Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) **policy**

FemilPNG Australia (FPNGA) is an Australian not-for-profit that works in partnership to prevent and respond to family and sexual violence (FSV) and sorcery accusation-related violence (SARV) in Papua New Guinea (PNG).

FPNGA is a rights-based organisation; we all have the right to a life free of FSV and SARV. Our work is focused on creating and sustaining change, building and maintaining partnerships and on supporting locally-led development.

1. Statement of FemiliPNG Australia's commitment to the prevention of sexual exploitation, abuse and harassment (SEAH)

FPNGA is committed to taking all necessary steps to ensure that everyone with whom we work (both in Australia and overseas in our development programs) are provided with a safe, inclusive and respectful environment. FPNGA has zero tolerance of inaction, slow or inadequate responses to suspected, reported or actual breaches of this Policy.

Anyone, at any time can report a SEAH concern, raise an issue or get in touch with us by email report@femilipngaus.org, or through our website https://femilipngaus.org/making-a-complaint/

2. Purpose of the Policy

The primary purpose of this Policy is to minimise the risk of SEAH in our workplace, work and projects, and in our partnerships.

In addition, this Policy seeks to:

- Create an open and aware environment where concerns related to SEAH can be raised and managed in a fair and just manner, which promotes the rights of all
- Demonstrate FPNGA's commitment to risk minimisation through measures such as training, staff awareness, appropriate recruitment processes, risk assessments, and leadership
- Provide guidance on responding to concerns and allegations of SEAH and/or policy non-compliance

3. Guiding principles

3.1 We have zero tolerance of inaction

SEAH is never acceptable. Zero tolerance of inaction means investigating acting on every allegation of SEAH involving FPNGA Personnel, Representatives or Partners. All allegations will be addressed in line with procedural fairness.

3.2 We prioritise the needs of the victim/survivor

Action to address SEAH are underpinned by a 'do no harm' approach prioritising the rights, needs, and wishes of the victim/survivor, while ensuring procedural fairness to all parties. This approach:

- Balances due process with a focus on the safety and wellbeing of the victim/survivor
- Respects the choices, wishes, rights and dignity of the victim/survivor
- Considers appropriate access to counselling and health services for the victim/survivor
- Ensures the victim/survivor is informed about the progress and outcome of the investigation
- Protects privacy and confidentiality.

3.3 We prioritise human rights and empowerment

FPNGA's values mean that we support the basic human rights and central role of women within their community and in development. We actively seek opportunities to empower women and children and other marginalised and/or vulnerable groups in PNG. FPNGA is committed to addressing the vulnerability and discrimination that creates unequal power dynamics and enables abuses of power.

3.4 We value our people

Preventing SEAH is a shared responsibility. For this Policy to be effective, all Personnel and Representatives are obliged to create and promote an environment which prevents SEAH.

FPNGA is responsible for:

- Building the capacity of Personnel through training and staff awareness
- Committing to appropriate recruitment and performance management processes.

3.5 We have strong leadership

Strong leadership is essential in shaping organisational culture and addressing SEAH. Effective leaders take action to reduce gender inequalities, address power imbalances, and promote diversity and inclusion. At FPNGA, this commitment is demonstrated through:

- Gender balance at the Board level
- Appointment of a Safeguarding Focal Person
- Inclusion of SEAH risks in the organisational risk register
- Strong, actionable human resource procedures that embed gender equality.

3.6 We report allegations

Reporting mechanisms are key to accountability and transparency. FPNGA Personnel, Representatives and Partners must meet reporting requirements to foster trust, and to ensure all SEAH allegations are exposed, investigated, and appropriately handled.

4. Definitions

Personnel	A FPNGA staff member, contractor, or volunteer
Representative	A FPNGA Board member
Partner	An external entity FPNGA has documented partnership agreements for the implementation of development activities.
Sexual exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from sexual exploitation of another.
Sexual abuse	The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual offences including but not limited to attempted rape (which includes attempts to force someone to perform oral sex); and sexual assault (which includes non-consensual kissing and touching). All sexual activity with someone under the age of consent is considered to be sexual abuse.
Sexual harassment	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 any gender towards any person of any gender. Sexual harassment can be perpetrated against project participants, community members, citizens, as well as staff and Personnel.
Victim/survivor	A person who is, or has been, sexually exploited, harassed or abused.

5. Scope of this policy

5.1 This Policy applies to all FPNGA Personnel and Representatives at all times, including when they are not directly representing FPNGA.

5.2 The obligations of this Policy are mandatory for all FPNGA Personnel and Representatives. All Personnel and Representatives are also required to sign the Code of Conduct (TOOL-001), which affirms their acknowledgment of these obligations.

5.3 This Policy applies to Partners who have agreed to acknowledge, adopt, or comply with it, as outlined in a partnership agreement, contract or memorandum of understanding.

5.4 FPNGA will promote the principles of this Policy to Partners, donors and other stakeholders.

5.5 This Policy will be publicly available on the FPNGA website.

6. Code of Conduct

6.1 FPNGA's Code of Conduct is designed to protect children, vulnerable adults, Personnel, Representatives and the organisation by setting clear behavioural expectations and guidelines.

6.2 All FPNGA Personnel, Representatives and applicable Partners (as outlined in clause 5.3) are required to sign and comply to the Code of Conduct at all times. Failure to do so may result in disciplinary action.

7. Policy implementation

SEAH and risk

7.1 Due to the vulnerability of the target demographic FPNGA engages with, SEAH is considered a high-risk. This risk is recorded in FPNGA's Organisational Risk Register and is monitored by the CEO and Board.

7.2 SEAH risks are assessed during each project design to ensure that appropriate controls are in place, proportionate to the level of risk. Any high residual risk be escalated to the Board for ongoing monitoring.

Training and awareness

7.3 All FPNGA Personnel and Representative will be inducted to this Policy and the expected behaviours outlined in the Code of Conduct.

7.4 FPNGA staff and Representatives will receive training in the prevention of SEAH and will attend refresher training as required, particularly following amendments to this Policy.

7.5 FPNGA staff and Representatives will participate in regular reviews of this Policy.

7.6 FPNGA may provide training and awareness-raising sessions on this Policy to Partners and other stakeholders upon request.

7.7 Evidence of training and/or awareness raising activities will be documented and maintained for accountability and compliance purposes.

Recruitment and performance management

7.8 FPNGA recruitment processes must prioritise the prevention of SEAH. Safe recruitment includes reference checks and vetting for any history of misconduct.

FPNGA's Recruitment Policy (POL-023) and Procedure (PROC-004) aims to support staff to recruit the safest and most suitable people to work with us. The Policy and Procedure must be referred to before commencing recruitment.

7.9 Regular reviews of FPNGA registers and systems – including staff documentation (e.g. criminal record checks), the training register, and the Organisational Risk Register are required to ensure all records remain up to date.

7.10 Partners are invited to provide feedback on the performance of FPNGA staff during the annual performance review process, including raising any behavioural concerns.

8. Responsibilities

8.1 Chief Executive Officer (CEO) / SEAH Focal Point

The SEAH focal point is the CEO. Responsibilities include:

- Leading awareness-raising on SEAH measures, including the Code of Conduct and reporting mechanisms, and providing related training and advice to Personnel, Representatives and Partners.
- Coordinating, supporting, and advising on the development and implementation of this Policy.
- Providing clear guidance to Personal, Representatives and Partners on how to report allegations of SEAH.
- Receiving SEAH reports, responding in accordance with FPNGA's procedures, and advising on appropriate next steps or referrals.
    - *Note: If the report relates to the CEO / SEAH Focal Point, please refer to the Prevention of SEAH Procedure (PROC-011)*
- Coordinating agreed actions and referrals to support victim/survivors.
- Providing regular updates to the FPNGA Board on the implementation of SEAH measures.

8.2 The Board

The responsibilities of the Board include:

- Reviewing and approving this Policy regularly.
- Participating in safeguarding training and refresher courses.
- Review quarterly SEAH updates (as reported in the CEO report to the Board) and discuss as needed.
- Monitoring SEAH risks in the Organisational Risk Register.
- Ensuring implementation and periodic review of the PSEAH Policy.

The responsibility of the Board Chair include:

- Receiving reports of SEAH, responding in accordance with FPNGA's procedures and advising on referrals or next steps.
    - *Note: If the report relates to the Board Chair and/or CEO / SEAH Focal Point, please refer to the Prevention of SEAH Procedure (PROC-011)*

8.3 Personnel

The responsibilities of FPNGA Personnel include:

- Understanding and complying with this Policy and the Code of Conduct.
- Reporting any suspected or actual incident of SEAH or Policy non-compliance.
- Participating in awareness-raising and training sessions related to this Policy.
- Acknowledging that breaches of this Policy may result in disciplinary action.

8.4 Partners

The responsibilities of Partners include:

- Acting in accordance with the principles and reporting requirements as set out in this Policy.
- Monitoring SEAH-related risks in the projects they are involved in.

9. Policy amendments

All policies are subject to review and endorsement by the FemiliPNG Australia Board. Suggestions about this Policy are welcome and should be directed to the CEO. Any amendments or changes to the Policy will be submitted to the Board for endorsement.

The CEO is responsible for maintaining this document, including updating confirmed changes, informing staff of the changes, and disseminating the latest version to all Personnel.

This policy will be reviewed every three years, or as needed to meet governance obligations and/or changes in legislation.

10. Related documents

Document number	Document name
PROC-011	Prevention of Sexual Exploitation, Abuse and Harassment Procedure
POL-001	Child Safeguarding Policy
POL-004	Complaints Handling Policy
POL-010	Gender and Diversity Policy
POL-013	Privacy Policy
POL-017	Whistleblowing Policy

POL-023	Staff Recruitment Policy
TOOL-001	Code of Conduct
PROC-004	Staff Recruitment Procedure
PROC-008	Child Safeguarding Procedure