Policy Document



Interplast Australia & New Zealand

Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) Policy

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Last Review Date: 08 October 2025

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Policy Owner: Safeguarding Focal Point

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
Major update in line with DFAT's updated Protection from sexual exploitation, abuse and harassment Policy (2025), Child Protection Policy (2025) and related guidance notes.	08 October 2025	11 November 2025

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Section 1: Purpose

Interplast Australia & New Zealand (Interplast) has a zero-tolerance approach to sexual exploitation, abuse and harassment (SEAH) and is committed ending all forms of gender-based violence. Interplast recognises that by the nature of our work and the unequal power dynamics between Interplast personnel and our partners and beneficiaries, vulnerable people may be exposed to additional risks of gender-based violence and abuses of power. This further highlights our responsibility to ensure a proactive approach to protecting all people from sexual exploitation, abuse and harassment.

The purpose of the Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) Policy is to outline Interplast's principles, approaches and obligations to both preventing and responding to sexual exploitation, abuse and harassment of adults. This includes setting out the responsibilities of all Interplast personnel, observers and partners to abide by the PSEAH Policy as signatories to Interplast's Code of Conduct.

The PSEAH Policy also protects Interplast personnel, partners, and other stakeholders by providing clear boundaries and behaviour guidelines to avoid ambiguous situations that may be misinterpreted.

This policy is to be read and used in conjunction with Interplast's Safeguarding Procedure, which provides full details of this 'policy in practice' and outlines procedures related to:

- Recruitment and screening
- Training and development
- Code of Conduct
- International program planning and implementation
- Reporting and response processes
- Communication and marketing (including child photo and case study guidelines).

Section 2: Scope

The PSEAH Policy aims to protect adults from sexual exploitation, abuse and harassment. For concerns and incidents perpetrated against individuals under the age of eighteen years, please refer to Interplast's Child Protection Policy.

The PSEAH Policy applies at all times¹ to Interplast personnel, volunteers and observers involved in any Interplast activity (see Definitions in Section 8).

¹ While the expectation of this policy is that those who are bound by it adhere to the policy's principles and requirements at all times, Interplast recognises that it does not have visibility of the behaviour and actions of those individuals at all

This policy is also applicable to all local partners engaged in Interplast activities in the countries in which Interplast works, with this policy being referenced in all partnership agreements. All local partners must also abide by their own relevant policies, international declarations, conventions, agreements and domestic legal frameworks that relate to PSEAH.

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

Section 3: Guiding Principles

At Interplast, we are committed to:

- A zero tolerance for sexual exploitation, abuse and harassment: Interplast has zero
 tolerance for acts of SEAH, including zero tolerance for inaction to prevent, report and
 respond to acts or suspected acts of SEAH. Interplast will respond swiftly and effectively
 in accordance with the relevant domestic legal procedures and international obligations
 and practices in the case of any suspected or reported SEAH incidents or concerns.
- 2. A victim-survivor centred approach: Interplast maintains a 'do no harm' approach, prioritising the safety, rights, needs and wishes of the victim-survivor. Interplast recognises the need to inform victim-survivors throughout SEAH reporting processes, including involving them in decision-making and respecting their agency and dignity.
- 3. Embedding of SEAH and safeguarding principles and practices throughout Interplast's leadership and organisational culture: 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 and responding to SEAH. This includes allocating resources for safeguarding commitments and keeping up with safeguarding best practices.
- 4. Promoting a shared responsibility and a participatory approach to preventing and responding to SEAH: Interplast recognises that all stakeholders including community members and our partners play a vital role in preventing and responding to SEAH. Adopting a participatory approach, Interplast is committed to consulting stakeholders and partners in addressing SEAH in order to learn, share good practice and develop culturally relevant approaches to preventing, reporting and responding to SEAH in their organisations and communities.
- 5. Addressing inherent power imbalances and recognising how gender (and the intersection of other factors) increase the risk of SEAH: Interplast recognises that the

times. As such, the intent of this policy is to clarify that it is an expectation that these behaviors and actions are followed regardless of whether an Interplast activity is being undertaken, and if Interplast becomes aware of any breach of the policy, even outside of the delivery of an Interplast activity, then Interplast reserves the right to undertake sanctions against the individual.

- intersection of sex, gender, abilities, ethnicity and social, economic and cultural backgrounds can create increased risk and diverse experiences of SEAH. Efforts will be made to dismantle power imbalances and recognise the disproportionate impact SEAH has on women and girls.
- 6. A prevention focused and risk-based approach to SEAH: Recognising the importance of minimising the risk of SEAH and creating safe environments for all people, Interplast is committed to taking proactive action to prevent SEAH throughout all our policies, operations and programs. This includes tracking potential risks and incidents of SEAH, understanding specific risks in every context we work in, and improving prevention strategies and responses.
- 7. Mandatory and immediate reporting: Interplast will enforce mandatory and immediate reporting of all concerns, suspicions of, alleged and known incidents of SEAH. Interplast will also encourage reporting by providing clear and accessible reporting mechanisms and support for all who report, with efforts to dismantle barriers to reporting for victim-survivors, women and girls.

Section 4: Policy

4.1: Context and approach

Interplast believes that all people have the right to live their lives free from sexual exploitation, abuse, harassment and any abuse of power. Interplast recognises that by the nature of our work and in the countries that we work in, there is an increased risk of SEAH due to unequal power dynamics, including between Interplast personnel and our local partners and beneficiaries.

There are several significant factors in the way Interplast delivers its programs which are important to recognise to keep all people safe and free from SEAH:

- programs may involve Interplast personnel having direct contact with adults and vulnerable people that is of a clinical nature.
- programs may also involve indirect contact with adults and vulnerable people including the depiction of adults in a clinical setting (for example, use of case studies in medical training).
- as trusted and accessible professionals, local partners (often medical professionals), with whom Interplast works with to deliver programs, may also play a role in their local community in keeping all people safe.
- adults and vulnerable people who are not direct patient beneficiaries may also come into contact with our programs as family members of patients, or as people within the broader community where Interplast volunteer teams are visiting and working.

4.2: Organisational culture

Interplast will make every effort to create an organisational culture in which personnel, partners, and any people engaged in or as beneficiaries of Interplast's activities can feel safe and confident to take a proactive approach in preventing and responding to SEAH. Specifically, Interplast will:

- Ensure that the standards of ethical behaviour and conduct expected of Interplast personnel, observers and partners are readily available to stakeholders through Codes of Conduct, partnership agreements and policies through our website.
- Progressively build the capacity of Interplast personnel to comfortably discuss safeguarding and SEAH both internally and with our partners
- Provide opportunities for Safeguarding Focal Point to continue monitoring our progress and compliance regarding the prevention of and response to SEAH in line with current best practice.

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: Transactional sex and fraternisation

Recognising that a person can be sexually exploited through transactional sex, particularly where there are pre-existing power imbalances (including based on gender, age, ability, authority, social and economic inequality), Interplast is committed to the prohibition of transactional sex for all personnel and observers.

Interplast demonstrates this by ensuring:

- 1. Sexual exploitation, abuse and harassment by any Interplast personnel are constituted as acts of gross misconduct and are therefore grounds for immediate dismissal
- 2. Prohibition of the exchange of money, employment, goods or services or other advantages for sex or sexual acts, including sexual favours or other forms of humiliating, degrading or exploitative behaviour
- 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 local partners: Interplast recognises there are inherent power imbalances between aid and development organisation personnel and local partners, with this heightening the potential for exploitative fraternisation. 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 given the high-risk environments Interplast operates in.

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 personnel² 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.

4.4: Recruitment and screening

Interplast is committed to recruitment, selection and screening practices that protect all people from harm inflicted by Interplast personnel, observers and other associates, both intentionally and unintentionally. Interplast recognises that those who seek to harm other may specifically seek out positions with aid and development organisations, as this gives them an avenue to work within vulnerable communities. Interplast also acknowledges the inherent imbalance of power that exists between aid and development organisation personnel and their local partners and beneficiaries, which increases the risk of SEAH. As such, Interplast recruitment, selection and screening practices seek to reduce further risks.

² Interplast recognises that a number of its volunteer medical personnel are in or may be in a relationship with other volunteer medical personnel.

Interplast's commitment to safe recruitment, selection and screening practices is documented in detail in our Safeguarding Procedure. These apply to all Interplast personnel, observers and other associates, and include:

- addressing safeguarding and PSEAH in job advertisements and interviews, including with the
 use of targeted messaging and questioning about preventing and responding to SEAH. This
 occurs throughout the recruitment process and is included in onboarding and probation
 reviews.
- 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), working with vulnerable people checks or local equivalent, completed on commencement and at periodic intervals, relevant to their home Country and State (unless exempt)³
- reference checks including specific questioning about safeguarding and SEAH concerns or issues
- mandatory reading of Interplast's Child Protection and PSEAH Policies, and signing of the
 organisational 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)
- ongoing monitoring of all personnel of their adherence to Interplast's Child Protection and PSEAH Policies and Code of Conduct, including appropriate sanctions and termination of current and future engagements with Interplast where necessary

4.5: Training, awareness and development

As part of induction/onboarding and pre-mobilisation processes, all Interplast personnel and observers are provided with Interplast's PSEAH Policy and organisational Code of Conduct and relevant information pertaining to these documents. Included in this process is the requirement to complete Interplast's online Child Protection and Safeguarding training modules prior to commencement of engagement, and annually thereafter.

All employees and Board Directors will complete ACFID's Introduction to Safeguarding module in addition to this and provide evidence of course completion for Interplast records. All employees and Board Directors will also receive annual refresher training in preventing and responding to SEAH. Interplast's Safeguarding Focal Point will also be supported to attend safeguarding training opportunities delivered externally to remain informed on current best practice. Any information and learnings gained from these external training opportunities will be shared with others through team workshops and the Safeguarding Working Group.

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³ Suitable exemptions are exemptions granted to workers under relevant legislation, residents of overseas countries where no equivalent is available.

Volunteers, observers 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 on the prevention of and responding to SEAH during delivery of Interplast activities overseas.

All third-party individuals and/or organisations who have been granted authority to fundraise for Interplast, will be provided with a copy of the PSEAH Policy. Specific conditions related to the use of Interplast branding, including images and content depicting adults, will be stipulated within relevant contracts or agreements.

4.6: International programs and partnerships

In the planning and delivery of international programming, Interplast utilises a range of processes and tools to ensure the minimisation of risk of SEAH. This sits alongside similar processes and practices to ensure the safety of children, in line with our Child Protection Policy. This includes:

- undertaking a Child Protection and Safeguarding Risk Assessment for all activities
- ensuring that all program personnel and observers have been recruited, screened and trained in accordance with Interplast policy
- providing plain language and (where relevant) translated information on Interplast's PSEAH
 commitments and reporting mechanisms and support available for local partners and
 program beneficiaries in the course of activity delivery
- ensuring that program participants (employees, 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 safeguarding concerns, risks and incidents.

Interplast has a written agreement in place with all implementing partners, which includes expectations and obligations related to PSEAH. This includes being aware of and agreeing to comply with Interplast's PSEAH Policy and organisational Code of Conduct, including all reporting requirements as outlined in this policy. Furthermore, agreements stipulate a commitment to work with Interplast to ensure the prevention of, and response to, SEAH through the course of program activities. Interplast also works to the full extent of our influence, with local partners to strengthen their own PSEAH standards as appropriate to their context. Interplast also recognises and values the knowledge, expertise and skills of our partners in informing and guiding Interplast's prevention and response strategies to SEAH in a contextually relevant and culturally appropriate way.

4.7: Reporting and response processes

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

Our reporting and response processes for SEAH incidents aim to ensure procedural fairness for all parties, include trauma-informed responses and maintain transparency and timeliness in our investigation processes. These seek to encourage safe and accessible reporting for all and protect those who raise concerns, including for victim-survivors and women and gender diverse people who face unequal power imbalances that pose as barriers for reporting.

Any Interplast personnel, observers or local partners who develop a suspicion or awareness of a suspected, alleged or known case of sexual exploitation, abuse or harassment has occurred must report their concerns immediately to the Safeguarding Focal Point or the Chief Executive Officer (CEO). Reports may be emailed to the dedicated email address ceo@interplast.org.au, which is received by the CEO only.

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.

Failure to report any suspicion of abuse or exploitation of a child is a breach of this policy and could lead to disciplinary action being taken (see Section 6: Sanctions).

All incidents, allegations or suspicions of sexual exploitation, abuse and harassment must be made to DFAT immediately (within 24 hours) as per the mandatory reporting requirements outlined in the DFAT Protection from Sexual Exploitation, Abuse and Harassment Policy (2025). This is to be done using the DFAT Incident Notification Form

(https://www.dfat.gov.au/sites/default/files/seah-incident-notification-form.pdf) and emailed to seah.reports@dfat.gov.au. This applies regardless of how the activity was funded.

Any incidents or allegations that may involve a criminal aspect should also be reported through locally appropriate law enforcement channels.

Where a concern relates to suspected wrongdoing by the CEO, concerns must be raised directly with the President of Interplast's Board of Directors. The Interplast office can be contacted on 03 7042 5460, and a phone number or other contact method will be provided. Reports and concerns can be made in person, by telephone or in writing. Further details on this process can be found in the Safeguarding Procedure.

Any incidents, allegations or suspicions of child exploitation, abuse and harm may be reported to Interplast by members of the Australian public or other Australian or international stakeholders, including children. Interplast will ensure that organisational complaints mechanisms remain current, responsive, and accessible to all (including children). Reports will be handled in accordance with our Whistleblowing Policy and/or Complaints Handling Policy, as appropriate.

Interplast's Whistleblowing Policy and Safeguarding Procedure provide further information about the reporting and investigation of child protection incidents including:

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

Appendix A: includes a flowchart summary of the reporting process, including 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 Procedure.

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.

For any issues relating to concerns and incidents perpetrated against individuals under eighteen years of age, Interplast's Child Protection Policy becomes the primary policy document.

4.8: Communication and marketing

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

Interplast has a comprehensive Case Study and Photography Policy and associated procedures which detail specific requirements relating to the depiction of adults, processes relating to obtaining informed consent, and approval processes for use of images and stories. These requirements on the obtaining and use of adults' images align with the ACFID Code of Conduct (clause 6.2) the DFAT Protection from Sexual Exploitation, Abuse and Harassment Policy (2025) and its associated Use of Images and Social Media Guidance Note.

Further details can be found in the Case Study and Photography Policy and corresponding procedure.

Interplast will request the immediate removal of any images or personal information that is 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.

4.9: Codes of Conduct

Interplast maintains an organisational Code of Conduct which specifies the standards of behaviour that can be expected of all Interplast personnel, observers and associates engaged in Interplast activities, including in relation to all SEAH concerns and incidents. Prior to engagement in Interplast programs, all volunteers and observers are also required to read and agree to abide by our Program Participant Protocol and Agreement.

These agreements and codes of conduct support the PSEAH Policy by:

- Specifically outlining 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
- Being expressed in plain English and being readily available to review
- Being read and signed annually by employees, consultants and Board Directors. Volunteers and observers 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 breach of this Policy as part of their obligations under Interplast's Code of Conduct.

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 Chief Executive Officer and managed operationally by Interplast's Safeguarding Focal Point. The internal Safeguarding Working Group, which is represented by Interplast's programs, fundraising & communications and finance teams, will meet quarterly, to discuss the policy in practice and raise any areas of concern or suggest updates.

A two-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 Safeguarding Focal Point at any time. All Interplast personnel are encouraged to be proactive in identifying suggestions for improving safeguarding practices.

Section 6: Sanctions

Where there is an allegation of this policy having been breached by any Interplast personnel or observer, the Interplast CEO will consider sanctions that may include temporary or permanent 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 a victim-survivor is at risk, an employee may be suspended (on full pay), or a volunteer or observer may be removed 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 that this policy has been breached by an employee, and/or an employee has been found to have put any person at the risk of SEAH, the CEO will consider sanctions that include suspension, transfer, demotion and/or dismissal and legal recourse may be taken if appropriate.

A volunteer or program observer found to have breached this policy and/or put any person at the risk of SEAH, will not be accepted for any further Interplast activities and legal recourse may be taken if appropriate. This also applies to overseas residents or citizens (such as local medical personnel in a partner country) 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 an incident of SEAH has occurred, ongoing work with the partner cannot involve the individual(s) concerned. If there is reason to believe that an allegation of SEAH has been dealt with inappropriately by a partner, then they risk withdrawal of funding and/or ending of any existing or potential future partnerships with Interplast.

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. Sanctions may include voiding any ongoing partnership agreement or ceasing to accept donor funds.

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

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

Further details on disciplinary actions and relevant sanctions are outlined in the Safeguarding Procedure.

Section 7: Related Documents and Legislation

Interplast adheres to relevant safeguarding laws which prohibit the sexual exploitation, abuse and harassment of individuals, both in Australia and overseas. These include the laws in countries where Interplast's programs are implemented, and international laws and conventions in relation to sexual exploitation, abuse and harassment, as well as all forms of gender-based violence and abuses of power.

Interplast's PSEAH and safeguarding principles and practices are underpinned by those principles and practices outlined in the Department of Foreign Affairs and Trade (DFAT) Protection from Sexual Exploitation, Abuse and Harassment Policy.

Interplast principles and practices are also informed by the ACFID Code of Conduct, in particular, Commitment 1.5, We advance the safeguarding of those who are vulnerable to sexual exploitation, abuse and harassment.

Interplast also recognises, and where relevant to our work, is committed to upholding the following Australian legislation and strategies and international conventions and frameworks:

- The United Nations Universal Declaration of Human Rights 1948
- Common Approach to Protection from Sexual Exploitation, Abuse and Harassment (CAPSEAH) 2024
- Collective Statement of the Members of the Secretary-General's Circle of Leadership on the Prevention of and Response to Sexual Exploitation and Abuse in United Nations Operations
- Tidewater Joint Statement on Combating Sexual Exploitation and Abuse in the Development and Humanitarian Sectors
- Whistler Declaration on Protection from Sexual Exploitation and Abuse in International Assistance
- National Plan to End Violence against Women and Children 2022-2032
- Respect at Work Amendment Act 2021
- Work Health and Safety Act 2011
- Sex Discrimination Act 1984
- Modern Slavery Act 2018
- Fair Work Act 2009
- International Engagement Strategy on Human Trafficking and Modern Slavery: Delivering in Partnership 2022

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

Name of	Location/hyperlink
document/legislation	

Safeguarding Procedure	Interplast Key Documents
Child Protection Policy	Policies and Guidelines Interplast Australia
Whistleblowing Policy	Policies and Guidelines Interplast Australia
Complaints Policy	Policies and Guidelines Interplast Australia
Grievance Resolution Policy	Interplast Key Documents
Code of Conduct	Policies and Guidelines Interplast Australia
Program Participant Protocol and Agreement	Interplast Program templates
Incident Management Framework	Interplast Key Documents
Privacy Policy	Policies and Guidelines Interplast Australia
Recruitment Policy	Interplast Key Documents
Human Resource Manual	Interplast Key Documents
Induction Checklist	Interplast HR Templates
Equal Employment Opportunity & Anti- Discrimination Policy	Policies and Guidelines Interplast Australia
Case Study and Photography Policy	Policies and Guidelines Interplast Australia
Case Study and Photography Procedure	Interplast Key Documents
Ethical Fundraising Policy	Policies and Guidelines Interplast Australia
Common Approach to Protection from Sexual Exploitation, Abuse and Harassment (CAPSEAH) 2024	https://capseah.safeguardingsupporthub.org/common-approach
United Nations Universal Declaration of Human Rights 1948	https://www.un.org/sites/un2.un.org/files/2021/03/udhr.pdf

ACFID Code of Conduct	https://acfid.asn.au/code-of-conduct/	
DFAT PSEAH Policy	https://www.dfat.gov.au/sites/default/files/protection-sexual- exploitation-abuse-harassment-policy.pdf	

Section 8: Definitions

Word / Phrase	Definition
Personnel	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. 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.
Observer	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). Observers do not have a clinical role but may assist the clinical team by completing tasks related to program delivery.
Partner	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. Partner organisations may or may not be recipients of funds through Interplast.
Beneficiary	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 activity), or 2) local partner personnel or other participant participating in training delivered by Interplast.
Stakeholder	Stakeholders include all personnel, observers, partners, beneficiaries and 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 but is not limited to 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 all forms of sexual assault, rape, molestation and other forms of nonconsensual sexual activity. 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	Any 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 might be offended, humiliated or intimidated. Sexual harassment can take various forms. It can be overt, covert or subtle, physical or verbal, repeated or one-off and can happen in person, over the phone or online – including via social media.
Adults	Individuals over the age of eighteen years.
Victim-survivor	Describes a person under the age of eighteen years who is, or has been, abused, exploited or harmed. This term adopts a rights-based approach in acknowledging both the harm suffered as a victim, and the resilience and agency of the child in coping with the aftermath as a survivor.
Transactional sex	Transactional sex is a form of sexual exploitation in which sex, sexual relationships or sexual acts are exchanged for gifts, money, employment, goods or other services or other advantages. This can occur even in places where sex work is legal.
Fraternisation	Fraternisation refers to any intimate or social relationship that occurs in the course of conducting business. This could involve or appear to involve, preferential treatment, partiality or improper use of rank or position, including but not limited to consensual sexual behaviour.
Informed consent	Ensures the individual understand the implications, purpose and potential uses of photographs or videos.
Safeguarding	The process of taking measures to avoid or minimise negative impacts or potential negative impacts caused by our operations or activities. For the purposes of this policy, safeguards promote the welfare of children and/or other vulnerable people by minimising the risk of potential abuse, exploitation and harm.

Section 9: Appendices

Appendix A - Reporting Flowchart

Who can report?

- Children and vulnerable adults
- Parents, guardians, caregivers or family members of children or vulnerable adults
- Local partners
- Staff, volunteers, observers
- Members of the public

What needs to be reported?

Any concerns of or suspicions of allegations, disclosure or observation of exploitation, abuse and harm against children or vulnerable adults, and/or any violations of Interplast's Child Protection Policy, Child Protection Code of Conduct and Protection from Sexual Exploitation, Abuse and Harassment Policy.

When should it be reported?

All concerns must be reported within 24 hours (or as soon as practically possible) of any incidents occurring or from the time suspicions or concerns were raised.

Who acts on the report?

The CEO and/or Safeguarding Focal Point.

What will happen?

- Interplast CEO & Safeguarding Focal Point will be notified.
- DFAT must be notified within 24 hours using prescribed templates.
- A confidential incident report will be made in compliance with CP/PSEAH policies and/or within the context of local/state/country legislations.
- The situation and information will be assessed and investigated.

What are the possible outcomes?

- If the report is determined to be a criminal matter, then Child Protection and/or Protection from Sexual Exploitation, Abuse and Harassment reports are made to police and relevant authorities.
- Referral to medical, counselling, shelter or other services is offered to the victim-survivor.
- Further action is taken in accordance with Child Protection and/or Protection from Sexual Exploitation, Abuse and Harassment Policies and Interplast's Safeguarding Procedure.

What is communicated to involved parties?

• Results of the investigation will be provided to those directly involved or affected, whilst protecting confidentiality and privacy of both victim-survivors and the perpetrator.

- Feedback will be given to those directly involved or affected, as appropriate.
 Counselling assistance will be provided if needed.