

Finland's policy on the prevention and elimination of sexual exploitation, abuse and sexual harassment in development cooperation and humanitarian assistance

This policy states what the Ministry for Foreign Affairs of Finland expects from the partners, who receive financing from the Ministry and who work in development cooperation and humanitarian assistance, with regard to the prevention of and response to sexual exploitation, abuse and harassment (SEAH). The policy is a public document that has been adopted by the Ministry's Development Policy Steering Group on 1 March 2023.

The Ministry expects its partners

- Understanding the policies, principles and standards of the prevention of sexual exploitation, abuse and harassment (PSEAH);
- Having in place SEAH prevention mechanisms;
- Having in place a risk management process that includes SEAH;
- Having in place a SEAH reporting and follow-up mechanism/procedure;
- Making reasonable efforts so that complaint mechanisms are known by the population being assisted. All complaints are expected to be handled by staff other than those who manage programmes and are in contact with communities; and
- [Reporting](#) any allegations of SEAH to the Ministry for Foreign Affairs of Finland.

1 Introduction

The Ministry for Foreign Affairs of Finland has a zero tolerance policy on sexual exploitation, abuse and harassment (SEAH). The Ministry has also a zero tolerance policy on inaction to SEAH. Other key principles are a victim-survivor centred approach and a recognition of the impact of power imbalances as a root cause of SEAH. There is diversity both in those who experience SEAH and in those who perpetrate them: they can be beneficiaries, implementing partners or staff of the Ministry. SEAH may be punishable by the Finnish Criminal Code. The Ministry for Foreign Affairs of Finland, in addition to the person who has experienced SEAH, may report the offence to the police for further investigation. In case SEAH has occurred in a project financed by the Ministry for Foreign Affairs of Finland, the Ministry may also,





depending on the nature and circumstances of the incidents, make a decision to recover government grants in accordance with the Act on Discretionary Government Grants (688/2001).

The purpose of the policy is to ensure effective action to prevent and respond to SEAH in development cooperation and humanitarian assistance. The policy outlines the expectations and requirements for the partners of the Ministry for Foreign Affairs of Finland on managing the risk of SEAH and addressing SEAH incidents, should they occur in the implementation of development cooperation and humanitarian assistance.

The policy is based on the OECD's Development Assistance Committee's (DAC) [Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance](#).

The prevention and elimination of and response to SEAH is a priority for the Ministry. Preventing sexual exploitation, abuse and harassment is everybody's responsibility. The Ministry for Foreign Affairs of Finland has a duty as an employer to address workplace SEAH in accordance with the Act on Occupational Safety and Health (738/2002), the Act on Equality between Women and Men (609/1986) and the Act on Non-discrimination (1325/2014). It is the policy of the Ministry to include this obligation in all its agreements and government grant conditions.

The prevention and elimination of sexual exploitation, abuse and harassment is a part of the risk management of the Ministry for Foreign Affairs of Finland and is subordinate to the Norm for Misuse of Funds (Norm 5/2023, VN/8285/2023). SEAH risks should be identified and assessed at the planning stage of any development cooperation or humanitarian intervention, including measures to prevent SEAH. Any significant residual SEAH risks should be highlighted and mitigation measures developed.

The Ministry for Foreign Affairs of Finland participates in and follows up different international initiatives and efforts to prevent and eliminate SEAH, including the working groups related to Finland's international commitments on SEAH.

Any gender can experience sexual exploitation, abuse and harassment. Perpetrators of SEAH can be of any gender. Sexual exploitation, abuse and harassment constitute sexual and gender-based violence. SEAH can also occur online. Different forms of SEAH are interrelated, have the same root causes and, therefore, they should be addressed holistically.



2 Key Terms

Sexual exploitation, abuse¹ and harassment² may be defined as follows:

Sexual exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from sexual exploitation of another. Examples of sexual exploitation include requiring sexual favours as a condition for giving assistance to a person.

Sexual abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Examples of sexual abuse include attempted rape, forcing someone to perform oral sex/touching, and rape.

Sexual harassment: Verbal, non-verbal or physical conduct of a sexual nature that is unwanted and by which a person's psychological or physical integrity is violated intentionally or factually, in particular by creating an intimidating, hostile, degrading, humiliating or offensive atmosphere. Examples of sexual harassment include gestures and other non-verbal communication with sexual undertones, comments of sexual nature about individuals and/or their body, conduct, sex life or gender identity, pornographic material, and sexually suggestive letters, e-mails, text messages or phone calls.

It is important to note that **in the UN context, sexual exploitation and abuse** is something that takes place **between the actors of the organisation and external actors** (partners, beneficiaries), while sexual harassment takes place **inside a workplace/an organisation**.

¹ The definitions of sexual exploitation and abuse are based on UN Secretary-General's bulletin "[Special measures for protection from sexual exploitation and sexual abuse](#)", 9th October, 2003.

² The definition of sexual harassment is based on [the definition by Ombudsman for Equality of Finland](#).



3 Finland's international commitments

Finland has made the following international commitments to prevent, respond to and eliminate sexual exploitation, abuse and harassment in development cooperation and humanitarian assistance:

- [London commitments](#)
- [DAC Recommendation on Ending Sexual Exploitation, Abuse, and Sexual Harassment in Development Co-operation and Humanitarian Assistance](#)
- [Call for Action to End Gender Based Violence in Emergencies](#)

These commitments are political in nature. Finland reports on their implementation.

4 Key principles

The Ministry for Foreign Affairs of Finland has a **zero tolerance** policy on sexual exploitation, abuse and harassment (SEAH). This means that the Ministry does not accept any form of sexual exploitation, abuse and harassment from its employees or partners, nor tolerate ignoring, covering up or mishandling cases by anyone receiving funding from the Ministry or acting on its behalf. Zero tolerance is not the same as zero incidents.

The diversity of local contexts must be taken into account when developing solutions to prevent, respond to and eliminate SEAH in order to ensure their effectiveness while keeping in mind that SEAH is not acceptable in any form in any context.

Finland is committed to **the victim/survivor-centred approach**. Key elements of this approach are:

- Placing the rights, needs, safety and dignity of those who have experienced SEAH at the centre of actions to prevent, respond to and eliminate SEAH, from the programme design to investigating and responding to potential incidents.
- Designing accessible mechanisms for making complaints with the needs and contexts of victims and survivors in mind.
- Listening to victims and survivors (or their representatives).



- Ensuring privacy and confidentiality in line with prevailing legislation.
- Ensuring that victims and survivors are provided with the necessary protection, including from further harm, and support and addressing their safety, health and/or psychological needs, including rehabilitation and providing victims and survivors with comprehensive information.
- Supporting victims and survivors in being involved in the decision-making concerning them to the extent they wish to be involved and holding the perpetrators accountable.

Recognising the impact of unequal power dynamics and inequalities: Preventing and eliminating sexual exploitation, abuse and harassment (SEAH) require addressing the power imbalances linked to gender inequalities, harmful social norms and gender stereotypes that are root causes of SEAH. While social norms take years, if not decades, to transform, the harmful behaviours they underlie should not go unaddressed. These must be addressed to ensure a gender-equal and inclusive organisational culture. The role of leadership is crucial in taking action on SEAH but also in leading the way in bringing about more profound changes.

Monitoring, reporting and evaluating SEAH prevention and response is crucial. Finland follows up closely this topic in its cooperation with partners, for example in the governing boards of UN agencies and development banks. The topic is also included in the annual reporting of Finnish CSOs that receive programme support.

5 What we expect from our partners

- To understand the policies, principles and standards of the prevention of SEAH (PSEAH), including by having in place a risk management process, for example.
- To have in place SEAH prevention mechanisms. These could include codes of conduct or PSEAH guidelines and awareness raising and PSEAH training for staff, beneficiaries and stakeholders.
- To have in place a risk management process that includes a risk analysis on SEAH in the development cooperation or humanitarian action funded by the Ministry, assessing the probability and impact of identified risks, measures to prevent and mitigate risks as well as roles



and responsibilities to address them. Partners are expected to regularly monitor and report on risk management concerning PSEAH.

- To have in place a SEAH reporting and follow-up mechanism/procedure, including a whistle blowing channel that includes SEAH. Any allegations and complaints and any reported/suspected cases must be handled effectively and resolved ensuring confidentiality and protecting victims/survivors from harm.
- To make reasonable efforts so that complaints mechanisms are known by the population being assisted. Additionally, in as much as possible, the Ministry expects complaints to be handled by staff other than those who manage programmes and are in contact with communities.
- To [report](#) to the Ministry for Foreign Affairs of Finland any allegations of SEAH that arise in the delivery of Finland's international assistance.
- The rights, needs and safety of those who have experienced SEAH must be at the centre of actions to prevent, respond to and eliminate SEAH.

It is the policy of the Ministry to include the prevention of and response to SEAH in its financing agreements as well as in the discretionary government grants awarded by the Ministry and the conditions for their use. All relevant agreements and decisions must include provisions on the prevention of and response to SEAH and on the associated reporting requirements. This policy also applies to cooperative arrangements with partner entities.

Partners are expected to provide information on their actions to prevent and to respond to SEAH when applying for funding. This is considered a key criterion in assessing any funding application. The Ministry follows up its partners' actions to prevent and to respond to SEAH, including through their annual reporting and executive boards.

5.1 Examples of factors that can affect the risk of experiencing SEAH

It is important to note that certain factors can increase the risk of SEAH, such as

- Gender
- Sexual orientation and gender identity



- Disability
- Ethnicity, indigenous status
- Religion
- Poverty
- Age
- Health
- Humanitarian fragile and conflict-affected environments
- Contexts with high level of gender-based violence and discrimination
- Context with presence of persons in vulnerable situations
- Male-dominated environments and organisations
- Programmes with activities taking place in remote areas or where activities involve access to sensitive personal information

6 Notification of a case

The Ministry's website on misuse of development cooperation funds: Any allegation of sexual exploitation, abuse and harassment must be notified immediately to the Ministry for Foreign Affairs of Finland through the [website for reporting suspicions of misuse of development cooperation funds](#). All notifications received will be handled confidentially. Providing unnecessary personal and confidential information or information that may cause harm to the victim/survivor should be avoided. The Ministry handles the documents according to the Act on the Openness of Government Activities (621/1999), the General Data Protection Regulation (EU 2016/679), the Data Protection Act (1050/2018) and other obligatory internal norms and instructions, for example the Norm for Misuse of Funds (Norm 5/2023, VN/8285/2023).