

# 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 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, project participants, Ophthalmic Country Officer, Visionary, volunteer, contractor, supplier, customer or patient will not be tolerated under any circumstances.

The purpose of this policy is to ensure protection of people, including children, 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 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.

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, Ophthalmic Country Officers, Fellows, 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.

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 Sight For All Code of Conduct Policy, ACFID Code of Conduct and DFAT's Prevention of Sexual Exploitation, Abuse and Harassment Policy.

## 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 7 minimum standards as outlined in the DFAT Preventing Sexual Exploitation, Abuse and Harassment Policy, April 2019. Additionally, this PSEAH Policy is required to comply with the ACFID Code of Conduct Compliance Indicator 1.5.1. This Sight For All PSEAH Policy is reviewed on an annual basis.

#### 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 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 to ensure that all Sight For All representatives are aware of internal and external reporting requirements.
- 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 and project beneficiaries at all times
- Treating all known and suspected reports of sexual exploitation, abuse and harassment in a sensitive, timely, respectful and confidential manner
- 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 Preventing Sexual Exploitation, Abuse and Harassment Policy:

- Zero tolerance of inaction  
Acting on all allegations in a fair and reasonable manner, ensuring procedural fairness.
- Strong leadership accelerates cultural change  
Leadership at Board and executive level sets clear expectations, models respectful behaviour and supports victims/survivors and whistleblowers to feel safe in reporting concerns
- Victim/survivor needs are prioritised  
Enabling a 'do no harm' approach that involves
  - treating 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.
- PSEAH is a shared responsibility  
Real change to reduce sexual exploitation, abuse and harassment will only occur if every sector plays a role.
- Gender inequality and other power imbalances are addressed  
The intersection of gender with other forms of inequality, such as worker/beneficiary, ability/inability can further increase the likelihood of sexual exploitation, abuse and harassment occurring.
- Stronger reporting will enhance accountability and transparency  
Reporting helps organisations focus on the prevention of sexual exploitation, abuse and harassment being a core focus of their work. Reporting to DFAT assists in monitoring sexual exploitation, abuse and harassment, understanding risks and improving safeguards.

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
- Having clear and internal reporting mechanisms and procedures for mandatory and immediate reporting of 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
- Designing and undertaking projects to protect people from harm that may arise when coming into contact with Sight For All
- 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
- Not exchanging money, employment, goods or services for sexual activity
- Not engaging in any sexual relationships with project beneficiaries.

## 7. Recruitment Practices

Sight For All aims to recruit the safest and most suitable people to undertake positions of Board Directors, staff, 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, Ophthalmic Country Officers, consultants and contractors. The table also outlines the requirements for Fellows, project participants and partners.

Position	Requirement															
	Criminal Record Check on engagement and updated every 2 years	Working with Children Check	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	ACFID Code of Conduct Workshop	Noted recommendation for position
Board Director	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓				✓	✓
Staff Member	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓			✓	
Visionary	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓
Volunteer	✓		✓	✓	✓	✓	✓	✓		✓	✓	✓				
Ophthalmic Country Officer	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓				✓
Fellow/Project Participant	✓		✓	✓	✓	✓	✓			✓	✓		✓			✓
Project Partner/Hospital Director	✓		✓	✓	✓	✓	✓			✓	✓		✓			
Consultant	✓	✓	✓	✓	✓	✓	✓			✓			✓			
Contractor	✓		✓	✓	✓	✓	✓			✓			✓			
Supplier										✓						

☼ Subject to project requirements and working with children check requirements per country.

**Table A**

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

**Personnel Screening / Criminal Record Checks**

As outlined in Sight For All's Criminal Record Check Policy, 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 also required to be updated every 2 years. The Criminal Record Check Policy 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, Ophthalmic Country Officers, 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 & Individuals, and Asian Development Bank Sanctions List. These lists are checked at the point of individuals and organisations commencing engagement with Sight For All and on a bi-annual basis thereafter.

**Staff Appointments**

Sight For All has a small staff team, with staff located in the Adelaide office. Sight For All's Country Officers in Cambodia, Myanmar and Sri Lanka 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 applicants most recent manager are conducted. All Sight For All employees are provided with a fixed term contract. These contracts include a clause regarding expectations for child protection and sanctions for breaching.

**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 2 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 Recruitment and Selection Procedure outlines details for the recruitment of and selection of staff, Visionaries and Board Directors.

## 8. 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.

## 9. Training

All Sight For All Board Directors, staff, Visionaries, volunteers, Ophthalmic Country Officers, 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 Person's Code of Conduct and Sight For All's Child 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, 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. The workshop includes delivery of information and incorporates scenarios.

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

## 10. Partners

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

At the commencement of projects, Sight For All coordinates a Good Development Practice Workshop. These workshops cover topics including child protection, prevention of sexual exploitation, abuse and harassment, gender equity, disability inclusion and anti-fraud and corruption. 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. 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 child safeguarding 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.

## **11. 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 3 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.

### **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 at Program Management Committee meetings, with ongoing review conducted by Project/Country Officers.

### **Organisational Level Risks**

Organisational risks are monitored by the Board of Directors on a biannual basis. This includes monitoring of PSEAH risks. Additionally, the Board of Directors review a different section of the risk register in further detail at each meeting. The Executive Officer 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.

## **12. 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 the point of engagement with Sight For All. The Code of Conduct Policy and Vulnerable Person's Code of Conduct outline the expected behaviours that Sight For All representatives are required to display at all times. The Code of Conduct and Vulnerable Person's Code of Conduct also forbids fraternisation and transactional sex. Failure to comply with the Code of Conduct Policy and

Vulnerable Person's Code of Conduct will result in disciplinary action, restriction of duties, termination of services, legal action or criminal investigation.

### 13. 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 & compliance, and answering any queries. Supporting the Executive Officer and additional points of contact in country are the Cambodian/Lao/Vietnam Country Officer and Myanmar/Mongolia/Sri Lanka Country Officer. 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.

### 14. 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.

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 is in accordance with the wishes of the victim/survivor.

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 (ie: 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 Protection Policy.**

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

<b>Who can make a report?</b>	Sight For All Board Director, staff member, Ophthalmic Country Officer, Visionary, volunteer, Fellow, project participant, project partner, consultant or contractor. Any member of the general public, including adults, children, young people, carers and guardians.
<b>What should be reported?</b>	Any observation of concerning behaviour that may breach Sight For All's PSEAH Policy, DFAT's PSEAH Policy, Sight For All's Code of Conduct, Sight For All's Vulnerable Person's Code of Conduct or the ACFID Code of Conduct. Any allegation or disclosure from an individual, Sight For All Board Director, staff member, Ophthalmic Country Officer, Visionary, volunteer, Fellow, project participant, project partner, consultant or contractor regarding exploitation, abuse or harassment of a sexual nature. Any suspected breaches of Sight For All's PSEAH Policy, DFAT PSEAH Policy, Sight For All Vulnerable Person Code of Conduct, Sight For All Code of Conduct Policy or the ACFID Code of Conduct, Commitment 1.5. A person having committed, been arrested for or convicted of a criminal offense(s) relating sexual exploitation, abuse or harassment.
<b>When should it be reported?</b>	For mandatory and immediate reporting – reports/concerns are to be made immediately and within 2 working days of becoming aware of an alleged incident. For mandatory reporting – reports/concerns are to be made within 5 working days of becoming aware of policy, minimum standard or principles of non-compliance. Anyone can make a report to DFAT. Sight For All requests that, where possible and

	appropriate reports are made to the Executive Officer, Chairman or Vice Chair in the first instance. The Sight For All Executive Officer, Chairman or Vice Chair will ensure the matter is reported to DFAT within the required time frame.
<b>Who should it be reported to?</b>	<p>Sight For All Executive Officer – 0400 249 709 or <a href="mailto:jhatswell@sightforall.org">jhatswell@sightforall.org</a></p> <p>Sight For All Chairman – 0419 977 509 or <a href="mailto:jsmuecke@bigpond.com">jsmuecke@bigpond.com</a></p> <p>Sight For All Vice Chair – 0418 857 813 or <a href="mailto:cassonrobert@gmail.com">cassonrobert@gmail.com</a></p> <p>Sight For All Cambodia, Lao, Vietnam Country Officer - +85512200717 or <a href="mailto:cambodiacountryofficer@sightforall.org">cambodiacountryofficer@sightforall.org</a></p> <p>Sight For All Myanmar, Mongolia and Sri Lanka Country Officer - +959962850213 or <a href="mailto:myanmarcountryofficer@sightforall.org">myanmarcountryofficer@sightforall.org</a></p> <p>DFAT via <a href="mailto:childwelfare@dfat.gov.au">childwelfare@dfat.gov.au</a></p> <p>Verbal reports can also be made to Sight For All's Country Officers or Ophthalmic Country Officers where they are not implicated in the breach. Refer to Addendum A for contact details. The Executive Officer or Chairman will then report the incident to DFAT via the DFAT Sexual Exploitation, Abuse and Harassment Incident Notification Form and emailed to <a href="mailto:seah.reports@dfat.gov.au">seah.reports@dfat.gov.au</a></p>
<b>How should the report be made?</b>	<p>Reports can be made verbally initially and are then required in writing.</p> <p>Reports can be made to the EO, Chairman, Vice Chair, Country Officer or OCO as outlined in "Who should it be reported to" above.</p> <p>Reports can initially be made using the accessible form using the link on the Sight For All website via <a href="https://sightforall.org/complaints/">https://sightforall.org/complaints/</a></p> <p>Following that, further details are to be included using Sight For All's Reporting Form for Suspected Cases of Sexual Exploitation, Abuse or Harassment. This form includes details such as:</p> <ul style="list-style-type: none"> <li>- Details of the incident,</li> <li>- Information about the individual</li> <li>- Description of safety to ensure the individual's safety</li> <li>- Information about the potential perpetrator</li> </ul> <p>Sight For All will ensure appropriate authorities, in Australia and/or partner countries are informed.</p>
<b>What are the next steps?</b>	<p>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:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• If there has been a breach of the Code of Conduct, then a formal internal investigation process will be undertaken by the Sight For All Board of Directors: <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> </li> </ul> <p>In conducting assessments, Sight For All ensures that the wishes of the victim/survivor are prioritised, while ensuring procedural fairness for all parties.</p>

## 15. Reporting Requirements for DFAT Funded Projects

There are two types of reporting required for DFAT funded projects:

### Mandatory and Immediate

Any alleged incident of sexual exploitation, abuse or harassment related to the delivery of DFAT business must be made within **two working days** of becoming aware of an alleged incident. Such an incident poses a significant reputational risk to DFAT. An example of Mandatory and immediate reporting is an allegation against a senior staff member of a partner organisation.

## Mandatory

An alleged policy non-compliance is to be reported by staff and DFAT partners within **five working days**. An example of mandatory reporting is a failure to adhere to DFAT's PSEAH Policy Minimum Standards or Principles.

## 16. 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 a 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, 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.

## 17. 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.

## 18. Related Documents

Sight For All Code of Conduct Policy  
Sight For All Child Protection Policy  
Sight For All Criminal Record Check Policy  
Sight For All Complaints Handling Policy  
Sight For All Human Resources Policy  
Sight For All Partner and Capacity Assessment Procedure  
Sight For All Recruitment and Selection Procedure  
Sight For All Reporting and Investigating Incidents, Concerns and Allegations Procedure  
Sight For All Safeguarding Policy  
Sight For All Termination of Employment Policy  
Sight For All Whistleblower Policy  
Sight For All Workplace Bullying Policy  
Sight For All Vulnerable Person's Code of Conduct  
Sight For All Reporting Form for suspected cases of sexual exploitation, abuse and harassment  
DFAT PSEAH Policy April 2019  
DFAT Preventing Sexual Exploitation, Abuse and Harassment Risk Guidance Note  
ACFID Code of Conduct, Commitment 1.5 ([www.acfid.asn.au/code-of-conduct](http://www.acfid.asn.au/code-of-conduct))

## 19. Review

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

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Sight For All PSEAH Policy November 2021

Approved by the Board of Directors 16 November 2021

Version 4.0

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

## ADDENDUM A

### Sight For All contact details

Executive Officer	Mrs Judy Hatswell	0400 249 709	<a href="mailto:jhatswell@sightforall.org">jhatswell@sightforall.org</a>
Chairman	Dr James Muecke	0419 977 509	<a href="mailto:ismuecke@bigpond.com">ismuecke@bigpond.com</a>
Vice Chair	Prof Robert Casson	0418 857 813	<a href="mailto:cassonrobert@gmail.com">cassonrobert@gmail.com</a>
Country Officer – Myanmar, Mongolia & Sri Lanka	Dr Ye Win	+959962850213	<a href="mailto:myanmarcountryofficer@sightforall.org">myanmarcountryofficer@sightforall.org</a>
Country Officer – Cambodia, Lao & Vietnam	Mr Sith Sam Ath	+8551200717.	<a href="mailto:cambodiacountryofficer@sightforall.org">cambodiacountryofficer@sightforall.org</a>

## ADDENDUM B

### PSEAH Reporting Process

The process is to be followed in responding to **MANDATORY AND IMMEDIATE** reporting. Such reporting is to be made within 2 working days 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.



## PSEAH Reporting Process

The process is to be followed in responding to **MANDATORY** reporting. Such reporting is to be made within 5 working days of becoming aware of policy, minimum standard or principles of non-compliance. An example of such reporting includes non-compliance of the Sight For All PSEAH Policy, DFAT PSEAH Policy or DFAT minimum standards or principles.



## ADDENDUM C

# Sight For All Vulnerable Persons Code of Conduct



Sight For All has an organisational commitment to the inclusion and protection of those who are vulnerable. This includes both adults and children.

### Definitions:

- 'Vulnerable persons' are defined as a people aged under 18 or other individuals who may be unable to take care of themselves or are unable to protect themselves against harm or exploitation.  
<https://www.acnc.gov.au/tools/topic-guides/vulnerable-persons-or-people>
- 'Child' means every human under the age of 18 unless under the law applicable to the child, majority is attained earlier. <https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

The purpose of the Sight For All Vulnerable Persons Code of Conduct is to set out the standards of behaviour that Sight For All expects in the protection of children and vulnerable people.

The Sight For All Vulnerable Persons Code of Conduct applies to all Sight For All 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. It also includes Sight For All supporters attending hospital or clinical sessions.

All parties mentioned above are required to read, sign and abide by this Code of Conduct, in conjunction with Sight For All's Code of Conduct Policy.

### General obligations

I understand that the obligations listed below apply while I am representing Sight For All. This includes while I am in Australia or a partner country, when I am publicly displaying a connection to Sight For All (such as via social media or in wearing branded clothing or name badges) and in situations where I am recognised as a Sight For All representative.

### In signing the Sight For All Vulnerable Persons Code of Conduct I will:

- Conduct myself in a manner consistent with Sight For All's values, Code of Conduct Policy, Child Protection Policy and Protection of Sexual Exploitation, Abuse and Harassment Policy (PSEAH) Policy
- Treat all people (children and adults) with respect regardless of their age, race, colour, gender, language, religion, opinions, nationality, ethnicity, social origin, property, disability or other status
- Not use language or behaviour towards children or adults that is inappropriate, harassing, abusive, sexually provocative, intended to humiliate, demeaning or culturally inappropriate
- Not engage children and/or vulnerable persons in any form of sexual activity or acts, including paying for sexual services or acts
- Not engage anyone unwillingly in any form of sexual activity or acts
- Wherever possible ensuring that another adult is present when working in the proximity of children and /or vulnerable persons
- Not visit a child or vulnerable person's home alone or invite unaccompanied children or vulnerable persons into my home or accommodation, unless they are at immediate risk of injury or harm or in physical danger

- Not sleep close to an unsupervised child, children or vulnerable person unless absolutely necessary, in which case the supervisor's permission must be obtained, and ensuring that another adult is present if possible (noting that this does not apply to an individual's own children)
- Not use any form of physical punishment on children or vulnerable people
- Not to do things of a personal nature that a child or vulnerable person can do for themselves e.g. toileting, dressing or touching children or vulnerable person in an inappropriate way
- Not use any electronic equipment, including computers, mobile phones, video cameras or social media inappropriately and never exploit or harass children or vulnerable people or access other child exploitation material through any medium
- Not hire children or vulnerable people for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury
- Comply with all relevant Australian and local legislation, pertaining to the country in which Sight For All activities are being conducted. This includes during travel and includes labour laws in relation to child labour and the protection of vulnerable people
- Immediately report concerns or allegations of child abuse and exploitation in accordance with the Sight For All Child Protection Policy and any relevant legislative reporting requirements. This includes reporting immediately to Department of Foreign Affairs and trade (DFAT) where DFAT funding is involved
- Use the Sight For All Reporting Form for Suspected Cases of Child Abuse or Mistreatment when making a report
- Immediately report concerns or allegations of sexual abuse or exploitation as outlined in the Sight For All PSEAH Policy. This includes reporting immediately to DFAT where DFAT funding is involved
- Use the Sight For All Reporting Form for Suspected Cases of Sexual Exploitation, Abuse and Harassment when making a report
- Immediately disclose all charges, convictions and outcomes of an offence, which occurred before or occurs during my association with Sight For All that relate to child exploitation or abuse and sexual exploitation and abuse
- Not condone or participate in any child related activity which is illegal, unsafe or abusive
- Not form a physical relationship with another Visionary, Fellow or local person, to avoid any risk of power imbalances
- Not engage in any fraternisation while engaged in direct delivery of DFAT project activities
- Be aware of behaviour and avoid actions or behaviours that could be perceived by others as child exploitation and abuse
- Be aware of behaviour and avoid actions or behaviour that could be perceived by others as sexual exploitation or abuse
- Not abuse my position within Sight For All at the expense of or to the detriment of others.

**Photographing or filming children or vulnerable people and use of images for work-related purposes**

I agree that while working or volunteering with Sight For All or being engaged in Sight For All related activities and when photographing or filming a child or using an image for work-related purposes, I will:

- Gain consent from the child or their parent/guardian of the child prior to taking images, and ensure that they understand how the images will be used
- Have assessed and endeavour to comply with local traditions and restrictions for the reproduction of images
- Ensure that photographs and filming taken depict children and vulnerable people in a dignified and respectful manner and not in a submissive or vulnerable manner. Children will be adequately clothed and not in poses that could be viewed as sexually suggestive
- Ensure that images are an honest representation and related to the work undertaken by Sight For All in the context of the setting

- Ensure that file labels, text relating to images do not reveal identifying information about the child when sending images electronically or using the images in an form such as publications or social media
- Follow the requirements as set out in the Sight For All Personal Image Consent Procedure and use the Sight For All Personal Image Consent Form.

I have read the Sight For All Code of Conduct, Child Protection, Human Rights, and PSEAH Policies and understand my responsibility to abide by these guidelines at all times to protect myself and the children and vulnerable people I may come into contact with through my involvement with Sight For All. I understand that I must use common sense and avoid actions and behaviours that may be construed as child exploitation, child abuse or sexual abuse and exploitation.

I agree to abide by Sight For All's Code of Conduct Policy and the ACFID Code of Conduct, of which Sight For All is a signatory.

I understand that failure to comply with this code may result in disciplinary procedures, restriction of duties, termination of services, legal action or criminal investigation.

Signature: \_\_\_\_\_

Full Name: \_\_\_\_\_

Date: \_\_\_\_\_

Attachments    Sight For All Child Protection Policy, June 2021  
                      Sight For All Prevention of Sexual Exploitation, Abuse and Harassment Policy (PSEAH), June 2021

Date of Revision – June 2021

## ADDENDUM D

**SIGHT FOR ALL**  
**REPORTING FORM FOR SUSPECTED CASES OF SEXUAL EXPLOITATION,**  
**ABUSE & HARASSMENT**  
**MANDATORY AND IMMEDIATE REPORTING**



*This reporting form is to be used in responding to MANDATORY and IMMEDIATE reports of sexual exploitation, abuse and harassment. The form is to be completed and sent to Sight For All within 2 working days of the incident occurring.*

**In emailing this form the subject line should read 'CONFIDENTIAL URGENT EMAIL'.**

Name of person completing report: \_\_\_\_\_ Date: \_\_\_\_\_

Email address: \_\_\_\_\_ Phone number: \_\_\_\_\_

### Information about the individual

Name of individual involved: \_\_\_\_\_

Phone number: \_\_\_\_\_

Individual's address: \_\_\_\_\_

DOB: \_\_\_\_\_ Male  Female

### Details of incident

Date of incident: \_\_\_\_\_ Time of incident: \_\_\_\_\_

Location of incident: \_\_\_\_\_

Name(s) of witnesses: \_\_\_\_\_

Description of incident (please describe the sequence of events):

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Please tick which situation you are reporting on:

- Witnessing an incident of sexual, exploitation, abuse or harassment
- Suspected sexual, exploitation, abuse or harassment
- An accusation of sexual, exploitation, abuse or harassment
- A report of sexual, exploitation, abuse or harassment been made against you
- You are aware that an individual has been sexually exploited, abused or harassed

Is the individual a Sight For All Board Director, employee, Visionary or non-medical volunteer

Yes  No

Do you believe the individual is currently safe: Yes  No

Please describe what has been implemented to ensure the individual's safety:

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Does the individual have a disability: Yes  No

If **yes**, please provide details of the disability:

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Do you believe the individual is:

- Particularly vulnerable Yes  No
- Is traumatised Yes  No
- Has been repeatedly abused Yes  No

Is an interpreter required to communicate with the individual: Yes  No

Are there specific cultural factors to be considered: Yes  No

If **yes**, what are they: \_\_\_\_\_

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Have other organisations been informed of this abuse: Yes  No

If **yes**, list the organisations, names and contact details of who you liaised with:

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**Information about the potential perpetrator**

Name: \_\_\_\_\_ Male  Female

Relationship to the individual: \_\_\_\_\_

Relationship to Sight For All: \_\_\_\_\_

Contact details: \_\_\_\_\_ Employer: \_\_\_\_\_

Has the potential perpetrator been confronted with the allegations: Yes  No

If **yes**, detail the conversation:

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Is there any further information you would like to provide: Yes  No

If **yes**, please list below:

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Signature of person completing the report: \_\_\_\_\_ Date: \_\_\_\_\_

Signature of Executive Officer/Chairman: \_\_\_\_\_ Date: \_\_\_\_\_

Date received by Sight For All Office: \_\_\_\_\_

Name of Sight For All Representative conducting the investigation: \_\_\_\_\_

## ADDENDUM E

### Definitions

<b>Sexual Exploitation</b>	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.
<b>Sexual Abuse</b>	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.
<b>Sexual Harassment</b>	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.
<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>	A person who is, or has been, sexually exploited, harassed or abused.

## ADDENDUM F

### 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](http://www.unicef.org/crc))

#### Local legislation

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