

PREVENTING SEXUAL EXPLOITATION, ABUSE & HARASSMENT POLICY

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1. PURPOSE

IWDA is committed to a workplace that is free from sexual exploitation, sexual abuse, and sexual harassment.

All of us have a responsibility to act in an ethical and transparent way to build a respectful working culture that rejects inappropriate behaviour, and where staff, partners and communities feel supported and valued.

This policy sets out expectations and requirements for IWDA staff and partners to manage the risks of sexual exploitation, sexual abuse, and harassment.

Where programs are supported by the Department of Foreign Affairs and Trade (DFAT) specific requirements also apply under the DFAT Preventing Sexual Exploitation, Abuse and Harassment Policy (DFAT PSEAH Policy) which are included in this Policy.

2. SCOPE

This policy applies to all representatives of IWDA, including IWDA personnel (employees, volunteers, board members and consultants), family members accompanying staff on travel and assignment, and any other organisations or people acting for or on behalf of IWDA ('Representatives of IWDA').

This policy applies at all times when such persons are working for, travelling or representing IWDA, both during and outside normal working hours. It applies any time they are outside their country of residence on work-related travel, including socialising or holidaying (whether IWDA funded or self-funded) before or after work-related travel.

Staff of IWDA Partners are not considered IWDA representatives., but are required to comply with the requirements of this policy as set out in clause 8.4.

This PSEAH Policy is part of a suite of Safeguarding Policies, which must be read alongside this Policy. They include:

- IWDA Safeguarding Code of Conduct
- IWDA Child Protection Policy
- IWDA Safeguarding Reporting Procedure.

Other associated policies and procedures are listed in section 12: Reference and Related Documents.

3. COMMITMENT STATEMENT

IWDA's vision is gender equality for all. Our purpose is to defend and advance the rights of diverse women and girls. We cannot achieve our purpose without an unwavering commitment to preventing all forms of sexual exploitation, abuse, or harassment.

IWDA has zero tolerance for all forms of sexual exploitation, sexual abuse, or sexual harassment in our workplace, through our programs, activities, or partnerships or against anyone who accesses or benefits from our work.

We put systems in place to identify and manage risks. We carefully recruit, select and train personnel to understand their obligations and responsibilities. There are systems in place to respond when harm occurs. We will take all allegations or complaints seriously, ensuring that they are all reported in line with our Safeguarding Reporting Procedure and centred on the rights of survivors.

4. DEFINITIONS

4.1 Sexual exploitation

Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. Sexual exploitation includes, but is not limited to, profiting monetarily, socially, or politically from sexual exploitation of another.¹

4.2 Transactional Sex

The exchange of money, employment, goods, or services for sex, including sexual favours.¹

This is the definition of transactional used by the global donor community, with the implication that it is exploitative and forced. Therefore, IWDA has also included a separate definition of sex work (4.4). Sex workers who are adult and willing/volunteer to sell sex must be dignified through respect and protection by laws and policies.

4.3 Sex Trafficking

Sex trafficking is any activity where an individual is recruited, transported, transferred, harboured, or received through force, fraud, deception or coercion with the aim of exploiting them sexually².

4.4 Sex Work

Sex work is the consensual exchange of sexual services for money or goods, including housing, drugs or necessities, between adults. It may involve working independently, with others or for a third party. Individuals may engage in sex work regularly or sporadically. Sex work occurs in many different forms and settings, including street-based or web-based settings and escort services amongst others³.

4.5 Sexual abuse

The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Examples of sexual abuse include, but are not limited to:

Rape or 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 (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 assault (any unwanted or forced sexual act committed without consent) or threat thereof. Sexual assault can occur either against a person's will, by force or coercion, or when a person is incapable of giving consent, such as when they are under duress, or under the influence of drugs or alcohol. Sexual assault includes forcing someone to have sex with anyone.

¹ UN Women. Bridging the Gap: Sexual Exploitation, Abuse and Harassment.

² *ibid*

³ Sex Workers and Alliance Network. June 2020. Sex work vs trafficking: how they are different and why it matters. Issue Brief. Yale Global Health Justice Partnership. Accessed via: https://law.yale.edu/sites/default/files/area/center/ghjp/documents/issue_brief_sex_work_vs_trafficking_v2.pdf

Force includes:

- actual physical aggression, including but not limited to rape, forcible sodomy, forcible oral copulation, sexual assault with an object, sexual battery, forcible fondling (unwanted kissing or touching)
- threats of physical aggression
- emotional coercion
- psychological blackmailing.

Other examples include forcing a person to engage in forced transactional sex or pornography or videotaping or photographing sexual acts and posting it without permission or refusing to use safe sex practices.

4.6 Sexual harassment

A range of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for 'sexual favours', sexual, verbal or physical conduct, or gestures that are or might reasonably be perceived as offensive or humiliating. This includes jokes, comments or messages of a sexual nature; suggestive looks, staring or leering; display of or circulation of pornographic material. It is sometimes used to describe behaviour in a work environment but can also occur in communities and public spaces.

Examples of sexual harassment include, but are not limited to:

- name-calling with sexual epithets
- insisting on discussing anything sexual, including jokes that may be offensive, uncomfortable, frightening, or hurtful
- staring or leering
- unnecessary familiarity, such as unwelcome affection or touching
- suggestive comments or jokes
- insults or taunts of a sexual nature
- intrusive questions or statements about your private life
- displaying posters, magazines or screen savers of a sexual nature
- sending sexually explicit emails or text messages
- making obscene or sexually suggestive remarks
- inappropriate advances on social networking sites
- accessing sexually explicit internet sites
- requests for sex or repeated unwanted requests to go out on dates.

4.7 Fraternisation

Any relationship that involves, or appears to involve, partiality, preferential treatment or improper use of rank or position⁴. It could include, but is not limited to, voluntary sexual behaviour, sexual behaviour not amounting to intercourse, a close and emotional relationship involving public displays of affection or private intimacy, and the public expression of intimate relations.

The most common example of fraternisation is relationships, romantic, sexual or otherwise, between people who occupy different levels of authority or power and where the relationship is bringing real or perceived enhanced access to resources, social or political power or decision-making.

⁴ DFAT PSEAH Policy

4.8 Other definitions

Board Member – A Director, Chair or Co-Chair on the Board of Directors of IWDA.

Contractor – A person or organisation retained by IWDA to undertake a contract to provide materials, tasks, or labour to do a service or job.

Informed consent – Agreement to do something or to allow something to happen only after all the relevant facts are known.

IWDA Personnel - all IWDA employees, directors, volunteers, interns, consultants and contractors.

IWDA Representative - IWDA personnel and family members accompanying IWDA personnel on travel to project sites, and visitors to IWDA project sites.

Program partners – organisations with whom IWDA has signed Partnership Agreements and/or who receive DFAT or other donor funding in association with IWDA programs.

Visitor – A person who is not IWDA personnel, visiting an IWDA project site (i.e. donor/supporter visits).

Volunteer/ Intern – An unpaid person who acts on a voluntary basis supporting IWDA program delivery or operations.

5. GUIDING PRINCIPLES

The principles that underpin IWDA's Policy are:

Principle 1: Zero tolerance of inaction

Sexual exploitation, abuse and harassment are never acceptable. Zero tolerance is not the same as zero incidents. IWDA defines zero tolerance as acting on every allegation in a fair and reasonable way with due regard for procedural fairness.

Principle 2: Survivor needs are prioritised.

Action to address sexual exploitation, abuse and harassment should be underpinned by a “do no harm” approach prioritising the rights, needs, and wishes of the survivor, while ensuring procedural fairness to all parties. This approach treats the survivor with dignity and respect, involves them in decision making and provides them with comprehensive information. It also protects privacy and confidentiality, does not discriminate based on gender, age, race/ethnicity, ability, sexual orientation, or other characteristics and considers the need for counselling and health services to assist the victim/survivor with their recovery.

Principle 3: Preventing SEAH is a shared responsibility.

Preventing SEAH requires leadership, commitment, support and investment. IWDA has a responsibility to build our own capacity to effectively prevent, respond to, and report SEAH. Strong leadership is required to set clear expectations and model respectful behaviour.

Principle 4: Gender inequality and other power imbalances are addressed.

Available data indicates that the majority of survivors are female, and the majority of perpetrators are male. However, there are also other power imbalances at play.

Inequalities based on the distinctions of worker/beneficiary; ability/disability; ethnic and Indigenous status; religion; gender identity and sexual orientation; age; health and poverty, can also result in sexual exploitation, abuse and harassment. The intersection of gender with other forms of inequality can further increase the likelihood of SEAH occurring.

Engagement with intended beneficiaries should be based on respect for diversity, promotion of gender equality and social inclusion, accountability, and a strong “do no harm” focus.

6. POLICY

IWDA does not tolerate sexual exploitation, abuse or harassment. IWDA will take all reasonable steps to prevent sexual exploitation, abuse or harassment, and to promote the rights of people and communities with whom we work. IWDA will put in place processes to respond appropriately if sexual exploitation, abuse or harassment occurs.

It is strictly prohibited for IWDA representatives to engage in any form of sexual exploitation, abuse or harassment, including engaging in sex trafficking.

IWDA representatives must not engage in fraternisation.

For the avoidance of doubt, IWDA prohibits representatives from engaging in any form of transactional sex while outside of their country of residence for work related-purposes. This includes outside of normal work hours and in any pre or post-travel socializing or holidaying.

While IWDA does not consider all forms of transactional sex to be exploitative, we take this position because safety and human rights of women is our primary concern and IWDA representatives work in contexts, where it can be impossible to distinguish between sex work and forced transactional sex. This is particularly difficult to distinguish in countries and locations where sex work continues to be criminalised. Furthermore, even though IWDA continues to work to decolonise the international development sector, power imbalances persist. Power imbalances increase the risks of sexual exploitation.

IWDA will continue to advocate for the decriminalisation of sex work, as distinguished from sexual exploitation as outlined in our IWDA position on sex work (Sex Work Position Paper | IWDA). There is strong evidence that decriminalising sex work can contribute towards preventing sexual exploitation and trafficking. IWDA will be a voice in the international development sector, advocating for a contemporary, rights-based approach to preventing sexual exploitation and sex trafficking, whilst also protecting the rights of sex workers to bodily autonomy.

7. RESPONSIBILITIES

Board	• Oversight of this Policy • Approval of any revisions to this policy and IWDA's Safeguarding Code of Conduct. • Oversight and management of any SEAH complaints that relate to the IWDA CEO. • At the start of each new three-year term of IWDA's Board they will nominate a responsible Board Member for any reporting where the Chair or co-Chairs of the Board are implicated
CEO	• Overall implementation, monitoring and review of this Policy. • Authorising financial and human resource allocations to implement this Policy.

	• Accountability for tracking and responding to SEAH issues to ensure continuous monitoring and improvement • Authorising changes to the procedures, systems and performance management which support this policy • Monitoring IWDA compliance with relevant legislation, sector and donor requirements • Holding people accountable to IWDA's PSEAH requirements • Oversight and management of all SEAH complaints, including determining the most appropriate methods and personnel for investigating and addressing such reports, in accordance with this policy and the Whistleblowing procedure where applicable.
Director of Partnerships	• Initial risk assessment of organisations and activities to inform PSEAH policy development and application of minimum standards. • Documented plan for ensuring downstream DFAT funded program partners understand their risk profile and are meeting the required DFAT PSEAH minimum standards • Ensuring compliance with clause 8.3 including that controls are in place with program partners to manage and monitor the risk of SEAH and that processes are adhered to. • Ensuring all partnership team members undertake required PSEAH training • Oversight of PSEAH incident reports that relate to IWDA funded activities • Appointing IWDA Safeguarding Focal Points • The ongoing review and maintenance of this Policy to a standard which is compliant with Australian Government State and Federal, DFAT and ACFID requirements

The IWDA Leadership Team	• IWDA Managers at all levels have particular responsibilities to support and develop systems that maintain an environment free for sexual exploitation, abuse and harassment. • Ensuring that all IWDA personnel in their department, all contractors they engage and all visitors they invite onto a site comply with this policy and the IWDA Safeguarding Code of Conduct, including undergoing the required induction and training • Holding representatives accountable to IWDA's PSEAH requirements.
The People & Culture (P&C) Manager	• Ensuring that all IWDA personnel are adequately inducted, have completed the ACFID Safeguarding module, and signed IWDA's Safeguarding Code of Conduct. • Implementing and maintaining procedures to ensure: ○ safeguarding questions are asked at interviews ○ safeguarding questions are asked during personnel reference checks ○ safeguarding questions are asked during performance appraisals ○ criminal record checks are completed. Checks must be conducted for each country in which the individual has lived for 12 months or longer over the last 5 years, and for the individual's countries of citizenship. Where police checks aren't available, Statutory Declarations will be obtained. • Maintaining records of IWDA personnel PSEAH training • Supporting IWDA personnel to report according to the Safeguarding Reporting Procedure.
Safeguarding Focal Points	• Supporting the completion of any SEAH incident reporting and ensuring reporting procedures and documentation is completed. • Supporting the Director of Systemic Change and Partnerships by reviewing and providing feedback on program partner PSEAH policy and procedures, and SEAH capacity and risk assessments. • Delivering PSEAH training, as required • Acting as a first point of contact when IWDA personnel have a PSEAH question or concern and reporting the same to the CEO or, where the CEO is implicated, to the chair of the Board
All representatives of IWDA	• All IWDA representatives are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of IWDA's Code of Conduct • Role modelling awareness, responsibility and self-management • Reading, understanding and complying with this policy and Code of Conduct • Reporting any allegation, suspicion or disclosure of sexual exploitation, abuse or harassment, or breach of this Policy or the Code of Conduct in accordance with the Safeguarding Reporting Procedure

8. APPLICATION OF THIS POLICY

8.1 Awareness raising

This PSEAH Policy is published on the IWDA website.

Awareness raising of complaint mechanisms and reporting procedures during events and project activities is completed by IWDA and partner organisations.

8.2 Safeguarding Code of Conduct

IWDA's Safeguarding Code of Conduct communicates expectations around safeguarding conduct, including clear behavioural guidelines and expectations for preventing sexual exploitation, abuse, and harassment.

IWDA's Safeguarding Code of Conduct must be signed by all IWDA representatives upon commencement of their engagement, all family members who are accompanying IWDA personnel on travel and assignment before they commence such travel, all consultants and contractors and all personnel of IWDA program partner organisations working on IWDA supported programs as set out in clause 8.4.

8.3 Risk Management

While IWDA acknowledges that it is not possible to eliminate all risks of sexual misconduct sexual exploitation, abuse or harassment, it has adopted a risk management process by which risks are identified, monitored, and reasonably mitigated against in the assessment of all our programs, partnerships, and activities. This includes a process by which activities are assessed to determine the level of risk for sexual misconduct sexual exploitation, abuse or harassment, and the application of standards, such as DFAT PSEAH Minimum standards (Attachment 1), where applicable.

8.4 Program Partners

IWDA will undertake a risk assessment for all partners or other organisations acting for or on behalf of IWDA to identify and assess risks of sexual exploitation, abuse or harassment and determine which minimum standards must be implemented and maintained.

The risk assessments will be undertaken at the program design and proposal stage, form part of regular monitoring and be reviewed at regular reporting intervals.

Program partners will:

- a) act in accordance with the principles, minimum standards and requirements in this Policy, aligning with the risk assessment against the DFAT PSEAH Minimum Standards (Attachment 1).
- b) have their own Code of Conduct, which covers Safeguarding provisions, which is signed by employees, Board members, volunteers and contractors. If a partner does not have their own Code of Conduct they can sign the IWDA Code of Conduct.
- c) manage risks of SEAH through recruitment, screening, and employment practices.
- d) have risk management processes in place which identify, assess, mitigate, and monitor risks of SEAH. It is mandatory for all international program partners receiving Australian Government funds to comply with the DFAT PSEAH Policy and apply the minimum standards based on the associated level of risk (see DFAT PSEAH Risk Guidelines). It should be noted that under DFAT PSEAH Minimum Standards:
 - fraternisation for all non-national personnel in the field in "very high risk" areas is prohibited while engaged in the delivery of DFAT program funded business.
 - transactional sex is prohibited for all personnel while engaged in "very high risk" activities, while engaged in the direct delivery of DFAT program funded business in "very high risk" areas.

- e) Establish organisational reporting and investigation procedures.
- f) have PSEAH clauses included in all partnership agreements and agree to yearly compliance monitoring by IWDA.

IWDA will assist partners with information to support their compliance with these prevention of sexual exploitation, abuse and harassment requirements and to develop their own policies and reporting processes and systems. IWDA will review partner PSEAH related compliance on a yearly basis. Issues of non-compliance will be escalated to and closely monitored by the Director of Systemic Change and Partnerships.

IWDA may terminate a Partnership Agreement if it believes sexual exploitation, abuse or harassment gross misconduct has occurred, or there has been a serious or persistent breach of any of the obligations stated in Partnerships Agreements.

Refer to IWDA Partnership Agreement template

8.5 Recruitment and Screening

IWDA has robust practices for recruiting, screening and selecting IWDA personnel. These practices serve to minimise the risk of engaging anyone who does not share our commitment to safeguarding. Practices include:

- promoting IWDA's safeguarding commitment in job adverts and position descriptions.
- interview and verbal reference check questions relating to preventing sexual exploitation, abuse or harassment, relevant to roles.
- requiring all IWDA staff, volunteers, contractors, and board directors to undergo an Australian National Police Check prior to engagement and, where possible, for any country where they have lived for more than 12 months over the past 5 years. Where this is not achievable a statutory declaration may be required.
- completing working with children checks for Australian personnel whose role involves working directly with children.
- requiring applicants to disclose whether they have been investigated for sexual exploitation, abuse or harassment offences.

All employment contracts will include an entitlement for IWDA to dismiss, suspend or transfer employees to other duties, if they breach the PSEAH Policy or IWDA Code of Conduct.

Refer to [IWDA Recruitment and Selection Policy](#).

8.6 Staff training and support

All IWDA personnel, including employees, volunteers, and contractors, will receive the following training at a minimum:

- induction/introduction briefing into this Policy.
- induction/introduction briefing into the Safeguarding Code of Conduct
- induction/introduction briefing into the Safeguarding Reporting Procedure.

Those who are directly engaged in activities assessed as high risk or above, will complete additional PSEAH training.

All personnel are expected to participate in annual PSEAH training to ensure they continue to understand their obligations and responsibilities.

The PSEAH Policy is required reading as part of induction/ orientation/ pre-briefing processes for all IWDA representatives including employees, volunteers, interns, consultants, contractors, and partnership agreements.

These documents are also communicated through internal communications, contracts and via IWDA's website. A copy of this policy shall be placed on IWDA's shared drive and website.

Any travelling staff are required to have re-read and declare their understanding of this Policy, the IWDA Child Protection Policy, the IWDA Safeguarding Code of Conduct and the IWDA Safeguarding Reporting Procedures. In addition, IWDA require all travelling staff to have completed the IWDA Safeguarding E-Learning Module to ensure they understand safeguarding expectations.

9. REPORTING CONCERNS OR COMPLAINTS

IWDA **encourages** any person, including the general public, to report any concerns regarding sexual exploitation, abuse, or harassment (SEAH) or the behaviour or conduct of representatives of IWDA.

These concerns may include suspicions, allegations, observations, or disclosures about SEAH, or breaches to the PSEAH Policy or the IWDA Code of Conduct

Reports regarding SEAH matters may involve any of the following representatives of IWDA: employees, volunteers, contractors, consultants, board members, program partner representatives, or family members accompanying representatives.

IWDA **requires** any IWDA representative and partner organisations to immediately report any concern, complaint, allegation, suspicion, disclosure or observation of sexual exploitation, abuse or harassment or any breach of this Policy or the Safeguarding Code of Conduct. Anyone reporting in good faith, on reasonable grounds, will not suffer any sanctions from IWDA for raising their concern.

An individual victim or survivor is under no obligation to report any incident that has happened to them; however, IWDA will ensure individuals who self-report will have access to timely and suitable assistance.

Reporting concerns about sexual exploitation, abuse or harassment against children (people under the age of 18) should be made under IWDA's Child Protection Policy.

9.1 Making a complaint or raising a concern

Anyone wishing to make a complaint or raise a concern under this policy can notify IWDA using any of the following mechanisms:

- by phone: +61 3 8373 2500
- by email: ethics@iwda.org.au
- through our website: [Contact Us | IWDA](#)
- by post: Safeguarding Complaint, PO BOX 64, Flinders Lane, Victoria, Australia 8009
- in person to the safeguarding focal point or Program Manager.

Anyone can use whichever of these ways best fits with their individual needs.

In addition, IWDA representatives (including current or former, employees, staff, volunteers, consultants, officers, board directors, associates, suppliers) can inform their supervisor within IWDA at any time in person or via phone, text, email, or other communication.

If IWDA representatives prefer to make a Whistle Blower report, they can do so:

- by telephone on +61 3 8373 2500
- by email: ethics@iwda.org.au

For further information about Whistle Blowing, see the [IWDA-Whistle-Blower-Policy](#)

Anonymity: When making complaint, the complainant may do so anonymously. People are encouraged to share their identity making a complaint, as it will make it easier for IWDA to address the concern, but they are not required to do so. If they do not share their identity, IWDA will assess

the disclosure in the same way as if they had revealed their identity. However, there may be some practical limitations in conducting the investigation.

9.2 Confidentiality

Confidentiality is a key principle of managing complaints about sexual abuse, exploitation or harassment. Anyone receiving or managing a complaint must comply with the provisions regarding confidentiality. This means that all information about the complaint must be kept confidential and only shared with those that need to know and that are authorised to receive information.

This is part of IWDA's commitment to ensuring a survivor centred approach.

A survivor-centred approach aims to put the rights of each survivor at the forefront of all actions and ensure that each survivor is treated with dignity and respect. By putting the survivor at the centre of the process, such an approach promotes their recovery, reduces the risk of further harm and reinforces their agency and self-determination. Practicing a survivor-centred approach means establishing a relationship with the survivor that promotes their emotional and physical safety, builds trust and helps them to restore some control over their life⁵.

9.3 Responding to Concerns or Complaints

Concerns or complaints are managed and reported in accordance with the [IWDA Safeguarding Reporting Procedure](#), which is aligned with the [IWDA Complaints-Policy](#) and [IWDA Complaints Procedure](#). Each of these provide for confidentiality, objectivity, person and survivor centred approach, and accountability.

All concerns or complaints will be recorded, using the Incident Report template.

Refer: [IWDA Incident Report Form template](#)

The Safeguarding Focal Point will acknowledge receipt of the complaint, inform the complainant about the process and next steps. Complaints made anonymously or without any contact information will not be provided with this notification.

IWDA will complete an initial assessment of the report to assess how serious, complicated, or otherwise urgent the issues are that are raised through the report. This assessment will determine the next steps, which can include resolving and closing or further investigation.

If a complaint is not assessed as warranting a full investigation, the complainant will be notified including the reason for closing out the complaint without an investigation.

Where the initial assessment determines that further investigation is required, a prompt, impartial and appropriate investigation will be undertaken.

Complaints relating to IWDA personnel will be **investigated** by IWDA. If the CEO is implicated in a complaint, then a member of the Executive Leadership Team will manage the report.

Complaints related to IWDA partners, or their personnel will be investigated by the partner or by IWDA depending on the nature of the complaint.

The IWDA investigation process includes:

- Developing an investigation plan, ensuring that, where appropriate and in line with the wishes of the survivor, relevant authorities are consulted and involved in its design and implementation to ensure the IWDA workplace investigation does not compromise police or other statutory or regulatory processes.
- Obtaining and protecting evidence, including identifying relevant witnesses.

⁵ UNICEF, Caring for Survivors, a Principled Approach
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- Putting the allegations to the subject of complaint.
- Analysing evidence and making findings about the allegations.

9.4 External Reporting

9.4.1 Reports to external organisations

IWDA will report to the Department of Foreign Affairs and Trade (or any other donor agency) in accordance with donor agency policy and required timelines. These are outlined in detail in the IWDA Safeguarding Reporting procedure.

IWDA may be required to report to other donors or partners, in line with their contractual obligations.

If the report includes a complaint or allegation against a person employed by an IWDA partner organisation, subject to obligations of confidentiality, IWDA's Chief Executive Officer, or their delegate, will discuss the allegations with the partner organisation's Chief Executive Officer and decide together upon the next steps.

9.4.2 Reports to authorities or organisations

IWDA will make any notifications required by law.

If the report includes alleged or suspected criminal offenses, and it is safe to do so, and is in line with the wishes of victim(s), survivor(s), and whistleblowers, IWDA will report to local authorities

9.5 Case closure and Record Keeping

IWDA will report final investigation findings to the complainant, the subject of complaint and other stakeholders, considering privacy, confidentiality, and procedural fairness obligations. During this stage IWDA will also consider what, if any, ongoing supports are required for the complainant or survivor (if the survivor is different to the complainant). This may be support that IWDA can offer, or it may include facilitating referrals to other organisations.

9.5.1 Record keeping

As outlined in our Reporting Procedure, IWDA is committed to making and keeping full and accurate records of all SEAH related complaints. All complaints and information about the case, investigation, and outcomes will be recorded and stored securely in restricted access folders.

9.6 Escalation of complaint:

If you have already raised a concern or complaint, and are not completely satisfied with our response then you can contact the Australian Council for International Development (ACFID) at the address below:

The Australian Council for International Development www.acfid.asn.au

Phone: +61 2 6285 1816

Email: main@acfid.asn.au

Mail: Private Bag 3, Deakin ACT 2600

10. SEXUAL EXPLOITATION, ABUSE OR HARASSMENT AND SANCTIONS

All forms of sexual exploitation, abuse, or harassment, wherever or whenever it occurs, or any breach of this Policy or Code of Conduct will be deemed serious misconduct and potential grounds for termination.

Any person found to be involved in sexual exploitation, abuse or harassment may be subject to disciplinary action (including but not limited to termination of employment or engagement). IWDA may refer any person that has engaged in sexual exploitation, abuse or harassment to law enforcement authorities for further investigation.

Any person making allegations frivolously, maliciously or for personal gain, may also be subject to disciplinary action (including but not limited to termination of employment or engagement).

IWDA reserve the right to:

- Refuse employment or terminate any representative's employment or contract where an allegation of sexual abuse, exploitation or harassment has been substantiated.
- Dismiss or transfer to other duties personnel who breach IWDA's PSEAH Policy or Safeguarding Code of Conduct.

These terms of employment are included in all employment contracts.

IWDA requires that all staff, volunteers and board members sign that they have read, understood and agree to abide by the IWDA Code of Conduct, including the requirement to comply with this Policy.

Refer IWDA [Cessation of Employment Policy](#).

11. REVIEW AND AMENDMENT

This policy will be reviewed not less than every 3 years to ensure it remains compliant with law, relevant and effective. This policy may be amended by the Board.

IWDA will engage with stakeholders, including staff, volunteers, contractors, partners as well as community members who are impacted by this policy in the review process.

As part of the review process, IWDA will analyse SEAH complaints, incidents and reports to identify trends or other areas that will help to strengthen the Policy.

Changes to the policy will be communicated to representatives.

12. REFERENCES/RELATED DOCUMENTS

- IWDA Code of Conduct
- IWDA Safeguarding Code of Conduct
- IWDA Safeguarding Reporting Procedure
- IWDA Incident Report Form Template
- IWDA Child Protection Policy
- IWDA Complaints Policy
- IWDA Complaints Procedure
- IWDA Partnership Agreement Template
- IWDA Recruitment and Selection Policy
- IWDA Delegations Matrix
- IWDA Whistle Blower Policy
- IWDA Whistle Blower Procedure

- IWDA Fraud and Corruption Policy
- IWDA Resolving Issues in the Workplace Policy
- IWDA Respect and Dignity at Work Policy
- DFAT Preventing Sexual Exploitation, Abuse and Harassment Policy
- DFAT Preventing Sexual Exploitation, Abuse and Harassment Risk Guidelines

Attachment 1: DFAT Minimum Standards

DFAT PSEAH Minimum Standards						
Minimum standard	Obligation		Applies to			
	Organisations	Individuals	Low Risk	Med Risk	High Risk	Very High Risk
1. Have a PSEAH policy or other documented policies and procedures in place and clearly communicate expectations of	Must have a PSEAH policy or other documented policies and procedures in place, which clearly meet the expectations of this Policy.	Sign a document outlining appropriate and enforceable standards of conduct, compliant with the requirements of this Policy	✓	✓	✓	✓
2. Have reporting and investigation procedures in place.	The PSEAH policy, or equivalent, documents how SEAH incidents will be managed, reported and investigated. Reporting and investigation processes must include engagement of and reporting to senior management and executive boards.	Through a document which outlines appropriate and enforceable standards of conduct, confirm awareness of DFAT's PSEAH reporting requirements for concerns or incidents and policy non-compliance.	✓	✓	✓	✓
3. Have risk management processes that include the risk of SEAH.	Have effective risk management processes that include consideration of the risk of SEAH. The process must document the controls already in place or to be implemented to reduce or remove risks.	Must meet the reporting requirements under their agreement, aligned to DFAT's PSEAH Policy.	X	✓	✓	✓
4. Effective PSEAH training in place.	PSEAH training for personnel, including downstream partners and individuals that deliver DFAT business.	Complete PSEAH training and provide evidence of this.	X	X	✓	✓
5. Recruitment and screening processes and employment practices address and manage the risk of SEAH.	Can demonstrate robust PSEAH recruitment and screening processes for all personnel/consultants including having in place appropriate and enforceable standards of conduct.	Based on a risk assessment, assurances could include providing a recent police check, working with vulnerable people check or location specific equivalent that provides assurance reasonable SEAH precautions have been taken. Local requirements must also be	X	X	✓	✓
6. Prohibit transactional sex for all personnel, while engaged in the direct delivery of DFAT business	Prohibits transactional sex in the field for all staff and downstream partners while engaged in the delivery of DFAT business	Employment agreements include clauses prohibiting transactional sex while engaged in the delivery of DFAT business.	X	X	X	✓

DFAT PSEAH Minimum Standards

Minimum standard	Obligation		Applies to			
	Organisations	Individuals	Low Risk	Med Risk	High Risk	Very High Risk
7. Prohibit fraternisation for all non-national personnel, while engaged in the direct delivery of the DFAT business	Prohibits fraternisation for all non-national personnel in the field while engaged in the delivery of DFAT business	Employment agreements include clauses prohibiting fraternisation for all non-national individuals while engaged in the delivery of DFAT business	X	X	X	✓