

Interplast Australia & New Zealand

# Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy

**Policy Status:**  
**Approved**

<b>Initial CEO Endorsement:</b>	04 October 2018
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<b>Policy Owner:</b>	Director International Programs

## Revisions to Policy

Significant Changes	Endorsed by CEO	Approved by Interplast Board
Initially approved	4 October 2018	9 October 2018
Policy name changed to include Harassment. Updated in accordance with DFAT PSEAH Policy. Reference to new minimum standards. Strengthen connection to Child Protection Policy for matters relating to children.	12 June 2019	18 June 2019
Updates to staff position titles and responsible roles related to this policy, as well as minor wording changes.	29 September 2021	12 October 2021
Updated to reflect new template and new definitions. Separated policy and procedure. Complete review.	28 September 2023	10 October 2023
Minor word amendments and definitions by Safe Working Group	16 May 2024	N/A

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## Section 1: Purpose

The purpose of the Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy is to outline Interplast Australia & New Zealand's (Interplast) approach to preventing, and where necessary, responding to sexual exploitation, abuse and harassment of adults.

This policy should be read and used in conjunction with Interplast's Child Protection Policy and [Safeguarding Procedures Guide](#) document, which provides full details of this "policy in practice" and outlines procedures related to:

- recruitment and screening
- training and development
- codes of conduct
- international program planning and implementation
- reporting and response processes
- child photo and case study guidelines.

The PSEAH Policy protects personnel by providing clear boundaries and guidelines, helping to avoid ambiguous situations and behaviours in the workplace or program activities which may be misinterpreted and potentially lead to false allegations against personnel and partners.

This policy will support Interplast to:

- Demonstrate Interplast's commitment to protect vulnerable adults from harm, abuse, sexual abuse, exploitation, or sexual exploitation
- Ensure all Interplast personnel and partner organisations prioritise the safety and welfare of vulnerable adults and uphold our joint responsibility to create safe culture
- Ensure procedures are in place to prevent and manage actions and/or behaviour of all Interplast personnel, that could result in harm, abuse or exploitation of any vulnerable adults including community members and Interplast personnel
- Build an open and aware environment where concerns for the safety and well-being of any vulnerable adults are managed in a fair and just manner  
Provide guidance on how to respond to concerns and allegations relating to the safety and welfare of vulnerable adults, including reporting sexual abuse, harassment and exploitation and policy non-compliance
- Ensure that Interplast adheres to Australian and international criminal laws protecting vulnerable adults including community members and Interplast personnel
- Demonstrate our commitment to the ACFID Code of Conduct and the Australian Government Department of Foreign Affairs and Trade's Prevention of Sexual Exploitation and Harassment (PSEAH) Policy 2019.

## Section 2: Scope

The PSEAH Policy applies at all times to Interplast personnel and observers accompanying any Interplast activity.

This policy is also applicable to relevant local partners in the countries in which Interplast works and is referenced in all documented partnership agreements. Local partner organisations are expected to act in accordance with the principles and reporting requirements outlined in this policy. Interplast works to ensure that those partners are aware of the policy and understand both their and Interplast's obligations relating to it.

This policy also applies to third-party individuals and/or organisations who have been granted authority to fundraise for Interplast.

## Section 3: Guiding Principles

The principles underpinning this policy are:

**Zero tolerance:** Interplast believes there are no circumstances under which sexual exploitation, abuse and/or harassment are acceptable. Interplast has zero tolerance for such behaviour and commits to acting quickly and in a fair and reasonable way on any suspicions, complaints or reports to us of such behaviour by our personnel, observers or those of partner organisations.

**Survivor needs are prioritised:** Interplast maintains a 'do no harm' approach, prioritising the rights, needs and wishes of the survivor, while ensuring procedural fairness for all parties.

**Positive organisational culture and high standards of ethical behaviour:** Interplast understands that strong leadership accelerates cultural change. Interplast's Board of Directors and CEO take responsibility for leading the development of increased awareness and organisational capacity for effectively preventing SEAH; facilitating open discussion of the issue; and enabling effective reporting and addressing of incidents that may occur.

**Consultation and conversation with partners:** SEAH exists across borders and cultures. However, how SEAH is addressed varies according to national, cultural and other contexts. Interplast commits to engaging respectfully with our culturally diverse partners in open consultation and conversation in order to learn and understand, share good practice and support culturally appropriate approaches to the prevention of SEAH in their organisations and communities.

**Preventing SEAH is a shared responsibility:** Interplast recognises that all organisations, including those in any partnership or other connection with Interplast, share the responsibility to develop their own and others' capacity to deal sensitively and effectively with SEAH wherever it occurs.

**Gender inequality and other power imbalances are addressed:** Interplast recognises that gender, disability, age and poverty have an especially powerful intersection with the likelihood of

SEAH. Women and children with disability in poor communities have the highest risk of experiencing SEAH. Interplast's actions promote gender equity, child protection, social inclusion, and accountability for a 'do no harm' approach.

### **Stronger monitoring and reporting will enhance accountability and**

**transparency:** Interplast understands the prevention of SEAH as a fundamental obligation of our work. We establish and strengthen monitoring and reporting mechanisms in order to better track SEAH, understand risks, and improve prevention strategies and responses. In this, Interplast recognises our accountability to the people and governments of the nations in which we are privileged to work, as well as our accountability to Department of Foreign Affairs and Trade (DFAT), to the Australian Council for International Development (ACFID), to all other stakeholders and communities that connect with Interplast.

## Section 4: Policy

### 4.1: Zero tolerance

Interplast believes all people have the right to live their lives free from sexual violence, exploitation, abuse and any abuse of power.

We recognise that, at times there are unequal power dynamics within and between organisations in relation to those we support across the Asia Pacific region, and there is an inherent risk of some people exploiting their position of power for personal gain.

To this end, Interplast has zero tolerance of sexual exploitation, sexual harassment and sexual abuse of any individual.

Interplast demonstrates this by ensuring:

1. Sexual exploitation or abuse by any Interplast personnel constitute acts of gross misconduct and are therefore grounds for immediate dismissal
2. Exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited
3. Interplast personnel are prohibited from sexual relationships as follows:

**Sexual activity with vulnerable adults:** Interplast strictly prohibits personnel from having sexual relationships with vulnerable adults. Mistaken belief of age is no defence.

**Sexual activity with beneficiaries:** Interplast strictly prohibits Interplast personnel from engaging in any form of sexual activity with Interplast's program beneficiaries.

**Sexual activity with partners:** Interplast is clear that any partnership, is based on mutual respect for values and beliefs. As such, Interplast strictly prohibits engaging in sexual activity with personnel from its local partners where there is a potential for an abuse of power.

**Purchasing sex or sex-related services:** Not engaging in any form of transactional sex with primary stakeholders of Interplast and acknowledge this to be any form of sexual activity in

exchange for goods or services, money, employment or preferential treatment. Although Interplast does not make a judgement against individuals who participate in the sale of sex, the organisation has banned this activity to prevent potential sexual exploitation and/or abuse.

***Sexual activity with other Interplast personnel that they line manage:*** Interplast prohibits personnel from having a sexual relationship with people who they line manage or supervise, or where there is a clear power imbalance.

Where Interplast personnel are engaged in relationships with other Interplast personnel<sup>1</sup> they must:

- Ensure their relationship is known to Interplast even if the relationship is at an early stage and may not continue
- Behave professionally and conduct their relationship in a way that does not impact on Interplast business
- Ensure they do not make work decisions based on the relationship
- Ensure that their relationships do not lead to fraudulent or corrupt behaviours.

## 4.2: Organisational culture

Interplast will make every effort to create an organisational culture in which personnel, partners, and people engaged in or beneficiaries of Interplast's activities can feel safe and confident to report any SEAH issues, and where relevant, contribute to investigating these. Specifically, Interplast will:

- Ensure that the standards of ethical behaviour expected of Interplast personnel are readily available to partners through our partnership agreements and other stakeholders on our website
- Progressively build the capacity of personnel to comfortably discuss SEAH internally and with our partners, including discussion of prevention of SEAH with partners' managers and staff
- Identify a SEAH focal point, responsible for monitoring our progress and compliance regarding the prevention of SEAH.

Interplast recognises that there are several factors in the way we deliver our overseas programs which are important to recognise in order to keep people safe:

- programs may involve contact with vulnerable people that is of a personal (clinical) nature. As such, it is Interplast's duty of care to ensure that it does no harm and takes steps to ensure that the safeguarding of this contact is taken very seriously
- programs may also involve indirect contact with vulnerable people, through local partner clinicians, and may include depiction of vulnerable people in a clinical setting (for example, use of case studies in medical training)

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<sup>1</sup> Interplast recognises that a number of its volunteer medical personnel are in or may be in a relationship with other volunteer medical personnel.

- local partners (medical professionals) with whom it works to deliver programs play a specific role in the community to keep vulnerable people safe and are trusted and accessible professionals
- vulnerable people may come into contact with our programs who are not patient beneficiaries but are family members of patients, or people within the broader community where Interplast volunteer teams are visiting and working.

To this end, Interplast will ensure an organisational culture of:

**Awareness:** Educate and train people leaders and employees to model respectful and non-discriminatory behaviour

**Prevention:** Screen and provide training and guidance to all persons within the scope of this policy

**Reporting:** Provide channels for disclosure and reporting of safeguarding concerns

**Responding:** Provide safe programs and environments by identifying and managing risks; prioritise gender equality and the rights of diverse women and girls within programming and at all levels of the organisation to shift the gender and power inequalities that are at the root of sexual exploitation, abuse and harassment.

These are in line with, and support Interplast's organisational values of integrity, respect and collaboration.

### 4.3: Safeguarding principles

Where a sexual exploitation, abuse or harassment incident is reported, Interplast commits to the following safeguarding principles:

**Survivor led** – Interplast is committed to listening to survivors and being led by the wishes of the survivor where possible and appropriate to do so.

**Non-directive** – As an organisation, Interplast aims to empower survivors and complainants by helping them explore their options in a safe manner, without imposing our personal views

**Non-judgemental** – Interplast never judges survivors or complainants for their actions or decisions

**Confidentiality** – Interplast is committed to confidentiality when carrying out our work within the Asia Pacific region. The organisation will not share information outside Interplast unless there is a belief that someone is in danger, or a child has been or may have been harmed

**Independent investigations** – The organisation will ensure investigations are independent and discreet, recognising the rights and duty of care to all involved – including the complainant or survivor, witnesses, and the individual accused.



#### 4.4: Recruitment and screening

Interplast recognises that those who seek to harm to others may specifically seek out work with aid organisations, as this gives them an avenue to work within vulnerable communities.

Interplast is committed to safe recruitment, selection and screening practices which aim to recruit the most suitable people to work and volunteer for Interplast. Interplast's recruitment and screening processes comply with DFAT's Minimum Standards for PSEAH.

Interplast's safe recruitment, selection and screening practices for all personnel and observers of Interplast will include:

- addressing PSEAH in interviews and verbal reference checking
- national criminal history checks completed by Interplast on commencement and at periodic intervals, for each country in which the individual has lived for 12 months or longer over the last 5 years, and for the individual's countries of citizenship
- working with children checks (WWCC) or similar, completed on commencement and at periodic intervals, relevant to their home State (unless exempt)
- reading Interplast's Child Protection and PSEAH Policies and signing the Child Protection Code of Conduct on commencement and annually thereafter (volunteers will sign before any engagement with Interplast program activities, or annually, if they attend more than one program activity per year)
- documented requests for personnel to disclose whether they have been charged with any sexual exploitation, abuse or harassment offences, and their response and signed declaration on commencement and at periodic intervals.

#### 4.5: Codes of Conduct

Interplast maintains several professional and ethical codes of conduct, complementary to our child protection code of conduct, specifying the standards of behaviour that can be expected of Interplast personnel. These are the:

- Employee Code of Conduct
- Volunteer Code of Conduct
- Program Participant Protocol and
- Board Director Code of Conduct.

These codes of conduct:

- Specifically outline expectations and behavioural standards, for example, in relation to non-engagement in transactional sex or fraternisation with primary stakeholders, advancing the safeguarding of those who are vulnerable, and reporting any known, suspected, actual or potential examples of unethical conduct
- Are expressed in plain English and are readily available to review

- Are read and signed annually by employees, consultants and Board Directors. Volunteers will sign before they have any engagement with Interplast program activities, or annually, if they attend more than one program activity per year.

Each Code of Conduct signatory is expected, upon becoming aware, to immediately report any concern, suspicion or allegation of SEAH or any breach of this Policy.

#### 4.6: Training and development

All Interplast personnel and observers, will receive information relating to Interplast's PSEAH Policy and practice during their recruitment and induction process. This includes the requirement to complete Interplast's online Child Protection Training module, as well as watching a PSEAH-specific training video (for employees) and undertaking the Volunteer Training Module (volunteers) which includes a specific section on their roles and responsibilities related to PSEAH. Employees and Board Directors will complete ACFID's Introduction to Safeguarding module. and provide evidence of the course completion for Interplast records. Further training may be tailored to individual requirements.

All employees will receive annual refresher training in PSEAH, and information gained from external training opportunities will be shared with others through team workshops. Volunteers and other program participants will undertake specific training relating to their roles and responsibilities relating to the delivery of Interplast programs and will be provided with a range of resources to support their work, to keep project participants safe during delivery of Interplast activities overseas.

#### 4.7: International programs and partnerships

Interplast works with a range of partners including government and non-government organisations. We recognise and value the knowledge, expertise and skills of our partners. We have a vested interest in developing strong, well-managed, open and transparent relationships with our partners over time, in recognition of the fact that these organisations will ultimately drive change in improving the services and opportunities for people in their communities within the countries in which we work.

Interplast works to the full extent of our influence with local partners, to strengthen their own safeguarding standards as appropriate to their context, and to mitigate the risk of sexual exploitation, abuse and harassment.

Specifically, we will:

- Ensure that PSEAH is identified as a joint commitment in our partnership documentation
- Discuss with our partners their capacity to assess, monitor and address SEAH issues, including considering what tools and resources our organisations can share to strengthen each other's capacity in this area

- Adopt a learning stance, seeking to listen and reflect about how we can improve our efforts to safeguard against sexual exploitation, abuse and harassment and support partners to do likewise.

In the planning and delivery of international programming, Interplast utilises a range of processes and tools to ensure the safety of vulnerable adults and they should be completed in conjunction with the Child Protection Policy. This includes:

- Undertaking Safeguarding Risk Assessment for all activities
- Ensuring that all program personnel have been recruited, screened and trained in accordance with Interplast policy
- Providing plain language and (where relevant) translated information available for local partners and program beneficiaries during the delivery of activities
- Ensuring that program participants (staff, volunteers and local partners) have up to date information available to them on local support and reporting contacts available in the country they are working in
- Specific prompts in pre-departure briefing, post-activity debriefing and reporting focused on safety, raising concerns around risks and reporting incidents
- A range of resources available which are sent with clinical and training teams, to provide clear, plain language (and translated where required) information to local partners and beneficiaries about our commitment to safeguarding and how they can raise concerns if required.

Interplast recognises that there is always a possibility of inflicting unintended harm, particularly in relation to vulnerable populations. Responsibility for ensuring all program risks are identified and responded to lies with Interplast's Program Coordinators, with compliance responsibility resting with the Head of Program Operations.

#### 4.8: Reporting and response processes

Interplast will take all concerns and reports of abuse, exploitation, intentional harm and/or non-compliance of this policy seriously and act on these reports immediately. There is zero tolerance of inaction by Interplast personnel, observers and Interplast program partners.

Our reporting processes aim to ensure all parties are treated fairly and that the principles of natural justice are upheld.

Any Interplast personnel, observers or local partners who develop a suspicion or awareness that an incident of sexual exploitation, abuse or harassment has occurred must report their concerns immediately to their line manager, safeguarding focal point or the Chief Executive Officer (CEO). Where a concern relates to suspected wrongdoing by the CEO, concerns must be raised directly with the President of Interplast's Board of Directors. Further details on how to do this, can be found in the Safeguarding Procedure Guide.

In most instances, reporting is mandatory. Discretion about whether to report an incident cannot be exercised. If in doubt about whether reporting is mandatory, please consult with the safeguarding focal point or CEO.

Due to the importance of upholding mandatory reporting requirements, all Interplast personnel need to be always alert to potential incidents. Interplast's Whistleblowing Policy and Safeguarding Procedures provide further information about the reporting and investigation of SEAH incidents including:

- how to raise a concern
- confidentiality for those reporting
- protection for those reporting
- protection for those identified as survivors
- fair treatment for those who are subject to a report
- the process of investigating a report and potential outcomes.

Any breach of strategic significance or any material risk associated with this policy will be promptly reported to the Board of Directors as soon as practicable, and any emerging risks will be recorded on the organisational risk register. This register is reviewed by the Board twice a year, with new and emerging risks being reviewed regularly by the Audit & Risk Committee of Interplast.

Failure to report any suspicion of abuse relating to someone else is a breach of Interplast's policy and could lead to disciplinary action being taken (see Section 6: Sanctions).

Interplast complies with the requirements of our donors with regards to reporting. Particular note is taken of the reporting requirements of DFAT as outlined in the DFAT Prevention of Sexual Exploitation, Abuse and Harassment Policy 2019. Where mandatory reporting is required, the person with the most knowledge of the incident should work with the safeguarding focal point and the CEO to write and submit the report.

Any reports of alleged sexual exploitation, abuse or harassment incidents must be made to DFAT **immediately** using the approved 'notification form' ([www.dfat.gov.au/pseah](http://www.dfat.gov.au/pseah)) and emailed to [seah.reports@dfat.gov.au](mailto:seah.reports@dfat.gov.au). This is regardless of how the activity was funded.

For any issues relating to individuals under 18 years of age, Interplast's Child Protection Policy, and subsequent guidelines become the primary policy document.

Any sexual exploitation, abuse or harassment allegations that may involve a criminal aspect should also be reported through correct law enforcement channels.

**Appendix A:** includes a flowchart summary of how to make a report, what should be reported and when, and what may happen following a report. Full details of the reporting and response process can be found in the Safeguarding Procedures.

Issues of SEAH may be reported to Interplast by members of the Australian public or other Australian or international stakeholders and will be handled in accordance with our complaints

handling policy. The opportunity to make a complaint is open to anyone. Interplast will ensure that organisational complaints mechanisms remain current and responsive. This includes maintaining on our website clear information about how to make a report and a dedicated email address for receiving reports as [admin@interplast.org.au](mailto:admin@interplast.org.au).

#### 4.9: Communication and marketing

Interplast recognises our responsibility to keep project participants safe when using their images or personal information for marketing and communication purposes. Accordingly, Interplast will, at all times, portray project participants in a respectful, dignified, appropriate and consensual way.

Interplast has a comprehensive Case Study and Photography Policy and associated guidelines which detail specific requirements relating to the depiction of project participants, processes relating to obtaining informed consent, and approval processes for use of images and stories. These requirements on the obtaining and use of vulnerable adults' images align with the ACFID Code of Conduct (clause 6.2).

Interplast will request the immediate removal of any images that are deemed inappropriate in accordance with the policy and related guidelines, when representing Interplast and its work. Refusal to follow this request will see Interplast revoke any authority previously granted to represent or support Interplast.

Further details can be found in the Case Study and Photography Procedures.

## Section 5: Monitoring and Review of this Policy

Interplast's PSEAH Policy will be reviewed every two years, and more often if a specific reason to review is presented.

Oversight of this policy sits with Interplast's Director – International Programs and managed operationally by Interplast's Safeguarding and SEAH Focal Point. The internal Safeguarding Working Group, which is represented by Interplast's international programs, fundraising/communications and HR/corporate services teams, will meet quarterly, to discuss the policy in practice and raise any areas of concern or suggest updates through the Executive Leadership team.

A 2-yearly review of this policy will incorporate organisational learning as a result of PSEAH risk assessments and management plans; incident reports; changes in our partner policies / procedures, and/or the scope of Interplast's project work.

The Safeguarding Working Group and Safeguarding Focal Point will manage the review. Personnel, board members and partner organisations will be consulted. Any recommendations with respect to improving the PSEAH policy may be discussed with the Focal point at any time. Personnel are encouraged to be proactive in identifying suggestions for improving child safeguarding practices.

## Section 6: Sanctions

Where there is an allegation of this policy having been breached by any Interplast personnel or observer, the Interplast Chief Executive Officer, will consider sanctions that may include suspension, transfer, removal from a program, demotion or dismissal.

During any formal investigation period, while any case is being assessed or where the safety of the victim/ survivor is at risk, an employee may be suspended (on full pay), or a volunteer or observer may be moved from an Interplast activity. It is important to note that this action is to be taken as a matter of precaution not a judgement of guilt.

Where an investigation by the relevant authorities finds an Interplast employee to have put project participants at the risk of sexual exploitation & harassment, sanctions considered will include suspension, transfer, demotion and/or dismissal and legal recourse may be taken if appropriate.

A volunteer or program observer found to have put project participants at the risk of sexual exploitation & harassment, will not be accepted for any further Interplast activities and legal recourse may be taken if appropriate. This includes overseas medical personnel who may be joining activities as a local member of a team.

If Interplast receives a complaint about a local partner, Interplast will notify the partner organisation and expect a timely and appropriate response. Interplast should make all efforts to assist the partner to ascertain its obligations under local law. Where appropriate, Interplast may work with the partner to address the issue through an appropriate independent investigation. If the outcome is that abuse has occurred, ongoing work with the partner cannot involve the individual(s) concerned. If there is reason to believe that an allegation of abuse has been dealt with inappropriately by a partner, then they risk withdrawal of funding or ending the relationship.

Interplast will also consider sanctions when any partner organisation or third-party individual with authority to fundraise for Interplast are alleged to have breached this policy or the Child Protection Code of Conduct. Sanctions may include voiding any ongoing partnership agreement or ceasing to accept donor funds. See Safeguarding Procedures for further details on relevant sanctions.

Disciplinary action will be taken against any personnel or partner organisation staff member found to:

- Have failed to report a safeguarding concern
- Have intentionally made a false and malicious allegation.

## Section 7: Related Documents and Legislation

As a signatory to the ACFID Code of Conduct, Interplast is committed to the human rights and safety of its employees and volunteers by protecting, valuing and supporting them and enabling them to conduct themselves professionally and according to our stated values.

Interplast enables them to report wrongdoing through fair, transparent and accessible procedures (Quality Principle 9 People and Culture; Commitment 9.2 and 9.4).

Furthermore, Interplast respects and responds to the needs of those who are affected by marginalisation and exclusion (Quality Principle 1, Rights Protection and Inclusion).

As a DFAT-accredited NGO, Interplast is also required to comply with DFAT standards relating to safeguarding of vulnerable people and protection of whistle-blowers, specifically, DFAT Accreditation Criteria A2.3, A2.4, and A3, together with DFAT's own Preventing Sexual Exploitation, Abuse and Harassment Policy. (see Appendix B)

Interplast is obliged to adhere to relevant safeguarding legislation which prohibit the abuse and exploitation of individuals, both in Australia and overseas. These include legislation in countries where Interplast's programs are implemented, and international laws and conventions in relation to all forms of abuse and exploitation.

Interplast regularly reviews the local context of its partner countries in relation to national legislation and policies and updates its resources, so that volunteer teams and local partners have easy access to this information.

Name of document/legislation	Location/hyperlink
ACFID Code of Conduct	<a href="https://acfid.asn.au/code-of-conduct/">https://acfid.asn.au/code-of-conduct/</a>
DFAT PSEAH Policy	<a href="https://www.dfat.gov.au/international-relations/themes/preventing-sexual-exploitation-abuse-and-harassment">https://www.dfat.gov.au/international-relations/themes/preventing-sexual-exploitation-abuse-and-harassment</a>
Child Protection Policy	Interplast Key Documents
Safeguarding Procedures	
Whistleblowing Policy	
Complaints Policy	
Grievance Resolution Policy	

Human Resource Manual	
Incident Management Framework	
Privacy Policy	
Case Study and Photography Policy	
Case Study and Photography Guidelines	

## Section 8: Definitions

Word / Phrase	Definition
Personnel	<p>Personnel includes all employees, consultants, volunteers, Board Directors, Committee members, Working Group members and Ambassadors that are engaged by Interplast to perform the work of Interplast.</p> <p>Volunteers include both professional (e.g. administrative roles) and medical volunteers (e.g. surgeons, anaesthetists, nurses or allied therapists), students, interns, or any other person who has entered into a volunteer arrangement or agreement with Interplast.</p>
Observer	<p>Observers are individuals accompanying an Interplast program, delivered by volunteers in a partner country (e.g. representing a donor organisation or students on an observational placement).</p> <p>Observers do not have a clinical role but may assist the clinical team by completing tasks related to program delivery.</p>
Partner	<p>Partner includes organisations that work with Interplast to implement a joint project with mutually agreed outcomes, and/or with whom Interplast has a signed partnership agreement and/or memorandum of understanding.</p> <p>Partner organisations may or may not be recipients of funds through Interplast.</p>
Beneficiary	<p>Beneficiary 1) a patient receiving treatment through an Interplast activity (this may include a consult only, surgery, allied health treatment or other clinical care, and could be provided by an Interplast volunteer, or a local partner clinician during an Interplast</p>

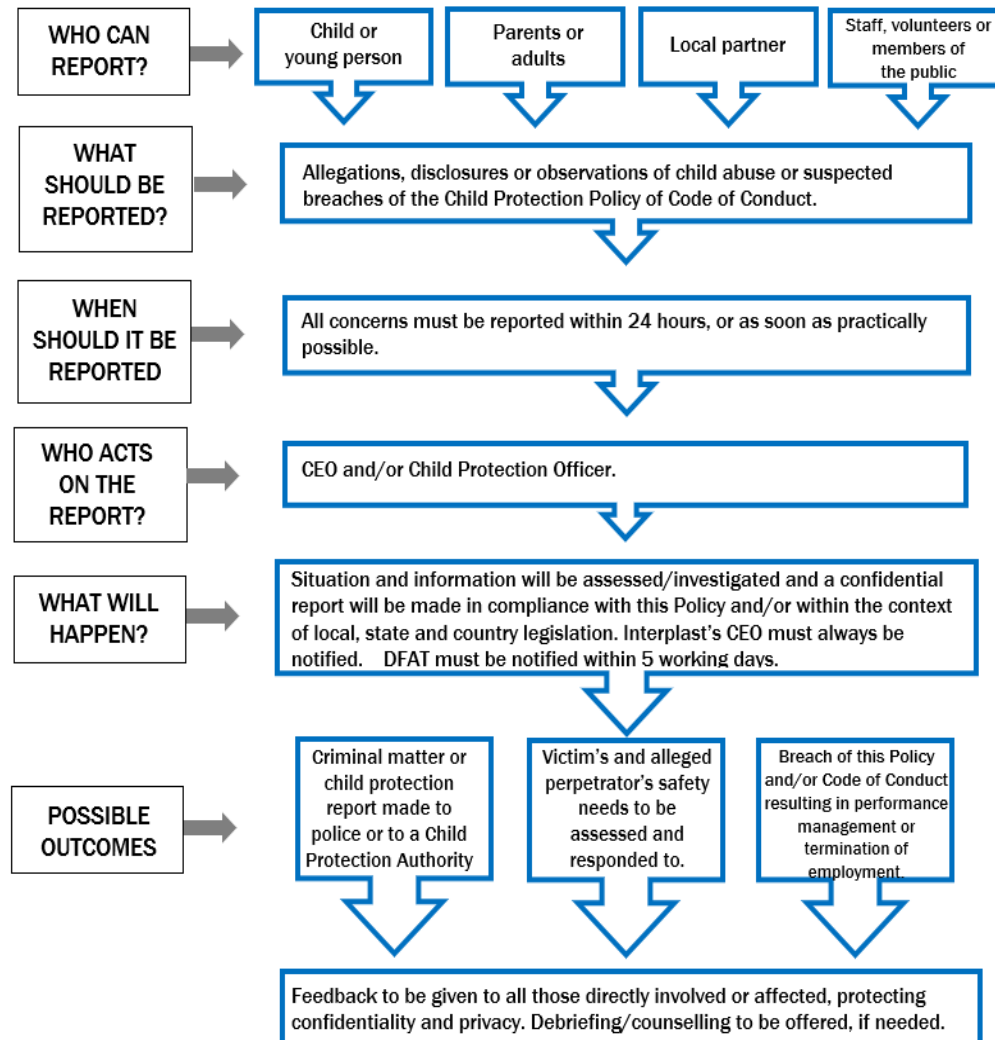


	activity), or 2) local partner personnel participating in training delivered by Interplast.
Stakeholder	Stakeholders include all personnel, observers, partners, beneficiaries <b>and</b> supporters, community members in the country where we work, funders, international development peers and organisations, or any other individuals or organisations that connect with Interplast.
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 (in the law of the host country or under Victorian law [16 years], 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.
Adults	Individuals over the age of 18
Survivor	A person who is the alleged subject of sexual harassment, abuse or exploitation.
Transactional sex	Transactional sex is a form of sexual exploitation. It refers to sexual relationships or acts where the giving and/or receiving of gifts, money, employment or other services is an important component.

Fraternisation	<p>Fraternisation refers to any relationship that occurs in the course of conducting business that involves, or appears to involve, preferential treatment, partiality or improper use of rank or position.</p> <p>Fraternisation could potentially take the form of inappropriate friendships, public displays of affection, or voluntary sexual relationships.</p>
Informed consent	<p>Ensures the child and the parent or guardian understand the implications, purpose and potential uses of photographs or videos</p>
Safeguarding	<p>Safeguarding is the action that is taken to promote the welfare of children (or other vulnerable people) and protect them from harm.</p> <p>Safeguarding is the protection of vulnerable people of abuse and maltreatment, preventing harm to health or development, ensuring that they can live and grow with the provision of safe and effective care.</p>

## Section 9: Appendices

### Appendix A - Reporting Framework



## Appendix B – DFAT Minimum Standards

The DFAT Policy takes a risk-based, proportional approach to PSEAH. DFAT staff and partners must assess the level of risk for SEAH occurring and apply minimum standards accordingly. Guidance on assessing the risk of SEAH is provided to assist DFAT partners determine the level of risk. The PSEAH Minimum Standards are then applied commensurate with the level of risk identified.

DFAT PSEAH Minimum Standards						
Minimum standard	Obligation		Applies to			
	Organisations	Individuals	Low Risk	Med Risk	High Risk	Very High Risk
<b>1. Have a PSEAH policy or other documented policies and procedures in place and clearly communicate expectations of this Policy.</b>	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	✓	✓	✓	✓
<b>2. Have reporting and investigation procedures in place.</b>	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.	✓	✓	✓	✓

DFAT PSEAH Minimum Standards						
Minimum standard	Obligation		Applies to			
	Organisations	Individuals	Low Risk	Med Risk	High Risk	Very High Risk
<b>3. Have risk management processes that include the risk of SEAH.</b>	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	✓	✓	✓
<b>4. Effective PSEAH training in place.</b>	<b>PSEAH training for personnel, including downstream partners and individuals that deliver DFAT business.</b>	<b>Complete PSEAH training and provide evidence of this.</b>	X	X	✓	✓
<b>5. Recruitment and screening processes and employment practices address and manage the risk of SEAH.</b>	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	✓	✓

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