

Prevention of Sexual Exploitation, Abuse and Harassment Policy

1. Definitions

In this policy the following terms carry the meanings described:

Bribery: The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, facilitation payments, rewards or other advantages (Source: Transparency International Anti-Corruption Glossary).

Child Safeguarding: Actions, policies and procedures that create and maintain protective environments for children to protect them from exploitation and abuse of all kinds (adapted from DFAT Child Protection Policy).

Contact with Children: Working on an activity or in a position that involves or may involve contact with children, either under the position description or due to the nature of the work environment (see also Working with children definition)

Corruption: The abuse of entrusted power for private gain (source: Transparency International Anti-Corruption Glossary)

Development and humanitarian initiatives: Activities undertaken in order to reduce poverty and address global justice issues. In the non-government organisation sector, this may occur through a range of engagements that includes community projects, humanitarian response and emergency management, community education, advocacy, volunteer sending, provision of technical and professional services and resources, environmental protection and restoration, and promotion and protection of human rights.

Dignity: The feeling of having decision-making power, freedom and autonomy over life choices, together with the feeling of self-worth and self-confidence, and feeling that one has the respect of others (Safety with dignity, ActionAid 2009, based on Protection: an ALNAP Guide for Humanitarian Agencies, Slim and Bronwick 2005).

Disability: People with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others (United National Convention on the Rights of People with a Disability).

Gender: Socially constructed roles and relationships between men and women which affect their ability and incentive to participate in development activities and lead to different project impacts for women and men (Guide to Gender and Development, AusAID, 2007).

Gender equity: Fairness in access to resources and in the distribution of benefits from development, according to the different needs of women, men, girls and boys (Australian Government, 2007).

Good practice: A technique, methodology or approach that, through experience and research, has proven to work well reliably, produce desirable results and can be recommended.

Governance: The way in which an organisation is run, including who makes decisions and how they are made (ACNC).

Humanitarian response: Action taken with the objective of saving lives, alleviating suffering and maintaining human dignity during and after human-induced crises and natural disasters, as well as action to prevent and prepare for them (Core Humanitarian Standard).

Local actors: In-country NGOs, CSOs, Disabled Persons Organisations and other entities involved in the implementation of development and humanitarian initiatives.

Local people: The women and men, boys and girls who are participants in, and directly affected by, development and humanitarian initiatives in the geographical area in which the initiative is undertaken. May also be known as beneficiaries or primary stakeholders.

Marginalised: A person or group who is isolated, pushed to the edge, treated or considered unimportant, insignificant and powerless.

Members: Current formal Members of ACFID and signatories to the Code of Conduct

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 intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Source: the UN Secretary General's Bulletin on protection from sexual exploitation and 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. Source: the UN Secretary General's Bulletin on protection from sexual exploitation and abuse.

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

Staff: People employed by Foresight or who are approved as Foresight volunteers.

Volunteer: A person who willingly gives their time for the common good and without financial gain. Volunteering includes formal volunteering that takes place within organisations (including institutions and agencies) in a structured way, and informal volunteering, acts that take place outside the context of a formal organisation (Volunteering Australia).

Working with Children: Working with children means being engaged in an activity with a child where the contact would reasonably be expected as a normal part of the activity and the contact is not incidental to the activity. Working includes volunteering or other unpaid works. (see also Contact with children definition)

2. Scope

Foresight delivers comprehensive, evidence-based, high quality eye health care in Australia and partner countries. Foresight does not tolerate sexual exploitation, abuse or harassment of any kind. Sexual exploitation, abuse or harassment by or towards any Board Director, staff member, volunteer, contractor, supplier, customer or patient will not be tolerated under any circumstances.

It is the expectation that Foresight representatives observe the highest possible standards of behaviour, ethics and integrity as a condition of their engagement with the organisation. The Foresight Board of Directors is committed to providing strong leadership and a culture where sexual exploitation, abuse and harassment is not tolerated.

Foresight takes a survivor centred approach and plays an active role in preventing sexual exploitation, abuse and harassment in all business activities. This policy outlines the practices in place to prevent sexual exploitation, abuse and harassment, enhance accountability and provide support for those affected. A copy of this policy is provided to personnel upon engagement with Foresight and revised versions when the policy is updated.

The Prevention of Sexual Exploitation, Abuse and Harassment Policy (PSEAH Policy) does not replace Foresight's Child Protection Policy. In addition to the requirement of adhering to this policy, Foresight representatives are required to abide by the ACFID Code of Conduct and DFAT's Prevention of Sexual Exploitation, Abuse and Harassment Policy.

This policy applies to Foresight Board Directors, staff, volunteers, project participants and project partners.

3. Commitment

In implementing this PSEAH Policy, Foresight makes the following commitments:

- Having a zero-tolerance approach to sexual exploitation, abuse and harassment
- Creating a working environment which is free from sexual exploitation, abuse and harassment and where Foresight personnel are treated with dignity, courtesy and respect
- Implementing training and awareness raising strategies to ensure that all Foresight representatives are aware of internal and external reporting strategies
- Encouraging the reporting of behaviour that is in breach of this PSEAH Policy
- Having a risk based approach to the prevention of sexual exploitation, abuse and harassment and ensuring the protection of Foresight personnel at all times
- Treating all known and suspected reports of sexual exploitation, abuse and harassment in a sensitive, timely, respectful and confidential manner
- Guaranteeing protection from any victimisation or retaliation
- Encouraging the reporting of behaviour that breaches this PSEAH Policy

Promoting appropriate standards of behaviour, always.

4. Guiding Principles

Foresight activities may involve direct work, indirect work or regular contact with vulnerable communities.

The guiding principles in the development of this policy include:

- Zero tolerance of sexual exploitation, abuse and harassment in any form
- Recognition of all individual's best interests
- Responsibility for the protection of sexual exploitation, abuse and harassment
- Operating and procedural fairness
- Implementing risk management procedures
- Ensuring all involved with Foresight are aware of this policy and guidelines.

As such the Foresight PSEAH Policy is in place to:

- Provide a practical guide to the protection of sexual exploitation, abuse and harassment
- Provide a risk management strategy to prevent sexual exploitation, abuse and harassment

- Protect Foresight employees and volunteers from unfair processes
- Provide a clear guide on what to do if sexual exploitation, abuse or harassment is suspected.

5. Risk Based Approach to the Prevention of Sexual Exploitation, Abuse and Harassment

Foresight maintains an organisational risk register, reviewed by the Board of Directors bi- annually.

Risk Assessments are undertaken for all projects and are reviewed by the Finance, Risk, Audit and Compliance Committee (FRACC) at the commencement of projects. Capacity Assessments undertaken prior to the commencement of projects examine practices to ensure the protection of children and prevention of sexual exploitation, abuse, and harassment.

The risk of sexual exploitation, abuse and harassment is monitored throughout the project, with strategies including: monitoring via trip reports; and review at monthly operations meetings.

All involved with Foresight are provided with a copy of this policy and the contents of the policy, including individual's responsibilities, code of conduct and reporting processes, are shared as part of Good Development Practices workshops.

6. Code of Conduct

Foresight has a Code of Conduct Policy that must be adhered to.

The Code of Conduct Policy outline the expected behaviours that Board Directors, staff, volunteers and partner organisations are required to display at all times. Failure to comply with the Code of Conduct Policy may result in disciplinary action, restriction of duties, termination of services, legal action or criminal investigation.

7. Responsibilities

Foresight is responsible for:

- Maintaining and sharing this policy with all personnel
- Having clear and internal reporting mechanisms and procedures for reporting sexual exploitation, abuse or harassment
- Ensuring all personnel are aware of how to report an incident or suspected incident of sexual exploitation, abuse or harassment

- Investigating reports of sexual exploitation, abuse or harassment confidentially with feedback to the Board of Directors
- Undertaking risk assessments of all projects and at an organisational level with consideration for the prevention of sexual exploitation, abuse and harassment
- Providing training on the prevention of sexual exploitation, abuse and harassment for personnel
- Implementing robust recruitment and screening practices for Board Directors, staff, volunteers and project participants
- Modelling appropriate behaviour and monitoring the working environment and activities to ensure appropriate standards of behaviour are observed at all times.

Foresight personnel are responsible for:

- Following the standards of behaviour outlined in this policy
- Following the standards of behaviour outlined in the Foresight Code of Conduct Policy
- Being familiar with and abiding by the ACFID Code of Conduct, in particular Commitment 1.5
- Treating everyone with dignity, courtesy and respect
- Complying with this PSEAH Policy by ensuring they do not perpetrate sexual abuse or harassment
- Keeping any complaints they become aware of confidential.

8. PSEAH Officer

The Foresight PSEAH Officer is the General Manager. The General Manager holds responsibility for promoting the prevention of sexual exploitation, abuse and harassment, coordinating training, monitoring and compliance and answering any queries.

The Foresight Board of Directors supports the General Manager in undertaking training to remain abreast of prevention of sexual exploitation, abuse and harassment information on an ongoing basis.

9. Recruitment Practices

All those involved with Foresight including Board Directors, staff, local stakeholders and project participants are required to provide a National Police Clearance and are checked against the DFAT Consolidated list, Attorney General's Department List of Terrorist Organisations, World Bank Listing of ineligible firms and individuals and Asian Development Bank Sanctions List.

All are required to read and understand Foresight's suite of policies and procedures, including the Code of Conduct Policy and Child Protection Policy.

Job descriptions are in place for all staff, and specific volunteer appointments. Face-to-face interviews and referee checks are always conducted. A clause regarding expectations for the prevention of sexual exploitation, abuse and harassment is included in staff contracts.

10. Training of Personnel

All Foresight Board Directors, staff and project partners receive a copy of this PSEAH Policy upon engagement with Foresight.

The local stakeholders are provided with information about the prevention of sexual exploitation, abuse and harassment as well. The General Manager delivers workshops on cross cutting issues, including sexual exploitation, abuse and harassment, to all project participants. These workshops are delivered upon project commencement and on an annual basis thereafter.

11. Reporting Processes

All concerns or allegations of sexual exploitation, abuse and harassment must be reported immediately. Foresight takes all reports and concerns seriously and acts on them immediately. In investigating concerns or allegations of sexual exploitation, abuse and harassment, Foresight ensures that principles of natural justice will prevail.

The process to report an allegation of suspected or actual sexual exploitation, abuse or harassment is:

Who can make a report?	Foresight personnel and representatives. Individuals
What should be reported?	Any allegation from an individual or Foresight representative regarding sexual exploitation, abuse or harassment. Any suspected breaches of Foresight’s PSEAH Policy, DFAT PSEAH Policy, the ACFID Code of Conduct, Commitment 1.5. Any observation of concerning behaviour exhibited by Foresight representatives that may breach Foresight’s PSEAH Policy, DFAT PSEAH Policy, Conduct or the ACFID Code of Conduct commitment 1.5.
When should it be reported?	Reports and/or concerns are to be made immediately and within a 24 hour period of becoming aware of an alleged incident. Mandatory reporting of any alleged PSEAH non-compliance is required within 4 working days.

<p>Who should it be reported to?</p>	<p>Foresight General Manager – 02/8021 3632 or email foresight@foresight.org.au</p> <p>Foresight Chairman – 02/8021 3632 or email at foresight@foresight.org.au</p> <p>The General Manager will then report the incident to DFAT via the DFAT Sexual Exploitation, Abuse and Harassment Incident Notification Form and emailed to seah.reports@dfat.gov.au</p>
<p>How should the report be made?</p>	<p>Reports can be made verbally initially and are then required in writing.</p> <p>Reports of abuse are to be made using the Foresight Reporting Form for suspected cases of sexual exploitation, abuse and harassment.</p>
<p>What are the next steps?</p>	<p>Subject to the wishes and welfare of the complainant/ survivor, Foresight will conduct a preliminary assessment of the situation and determine whether based on the information at hand there has been a criminal act or a breach of code of conduct:</p> <p>If a crime has been committed, it will be reported to the appropriate law enforcements authorities and consideration given to whether any administrative investigation will be postponed. Any reporting must be done with consideration of the safety and wishes of the victims/survivors.</p> <p>If there has been a breach of the code of conduct, then a formal internal investigation process will be undertaken by Foresight Board of Directors:</p> <ul style="list-style-type: none"> - Gather and study background material and documentary evidence - Interview complainant - Interview victims if different from above - Interview witnesses if they exist - Interview subject of complaint

12. Review

The Foresight PSEAH Policy is reviewed on an annual basis.



14th September 2022

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(Signature)

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(Date)

Kevin Gardner

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(Print name)