking for periods of more than 15 minutes, as well as using hands and fingers to hold tools or writing, etc., and raising 2 liters of water at eye level using hands.

5. People with “slow learning disability/disability”, which is defined as: “The inability of a person to understand things or deal with others. This includes individuals who suffer from difficulties in mental functions related to conditions of brain injury with a disease or defect, as well as individuals who suffer from autism, and individuals who find it difficult to learn daily life skills such as reading, writing and using simple tools.

6. Impairment of remembering and concentration is the “Difficulty in remembering, concentrating, making decisions, understanding speech, reading something written, recognizing people, inferring areas and using a map, arithmetic operations, reading and thinking, such as people who have difficulty understanding and perceiving to do daily activities, for example Finds it difficult to infer about home and places around the world,

can't focus on what he/she is doing, forgets where he/she is, or remembers the month or the previous one, does not understand what someone has said, forgets to take medicine or does not eat, does not understand and knows what is going on around him. It also includes a person's inability to understand things or interact with others."

7. Mental health disability, which refers to "people who suffer from stress, anxiety, doubt and excessive nervousness, as well as have difficulties in performing their daily activities, due to drug abuse, addiction and alcohol consumption."