



# Lumos Global Protection from Sexual Exploitation and Abuse (PSEA) Policy

Owner:	Global Safeguarding Lead
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## 1. Introduction and Scope

As set out in the *Global Safeguarding Policy* Lumos has a zero-tolerance approach to all forms of harm, abuse and exploitation and is committed to the principle of “Do No Harm” across all our work. This policy, aligned with the Global Safeguarding Policy, sets out the specific expectations for all staff, associates, partners and contractors in relation to Protection from Sexual Exploitation and Abuse (PSEA), including implementation, monitoring and response. This policy, along with the Code of Conduct and Global Safeguarding Policy, sit under Lumos’ Duty of Care framework.

Sexual exploitation and abuse (SEA) are grave violations of human rights. While SEA can happen anywhere and at any time, Lumos recognises the power imbalances involved in delivering aid, support and programmes across a range of fragile contexts and how these imbalances lead to heightened protection risks. Lumos is committed to implementing and enforcing clear systems and controls to help prevent exploitation and abuse, and where necessary, to respond to concerns, across all our work, including within our partnerships and supply chains. This PSEA policy, as well as the accompanying guidance set out in the Global Safeguarding Policy, aim to prevent/reduce the risk of SEA, raise awareness of SEA and reporting mechanisms, and to ensure any identified concerns are addressed quickly, sensitively and appropriately, using a trauma informed and survivor-centred approach. Where the guidance in this policy conflicts with any applicable laws or regulations, the higher standard shall be observed at all times.

The conduct expectations for staff, associates, partners and contractors set out in Lumos policies, including on PSEA, applies at all times, both during and outside working hours, as outlined in Lumos *Code of Conduct*. This policy should be shared alongside Lumos wider Safeguarding Policy to ensure a thorough understanding and shared commitment to inclusive and respectful environments that prevent SEA as well as other forms of harm and abuse.

## 2. Definitions

**PSEA** is a type of safeguarding that focuses on the protection of adults (anyone over the age of 18) from sexual exploitation and abuse, particularly from humanitarian or development actors. PSEA encompasses both direct and indirect programme participants, including wider members of the community wherever

Lumos or our representatives operate. Children (anyone under the age of 18) can also experience sexual exploitation and abuse. Lumos safeguarding procedures relating to child sexual abuse and exploitation are set out in the *Global Safeguarding Policy*.

**Exploitation** involves the use or attempted use of a power imbalance or relationship of trust to coerce, manipulate or deceive a person for sexual, monetary, political, social or personal gain and is a type of abuse. This can include sexual exploitation and commercial exploitation (forced labour/child labour) and trafficking. Survivors of exploitation may not always recognise that they are experiencing abuse or harm and may appear to be “consenting.” The appearance of consent or willingness to engage in the exploitative activity does not mean that the child/adult is not at risk or has not experienced exploitation, harm and abuse.

**Sexual Abuse** is defined as ‘the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions’<sup>1</sup>. For example, forcing, coercing or enticing a person to take part in sexual activities or engage in behaviours for a perpetrator’s sexual gratification. This may include, but is not limited to, rape, oral sex, penetration, masturbation, kissing, rubbing or touching. It may also involve showing or producing sexual images or activities or encouraging sexually inappropriate behaviour.

**Sexual Exploitation** is a type of sexual abuse. It is defined as ‘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.’<sup>2</sup> Sexual exploitation can be perpetrated by anyone, anywhere, including Lumos staff, associates, partners, government staff or by staff of other NGOs.

**Sexual Harassment**<sup>3</sup> is a type of sexual abuse and encompasses any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another. While typically involving a pattern of behaviour, it can take the form of a single incident. Sexual harassment and abuse may occur between anyone.

**Buying Sex** refers to the exchange of sex for money or other goods or services. Lumos strictly prohibits staff and associates from buying sex because of the unequal power dynamics and risk of sexual exploitation and abuse.

**Sexual Favours** are any sexual or sexualised acts that are asked for in exchange for something such as money, goods, services, opportunities, etc. This also includes any demands for inappropriate photographs, video and exposure to pornography.<sup>4</sup>

**Relationships with Programme Participants** refers to relationships between Lumos staff and associates with people engaged in Lumos programming. Under no circumstances may Lumos staff, associates, or partners pursue sexual or romantic relationships with community members where Lumos is delivering aid or services.

**Grooming** is the cultivation of emotional relationships with those in positions of vulnerability or inequitable power with the intention of manipulating these relationships into sexualised dynamics in the future.<sup>5</sup>

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<sup>1</sup> <https://www.unhcr.org/uk/protection/operations/405ac6614/secretary-generals-bulletin-special-measures-protection-sexual-exploitation.html>

<sup>2</sup> <https://www.unhcr.org/uk/protection/operations/405ac6614/secretary-generals-bulletin-special-measures-protection-sexual-exploitation.html>

<sup>3</sup> For information on managing sexual harassment in the workplace between colleagues, please see Lumos Global Prevention of Sexual Harassment in the Workplace Policy.

<sup>4</sup> [https://www.savethechildren.net/sites/www.savethechildren.net/files/SCI\\_HR\\_POL\\_PSEA%20External%20policy\\_EN.docx.pdf](https://www.savethechildren.net/sites/www.savethechildren.net/files/SCI_HR_POL_PSEA%20External%20policy_EN.docx.pdf)

<sup>5</sup> [https://www.savethechildren.net/sites/www.savethechildren.net/files/SCI\\_HR\\_POL\\_PSEA%20External%20policy\\_EN.docx.pdf](https://www.savethechildren.net/sites/www.savethechildren.net/files/SCI_HR_POL_PSEA%20External%20policy_EN.docx.pdf)

**Trauma Informed Care** is an approach that takes in to account the widespread impact of trauma, including past or recent instances of harm, abuse or exploitation when providing care and support to any individual. A trauma informed approach seeks to actively avoid re-traumatisation by ensuring the individual and their best interests, needs, wishes and feelings are at the centre of all decision making. Safety, empowerment, collaboration and choice are key principles. Lumos is committed to integrating knowledge about trauma and its impact in to our policies, procedures and practices to help ensure sensitive and appropriate responses to any concerns.<sup>6</sup>

**A Survivor-Centred Approach** is a way of engaging with survivors that prioritises listening, avoids re-traumatisation and systematically focuses on their safety, rights, well-being, expressed needs and choices. The purpose is to give back as much control to survivors as feasible and ensure empathetic delivery of services in a non-judgemental manner.<sup>7</sup>

### 3. Lumos Conduct Expectations for PSEA

Lumos wider safeguarding and conduct expectations, including on PSEA, are set out in the *Global Safeguarding Policy* and *Code of Conduct* and apply to all staff, associates, partners and contractors at all times. Lumos is committed to UN and other international standards including the IASC Core Principles on Protection from Sexual Exploitation and Abuse (PSEA).<sup>8</sup>

**This includes the following principles and expectations:**

- Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
- 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 defence.
- 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 exchange of assistance that is due to beneficiaries.
- Any sexual relationship between those providing humanitarian assistance and protection and a person benefitting from such humanitarian assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.
- Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
- Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

These principles and conduct expectations, including a clear prohibition on buying sex (regardless of the legality in the host country) or using aid or goods to elicit sexual favours, behaviours related to grooming, sexual harassment and/or misconduct and abuse of power are clearly set out in the *Global Safeguarding Policy* and *Code of Conduct*. All staff, associates, partners and contractors shall be made aware of these expectations and Lumos commitment to PSEA and safeguarding throughout all our work. Appropriate and proportionate training, awareness raising and where necessary, capacity building for safeguarding and

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<sup>6</sup> <https://www.traumainformedcare.chcs.org/what-is-trauma-informed-care/>

<sup>7</sup> <https://www.unhcr.org/en-us/survivor-care.html>

<sup>8</sup> <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>

PSEA, will be built in to activities to ensure safe implementation of Lumos activities. See the Global Safeguarding Policy and Safeguarding Due Diligence Framework for additional information and guidance.

#### 4. Lumos Approach to PSEA Implementation, Monitoring and Response

Just as with all types of safeguarding under our Global Policy, Lumos take seriously its commitment to PSEA, ensuring that there are robust systems to operationalise effective implementation, monitoring and response. Lumos approach to PSEA is summarised below. Note that this information is derived from the *Global Safeguarding Policy*, which acts as the overarching policy and guidance document.

While everyone has a role to play in PSEA, Leadership, Country Directors, managers and Designated Safeguarding Leads have additional responsibilities to model appropriate behaviours and good practice, as well as promote a culture of respect, safety and inclusion. Further details on roles and responsibilities can be found in the Lumos *Global Safeguarding Policy*.

**Prevention:** Lumos is committed to preventing SEA through a number of processes and activities. This includes safer recruitment practices, vetting and background checks including under the Interagency Misconduct Scheme. Safeguarding risk assessments are conducted and regularly reviewed for all activities involving contact with children, adults at risk, programme participants, and/or the wider community.

**Awareness:** All staff and associates and where appropriate, partners and contractors, receive information and training on PSEA including clear information on expectations relating to conduct, what constitutes a concern and how/where to report. Via awareness raising materials (leaflets, posters, verbal briefings, etc.) Lumos also ensures that programme participants are aware of the high standards of behaviour and conduct Lumos expects of its staff, associates, partners and contractors and what behaviours constitute abuse, exploitation and/or harm and how they can be safely reported.

**Reporting:** Lumos seeks to develop and raise awareness of accessible reporting mechanisms for all its programmatic activities, helping ensure concerns relating to PSEA can be confidently reported. These mechanisms must be culturally appropriate, safe, and accessible for all. All staff, associates, partners, contractors and programme participants are encouraged to report actual or suspected incidents relating to Lumos or any other humanitarian actors.

**Responding:** Lumos has clear processes in place for reporting and escalation of PSEA and other safeguarding concerns under the Global Safeguarding Policy. All concerns are taken seriously with immediate action taken to address reports, including ensuring the safety and well-being of the affected person(s) and any required investigation, disciplinary action, termination and/or reporting to external agencies for perpetrator(s). Lumos has a zero-tolerance approach to all forms of abuse and harm, including SEA. Lumos is committed to holding its staff, associates, partners and contractors accountable and will hold everyone to the same standards and processes. Lumos is committed to delivering trauma-informed and survivor-centred responses, prioritising the safety, dignity, views, wishes and feelings of impacted person(s) and ensuring staff have been trained on these approaches to avoid re-traumatisation.

**Monitoring:** PSEA is monitored through MEAL processes for all programmatic activities. Safeguarding outcomes, activities and indicators, including for PSEA, are regularly tracked. Reports of concerns are centrally managed and recorded to monitor for any trends. Lumos is committed to continuing learning and improvement, ensuring that lessons learned relating to safeguarding and PSEA incidents are noted and adjustments applied across the organisation. Safeguarding, including PSEA, is a governance and operational priority, with systems and processes regularly monitored by the Executive Leadership Team and Board of Trustees.

#### 5. Reporting SEA Concerns

**Lumos staff and associates have a duty to report all SEA concerns they witness, suspect or are told about. This includes:**

- Concern that a child, adult at risk, programme participant or community member is experiencing or at risk of experiencing sexual exploitation and abuse or any other form of harm or abuse by Lumos staff/associates or due to Lumos activities.
- Concerns about the behaviour of staff/associates in delivery partners or in other agencies or NGOs Lumos comes in to contact with

**Reports should be raised within 24 hours or as soon as possible to any of the below:**

- Designated Safeguarding Lead
- Line Manager
- Global Safeguarding Lead (GSL - [safeguarding@wearelumos.org](mailto:safeguarding@wearelumos.org))
- CEO
- Safeguarding Trustee
- [SafeCall](#) (SafeCall is a confidential services that is available in over 170 languages, 24 hours a day where concerns relating to Lumos staff or programmes, including safeguarding concerns, can be anonymously reported. You can make a report online or over the phone (calls are free). Staff and associates are encouraged to use the protected and confidential mechanisms outlined in the Whistleblowing Policy if they feel unable to report a concern via the normal reporting protocols.

**Community Protection Concerns:** Staff/associates, in the course of their work, may be made aware of community protection concerns (cases of harm or abuse NOT related to or carried out by Lumos staff, associates or partners). Community protection concerns should be raised to the country office DSL or the GSL if no country office DSL is available. These shall be reported via the same reporting pathways and addressed and documented as a programme issue, in line with the Lumos Child Protection Protocols (under development). The DSL and GSL can support if required e.g in ensuring a survivor-centred approach and the GSL will maintain an overview to ensure appropriate duty of care in line with this policy.

For further detail on reporting, see Lumos Global Safeguarding Policy.

## **6. Responding to SEA Concerns**

The relevant Designated Safeguarding Lead (DSL) and Senior Manager or Country Director are responsible for managing all SEA concerns, with support from the Global Safeguarding Lead (GSL). Responding to concerns will always be prioritised, and a trauma-informed, survivor-centred approach will guide all actions. For detailed operational guidance, staff should refer to the *Safeguarding Incident Management Guidelines*.

### **Triage and Escalation**

When a concern is raised, the DSL will review the information, provide initial advice, and escalate to the Senior Manager/Country Director and the GSL within 24 hours.

### **Case Management**

The DSL and Senior Manager/Country Director manage the concern, documenting all actions and drawing on advice from the GSL as needed. The GSL maintains the central safeguarding case log, monitors cases for

quality and consistency, and escalates high-risk or complex cases immediately to the Chief Executive and/or the Nominated Trustee for Safeguarding. Case management may include:

- Gathering further information and conducting a safeguarding risk assessment.
- Putting in place immediate measures to protect the person's in question.
- HR/People will lead the employment process in line with the *Policy on Managing Safeguarding Allegations Against Staff and Associates*, ensuring compliance with local labour law. In high risk cases, staff may be suspended without prejudice until an investigation is concluded.
- Referring concerns to local statutory authorities or protection services. Lumos will comply with national laws requiring referral to statutory authorities unless such referral would place the child or adult at greater risk of harm. In such cases, a risk assessment will be conducted, and the final decision will rest with the Senior Manager/Country Director and the GSL, in consultation with the Chief Executive if required.
- Cases will be closed following consultation between the DSL, Senior Manager/Country Director, and the GSL, with input from the Chief Executive or Nominated Trustee for higher-risk or complex cases. A case should be closed only once the individual is no longer at risk of significant harm, and action has been taken to prevent recurrence.

### **Confidentiality and Documentation**

All safeguarding concerns must be documented using the Lumos Safeguarding Report Form within 24 hours by the staff member who became aware of the issue. The DSL adds comments and forwards the report to the GSL within the next 24 hours. All case documentation must be stored securely and shared through approved, confidential channels in line with Lumos' *Data Protection Policy*. Information will only be shared on a strict 'need to know' basis. The DSL and Senior Manager/Country Director ensure confidentiality in local management of the case, while the GSL oversees central documentation, maintains the safeguarding case log, and ensures any breaches of confidentiality are addressed. Central records allow Lumos to monitor trends, identify risks, and strengthen organisational learning.

### **Trauma-Informed and Survivor-Centred Approach**

Lumos will ensure that responses do not cause further harm or distress. Those affected will be kept informed, as appropriate to their age and understanding, and referred to external services for specialist support including medical, psychosocial, legal and other services for survivors will be completed as appropriate, working with local agencies and partners wherever possible.

### **Support for Staff**

Staff who respond to SEA concerns, particularly those receiving direct disclosures, will have access to debriefing and support. Referrals for professional counselling may be offered, alongside access to Lumos' Employee Assistance Programme. Staff regularly exposed to casework will be offered additional wellbeing support as appropriate.

## **7. Monitoring, Accountability and Learning**

The Director of People and Operations and Global Safeguarding Lead (GSL) has responsibility for monitoring the implementation of this policy and ensuring it remains suitable and consistently applied across Lumos. The GSL reports regularly to the PSSC and the Board of Trustees on SEA cases, implementation, and organisational learning. This policy will be formally reviewed every two years, or earlier if required. The Director of People and Operations and Global Safeguarding Lead are responsible for ensuring that PSEA measures are embedded across all Lumos operations, monitored regularly, and

continuously strengthened so that all children, adults at risk, programme participants, and communities we engage with are protected from harm.

## **8. Related Polices, Guidelines and Resources**

Code of Conduct

Global Safeguarding Policy

Whistleblowing Policy

Guidance on the Reporting and Escalation of Safeguarding Incidents and Cases

Additional Risk Factors and Signs and Indicators of Abuse

Safer Recruitment Procedures

Safeguarding Risk Assessment Template

Global Ethical Content and Storytelling Policy

Safeguarding Due Diligence Framework and Guidance

Case Recording Guidance and Case Record Template

Implementing Safeguarding Toolkit for Lumos and Partners

Safeguarding Incident Management Guidelines

Managing Safeguarding Allegations Against Staff and Associates Policy

Lumos Child Protection Protocol (upcoming)

Child Friendly Safeguarding Policy