

# PREVENTION OF SEXUAL EXPLOITATION, ABUSE AND HARASSMENT POLICY



## 1. Intent

Sight For All delivers comprehensive, evidence-based, high quality eye health care in Australia and partner countries.

Sight For All has a zero tolerance approach and does not tolerate sexual exploitation, abuse or harassment in all aspects of our work and for inaction to prevent, report or respond to sexual exploitation, abuse and harassment. Sight For All takes our duty of care very seriously, including responding to reports and complaints and always aims to provide the safest possible working environment and projects.

Sexual exploitation, abuse or harassment by or towards any Board Director, staff member, Fellow, project participant, Visionary, volunteer, contractor (and their personnel), project partner representatives, consultant, supplier, customer or patient will not be tolerated under any circumstances.

The purpose of this policy is to ensure protection of people, including children and young persons, at risk adults and project beneficiaries from any harm caused through their contact with Sight For All.

It is the expectation that Sight For All representatives observe the highest possible standards of behaviour, ethics and integrity as a condition of their engagement with the organisation.

The Sight For All Board of Directors is committed to providing strong leadership and a culture where sexual exploitation, abuse and harassment is not tolerated.

Sight For All has a duty of care, 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.

Adherence to this policy is a mandatory requirement for all Sight For All personnel and representatives. It also applies to any downstream partners.

Sight For All implements risk management strategies, undertakes stringent recruitment practices and adheres to local and international legislative requirements.

## 2. Scope

This policy applies to Sight For All Board Directors, staff, Visionaries, volunteers, Fellows, consultants, contractors (and their personnel), project participants and project partners at all times, both within Australia and in partner countries. Sight For All acknowledges that Fellows, project participants and project partners are public servants employed by Government. Sight For All further acknowledges that laws differ across countries. At a minimum, Sight For All will comply with the laws in Australia (including extra-territorial laws) and the laws in countries where we operate.

A copy of this policy is provided to personnel upon engagement with Sight For All and revised versions when the policy is updated.

This Prevention of Sexual Exploitation, Abuse and Harassment Policy (PSEAH Policy) does not replace Sight For All's Child and Young Person Protection Policy.

In addition to the requirement of adhering to this policy, Sight For All representatives are required to abide by the Sight For All Code of Conduct Policy, Sight For All Vulnerable Persons Code of Conduct, ACFID Code of Conduct and DFAT's Prevention of Sexual Exploitation, Abuse and Harassment Policy 2025.

### 3. Compliance

Sight For All has this PSEAH Policy in place to ensure good development practices that are aligned with the organisation's principals and international human rights conventions. It is also a requirement by the Australian Government to have a PSEAH Policy in place that is clearly communicated and meets the Seven Minimum Standards as outlined in the DFAT Protection from Sexual Exploitation, Abuse and Harassment Policy. Additionally, this PSEAH Policy is required to comply with the ACFID Code of Conduct Compliance Indicator 1.5.1 and Sight For All's Grant Agreement with the Australian Government's Australian NGO Cooperation Program (ANCP). This Sight For All PSEAH Policy is reviewed on an annual basis.

As Sight For All undertakes projects in low-middle income countries, has personnel who interact with women, who may have a disability or be vulnerable, and may work in high-risk settings, the risk of sexual exploitation, abuse or harassment occurring is considered high. As such Sight For All meets DFAT's sexual exploitation, abuse and harassment Comprehensive Standards. These Comprehensive Standards include:

- Having this comprehensive PSEAH Policy that, among other information, includes the prohibition of transactional sex
- Acknowledgement by all personnel that the Sight For All Code of Conduct has been read and agreed to.

### 4. Commitment

**In implementing this PSEAH Policy, Sight For All makes the following commitments:**

- Having a zero-tolerance approach to sexual exploitation, abuse and harassment
- Creating a working environment that is free from sexual exploitation, abuse and harassment and where Sight For All personnel are treated with dignity, courtesy and respect
- Implementing training and awareness raising to ensure that all Sight For All representatives are aware of internal and external reporting requirements
- Prohibiting transactional sex for all personnel including downstream partners in high-risk environments, including development and peacekeeping settings
- 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 always ensuring the protection of Sight For All personnel and project beneficiaries
- Treating all known and suspected reports of sexual exploitation, abuse and harassment in a sensitive, timely, respectful and confidential manner, ensuring reports are made within 24 hours
- Respecting the wishes of the victim/survivor in all situations
- Guaranteeing protection from any victimisation or retaliation
- Encouraging the reporting of behaviour that breaches this PSEAH Policy
- Promoting appropriate standards of behaviour, always.

### 5. Guiding Principles

Sight For All activities may involve direct work, indirect work or regular contact with vulnerable communities. The guiding principles in the development of this policy are as per those outlined in the DFAT Protection from Sexual Exploitation, Abuse and Harassment Policy:

- PRINCIPLE 1 - Zero tolerance for sexual exploitation, abuse and harassment  
Zero tolerance for sexual exploitation, abuse and harassment and zero tolerance for inaction preventing, reporting or responding to sexual exploitation, abuse and harassment.
- PRINCIPLE 2 - Take a victim-survivor-centred approach to sexual exploitation, abuse and harassment prevention and response  
Enabling a 'do no harm' approach that
  - treats victims/survivors with respect
  - involves the victim/survivor in decision making

- provides the victim/survivor with comprehensive information
- protects privacy and confidentiality
- does not discriminate based on gender, age, race/ethnicity, ability, sexual orientation
- considers the need for counselling and health services to assist the victim/survivor with recovery.
- PRINCIPLE 3 - Promote inclusion and equity and recognise diversity  
Ensuring all actions and decisions are inclusive and equitable, recognising that people may be at an increased risk of sexual exploitation, abuse and harassment due to their gender equity, age, sexual orientation, ethnicity, socio-economic status, disability, displacement or other factors. Barriers to protection, participation, reporting and support such as safety, discrimination, language and accessibility are addressed.
- PRINCIPLE 4 – Prioritise prevention  
Being proactive in minimising the risk of sexual exploitation, abuse and harassment and creating safe environments including physically and online. Prevention of sexual exploitation, abuse and harassment and promoting safety is embedded in policies, projects, training and daily operations.
- PRINCIPLE 5 – Adopt an empowering and participatory approach  
Such an approach builds trust, increases relevance and promotes shared responsibility for safeguarding. Undertaking consultation with stakeholders, particularly of women and girls, in developing effective and culturally appropriate measures to prevent sexual exploitation, abuse and harassment.
- PRINCIPLE 6 – Reporting Incidents is mandatory  
Reporting mandatory and immediate concerns of sexual exploitation, abuse and harassment to DFAT business. Reporting and responses are accessible, clear and confidential, protecting those who report and addressing concerns in a timely and appropriate manner.
- PRINCIPLE 7 – Embed safeguarding into organisational culture and leadership  
Embedding the prevention of sexual exploitation, abuse and harassment into governance, leadership and organisational culture, with a commitment from the leadership, investment in resources and ongoing improvement of policies and practices.

As such the Sight For All PSEAH Policy is in place to:

- Provide a practical guide for the protection against sexual exploitation, abuse and harassment
- Provide a risk management strategy to prevent sexual exploitation, abuse and harassment
- Protect Sight For All employees and volunteers from unfair processes
- Provide a clear guide on what to do if sexual exploitation, abuse or harassment is suspected.

## 6. Responsibilities

Sight For All is responsible for:

- Maintaining and sharing this Policy with all personnel
- Ensuring all personnel adhere to the principles of this policy and the DFAT PSEAH Policy
- Complying with Australian law and appropriate legislation including the Sex Discrimination Act 1984, Australian Human Rights Commission Act 1986, Privacy Act 1988 and Fair Work Act 2009
- Taking a risk-based approach in applying prevention of sexual exploitation, abuse and harassment standards
- Abiding by local legislation when undertaking activities in partner countries
- Having clear and confidential internal reporting mechanisms and procedures for mandatory and immediate reporting of sexual exploitation, abuse or harassment for reports to be made within a 24 hour period
- Ensuring all personnel are aware of how to report an incident or suspected incident of sexual exploitation, abuse or harassment, including how to access reporting forms and alternative accessible reporting options

- Investigating reports of sexual exploitation, abuse or harassment confidentially with feedback to the Board of Directors
- Designing and undertaking projects to protect people from harm that may arise when coming into contact with Sight For All
- Undertaking risk assessments for 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, Visionaries, Fellows, volunteers, contractors, consultants and project participants
- Modelling appropriate behaviour and monitoring the working environment and activities to ensure appropriate standards of behaviour are observed at all times
- Monitoring and evaluating compliance with this policy through periodic internal audits, anonymous staff and partner surveys and third-party reviews where appropriate.

Sight For All personnel are responsible for:

- Following the standards of behaviour outlined in this policy
- Following the standards of behaviour outlined in the Sight For All Code of Conduct Policy and Vulnerable Persons Code of Conduct
- Following the standards of behaviour and reporting requirements as outlined in the DFAT Protection from Sexual Exploitation, Abuse and Harassment Policy (September 2025)
- 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
- Reporting any incidents or suspected incidents in accordance with the reporting requirements outlined in this Policy
- Not exchanging money, employment, goods or services for sexual activity
- Not engaging in any sexual relationships with project beneficiaries.

## 7. Transactional Sex and Fraternisation

Transactional sex is the exchange of money, employment, goods or services for sex or sexual acts. Fraternisation is any intimate or social relationship occurring in the course of conducting business. Examples may be preferential treatment for one individual over another, or an improper use of an individual's position.

Sight For All prohibits transactional sex for all personnel, including staff, Visionaries, contractors, project participants and downstream partners in all high-risk environments.

## 8. Recruitment Practices

Sight For All aims to recruit the safest and most suitable people to undertake positions of Board Directors, staff, contractors, Visionaries, volunteers, Fellows and project participants. Sight For All will not knowingly engage, either directly or indirectly, an individual who poses an unacceptable risk to others. By implementing robust recruitment and screening practices, Sight For All can create and maintain a safe environment and prevent opportunities for sexual exploitation, abuse and harassment wherever possible.

**Table A** below outlines the specific requirements for recruitment and screening of Board Directors, staff, Visionaries, volunteers, consultants and contractors. The table also outlines the requirements for Fellows, project participants and partners.

Recruitment practices include the provision of national police checks, signing Sight For All's Code of Conduct Policy, Vulnerable Persons Code of Conduct, Child and Young Person Protection Policy, Prevention of Sexual Exploitation, Abuse and Harassment Policy, provision of a CV and checking against sanctions listings.

| Position                          | Requirement                                                   |                                                   |                                    |                                                        |                                            |                                 |                    |           |                |                                 |                                               |                              |                  |                                                |
|-----------------------------------|---------------------------------------------------------------|---------------------------------------------------|------------------------------------|--------------------------------------------------------|--------------------------------------------|---------------------------------|--------------------|-----------|----------------|---------------------------------|-----------------------------------------------|------------------------------|------------------|------------------------------------------------|
|                                   | Criminal Record Check on engagement and updated every 2 years | Working with Children Check updated every 5 years | Sign Sight For All Code of Conduct | Sign Sight For All Vulnerable Person's Code of Conduct | Send Sight For All Child Protection Policy | Send Sight For All PSEAH Policy | Provide copy of CV | Interview | Referee Checks | Checked against sanctions lists | Good Development Practice Workshop attendance | Job and Person Specification | Signed Agreement | AHPRA Registration or International Equivalent |
| Board Director                    | ✓                                                             | ✓                                                 | ✓                                  | ✓                                                      | ✓                                          | ✓                               | ✓                  | ✓         | ✓              | ✓                               | ✓                                             | ✓                            | ✓                | ✓                                              |
| Staff Member                      | ✓                                                             | ✓                                                 | ✓                                  | ✓                                                      | ✓                                          | ✓                               | ✓                  | ✓         | ✓              | ✓                               | ✓                                             | ✓                            | ✓                | ✓                                              |
| Visionary                         | ✓                                                             | ✓                                                 | ✓                                  | ✓                                                      | ✓                                          | ✓                               | ✓                  | ✓         | ✓              | ✓                               | ✓                                             | ✓                            | ✓                | ✓                                              |
| In-Country Visionary              | ✓                                                             | ✓                                                 | ✓                                  | ✓                                                      | ✓                                          | ✓                               | ✓                  | ✓         | ✓              | ✓                               | ✓                                             | ✓                            | ✓                | ✓                                              |
| Volunteer                         | ✓                                                             | ✓                                                 | ✓                                  | ✓                                                      | ✓                                          | ✓                               | ✓                  | ✓         | ✓              | ✓                               | ✓                                             | ✓                            | ✓                | ✓                                              |
| Fellow/Project Participant        | ✓                                                             | ✓                                                 | ✓                                  | ✓                                                      | ✓                                          | ✓                               | ✓                  | ✓         | ✓              | ✓                               | ✓                                             | ✓                            | ✓                | ✓                                              |
| Project Partner/Hospital Director | ✓                                                             | ✓                                                 | ✓                                  | ✓                                                      | ✓                                          | ✓                               | ✓                  | ✓         | ✓              | ✓                               | ✓                                             | ✓                            | ✓                | ✓                                              |
| Consultant                        | ✓                                                             | ✓                                                 | ✓                                  | ✓                                                      | ✓                                          | ✓                               | ✓                  | ✓         | ✓              | ✓                               | ✓                                             | ✓                            | ✓                | ✓                                              |
| Contractor                        | ✓                                                             | ✓                                                 | ✓                                  | ✓                                                      | ✓                                          | ✓                               | ✓                  | ✓         | ✓              | ✓                               | ✓                                             | ✓                            | ✓                | ✓                                              |
| Supplier                          | ✓                                                             | ✓                                                 | ✓                                  | ✓                                                      | ✓                                          | ✓                               | ✓                  | ✓         | ✓              | ✓                               | ✓                                             | ✓                            | ✓                | ✓                                              |

**Table A**

## Personnel Screening / Criminal Record Checks

As outlined in Sight For All's Criminal Record Check Procedure, it is a requirement of all involved with Sight For All to provide a current criminal record check at their point of engagement with the organisation. Checks are required to be updated every five years. The Criminal Record Check Procedure notes undertaking checks outside of Australia and instances for when statutory declarations may be required.

## Sanctions Lists

As noted in **Table A**, all Board Directors, staff, Visionaries, volunteers, Fellows, project participants, project partners, consultants and contractors are checked against various sanctions lists.

These lists include: 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. These lists are checked at the point of individuals and organisations commencing engagement with Sight For All. The Finance Manager undertakes sanction list checks ahead of every Finance, Risk, Remuneration, Audit and Compliance Committee (FRRACC) meeting.

## Staff Appointments

Sight For All has a small staff team, with staff located in the Adelaide office. Sight For All's Country/Project Officers in Cambodia, Myanmar, Mongolia and Lao are employed through recruitment agencies in-country. All staff employed by Sight For All, whether directly in Adelaide or via agencies in-country, are referee checked and undergo requirements as outlined in **Table A**.

All positions have job and person specifications that includes Sight For All's commitment to ensuring safety of children and vulnerable people, and expectations of employees.

Face to face interviews conducted for employees include behavioural based questions for all appointments. Referee checks of 3 referees including the applicant's most recent manager are conducted. All Sight For All employment contracts include a clause regarding expectations for child and young person protection and the prevention of sexual exploitation, abuse and harassment and sanctions for breaching. Service Agreements for consultants and contractors outline expectations for compliance with Sight For All's PSEAH Policy and Child & Young Person Protection Policy.

## Visionary Appointments

Sight For All in-country projects and online learning programs are supported by Visionaries. Visionaries are primarily Australian based ophthalmologists. Australian ophthalmic Visionaries are, in most cases, at least partially employed within the public hospital system and all are registered with the Australian Health Practitioner Regulation Agency (AHPRA). Public hospitals require medical professionals to have a current Criminal Record Check and Working With Children Check (WWCC), updated every five years. Maintaining AHPRA registration requires evidence of these documents on an annual basis. Sight For All requires copies of criminal record checks and WWCC for all ophthalmic Visionaries.

Optometry Visionaries working with Sight For All are usually employed in private practice and must also have AHPRA registration. Optometry Visionaries must provide Sight For All with a current Criminal Record Check and WWCC in addition to evidence of their current AHPRA registration. Where ophthalmologists, optometrists, orthoptists, ophthalmic nurses or scientists residing outside of Australia volunteer as a Sight For All Visionary, a WWCC in addition to a current Criminal Record Check and a relevant government medical regulatory body certificate are to be provided. Sight For All's Human Resources Policy outlines details for the recruitment of and selection of staff, Visionaries and Board Directors.

## **9. Respecting the wishes of Victims/Survivors**

Sight For All understands that individuals feel safer when reporting concerns or allegations of sexual exploitation, abuse or harassment, if they know their confidentiality will be maintained. Sight For All respects the wishes and welfare of the survivor and will not share or disclose their identity (such as name and details) wherever possible.

In respecting the wishes of survivors wanting to protect their identity, personal information that identifies the individual will only be disclosed when required by law. During investigation and reporting processes, all reasonable efforts will be taken to de-identify the individual. For example: reports to the Board of Directors and recording of information on the Master Register will be de-identified with the individual's name and other personal details not disclosed.

## **10. Training**

All Sight For All Board Directors, staff, Visionaries, volunteers, Fellows, project participants, project partners, consultants and contractors receive a copy and sign their understanding of this PSEAH Policy, the Sight For All Code of Conduct Policy, Sight For All's Vulnerable Persons Code of Conduct and Sight For All's Child and Young Person Protection Policy.

Training in PSEAH is included as part of Good Development Practice Workshops. Attendance at Good Development Practice Workshops is compulsory for Board Directors, staff, Visionaries, volunteers, contractors, Fellows and project participants. The workshops are delivered upon commencement and refresher training is undertaken annually. Good Development Practice Workshops include a comprehensive presentation on PSEAH. Topics covered include responsibilities, reporting processes, assessing risks, mitigation strategies and sanctions. It covers the process for reporting suspected incidents and how to make a complaint to Sight For All or the ACFID Code of Conduct Committee. An assessment must be completed after attendance of Good Development Practice Workshop.

Additional training is identified and coordinated as required. Where possible, Sight For All will also work to strengthen the understanding and capacity of partner safeguarding processes.

## **11. Partners**

This PSEAH Policy is included as an Addendum to all Head Agreements and Project Agreements in place with partner organisations.

The workshop covers the process for reporting suspected incidents and how to make a complaint to Sight For All or the ACFID Code of Conduct Committee.

Partner organisations and relevant Directors/staff/project participants will be monitored to ensure they are not in breach of this policy. Monitoring will be proportionate to the arrangement in place with each partner and the risk of the breach.

### **Non-Government Partners**

Sight For All requires non-government partners to maintain their own PSEAH policies. In instances where partners do not have their own policy, they are required to sign and comply with Sight For All's PSEAH Policy.

## **Government Partners**

Sight For All acknowledges that Fellows, project participants and project partners are public servants employed by Government. Sight For All further acknowledges that the laws and operating contexts for the prevention of sexual exploitation, abuse and harassment differ across countries, and that Sight For All is unable to require government employees be bound by this policy.

Sight For All and Government partners will work together to ensure that standards to prevent sexual exploitation, abuse and harassment are included in partner agreements. This includes reporting arrangements and identification of safeguarding risks. Partner agreements acknowledge the shared responsibility for identifying, reducing and monitoring risks and reporting suspected safeguarding breaches. Actions that cause Sight For All staff to believe that vulnerable people are being exposed to significant risk will result in the termination of the agreement with that partner organisation.

Fellows and project participants attend Good Development Practice Workshops at the commencement of projects and on an annual basis. Project Capacity Assessments and Country Situational Analysis have sections that include review of how the country manages the prevention of sexual exploitation, abuse and harassment.

## **12. Risk Management**

While elimination of sexual exploitation, abuse and harassment is a long-term endeavour, Sight For All is committed to minimising the risks of sexual exploitation, abuse and harassment in all undertakings. Sight For All will carefully manage the organisation and projects to identify, mitigate and reduce risks.

### **Assessing sexual exploitation, abuse and harassment risks**

Sight For All assesses the risk of sexual exploitation, abuse and harassment in activities by asking questions including:

- Is the activity in a low-middle income country or high-risk setting?
- Are there high rates of gender-based violence in the country where the project is occurring?
- Will there be interaction with individuals, especially women, who have a disability, are experiencing poverty or are of an ethnic, indigenous or sexual minority?

These questions are undertaken as part of project capacity assessments.

Sight For All uses DFAT's Protection from Sexual Exploitation, Abuse and Harassment and Child Protection Policies Interim guidance on the updated approach to risk assessments and relevant standards.

### **Project Level Risks**

An initial project risk assessment is conducted as part of the initiation and concept phase. The risk assessment is re-assessed at the project planning and design phase. Project risk assessments cover safeguarding and PSEAH risks and include actions and recommendations to mitigate or remove potential risks. PSEAH risks are discussed as project risk registers are reviewed by Country/Project Officer and the General Manager throughout the project cycle.

### **Organisational Level Risks**

Organisational risks are monitored by FRRACC and the Board of Directors at every meeting. This includes monitoring of PSEAH risks. The General Manager reports any safeguarding issues or concerns to Board Directors as a standing agenda item at each meeting. All new Board Directors and staff attend a Good Development Practice Workshop at the commencement of their engagement.

### **Digital Safeguarding**

Sight For All recognises the importance of safeguarding in digital environments. This includes risks associated with online learning programs, virtual consultations, and remote engagements. Potential risks such as inappropriate online conduct, data privacy breaches, and digital grooming must be identified and mitigated through secure platforms, clear conduct guidelines and training on digital safety.

### 13. Code of Conduct

Sight For All has a Code of Conduct Policy and Vulnerable Persons Code of Conduct that must be adhered to. The Vulnerable Persons Code of Conduct is required to be read, acknowledged and signed at the point of engagement with Sight For All. The Code of Conduct Policy and Vulnerable Persons Code of Conduct outline the expected behaviours that Sight For All representatives are required to always display. The Code of Conduct and Vulnerable Persons Code of Conduct also forbids fraternisation and transactional sex. Failure to comply with the Code of Conduct Policy and Vulnerable Persons Code of Conduct will result in disciplinary action, restriction of duties, termination of services, legal action or criminal investigation.

### 14. PSEAH Officer

The Sight For All 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. Supporting the General Manager and additional points of contact in-country are the Country/Project Officers. The Sight For All 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.

### 15. Reporting Processes

All suspected, alleged or known incidents of sexual exploitation, abuse and harassment require **MANDATORY AND IMMEDIATE** reporting within 24 hours to Sight For All via [secure online form](#).

Where a matter relates to DFAT business, it must also be reported to DFAT within 24 hours in accordance with DFAT reporting requirements. Anyone may make a report directly to DFAT where the matter relates to DFAT business using the DFAT Sexual Exploitation, Abuse and Harassment Incident Notification Form: [seah-incident-notification-form.docx](#)

Sight For All takes all reports and concerns seriously and acts on them immediately. Where concerns or allegations of sexual exploitation, abuse or harassment have a criminal aspect, Sight For All will make a report to the local law enforcement agency, where it is safe to do so and giving regard to the wishes of the victim/survivor.

Sight For All's Incident Investigation and Reporting Policy further outlines the process for reporting concerns or allegations of sexual exploitation, abuse and harassment. A flowchart included as Addendum A in this Policy outlines the internal reporting process and the requirement to assess whether DFAT reporting is required.

Sight For All will also report allegations, actual or reasonable suspicion to the insurance company.

In investigating concerns or allegations of sexual exploitation, abuse and harassment, Sight For All ensures that principles of natural justice will prevail. As outlined in Sight For All's Whistleblower Policy, concerns and allegations will be treated in the strictest of confidence, providing confidentiality of the reporter, the identity of the person who is the subject of the disclosure and details of the disclosure itself. Individuals making reports will not endure any sanctions from Sight For All, provided that reports are made in good faith, are based on reasonable grounds and conform to the requirements of this policy.

Sight For All ensures that any individual who self-reports (i.e. reports an incident that happened to them) will be provided with timely assistance and be treated with confidentiality and respect.

**Reports of sexual misconduct for children under the age of 18 years are to be made as per Sight For All's Child and Young Person Protection Policy.**

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

|                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <b>Who can make a report?</b>         | Sight For All Board Director, staff member, Visionary, volunteer, Fellow, project participant, project partner, consultant or contractor.<br>Any member of the general public, including adults, children, young people, carers and guardians.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>What should be reported?</b>       | Report any: <ul style="list-style-type: none"> <li>Concerning behaviour that may breach Sight For All's safeguarding policies, Codes of Conduct, or related standards.</li> <li>Allegation, disclosure or suspicion of sexual exploitation, abuse or harassment.</li> <li>Suspected breach of safeguarding obligations.</li> <li>Allegation, disclosure, reasonable suspicion, arrest, charge, or conviction related to sexual exploitation, abuse or harassment.</li> <li></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>When should it be reported?</b>    | <b>Mandatory and Immediate Reporting to Sight For All via <a href="#">secure online form</a> within 24 hours</b> applies to all suspected, alleged or known incidents of sexual exploitation, abuse or harassment.<br><br>Where a matter relates to DFAT business, it must also be reported to DFAT within 24 hours. Anyone can make a report to DFAT: <a href="mailto:seah.reports@dfat.gov.au">seah.reports@dfat.gov.au</a> where the matter relates to DFAT business.<br><br>Sight For All requests that where possible and appropriate, reports are made to Sight For All in the first instance, who will ensure the matter is reported to DFAT within the required timeframe.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Who should it be reported to?</b>  | Reports should be made to Sight For All via the <a href="#">secure online reporting form</a> . Reports submitted via this form are confidential and accessible only to authorised Sight For All personnel. Where a person cannot access the online form, reports may be made verbally to a Sight For All representative as below, followed by other accessible alternative written format.<br>Sight For All General Manager – + 61 401 192 676 – <a href="mailto:ccarrillo@sightforall.org">ccarrillo@sightforall.org</a><br>Sight For All Chair – + 61 418 857 813 – <a href="mailto:rcasson@sightforall.org">rcasson@sightforall.org</a><br>Sight For All Vice Chair – + 61 405 150 071 – <a href="mailto:kharris@sightforall.org">kharris@sightforall.org</a><br>Sight For All Cambodia Country Officer – +855 1220 0717 – <a href="mailto:cambodia@sightforall.org">cambodia@sightforall.org</a><br>Sight For All Myanmar Project Officer – +959 962 850 213 – <a href="mailto:projects@sightforall.org">projects@sightforall.org</a><br>Sight For All Mongolia Project Officer – <a href="mailto:mongolia@sightforall.org">mongolia@sightforall.org</a><br>Sight For All Laos Project Officer – <a href="mailto:laos@sightforall.org">laos@sightforall.org</a><br><br>Where the matter relates to DFAT business, the General Manager or Chair will then report the incident to DFAT via the DFAT Sexual Exploitation, Abuse and Harassment Incident Notification Form and via email to <a href="mailto:seah.reports@dfat.gov.au">seah.reports@dfat.gov.au</a> / <a href="http://www.dfat.gov.au/pseah">www.dfat.gov.au/pseah</a> |
| <b>How should the report be made?</b> | Reports should be submitted through the Sight For All <a href="#">secure online form</a> as the primary reporting channel. PDF or other accessible versions of the form may be provided where required for accessibility purposes.<br>Reports can be made verbally initially and are then required in writing.<br>Reports can be made to a sight For All representative as noted in “Who should it be reported to” above.<br>Sight For All will ensure appropriate authorities, in Australia and/or partner countries are informed. This includes advising the insurance provider via the insurance broker.<br>Where safe to do so, and in accordance with the wishes of the victims, survivors and whistleblowers, all alleged SEAH incidents that involve a criminal aspect should be reported through the correct law enforcement channels.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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| <p><b>What are the next steps?</b></p> | <p>Sight For All will review the report promptly, prioritise immediate safety and wellbeing, assess whether the matter relates to DFAT business, and ensure DFAT reporting has occurred within the required time.</p> <p>Sight For All will then conduct a preliminary assessment to determine whether there may have been a criminal act, breach of Code of Conduct, or other safeguarding concern:</p> <p>Where appropriate, this may be reported to the appropriate law enforcements authorities and consideration given to whether any administrative investigation will be postponed.</p> <p>If it is found there has been a breach of the Code of Conduct, a formal internal investigation process will be undertaken by the Sight For All Board of Directors. This process may include the following:</p> <ul style="list-style-type: none"> <li>○ Gather and study background material and documentary evidence</li> <li>○ Interview complainant</li> <li>○ Interview victims if different from above</li> <li>○ Interview witnesses if they exist</li> <li>○ Interview subject of complaint</li> <li>○ Write investigation report</li> <li>○ Conclude the investigation with recommendations</li> </ul> <p>Sight For All will ensure investigations, notifications and other response actions are in line with procedural fairness, confidentiality and the wishes of the victim-survivor.</p> |
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## 16. Reporting Requirements for DFAT Funded Projects

**MANDATORY IMMEDIATE REPORTING applies to all DFAT partners and is to occur within 24 hours.**

Mandatory reporting includes any suspected, alleged or known incidents of sexual exploitation, abuse and harassment related to DFAT business.

Reports are to be submitted to [seah.reports@dfat.gov.au](mailto:seah.reports@dfat.gov.au) using the [DFAT Incident Notification Form](#) where possible.

## 17. Sanctions

Where this PSEAH Policy has been breached, the individual will be immediately suspended from their role during the period of the breach investigation, or where there may be a potential risk to an individual's safety. Such action is taken as a matter of precaution and does not form evidence of a judgement of guilt. Sight For All believes in natural justice and does not presume guilt or innocence throughout the investigation process. Sight For All will immediately report any breach to DFAT where DFAT funding is involved.

Staff who are suspended during an investigation will continue to receive full pay during the suspension period. The exception is in circumstances of serious misconduct where an individual may be suspended without pay. Such exceptions are made at the discretion of the Board of Directors. Visionaries or volunteers who are stood down during an investigation will be reimbursed for reasonable expenses.

In circumstances of confirmed breaches of this PSEAH Policy, or when, after investigation by appropriate authorities, an individual is found to have sexually exploited, harassed or abused another individual, they will not be permitted to have any further involvement with Sight For All. In cases of an employee in breach of this PSEAH Policy, their employment with Sight For All will be terminated.

The following table, whilst not exhaustive, outlines the types of breaches, examples and corresponding actions to ensure transparency and consistency in enforcement.

| Level of Breach | Example Behaviours                                                                                                                                                                                               | Initial Action                                     | Possible Outcomes                                                                                                                                     |
|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Low</b>      | <ul style="list-style-type: none"> <li>• Inappropriate jokes or comments</li> <li>• Failure to complete mandatory training</li> </ul>                                                                            | Verbal or written warning                          | <ul style="list-style-type: none"> <li>• Re-training</li> <li>• Monitoring</li> <li>• Formal Warning</li> </ul>                                       |
| <b>Moderate</b> | <ul style="list-style-type: none"> <li>• Breach of Code of Conduct (non-criminal)</li> <li>• Failure to report a known incident</li> <li>• Inappropriate relationship with a colleague or beneficiary</li> </ul> | Formal Investigation                               | <ul style="list-style-type: none"> <li>• Suspension (with pay)</li> <li>• Counselling or training</li> <li>• Formal Warning</li> </ul>                |
| <b>Serious</b>  | <ul style="list-style-type: none"> <li>• Sexual harassment</li> <li>• Repeated breaches of this policy</li> </ul>                                                                                                | Immediate suspension                               | <ul style="list-style-type: none"> <li>• Termination of engagement</li> <li>• Referral to authorities</li> <li>• DFAT notification</li> </ul>         |
| <b>Critical</b> | <ul style="list-style-type: none"> <li>• Sexual abuse or exploitation</li> <li>• Criminal offence (eg assault, rape)</li> <li>• Retaliation against whistleblowers or survivors</li> </ul>                       | Immediate suspension and report to law enforcement | <ul style="list-style-type: none"> <li>• Termination</li> <li>• Legal action</li> <li>• Permanent disqualification from future involvement</li> </ul> |

## 18. Translation

Key elements of this policy are translated into the local language for dissemination to Fellows, project participants and partners along with the full version of the policy.

## 19. Related Documents

Sight For All Code of Conduct Policy  
 Sight For All Child and Young Person Protection Policy  
 Sight For All Criminal Record Check Policy  
 Sight For All Complaints Handling Policy  
 Sight For All Human Resources Policy  
 Sight For All Incident Investigation and Reporting Policy  
 Sight For All Partner and Capacity Assessment Procedure  
 Sight For All Recruitment and Selection Procedure  
 Sight For All Environmental and Social Safeguard Policy  
 Sight For All Termination of Employment Policy  
 Sight For All Whistleblower Policy  
 Sight For All Workplace Bullying Policy  
 Sight For All Vulnerable Persons Code of Conduct  
[Sight For All Online reporting Form Mandatory and Immediate](#)  
[Sight For All Reporting Form Mandatory and Immediate](#)  
 DFAT PSEAH Policy  
[DFAT Preventing Sexual Exploitation, Abuse and Harassment Risk Guidance Note](#)  
 ACFID Code of Conduct, Commitment 1.5 (<https://acfid.asn.au/code-of-conduct/>)

## 20. Review

The Sight For All PSEAH Policy is reviewed on an annual basis.

**Sight For All PSEAH Policy**  
Approved by the Board of Directors  
Version 8

| Document Revision History |           |                  |
|---------------------------|-----------|------------------|
| Document Name             | Version # | Date Approved    |
| PSEAH Policy              | 1         | 28 May 2019      |
| PSEAH Policy              | 2         | 17 November 2020 |
| PSEAH Policy              | 3         | 25 June 2021     |
| PSEAH Policy              | 4         | 16 November 2021 |
| PSEAH Policy              | 5         | 2 September 2022 |
| PSEAH Policy              | 6         | 19 March 2024    |
| PSEAH Policy              | 7         | 17 June 2025     |
| PSEAH Policy              | 8         | 28 July 2026     |

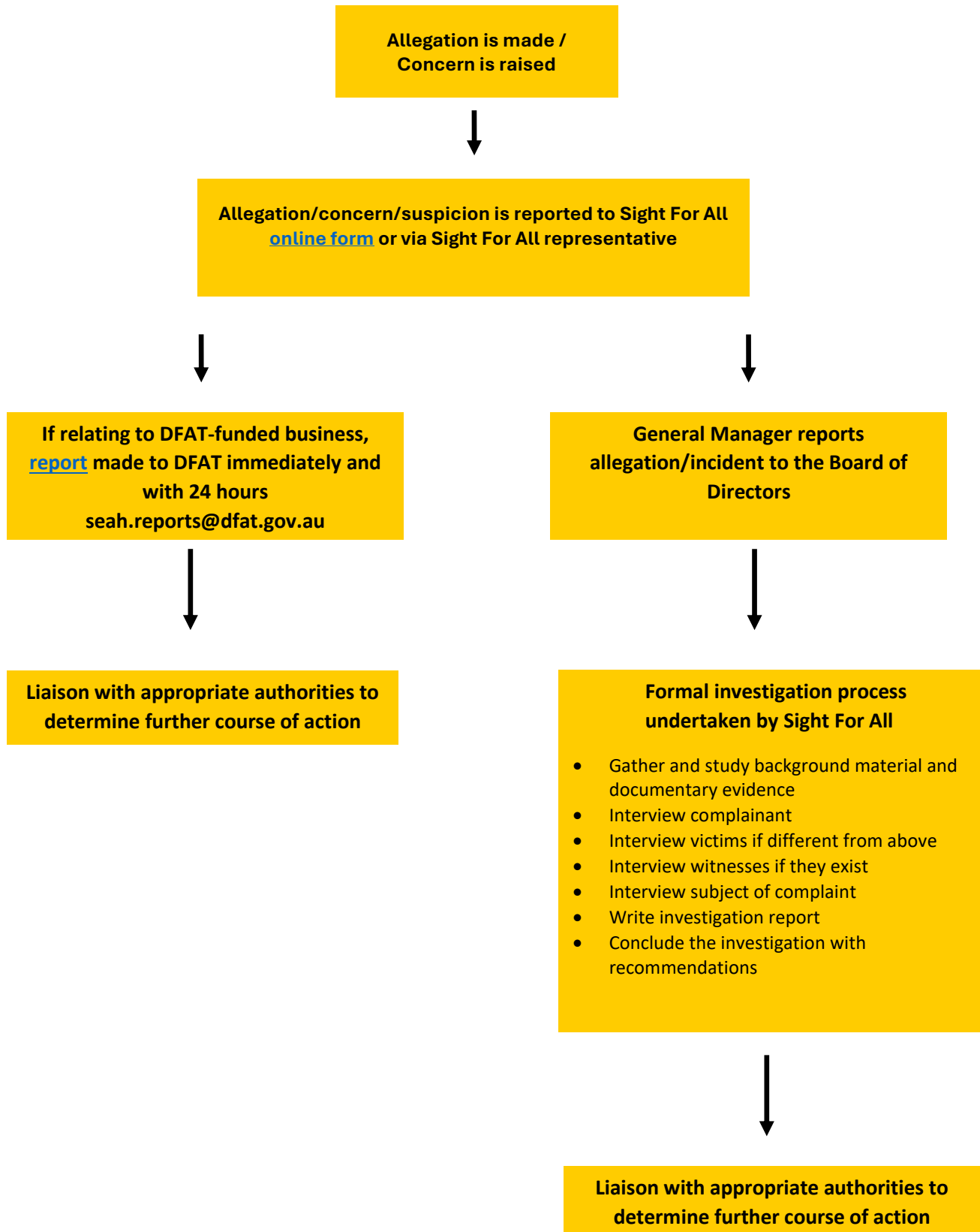
## ADDENDUM A

### PSEAH Reporting Process

The process is to be followed in responding to **MANDATORY IMMEDIATE** reporting.

Such reporting is to be made within 24 hours of the alleged incident occurring. Reporting is required within this period for DFAT funded activities. Sight For All employs the same process of all projects.

An example of such reporting includes an allegation against a Sight For All Visionary teaching in-country as part of an ANCP funded project.



## ADDENDUM B

### Definitions

|                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Sexual Exploitation</b> | 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 from sexual exploitation of another. For example, coercing individuals into engaging in sexual activities in exchange for aid, services, employment opportunities or other benefits.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Sexual Abuse</b>        | The actual or threatened physical intrusion of a sexual nature, whether by force or under physical or coercive conditions. This includes all forms of sexual assault, rape, molestation and other forms of non-consensual sexual activity.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Sexual Harassment</b>   | Any unwelcome conduct of a sexual nature that occurs in circumstances in which a reasonable person, aware of those circumstances, would anticipate that the person being harassed might feel offended, humiliated or intimidated. Sexual harassment can take various forms. It can be overt, covert or subtle. It can be repeated or an one-off incident. Sexual harassment can happen in person, over the phone or online – including via social media. Anyone can experience sexual harassment, regardless of their sex, gender identity, sexual orientation or intersex status. Examples include but are not limited to: unwelcome physical touching, jokes, comments or messages of a sexual nature; suggestive looks, staring or leering, display of or circulation of pornographic material; and sharing or threatening to share intimate images or video without consent. |
| <b>Fraternisation</b>      | Refers to any relationship occurring in the course of conducting business, that involves – or appears to involve – partially, preferential treatment or improper use of rank or position included but not limited to voluntary sexual behaviour.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Transactional Sex</b>   | The exchange of money, employment, goods or services for sex, including sexual favours.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Victim/Survivor</b>     | Victim-survivor is a term used to describe a person who is, or who has been, sexually exploited, abused or harassed. The term ‘victim-survivor’ acknowledges both the harm suffered (victim) and the resilience or agency of the individual 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.                                                                                                                                                                                                                                                                                                                                                                                                                                  |

## **ADDENDUM C**

### **Relevant Legislation**

- DFAT Preventing Sexual Exploitation, Abuse and Harassment Policy  
<https://www.dfat.gov.au/sites/default/files/protection-sexual-exploitation-abuse-harassment-policy.pdf>
- DFAT's Protection from Sexual Exploitation, Abuse and Harassment and Child Protection Policies  
<https://www.dfat.gov.au/sites/default/files/dfat-protection-sexual-exploitation-abuse-harassment-child-protection-policies.pdf>
- ACFID Code of Conduct, specifically Commitment 1.5  
<https://acfid.asn.au/code-of-conduct>
- Commonwealth Criminal Code Act 1995  
<https://www.legislation.gov.au/C2004A04868/latest/text>
- The UN Convention on the Elimination of All Forms of Discrimination against Women  
<https://www.un.org/womenwatch/daw/cedaw/>
- The UN Convention on the Rights of the Child  
<https://www.unicef.org.au/united-nations-convention-on-the-rights-of-the-child>

#### Local legislation

When working in-country, Sight For All personnel are also required to abide by local legislation.