

Anglican Board of Mission – Australia

Policy A1009

Prevention of Sexual Exploitation, Abuse and Harassment

Approved by the ABM Board 11 September, 2020
To be reviewed no later than 2022

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CONTEXT

The Anglican Board of Mission, Australia (ABM) is the mission agency of the Anglican Church of Australia, and works both in Australia and overseas through Anglican Church and ecumenical partnerships.

ABM's mission is to help the Anglican Church and the wider community realise and respond to the call for each of us to be part of God's hope for the world.

ABM's vision is that it wants to see people everywhere experience the wholeness of life God offers in Jesus Christ and to this end support our *Partners* as they participate in God's mission.

ABM has identified the following values as guiding all aspects of its work:

- i. Faithfulness to God;
- ii. Integrity in all aspects of our work;
- iii. Respect for the created order and human dignity;
- iv. Wise Management of our resources;
- v. Creativity and hard work; and
- vi. Relational reciprocity.

ABM is also a member of the Australian Council for International Development (ACFID) and, as such, is committed to full adherence to the principles and obligations of ACFID's Code of Conduct, including those relating to preventing *Sexual Exploitation, Abuse and Harassment*¹. (referred to collectively as *SEAH*). ABM seeks to contribute to the creation of an environment where *SEAH* does not happen.

ABM is strongly committed to *Safeguarding* all its *Personnel*, *ABM Representatives*, and all with whom it works, both in Australia and overseas, from all forms of *SEAH*.

¹ All words italicised in this policy are words that are defined under "Definitions".

Furthermore, ABM receives some of its funding from the Australian Government Department of Foreign Affairs and Trade (DFAT), and is committed to complying with all policies in relation to acceptance of such funding, including their *Prevention of Sexual Exploitation, Abuse and Harassment [PSEAH] Policy*.

PURPOSE

In the light of ABM's values, the purpose of this Policy is to outline ABM's strong commitment to protection from *SEAH* of any *ABM Personnel* and *ABM Representatives*, and those with whom ABM works, both in Australia and overseas. The purpose is also to prevent *SEAH* being perpetrated by any *ABM Personnel* or *Partners*, and to outline what processes are to be followed in the event of a *Complaint* being made to ABM about *PSEAH*.

ABM's policy takes an approach which sees total prevention of *SEAH* as the ideal, but which also includes the protective mechanism of a *Victim/Survivor-centred approach* to ensure all *Complaints* and reports about breaches this policy will be dealt with by ABM in a timely and effective way.

SCOPE

This Policy applies to all *ABM Personnel*, *ABM Representatives* and to those with whom ABM has partnered to engage in activities using ABM funding.

Because much of ABM's work takes place in a context of partnership, ABM will make strong efforts to ensure that its *Partners* are also sensitised to the issue of *Safeguarding* in all its forms, including against *SEAH*, and that the communities with whom ABM and its *Partners* work are likewise sensitised, protected, and know their rights to make a *Complaint* and how to do so.

The ABM Board will take leadership in *Safeguarding*, and will review *Safeguarding* risks on a regular basis. All incidents of breaches of *Safeguarding* will be reported to the Board.

The policy applies both within the ABM organisation and in any activity in which any *ABM Personnel* or *ABM Representatives* are involved in representing ABM, both in Australia and overseas (including all time spent in-country because of the ABM activity/ies). Whilst recognising that the context of *Humanitarian Response* produces additional risks in this area, the policy applies to *Community Development* contexts as much as to *Humanitarian* ones.

Because *SEAH* takes place most often in a context of gender inequality, ABM has strengthened its *Gender Policy* to ensure it applies not just in to its *Development* and *Humanitarian* work, but also within the organisation as a whole.

Tables 1 and 2 show the various ABM documents that, taken together, cover the full mechanisms for implementing this Policy throughout the organisation and its activities. Table 1 also includes reference to the parts of the ACFID Code of Conduct and DFAT *PSEAH Policy* that ABM's *PSEAH Policy* (and related policies) seek to comply with.

POLICY

A. Leadership and Values

- 1 ABM is committed to exercising leadership in ensuring its *Partners*, their communities and *ABM Personnel* and *ABM Representatives* are protected against *Sexual Exploitation, Abuse and Harassment (SEAH)*. ABM sees *SEAH* as an abuse of human rights. ABM seeks to demonstrate its commitment by promoting a culture of zero tolerance of *SEAH* within ABM and its *Partners*, and zero tolerance of the cultures which enable *SEAH*. This culture of zero tolerance will be reflected in ABM's *Code of Personal Conduct* which is signed by all *ABM*

Personnel. This *Code* includes reference to child *Safeguarding* behaviours, prevention of *SEAH*, *Transactional sex* and *anti-Bullying*, and an obligation on *ABM Personnel* to report all actual or suspected cases of *Misconduct*.

- 2 ABM takes a *victim/survivor-centred approach* to preventing sexual exploitation, abuse and harassment and to all stages in the *Complaints-handling* process, including any ongoing needs for protection and counselling/support.
- 3 ABM commits to preventing a person from commencing work with ABM if they pose an unacceptable risk in terms of *SEAH*. In its contractual arrangements with *Partners*, ABM requires *Partners* to ensure that their own *Safeguarding* policies and procedures comply with these standards, and that *Partner* staff, their volunteers and project visitors comply with these standards.
- 4 Breaches of this *PSEAH* Policy may result in serious sanctions. ABM's Workplace Guidelines and contracts contain provisions for dismissal for any employee or volunteer who breaches the Workplace Guidelines or ABM's *Code of Conduct*.
- 5 ABM recognizes that *SEAH* are deeply rooted in gender inequality, discrimination, and power imbalances, and is therefore committed to promoting gender equality within ABM, and within ABM's *Partners*, and the communities with which they work.
- 6 ABM recognises that some groups of people are more vulnerable to *SEAH* than others. This may be due to race, religion, ethnicity, indigeneity, disability, age, displacement, caste, gender, gender identity, sexuality, sexual orientation, poverty, class or socio-economic status. ABM particularly acknowledges that women and girls, children, people with a disability, LGBTQI+ people and displaced persons are at a higher risk of *SEAH*. People's vulnerability to *SEAH* can change with circumstances which can often be exacerbated, and likewise ameliorated, by development activities and humanitarian responses over which ABM and its partners have some control. Where a parent is a *Victim/Survivor* of *SEAH*, their children can also be more vulnerable to abuse. Thus there is a strong link between this policy and ABM's Child Protection Policy.
- 7 ABM affirms its commitment to the Core Humanitarian Standard (<https://corehumanitarianstandard.org/the-standard>) and its Guidance Notes and Indicators.
- 8 ABM affirms its commitment to preventing *SEAH*, and abuse of power more broadly, in the aid community in all its forms, and to holding perpetrators accountable, while realizing the commitment to "do no harm" by protecting the dignity and well-being of *Victims/Survivors* and *Whistleblowers*, and ensuring that beneficiaries are at the centre of ABM's work and can safely access assistance. Specifically, ABM is committed to protect communities with whom it works, ABM's *Partners*, *ABM Personnel* and *ABM Representatives* from *SEAH*.
- 9 ABM affirms that preventing *SEAH* is a shared responsibility, and therefore ABM will work with its *Personnel*, *Partners* and communities to challenge attitudes which permit or excuse *SEAH*, both internally and within its program activities.
- 10 ABM will ensure widespread knowledge of this policy, including by posting on its website ([https://www.abmission.org/data/About/Policy Documents/A1009 Prevention of Sexual Exploitation Abuse and Harassment Policy July 2019.pdf](https://www.abmission.org/data/About/Policy_Documents/A1009_Prevention_of_Sexual_Exploitation_Abuse_and_Harassment_Policy_July_2019.pdf)).
- 11 ABM will include "Gender & *Safeguarding*" expertise as desirable skills when recruiting to its governing bodies.

12 ABM has appointed a *Safeguarding Focal Person*.²

B. Recruitment

13 All ABM's position descriptions, recruitment advertisements and tender documents will include ABM's commitment to *PSEAH*, Child Protection and the *ABM Code of Conduct*.

14 Job interviews will contain scenario-based questions on *PSEAH*, as well as Child Protection, for all relevant positions, and any gaps in employment history will be checked. ABM will not employ people whom it has reason to believe have breached the *PSEAH* and/or Child Protection aspects of ABM's Code of Conduct.

15 At least two references will be taken from previous employers which include questions on the candidate's conduct and behaviour.

16 *SEAH* will be included in ABM's police checks at recruitment and at regular intervals during the person's time of service at ABM.

17 ABM's employment and consultancy contracts will include this *PSEAH* policy, ABM's Child Protection policy and the *ABM Code of Conduct*.

C. Induction, Training, Travel Briefings and Performance Management

18 *ABM Personnel* will receive training in *PSEAH* and in ABM's Code of Conduct, upon induction and at regular intervals (at least annually) during their time with ABM. This training will include, but not be limited to, identifying, reporting, investigating, documenting and managing *SEAH* incidents. Training will also include ABM's commitment to the rights of women and the rights of LGBTI+ people both within ABM and among those with whom ABM works (see ABM's *Gender Policy*). Training will also include *Bystander* responsibilities (see ABM's *Whistleblower Policy*).

19 Pre-travel briefings, conducted prior to *ABM Personnel* making visits to ABM's *Partners*, will include scenario-based discussions on power imbalances, status and workplace cultures that can impact on work and personal relationships.

20 Post-travel briefings of *ABM Personnel* will include attention to the psychological welfare of the *ABM Personnel*.

21 ABM will include a discussion of *PSEAH* and the *ABM Code of Conduct* in staff annual reviews, including reminders regarding *Whistleblower* obligations, and provision of opportunities for staff to raise concerns.

22 ABM will also provide (either directly or via third party trainers) training to its partners in *PSEAH*, and ensure that partner Personnel receive induction and annual refresher training.

D. Complaints Procedure

23 All incidents (suspected, alleged or proven) of *SEAH* must be reported to ABM within two working days of ABM Personnel or ABM Representative becoming aware of the incident. ABM is obliged to report such incidents to DFAT within two working days if the incident occurs within a DFAT-funded project.

² For description of the work of the *Safeguarding Focal Person*, see *ABM Safeguarding Focal Person: Duties and Responsibilities*

- 24 All incidences of non-compliance to ABM's or a Partner's *PSEAH* policy must be reported to ABM within five working days. ABM is obliged to report any policy non-compliance to DFAT for any Partners or projects which receive DFAT funding through ABM, within five working days of the *ABM Personnel* or *ABM Representative* becoming aware of the policy non-compliance.
- 25 Incidents of SEAH against a person under 18 come under the scope of ABM's *Child Protection Policy*.
- 26 *Complaints* are handled via ABM's *Complaints and Critical Incidents Handling Procedures* which include a mechanism for identifying critical incidents, such as breaches of this *PSEAH* Policy, breaches of ABM's *Child Protection Policy*, incidents of fraud and other forms of *Misconduct*, details of investigation timeframes and an incident notification form. ABM has also developed a simple guide to assist with reporting: '*Sexual Exploitation, Abuse and Harassment Reporting Steps*'.
- 27 Once reported, all critical incidents will be escalated to a specific critical incidents track. ABM's *Complaints and Critical Incidents Handling Procedures* and its *Whistleblower Policy* embody the following principles:
- ABM's commitment to zero tolerance of *SEAH*
 - *Bystander* obligations (it is mandatory for *ABM Personnel* or *ABM Representatives* to report a suspected, alleged or actual incident of *SEAH* to ABM)
 - *Victim/Survivor-Centred Approach*
 - confidentiality
 - timeliness
 - Anonymity in reporting for *Victims/Survivors* who request this or whose safety requires this.

(See ABM's *Whistleblowing Policy* and *Complaints and Critical Incidents Handling Procedure*. Reports concerning *SEAH* will normally be made through ABM's *Safeguarding Focal Person* to ABM's *Complaints Officer* in the first instance.)

- 28 If an *SEAH*-related *Complaint* originates in a country outside Australia, ABM will ensure it is adequately investigated.
- 29 At the conclusion of an investigation process, ABM will provide feedback on the results of the investigation to the *Complainant* (taking into account privacy provisions and needs of the *Victim/Survivor*).
- 30 ABM will ensure that, as part of its *Complaints and Critical Incidents Handling Procedures*, a process is in place for referring *Complaints* that come to ABM, but which do not fall within the scope of this Policy, such as *Complaints* against an employee of another organization.

E. Reporting SEAH Incidents and Policy Non-Compliance

- 31 All incidents of *SEAH* will be reported to police where laws have been broken or suspected to have been broken, including to *Partner* country law enforcement authorities (except where this is at odds with the wishes or welfare of *Victim/Survivor* or the life or serious welfare of the of the *Complainant* (SOC), and fair treatment of any *Subject of a Complaint*).
- 32 All incidents of *Sexual Misconduct*, even those that are dealt with informally, will be documented and reported to the ABM Board (via a standing '*Safeguarding*' agenda item),

taking into account wishes and welfare of *Victims/Survivors*.

- 33 All incidents of non-compliance to ABM's or a *Partner's PSEAH* Policy must also be reported to ABM's Board.

F. *Victim/Survivor Support and Reparations*

- 34 ABM will provide appropriate assistance for *Victims/Survivors*, such as access to legal and medical, social and financial services. ABM acknowledges that such support may need to continue after a *Victim/Survivor* has left the organisation.

G. *Discipline and Grievance*

- 35 ABM regards *SEAH* perpetrated by its *Personnel* as Serious Misconduct. ABM will respond to all allegations of *SEAH* it receives regarding *ABM Personnel* or *ABM Representatives* in line with its policies and related disciplinary procedures. ABM has established safe and fair procedures for promptly investigating, recording and dealing with *Serious Misconduct*. Those who wish to lodge a *Complaint* about an alleged breach of this Policy by *ABM Personnel*, any *ABM Representative* or *ABM Partner* personnel (in cases where the *SEAH* has occurred within one of ABM's projects), are able to lodge their *Complaint* via ABM's *Safeguarding Focal Person*, and following either ABM's *Complaints Handling Policy* and related *Complaints and Critical Incidents Handling Procedures* or *Whistleblower Policy*.
- 36 Whilst any *ABM Personnel* is being investigated for allegedly perpetrating an act of *SEAH*, that person will be suspended from their work for the duration of the investigation. As with all investigations of *ABM Personnel* the alleged perpetrator will be treated with fairness, but the safety and needs of the *Victim/Survivor* are always paramount.
- 37 Substantiated *Complaints* in regard to *SEAH* will result in disciplinary action against the *Subject of the Complaint* (SOC) which may include termination of employment, and may, in accordance with relevant legislation, lead to criminal prosecution.

H. *Programs, Partners and Contractors*

- 38 All contracts with *Partners* and others contracted to work with ABM, will include a clause on ABM's expectations ABM has of *Partners* and contractors relating to *PSEAH*, including the requirement to report all incidents of *SEAH* relating to ABM's programs to ABM (via its *Complaints and Critical Incidents Handling Procedure* -- <https://www.abmission.org/pages/complaints-handling-procedure.html>) and the requirement to take a *Victim/Survivor-Centred Approach*.
- 39 Partner systems and Project-level risk assessments will be carried out for each project, analysing the risks of *SEAH* in the relevant contexts, and working with *Partners* to manage these risks. Where projects are funded by funds from DFAT, risk assessments must follow guidelines in DFAT's *PSEAH* policy, and risk management measures must meet at least the 'Minimum Standards' for the level of risk assessed, as per Appendix A of DFAT's *PSEAH* policy. Partner systems and Project-level risk assessments will be incorporated into the ABM(AID) Risk Matrix. Risk management for *PSEAH* will be monitored by relevant *Partner* and ABM staff, and regularly reported to ABM governance bodies (DevCom, Board).
- 40 ABM will continue to promote awareness among its *Partners* of lack of *Gender Equity*, and power imbalances, as a cause of *SEAH*.

- 41 ABM will work with its *Partners* to develop strong *Safeguarding* policies which promote a culture of zero tolerance of *SEAH* within *Partner* organisations, and zero tolerance of the cultures which enable *SEAH*. This work will include discussions and training³ in defining, reporting, investigating, documenting and managing *SEAH* incidents, including commitment to rights of women, rights of LGBTI+ people and *Bystander* responsibilities. Where projects are funded by DFAT, discussions and training will include the need to comply with the requirements of DFAT's *PSEAH* policy.
- 42 ABM will work to support the efforts of its *Partners* to build local capacity to increase accountability in the aid sector. This will include strengthening community-based feedback and *Complaints* and response mechanisms to ensure the communities with whom ABM and its *Partners* work are aware of their rights, the expected behaviour of all *ABM Personnel*, *ABM Representatives* and that of its *Partners*, so that communities are empowered to report violations of *PSEAH*. This includes the development of context-appropriate posters and other materials in local languages.
- 43 All requirements relating to *PSEAH* will be included in ABM's *Partner* funding agreements, and reflected in ABM's project cycle management systems.
- 44 ABM's due diligence and *Partner* Capacity Assessments will include assessment of *Partner* capacity to implement key *Safeguarding* and risk policies.
- 45 ABM's project monitoring will include provision for monitoring *PSEAH*, and for follow-up discussions with *Partners*.
- 46 ABM will encourage, assist, and where relevant⁴ require, its *Partners* to implement:
- Recruitment and referral practices that prevent the hiring of perpetrators of *SEAH*;
 - Systems to efficiently deal with perpetrators (effective formal *Complaints*, feedback and response mechanisms); to increase protection of, and accountability to populations with whom they work;
 - Regular training for all staff in prevention of and response to incidents of *SEAH*; and,
 - **Anonymous**, Safe, confidential and accessible reporting processes which have a *Survivor/Victim-Centred Approach*, where all allegations of *SEAH* are pursued rigorously, where concerns are heard and acted upon and where *Survivors* are fully supported and are protected from retaliation.
 - Anonymity for *Victims/Survivors* should they request it, or should their safety require it.

Review

ABM's Prevention of Sexual Exploitation, Abuse and Harassment Policy shall be reviewed by 2022 and every **two** years thereafter.

³ Via, for example, PowerPoint presentations or other tools which can be given to Partners or used in workshops by ABM with Partners (including online workshops run by ABM in consultation with the partner).

⁴ All partners implementing DFAT-funded projects will be required to have policies, processes and practices which align with DFAT's requirements.

DEFINITIONS

ABM Personnel

These comprise employed staff, *Volunteers*, contractors, ABM Board Members and Governance Committee Members.

ABM Representatives

All people who represent ABM in any way. This includes contractors, project visitors, ABM supporters whilst on visits to ABM projects, those who speak officially or do any work on behalf of ABM.

Bullying

Unreasonable behaviour that is repeated and that creates a risk to health and safety including physical and/or psychological harm. (see *B2001 ABM's Workplace Guidelines*, 2017).

Bystander

A *Bystander* is person who witnesses an incident first-hand, or who hears about it afterwards. (Definition based on Australian Human Rights Commission, *Bystander Fact Sheet for Employees* n.d; <https://www.humanrights.gov.au/our-work/sex-discrimination/projects/sexual-harassment-know-where-line>. Accessed 2 March, 2019)

Child Abuse

All forms of physical or mental (especially emotional) violence, injury or *Abuse*, maltreatment or exploitation, including *Sexual Abuse*, is *Child Abuse*. *Child Abuse* occurs when adults or other children hurt children either physically, sexually, emotionally, psychologically or in some other way. *Child Abuse* also occurs when a child's parent or sibling is subjected to any of the behaviours listed below in the presence or hearing of that Child. (For greater detail please see *B2013 ABM's Child Protection Procedures*, 2018).

Code of Conduct

A set of guidelines that binds members of a defined group to agreed standards of behaviour.

Community Development

Activities which address poverty and its causes and/or which address global social justice issues, carried out in the contexts of local communities.

Complainant

The person making the *Complaint*, including the alleged survivor of the *SEAH* or another person who becomes aware of the wrongdoing. (IASC Guidelines to Implement Minimum Operating Standards for the *PSEAH* 2013).

Complaint

An expression of dissatisfaction, grievance or concern. (partly based on International Standards Organisation standard on *Complaints* handling; used by ACFID, and partly on other sources)

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. (From DFAT's *PSEAH* policy, 2019).

Gender Equality

"The equal enjoyment by women, girls, boys, and men [and by people who are Sex and Gender Diverse]

of rights, opportunities, resources and rewards.” (From World Bank, *Gender and Development: A Trainer’s Manual*, found at <http://info.worldbank.org/etools/docs/library/192862/Module1/Module1c.html>. Accessed 27/10/14)

Gender Equity (or Fairness)

The means to achieving *Gender Equality*. (From World Bank, *Gender and Development: A Trainer’s Manual*, found at <http://info.worldbank.org/etools/docs/library/192862/Module1/Module1c.html>. Accessed 27/10/14)

Governance Committee Members

Members of the Development Committee, Finance Committee, Investment Committee, and Partnership Committee and any other Committee ABM may establish from time to time.

Humanitarian Response

The sum of decisions and actions taken during and after disaster, including immediate relief, rehabilitation, and reconstruction.

Misconduct

Unacceptable or improper behaviour. A breach of ABM’s *Code of Conduct*. (See also *Serious Misconduct*). In this policy the term ‘*Misconduct*’ includes ‘*Serious Misconduct*’.

Partners

Entities with whom ABM has formal agreements, and who implement projects funded by ABM.

PSEAH

Acronym for *Prevention of Sexual Exploitation, Abuse and Harassment*.

Report

An account of events given to someone, or a piece of information which describes something. A *Report* differs from a *Complaint* in that there is an obligation on *ABM Personnel* and *ABM Representatives* to report on any perceived, alleged or actual instances of *SEAH*, but a *Victim/Survivor* of *SEAH* may not wish to and is not obliged to make a *Complaint*.

Safeguarding

Safeguarding refers to the actions, policies and procedures that create and maintain a culture of safe and protective environments for all, including *ABM Personnel*, *ABM Representatives*, *Partners* and program participants/beneficiaries, particularly those that are most vulnerable to exploitation, abuse or exclusion. Safeguarding includes prevention, mitigation, response and feedback and *Complaints* handling mechanisms. (based on UK NGO network, Bond, definition of Safeguarding <https://www.bond.org.uk/resources-support/safeguarding>).

Safeguarding Focal Person/s

A person or persons designated to receive *Complaints* of cases of sexual exploitation, abuse and harassment, and of breaches of ABM’s Child Protection Policy. (IASC Guidelines to Implement Minimum Operating Standards for the *PSEAH* 2013). At ABM this person is also responsible for ensuring regular training in ABM’s Child Protection and *PSEAH* policies is provided to *ABM Personnel*, *ABM Representatives* and *Partners*.

SEAH

Acronym for *Sexual Exploitation, Abuse and Harassment*

Serious Misconduct

Conduct that is wilful or deliberate and that is inconsistent with the continuation of a person's employment contract. It is also conduct that causes serious and imminent risk to the health and safety of a person or to the reputation, viability or profitability of the employer's business. (Fair Work Commission, <https://www.fwc.gov.au/unfair-dismissals-benchbook/what-makes-dismissal-unfair/valid-reason/conduct>. Accessed 3 April, 2019)

Sexual Abuse

An actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. (IASC Guidelines to Implement Minimum Operating Standards for the *PSEAH* 2013)

Sexual Exploitation

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. (IASC Guidelines to Implement Minimum Operating Standards for the *PSEAH* 2013)

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 beneficiaries, community members, citizens, as well as against *ABM Personnel* and *ABM Representatives*.

Some examples of behaviour that may be sexual harassment include:

- 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;
- inappropriate advances on social networking sites;
- accessing sexually explicit internet sites;
- requests for sex or repeated unwanted requests to go out on dates; and
- behaviour that may also be considered to be an offence under criminal law such as physical assault, indecent exposure, sexual assault, stalking or obscene communications.

(From DFAT's *PSEAH* policy, 2019).

Sexual Misconduct

A generic term for *SEAH*.

Subject of the Complaint (SOC)

The person alleged to have perpetrated the *Misconduct* in the *Complaint*. (IASC Guidelines to Implement Minimum Operating Standards for the *PSEAH* 2013) ⁵

⁵ A useful website to assist *Subjects of a Complaint* explaining one's rights can be found at <https://www.legalaid.nsw.gov.au/publications/factsheets-and-resources/i-am-being-investigated-at-work-what-are-my-rights> (August 2017, accessed 15 March, 2019).

Transactional sex

The exchange of money, employment, goods or services for sex, including sexual favours other forms of humiliating, degrading or exploitative behaviour. This includes any exchange of assistance that is due to beneficiaries of assistance. (Task Team on the SEA Glossary for the Special Coordinator on improving the United Nations response to sexual exploitation and abuse, *United Nations Glossary on Sexual Exploitation and Abuse*, 5 October, 2016. Accessed at: https://reliefweb.int/sites/reliefweb.int/files/resources/un_glossary_on_sea.pdf 2 March, 2019)

Unlawful Discrimination

Unlawful Discrimination occurs where a person treats someone less favourably on the basis of any of the grounds prohibited by relevant state and federal legislation including; race; colour; ethnic origin; marital status; pregnancy; disability; family or carer's responsibilities; age; sex; sexual preference or orientation or transgender identity. (*B2001 ABM's Workplace Guidelines*, 2017).

Victim/Survivor

A person who is, or has been, sexually exploited or abused. (From DFAT's *PSEAH* policy, 2019). *Survivor* implies strength, resilience and the capacity to survive. (*IASC Guidelines to Implement Minimum Operating Standards for the PSEAH* 2013)

Victim/Survivor-Centred Approach

An approach to *Complaints*-handling that prioritises the needs and wishes of *Victims* or *Survivors* at all stages in the *Complaints*-handling process (initial reporting, investigation, final outcome reporting to governance bodies and reparations and ongoing support for *Victims* or *Survivors*.) Such an approach seeks to avoid re-traumatisation of *Victims/Survivors* and to empower them as engaged participants in the process.

Volunteer

Refers to unpaid community or church members who participate in ABM activities for an extended or repeated period of time. Some volunteers are classed as *Casual Helpers*. *Casual helper* refers to unpaid community members who assist in ABM activities in a capacity that:

- Is for a short period of time (a day or less), and
- Is in an environment that is supervised by ABM staff or, if at a hosting organisation, by the staff of the hosting organisation, and
- If the activity involves contact with children, the *helper* is within sight or hearing of other adults at all times.

Whistleblower

Someone within an organization who makes a *Complaint* about actual or suspected *Misconduct* within that organization.

Whistleblowing Policy

An organizational policy which requires staff members to report concerns or suspicions of *Misconduct* by colleagues. The reports may concern people at other organizations and people at other levels in the organization's hierarchy. (*IASC Guidelines to Implement Minimum Operating Standards for the PSEAH*, 2013). Whistleblower protections are enshrined in legislation. See Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019.

Witness

A person who gives testimony or evidence in the investigation, including the person who has experienced the sexual exploitation and/or abuse the complainant, a person of concern, a staff member of a *Partner* agency, the subject of the *Complaint* or another staff member, etc. (IASC Guidelines to Implement Minimum Operating Standards for the *PSEAH* 2013).

TABLE 1: ABM’s POLICY ALIGNMENT WITH ACFID CODE AND DFAT POLICY ON PSEAH

Section of ABM PSEAH Policy	ACFID Code of Conduct Quality Principle (QP), Compliance Indicators (CI), Verifiers (V) and Good Practice Indicators (GPI)	DFAT PSEAH Principle	ABM Policy or Procedure
1, 2, 3, 4, 5, 6, 7, 8 & 10	<p>1. LEADERSHIP AND GOVERNANCE</p> <p><i>QP 1.5 We advance the safeguarding of those who are vulnerable to sexual exploitation and abuse.</i></p> <p>CI 1.5.1 Members demonstrate their organisational commitment to the prevention of sexual exploitation and abuse through a survivor centred approach.</p> <p><i>Verifiers:</i> All members must have a policy document that:</p> <ul style="list-style-type: none"> • Describes the standards of behaviour for organisation’s <u>staff, representatives</u> and partners • Specifically prohibits sexual exploitation and abuse • Outlines how the policy is implemented through the organisation • Specifies the agency’s reporting responsibilities where an incident is identified, including processes for reporting to local enforcement authorities as needed. <p>CI 2.3.1 ‘Members demonstrate an organisational commitment to gender equality and equity’</p> <p><i>Verifier:</i> Policy statement or guidance document that commits the member to promoting gender equality and equity and to non-discrimination in regards to gender identity. <u>This policy should address how these are prioritised and advanced within organisational programming as well as within the organisation’s internal operations.</u></p> <p><i>Good Practice Indicator:</i> ‘Members work with staff, partners and communities to challenge attitudes which permit or excuse sexual misconduct both internally and within organisational program activities.</p>	<p>Principle 1: Zero tolerance of inaction</p> <p>Principle 2: Strong leadership accelerates culture change</p> <p>Principle 3: Victim/survivor needs are prioritised</p> <p>Principle 4: Preventing Sexual Exploitation, Abuse and Harassment is a shared responsibility</p> <p>Principle 5: Gender inequality and other power imbalances are addressed</p> <p>Principle 6: Stronger reporting will enhance accountability and transparency</p>	<p>A1009 Prevention of Sexual Abuse, Exploitation & Harassment Policy</p> <p>A1008 ABM Code of Conduct</p> <p>A1010 Complaints Handling Policy (and related Procedures)</p> <p>A1032 Gender Policy</p>

<p>1,3, 5, 11, 15 & 19</p>	<p>2. CODE OF CONDUCT</p> <p>C1 9.4.1 ‘Members specify the expectations of professional conduct of all staff and volunteers.’</p> <p><i>Verifier:</i> A documented code of conduct that specifies the values and expectations of professional conduct of all staff and volunteers. This must include reference to child safeguarding behaviours, prevention of sexual exploitation and abuse, transactional sex, anti-bullying and sexual harassment, and an obligation on staff and volunteers to report wrongdoing.</p>	<p>Principle 2: Strong leadership accelerates culture change</p>	<p>A1008 ABM Code of Conduct</p>
<p>11, 12, 13, 14, 15, 16, 17, 18 & 19</p>	<p>3. RECRUITMENT, INDUCTION, TRAINING, TRAVEL BRIEFINGS & PERFORMANCE MANAGEMENT</p> <p>CI 2.3.1 ‘Members demonstrate an organisational commitment to gender equality and equity.’</p> <p>CI 9.4.2 ‘Members staff and volunteers work in accordance with agreed standards of practice.’</p> <p><i>Verifier:</i> Documented evidence of induction, pre-deployment and refresher training provided to all staff and volunteers on the Member’s Code of Conduct and key policies including child protection, prevention of sexual exploitation, abuse and harassment, complaints and whistle blowing.</p>	<p>Principle 5: Gender inequality and other power imbalances are addressed</p> <p>Principle 6: Stronger reporting will enhance accountability and transparency</p>	<p>A1032 Gender Policy</p> <p>B2001 ABM Workplace Guidelines Section 2.7</p>
<p>27, 29</p>	<p>4. RISK MANAGEMENT & RISK REPORTING</p> <p>C I 4.2.2 ‘Members assess and manage risk in their development and humanitarian initiatives’.</p> <p><i>Verifier:</i> ‘A risk framework, risk management plan or approaches which assess and address risks for initiatives, <u>including from a protection/safeguarding perspective</u>)</p>		<p>A1006 Risk Management Policy and related risk reporting to the ABM Board</p> <p>AID Risk Framework and Country Risk Matrices</p>

<p>8, 9, 10</p>	<p>5. COMMUNICATIONS</p> <p>CI 7.3.4 ‘Members make information about their organisation and its work available to all stakeholders’.</p> <p><i>Verifier:</i> Members will provide the following information on their website:</p> <ul style="list-style-type: none"> • A statement of commitment to adherence to the (ACFID) Code • The scope and mechanism/process for lodging a complaint against the organisation, and a point of contact • Identification of the ability to lodge a complaint alleging a breach of the Code with the ACFID Code of Conduct Committee, and a point of contact • Staff Code of Conduct • Key policies relevant to the public including, but not limited to, privacy, complaints, transparency, non-development activity, child protection, <u>prevention of sexual exploitation and abuse</u>, and conflict of interest. 		<p>Communications Manual</p>
<p>20, 21, 22, 23, 24, 25, 26, 30</p>	<p>6. COMPLAINTS, REPORTING AND SURVIVOR SUPPORT</p> <p>CI 1.5.1 ‘Members demonstrate their organisation’s commitment to the prevention of sexual exploitation and abuse through a survivor-centred approach’.</p> <p><i>Verifier,</i> ‘All members must have a policy document that specifies the agency’s reporting responsibilities where an incident is identified, <u>including processes for reporting to local law enforcement authorities as needed</u>’.</p> <p>CI 7.3.3, ‘Members enable stakeholders to make complaints to the organization in <u>a safe and confidential manner</u>’</p> <p><i>Verifier:</i> ‘A documented complaints-handling policy that outlines <u>a triage system for escalating serious incidents</u> including Child Protection and Sexual Exploitation, Abuse and Harassment’</p>	<p>Principle 1: Zero tolerance of inaction</p> <p>Principle 3: Victim/survivor needs are prioritised</p> <p>Principle 6: Stronger reporting will enhance accountability and transparency</p>	<p>A1010 Complaints Handling Policy and related Complaints and Critical Incidents Handling Procedures</p>

	<p><i>Verifier:</i> ‘A documented complaints-handling policy that <u>outlines a referral process for complaints that do not fall within the scope of this policy</u>’</p> <p><i>Verifier:</i> ‘A documented complaints-handling policy that <u>includes a documented investigation procedure, which stipulates that all misconduct complaints must be recorded, subject to the wishes and welfare of the complainant</u>’]</p> <p>CI 7.3.4 ‘Members make information about their organisation and its work available to all stakeholders. <i>Verifier:</i> <u>Primary stakeholder communication: Information is provided to primary stakeholders on the expected behaviour of the organisation’s staff and volunteers, and access to its local complaints mechanism</u>’</p>		
<p>2, 12, 13, 14, 25, 27, 28, 30</p>	<p>7. PREVENTION OF UNACCEPTABLE RISKS, SANCTIONS AND GRIEVANCE</p> <p><i>1.1.5 Good Practice Indicator</i> Members limit the use of non-disclosure agreements in grievance processes.</p>	<p>Principle 6: Stronger reporting will enhance accountability and transparency</p>	<p>A1010 Feedback and Complaints Handling Policy and related Complaints and Critical Incidents Handling Procedures</p> <p>B2001 ABM Workplace Guidelines</p>
<p>29, 30, 31, 32, 33, 34, 35, 36</p>	<p>8. DOWNSTREAMING THIS POLICY FRAMEWORK TO PARTNERS AND CONTRACTORS</p> <p>CI 1.5.1 Members demonstrate their organisational commitment to the prevention of sexual exploitation and abuse through a survivor centred approach. <i>Members are required to extend this compliance indicator and verifiers to partners through MOU or similar.</i> <i>Verifiers:</i> All members must have a policy document that:</p> <ul style="list-style-type: none"> • Describes the standards of behaviour for organisation’s staff, representatives and partners • Specifically prohibits sexual exploitation and abuse 	<p>Principle 1: Zero tolerance of inaction</p> <p>Principle 3: Victim/survivor needs are prioritised</p> <p>Principle 4: Preventing Sexual Exploitation, Abuse and Harassment is a shared responsibility</p>	<p>Partner Toolkit for Development Activities</p> <p>Partner Toolkit for Humanitarian Response</p>

	<ul style="list-style-type: none"> • Outlines how the policy is implemented through the organisation • Specifies the agency's reporting responsibilities where an incident is identified, including processes for reporting to local enforcement authorities as needed. <p>CI 5.1.2 'Members undertake due diligence and capacity assessments of organisations with whom they work in formal partnerships'.</p> <p><i>Verifier:</i> <u>A documented assessment process which includes Capacity Assessment for implementation of key safeguarding and risk policies (eg child protection and prevention of sexual exploitation, abuse and harassment).</u></p> <p>CI 5.2.1 'Members negotiate shared goals and respective contributions with partners and those they collaborate with'.</p> <p><i>Verifier:</i> For formal partnerships, partnership agreement template or examples of partnership agreements that consistently describe:</p> <ul style="list-style-type: none"> • <u>Specific statements about child protection, prevention of sexual exploitation, abuse and harassment, and incident reporting.</u> <p>CI 7.3.4 'Members make information about their organisation and its work available to all stakeholders. Verifier: <u>Primary stakeholder communication: Information is provided to primary stakeholders on the expected behaviour of the organisation's staff and volunteers, and access to its local complaints mechanism</u>'</p>	<p>Principle 5: Gender inequality and other power imbalances are addressed</p> <p>Principle 6: Stronger reporting will enhance accountability and transparency</p>	
	<p>9. REVIEW</p>	<p>DFAT requires that this policy be reviewed at least every two years.</p>	<p>All ABM's new policies are reviewed after one year, and then at least every three years after that.</p>

TABLE 2: ABM POLICIES AND PROCEDURES RELATED TO THIS POLICY

Specific Aspect	Detailed Policy and/or Procedure
Code of Conduct	A1008 ABM Code Conduct
Child Protection To protect children from exploitation and abuse of all kinds in the delivery of ABM's programs and activities.	A1011 Child Protection Policy
Human Rights Recognition that all community members and ABM and Partner staff have the right to protection from sexual exploitation and abuse	D1017 Human Rights-based Approach to Development
Gender Recognition that gender inequity and power imbalances form a root cause of Sexual Misconduct	A1032 Gender Policy Align <i>PSEAH</i> with Gender Equity policy framework. (R10)
Vulnerable people Recognition that some groups of people are more vulnerable to sexual harassment, exploitation and abuse than others.	D2027 Guiding Principle on Working with Indigenous People (DFAT) D1028 Disability & Development Policy (DFAT, ACFID) D1034 Protection Policy Framework for Protection & Inclusion
Inappropriate workplace behaviour Includes discrimination through harassment, victimisation, vilification or bullying.	B2001 ABM's Workplace Guidelines 2017
Complaints ABM is committed to documented feedback and complaints-handling policies and procedures that take into account the needs, expectations and rights of complainants and provide the mechanisms for complaints to be addressed confidentially in an	A1010 Complaints Policy B2002 Whistleblower Policy B2004 Complaints and Critical Incidents Handling Procedures

<p>efficient, fair and timely manner. These procedures need to accommodate complaints from communities with whom ABM works, as well as the general public and ABM personnel.</p>	
<p>Travel ABM places the security and safety of all its representatives, and those with whom we work, as a top priority.</p>	<p>B2025 Travel Procedures</p>
<p>Publication on ABM's website</p>	<p>A1008 Code of Conduct; A1004 Privacy Policy; A1010 Complaints Handling Policy and related Procedures; Transparency Policy; A1041 Development and Non-Development Activities Policy; A1008 Child Protection; A1009 Prevention of Sexual Exploitation, Abuse and Harassment; A1005 Conflict of Interest Policy.</p>

TABLE 3: DFAT’s MINIMUM STANDARDS FOR RISK MANAGEMENT IN PSEAH

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 this Policy.	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	✓	✓	✓

DFAT PSEAH Minimum Standards						
Minimum standard	Obligation		Applies to			
	Organisations	Individuals	Low Risk	Med Risk	High Risk	Very High Risk
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 followed.	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	✓
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	✓

TABLE 4: ABM IMPLEMENTATION SCHEDULE

Item	Due Date	Person/s Responsible	Progress Sept 2020
Appoint a PSEAH Focal Point and develop a written description of role and responsibilities.	1 July, 2019	Executive Director	Safeguarding Focal Person appointed (includes PSEAH and Child Protection)
Publish ABM's PSEAH policy on ABM's website	1 July, 2019	Communications Manager	Completed. See https://www.abmission.org/pages/abms-values-policies-and-commitments.html
Ensure PSEAH is a standing agenda item on Board agenda.	September, 2019	Executive Director/ Executive Assistant	Completed.
Update ABM Code of Personal Conduct to include PSEAH and maybe amalgamate with Child Protection Code of Conduct (see Uniting World CoC).	August, 2019	International Programs Manager/Policy Working Group	Completed. It was decided to retain the separate Child Protection Code of Conduct, and create an ABM Code of Conduct.
Update ABM Gender and Development Policy to make it applicable to whole of ABM organisation as well as Development work; include requirement for power analyses which includes gender equity and gender equality to be done as part of context analysis component of project design.	August, 2019	International Programs Manager/Policy Working Group	Completed. The Board adopted the updated Gender Policy in December, 2020.
Update ABM risk matrices (for Board and DevCom) to include PSEAH risk management & reporting.	August, 2019	Chief Finance Officer/ International Programs Manager	Completed.
Update ABM's Complaints/Reporting mechanisms to include critical incident pathway and all the commitments	July, 2019	Policy Working Group	Completed. ABM Complaints and Critical Incidents Handling Procedures

to victim/survivor-centred approach, rights of alleged perpetrators, victim reparations etc.			accepted by the Senior Management Team June, 2020.
Draft a Counselling and Grievance Procedure as referred to in Workplace Guidelines.	August, 2019	Chief Finance Officer/Executive Director/Policy Working Group	A staff Grievance Procedure was drafted and accepted by Senior Management Team in September, 2019.
Update ABM Workplace Guidelines to include PSEAH.	September, 2019	Chief Financial Officer/Executive Director/Policy Working Group	In progress.
Update all ABM's Project Cycle Management documents to reflect all PSEAH provisions, including new provisions of Gender Policy.	August, 2019	Program Effectiveness Officer	Completed.
Update ABM's Partner Capacity Assessments to include capacity of partner to implement PSEAH and other safeguarding policies.	November, 2019	Program Effectiveness Officer	In progress.
Update partner Conditions of Funding Agreements to include requirements relating to PSEAH.	1 July, 2019	Program Effectiveness Officer	Completed. PSEAH requirements were included in 2019-20 Agreement template. The 2020-21 Agreement template will provide further updates on PSEAH requirements.
Update all ABM recruiting documents (incl. job ads, position descriptions, interview questions, referee questions, police checks) to include PSEAH commitments.	September, 2019	Executive Director/Executive Assistant/Chief Financial Officer	In progress.
Update ABM's Performance Review templates to include opportunities for discussion of Code of Personal	September, 2019	Executive Director/Executive Assistant/Chief Financial Officer	In progress.

Conduct, PSEAH, Whistle-blower requirements, and other key ABM policies.			
Update ABM's Travel Procedure to ensure travel briefings and debriefings include PSEAH, power imbalance, healthy sexual relationships etc.	September, 2019	International Programs Manager	Updated, and awaiting approval by Senior Management Team.
Update ABM's Humanitarian Response Policy and procedures to ensure inclusion of PSEAH and relate to Protection Policy (for vulnerable people).	August, 2019	International Programs Manager/Program Effectiveness Officer	Completed.
Engage with ABM's program partners to discuss need for PSEAH risk analysis of each project funded by DFAT, and minimum standards that apply to each level of risk, and the need to be compliant. (This has a 12 month roll-out period in the DFAT policy, commencing 1 July 2019).	30 June, 2020	International Programs Manager and team	In progress. A Partner Safeguarding Risk Assessment form has been devised, and partners have begun using it.
Work with partners to assist them to develop their own PSEAH approaches, and to become PSEAH-compliant where ACFID Code and funding conditions require this.	Ongoing	International Programs Manager and team	In progress. Due date is December, 2020.
Ascertain and work to align PSEAH policy and processes of ABM with those of its partner networks.	Ongoing	International Programs Manager and team	Some progress has been made here. Ongoing.

FURTHER RESOURCES (MOST RECENT VERSIONS OF THE DOCUMENTS BELOW)

ACFID Code of Conduct and Good Practice Toolkit. For specific sections of the Code which are relevant to *PSEAH*, see column 1 of Table 1.

Anglican Church of Australia, *Faithfulness in Service: A National Code for Personal Behaviour and the Practice of Pastoral Ministry by Clergy and Church Workers*, 6th Edn, 2017.

Australian Human Rights Commission, *Bystander Fact Sheet on Sexual Harassment (Employees)*, August 2018.

Core Humanitarian Standard, 2017

Core Humanitarian Standard (CHS), *Quick Reference Handbook on PSEAH*

DFAT's Australian NGO Accreditation Guidance Manual
G7 Whistler Declaration on Protection, June, 2018

DFAT's *Prevention of Sexual Exploitation, Abuse and Harassment Policy*, 2019

Inter-Agency Standing Committee (IASC), *Guidelines to Implement Minimum Operating Standards for PSEAH*, 2013

Inter-Agency Standing Committee (IASC), *Best Practice Guide: Inter-Agency Community-Based Complaint Mechanisms – Protection Against Sexual Exploitation and Abuse*, Geneva, 2016.

Tidewater Joint Statement on Combatting Sexual Exploitation and Abuse in the Humanitarian and Development Sectors (signed by the Australian Government), 2018

Australian NGO Cooperation Program (ANCP) Guidelines

AID Organisational Procedures Manual

ABM(AID)'s Partner Toolkits for (a) *Development* and (b) Humanitarian Assistance

ABM's Communications Manual

United Nations Secretariat, *Secretary-General's Bulletin: Special measures for protection from sexual exploitation and sexual abuse*, ST/SGB/2003/13, 9 October, 2003.

Policy History	
Name of Policy	Date Adopted
A1009 Prevention of Sexual Exploitation, Abuse and Harassment Policy	September 2019
A1009 Prevention of Sexual Exploitation, Abuse and Harassment Policy	September 2020

Table of Responsibilities for Implementation of this Policy

Responsible Body/Person	Area of Responsibility	Timeframe
ABM Board/ Development Committee/AID team/Church to Church team/Reconciliation team	Section A Leadership & Values – Champion and model a culture of zero tolerance to SEAH internally and with partners and other bodies; ensure ABM’s approach is survivor-centred; promote gender equality.	Ongoing
ABM Board/Marketing & Fundraising Manager/Safeguarding Focal Person	Section E Reporting – Quarterly Board agenda item on PSEAH	Quarterly
Development Committee/AID team/Church to Church team/Reconciliation team	Section H Programs, Partners & Contracts— Engage with partners to ensure they comply with ABM policy and DFAT requirements	Partners to have PSEAH policy and related processes in place by 10 December, 2020. Training provided to partners June to December 2020. Ongoing checks and refresher training after 2020.
Marketing & Fundraising Manager/AID team	Section D Complaints – Widely disseminate clear information about ABM’s	2019 and ongoing

	Complaints Handling Processes; Deal effectively with complaints when received	
ABM Board/Senior Management Team	Section F Victim/Survivor Support and Reparations — Assess and ensure ongoing needs of victims where ABM is deemed to have a responsibility	Ongoing
Senior Management Team/Safeguarding Focal Person/ Compliance Officer	Section B Recruitment – Ensure ABM’s recruitment processes effectively screen out people with a history of SEAH; Section C Induction, Training, Travel Briefings, Performance Management – Work to prevent SEAH and deal effectively with incidents if they occur; Ensure Safeguarding Focal Person receives regular training in PSEAH Section G Discipline and Grievance – Effectively manage follow-up to complaints against staff;	2019 and ongoing
Safeguarding Focal Person	Section C Induction, Training, Travel Briefings, Performance Management – Ensure staff, volunteers and ABM Board and committees receive regular training	Ongoing annual bi-annual training
Board Policy Review Sub-Committee/Compliance Officer/Safeguarding Focal Person	Review policy at least every two years	End 2022