



SWISS TPH SAFEGUARDING POLICY:

Sexual Exploitation, Abuse & Harassment
(SEAH)
Child Protection
Anti-Human Trafficking

Approved by Swiss TPH Directorate in their management meeting on 28 February 2025

Version 1.0

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1. INTRODUCTION

In pursuing our **mission** of improving the health and well-being of people – locally, nationally and internationally – through excellence in research, education and services, Swiss TPH respects the human rights of all individuals, including their dignity, safety, and freedom from exploitation and abuse.

There is **international recognition** that adults who have a formal role in working with or supporting children, vulnerable adults, women, girls, and gender-diverse people hold positions of trust and authority. There is also international recognition that sexual misconduct and human trafficking pose a major risk to human rights, a healthy working environment, and to organizational trust and reputation.

Swiss TPH is committed to **safeguarding** the well-being of all people and partners of Swiss TPH, including employees, consultants, students, partners, and board members. Whether in Switzerland or abroad, this policy applies to all who are involved in our activities. We expect Swiss TPH employees, students, consultants, and board members to know and abide by this **Safeguarding Policy**. We are particularly vigilant of the well-being and security of children, vulnerable adults, women, girls, and gender-diverse people, particularly in fragile contexts where Swiss TPH operates, notably in low- and middle-income countries.

2. PURPOSE AND PRINCIPLES

This **Safeguarding Policy** reinforces our commitment to ensuring that our employees, students, consultants, and board members and our activities do no harm to children, vulnerable adults, women, girls, and gender-diverse people, or expose them to the risk of human trafficking and worker exploitation, or sexual harassment, abuse, or exploitation of any kind. It also aims to protect Swiss TPH people and partners, both in internal interactions within Swiss TPH and external engagements, from human trafficking and worker exploitation, and sexual harassment, exploitation, or abuse. Furthermore, it establishes the expectation that any such incident be reported immediately to Swiss TPH and the appropriate authorities (internal Swiss TPH response mechanisms described below – section 7).

Swiss TPH adheres to the principles of the UN Inter-agency Standing Committee (IASC) [Six Core Principles Relating to Sexual Exploitation and Abuse](#), the [United Nations' Convention on the Rights of the Child](#), the [European Convention on Human Rights](#); the Council of Europe's [Istanbul Convention](#); the [European Convention on the protection of Children from Sexual exploitation and sexual abuse](#); the [UN work on prevention of sexual exploitation, and abuse](#); and the work of the World Health Organization on [Preventing and Responding to Sexual Exploitation, Abuse and Harassment](#); as well as the [United Nations Convention against Transnational Organized Crime and its two related protocols: the United Nations Protocol to Prevent, Suppress, and Punish Trafficking in Persons, Especially Women and Children, and the United Nations Protocol against the Smuggling of Migrants by Land, Sea, and Air](#).

3. SCOPE

This **Safeguarding Policy** applies to all employees, students, consultants, and board members – hereafter referred to as “Swiss TPH people and partners”. Regardless of location, Swiss TPH will enforce this policy in all contexts where it has direct responsibility or leadership. In cases where Swiss TPH operates as a subcontractor, we remain committed to upholding the principles of this policy to the fullest extent possible within our role.

The **Safeguarding Policy** covers any form of sexual misconduct (see section 4 “Definitions”), whether that be between or among Swiss TPH people and partners, or such misconduct by any of the latter towards other people involved in our work, programme, research, study, and health service environment. It also specifically covers workplace sexual harassment as well as child protection matters in all of our work. Finally, it covers all forms of human trafficking and worker exploitation. It does not, however, cover the more specific issues related to adults or children in human subject research. Of note, all our human subject research undergo ethical approval based on [Swiss regulations](#) and the [Code of Conduct for scientific integrity](#) of the Swiss Academy of Medical Sciences (SAMS), as well as on the regulations of the respective countries where the research is being carried conducted.

As part of a broader ethical framework, other guidance documents include our [Tell-Us System Policy](#); [Code of Conduct](#); Student Handbook; [Diversity, Equity and Inclusion Policy](#); [Anti-Human Trafficking and Worker Exploitation: General guidance and action plan](#); and Employee Handbook. These regulatory documents prohibit various behaviours and ensure protection of personality, and this policy reinforces these policies through a dedicated focus on sexual misconduct.

4. DEFINITIONS

Swiss TPH People and Partners (see our Code of Conduct): Refers to employees, students, consultants, and board members.

Child: Any person under the age of 18 years, regardless of age of sexual consent under any national legislation. Also referred to in this document as ‘minor’ in quoted definitions. However, the preferred term is ‘child’ and relates to the definition as given here.

Assent: Expression of a child’s will to participate in a Swiss TPH activity, which can be considered valid if the child has received appropriate information about the risks and benefits of the activity, is capable of understanding the information and explicitly agrees to participate fully understanding the right to refuse or withdraw from the activity. Assent is necessarily tied to the informed consent of the parent(s)/legal guardian(s) of the child.

Consent: Written agreement of a child’s parent(s)/legal guardian(s) for a child to participate in a Swiss TPH research or service activity based on: appropriate information provided by Swiss TPH people or partners, or any other person acting on behalf of Swiss TPH, about the activity including potential risks and benefits, the right to refuse or withdraw, without any financial incentive to participate, and with all relevant contact information of those responsible for the activity and for reporting of any harm or abuse.

Human Trafficking: Also referred to as “worker exploitation” and “modern-day slavery”, describes situations where one person is exploited by another person for profit. The person or child may be forced to perform labour or engage in a commercial sex act (see below). This term covers many types of exploitation that use force, fraud, harassment, trickery, or abuse of power.

Sexual Exploitation: ‘Any actual or attempted abuse of 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. [...] “Sexual exploitation” is a broad term, which includes a number of acts [...], including “transactional sex”, “solicitation of transactional sex” and “exploitative relationship” ’¹ This also includes digital and cyber forms of sexual exploitation.

Sexual Abuse: ‘Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. [...] All sexual activity with a child is considered as sexual abuse. “Physical intrusion” is understood to mean “sexual activity”. “Sexual abuse” is a broad term, which includes a number of acts [...], including “rape”, “sexual assault”, “sex with a minor”, and “sexual activity with a minor”.² This also includes digital and cyber forms of sexual abuse.

Transactional Sex: ‘The exchange of money, employment, goods or services for sex, including sexual favours other forms of humiliating, degrading or exploitative behaviour.’³ This also includes digital and cyber forms of transactional sex.

Sexual Harassment: ‘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, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment’.⁴

Sexual harassment, as defined in Article 4 of the Swiss Federal Act on Gender Equality, refers to sexual harassment (in the workplace) as a form of discrimination, including any harassing behaviour of a sexual nature or other behaviour related to the person’s gender that adversely affects the dignity of people in the workplace.⁵

For Swiss TPH, this means any form of discrimination that is based on sex, gender, physical appearance, or sexual orientation and covers unwanted coercion, sexual advances, homophobic or transphobic remarks or behaviours, or sexist jokes or putdowns. It also includes threats, the promise of advantages, the use of coercion and the exertion of pressure in order to obtain favours of a sexual nature. This also entails any activities conducted digitally or via cyber means.

Sexual misconduct: All of the above definitions of sexual exploitation, abuse, and harassment and transactional sex fall under the **umbrella term of ‘sexual misconduct’ for the purposes of this policy.**

¹ [SEA Glossary \[Second Edition - 2017\] - English_0.pdf \(un.org\)](#)

² Ibid.

³ Ibid.

⁴ Ibid.

⁵ [Sexual harassment in the workplace - A guide for employees \(admin.ch\)](#)

5. SWISS TPH APPROACH TOWARDS PROHIBITED BEHAVIOUR

5.1 Sexual Misconduct

Swiss TPH ensures that all people are respected and protected from sexual misconduct, regardless of any protected characteristic including a person's racial identity, ethnic identity, nationality, residency status, cultural background, mother tongue, religious affiliation, gender identity, sex, sexual orientation, age, socio-economic status, disabilities, neurodiversity, or health status.

Examples of sexual misconduct (non-exhaustive):

- Insinuating, suggestive or disparaging remarks about someone's physical appearance or body;
- sexist comments or jokes about sexual characteristics, sexual behaviour, or sexuality of any person;
- jokes or disparaging comments about sexual orientation or gender identity;
- showing or displaying pornographic material in the workplace including via digital means;
- issuing unwanted invitations of a sexual nature;
- unwanted bodily contact of a sexual nature;
- stalking;
- offering promises of advantage or threat of disadvantage stipulated upon sexual favours;
- sexual assault, coercion, or rape;
- making sex a condition for assistance or work;
- blackmailing someone into having sex;
- forcing sex or forcing someone to have sex with anyone; and
- forcing a person to engage in prostitution or pornography.

5.2 Child Protection

We ensure that Swiss TPH people and partners treat children with respect and protect their rights, regardless of any protected characteristic including the child's racial identity, ethnic identity, nationality, residency status, cultural background, mother tongue, religious affiliation, gender identity, sex, sexual orientation, age, socio-economic status, disabilities, neurodiversity, or health status.

When interacting with children in our activities, we require Swiss TPH people and partners to:

- avoid being alone with an unaccompanied child involved in our activities;
- not employ (labour) a child for any of our activities;
- not subject a child to verbal, physical, emotional, psychological or sexual abuse, or neglect;
- not engage in any commercially exploitative activities with children including child labour or trafficking;
- not invite an unaccompanied child to their home or other place unrelated to Swiss TPH

activity, unless there is an emergency-related reason and is to protect the child from harm; and

- not take photos of a child involved in our activities without assent of the child and written consent of a parent or legal guardian, and ensure that no suggestive poses are taken and that the child's body is adequately covered. Photos of children may only be taken for purposes of our activities. General photos of groups may not require consent forms; when in doubt please consult the Swiss TPH communications unit for guidance including how to protect data when saving or sending images.

5.3 Human Trafficking

At Swiss TPH we ensure that our people and partners are cognizant of the realities of human trafficking and worker exploitation, engage only those eligible for work activities and doing so according to our regulations. Human trafficking generally involves three elements: (i) the perpetrator's actions to obtain or maintain labour; (ii) using force, fraud, or coercion over the victim; and (iii) the actions aim at taking advantage of the victim. The use of force, fraud, or coercion over a victim may include preventing a victim from controlling their own freedom, safety, personal documents, working and living conditions, and wages. If a worker does not have control over any of these areas, it is a potential sign of trafficking or exploitation. Human trafficking is strictly illegal under the Swiss Criminal Code (Art. 185, 195 and 196).

In addition to human trafficking as defined above, actions that directly support or promote trafficking are prohibited. Such actions include, but are not limited to:

- procuring a commercial sex act (see above);
- destroying, hiding, taking, or denying an employee access to their identity or immigration documents;
- offering employment under false pretences;
- charging employees recruitment fees;
- providing wages and benefits that do not meet local legally required minimum standards;
- providing housing that does not meet local housing and safety standards; and
- failing to provide transportation to an employee working outside of the country from which they were recruited upon the end of employment.

6. ZERO TOLERANCE

Swiss TPH has **zero tolerance** for any verbal, physical, or sexual abuse as well as exploitation or other harm of children.

Swiss TPH has **zero tolerance** for any form of sexual misconduct as cited above (see also our [Tell-Us System Policy](#); [Code of Conduct](#); [Diversity, Equity and Inclusion Policy](#); Student Handbook and Employee Handbook).

Swiss TPH has **zero tolerance** for any form of human trafficking or worker exploitation as cited above (see our [Anti-Human Trafficking and Worker Exploitation: General guidance and action plan](#)).

6.1 Prevention and Training

When recruiting staff, Swiss TPH conducts background checks and reference checks with explicit reference to sexual misconduct. All Swiss TPH people and partners are required to sign the Swiss TPH Code of Conduct and this Safeguarding Policy and follow related trainings.

Swiss TPH holds mandatory induction and refresher trainings on this Safeguarding Policy and procedures for all employees and related personnel. This includes at a minimum an annual online refresher of the policy itself, the relevant definitions, the zero tolerance as well as actions that employees and related personnel are required to take.

Swiss TPH systematically vets all prospective job candidates in accordance with established screening procedures.

All Swiss TPH people and partners are required contractually to have read and understood the terms of this policy.

Swiss TPH-initiated contracts and partnership agreements include a standard clause requiring contractors, suppliers, consultants, and sub-partners to have a zero tolerance policy on sexual exploitation, human trafficking, and child labour and to take measures to prevent and respond to incidents of such misconduct.

6.2 Reporting

Swiss TPH has safe, confidential, and accessible mechanisms and procedures for employees, students, consultants, beneficiaries, and communities, to report allegations in the frame of this policy.

All Swiss TPH people and partners are obliged to report experienced, witnessed, or suspected misconduct in the sense of this policy at Swiss TPH or in the context of Swiss TPH activities to one's supervisor or line manager, or via the Swiss TPH Tell-Us-System (which can also be anonymous) <https://swisstph.integrityline.org/>.

6.3 Investigation

Swiss TPH has a process for investigation of allegations in place and shall properly and without delay conduct an investigation of misconduct.

Internal investigations will be conducted according to the Swiss TPH [Regulations for the protection of personal integrity](#). If need be, an independent non-Swiss TPH lawyer conducts investigations in this frame.

6.4 Consequences

If, following a rigorous investigation, there is evidence of allegations under this policy, these cases will be referred to the relevant national authorities in the country of the incident for prosecution.

Swiss TPH will not work with any individual or organization where human trafficking or sexual misconduct is confirmed and reserves the right to end collaboration. **Any proven case of**

human trafficking or sexual misconduct under Swiss law will be followed by appropriate sanctions, including dismissal.

6.5 Protection of victims and reporters

Swiss TPH commits to promptly refer victims of sexual misconduct and human trafficking to (locally available) support services based on their needs and consent.

Swiss TPH provides protection to reporters to ensure that they are not be treated unfairly for having raised a concern in good faith. A report that is proven to be of malicious intent will be considered a serious offense and subject to sanction.

For more information on disciplinary measures, rules of conduct, and other related issues, the suite of Swiss TPH policies available can be consulted.