Sight For All
Prevention of Sexual Exploitation, Abuse and Harassment Policy Fact Sheet

Sight For All does not tolerate sexual exploitation, abuse or harassment of any kind. It is the expectation that Sight For All representatives observe the highest possible standards of behaviour, ethics and integrity as a condition of engagement with the organisation. Sight For All takes a survivor-centred approach and plays an active role in preventing sexual exploitation, abuse and harassment. The Sight For All Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy outlines the practices in place to prevent sexual exploitation, abuse and harassment, enhance accountability and provide support to those affected. The Sight For All PSEAH Policy applies to all Sight For All Personnel including: Board Directors, employees, medical volunteers (Visionaries), non-medical volunteers, Ophthalmic Country Officers, Fellows, project participants, Eye Unit Directors, contractors, in-country representatives involved with Sight For All projects and partners that have a formal contractual relationship with Sight For All.

The Policy is underpinned by six guiding principles:
Principle 1: Zero tolerance of inaction
Principle 2: Strong leadership accelerates cultural change
Principle 3: Victim/survivor needs are prioritised
Principle 4: PSEAH is a shared responsibility
Principle 5: Gender inequality and other power imbalances are addressed
Principle 6: Stronger reporting will enhance accountability and transparency.

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 practices
• Provide a clear guide on what to do if sexual exploitation, abuse or harassment is suspected.

Key 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 the sexual exploitation of another.

**Sexual abuse:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal 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 with someone under the age of consent, is considered to be sexual abuse.

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

Policy Implementation

The following are key requirements in the implementation of the Sight For All PSEAH Policy and Sight For All’s endeavours to prevent sexual exploitation, abuse and harassment.

**Recruitment Practices**
Sight For All aims to recruit the safest and most suitable people to undertake positions, and will never knowingly engage, either directly or indirectly, an individual who poses an unacceptable risk to others.

**Training**
All Sight For All Board Directors, staff, Visionaries, volunteers, Ophthalmic Country Officer, Fellows, project participants, project partners, consultants and contractors receive a copy and sign their understanding of the PSEAH Policy and Vulnerable Person’s Code of Conduct.

Good Development Practice Workshops are conducted and includes a comprehensive section on the prevention of sexual exploitation, abuse and harassment. Topics covered include responsibilities, reporting processes, assessing risks, mitigation strategies and sanctions.
Partners
Non-Government Partners to Sight For All are required to maintain their own PSEAH policy. Government partners and Sight For All will work together to ensure that safeguarding standards are included in partner agreements. 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.

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 follows the DFAT Decision Making Framework for assessing the risk of sexual exploitation, abuse and harassment. The three steps are:
1) Is there a risk of sexual exploitation, abuse and harassment in the delivery of business?
   If yes,
2) Assess the level of risk
3) Once the level of risk is determined, the appropriate minimum standards of low/medium/high/very high are followed.

These steps are undertaken as part of the capacity assessment for all Sight For All projects.

At the project level, risk assessments are undertaken as part of the initiation and concept phases and 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.

Reporting
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. 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.

Any observation of concerning behaviour that may breach Sight For All’s PSEAH Policy, DFAT PSEAH Policy or any allegation or disclosure from an individual regarding exploitation, abuse or harassment should be reported, within two working days of become aware of the alleged incident or breach.

Mandatory and Immediate Reporting
Sight For All has specific reporting forms for:
- Mandatory and Immediate – reports to be made within 2 working days of the alleged incident occurring.
- Mandatory – reports to be made within 5 working days of becoming aware of policy, minimum standard or principles of non-compliance.

How do I make a report?
Reports can be made by: https://sightforall.org/complaints/ or by contacting one of the Sight For All representatives listed below:

Sight For All Executive Officer – jhatswell@sightforall.org
Mongolia/Sri Lanka/Myanmar Country Officer – myanmarcountryofficer@sightforall.org
Cambodia Country Officer – cambodiacountryofficer@sightforall.org
Sri Lanka Country Officer – srilankacountryofficer@sightforall.org