

Prevention of Sexual Exploitation, Abuse and Harassment Policy



1. Scope

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

Sight For All does not tolerate sexual exploitation, abuse or harassment of any kind.

Sexual exploitation, abuse or harassment by or towards any Board Director, staff member, Fellow, Ophthalmic Country Officer, Visionary, volunteer, contractor, supplier, customer or patient will not be tolerated under any circumstances.

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 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 Sight For All and revised versions when the policy is updated.

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

In addition to the requirement of adhering to this policy, Sight For All 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 Sight For All Board Directors, staff, Visionaries, volunteers, Ophthalmic Country Officers, Fellows, project participants and project partners.

2. 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 which 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 strategies to ensure that all Sight For All 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 Sight For All 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.

3. 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 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 Sight For All are aware of this policy and guidelines.

As such the Sight For All 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 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.

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

Sight For All 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 by Visionaries via trip reports; ongoing review by the Ophthalmic Public Health Officer and review at monthly operations meetings.

All involved with Sight For All 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.

5. Code of Conduct

Sight For All has a Code of Conduct Policy and Vulnerable Person's Code of Conduct that must be adhered to.

The Vulnerable Person's Code of Conduct is required to be read, acknowledged and signed prior to the engagement with Sight For All. The Code of Conduct Policy and Vulnerable Person's Code of Conduct outline the expected behaviours that Board Directors, staff, Visionaries, Fellows, volunteers and partner organisations are required to display at all times.

Failure to comply with the Code of Conduct Policy and Vulnerable Person's Code of Conduct may result in disciplinary action, restriction of duties, termination of services, legal action or criminal investigation.

6. Responsibilities

Sight For All 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, Visionaries, Fellows, 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.

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
- 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.

7. PSEAH Officer

The Sight For All PSEAH Officer is the Executive Officer. The Executive Officer holds responsibility for promoting the prevention of sexual exploitation, abuse and harassment, coordinating training, monitoring and compliance and answering any queries.

The Sight For All Board of Directors supports the Executive Officer in undertaking training to remain abreast of prevention of sexual exploitation, abuse and harassment information on an ongoing basis.

8. Recruitment Practices

All those involved with Sight For All including Board Directors, staff, Visionaries, Fellows 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 Sight For All's suite of policies and procedures, including the Code of Conduct Policy and Child Protection Policy and sign the Vulnerable Person Code of Conduct.

Job descriptions are in place for all staff, Lead Visionaries 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.

Visionary and Fellow's duties are outlined in their respective handbooks.

Visionaries, Fellows and project partners are personally recommended to participate in Sight For All projects.

9. Training of Personnel

All Sight For All Board Directors, staff, Visionaries, Fellows and project partners receive a copy of this PSEAH Policy upon engagement with Sight For All.

All Sight For All personnel are required to read and sign the Vulnerable Person's Code of Conduct upon engagement and prior to mobilisation in-country.

Visionaries are provided with information about the prevention of sexual exploitation, abuse and harassment in the Visionary handbook and via a video induction to be watched prior to mobilisation.

The Executive Officer or Country Officer deliver workshops on cross cutting issues, including sexual exploitation, abuse and harassment, to all Fellows and project participants. These workshops are delivered upon project commencement and on an annual basis thereafter.

Visionaries are aware of specific risk assessments for projects via Project Management Plans.

10. Reporting Processes

All concerns or allegations of sexual exploitation, abuse and harassment must be reported immediately. Sight For All takes all reports and concerns seriously and acts on them immediately.

In investigating concerns or allegations of sexual exploitation, abuse and harassment, Sight For All 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?	Sight For All personnel and representatives. Individuals
What should be reported?	Any allegation from an individual or Sight For All representative regarding sexual exploitation, abuse or harassment. Any suspected breaches of Sight For All's PSEAH Policy, DFAT PSEAH Policy, Sight For All Vulnerable Person Code of Conduct or the ACFID Code of Conduct, Commitment 1.5. Any observation of concerning behaviour exhibited by Sight For All representatives that may breach Sight For All's PSEAH Policy, DFAT PSEAH Policy, Sight For All Vulnerable Person Code of 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.
Who should it be reported to?	Sight For All Executive Officer – 0400 249 709 Sight For All Chairman – 0419 977 509 The Executive Officer of Chairman 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
How should the report be made?	Reports can be made verbally initially and are then required in writing. Reports of abuse are to be made using the Sight For All Reporting Form for suspected cases of sexual exploitation, abuse and harassment.
What are the next steps?	Sight For All will conduct a preliminary assessment of the situation and determine whether on the basis of the information at hand there has been a criminal act or a breach of code of conduct: If it is clear that 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. If there has been a breach of the code of conduct, then a formal

	<p>internal investigation process will be undertaken by the Sight For All 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- Write investigation report- Conclude the investigation with recommendations
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11. Related Documents

Police Check Policy

Sight For All Code of Conduct Policy

Sight For All Child Protection Policy

DFAT PSEAH Policy April 2019

Sight For All Incident Investigation and Reporting Policy

Sight For All Reporting Form for suspected cases of sexual exploitation, abuse and harassment

ACFID Code of Conduct, Commitment 1.5 (www.acfid.asn.au/code-of-conduct)

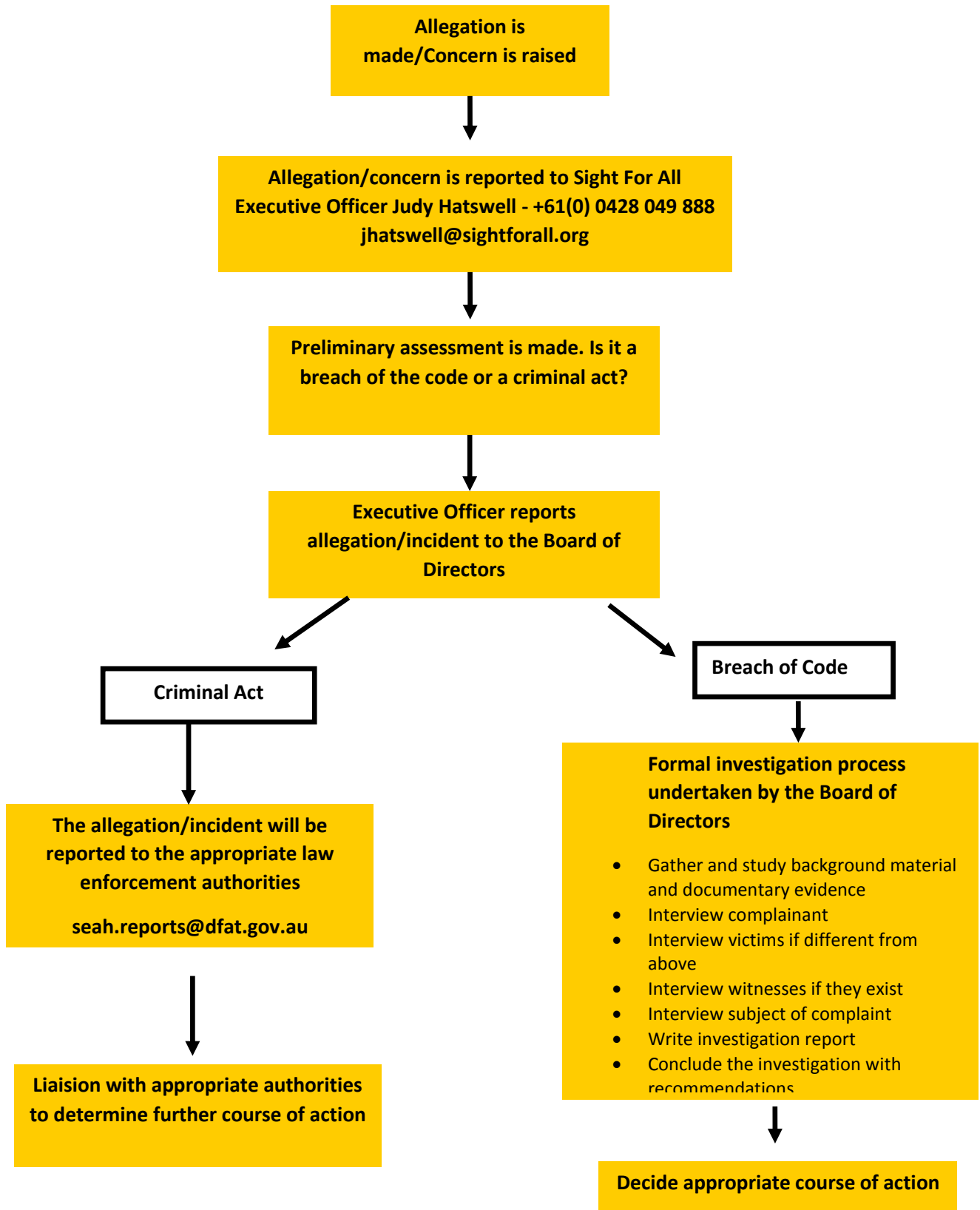
12. Review

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

Addendum A

Sexual Exploitation, Abuse and Harassment Reporting Process

The process is to be followed in responding to report of concern:



Addendum B Definitions

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 Abuse	The actual or threatened physical intrusion of a sexual nature, whether by force or under physical or coercive conditions. It covers sexual offences including but not limited to: attempted rape (which includes attempts to force someone to perform oral sex; and sexual assault (which includes non-consensual kissing and touching). All sexual activity is with someone under the age of consent (in the law of the host country or under Australian Capital Territory law [16 years], whichever is greater) is considered to be sexual abuse.
Sexual Harassment	A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favours, or engages in other unwelcome conduct of a sexual nature, in circumstances in which a reasonable person, having regard to all the circumstances would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated. Sexual harassment can take various forms. It can be obvious or indirect, physical or verbal, repeated or one-off and perpetrated by any person of gender towards any person of any gender. Sexual harassment can be perpetrated against beneficiaries, community members, citizens, as well as staff and personnel.
Transactional Sex	The exchange of money, employment, goods or services for sex, including sexual favours.
Victim/Survivor	A person who is, or has been, sexually exploited, harassed or abused.

Addendum C Relevant Legislation

- DFAT Preventing Sexual Exploitation, Abuse and Harassment Policy April 2019 (<https://dfat.gov.au/international-relations/themes/preventing-sexual-exploitation-abuse-and-harassment/Pages/default.aspx>)
- DFAT Child Protection Policy 2017 (<https://dfat.gov.au/about-us/publications/Pages/child-protection-policy.aspx>)
- 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/Details/C2019C00152>)
- 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 (www.unicef.org/crc)

Local legislation

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