



ST. MARY'S GLOBAL FOUNDATION FOR EDUCATION AND HEALTH

Policy on Protection from Sexual Exploitation and Abuse (PSEA) and Safeguarding of Beneficiaries

PSEA & SAFEGUARDING POLICY

DOCUMENT NO.

SMGF-PSEA-001

VERSION

1.0

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March 2026

NEXT REVIEW

March 2027

STATUS

Active

ORGANIZATIONAL COMMITMENT

St. Mary's Global Foundation for Education and Health maintains a zero-tolerance policy toward sexual exploitation, sexual abuse, and all forms of harassment and misconduct by any personnel toward beneficiaries.

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1 Purpose & Scope

1.1 Purpose

This Policy on Protection from Sexual Exploitation and Abuse (PSEA) and Safeguarding of Beneficiaries establishes St. Mary's Global Foundation for Education and Health's (hereinafter "SMGF" or "the Foundation") commitment to protecting all persons served by its programs from sexual exploitation, sexual abuse, and any other form of misconduct perpetrated by its personnel.

The policy provides a clear framework for prevention, reporting, response, and accountability, ensuring that the dignity, rights, and well-being of all beneficiaries — most especially children and other vulnerable populations — are upheld at all times and in all circumstances.

1.2 Scope of Application

This policy applies to all persons acting on behalf of SMGF, including without limitation:

- Board of Directors members and trustees
- The Executive Director and all senior management
- Full-time, part-time, and temporary employees
- Volunteers, interns, and student placements
- Consultants, contractors, and service providers
- Implementing partners, sub-grantees, and consortium members

Any other individual authorized to act on SMGF's behalf

The policy covers all SMGF activities and operations, including field programs, office environments, online and remote work, travel, training, and any third-party-delivered programs supported by SMGF funding.

1.3 Beneficiary Focus

While this policy establishes conduct standards for all SMGF personnel, its primary purpose is the protection of beneficiaries — particularly children, women, internally displaced persons, persons with disabilities, and other individuals in vulnerable circumstances who interact with SMGF programs in South Sudan and wherever the Foundation operates.

2 Definitions

For the purposes of this policy, the following definitions apply:

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. (Source: UN SG Bulletin ST/SGB/2003/13)

Sexual Abuse

Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. (Source: UN SG Bulletin ST/SGB/2003/13)

Beneficiary

Any individual who receives, or is intended to receive, goods, services, or assistance from SMGF programs, directly or through a partner organization.

Child

Any person under the age of 18 years, consistent with the UN Convention on the Rights of the Child (CRC) and the South Sudan Child Act 2008.

Vulnerable Adult

An adult who, by reason of age, disability, illness, displacement, extreme poverty, gender, ethnicity, or other circumstances, is at heightened risk of harm or less able to protect themselves from abuse, exploitation, or neglect.

Position of Power

A position in which a person has authority, control over resources, or influence over a beneficiary's access to assistance, services, or opportunities — creating an inherent power imbalance that precludes genuinely free and equal consent.

Consent

Freely given, reversible, informed, enthusiastic, and specific agreement to engage in a specific activity. Consent cannot be given by a child (person under 18), by a person under coercion, intoxication, or duress, or by a beneficiary in relation to an SMGF staff member due to the inherent power differential.

Grooming

Actions deliberately undertaken by a person to befriend and establish trust with a child or vulnerable adult (and/or their family or carers) with the intent of preparing them for sexual exploitation or abuse.

Sexual Harassment

Unwelcome conduct of a sexual nature, including verbal, non-verbal, or physical conduct. A single incident may constitute sexual harassment if sufficiently serious. Does not require repetition.

Personnel

For purposes of this policy, all persons to whom this policy applies as described in Section 1.2 above.

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Legal & Normative Framework

This policy is grounded in and consistent with the following international, regional, and national legal and normative frameworks:

UN Secretary-General's Bulletin ST/SGB/2003/13 — Special Measures for Protection from Sexual Exploitation and Sexual Abuse (October 2003): Establishes the six core PSEA principles and mandatory conduct standards applicable to all UN and affiliated personnel.

UN Convention on the Rights of the Child (CRC), 1989 — Articles 19, 34, and 36: Obligates states and implementing organizations to protect children from all forms of physical and mental violence, sexual exploitation and sexual abuse, and all other forms of exploitation prejudicial to the child's welfare.

IASC Six Core Principles on PSEA — Inter-Agency Standing Committee framework establishing minimum standards for preventing and responding to sexual exploitation and abuse in humanitarian operations.

South Sudan Child Act, 2008 — National legislation governing the rights, protection, and welfare of children in South Sudan, including mandatory reporting obligations for child abuse and exploitation.

Optional Protocol to the CRC on the Sale of Children, Child Prostitution and Child Pornography (OPSC), 2000 — Obliges parties to prohibit and criminalize the sale, prostitution, and pornographic depiction of children.

Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), 1979 — Establishes women's rights to protection from gender-based violence and discrimination.

SPHERE Humanitarian Charter and Minimum Standards — Establishes the right to protection from sexual violence and exploitation in humanitarian response.

GPE-TESS Program Standards and Donor Requirements — Global Partnership for Education and TESS program requirements for implementing partners on safeguarding and PSEA.

4 Core Principles

SMGF's PSEA and safeguarding commitments are guided by the following core principles, adapted from the IASC Six Core Principles on PSEA:

Zero Tolerance

Sexual exploitation and abuse by SMGF personnel constitute gross misconduct and are grounds for immediate disciplinary action, including termination and referral to law enforcement. There are no exceptions and no circumstances that justify such conduct.

Duty of Care

SMGF has a legal and moral duty of care toward all beneficiaries with whom its personnel interact. This duty requires active measures to prevent harm, not merely the absence of direct harmful acts.

Best Interests of the Child

In all decisions and actions affecting children, the best interests of the child shall be a primary consideration, consistent with Article 3 of the UN Convention on the Rights of the Child.

Do No Harm

SMGF programming must be designed and implemented in ways that minimize risks of harm to beneficiaries, including risks of exploitation and abuse arising from aid delivery mechanisms, power differentials, or program design.

Survivor-Centered Approach

Responses to alleged or confirmed PSEA incidents prioritize the safety, confidentiality, dignity, and agency of the survivor. The survivor's wishes guide decisions about next steps,

Accountability

SMGF is accountable to beneficiaries for the conduct of all personnel acting on its behalf. Complaints by beneficiaries will be treated seriously,

subject to mandatory reporting obligations for child victims.

investigated impartially, and resolved with appropriate action.

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Prohibited Conduct

The following conduct by SMGF personnel toward beneficiaries is strictly prohibited and will result in disciplinary action up to and including termination, and referral to law enforcement authorities:

- X Sexual exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including profiting monetarily, socially, or politically from sexual exploitation.
- X Sexual abuse:** Any actual or threatened physical intrusion of a sexual nature, whether by force, coercion, or manipulation, regardless of whether the act is completed.
- X Transactional sex:** The exchange, offer, or solicitation of money, employment, goods, services, assistance, or any other form of benefit in exchange for sexual acts or favors from a beneficiary.
- X Sexual relationships with beneficiaries:** Engaging in any sexual or romantic relationship with a current beneficiary. The inherent power differential between personnel and beneficiaries means that genuine consent cannot exist in such relationships.
- X Child sexual abuse and exploitation:** Any sexual act, threat of a sexual act, or sexually exploitative conduct toward a person under 18 years of age, including grooming, exposure to sexual material, soliciting sexual images, and all forms of child sexual abuse material (CSAM).

X Conditioning assistance on sexual favors: Making the provision of, or access to, humanitarian or development assistance, services, employment, or opportunities contingent on sexual compliance.

X Sexual harassment: Any unwanted verbal, non-verbal, or physical conduct of a sexual nature directed at a beneficiary, including unwanted touching, sexual remarks, gestures, or displaying sexually explicit material.

X Exploitation of vulnerability: Using a beneficiary's vulnerability, displacement, poverty, illness, age, gender, disability, or any other factor to obtain sexual acts, favors, or access.

X Physical child abuse: Any deliberate infliction of physical pain or injury on a child, or use of corporal punishment in any SMGF-supported program.

X Emotional and psychological abuse: Any deliberate act that causes emotional or psychological harm to a beneficiary, including humiliation, threats, intimidation, manipulation, isolation, or systematic denigration.

X Neglect: Deliberate failure by personnel with a duty of care to provide the basic necessities for a beneficiary's welfare when it is within their power and responsibility to do so.

X Sharing images or information: The photographing, filming, or sharing of images of beneficiaries — particularly children — without explicit informed consent, or in any manner that could be exploitative or harmful to the individual's dignity or safety.

All SMGF personnel are required to maintain professional conduct toward beneficiaries at all times. The following standards apply:

- ✓ Treat all beneficiaries with dignity, respect, and courtesy, irrespective of age, gender, ethnicity, religion, disability, or social status.
- ✓ Maintain clear professional boundaries with beneficiaries at all times and in all settings, including when off duty or in informal contexts.
- ✓ Never be alone with a child beneficiary without another adult present, except in genuine emergency situations requiring immediate safeguarding action.
- ✓ Use the least intrusive means necessary when providing assistance, respecting physical boundaries, privacy, and dignity at all times.
- ✓ Obtain informed consent before photographing or filming beneficiaries, and never photograph children in a manner that could be harmful, embarrassing, or exploitative.
- ✓ Report any concerns, suspicions, or allegations of PSEA immediately to the PSEA Focal Point or, if the Focal Point is implicated, directly to the Executive Director or Board Chair.
- ✓ Never discourage a beneficiary or fellow staff member from making a PSEA complaint or report.
- ✓ Cooperate fully and honestly with any PSEA investigation, maintaining confidentiality of all involved parties.
- ✓ Take reasonable steps to prevent PSEA when aware of a risk or when in a position to intervene safely.
- ✓ Complete all mandatory PSEA training as required by SMGF.

- ✓ Immediately disclose to the PSEA Focal Point any prior criminal conviction, allegation, or sanction related to sexual exploitation, abuse, or misconduct, whether self-related or involving others known to the personnel member.

7 Special Protections for Children

Given that many SMGF beneficiaries are children, and consistent with the UN Convention on the Rights of the Child and the South Sudan Child Act 2008, SMGF applies enhanced safeguarding standards for all interactions involving children:

7.1 Child-Safe Programming

All SMGF programs serving children will be designed and implemented with child safety as a primary design parameter.

Program risk assessments must include a specific child safeguarding risk assessment identifying circumstances that could expose children to harm.

All personnel working directly with children must complete specialized child safeguarding training before commencing work.

Children's participation in awareness activities, photo documentation, or any media must require informed consent from a parent or guardian and be age-appropriate.

7.2 Child-Safe Recruitment

All personnel with direct access to children must undergo criminal background checks and reference checks before appointment, including checks for prior PSEA allegations or convictions.

SMGF will contact all previous employers of candidates for child-facing roles and specifically inquire about PSEA history.

SMGF will screen against inter-agency misconduct databases where applicable.

PSEA compliance is a condition of all employment contracts, volunteer agreements, and partner agreements.

7.3 Supervision Protocols

No SMGF personnel shall be alone with a child beneficiary without another adult present.

All activities involving children shall take place in visible, accessible locations with appropriate supervision.

Physical contact with children shall be limited to what is appropriate, necessary for program delivery, and consistent with cultural norms — and must never be secretive or exclude other adults.

Home visits to children's homes must be conducted by at least two SMGF personnel.

7.4 Mandatory Reporting for Child Victims

Consistent with the South Sudan Child Act 2008, SMGF personnel who have reasonable grounds to believe that a child has been subjected to abuse, exploitation, or neglect have a mandatory obligation to report this to the PSEA Focal Point and, where required by law, to relevant authorities. The survivor's consent is not required for mandatory reports involving children.

8 Roles & Responsibilities

ROLE

KEY PSEA RESPONSIBILITIES

Board of Directors

Approve and champion the PSEA Policy; ensure adequate resources for PSEA implementation; receive annual compliance reports from the Executive Director; hold ultimate accountability for organizational PSEA culture.

Executive Director

Ensure implementation of PSEA policy across all operations; appoint and support the PSEA Focal Point; ensure PSEA training is conducted; report PSEA incidents to the Board;

ROLE	KEY PSEA RESPONSIBILITIES
	cooperate with external investigations; ensure PSEA compliance in partner agreements.
PSEA Focal Point	Serve as first point of contact for complaints and concerns; maintain confidential reporting logs; conduct or coordinate investigations; liaise with survivor support services; prepare compliance reports; oversee community awareness activities; maintain PSEA training records.
Senior Management	Model professional conduct; integrate PSEA into program design and risk assessments; ensure staff in their area complete PSEA training; respond appropriately to PSEA concerns raised by staff.
All Staff & Volunteers	Read, understand, and comply with this policy; complete mandatory PSEA training; report concerns or allegations to the PSEA Focal Point; maintain confidentiality; cooperate with investigations; never commit or facilitate PSEA.
Implementing Partners	Adopt and implement PSEA policies compliant with SMGF standards; include PSEA clauses in sub-agreements; train their own personnel; report PSEA incidents involving SMGF-supported activities to SMGF promptly.

9 Prevention Measures

9.1 Recruitment & Vetting

All candidates will be required to declare prior PSEA-related allegations, disciplinary actions, or convictions.

SMGF will conduct reference checks that explicitly ask previous employers about PSEA concerns.

Employment contracts, volunteer agreements, and consultancy contracts will include PSEA compliance clauses with termination provisions for violations.

SMGF will screen candidates against available misconduct disclosure databases.

9.2 Mandatory PSEA Training

All personnel will receive PSEA induction training before commencing work or field activities.

Annual PSEA refresher training is mandatory for all personnel.

Personnel working directly with children or other vulnerable groups will receive additional specialized training.

Training completion is documented and tracked by the PSEA Focal Point.

9.3 Community Awareness

SMGF will inform beneficiary communities about the PSEA policy, their rights, the types of conduct that are prohibited, and how to report concerns.

Information will be provided in locally appropriate languages and formats, including for beneficiaries with low literacy levels.

Community orientation sessions will be conducted at program commencement and updated regularly.

9.4 Safe Programming Design

All new programs will include a PSEA risk assessment during the design phase.

Aid delivery mechanisms will be assessed for PSEA risk and designed to minimize power differentials and prevent exploitation.

PSEA considerations will be integrated into monitoring and evaluation frameworks.

9.5 Code of Conduct Commitment

All personnel will sign SMGF's Code of Conduct, which incorporates PSEA standards, prior to commencing any SMGF duties. Signing the Code of Conduct constitutes acknowledgment and acceptance of PSEA obligations.

10.1 Who Can Report

Any person — including beneficiaries, community members, SMGF staff, volunteers, partners, or members of the public — may report a PSEA concern. SMGF will accept reports from any source and in any form, including anonymous reports.

10.2 How to Report

PSEA Reporting Channels — St. Mary's Global Foundation

<p>PRIMARY EMAIL</p> <p>info@stmaryseduhealth.org</p> <p>PSEA Focal Point — monitored regularly</p>	<p>SECONDARY / ADMIN</p> <p>admin@stmaryseduhealth.org</p> <p>For escalations or if primary channel is unavailable</p>
<p>ANONYMOUS REPORTS</p> <p>Accepted via any channel</p> <p>No name or contact required; will be taken seriously</p>	<p>COMMUNITY-BASED</p> <p>Community Liaison / suggestion box</p> <p>Available at all program sites</p>

10.3 Principles for Reporting

Confidentiality: The identity of the reporter and the survivor will be kept strictly confidential and will not be disclosed without consent, except as required by law or to protect safety.

Anonymous reports: Anonymous reports are accepted and will be investigated to the extent possible without identifying information.

Good faith reports: SMGF encourages reporting and will not penalize any person who makes a complaint in good faith, even if the complaint is not substantiated after investigation.

Accessible channels: SMGF ensures reporting channels are physically accessible, culturally appropriate, and available to persons with disabilities and low literacy levels.

10.4 Mandatory Reporting Obligation

All SMGF personnel are obligated to report any PSEA concern or allegation they become aware of, regardless of the source of information. Failure to report is itself a disciplinary matter. Personnel are not required to investigate before reporting — reporting a concern or suspicion is sufficient and expected.

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Response & Investigation Procedures

11.1 Immediate Response (within 24 hours)

The PSEA Focal Point will acknowledge receipt of the complaint and ensure the safety of the survivor is assessed immediately.

If the alleged perpetrator has ongoing access to the survivor or other beneficiaries, immediate protective measures will be taken, including temporary suspension of the alleged perpetrator pending investigation.

The survivor will be referred to appropriate support services (medical, psychosocial, legal) without delay.

The PSEA Focal Point will inform the Executive Director of all PSEA reports within 24 hours of receipt.

11.2 Investigation Process

Investigations will be conducted by a qualified, impartial investigator — where possible, a person not directly known to either party.

The investigation will be conducted with full confidentiality, respecting the dignity of all parties.

The accused will be informed of the allegation and given an opportunity to respond; they are presumed innocent until findings are made.

Investigators will interview the survivor only once where possible, using trauma-informed interview techniques.

Where child victims are involved, investigations will follow child-sensitive procedures and may involve specialized child protection authorities.

Investigations will be completed within 30 working days where possible, with updates provided to the survivor at regular intervals.

11.3 Reporting to Authorities and Donors

SMGF will report PSEA incidents involving children to relevant national authorities as required by the South Sudan Child Act 2008.

SMGF will report PSEA incidents to relevant donors, UN agencies, and inter-agency PSEA coordination mechanisms as required by grant agreements or inter-agency protocols.

SMGF will cooperate fully with any external investigation by authorities, UN agencies, or donor oversight bodies.

11.4 Confidentiality

All information related to PSEA investigations — including the identities of the survivor, reporter, witnesses, and accused — will be treated as strictly confidential. Information will only be shared on a strict need-to-know basis and with the survivor's knowledge. Breach of confidentiality by SMGF personnel is itself a disciplinary matter.

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Survivor Support

SMGF is committed to ensuring that survivors of PSEA receive timely, appropriate, and non-judgmental support. Access to support will never be conditional on the survivor agreeing to pursue a formal complaint or cooperate with an investigation.

Medical care: Referral to appropriate medical services, including emergency medical treatment, where required.

Psychosocial support: Access to counseling and psychosocial support services appropriate to the survivor's age, gender, and cultural context.

Legal assistance: Information about available legal remedies and referral to legal aid services upon request.

Safety planning: Support to identify and mitigate ongoing safety risks arising from the incident.

Continued program access: Survivors will not be penalized or excluded from SMGF programs as a result of a PSEA incident.

No obligation to report to police: Survivors who are adults will not be required or pressured to report incidents to police unless they choose to do so. For child victims, mandatory reporting to authorities applies as required by law.

SMGF will maintain updated referral pathways to survivor support services in all program areas, including local health facilities, social services, legal aid organizations, and specialized gender-based violence (GBV) response services.

13

Disciplinary Actions

13.1 Consequences for Perpetrators

Where a PSEA allegation is substantiated following investigation, SMGF will take firm and proportionate disciplinary action, up to and including:

Immediate suspension from all duties pending investigation, upon receipt of a credible PSEA allegation

Termination of employment or engagement for substantiated acts of sexual exploitation, sexual abuse, or sexual harassment of beneficiaries

Referral to law enforcement for acts that constitute criminal offenses under applicable national law, including all acts involving child victims

Reporting to inter-agency mechanisms and misconduct databases to prevent future employment in humanitarian or development roles

Notification to relevant donors, UN agencies, and coordination bodies in accordance with grant agreements and inter-agency PSEA commitments

13.2 Failure to Report

SMGF personnel who become aware of a PSEA allegation and fail to report it in accordance with this policy are themselves subject to disciplinary action, up to and including termination.

13.3 Due Process

All disciplinary proceedings will be conducted in accordance with due process, including the right of the accused to be informed of the allegations and to respond. Disciplinary action will be commensurate with the severity of the findings.

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Non-Retaliation

SMGF strictly prohibits retaliation against any person who in good faith:

- Reports a PSEA concern, allegation, or suspicion
- Participates in a PSEA investigation as a witness or in any other capacity
- Opposes any conduct prohibited under this policy
- Makes a formal or informal PSEA complaint

Retaliation includes any adverse action — including threats, demotion, dismissal, exclusion from activities, interference with program benefits, or social ostracism — taken against a reporter, survivor, or witness because of their PSEA-related action.

Any personnel found to have engaged in retaliation will be subject to disciplinary action. Any beneficiary who experiences retaliation will receive support and protection, including continued access to SMGF programs.

Persons who believe they have experienced retaliation should report this to the PSEA Focal Point, the Executive Director, or the Board Chair. If the alleged retaliation involves the PSEA Focal Point, the report should go directly to the Board Chair.

15

Third-Party Obligations

SMGF's PSEA standards extend to all organizations and individuals acting on SMGF's behalf or implementing SMGF-funded activities.

15.1 Implementing Partners

All implementing partner agreements and sub-grant agreements must include PSEA compliance clauses consistent with this policy.

Partners must certify that their own PSEA policy meets SMGF minimum standards before engagement.

Partners must train their own personnel on PSEA requirements.

Partners must report PSEA incidents involving SMGF-supported activities to SMGF promptly.

SMGF may conduct PSEA compliance audits of implementing partners.

Persistent or serious PSEA non-compliance by a partner may result in suspension or termination of the partnership agreement.

15.2 Contractors and Service Providers

All contracts with service providers and consultants who have contact with SMGF beneficiaries must include PSEA compliance clauses. Contractors are required to comply with this policy in all activities under their engagement with SMGF.

15.3 Vendors

Vendors supplying goods or services for SMGF programs shall be informed of PSEA standards and required to comply with minimum conduct standards when on SMGF premises or program sites.

16

Training & Awareness

16.1 Mandatory Staff Training

Induction training: All new personnel complete PSEA training as part of their induction program before commencing field activities or having contact with beneficiaries.

Annual refresher: All personnel complete an annual PSEA refresher to reinforce standards, address emerging issues, and confirm ongoing commitment.

Specialized training: Personnel working directly with children complete additional child safeguarding training. Management-level staff complete training on investigation procedures, survivor support, and trauma-informed approaches.

16.2 Training Content

PSEA training will cover:

Definition of PSEA and prohibited conduct under this policy

How to recognize warning signs of PSEA

Reporting procedures and channels

Mandatory reporting obligations, including for child victims

Survivor-centered response principles

Confidentiality obligations

Non-retaliation protections

Consequences of PSEA violations

16.3 Community Sensitization

SMGF will conduct regular community awareness sessions in all program areas, informing beneficiaries and community members of their right to protection from PSEA, what conduct is prohibited, and how to report concerns.

Community sensitization materials will be developed in accessible formats and local languages.

SMGF will engage community leaders, women's groups, and parent associations in PSEA awareness efforts.

16.4 Record-Keeping

The PSEA Focal Point will maintain records of all PSEA training completed, including participant names, training dates, content covered, and attendance confirmation. Training records will be reviewed as part of the annual PSEA compliance review.

17.1 Annual Policy Review

This policy will be reviewed annually by the PSEA Focal Point and the Executive Director, or following any significant PSEA incident. The review will assess:

- Implementation progress and gaps identified
- PSEA incidents reported, investigated, and resolved
- Training completion rates
- Community awareness reach
- Changes in applicable law, donor requirements, or inter-agency standards

Review findings and proposed amendments will be presented to the Board of Directors for approval.

17.2 Compliance Audits

SMGF may conduct periodic compliance audits — including of implementing partners — to assess adherence to PSEA requirements. Audit findings will be documented and remediation plans developed for identified gaps.

17.3 PSEA in Program Monitoring

PSEA safeguarding indicators will be integrated into program monitoring and evaluation frameworks. Regular program monitoring will include community feedback mechanisms that enable beneficiaries to report PSEA concerns safely and confidentially.

17.4 Version History

Version	Date	Author	Description
1.0	March 2026	SMGF Governance	Initial policy approved for UN Partner Portal submission — GPE-TESS concept note compliance.

Approval & Signatures

This Policy on Protection from Sexual Exploitation and Abuse (PSEA) and Safeguarding of Beneficiaries has been reviewed and approved by the authorized representatives of St. Mary's Global Foundation for Education and Health.

Executive Director

St. Mary's Global Foundation for Education and Health

Date: _____

Board Chairperson

St. Mary's Global Foundation for Education and Health

Date: _____

PSEA Focal Point

St. Mary's Global Foundation for Education and Health

Date: _____

Head of Programs

St. Mary's Global Foundation for Education and Health

Date: _____

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Policy Owner: Executive Director, St. Mary's Global Foundation for Education and Health