

# Protection from Sexual Exploitation, Abuse and Harassment Policy

## Policy Statement

Transform Aid International (TAI) serves vulnerable and marginalised communities in development and disaster contexts. In the capacity that we serve, we are equipped with resources and services which we bring to the community for their relief and development. This power differential and subsequent vulnerabilities in the communities in which we serve increases the risk of exploitation, abuse and harassment

As a Christian organisation, we are called to be good stewards of resources and to seek justice for those who are not able to use their voice. We are committed to the ACFID Code of Conduct and other sector standards.

TAI acknowledges broader power imbalances based on gender, ability, ethnicity and indigenous status, religion, sexual orientation, gender identity, age, health, and poverty. These intersecting vulnerabilities require an inclusive and proactive safeguarding approach.

TAI has zero tolerance for sexual exploitation, abuse, and harassment (SEAH). Preventing all forms of misconduct and ensuring respectful, inclusive behaviour is a core organisational commitment.

TAI takes a **survivor-centred approach**, respecting the dignity, privacy, and wishes of those affected. Confidentiality will be upheld unless there is a risk of harm, and support such as counselling will be considered.

## Scope and Purpose

This policy is applicable to all people involved in our work. This means employees, volunteers, International partners and consultants and all TAI Representatives. Our Implementing Partners, who have direct contact with the community and beneficiaries, are required to implement this policy through development of their own policy and practices.

This policy aims to develop an organisation wide culture of increased awareness of SEAH, including strategies of risk mitigation. The policy endeavours to ensure the implementation of principles and practices which prevent SEAH in the TAI workplace, our partner organisations and the communities we seek to serve.

This policy applies to all adults engaged in our programs, with a focus on those most at risk. Safeguarding measures must be embedded, accessible, and clearly communicated to all TAI Representatives.

Our **Child Safe Policy** applies to all matters involving children.



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COLLABORATIVE



LEARNING

## **Principles**

TAI is committed to the following principles on protection from sexual exploitation, abuse and harassment (“PSEAH”):

### **Principle 1: Zero tolerance for sexual exploitation, abuse and harassment.**

TAI has zero tolerance for acts of SEAH. SEAH is an abuse of power, violates the rights of victim-survivors and undermines the integrity and impact of TAI’s work. SEAH is never acceptable. TAI has zero tolerance for inaction to prevent, report or respond to SEAH; and zero tolerance for retaliation against victim-survivors or whistleblowers. This does not mean having zero incidents of SEAH being reported. Reporting is mandatory.

Exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour by TAI Representatives is prohibited. This includes the exchange of assistance that is due to program participation.

TAI Representatives are prohibited from engaging with commercial sex workers or engaging in prostitution of any form whilst on a work trip (including travel time, field visits and leisure time) and representing TAI, even if commercial sex work is legalised in that country. This kind of conduct goes against our organisational values as per the TAI Safeguarding Code of Conduct and any such conduct, as substantiated, will constitute grounds for disciplinary measures including summary dismissal, under TAI’s relevant policies or discontinuation of partnership/funding under relevant MOUs and partnership/funding agreements.

Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of the majority or the locally recognised age of consent. Mistaken belief in the age of the child is not a defence.

Sexual relationships between TAI Representatives/Implementing Partner staff and program participants, since they are based on inherently unequal power dynamics, undermine the credibility and integrity of the work of TAI. For this reason, sexual relationships between TAI Representatives and program participants are prohibited and must be reported in accordance with TAI’s CS and SEAH Allegation Management Procedure. Sexual relationships between Implementing Partner staff and program participants, are strongly discouraged. To protect against exploitation and abuse in cases where there is a sexual relationship between Implementing Partner staff and program participants, a conflict of interest must be declared.

### **Principle 2: Take a victim-survivor centred approach to SEAH prevention and response**

TAI will take a ‘do-no-harm’ approach prioritising the rights, safety, needs, wellbeing and dignity of victim-survivors. This approach treats the victim-survivor with dignity and respect; considers their safety; involves the victim-survivor in decision making at their pace; provides the victim-survivor with accessible information; protects privacy and confidentiality; considers the need for support to assist the victim-survivor with their recovery; and takes a trauma-informed approach to avoid further traumatising or re-traumatising the victim-survivor.

### **Principle 3: Promote inclusion and equity and recognise diversity**

TAI is committed to inclusivity and equity, ensuring that all people, regardless of disability, gender, sexual orientation, or socio-economic background, are afforded protection and support. TAI will work to address barriers to participation, protection, reporting and support such as

language, safety, discrimination and accessibility. Special attention should be given to people with disabilities and gender-diverse people, who may be at higher risk of exploitation and abuse. Power imbalances and the intersection of gender with other identities can further increase the likelihood of SEAH occurring. TAI is committed to ensuring that people with disabilities receive information in formats they can easily access, making accommodations for their needs, addressing gender inequalities and power imbalances, promoting inclusive practices, and establishing clear mechanisms they can use to report concerns or abuses, while also addressing the unique risks and challenges faced by these diverse groups.

#### **Principle 4: Prioritise prevention**

TAI will be proactive in minimising the risk of SEAH and creating safe environments in all contexts, both in the physical environment and online. Actions to prevent SEAH and promote safety are embedded in policies, programs, recruitment, staff training and daily operations to minimise risks.

#### **Principle 5: Adopt an empowering and participatory approach**

TAI will consult people and communities, especially women, girls, people with a disability, and other groups in vulnerable situations to inform the design of PSEAH approaches. TAI will build on and strengthen existing community and national mechanisms where these are already established and trusted within the community to ensure that efforts to assess risks and design SEAH responses become more effective, culturally relevant, and sustainable. Using a participatory approach builds trust, increases relevance and promotes shared responsibility for safeguarding.

#### **Principle 6: Reporting incidents is mandatory**

Immediate reporting of SEAH concerns is mandatory. Reporting mechanisms, management responses, investigations and support should be clear, trustworthy, culturally appropriate, confidential, and accessible. All those involved in an incident or allegation should be protected from retaliation, have their confidentiality and dignity respected and receive appropriate support. Procedural fairness is essential when making decisions that affect the rights or interests of any party involved, including victim-survivors, complainants, witnesses, whistleblowers, and the subject(s) of concern (alleged perpetrator).

#### **Principle 7: Embed safeguarding into organisational culture and leadership**

TAI will embed the prevention of SEAH in governance, leadership and organisational culture. Our leadership will act with integrity and help create and maintain a respectful environment which prevents, reports and responds to SEAH. Leaders and managers at all levels have particular responsibility to resource, develop, implement and support PSEAH systems to proactively identify, monitor and address SEAH risks and reports. TAI is committed to building a strong safeguarding culture through clear accountability, leadership commitment, investment of resources and continuous review and improvement of policies and practices.

### **Policy Objectives**

The objectives of this policy are to:

- Promote appropriate standards of conduct with respect to SEAH through consistent and intentional awareness raising and training
- Implement increased and ongoing capacity and awareness raising strategies to ensure that all TAI Representatives and Implementing Partner staff know their

rights and responsibilities regarding PSEAH alongside other key policies (as per the Related Policies and Procedures section below) which must work in tandem with this.

- Create and maintain an environment which is free from workplace sexual harassment and promotes the implementation of relevant codes of conduct and behavioural standards.
- Prevent the SEAH of adults, including vulnerable adults, who interact/engage with TAI Representatives and/or Implementing Partner staff during the course of our work.
- Encourage the reporting of behaviours which breach this policy and related policies, notably the EEO, Anti-Discrimination, Harassment and Bullying, and Child Safe policies.
- Continuously socialise and train our people on complaints handling and whistleblowing policies and procedures based on the principles of procedural fairness, ensuring all complaints are managed in a sensitive, fair, timely and confidential manner as appropriate.
- Ensure protection from any victimisation or reprisals for the complainant and the whistle blowers.

## What does the policy look like in practice?

TAI recognises that SEAH can occur in workplaces and communities in all sectors and countries. Given how widespread SEAH is and the complex settings in which TAI operates, most activities are expected to be rated at least low-medium risk of SEAH. TAI takes a risk-based approach to PSEAH within our own operations and with partners that is proportionate to risk but will, at a minimum, apply the Essential Standards in Australia and overseas. The table below provides guidance on risk assessment.

Level of Risk	Examples of activities	Applicable DFAT standards
Very low risk	<ul style="list-style-type: none"> <li>• One off delivery of goods or services in a low-risk setting</li> <li>• Remote desk based work</li> </ul>	None or possibly Essential Standards if in development or humanitarian settings
Low to medium risk	<ul style="list-style-type: none"> <li>• Attendance at public events e.g. food service, delivery of goods</li> <li>• Provision of group training, attendance at meetings</li> </ul>	Essential Standards
High risk	<ul style="list-style-type: none"> <li>• Implementation of programs in development and humanitarian settings</li> <li>• Activities where partners may be in positions of trust,</li> </ul>	Comprehensive Standards

	influence, supervision, or authority <ul style="list-style-type: none"> <li>• Infrastructure or construction activities including WASH</li> </ul>	
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Refer to [Appendix 1](#) for a detailed description of the essential and comprehensive standards that apply to each DFAT PSEAH standard: (1) PSEAH policy, procedures and code of conduct; (2) Reporting mechanism and investigation procedures; (3) Risk management processes; (4) PSEAH training; and (5) Recruitment and screening processes

TAI recognises that SEAH risks could be increased based on contextual factors. Safeguarding risks assessments will therefore also include an evaluation of factors, including but not limited to:

- The inherent risks of the location
- High risk activities, e.g. male male-dominated construction projects, humanitarian or disaster response
- Interaction with individuals, especially women who are young adults, have a disability, are of an ethnic, indigenous, religious or sexual minority, are experiencing poverty, are sex workers, are part of families impacted by disasters, are displaced, refugees, migrants or asylum seekers, are part of female headed households, are victims/survivors of trafficking and/or other forms of sexual and gender- based violence, are accessing residential/shelter services
- Access to personal information. E.g. one-to-one contact or online contact, sensitive health information
- The organisational capability of the partner

## Risk Assessment & Governance

TAI implements comprehensive standards to our risk management processes. Safeguarding and PSEAH matters are reported to TAI's Senior Leadership Team and Board via the Compliance Report, which is tabled three times per year or more frequently if required. Safeguarding is identified as one of the organisations key risk categories and is managed in accordance with the Organisational Risk Management Framework and Risk Appetite Statement. Risk matrices are developed at an organisational level and at department and project level. Risk Matrices include mitigation actions to reduce any identified risks which are regularly reported via the Risk Framework Report to the Senior Leadership Team, Board Finance and Risk Committee, and Transform Aid International Board.

The Safeguarding Committee will prepare an annual Safeguarding Action Plan and undertake an annual Safeguarding Self-Audit. The audit will identify the activities that have potential SEAH risks, assess the risk and review staff awareness regarding safeguarding policies and matters.

Safeguarding risks are identified, monitored and managed in accordance with our Organisational Risk Management Framework and Risk Appetite Statement. Risk matrices are developed at an organisational level and at department and project level. Risk Matrices include mitigation actions to reduce any identified risks.

TAI reports numbers of Safeguarding incidents to its Board on a regular basis to allow Board oversight of Safeguarding. The details are not provided to protect vulnerable individuals.

The Safeguarding Committee will prepare an annual Safeguarding Action Plan and undertake an annual Safeguarding Self-Audit. The audit will identify the activities that have potential contact

with children, assess the risk and review staff awareness regarding safeguarding policies and matters.

TAI assesses the safeguarding risk presented by its partnerships through regular due diligence and capacity assessment requirements, as detailed in the TAI Partnership Framework and in accordance with the guidance table provided above.

TAI requires implementing Partners to conduct a safeguarding risk assessment during project design, and then to provide an updated assessment on an annual basis, in line with the annual project planning cycle. These assessments are reviewed by Programs staff for inclusion of consideration of risks to children. TAI staff and advisory support are available to Partners to support in the development, monitoring and review of safeguarding risk assessments.

## Recruitment and Engagement

TAI has a robust recruitment and screening process to minimise the risk of recruiting a person who poses an unacceptable risk of engaging in SEAH. We ensure all TAI representatives understand and commit to professional behaviour standards as outlined in the Safeguarding Code of Conduct. Recruitment and Engagement practices align with DFAT's comprehensive standards.

Procedures include:

- Applicants will be requested to disclose whether they have had a substantiated SEAH claim made against them in Australia or overseas in the Job Application Form or Consultant Agreement.
- Tailored interview questions that match job requirements pertaining to sexual harassment and abuse may be used to determine the full history of past behaviours, beliefs, attitudes, motivations, and values of applicants regarding working with children and vulnerable adults.
- Maintaining and accurate record of the interview process
- A minimum of two verbal reference checks will be conducted, which include questions related to the applicant's general conduct, and where relevant questions related to concerns about a candidate's conduct when working or interacting with children and/or vulnerable adults in the context of sexual harassment, sexual exploitation and abuse. One reference must be from the person's current or most recent employer.
- Signed Safeguarding Code of Conduct.
- Verified National Criminal History Check for each country in which the applicant has lived for 12 months or longer over the last 5 years, and for the individual's countries of citizenship.\* Police checks will be **verified** using original or certified documents and be **less than 12 months old**;
- Working with Children Check\*\*
- Consultants and Contractor screening includes National Criminal History Checks and WWCC (where applicable). Relevant policies (including PSEAH) are provided, and the Safeguarding Code of Conduct must be signed prior to commencement of their engagement.

TAI people including employees, volunteers and all TAI Representatives are responsible for reporting a change in their circumstances to their direct manager or TAI management or the Safeguarding Committee by reporting any disciplinary procedures and current criminal or civil court proceedings relating to harassment, exploitation and abuse. All employment, volunteer and



consultant contracts must contain provisions for disciplinary actions up to and including dismissal for any person who breaches our Child Safe and PSEAH policies and procedures.

\*A statutory declaration that outlines efforts made to obtain a foreign police check, and that discloses any charges and spent convictions related to child protection, may be accepted in lieu.

\*\* WWCC or equivalent will be undertaken as allowed by legislation.

Recruitment and Selection Practices required by implementing partners will be determined in accordance with the safeguarding risk assessment.

## **Safeguarding Code of Conduct**

The Safeguarding Code of Conduct outlines acceptable and unacceptable behaviour in relation to children and vulnerable adults. All TAI representatives must review the Policy and sign the Safeguarding Code of Conduct, agreeing to comply with the principles and standards they contain. A breach of the Code may result in disciplinary action including termination of employment or engagement.

## **Increasing Awareness of PSEAH Obligations Under the Policy**

The Safeguarding Committee together with our International Programs team will increase awareness of PSEAH among TAI Representatives through providing ongoing education and training, technical advice, collaboration with all programs and departments, and day to day guidance. This will be conducted in line with TAI's commitment to communicating expected staff behaviours.

## **Training**

Training in accordance with the Essential Standards is provided, unless the context requires comprehensive standards of training.

- All TAI representatives, including implementing partners and downstream partners will receive basic PSEAH training as part of orientation and induction, and annual refresher training. Training will be tailored to the needs of the partners and delivered as basic training or comprehensive training as required by safeguarding risk assessments.
- Regular Safeguarding spotlights are conducted in staff meetings and via Teams
- Job-specific training including comprehensive training for staff in contexts assessed as high risk, on topics such as victim-survivor centred responses, safety planning and referrals, incident reporting protocols, handling disclosures
- Each department will ensure the requirements are both understood and met by their stakeholders (consultants, contractors, supporters and Implementing Partners) during the yearly cycle and provide the necessary training and support so that those requirements are met.

## **Supporter Engagement with and visits to Project (Locations, Personnel and Beneficiaries)**

TAI recognises the need to implement specific guidelines to manage SEAH risks when allowing supporters to engage with international programs. TAI proactively manages these risks by requesting National Criminal History Checks and WWCCs. All supporters who visit international projects must follow and sign the Safeguarding Code of Conduct and will receive adequate briefing by a suitable TAI Representatives pertaining to appropriate supportive behaviour and engagement both prior to and during visits.

## Reporting, Complaints Handling and Resolution within TAI

All TAI Representatives must immediately report any concerns they have for the safety or wellbeing of adults in relation to sexual harassment, exploitation and abuse as per the Child Safe and SEAH Allegation Management Procedure. Reports related to children should be made as per the same Child Safe and SEAH Allegation Management Procedure. (Or as per the Grievance Policy or Whistleblowing Policy if appropriate).

In cases where a victim-survivor has a concern, they may control whether incidents against them are reported, and/or provide an anonymous report. If a person reports a matter anonymously, TAI may have limited ability to follow up on the report.

TAI commits to:

- treating all concerns raised seriously and ensuring that all parties will be treated fairly.
- meeting country, state or territory specific legislative requirements.
- treating victim-survivors with dignity and respect and ensuring that their needs are prioritised in the actions that the organisation takes to handle the incident. This may include involving them in decision making, providing them with comprehensive information, protecting their privacy and confidentiality, not discriminating, and considering needs for counselling.

Any person who intentionally makes a false allegation or malicious allegation will face disciplinary action.

Further, in the case of concerns of any alleged incident of SEAH against adults, related to the delivery of DFAT business, then TAI must also notify DFAT via [seah.reports@dfat.gov.au](mailto:seah.reports@dfat.gov.au) using the [DFAT Sexual Exploitation, Abuse and Harassment Incident Notification Form](#). This notification must be made within 24 hours of any suspected or alleged incident of SEAH or of policy non-compliance.

Partners, participants and communities involved in TAI funded activities must be informed on how to raise a concern about the safety or wellbeing of someone in threat or undergoing SEAH through a functional community-based complaints procedure linked to the TAI based complaints mechanism.

The following measures can be applied for any TAI Representative who breaches the PSEAH Policy and/or Safeguarding Code of Conduct:

- Meet to discuss the breach and offer an opportunity for the subject to provide their account of the situation.
- Performance management.
- Further education on this Policy, the Child Safe Policy, and the Safeguarding Code of Conduct.
- Formal warning and monitoring of progress against recommendations.
- Transfer to other duties.
- Suspension of the subject pending investigation.
- Internal investigation report to the Police.
- Termination of employment.
- The above measures will apply alongside any criminal investigation where relevant.



## Implementing Partners

TAI acknowledges that a significant portion of its risk profile in relation to SEAH occurs within our international programs portfolio and includes risks relating to our implementing partner organisations and representatives.

TAI's Implementing Partners have their own PSEAH policy and Code of Conduct, or equivalent, in place.

TAI will assess and support Partners to socialise and implement their own policies using TAI's and DFAT's (when required) Policy and Code of Conduct as a minimum standard.

Implementing Partners are required to ensure appropriate standards, in line with the safeguarding risk assessment are met by any downstream partners, or other relevant participating entities, engaged through funded delivery of TAI programs.

It is a requirement that any individuals or partner organisations engaged by TAI report concerns, suspicions or allegations of SEAH in TAI or TAI funded activities to TAI. The TAI Child Safe and SEAH Allegation Management Procedure details how TAI monitors and supports partner-led response and investigation to allegations of child safeguarding incidents

TAI will not knowingly engage in partnerships with any individual or organisation that pose an unacceptable risk to children and adults, or that do not meet TAI's child protection and PSEAH compliance standards.

International Program Coordinators (IPCs) are responsible for supporting Implementing Partners to implement locally relevant PSEAH policies and practices. This includes but is not limited to:

- Regular review of Implementing Partners policies, codes of conduct and compliance.
- Development and review of adequate safeguarding risk assessments, incorporating considerations of risks of SEAH for vulnerable adults.
- Ensuring regular training of partner personnel on PSEAH - including policy implementations, responsibilities and standards of behaviour.
- Monitor implementation of partner policies and practices in relation to PSEAH during partner and project visits, and other monitoring activities.
- Socialisation of reporting mechanisms and minimum expectations and ensuring such mechanisms are shared with participants and other relevant stakeholders. This includes ensuring that Implementing Partners are aware of their reporting obligations under the TAI Child Safe and SEAH Allegation Management Procedure.
- Encouraging the development of a referral network for provision of legal and psychological aid to the victim-survivors of PSEAH.

The TAI IP Safeguarding Advisor will ensure regular review and oversight of PSEAH practice across the portfolio, including through compliance checks, training for IP staff and connection to sector best practice and technical networks.

## Responsibilities

Position	Responsible for:
Director of Risk, Governance and Business Optimisation	<ul style="list-style-type: none"> <li>• Strategic oversight of the policy</li> <li>• Chairing the Safeguarding Committee</li> <li>• Oversight of safeguarding aspects of engaging Board Directors, consultants and suppliers</li> </ul>
The Safeguarding Committee	<ul style="list-style-type: none"> <li>• Reviewing, developing, implementing and managing effective Safeguarding policy and procedures</li> <li>• Ensuring that Safeguarding is embedded into all aspects of TAI's operations</li> <li>• Developing and implementing mechanisms to ensure Safeguarding policies and procedures are being adhered to by TAI Representatives</li> <li>• Identifying and initiating improvements in the way TAI works to ensure policies and procedures are followed</li> <li>• Identifying, responding and escalating, as appropriate, organisational risk within TAI related to safeguarding</li> <li>• Responding to reports of SEAH, and policy non-compliance</li> <li>• Raising the profile of Safeguarding in all TAI's work, promoting proactive communications and raising awareness both internally and externally.</li> <li>• Conducting safeguarding risk assessments, audits and spot checks</li> <li>• Monitoring internal and external compliance with the policy</li> <li>• Providing PSEAH training</li> <li>• Reviewing the policy</li> </ul>
People and Culture Leader	<ul style="list-style-type: none"> <li>• Implementation of recruitment practices</li> <li>• Oversee that the implementation of training for internal staff and volunteers has occurred.</li> </ul>
Director of International Programs	<ul style="list-style-type: none"> <li>• Operational implementation of policy with international Partners</li> </ul>
IP Safeguarding Focal Point	<ul style="list-style-type: none"> <li>• Oversight of child safe and PSEAH safeguarding systems</li> <li>• Participating in relevant communities of practice</li> </ul> <p>In collaboration with the Safeguarding Committee:</p> <ul style="list-style-type: none"> <li>• Raising awareness, coordinating, supporting and advising on the development and implementation of safeguarding policy and practice</li> </ul>

	<ul style="list-style-type: none"> <li>• Responding to reports of PSEAH, child exploitation and abuse, and policy non-compliance</li> <li>• Monitoring implementing partner compliance with TAI's PSEAH policy including through safeguarding health checks</li> <li>• Supporting capacity building of implementing partners</li> </ul>
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Compliance with this policy will be monitored by the positions listed in the table above. Noncompliance with this policy will be managed in accordance with the Disciplinary Policy.

## Accessing the Policy

This policy will be available on TAI's Governance Hub on the Policies and Procedures Teams Channel, and from TAI's websites.

This policy will be provided to all staff during induction.

## Review and Amendment

This policy will be reviewed every three years, or sooner as required, and amendments will be made as required in response to changing circumstances.

## Definitions

**Child:** A child is a person under the age of 18, irrespective of who is counted as child (based on age) in their local country.<sup>1</sup>

**Complainant:** The person who raises the complaint. This may or may not be the alleged victim in the matter.

**Confidentiality:** refers to the protection of personal information. TAI will endeavour to upkeep confidentiality when dealing with concerns, issues and suspected cases, unless a person is at risk of harm to themselves or others.

**Fraternisation:** 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 or private intimacy and the public expression of intimate relations.

**Perpetrator:** this is a person who has been proven to have committed the SEAH.

**Safeguarding:** Preventative measures we put in place to ensure our organisation, Implementing Partner organisations and project activities do not cause harm (e.g. policies and procedures)

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<sup>1</sup> Definition of child from the InterAgency Standing Committee (IASC) Guidelines to implement Minimum Operating Standards for Protection from Sexual Exploitation and Abuse by UN and non-UN Personnel, March 2013.

**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), molestation, and other forms of non-consensual sexual activity. All sexual activity with a child is considered 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.

**Subject of Concern:** This is the person against whom the allegation of SEAH or Sexual harassment has been brought on by the complainant and is the focus of the investigation.

**TAI Representatives:** This term covers TAI activities and TAI funded activities, including TAI subsidiaries, whether in Australia or overseas and includes the following:

- TAI employees
- TAI volunteers
- TAI interns and work experience students
- TAI Board members
- Individual contractors and consultants working for TAI
- Supporters of TAI and TAI's subsidiaries

**Transactional sex:** The exchange of money, employment, goods, services or other benefit for sex, including sexual favours.

**Trauma Informed:** An approach that prioritises understanding, recognising, and responding to psychological and emotional needs of victim-survivors, promoting their well-being and recovery. It emphasises creating safe environments, providing appropriate support, and avoiding re-traumatisation of victim-survivors.

**Victim-Survivor:** A term used to describe a person who is, or has been, sexually exploited, harassed or abused. 'Victim-survivor' acknowledges both the harm suffered (victim) and the resilience or agency of the individual in coping with the aftermath (survivor). This term emphasises a supportive, rights-based approach to addressing their needs and upholding their dignity throughout the reporting and response process.

**Victim-Survivor centric:** is an approach which ensures that victim-survivors' rights and needs are first and foremost, it prioritises the rights and wishes of the victim-survivor. This approach encourages safety, trust and support and ensures the victim-survivor be treated with dignity and respect instead of being exposed to victim-blaming attitudes.

**Vulnerable adults:** Vulnerable adults are people over the age of 18 who may be placed in a position of vulnerability and inability to care for themselves or protect themselves from any harm or exploitation. Individuals could be vulnerable to SEAH due to their: gender, race, ethnicity,

religious identity, mental or physical health, disability, sexual orientation, economic or social status, or being located in disaster or conflict prone regions.

## **Related Policies and Procedures**

This Policy should be read in conjunction with the following:

- Safeguarding Code of Conduct
- Child Safe Policy
- Child Safe and SEAH Allegation Management Procedure
- Code of Conduct
- Project Agreements for International Programs
- Memorandum of Understanding for International Programs

## Appendix 1. DFAT PSEAH Standards

More detailed guidance about implementing this policy can be found in [DFAT's Interim Guidance Manual](#).

Standard Number	Essential Standard	Comprehensive Standard
1. Policy, procedures and code of conduct	<ul style="list-style-type: none"> <li>The organisation has a PSEAH Policy or statement or other documented policies and procedures which meet the expectations of DFAT's PSEAH Policy.</li> <li>The organisation has a Code of Conduct that is consistent with DFAT's PSEAH Policy, which includes the prohibition of transactional sex in high-risk settings. All personnel are required to acknowledge they have read and agreed to the organisation's Code of Conduct.</li> </ul> <p><b>Note:</b> Downstream partners are encouraged to develop their own policies, procedures and codes specific to PSEAH, but may adopt the policies of their upstream partner if appropriate.</p>	<ul style="list-style-type: none"> <li>The organisation has a detailed PSEAH Policy and procedures in place which meet the expectations of DFAT's PSEAH Policy and are subject to regular review. The policy should demonstrate the organisation's commitment to zero tolerance for child exploitation, abuse and harm and/or sexual exploitation, abuse and harassment and establish procedures in line with these standards.</li> <li>The organisation has its own Code of Conduct that is consistent with DFAT's PSEAH Policy, which includes the prohibition of transactional sex in high-risk settings. All personnel are required to acknowledge they have read and agreed to the organisation's Code of Conduct.</li> </ul> <p><b>Note:</b> Downstream partners are encouraged to develop their own policies, procedures and codes specific to PSEAH, but may adopt the policies of their upstream partner if appropriate.</p>
2. Reporting mechanism and investigation procedures	<ul style="list-style-type: none"> <li>The organisation can receive and manage incident reports safely and confidentially in accordance with Australian and/or local law.</li> <li>Reporting mechanisms are accessible to all stakeholders including children.</li> <li>The organisation must report incidents and investigation outcomes to DFAT.</li> </ul>	<ul style="list-style-type: none"> <li>The organisation has a well-publicised, accessible (including to children), confidential and safe mechanisms for reporting SEAH concerns or incidents which includes protections from retaliation.</li> <li>The organisation has documented procedures for managing SEAH incidents that include trauma-informed responses, procedural fairness, transparent and timely investigation processes, privacy protections and support for victim-survivors</li> </ul>



		<p>(including children if the victim-survivor is a child), and appropriate disciplinary actions if the incident involves their personnel.</p> <ul style="list-style-type: none"> <li>• The organisation ensures children, families and communities are informed about expected behaviours, reporting mechanisms and investigation processes in accessible and culturally appropriate ways. Reporting mechanisms are accessible to all stakeholders including children.</li> <li>• The organisation must report incidents and investigation outcomes to DFAT.</li> </ul>
3. Risk management processes	<ul style="list-style-type: none"> <li>• The organisation undertakes a SEAH risk assessment including mitigation actions tailored to the activities and the context, this is reviewed at least annually and revised as needed.</li> </ul>	<ul style="list-style-type: none"> <li>• The organisation undertakes SEAH risk assessment including mitigation actions tailored to the activities and the context, that is reviewed at least annually and revised as needed.</li> <li>• The organisation must provide documented evidence that senior management and executive boards have visibility of SEAH risk management.</li> <li>• The organisation has documented evidence of its expectations for downstream partners and how those partners will manage SEAH risk.</li> </ul>
4. Training	<ul style="list-style-type: none"> <li>• The organisation provides basic PSEAH training to all relevant personnel advising personnel of rights, obligations and responsibilities. Personnel are required to complete the training annually</li> </ul>	<ul style="list-style-type: none"> <li>• As for Essential Standards, but to a comprehensive level in keeping with the expected high level of risk. See DFAT policy for more details</li> </ul>
5. Recruitment and screening processes	<ul style="list-style-type: none"> <li>• The organisation conducts recruitment and integrity screening for all personnel (including child safe if applicable). Screening should include reference checks, recent police checks, Working with Children or Vulnerable</li> </ul>	<ul style="list-style-type: none"> <li>• The organisation conducts recruitment and integrity screening for all personnel (including child safe if applicable). Screening should include reference checks, recent police checks, Working with Children or Vulnerable</li> </ul>

	<p>People checks, or locally appropriate alternatives or, where these are not feasible, a self-declaration.</p>	<p>People checks, or locally appropriate alternatives or, where these are not feasible, a self-declaration.</p> <ul style="list-style-type: none"> <li>• Additional integrity measures required include targeted messaging and questioning about child and adult safeguarding at all stages of recruitment and onboarding and ongoing monitoring of staff behaviour and adherence to child protection and PSEAH policies and procedures.</li> </ul>
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## Document Control Information

Protection from Sexual Exploitation, Abuse and Harassment Policy	
<b>Owner</b>	Director of Risk, Governance and Business Optimisation
<b>Master Copy</b>	Risk & Governance Team
<b>Document Type</b>	<b>Approval required</b>
<input type="checkbox"/> Governance, Substantive Operational/ Organisation Policies	Board
<input checked="" type="checkbox"/> <b>Operational/ Organisation Policies</b>	<b>Executive</b>
<input type="checkbox"/> Departmental Policies	Department Director
<input type="checkbox"/> Procedure	Department Director
<input type="checkbox"/> Substantive Procedure/ Procedure that impacts whole organisation	Executive
<input type="checkbox"/> Other TAI Documents: work instructions, forms, guidelines, manuals	Department Director
<input type="checkbox"/> Other substantive TAI Document	Departmental Director, Executive and Board
<b>Date created</b>	29/10/2018
<b>Date last reviewed</b>	28/05/2025
<b>Date Approved</b>	22/07/2025
<b>Date next Review</b>	28/05/2028

Date	Version	Revision Description	Reviewed / Updated by
29/10/2018	1	Created	Grants Administration and Strategic Initiatives Coordinator
30/10/2019	2	Updated	Policy QA Coordinator; Associate Director Strategic Relations; Human Resources Manager; International Program Coordinator (Safeguarding Officer)
27/09/2022	3	minor update to reflect current governance and leadership practice (review date not changed, full review still required)	Compliance and Risk Manager
05/06/2023	4	Reviewed and updated	Safeguarding Committee (led by Compliance and Risk Manager, IP Manager – Safeguarding Advisor)
28/05/2025	5	Reviewed and updated to align with new DFAT policy	Risk and Governance Coordinator

17/9/2025	6	Reviewed and updated to align with published DFAT policy	Risk and Governance Coordinator
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