

Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH)

POLICY NAME	PREVENTION OF SEXUAL EXPLOITATION, ABUSE AND HARRASSMENT (PSEAH)
REFERENCE NUMBER	1-SI-PO-2
POLICY OWNER	CEO
POLICY APPROVER	SYMBIOSIS INTERNATIONAL BOARD
RECOMMENDING COMMITTEE	FINANCE AND RISK COMMITTEE
RELATED POLICIES	RIGHTS, PROTECTION AND INCLUSION POLICY CHILD SAFE POLICY
RELATED DOCUMENTS	REPORTING AND INVESTIGATIONS PROCEDURE INCIDENT REPORT FORM TRAINING PROCEDURE SEE ALSO - SCHEDULE 1- CHILD SAFE POLICY
ACFID CODE REFERENCE	1.5
APPROVAL DATE	2 JULY 2022
REVIEW DATE	2 JULY 2023

1 PURPOSE

The purpose of this policy is to advance the safeguarding of those who are vulnerable to sexual exploitation, abuse, or harassment. The policy is written to drive prevention and assist with identifying and responding responsibly to any suspicion, allegation or incident of sexual exploitation, abuse or harassment.

2 SCOPE

This policy applies to all personnel and activities undertaken by Symbiosis International, including its directors, employees, volunteers, official visitors, contractors, donors and partner organisations.

This policy is intended to be read in conjunction with the Child Safe Policy and Procedures which together guide Symbiosis International's approach to safeguarding vulnerable adults and children from sexual abuse, exploitation, and harassment.

Vulnerability exists for many reasons and is based on contextual power imbalance. It can increase due to many reasons such as a person's age, gender, disability, religious identity, socio economic status or ethnicity. The focus of this policy is vulnerability relating to sexual exploitation, abuse and harassment.

3 POLICY STATEMENT

- 3.1 Symbiosis International has a zero-tolerance policy towards Sexual Exploitation, Abuse or Harassment (SEAH).
- 3.2 Symbiosis International recognises that it is their responsibility to ensure that children and adults connected with its operations are not unknowingly or deliberately placed in a situation which makes them vulnerable to SEAH.
- 3.3 Symbiosis International employees and directors must support and maintain an operating environment and workplace culture that promotes PSEAH, starting with adherence to this policy when working with colleagues, volunteers, visitors or partner organisations and with primary stakeholders and communities where Symbiosis International projects are located.
- 3.4 SEAH by persons and organisations listed within the scope of this policy constitutes an act of gross misconduct. Any allegations are grounds for referral to relevant authorities, and substantiated allegations are grounds for the termination of employment, contracts, agreements, or any association with the work of Symbiosis International.
- 3.5 Symbiosis International commits to a non-discriminatory, victim/survivor-centred approach that listens and respects the wishes of the survivor. The organisation is also committed to upholding the privacy of those who may be impacted by this policy and will endeavour to uphold confidentiality, unless a person is at risk of

harming themselves or others or is a child (under 18 years of age).

3.6 Symbiosis International strictly prohibits SEAH behaviours including but not limited to:

3.6.1 Sexual activity with children (those under the age of 18), regardless of the locally recognised age of lawful consent.

3.6.2 Exchange of money, employment, goods, or services for sex, including sexual favours, requests for sexually explicit imagery or other forms of humiliating, degrading or exploitative behaviour.

3.6.4 Sexual relationships between project participants and Symbiosis employees or other representatives (such as visitors or volunteers), which must not occur within two years of a professional relationship ceasing, as the professional relationship would be based on inherently unequal power dynamics. This requirement does not relate to pre-existing relationships with spouses of employees who happen to be project participants and vice versa.

3.6.5 Engaging with commercial sex workers or engaging in prostitution of any form, even if commercial sex work is legalised in the country, while representing Symbiosis International.

3.6.6 Psychological manipulation and coercive behaviours, such as but not limited to, unwanted exposure to sexually explicit material or acts, grooming, stalking or catfishing, occurring in either physical and/or online environments.

3.6.7 Engaging in human trafficking of any kind but particularly where the intent is sexual servitude, slavery or forced marriage.

3.7 SI shows its commitment to PSEAH through the following:

3.7.1 The training of staff, volunteers and visitors to ensure they are aware of SI's requirements and how to lodge a report.

3.7.2 Activity plans will include an assessment of risks to vulnerable people, particularly considering issues of potential power imbalances, environmental factors or social factors that increase vulnerability to SEAH. Project plans shall reference these activity based risks.

3.7.3 Symbiosis International and its partner organisations must meet all of the mandatory requirements and undertake all of the behavioural assessments to support PSEAH outlined in:

- *Symbiosis International Recruitment and Selection Procedure*

The requirements within the procedure are not just for employees but extend the process to volunteers and international visitors.

- 3.7.4 If a partner organisation of Symbiosis International does not have a PSEAH policy or adequate preventative measures assigned in its programs, recruitment and selection procedures, the requirements of this policy and associated procedure will be extended to the Partner Organisation through a Memorandum or Understanding or Partnership Agreement.
- 3.7.5 Undertake a due diligence assessment of partners requesting they disclose any information, historical, current or future concerns which may impact Symbiosis International's ability to fulfil the commitment of this policy.

4 RESPONSIBILITIES

REPORTING

- 4.1 Any person listed within the scope of this policy, has a mandatory obligation to make a report when they know of SEAH occurring, have reasonable suspicion of SEAH occurring, witness non-compliance or disregard for this policy.
- 4.2 Reporting of historical cases, complaints or incidents is encouraged, either by a survivor, perpetrator or witness.
- 4.3 Reporting responsibilities include adherence to legislative requirements. Where an incident occurs, it includes reporting to local law enforcement authorities where laws may have been broken, subject to the wishes and welfare of the survivor, unless the reporting relates to a child/minor where mandatory reporting obligations must be followed.
- 4.4 Reports of SEAH may be made by:
- 4.4.1 Symbiosis International Website utilising the contact details available.
- 4.4.2 For PSEAH Incidents involving children or adults, Symbiosis International staff should follow the process outlined in the Reporting and Investigation procedure.
- 4.4.3 Via Email to the CEO of Symbiosis International: ceo@symbiosis-int.org or addressed to the Symbiosis International Risk Management Officer (Safeguarding).
- Note: In situations where the CEO is the subject of a report or is the reporting party, the matter will be referred to the Symbiosis International Risk Management Officer (Safeguarding) and the Chair of the Symbiosis International Board via email to: chair@symbiosis-int.org
- 4.4.4 Via Phone to the CEO: +61 7 3355 5985 (Monday to Friday 9am - 5pm)
- 4.4.5 A complaint regarding an alleged breach of the ACFID code of conduct can be made to the ACFID code of conduct committee. The complaint should

be marked confidential and addressed to the Committee Chair sent via email to: code@acfid.asn.au

- 4.4.6 Any concerns relating to SEAH in activities funded by the Department of Foreign Affairs and Trade (DFAT) must be reported via the form available at <http://www.dfat.gov.au/pseah> and sent to seah.reports@dfat.gov.au

INVESTIGATIONS

- 4.5 Symbiosis International is committed to responsibly handling allegations, investigations and substantiated incidents of SEAH, taking seriously its role to handle reports of SEAH with integrity and in alignment with the values of the organisation.
- 4.6 The Risk Management Officer (Safeguarding) is responsible for escalating reports of SEAH and undertaking internal investigations in consultation with the CEO (unless the CEO is the subject of the report) with the support of the Symbiosis International Chair. If appropriate, and at their discretion, the Risk Management Officer (Safeguarding) and CEO may ask other relevant persons to assist with these matters. Reports are provided directly to the board when investigating an allegation.
- 4.6.1 If the Risk Management Officer (Safeguarding) is the subject of the report, the CEO shall assume primary responsibility. If both the Risk Management Officer (Safeguarding) and the CEO are the subjects of the report, the SI Chair shall assume primary responsibility.
- 4.7 Any decisions to involve more persons in the investigation must consider the wishes, safety, and confidentiality of the complainant, survivor or witness and act in accordance with Symbiosis International policies.

COMPLIANCE MONITORING AND REVIEW

- 4.8 Symbiosis International will appoint a Prevention of Sexual Exploitation and Abuse focal person. The extent of duties assigned to this person are outlined within the *Guideline for Focal Persons*.
- 4.9 Safeguarding which includes PSEAH of children and adults, must remain a standing agenda item at Symbiosis International Board meetings.
- 4.10 To support compliance with this policy, Symbiosis International will re-state through internal communications the expectations of this policy on an annual basis to its employees and undertake regular training, as well as include it in the induction process for onboarding new employees and directors.

RECORDS MANAGEMENT

- 4.11 All information from reports and investigations will be carefully documented and stored in accordance with this policy and the Symbiosis International Privacy Policy. All incidents will be handled in a way which upholds the value of the

organisation, protection of all parties involved, confidentiality, expedient reporting, truthfulness, fairness and professionalism.

- 4.12 Records of compliance related to recruitment and selection screening and due diligence of partner organisations will also be kept in accordance with this policy and the SI Privacy Policy.

5 DEFINITIONS

TERMS AND DEFINITIONS

Complainant: A person who alleges they have been or is alleged to have been sexually harassed, sexually abused or sexually exploited.

Historical case or incident: A Historical SEAH care or incident is a term used to describe child and/or adult sexual abuse that happened in the past. This could mean months, years or even many decades ago.

Perpetrator: Someone who has committed a crime or a violent or harmful act, in this case SEAH.

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

Sexual abuse: The actual or threatened physical and/or psychological intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

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: Unwanted physical, verbal or non-verbal conduct of a sexual nature that can include indecent remarks or sexual demands.

Survivor: The complainant who has alleged to have been sexually harassed, abused or exploited. Another less-favourable term used is victim.

Vulnerable: A person is deemed vulnerable due to structural, cultural, systemic power dynamics and perceptions about a person, which means they are more susceptible to being taken advantage of. Perceptions and power dynamics may exist around people for many reasons, for example, because of their age, 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.