

# Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy

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## Introduction

ChildFund Australia's (ChildFund) People operate in development contexts in a position of trust. ChildFund recognises the serious obligation it holds to do everything possible to respect and protect the children and adults with whom we work. Sexual exploitation or abuse of the very children we aim to protect, or vulnerable adults in communities, are among the most grievous ways that ChildFund can fail in its mission.

The Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy sets out the expectations, systems and processes aimed at preventing sexual exploitation of people we work, with such as program participants, vulnerable adults and community members, as well as the actions that will ensue if incidents of Sexual Exploitation, Abuse or Harassment (SEAH) are identified.

## Policy Statement

ChildFund categorically prohibits, and has zero tolerance for, any actions by its People that constitute Sexual Exploitation, Abuse or Harassment (SEAH). ChildFund's staff and representatives have a strict obligation to take all possible steps to strengthen protection, prevent sexual exploitation and abuse, and to promote the rights of children and other community members with whom we work.

If a ChildFund Person acts in a way that is sexually exploitative or abusive, immediate steps will be taken to protect and support those affected, and to impose disciplinary action as outlined in this Policy and the related Procedures. Childfund has zero tolerance for inaction to report and respond to risks or incidents of SEAH.

Action may include referral to law enforcement agencies, while considering risks to those who have been affected and commitment to a survivor-led approach. The Procedures outline the approach staff should follow to prevent, report and respond to risks and incidents of SEAH.

This Policy should be read in conjunction with the ChildFund *Child Safeguarding Policy* and related Procedure.

## Scope

The protections outlined in this policy apply to adults in communities we engage through our programs and services, as well as others outside the organisation who may come into contact with ChildFund and our partners' activities.

For commitments related to the protection of children and young people under the age of 18, refer to the Child Safeguarding Policy.

For commitments related to issues occurring within ChildFund or partner workplaces (e.g. harassment or abuse between staff), refer to the Organisational Inclusion Policy. The commitments and behaviour standards outlined in this Policy apply to all ChildFund staff representatives as defined below and meaning all those engaged with ChildFund's work, including employees, interns, volunteers, Board members, contractors, consultants, partners, suppliers, visitors to programs and service providers.

**ChildFund's staff and representatives** refers to all those engaged with ChildFund's work including employees, interns, volunteers, Board members, contractors, consultants, partners, suppliers, visitors to programs and service providers.

**Staff** refers to permanent or contract employees of ChildFund Australia, representative country offices, regional equivalents and ChildFund Sport for Development, including volunteers and interns.

**Partners** refers to groups of people and organisations that ChildFund works with in the delivery of programs and projects.

**People/Person** refers to:

- Board members
- Staff (Australia, representative country offices, regional equivalents and ChildFund Sport for Development, including volunteers and interns)
- Supporters
- Any person representing the organisation at ChildFund Australia's request such as:
  - ChildFund Ambassadors
  - Partner organisations
  - Consultants (both organisations and individuals)
  - Suppliers and Contractors<sup>1</sup>

## Exclusions

None.

## Objectives

This Policy outlines:

- What is defined as SEAH.
- The guiding principles to prevent, report and respond to SEAH.
- ChildFund's approach to preventing SEAH and our commitment to the safety of adults in the communities where we work.
- ChildFund's expectations of our People in relation to PSEAH.
- The reporting of and the consequences in the case of identified policy breaches.
- ChildFund's commitment to respond to concerns with a survivor-led approach and a commitment to 'Do No Harm'.

## Key Definitions

This Policy uses the following descriptions of sexual exploitation, sexual abuse and sexual harassment, which combine international and Australian definitions:

**Sexual abuse** is actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes sexual assault, rape, molestation, and other forms of non-consensual sexual activity (Definition as per Common Approach to Protection from Sexual Exploitation, Abuse and Harassment (CAPSEAH)).

**Sexual exploitation** Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including but not limited to profiting monetarily, socially, or politically

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<sup>1</sup> Applies if working with or contact with program participants or vulnerable adults.

from the sexual exploitation of another. For example, coercing individuals into engaging in sexual activities in exchange for aid, services, employment opportunities, or other benefits (CAPSEAH).

**Sexual harassment** means the unwelcome sexual advance, or an unwelcome request for sexual favours, from one person to another, or the engagement 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 online and offline against beneficiaries, community members, citizens, as well as staff and personnel<sup>2</sup> (from Australian Government Department of Foreign Affairs and Trade, *Prevention of Sexual Exploitation, Abuse and Harassment Policy*, 2019).

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. (Definition as per the Sex Discrimination Act 1984).

**Fraternisation** refers to any relationship occurring while conducting ChildFund business, 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 includes 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. Where there are significant power imbalances at play (based on gender, age, ability, authority, social and economic inequality, etc), particularly in humanitarian and development settings, the potential for exploitative fraternisation is heightened.

**Transactional Sex** is the exchange of money, employment, goods or services for sex or sexual acts, and men and women can be sexually exploited where there are significant power imbalances, even in places where sex work is legal.

After a crisis, people may engage in transactional sex to generate income and meet basic survival needs. They may not identify with the term “sex worker”. For a person purchasing sex in a humanitarian, development and peace (HDP) setting, it is often impossible to distinguish between exploitative and non-exploitative transactional sex. Where there are significant power imbalances at play (based on gender, age, ability, authority, social and economic inequality, etc) the potential for exploitative transactional sex is heightened.

For more definitions, see **Glossary** in the related Procedures.

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<sup>2</sup> SEAH perpetrated against ChildFund staff and personnel is covered in the Organisational Inclusion Policy.

## Policy Principles

The Policy is underpinned by the principles outlined below. The principles reflect Australian and international commitments to address SEAH<sup>3</sup>

### **Principle 1: SEAH is prohibited.**

SEAH is never acceptable. SEAH is an abuse of power, violates the rights of victim-survivors and undermines the integrity and impact of ChildFund and our partner's work. ChildFund works to minimise the risks of SEAH associated with all of our work.

### **Principle 2: Zero tolerance for inaction.**

ChildFund has zero tolerance for inaction to prevent, report or respond to SEAH; and zero tolerance for retaliation against victim-survivors, reporters or whistleblowers. Where a ChildFund person or partner develops concerns or suspicions regarding sexual exploitation, abuse or harassment, they must immediately report such concerns via established reporting mechanisms.

### **Principle 3: PSEAH approaches are victim-survivor centred.**

Action to address SEAH is underpinned by a "Do No Harm" approach prioritising the rights, needs, safety, privacy and wishes of the victim-survivor, while ensuring procedural fairness to all parties. ChildFund will tailor our approach and response based on context and build on and strengthen existing community and national mechanisms where these are already established and trusted within the community and also by the victim-survivor.

Procedural fairness is essential when making decisions that affect the rights or interests of any party involved, including victim-survivors, complainants, reporters, witnesses, whistleblowers, and the subject(s) of concern (alleged perpetrator).

### **Principle 4: PSEAH is a shared responsibility and is embedded within organisational culture.**

ChildFund staff and representatives always 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.

Effective practices to educate, prevent and respond appropriately to SEAH are not cost-neutral and require investment.

### **Principle 5 : PSEAH Approaches promote gender equality, inclusion and diversity and power imbalances are addressed.**

ChildFund staff and representatives are typically in a position of power in relation to program participants. This power imbalance can result in a higher risk of SEAH. Engagement with program participants should be based on an awareness of these power imbalances, promotion of gender equality and social inclusion, and a strong "Do No Harm" focus.

### **Principle 6: Reporting protects and ensures accountability.**

ChildFund reporting mechanisms, responses, investigations and support should be trustworthy, culturally appropriate and accessible. All those involved in an incident or allegation should be

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<sup>3</sup> Chiefly, the Collective Statement of the Members of the Secretary-General's Circle of Leadership on the Prevention of and Response to Sexual Exploitation and Abuse in United Nations Operations; the Tidewater Joint Statement on Combating Sexual Exploitation and Abuse in the Development and Humanitarian Sectors; the Whistler Declaration on Protection from Sexual Exploitation and Abuse in International Assistance; the commitments made by donors at the 2018 United Kingdom Safeguarding Summit and CAPSEAH; DFAT PSEAH Policy

protected from retaliation, have their confidentiality and dignity respected and receive appropriate support. Stronger reporting enhances accountability and transparency.

## Policy in Action

This section outlines our commitments to PSEAH and detailed guidance on how to implement this policy is provided in the PSEAH Procedures.

## Conduct of ChildFund's Staff and Representatives

ChildFund staff and representatives commit to following the Organisational Code of Conduct which sets out core expectations including respectful relationships and non-exploitative behaviour.

ChildFund Staff and Representatives:

- Will treat all participants with respect and not use language or behave towards them in an inappropriate way, harassing, abusing, sexually provocative, demeaning or culturally inappropriate manner.
- Will not exchange money, employment, goods or services, protection, or assistance for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour with participants or communities we work in.
- Will not engage in transactional sex during ChildFund business and travel (including after hours or weekends during work travel) or in communities where ChildFund has programming/projects.
- Non-national staff are prohibited from fraternisation with community members and program participants while engaged in ChildFund business.
- Will create a transparent environment by declaring any pre-existing adult romantic/sexual relationships/marriages between staff members, or with partner staff to Management or HR to prevent any potential perceptions of exploitation.
- Will not participate in or support any form of SEAH activity including, for example, people trafficking, or sexual exploitation material online or offline.
- Will immediately (**within 24 hours**) report any concerns or suspicions regarding possible violations of this Policy via the defined reporting approach within the PSEAH Procedures, the Whistleblower Policy and Procedure or in the case of those under 18 years of age, the Child Safeguarding Policy and Procedures. Failure to report such conduct could lead to disciplinary action.
- Will take all reasonable steps within their role to prevent, oppose and combat all SEAH.
- Will immediately disclose charges, convictions and other outcomes of an offence that relates to Sexual Exploitation, Abuse and Harassment of children or adults, including those that may be acceptable under traditional law that happened prior to employment with ChildFund or during employment/engagement.
- Will participate in PSEAH training to ensure a good understanding of PSEAH and this policy and PSEAH procedures.

## Consequences for ChildFund Staff

Any substantiated violation of these expectations is regarded as a serious breach of policy and will result in disciplinary action which may include termination for our Staff, interns, volunteers, Board members, contractors, and consultants.

Failure to act or respond to reports of SEAH could lead to the cessation of any partnership agreement with our Partners. Criminal behaviour will be reported to law enforcement agencies if it is safe to do so and with the consent of the victim- survivor.

## **Recruitment Screening and Training to Prevent SEAH**

In compliance with applicable laws, ChildFund will prevent known perpetrators of sexual harassment, exploitation and abuse, from being hired or deployed in ChildFund, or elsewhere. ChildFund conducts comprehensive recruitment and integrity screening processes for all personnel and continuous monitoring of staff behaviour and adherence to policies as outlined in the PSEAH Procedures.

All ChildFund staff and representatives will receive information relating to ChildFund Australia's *PSEAH Policy* and *Organisational Code of Conduct*, or the relevant Partner's Policy, as part of the orientation/induction process.

Master PSEAH training is contextualised for each country by the relevant PSEAH Focal Point. Staff training is tailored based on the level of impact or contact with program participants and partners and responsibility in the organisation.

## **Prevention and Risk Management (Organisational and Program level)**

### **Safe Operations**

ChildFund will ensure our Code of Conduct is upheld across the organisation.

Preventing and managing the risk of SEAH is coordinated centrally and is formally examined and mitigated against during the six-monthly formal organisational risk review process.

Country Office Risk Registers document country-level safeguarding risks and any mitigating measures.

All ChildFund staff, representatives and our partners, are responsible for being aware of SEAH risks and how to identify, respond, and report concerns following the PSEAH Procedures.

### **Safe Programming and Activities**

SEAH risk assessment forms part of ChildFund's commitment to safe programming in project and program design. PSEAH risks and mitigation are assessed, documented, and monitored throughout the life of a project/program. This includes the consideration of intersecting vulnerabilities and ensuring we apply a Gender Equality, Disability and Social Inclusion (GEDSI) lens to risk assessments.

### **Working with Partners**

International Directors and Country /Regional Directors are responsible for ensuring that our Partners are aware of ChildFund's expectations regarding this *Policy* and will highlight that any failure on their part to report or take action where SEAH has occurred shall constitute grounds for the termination of any Agreement or partnership with ChildFund. Contracts and Agreements with Partners will reflect this expectation in compliance with our commitment to PSEAH.

Partners' compliance with PSEAH minimum standards will be assessed when Due Diligence is conducted (prior to the Partner Agreement being signed). Where partners do not have compliant policies and procedures and/or a compliant Code of Conduct, ChildFund will provide support to partners to develop these in a reasonable time period established together with the partner.

### **Reporting Incidents, Suspicions and Concerns**

Any ChildFund staff member or representative may receive a report of Sexual Exploitation, Abuse or Harassment. All must know how to respond safely and escalate reports according to the Procedures.

ChildFund encourages reporting and guarantees that no action will be taken against individuals who report incidents in good faith. The *Whistleblower Policy and Procedures* also apply.

Any ChildFund Staff or Representative having reasonable grounds to suspect that SEAH has occurred must report within 24 hours to one of the following:

- Country/ Regional Director,
- PSEAH Focal Point for Country Office or Regional
- Safeguarding Lead (PSEAH Focal Point Australia)
- Email: [reportSEAH@childfund.org.au](mailto:reportSEAH@childfund.org.au)
- [Whistleblowing mechanism](#) (anonymous and confidential online reporting mechanism)

### **Receiving, Responding and Managing Reports**

ChildFund is committed to appropriately responding to and recording reports of SEAH. Our approach is victim/survivor-centred, ensuring dignity, safety and respect for those affected.

Informed consent must be obtained from the victim-survivor or witness before proceeding with any further action.

Where safe to do so, and when in accordance with the wishes of the victim-survivor, alleged SEAH incidents that involve a criminal aspect should be reported through the correct local law enforcement channels. Reporting to law enforcement channels or other agencies should be preceded by a risk assessment to avoid or mitigate unintended harm.

ChildFund will refer victim-survivors of SEAH to external appropriate support services as appropriate. This may include referral to assistance with medical/health treatment, counselling, referral, or legal support. All concerns and reports will be logged in a confidential safeguarding register.

Incidents rated as 'High' will be immediately reported to the Safeguarding Response Committee and the Board will be notified. The low and medium-rated concerns/incidents will be overseen by the Safeguarding Lead (PSEAH Focal Point Australia).

Donors will be informed in line with contractual requirements.

A deidentified summary of reports, incidents and policy breaches will be shared with the Board Program Review Committee and Audit and Risk Committee of the Board through quarterly meetings.

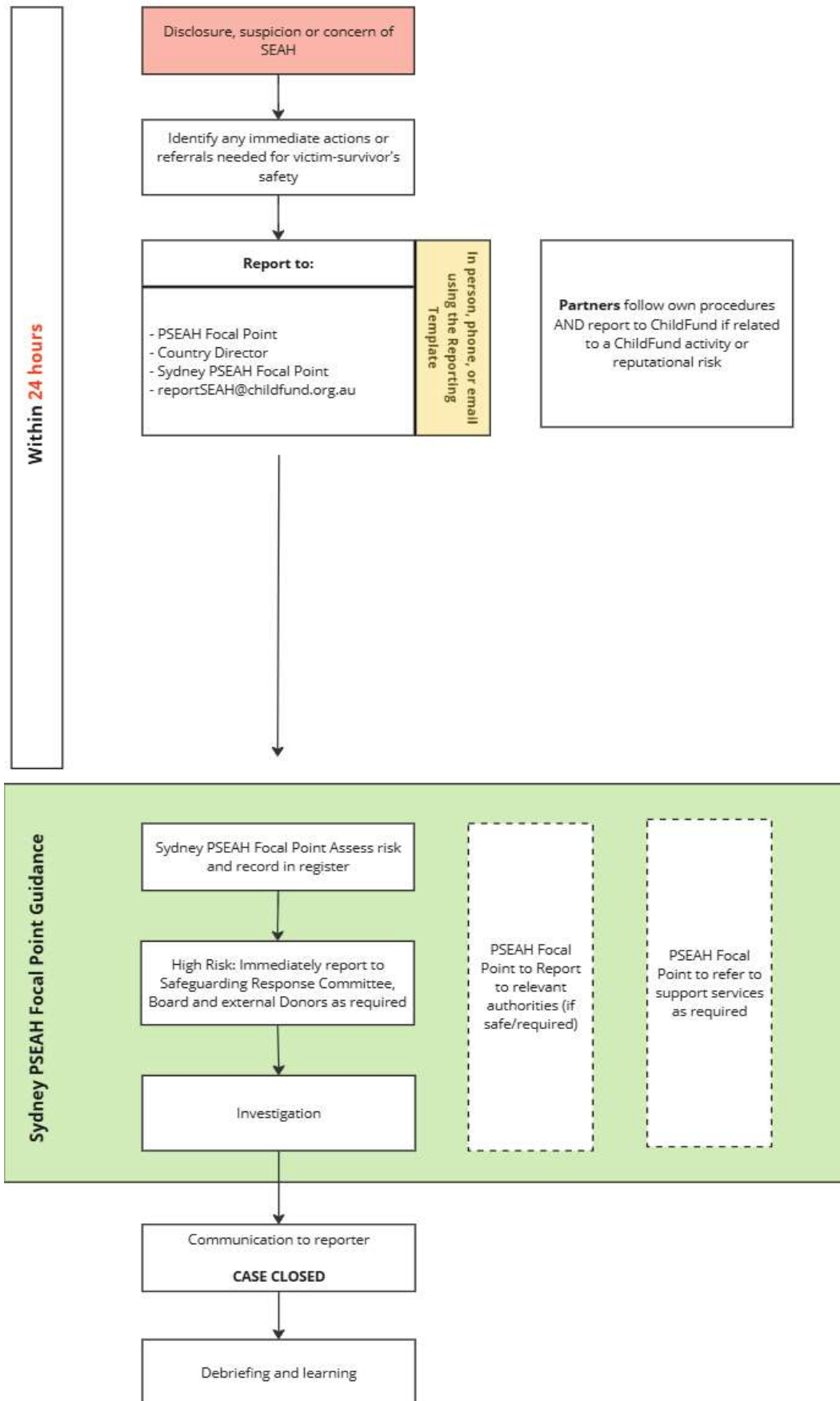
### **Communicating the Policy and Reporting Mechanisms**

All project participants, community members, and partners have the right to know the standards of behaviour expected from ChildFund staff and representatives. These expectations are guided by the *PSEAH Policy* and the *Organisational Code of Conduct*.

ChildFund will provide clear, accessible reporting mechanisms to ensure that staff, community members, partners, and project participants can report any concerns safely and without fear of retaliation.



Table 1 PSEAH Reporting Pathway



This policy will be reviewed every 2 years.

## Related Policies

- Organisational Code of Conduct
- Complaints Policy and Procedure
- Child Safeguarding Policy and Procedures
- Whistleblowing Policy and Procedure
- Recruitment Practices and Conflict of Interest (Employee Handbook)
- Informed Consent Policy
- Information Security and Acceptable Technology Use Policy
- Organisational Inclusion Policy
- Grievance Policy and Procedure
- Privacy Policy
- Conflict of Interest Policy
- Program Handbook Attachment 5.1a Program Partnership Toolkit
- Program Handbook Attachment 5.1b – Partnership Toolkit Annex

## Other related documents

- [DFAT PSEAH Policy and Minimum Standards](#)
- [ACFID Code of Conduct](#)
- [CAPSEAH](#)

## Document Control

Version number	3.0
Date	May 2025
Next Revision Date	May 2027
File Path	Bamboo HR

## Revision History

Version Number	Status	Date	Author	Authorised By	Remarks
1.0	Policy	21/3/2019	Nina von Stebut	Board	New Policy
2.0	Policy	26/7/2019	Nina von Stebut	Board	Review (DFAT)
2.1	Policy	20/08/2021	Nina von Stebut	CEO	Review
2.2	Policy	01/08/2024	Sarah Hunt	CEO	Review
3.0	Policy and Procedures	20/05/2025	Lauren Miles	CEO	Review and addition of PSEAH Procedures