

EUROPEAN FOREST INSTITUTE
POLICY ON THE PREVENTION OF SEXUAL EXPLOITATION,
SEXUAL ABUSE, AND SEXUAL HARASSMENT (SEAH)

**AS DECIDED BY THE BOARD OF THE EUROPEAN FOREST INSTITUTE
16 SEPTEMBER 2025, TO COME INTO FORCE 1 JANUARY 2026**

1. Scope

European Forest Institute (EFI) is committed to providing a safe, respectful, and inclusive working environment free from sexual exploitation, sexual abuse, sexual harassment, and sexual corruption.

For the purposes of this policy the following definitions apply:

- **SEAH:** Any form of sexual exploitation, abuse, harassment, or corruption, as defined below
- **Sexual exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another person. This includes transactional sex, solicitation for sexual favors, and exploitative relationships.
- **Sexual abuse:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes unwanted kissing, touching, or any sexual activity with a minor.
- **Sexual harassment:** Any form of unwanted verbal, non-verbal or physical conduct of a sexual nature that creates an intimidating, hostile, degrading, humiliating, or offensive environment. This includes, but is not limited to:
 - Physical conduct: Unwelcome touching, blocking, or unnecessary close proximity.
 - Verbal conduct: Sexual comments, jokes, unwanted invitations, or intrusive questions about a person's private life.
 - Non-verbal conduct: Display of sexually explicit materials, suggestive gestures, whistling, or leering.
- **Sexual corruption:** A form of corruption and gender-based violence where an individual in a position of authority abuses that position to obtain sexual favors in exchange for services or benefits, reinforcing power imbalances and violating human rights.

EFI upholds a zero-tolerance approach to SEAH and is committed to taking appropriate actions for prevention, reporting, and response.

2. Core principles

- I. SEAH constitutes an act of gross misconduct and is therefore grounds for termination of employment.
- II. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense.

- III. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes the exchange of assistance that is due to beneficiaries.
- IV. Any sexual relationship with a beneficiary that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of the work we do.
- V. All concerns or suspicions regarding sexual abuse or exploitation must be reported via established reporting mechanisms.
- VI. Everyone is obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Supervisors at all levels have responsibilities to support and develop systems which maintain this environment.

3. Risk rating of positions

All positions for employees and in-house consultants at EFI will be SEAH risk rated in accordance with procedures set up by the Administration unit, with positions rated as low, medium or high risk.

The risk rating of a position will be regularly revisited as part of the Performance & Development Discussion (PDD).

4. Preventive measures

4.1. Safe recruitment

As outlined in *EFI recruitment instructions*, EFI takes proactive steps to prevent individuals with a history of misconduct from being recruited to SEAH high risk rated positions:

- Job postings: All job postings will include a clear statement on EFI's commitment to safeguarding against SEAH.
- Reference and gap checks: For preferred candidates, EFI requires references for up to five years of recent work history.
- Self-declaration: Preferred candidates must complete a form detailing any past SEAH convictions or disciplinary actions. EFI may in addition to this require an official certificate confirming the absence of convictions for sexual offences or an extract from criminal records.
- Interview questions: Interviews assess shortlisted candidates' awareness of SEAH and their ability to recognize and report concerns
- Verification: Preferred candidates must provide identity documents as further instructed by EFI.

Negative outcome of reference checks, self-declaration, interview, verification, or check of criminal records, will stop recruitment/engagement of the person.

Candidates must acknowledge having read and understood this policy before starting employment or engagement as an in-house consultant.

4.2. Awareness training

EFI will provide mandatory SEAH training as part of the induction process for all new employees and in-house consultants.

All employees and in-house consultants will be required to participate in refresher training to reinforce awareness and promote a respectful and safe work environment. These sessions will be conducted on a regular basis and will go beyond basic information to encourage shifts in attitudes and behaviour. Training may include bystander training on how to address disrespectful behaviour, as well as training on the root causes and impacts of gender-based violence and harassment in the workplace.

For employees and in-house consultants in high risk rated positions, additional specialized training will be provided. Such training will focus on recognizing SEAH risks, safeguarding vulnerable groups, understanding project-specific complexities, and applying survivor-centred approaches to prevention and response, ensuring a safe and respectful environment.

4.3. Contractors and Grant beneficiaries

Contractual agreements with contractors and grant beneficiaries will include clauses prohibiting SEAH.

4.4. Risk mitigation

If SEAH risks are identified within any of the operations or activities of EFI, action will be taken to develop and implement mitigation strategies, maintaining a safe and respectful environment for all persons involved. Risk identification will be informed by the EFI SEAH risk rating tool, and mitigation measures will be proportionate to the assessed risk level, taking into account factors such as proximity to vulnerable populations, power imbalances, and control of resources.

5. Reporting and investigation procedures

5.1. Raising a complaint

Complaints can be raised either by addressing it to the Head of Administration or by using the EFI whistleblowing reporting system, which is designed to safeguard the whistleblower's identity and safety. SEAH-related complaints may be submitted anonymously through the EFI whistleblowing reporting system.

Further information on whistleblowing can be found in *EFI Whistleblowing policy*.

5.2. Investigation

For complaints addressed to the Head of Administration, an impartial investigation will be conducted. In relation to the Director, the Board will decide, and for all other matters the Director will decide. It may involve interviews with the complainant, alleged perpetrator, and witnesses.

Investigations will be conducted with due regard to confidentiality, sensitivity, and timeliness, respecting the privacy of all involved parties.

EFI may engage external parties as required to conduct the investigation.

5.3. Outcome and disciplinary measures

If a complaint is upheld, disciplinary measures may range from a request to cease the behaviour and issuing of appropriate warnings, to termination of employment in accordance with EFI staff regulations.

Appropriate disciplinary measures will be determined based on a comprehensive assessment of the situation, including the severity of the violation, the impact on the victim and workplace, and any previous disciplinary history of the harasser.

The disciplinary process will ensure that the views of those affected are considered.

Additionally, EFI may report to national authorities for legal action, or refer to law enforcement, depending on the seriousness of the offense.

6. Care and support for victims

EFI places a high priority on care and support for victims of SEAH. The Institute is committed to offering timely, appropriate, and comprehensive assistance to SEAH victims. This includes the provision of medical and psychological services, as well as ongoing support for recovery and reintegration, based on the specific needs of the victim.

EFI is committed to ensuring:

- Confidentiality and anonymity to protect the identity of victims
- Access to emotional, psychological, and health services/medical care, including post-complaint support
- Assistance for victims to understand their rights
- A victim-centred approach where victims are empowered to make decisions about their care and are provided with relocation or reassignment options if necessary and possible.

Protocols for assistance and referrals for SEAH victims will be established to ensure that survivors of SEAH receive immediate and appropriate care.

7. Monitoring and evaluation

EFI recognizes the importance of monitoring the effectiveness of this policy and will collect statistics and data to enable relevant analysis.

This policy will regularly be reviewed by the Administration unit to ensure its proper application and that it remains effective. This will include:

- Collect and make available anonymized data on SEAH incidents, response actions, and policy compliance annually

- Review and assess recruitment, training, and support mechanisms to ensure policy adherence and effectiveness
- Update this policy based on evolving best practices and staff feedback

To safeguard all individuals during monitoring, external expertise will be consulted where necessary.