



Prevention of Sexual Exploitation, Abuse & Harassment Policy

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| Policy/ Manual Name | <i>PSEAH</i> |
| Signoff Authority | <i>Board</i> |
| Owner signoff & date | <i>Compliance Officer, May 2022</i> |
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| Training update required? | <i>Y</i> |

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Prevention of Sexual Exploitation, Abuse & Harassment Policy

1 INTRODUCTION

1.1 This document contains Good Return's Policy regarding Prevention of Sexual Exploitation, Abuse & Harassment (PSEAH). It responds to the 2019 ACFID Code of Conduct (Code) amendments and DFAT Guidelines which resulted from revelations of sexual misconduct in the overseas aid and development sector. While relevant standards that relate to protection of staff and people already exist within the Code, a principal finding from the review was that: *separate and specific Code Provisions and Quality Assurance Framework in respect of PSEAH that are relevant and strong are needed if we are to achieve the standards expected to prevent PSEAH.*

1.2 The standards expected of Good Return and its staff and associates are now separately and more explicitly addressed here. See Section 3 for the Definitions applicable to this Policy.

In addition, the Policy should be read in conjunction with the Staff Code of Conduct, developed during 2019 by a team drawn from our staff, approved by the Good Return Board, and containing personal commitments in relation to PSEAH and other matters.

In cases where staff are found to be in breach of any of the PSEAH requirements of either document, Good Return will regard that as a serious breach of conduct and of the employment relationship, and will take appropriate action up to and including dismissal.

Put succinctly, Good Return has zero tolerance for all forms of sexual exploitation, transactional sex, sexual abuse and harassment (SEAH) in relation to Good Return programs and operations. This applies to its employed staff, its volunteers, its ambassadors, its board members, its contractors or those of its in-country partners.

All such allegations will be investigated in a timely manner.

It will deal firmly but fairly with all proven instances of such conduct, with the interests of the victim/survivor central.

1.3 This Policy can also be found on Good Return's website. Note that this Policy does not replace any part of Good Return's Child Protection Policy (also on our website); thus, the provisions of this PSEAH Policy will only apply to victims/survivors over the age of 18.

2 MINIMUM OPERATING STANDARDS

2. There are *eight Minimum Operating Standards* underpinning this Policy. These standards are recognised globally with regard to PSEAH in the humanitarian sector for UN and non-UN staff and were developed after comprehensive consultation processes.

2.1 The eight Minimum Operating Standards include

1. Effective policy development and implementation
2. Co-operative arrangements
3. A dedicated department/focal point that is committed to PSEAH
4. Effective and comprehensive communication from head office to the field on expectations regarding raising beneficiary awareness on PSEAH
5. Effective community based complaints mechanisms, including victim assistance
6. Effective recruitment and performance management
7. Effective and comprehensive mechanisms established to ensure awareness-raising of PSEAH among all personnel

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8. Internal complaints and investigations procedures in place.

Each is commented upon briefly below:

Effective Policy development and implementation

We have developed, and will implement, this Policy having regard to the nature of Good Return's activities in each country in which we operate, with due regard to (i) relevant cultural issues and (ii) the need to educate our staff, volunteers, contractors and in-country partners.

Co-operative arrangements

Our approach will ensure that all stakeholders including staff, volunteers, contractors and in-country partners will clearly understand the behaviour expected of them, and that it is unacceptable to ask for sexual favours in order for a person to receive assistance or access to assistance.

A dedicated department/focal point that is committed to PSEAH

We have identified a need to have an appropriate person in place in each of our main centres of activity namely Sydney and Phnom Penh.

Effective and comprehensive communication from head office to the field on expectations regarding raising awareness of PSEAH to those who may be affected

This Policy, our staff Code of Conduct, and the PSEAH training programme are the key means by which our requirements will be disseminated. Evidence of completion of the training will be recorded in our online learning management system.

Effective community based complaints mechanisms, including victim assistance

We have elected to develop a separate Complaints Handling Process that reflects the specific requirements of the Code and of DFAT.

Effective recruitment and performance management

In addition to being made aware of the Policy requirements, staff, volunteers and contractors will undergo a more rigorous selection process, depending on the exact nature of their intended role.

Effective and comprehensive mechanisms to ensure awareness of PSEAH among personnel

The development of our own staff Code of Conduct, material on our website, this Policy itself and its associated training programme, will establish the required level of awareness.

Internal complaints and investigations procedures in place.

See Section 5 for the Complaints procedure applicable to this Policy

3 DEFINITIONS APPLYING TO THIS POLICY

Child/Children means anyone under the age of 18 years

Emotional or psychological abuse includes humiliating and degrading treatment such as bad name calling, intimidation, constant criticism, belittling, persistent shaming, solitary confinement and isolation

Focal Person a senior member of Good Return staff who will act as the first point of contact for a victim/survivor of SEAH, and whose initial responsibility will be to deal with the matters set out in

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s5.1 of this Policy. Initially, from 2019 onwards, there will be two such persons appointed: one in Sydney and the other in Phnom Penh. This mix will be reviewed regularly.

Fraternisation is any relationship that involves, or appears to involve, partiality, preferential treatment or improper use of rank or position, including but not limited to voluntary sexual behaviour. It could include sexual behaviour not amounting to intercourse, a close and emotional relationship involving public displays of affection, private intimacy, or public expression of intimate relations.

Good Return staff means any paid employee, in-country personnel, volunteer, contractor, Director or ambassador.

Personnel are either employed by an organisation, engaged by an organisation on a subcontract basis, or engaged by an organisation on a voluntary or unpaid basis. Personnel can include paid staff, volunteers, interns, trustees, board members

Safeguarding: Actions, policies and procedures that create and maintain protective environments to protect people from exploitation, harm and abuse of all kinds

Serious: where the SEAH activity has been accompanied by threats of or actual violence or other forms of coercion, has been taking place repeatedly over a period of time, has been perpetrated in conjunction with others (whether our staff or not), or in the opinion of the relevant senior manager is or has been so egregious as to warrant Board referral

Sexual abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual offences including but not limited to: attempted rape (which includes attempts to force someone to perform oral sex); and sexual assault (which includes non-consensual kissing and touching). All sexual activity with someone under the age of consent (in the law of the host country or under Australian Capital Territory law (16 years), whichever is greater) is considered to be sexual abuse

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

Sexual harassment: A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favours, or engages in other unwelcome conduct of a sexual nature, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.

Sexual harassment can take various forms. It can be obvious or indirect, physical or verbal, repeated or one-off and perpetrated by any person of any gender towards any person of any gender. Sexual harassment can be perpetrated against beneficiaries, community members, citizens, as well as staff and personnel. Some examples of behaviour that may be sexual harassment include:

- staring or leering
- unnecessary familiarity, such as unwelcome affection or touching
- suggestive comments or jokes
- insults or taunts of a sexual nature
- intrusive questions or statements about your private life
- displaying posters magazines or screen-savers of a sexual nature

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- sending sexually explicit emails or text messages ('sexting')
- inappropriate advances on social networking sites
- accessing sexually explicit internet sites
- requests for sex or repeated unwanted requests to go out on dates
- behaviour that may also be considered to be an offence under criminal law such as physical assault, indecent exposure, sexual assault, stalking or obscene communications

Staff: Any person who works for or represents an organisation whether or not she/he is compensated monetarily and including contractors

Serious Incident: An adverse event, whether actual or alleged, which results in or risks significant harm to Good Return's work, beneficiaries or reputation; loss of Good Return's money or assets, damage to Good Return's property, significant reputational damage to ACFID, the Australian Aid program or the ACFID Code of Conduct.

Transactional Sex: The exchange of money, employment, goods or services for sex, including sexual favours

Unacceptable Risk: the portion of identified risk that cannot be tolerated, and that must be either eliminated or controlled. For people deemed an unacceptable risk, control mechanisms are not considered appropriate

Victim/Survivor: A person who is, or has been, sexually exploited, harassed or abused

Zero tolerance: is acting on every allegation in a fair and reasonable way with due regard for procedural fairness

3.1 Staff behavioural standards regarding SEAH

Good Return has zero tolerance of SEAH in all its forms, and expects its staff to comply **strictly** with this Policy. We will clearly and explicitly communicate to all staff

- (i) the behaviour expected of them
- (ii) the consequences of their failure to meet our expectations (with a key consideration being, subject to procedural fairness, that the interests of the Victim(s)/Survivor(s) are central) and
- (iii) the mandatory nature and scope of our internal SEAH reporting mechanisms (see 5 below).

Those staff must then ensure that the communities for whom they do work also understand the behaviour expected of those staff persons, so that they (the communities) will recognise what is unacceptable behaviour by Good Return staff (such as being asked to provide sexual favours).

4 COMMUNICATION OF THIS POLICY

This policy is to be found on Good Return's website. We have produced training material designed to illustrate the key features of this Policy. It is explicitly referenced as part of our Staff Code of Conduct.

4.1 Training

The training referred to in 2.1.4 will be conducted through our internal learning management system (RIF Academy), and will include two versions of a SEAH module, one for our staff and the other for

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use by external parties such as our local partners. All will be required to revisit this training on an annual basis, or more frequently if updates are introduced.

The RIF Academy has the ability to record staff access, in order to facilitate monitoring of completed training. Where staff are relatively inexperienced and are due to be sent on deployment overseas, specialised training in SEAH will be provided as part of the normal induction process for such staff .

5 COMPLAINTS HANDLING AND REPORTING

Good Return operates with zero tolerance of inaction in relation to a known or suspected or alleged SEAH incident(s). Prevalence of SEAH is a failure of responsibility. We are not only accountable to our funders but also to the communities for whose benefit our work is intended. Strong reporting allows us to monitor SEAH, understand risks, improve assurance and work to improve systems and safeguards accordingly. Reporting of SEAH is therefore a core obligation of our work.

It is the obligation of every member of staff to report any known, suspected or alleged incident of SEAH, or non-compliance with this Policy, initially to the appointed Focal Person. As previously noted, Good Return's overall approach to PSEAH needs to be victim/survivor-centred.

So, what are the elements of such an approach?

- Expected behaviour of our staff is communicated to all stakeholders
- Complaints mechanisms are accessible to victims/survivors and witnesses
- Investigation processes prioritise the safety and needs of the victims/survivors
- Responses are sensitive to the wishes and safety of victims/survivors
- Victims/survivors receive appropriate assistance in a timely and effective manner
- Victims/survivors are treated with dignity and respect
- Victims/survivors are involved in decision making
- Victims/survivors are provided with comprehensive information
- The privacy and confidentiality of all concerned are protected
- There is no discrimination based on gender, age, race/ethnicity, ability, sexual orientation, or other characteristics
- There is consideration of the need for counselling and health services to assist the victim/survivor with their recovery
- A strong "do no harm" focus
- Even when it is apparent the complaint is not covered by our PSEAH Policy, we provide assistance to the victim/survivor to address their complaint in a sympathetic and considerate fashion. An example might be where it is established that the complaint in fact involves an employee of another organisation that Good Return is working alongside.

5.1 Focal Person

Good Return has appointed Focal Persons to deal with SEAH matters; currently one in Sydney and one in Phnom Penh. For the purpose of continuity, the role or position of that person is given in preference to a name .

Role: The Focal Person undertakes a key role in raising awareness throughout Good Return of SEAH and in co-ordinating, supporting and advising on the development and implementation of the PSEAH Policy and practices.

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The Focal Person:

- is the 'first responder' to whom all circumstances (including complaints) within the ambit of this Policy are either referred or reported to
- is understanding, able to handle reports of SEAH with speed, understanding and empathy
- is entrusted to receive, handle and record sensitive and confidential information, principally from Victims/Survivors, with the *highest degree* of accuracy and security
- ensures that the needs of the Victim(s)/Survivor(s) met properly and that the overall approach does cater and address their needs from the outset, whether it be referring them to other services available to them, or providing them with appropriate assistance, or being able to report back to them the results of their complaint (all features of a survivor-centred approach to PSEAH)
- provides details (including to Victims/Survivors) of how to report SEAH allegations or incidents (even in circumstances where the complaint should in fact be more properly directed to another organisation, or be dealt with under a different process)
- maintains a highly confidential database, normally only accessible by the Focal Person
- describes to Victims/Survivors how we assure the confidential handling of reporting mechanisms
- offers options for making anonymous reports, and
- informs all staff how to easily access and use the reporting mechanism

5.2 Reporting

When there is a complaint involving any breach or alleged breach of this Policy, we do at the outset need to consider whether there is evidence of:

1. Possible criminal behaviour:

Report immediately to the correct law enforcement agency where it is safe to do so AND where it is in accordance with the wishes of the Victim(s)/Survivor(s).

Reporting obligations must be in accordance with the laws of the country in which the complaint arises or in which the Victim(s)/Survivor(s) normally resides (whichever is the 'forum conveniens').

2. Possible need for a disciplinary or misconduct investigation: as a result of any known, suspected or alleged incident of SEAH or non-compliance with this Policy by a member of staff.

Whichever of the above situations applies, Good Return CEO or relevant Focal Person will be immediately advised. Wherever possible at this stage the Victim(s)/Survivor(s) should be referred to in a de-identified manner which is consistent with a survivor-centred approach (this may not be possible where a report to criminal law authorities is envisaged).

Senior Good Return management will make an immediate decision about whether the incident or event is required to be reported to ACFID and/or DFAT in accordance with their respective Codes.

DFAT expects two kinds of incident reporting:

Mandatory and immediate (within two working days of becoming aware of an alleged incident) reporting by us of any alleged incident of SEAH related to the delivery of DFAT business. This includes any alleged incident that poses a significant reputational risk to DFAT, for example, an allegation against one of our senior staff members

Mandatory reporting (within five working days) by us of any alleged non-compliance with this Policy; for example, failure to adhere to any aspect of this PSEAH Policy

Failure to report to DFAT as set out above will be viewed as an incident of non-compliance.

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Senior Good Return management will also make an immediate decision about whether (i) any individual member of staff accused of SEAH should be temporarily suspended or re-assigned pending further inquiries and (ii) the matter is sufficiently serious to make a brief report to our Board. Irrespective of the findings of the relevant government entities or police inquiries, the Good Return Board will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be done sensitively. *Every effort will be made to ensure confidentiality is maintained for all concerned and that accepted standards of procedural fairness are followed. Information will be handled and disseminated on a need-to-know basis only.*

3. *Mechanisms for victims/survivors making a report:* these will vary according to local circumstances. The victim/survivor may make an initial verbal complaint or report to any member of Good Return staff..

Appendix A shows the template to be used in relation to SEAH incidents. This follows the requirements as required by DFAT (see Appendix 2). Consistency of reporting will facilitate this reporting process, enable monitoring of incidents, conduct analysis of matters such as repetitive conduct, and highlight further training needs. Over time, we will also ensure that the language and any symbols used in this report are appropriate, relevant and sensitive to the culture of the communities with which we work.

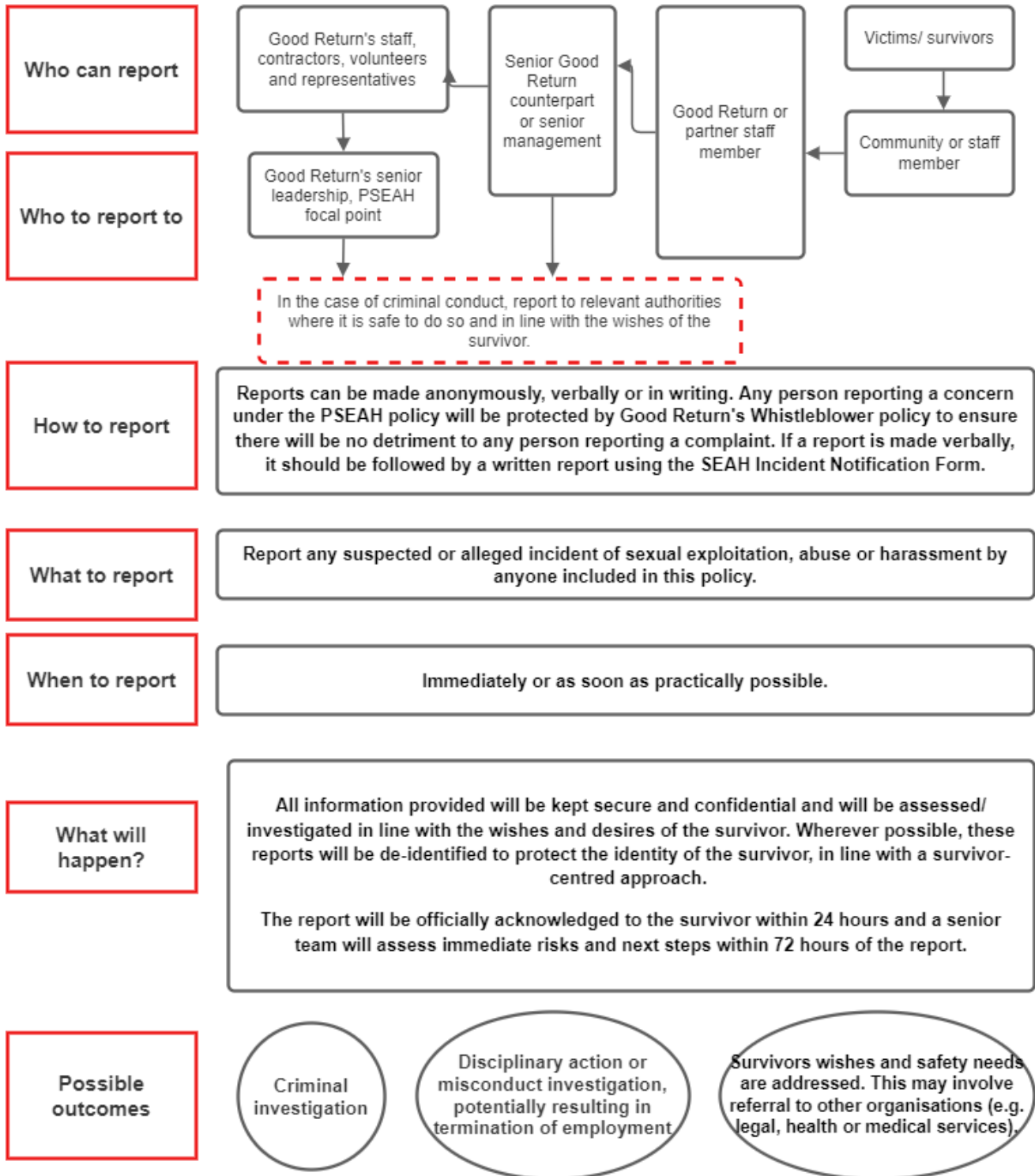
The following diagram illustrates the SEAH Reporting Process:

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SEXUAL EXPLOITATION, ABUSE & HARASSMENT REPORTING PROCESS

Good Return adopts a **zero tolerance** approach to sexual exploitation, abuse and harassment (SEAH).

We recognise the importance of a **survivor-centred approach** which prioritises the rights, needs, wishes and empowerment of victims/ survivors of SEAH. This means that all SEAH complaints are investigated sensitively and confidentially with primary concern for the survivor and any response is sensitive to the wishes and protection of the survivor.



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5.3 Investigative procedures/processes

Recognising that SEAH complaints will usually involve matters of high sensitivity, personal privacy, and emotional turmoil, we have determined that such complaints must be dealt with outside the terms of Good Return's Complaints Policy.

We will respond in a professional, confidential, empathetic and timely manner to all SEAH concerns or allegations. All concerns or allegations must always be taken seriously, and investigated and acted upon where appropriate, in line with our safeguarding principles listed below:

- robust and accountable case management:
- all allegations of SEAH, and subsequent follow-up, will be documented in a secure and confidential database to ensure accountability
- the report will be officially acknowledged to the victim/survivor within 24 hours
- a senior team will assess immediate risks and next steps within 72 hours
- Good Return will carry out independent, safe, and discreet investigations. Depending on the severity of the complaint/allegations, we may consider using trained external investigator(s).
- we will recognise the rights of, and duty of care to, everyone involved, including the victim/survivor, witnesses and the subject of the complaint
- Good Return will take swift and appropriate action against staff who are found to have committed SEAH. This may include administrative or disciplinary action, and/or referral to the relevant local authorities if appropriate and safe to do so (and if the victim/survivor agrees)
- an independent and gender representative decision making panel will be assigned in every investigation to ensure impartiality, transparency, and accountability
- the decision making process will be subject to scrutiny by the Board
- victims/survivors of SEAH are entitled to support services and Good Return commits to refer victims/survivors to competent support services as appropriate and according to their needs
- support may include specialist psychosocial support such as counselling, medical assistance and legal counselling
- assistance will be made available regardless of whether a formal internal response is carried out (such as an internal investigation)

5.4 Retaliation

Good Return will take action against anyone, whether they are the subject of a complaint or not, who seek or carry out retaliatory action against victims/survivors or other witnesses. Staff may be subject to disciplinary action, up to and including termination of employment. Others who work with Good Return may have their relationship with Good Return terminated.

6. Recruitment

In compliance with applicable laws, Good return is committed to prevent past perpetrators of SEAH from being (re)hired or (re)deployed. The Human Resources team will ensure that robust recruitment screening processes are undertaken for **all** staff, in particular for past misconduct.

As part of this, all staff manuals, application forms, interviews and references address requirements in relation to recent police checks, verbal referee checks and working with vulnerable people checks (as appropriate), or local specific equivalent.

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APPENDIX 1 : SEAH Incident Reporting Form

Use this form to report any suspected or alleged incidents of SEAH. You do not need to have witnessed the SEAH yourself, it is enough to suspect it has occurred.

Good Return takes a survivor-centred approach. Incidents should only be reported where it is safe to do so and in line with survivor's wishes. Information identifying individuals does not need to be reported if the survivor wishes to remain anonymous.

Information collected in this form may be shared to:

- Senior management of Good Return
- DFAT, under mandatory reporting requirements

Declaration

By completing and submitting this form, I declare that:

I have read, understood and agreed to the collection, use and disclosure of my personal information in accordance with this incident notification form.

- I confirm that the victim/survivor is aware and they have consented to me providing information on this incident, as outlined in this incident notification form.
- I confirm that if any whistleblowers have provided their details in this form, they have consented to do so.

Name

Signature

Date

| Names(s) of person reporting and contact details | | | |
|--|--|----------|--|
| Name | | Phone | |
| Organisation | | Email | |
| Position | | Location | |

Notification details

Good Return takes a survivor centred approach to the reporting of SEAH. Please provide as much information as possible, in line with the wishes of the survivor.

| Details of the program and partner relating to the incident | |
|--|-------------------------------------|
| Program or activity | |
| Location (village, province, country) | |
| Name of partner organisation associated with the program or activity | |
| Details of the incident | |
| Type of complaint (select one or more) | Sexual exploitation Sexual abuse |

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| | Sexual harassment Policy non-compliance Not sure |
| Date(s) of alleged incident | |
| Location (village, province, country) | |
| Date you received the report or became aware of the complaint | |
| Details of the alleged incident | |
| Support provided to the victim/ survivor | |
| What support has been provided to the survivor? (e.g. medical services, counselling) | |
| Have referrals been made to support services such as a medical facility or counselling service? (If yes, please provide details) | |
| Reporting to authorities | |
| Are local police aware of the incident? (if yes, please provide a contact name and details for the relevant local police) | |
| Have any other authorities been informed? (if yes, please provide details) | |
| Other information (please provide any other relevant information here that has not already been mentioned above) | |
| | |

| Response Action Plan | | |
|-----------------------------|---------------------|----------------|
| Date | Action Taken | By Whom |
| | | |
| | | |
| | | |

Report Received by:

Date: DD/MM/YYYY

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APPENDIX 2 DFAT Incident Report Form



Australian Government

Department of Foreign Affairs and Trade

Sexual Exploitation, Abuse and Harassment (SEAH) Incident Notification Form

What is this form for?

In accordance with the Department of Foreign Affairs and Trade (DFAT) *Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy*, all DFAT staff and all DFAT partners must report alleged sexual exploitation, abuse and harassment (SEAH) incidents when they occur in the delivery of DFAT business. This form is for organisations or individuals (including DFAT staff, and members of the community) to report an alleged incident to DFAT. For more information please see the DFAT PSEAH Policy available at www.dfat.gov.au/pseah.

Please complete the form below and email to: seah.reports@dfat.gov.au. If you do not have email access please telephone +61 2 6178 5100 to report a SEAH incident. If you require assistance in completing this form please contact us by email or telephone. It may not always be obvious if a SEAH incident relates to a DFAT program or activity. If in doubt please still report.

What about the privacy of those included in this form?

DFAT takes a victim/survivor centred approach to the reporting of alleged SEAH incidents. Incidents should only be reported where it is safe to do so and where it is in line with the victim/survivor's wishes. Information that identifies individuals does not need to be reported.

Privacy Notification

This notice explains how DFAT will collect, use and disclose the personal and sensitive information collected through this form in accordance with our obligations under the Australian Privacy Principles (APP) and the *Privacy Act 1988* (Cth) (Privacy Act).

Personal information may include an individual's name, signature, address, telephone number, date of birth and any commentary or opinion about a person. Sensitive information may include information about a person's health or racial/ethnic origin.

DFAT's collection, use and disclosure of information collected in this form

DFAT reasonably believes that the collection, use or disclosure of the information, including personal information in this form is necessary in order for DFAT to:

- manage the risks of SEAH and SEAH incidents in the delivery of our business;
- take appropriate action where it suspects that unlawful activity or misconduct of a serious nature has been or is being engaged in, in the context of DFAT's business; and
- lessen or prevent a serious threat to the life, health or safety of an individual or to public health or safety, in the context of DFAT's business.

If we are unable to collect your personal information, DFAT may not be able to contact you and to make further enquiries about the alleged incident you have reported.

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DFAT may share the information provided in this form to:

- senior management in relevant line areas within DFAT to enable the department to:
 - (i) effectively manage its contracts and grants; (ii) conduct internal reviews in relation to DFAT's operations; and (iii) identify and address any integrity issues relating to DFAT's systems or operations; and
- senior management in DFAT's partner organisation (for example, managing contractor, non-government organisation or multilateral organisation) to enable the partner organisation to:
 - (i) conduct internal reviews in relation to its operations; and (ii) identify and address any integrity issues relating to its systems or operations.

DFAT's Privacy Policy

Further information about how: (a) you can access and seek correction of personal information that DFAT holds about you; and (b) to make a complaint if you have a concern or believe DFAT may have breached an Australian Privacy Principle is available through the DFAT Privacy Policy: <http://dfat.gov.au/about-us/about-this-website/pages/privacy.aspx>

If anyone related to this notification is in imminent danger:

In Australia - please email to your employer's confidential email address.

Outside Australia - please phone or visit your local law enforcement office (if safe to do so) or another support service (eg. a medical centre, hospital, sexual violence support centre, rape support centre, etc).

Declaration

By completing and submitting this form, I declare that:

I have read, understood and agree to the collection, use and disclosure of my personal information in accordance with this incident notification form.

- I confirm that the victim/survivor is aware and they have consented to me providing information on this incident, as outlined in this incident notification form.
- I confirm that if any whistleblowers have provided their details in this form, they have consented to do so.

If you do not consent or if you have any concerns about how the personal information collected in this form will be used, disclosed or shared, you should notify DFAT as soon as possible by emailing seah.reports@dfat.gov.au or telephoning +61 2 6178 5100.

Name _____

Signature _____

Date

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Notification Details

In line with the *PSEAH Policy* principles, DFAT takes a victim/survivor centred approach to the reporting of SEAH. Please provide as much information as possible, and in line with the wishes of the victim/survivor.

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| 1. DFAT Program/Activity/Agreement details related to the incident | |
| DFAT Program or Activity: (e.g Australian NGO Cooperation Program (ANCP), Australian Humanitarian Partnership Program, public diplomacy program, etc) | |
| Location of DFAT Program or Activity: (country, province, city/village/town etc. Provide as much detail as possible) | |
| DFAT Agreement Title: (can be found in the DFAT agreement document) | |
| DFAT Agreement Number: (where available; may be found in the DFAT agreement document) | |
| DFAT Agreement Type: (e.g grant, agreement etc) | |
| Name of DFAT partner(s) associated with the program/activity/agreement: (e.g nams; and downstream partners ¹) | |
| 2. Details of Reporting Organisation or Individual | |
| <i>Note, please consider the privacy and protection of any individuals reporting SEAH (whistleblowers). Only provide details of any individuals if permission has been granted to share this information with DFAT, as per the privacy declarations on p.2.</i> | |
| Name of Reporting Organisation/Individual | |
| Contact name: | |
| Telephone: | Email: |
| 3. SEAH Incident | |
| Type of allegation: (please nominate one or more allegation types – definitions below) | |
| Date(s) of alleged incident: | |
| Location of alleged incident: (country, province, city/village/town etc. Provide as much detail as possible) | |
| Date incident report was received by your organisation: | |
| Details of alleged incident: (details of alleged incident:’ any specific vulnerabilities such as disability, sex worker etc) | |
| Is the victim/survivor a recipient or client of a DFAT program/activity? If so, please provide details (e.g. name of residential facility, name of volunteer host organisation etc) | |

¹ A downstream partner is a supplier, individual or organisation engaged by a DFAT partner to perform DFAT business.

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| <p>What support has been provided to the victim/survivor? <i>referral to a medical clinic, counselling services, etc)</i></p> | |
| <p>Have referrals been made to support services such as a medical facility or counselling services? (<i>Provide details</i>)</p> | |
| <p>What investigation or reporting has been undertaken by the DFAT partner organisation? <i>(please provide details e.g. an internal investigation will be conducted and a final report produced etc)</i></p> | |
| <p>4. Reporting to police or other authorities</p> | |
| <p>If the alleged incident/allegation occurred outside Australia, are local police aware of the incident/allegation? <i>If yes, please provide:</i></p> <ul style="list-style-type: none"> <i>A contact name and contact details for the local police including the full title of the local police station</i> <i>Date the incident/allegation was reported to local police</i> | |
| <p>Have the Australian Federal Police (AFP), either in Australia or overseas, been informed of the incident/allegation? If so, what is their response or proposed action? <i>If yes, please provide:</i></p> <ul style="list-style-type: none"> <i>The response or proposed action from the AFP</i> <i>AFP contact name and contact details</i> <i>Date the incident/allegation was reported the AFP</i> | |
| <p>Have any other authorities, other than the local police or AFP been informed of the incident/allegation? <i>If yes, please provide:</i></p> <ul style="list-style-type: none"> <i>The name of the other authority</i> <i>A contact name and contact details for the other authority</i> <i>Date the incident/allegation was reported the other authority</i> | |
| <p>6. Other information <i>(please provide any other relevant information here that has not already been mentioned above)</i></p> | |

[1] Sexual exploitation refers to 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.

[2] Sexual abuse refers to the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual offences including but not limited to: attempted rape (which includes attempts to force someone to perform oral sex); and sexual assault (which includes non-consensual kissing and touching). All sexual activity with someone under the age of consent (in the law of the host country or under Australian Capital Territory law [16 years], whichever is greater) is considered to be sexual abuse.

[3] A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favours, or engages in other unwelcome conduct of a sexual nature, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.

Sexual harassment can take various forms. It can be obvious or indirect, physical or verbal, repeated or one-off and perpetrated by any person of any gender towards any person of any gender. Sexual harassment can be perpetrated against beneficiaries, community members, citizens, as well as staff and personnel. Some examples of behaviour that may be sexual harassment include:

- staring or leering;
- unnecessary familiarity, such as unwelcome affection or touching;
- suggestive comments or jokes;
- insults or taunts of a sexual nature;

Prevention of Sexual Exploitation, Abuse & Harassment Policy

- intrusive questions or statements about your private life;
- displaying posters magazines or screen savers of a sexual nature;
- sending sexually explicit emails or text messages;
- inappropriate advances on social networking sites;
- accessing sexually explicit internet sites;
- requests for sex or repeated unwanted requests to go out on dates; and
- behaviour that may also be considered to be an offence under criminal law such as physical assault, indecent exposure, sexual assault , stalking or obscene communications.

[1] Policy non-compliance refers to the failure to abide by DFAT's *Preventing Sexual Exploitation, Abuse and Harassment Policy* available at www.dfat.gov.au/pseah