

PREVENTION OF SEXUAL EXPLOITATION, ABUSE & HARASSMENT (PSEAH) POLICY

Approved November 2023

1. POLICY STATEMENT

ADI places human rights at the centre of its work in Papua New Guinea and Australia. ADI recognises the serious obligation it holds to do everything possible to respect and protect the children and adults with whom it works. ADI is concerned to protect children, vulnerable adults, staff, which includes employees, directors and volunteers, from sexual exploitation, abuse and harassment.

The Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy sets out the expectations, systems and processes aimed at preventing sexual exploitation of other people we work with such as vulnerable adults and community members, as well as the systems and procedures that will ensure that incidents of sexual exploitation, abuse and harassment are identified and appropriate actions are taken in response to those incidents.

The Bullying, Discrimination and Harassment Policy relates to harassment within the workplace, between staff. The Harassment in the PSEAH policy relates to people outside the organisation who may be the target of harassment by staff of the organisation.

2. PURPOSE

Australian Doctors International (ADI) has a zero tolerance toward sexual exploitation, abuse and harassment and takes seriously all concerns and complaints/whistleblowing about sexual exploitation and abuse involving ADI paid and voluntary staff and contractors, board members, and primary stakeholders/community members.

All ADI staff share a responsibility to behave in accordance with the ADI and ACFID Codes of Conduct and PSEAH Policy including preventing and responding appropriately to concerns of sexual exploitation or abuse.

The continual review and improvement of this policy and its implementation is the responsibility of the ADI Safeguarding Working Group and the CEO. The ADI Safeguarding Working Group meets regularly and makes recommendations to the CEO.

3. SCOPE

This policy applies to all ADI personnel, representatives, and key stakeholders who work with ADI or on any ADI projects or programs, including board members, staff, volunteers, contractors, sub-contractors, consultants, partner staff.

4. DEFINITIONS

Sexual Abuse	Sexual abuse is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
Sexual Exploitation	Sexual exploitation is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
Sexual Harassment	A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favours, or engages in other unwelcome conduct of a sexual nature, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.
Transactional sex	is defined as the exchange of money, goods, employment or services for sex. ADI prohibits the purchase of sexual services and transactional sex.
Fraternisation	Any relationship that involves, or appears to involve, partiality, preferential treatment or improper use of rank or position including but not limited to voluntary sexual behaviour. It could include 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. ADI prohibits fraternisation for all non-national personnel in the field.

5. POLICY PRINCIPLES

ADI is committed to preventing sexual exploitation abuse and harassment (PSEAH) and through its interventions committed to reducing any forms of violence against women and their children.

In compliance with DFAT's PSEAH Policy, this policy is also underpinned by these following principles:

5.1 Zero tolerance of inaction

Sexual exploitation, abuse and harassment are never acceptable, and ADI has a zero tolerance to SEAH and transactional sex. ADI is committed to taking necessary appropriate actions across its programs and operations to ensure that all staff and partner staff adhere to the preventive measures and report and respond appropriately to any concerns raised with due regards to procedural fairness.

5.2 Strong leadership accelerates culture change

ADI acknowledges that strong leadership is essential for accelerating the pace of change. Leaders set organisational culture and strong leaders address SEAH by taking measures to improve diversity and inclusion.

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ADI management ensures that there are SEAH reporting and response process through this policy and the reporting procedures ensure that communities, victims/survivors and whistle-blowers when reporting concerns feel safe and are assured their allegations are taken seriously.

ADI promotes diversity, equality and inclusion through all its programs and operations which are embedded Gender Equity Policy and Disability Inclusion Policy, various organisation HR and operational policies which reduces incidences of SEAH.

5.3 Victim/survivor needs are prioritised

ADI is committed to taking a ‘Do No Harm’ approach when responding to any SEAH concerns which prioritises the rights, needs, and wishes of the victim/survivor, while ensuring procedural fairness to all parties. This approach:

- treats the victim/survivor with dignity and 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, or other characteristics
- consider the need for counselling and health services to assist the victim/survivor with their recovery.

5.4 Preventing Sexual Exploitation, Abuse and Harassment is a shared responsibility

ADI acknowledges that Preventing Sexual Exploitation, Abuse and Harassment is everyone’s responsibility.

Regular training on this policy and procedures for ADI staff and partners will ensure that everyone is aware of their roles and responsibilities in preventing, reporting and responding to concerns on SEAH that occurs during their engagement.

5.5 Gender inequality and other power imbalances are addressed

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.

ADI addresses other power imbalances by promoting the principle of ‘Nothing about us, without us’ through its collaboration with persons with disabilities and their Organisations for Persons with a Disability (OPDs).

5.6 Stronger reporting will enhance accountability and transparency

ADI acknowledges that sexual exploitation, abuse and harassment is a failure of responsibility and the shared responsibility in preventing SEAH.

ADI is committed to ensuring that all its staff and partner staff receive regular training on this policy and the reporting processes and procedures so that they know what, and who to report to and how to respond appropriately whenever SEAH concerns arise.

6. POLICY IN ACTION

ADI acknowledges that PSEAH is a shared responsibility and, is committed to ensuring that all its staff and partner staff receive regular trainings on this policy and procedure to

understand their roles and responsibilities in prevention, reporting and responding whenever a SEAH concern arise taking into consideration the 'Do No Harm' approach.

6.1 Roles and Responsibilities

Role	Responsibility
Board	<ul style="list-style-type: none"> • Manage PSEAH and Child Safeguarding risks and ensure organisation is putting appropriate controls in place. • Comply with ADI's Code of Conduct and PSEAH Policy
Senior Executives	<ul style="list-style-type: none"> • Ensure safeguarding questions are included during interviews • Ensure clauses on prohibition of transactional sex and fraternisation are included in relevant staff employment or engagement contracts • Monitor and ensure compliance with ADI Code of Conduct, Safeguarding Code of Conduct and PSEAH Policy • Ensure all new staff are properly trained and informed on ADI PSEA policies and procedures during induction • Ensure all staff receive PSEAH policy refresher training each year • Conduct PSEAH screening and risk assessment of partners • Undertake PSEAH risk assessment as part of program design • Monitor PSEAH risks during program implementation. • Ensure safe reporting and response processes are in place for cases of SEAH. • Report suspected or known instances of harm or abuse to authorities in line with our procedures • Report to DFAT, other donors and authorities any PSEAH incidences as required by contractual partnership and funding agreements. • Ensure that stakeholders and partners understand and adhere to ADI PSEAH Policy, and this is included in MOU's and Project Agreements
Employees	<ul style="list-style-type: none"> • Comply with ADI's Code of Conduct, Safeguarding Code of Conduct and PSEAH Policy • Be alert to any SEAH risks • Identify and seek continued understanding of PSEAH through training • Ensure incidents that breach the PSEAH Policy and Safeguarding Code of Conduct are reported and recorded through the Safeguarding Reporting and Response Procedure
Partner organisations	<ul style="list-style-type: none"> • Comply with screening and risk assessment at commencement and over the life of the partnership • In absence of Partners own PSEAH Policy, partner will sign and comply with ADI's PSEAH Policy and Partner Code of Conduct • Report all safeguarding risks, concerns and incidents to ADI

6.2 Recruitment

ADI takes all reasonable precautions to ensure that staff, directors, volunteers and interns do not pose unacceptable risk to vulnerable adults in their line of work.

As outlined in ADI's Recruitment Policy, ADI will consistently apply robust recruitment procedures for all staff, including:

- Criminal record check
- At least two verbal reference checks
- Behavioural-based interview questions
- Clauses on prohibition of exploitative transactional sex and fraternization are included in the relevant employment or engagement contracts.

ADI's statement on PSEAH is stated in all job descriptions and Employment contracts and job advertisements.

6.3 Education and Training

Training on ADI's Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) policy is mandatory during the induction of all new ADI staff and refresher/updated training is conducted on a regular basis. Staff attendance at these trainings is recorded in ADI's training register.

ADI also delivers PSEAH training to partner staff working with ADI, through pre-patrol briefings and regular training on Child Safeguarding and PSEAH policies. Partner staff are required to sign the ADI Program and Project Activities Code of Conduct and receive a copy of Child Protection Professional Behaviour (Appendix 1 of Child Safeguarding Policy) after these trainings.

All ADI staff and volunteers are also required to attend ACFID Child Safeguarding and ACFID Code of Conduct on-line training.

ADI also provides refresher training on the policy and procedures for all staff and volunteers during which they are reminded about their roles and responsibilities and the Child Protection Professional Behaviour.

ADI APPROACH TO SAFEGUARDING

<p>Prevention</p>	<ul style="list-style-type: none"> • All ADI programs will ensure a SEAH risk assessment is conducted and DFAT Minimum Standards are applied to commensurate the level of risks. • All ADI staff and partner staff will undergo training on this policy to understand their roles and responsibilities on PSEAH. ADI Staff also undergo ACFID Code of Conduct and Introduction to Safeguarding online trainings • All ADI Staff and partner staff sign ADI Safeguarding Code of Conduct and Partner Code of Conduct respectively.
<p>Reporting</p>	<p>PSEAH is a shared responsibility and so ADI emphasises that all ADI staff, partner staff and community members have a responsibility to report any SEAH concerns as soon as possible following the appropriate processes and procedures.</p> <p>Reporting SEAH concerns:</p> <ul style="list-style-type: none"> • All concerns on SEAH must be reported confidentially within 24 hours following the appropriate processes and procedures as outlined in ADI Safeguarding Reporting and Response Procedure. • All ADI staff and partner staff who becomes aware of concerns of SEAH should report the matter to an ADI Manager/CEO as outlined in ADI Safeguarding Reporting and Response Procedure • Any ADI staff needing further advice should contact the National GEDSI Coordinator or email safeguarding@adi.org.au • The process for receiving and managing SEAH concerns under this Policy will be according to ADI's Safeguarding Reporting and Response Procedure and in compliance with the Complaints Policy • ADI CEO or delegated person will report all alleged SEAH incidents using the DFAT Sexual Exploitation, Abuse and Harassment Incident Notification Form (www.dfat.gov.au/pseah) and email to seah.reports@dfat.gov.au following DFAT's Safeguarding Reporting Procedure. <p>Responding to SEAH concerns:</p> <ul style="list-style-type: none"> • CEO/Senior Managers will initiate a rigorous investigation implementing ADI's Complaints Policy and Procedure once any situation that indicates a possible violation of this policy and will also take appropriate disciplinary action. • Taking a survivor-centred approach, ADI will refer both the survivor and the perpetrator to the relevant service providers to seek professional support. • CEO/Senior Manager is responsible for implementing ADI's Complaints Policy and Procedure and ensuring this is accessible for reporting any instances of Sexual Exploitation, Abuse or Harassment. • ADI CEO or delegated person will report all alleged SEAH incidents using the DFAT Sexual Exploitation, Abuse and Harassment Incident Notification Form (www.dfat.gov.au/pseah) and email to seah.reports@dfat.gov.au