

1. Purpose of the policy

FemiliPNG Australia (FPNGA) does not tolerate sexual exploitation, abuse, or harassment (SEAH) of any kind. SEAH is a violation of basic human rights and is in contradiction to FPNGA's values. FPNGA aims to provide a safe environment that safeguards everyone from SEAH including partners, staff, and volunteers.

FPNGA supports its partner Femili PNG to work with clients, partners, and communities to improve responses to family and sexual violence (FSV) through case management, partner support, training, monitoring, research, and advocacy. Our primary stakeholders include Femili PNG staff and clients on the ground, and we are committed to protecting and supporting them.

FPNGA recognises that the nature of our work places our staff in positions of trust in relation to people who are especially vulnerable. In acknowledgement of this, FPNGA staff are obliged to uphold high standards of workplace conduct and not use their positions to exploit or abuse others.

FPNGA will actively prevent and respond to SEAH, through maintaining an organisational culture that promotes respect and prioritises safeguarding against SEAH. Clear expectation will be set in relation to staff conduct, and pathways to ensure all staff, partners and other stakeholders are aware of how to report allegations of SEAH.

The purpose of this Policy is as follows:

- a. To outline FPNGA's zero tolerance approach to SEAH.
- b. To prevent SEAH through a range of measures including training and staff awareness, recruitment processes, risk mitigation and controls, and leadership.
- c. To set out the reporting requirements and investigation processes for allegations of SEAH.

2. Policy application

This Policy applies to all staff, volunteers, board members, contractors, and representatives of FPNGA and anyone acting on behalf of the organisation. For the sake of brevity, the term "staff" will be used to represent the scope of this Policy. All staff are expected to read, understand, and comply with all aspects of this Policy.

This Policy also applies to partners who have agreed to acknowledge, adopt, or comply with this Policy.

3. Definitions

Personnel	A FemiliPNG Australia staff member, contractor, or volunteer
Representative	A FemiliPNG Australia Board member
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

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	consent (in the law of the host country or under Australian Capital Territory law being 16 years of age, whichever is greater) 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 beneficiaries, community members, citizens, as well as staff and personnel.

4. Policy principles

The following principles underpin FPNGA's prevention of SEAH

- **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 pursue opportunities to empower women and children and other marginalised people in PNG.
- **We safeguard the vulnerable:** FPNGA's partner, Femili PNG, primarily works with survivors of FSV who are particularly vulnerable to SEAH. FPNGA works with Femili PNG to put their clients first and always prioritise their protection, care, and support.
- **We expect certain behaviours from those representing FPNGA:** Cultivating trust is important for FPNGA's work in supporting Femili PNG's staff to develop new skills and to assist in driving Femili PNG's organisational development. Staff will conduct themselves in a professional manner and always adhere to the workplace Code of Conduct to foster this trust. FPNGA will work to combat situations of vulnerability and discrimination which creates unequal power dynamics and the requisite environment for abuses of power to exist.
- **We have zero tolerance of SEAH:** All allegations of SEAH by staff or partners will not be tolerated and will be taken seriously. FPNGA will immediately respond to any allegations, respond, report, and investigate. Engaging in acts of sexual exploitation and abuse are grounds for summary dismissal of FPNGA staff.
- **We will take action to prevent SEAH:** FPNGA aims to prevent SEAH by training and staff awareness, appropriate recruitment and performance management processes, and implementation of this Policy. We have strong leadership to address gender inequalities and power imbalances.
- **We report accusations:** Reporting mechanisms enhance accountability and transparency in our organisation. FPNGA will meet the reporting requirements of our 6 partners to foster trust and accountability, and ensure that all allegations of SEAH are exposed, investigated, and properly handled.

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5. Policy and procedures

This Policy will consider risk management and mitigation of SEAH, expected behaviours of FPNGA staff, risk management, training and awareness, recruitment, and performance management.

5.1 SEAH and risk

- The risk of SEAH is included in FPNGA's organisational Risk Assessment. Due to the vulnerability of people that FPNGA works with, SEAH is considered high risk.
- Appropriate risk mitigation measures will be put in place such as the further development and implementation of this Policy.

5.2 Expected behaviours

- FPNGA staff and volunteers are required to always conform with the expected behaviours in the Code of Conduct.
- Fundamental to FPNGA's support of Femili PNG is respect for dignity and basic human rights of survivors of FSV and building local organisational and staff capacity. Every person who represents FPNGA is expected to reflect these values in their professional conduct.
- All forms of sexual exploitation, abuse, and harassment by FPNGA staff, volunteers and partners are expressly prohibited.
- Exchange of money, employment, goods or services for sex, including sexual favours or other forms of exploitative behaviour is prohibited. This includes the exchange of assistance that is due to beneficiaries.
- Sexual relationships between FPNGA and Femili PNG staff and clients are prohibited since they are inappropriate and based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of our work.
- If a FPNGA staff member develops concerns or suspicions regarding SEAH by another staff member, partner, or stakeholder, he or she must report such concerns as per the procedure outlined in this Policy. Femili PNG staff and other stakeholders are also encouraged to report any concerns about FPNGA staff.
- FPNGA will create and maintain an environment which prevents SEAH and promotes our code of conduct. Staff at all levels have responsibility to support and develop a safe environment.
- Fraternisation is prohibited while in the field and engaged in the delivery of FPNGA business.

5.3 Training and awareness

- All FPNGA staff will be trained in the prevention of SEAH and take part in regular reviews of this Policy.
- New FPNGA staff will be acquainted with this Policy on induction.
- FPNGA may provide training and awareness-raising sessions on this Policy to partners and other stakeholders on request.

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5.4 Recruitment and performance management

- FPNGA recruitment processes always consider the prevention of SEAH by ensuring that all references are checked, and a national police check occurs before an offer of employment is made.
- Femili PNG management will be invited to provide feedback on the performance of FPNGA staff during the annual performance review process, including raising any behavioural issues or concerns.
- As per the FPNGA HR manual, SEAH is grounds for summary dismissal.

5.5 SEAH focal points

- The focal point for SEAH will be the FPNGA CEO and FAO.
- The responsibilities of the SEAH focal points are to:
 - Take a lead role in raising awareness about the organisation's SEAH measures including the Code of Conduct and provide training and advice to staff and volunteers on these measures.
 - Work with staff to ensure that operations are integrating SEAH measures into all activities.
 - Ensure that partners and stakeholders are aware of FPNGA's SEAH measures and their right to protection including how they would raise a concern about SEAH.
 - Receive reports of SEAH, responding in accordance with FPNGA's procedures and providing referral or next step advice.
 - Assist in investigating reported SEAH incidents, where appropriate.
 - Discuss subsequent action required, to ensure the safety and welfare of individuals in cases of SEAH caused by FPNGA.
 - Liaison between staff and managers to access technical support in particular in regards to complex SEAH issues.
 - Coordinate regular reports to the FPNGA Board on the implementation of SEAH measures.

6. Reporting and responding

6.1 Allegations of sexual exploitation, abuse, and harassment

- All allegations of SEAH must be reported immediately to the SEAH focal points being the FPNGA CEO or Finance Officer. Reports can be made verbally, in writing, and or via email. Allegations can be made confidentially.
- The FPNGA CEO will provide oversight of the investigation and reporting process and will report to and engage the Board in the process.
- All allegations of SEAH will be taken seriously and investigated as per the procedures outlined below.
- When an allegation is made, the needs of the complainant are prioritised. Their safety and wellbeing is paramount and their information is treated confidentially.
- FPNGA will also protect whistle blowers during the reporting and investigation process, which includes protecting the identity of the reporter and preventing any harm to the reporter from FPNGA or employee of FPNGA.
- In the event of a SEAH allegation against the FPNGA CEO, complaints should be made directly to the FPNGA Board through the Chair: stephen.howes@anu.edu.au. The Board will assign a member to investigate and report on the claims.

If allegations of SEAH are reported to other staff members, such as through the complaints process, they must be reported to the SEAH focal points immediately.

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6.2 Reporting requirements

- As part of FPNGA's zero tolerance approach to SEAH, and our obligations as a DFAT funding recipient, we will undertake two kinds of incident reporting:
 - Mandatory and immediate (within two working days of becoming aware of an alleged incident) reporting by all staff and DFAT partners of any alleged incident of SEAH related to the delivery of DFAT business. This includes any alleged incident that poses a significant reputational risk to DFAT. For example, an allegation against a senior staff member of a partner organisation.
 - Mandatory reporting (within five working days) by all staff and DFAT partners of any alleged non-compliance with this Policy for example, failure to adhere to the SEAH Policy Minimum Standards or principles.
- If in doubt, FPNGA will report an alleged incident, noting that individuals and organisations found not reporting alleged incidents will be viewed as being non-compliant.
- Reports of abuse or exploitation of individuals under the age of 18 years must also be reported in line with the reporting requirements specified in the FPNGA Child Protection Policy.
- FPNGA will report all alleged SEAH incidents to DFAT using the DFAT Sexual Exploitation, Abuse and Harassment Incident Notification Form (www.dfat.gov.au/pseah) and emailed to seah.reports@dfat.gov.au.
- Where safe to do so, and when in accordance to the wishes of the victims, complainants and whistle blowers, all alleged SEAH incidents that involve a criminal aspect shall be reported through the correct local law enforcement channel

6.3 Investigation and response

Investigations into allegations of SEAH will be conducted in accordance with the following principles:

- Investigations will be carried out in a manner that is timely, fair, objective and as far as practicable, confidential.
- Interviewing for the investigation will be carried out in an appropriate manner.
- All information and evidence gathered during the investigation will be held securely and in the strictest confidence.
- All participants within the investigation process will be afforded due process and the right to appeal any decision made.
- Sensitive information relating to reports of SEAH will be shared only with authorities and law enforcement when a notification must be made.

6.4 Complaint-centred approach

In line with our values, FPNGA will adopt a complainant-centred approach in preventing and responding to SEAH. This involves:

- Balancing due process with an approach that prioritises the complainant's safety and well-being.
- All actions are guided by respect for choices, wishes, rights and dignity of the complainant.
- Complainants will be offered counselling services if appropriate and otherwise assisted to seek help.
- Complainants will be provided with information on the progress of the investigation and the outcome.

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7. Partners and others

7.1 Extending to partners

FPNGA will work with partner organisations in the prevention of SEAH and will advise them of the avenues available to report concerns regarding SEAH. This will include:

- Making copies of this Policy publicly available.
- Providing training to partners on this Policy.
- Making explicit FPNGA's zero tolerance approach to SEAH to partners
- Where possible, extending this Policy to partners through the use of Memorandum of Understandings and agreements.

7.2 Reporting of third parties

If FPNGA staff or management are informed of SEAH perpetrated against our partners or Femili PNG's staff or clients by staff or volunteers of other organisations, these allegations must also be reported to DFAT using the DFAT Sexual Exploitation, Abuse and Harassment Incident Notification Form set out in clause 6.2 above.

8. 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 FemiliPNG Australia 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.

9. Related documents

Document number	Document name
POL-001	Child Protection Policy
POL-010	Gender and Diversity Policy
POL-015	Human Resources Manual
TOOL-001	Code of Conduct

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