

Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Guidelines

COMPLIANCE WITH THESE GUIDELINES IS MANDATORY

These guidelines support, and are to be read in conjunction with, the Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy.

The PSEAH Policy and Guidelines are based on the Save the Children International Protection from Sexual Exploitation and Abuse Policy which describes Save the Children's mission and commitment to safeguarding adults and communities in which we work.

MISSION STATEMENT

Save the Children aims to be a safe organisation for all. Everyone associated with Save the Children must be made aware of the risks of sexual exploitation, abuse and harassment (SEAH) for the communities we work with. Save the Children must do all that it can to prevent, report and respond to these issues.

Our representatives and partner staff will at all times demonstrate the highest standards of behaviour as outlined in these guidelines. The standards in these guidelines apply to both the private and professional lives of all representatives.

The purpose of these guidelines is to provide practical guidance on the application of the PSEAH Policy. These guidelines also cover adults living in communities where we operate, who may not directly be involved in Save the Children program activities, but may be impacted by our presence.

COMMITMENT TO SAFEGUARDING

The PSEAH Policy and Guidelines form part of Save the Children's wider safeguarding framework to preventing and addressing all forms of abuse and sexual misconduct committed by representatives or partners involved in the delivery of our work, as within our workplace. The policies are interlinked and underpinned by Save the Children's Code of Conduct.

The following sections provide guidance on the Policy Statements:

POLICY STATEMENTS	FOCUS FOR	PAGE
1. Behaviour boundaries	All	2
2. Reporting concerns	All	2
3. Personal commitment and learning	All	3
4. Workplace leadership & culture	Executive and People Managers	3
5. Risk management	Senior Advisers, Project Leads and Awards Staff	4
6. Safer partnerships	Senior Advisers, Project Leads and Awards Staff	4
7. Keeping individuals and communities informed	Program Staff	6
8. Victim/Survivor support and care	People Managers	6
9. Safer recruitment	People Managers	6
10. Responding and legislation and donor requirements	People, Culture & Risk Staff	7

POLICY STATEMENTS

1. Behaviour boundaries

The Save the Children Australia Code of Conduct governs the behaviour of representatives in their private and professional lives. It is expected that representatives will always conduct themselves in a manner consistent with the Code of Conduct and never abuse the trust that comes with being a member of Save the Children.

The following table provides guidance on appropriate PSEAH boundaries and practices.

☑ DO...	☒ DO NOT...
<ul style="list-style-type: none"> • Be proactive to seek out and listen to the views of the adults within the communities we serve; inform them of their rights and the behaviour and conduct they can expect from representatives and partner staff acting on our behalf. • Share the obligation to prevent, report and respond to sexual exploitation, abuse and harassment. • Always ensure the survivor/victim is protected and can access the supports available. • Display high standards of professional behaviour at all times and live Save the Children’s values. • Declare immediately any sexual relationships with people in my line of management (whether I directly line manage them or are further up the same management line) as this reduces the risk of any abuse of power in the workplace. • Immediately report any SEAH incidents, suspicion, or concern by a Save the Children representative or partner staff through the available reporting channels. • Disclose to Save the Children any civil judgement or criminal conviction that relates to allegations of SEAH which have occurred before or during tenure with Save the Children, as per the Safeguarding Reporting Process. • Make sure another adult is present when working with members of the community. • Consult with Save the Children local office and gain permission with regard to the taking of photographs for official Save the Children business, and adhere to relevant media and communication policies. • Check that the right safeguarding measures are in place and be aware of role and responsibility to keep communities safe when carrying out Save the Children’s work. • Understand and be aware of the risks and vulnerability of the different groups of adults Save the Children engages and comes into contact with, both physically or through digital technology. • Create and maintain a safe and equitable organisational culture that prevents and opposes sexual exploitation, abuse and harassment of individuals and communities. 	<ul style="list-style-type: none"> • Engage in exploitative or transactional sex¹ or engage the services of sex workers, irrespective of the local or national laws or norms regarding sex work, or the laws of their home country or the location in question. • Engage in fraternisation² – any relationship that involves, or appears to involve, partiality, preferential treatment or improper use of position including but not limited to voluntary sexual behaviour. • Engage in sexually abusive or exploitative relationships with individuals or members of the communities, within your private and professional life. • Infer, suggest, request, and/or demand any sexual favours from members of the communities in which Save the Children works, in return for anything – including protection, assistance or employment. • Engage in undeclared sexual relationships with employees from partners, including lateral partnerships such as those organisations we work with in consortia where Save the Children is providing funding to the other organisation. • Use Save the Children IT systems or Save the Children devices to access, store, send or publish: pornographic, sexually exploitative images or texts of any nature. • Use language or behaviour that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate. • Share personal contact details (email, phone numbers, social media contacts/platforms, address, webcam, Skype, Zoom etc.) with beneficiaries of Save the Children. • Fail to take corrective action to prevent and/or manage risk when designing and implementing Save the Children programs and activities. This includes research, advocacy, campaigns and media related activities and events, which directly involve individuals and communities. <p style="font-size: small; margin-top: 10px;">1 Definition transactional sex: The exchange of money, employment, goods or services for sex, including sexual favours.</p> <p style="font-size: small; margin-top: 5px;">2 Definition 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.</p>

2. Reporting concerns

Representatives and partner staff must immediately report any SEAH incidents, suspicions, or concerns by a Save the Children representative or partner staff using the Save the Children Australia Safeguarding Reporting Process.

What to report:

- Concerns about the behaviour of Save the Children Australia representatives involving adults or children,
- Concerns about the behaviour of a member of staff, or volunteers from a partner organisation,
- Concerns about the breaches of the Code of Conduct, Child Safeguarding Policy, PSEAH Policy, and/ or Bullying, Harassment, Discrimination and Exploitation Policy.

All suspected or known SEAH concerns must be reported by representatives and partner staff within 24 hours of becoming aware of the concern, unless it is impossible to do so, or other exceptional circumstances exist.

Any SEAH suspicion, concern or allegation must be reported through one of the official Save the Children reporting channels. All SEAH incidents will be reported quarterly to Save the Children Australia Board Programs & Risk Committee and Save the Children International.

3. Personal commitment and learning

Representatives and partner staff must:

- Formally commit to upholding the Save the Children Australia PSEAH practices.
- Equip themselves through professional seminars, team training days, supervised peer discussions and access to research and publications to build practical skills in being vigilant to the signs of SEAH and how to prevent and address abuse of power and inequities in relation to sexual misconduct of individuals and communities.

Formal commitment:

All representatives must sign (physically or electronically) prior to commencing their roles, the PSEAH Policy which acknowledges they have read, understand and agree to comply with Save the Children's PSEAH Policy and relevant guidelines.

PSEAH training curriculum:

The full training curriculum is detailed at Appendix 1.

4. Workplace leadership and culture

Save the Children Australia is responsible for providing a safe and healthy workplace where all representatives are encouraged to ask questions and provide feedback. The Executive and People managers must be proactive rather than reactive to addressing power imbalances in the workplace, gender equality and other social inclusion issues (e.g. actively promoting relevant policies and guidelines and good practice, and addressing issues raised in employee surveys).

5. Risk management

The Save the Children Australia Board has a stated risk appetite of zero tolerance regarding harm to children or adults caused by a Save the Children representative or partner staff. We will not knowingly take decisions that put children or adults at risk of harm. Any occurrence of the risk, no matter how small, will be treated seriously, assessed, mitigated and monitored. Save the Children Australia is fostering a risk aware culture through its Risk Management Policy, by ensuring:

- risk is considered in decision making – facilitating informed choices and prioritising actions
- systems are in place to drive accountability, authority and appropriate competence for managing risk
- that the necessary resources are allocated to responding to risks.

The Risk Management Policy is embedded into the approach to safeguarding through the following:

- Risk Management planning, processes, templates and toolkits are available to allow all types of risks, including SEAH risks, to be considered together and used prior to the activity commencing, and used in an ongoing process of risk monitoring and evaluation.
- Collaboration with other organisations, partners, suppliers and stakeholders, and engage with local people and communities throughout the project cycle.
- Projects and activities must be properly designed, resourced and have measures in place to prevent and mitigate the risk of SEAH, at every stage of the project cycle from inception to closure.
- All information systems and communication technologies, including the internet, social networking sites and the use of digital imagery is risk assessed.
- Ensuring no identifying information – names, images, geographical location, etc. – of victims/survivors will be used in any communications, publicity, or fundraising materials. This includes information that may support the identification of a victim/survivor through multiple small pieces of information. Consent to use a survivor’s words or story must not be confused with consent to use any aspect of their identity.
- Compliance with policy and processes is monitored at the country, regional, Save the Children International (SCI) Headquarters and Save the Child Australia, through reviews and a program of safeguarding spot checks.

6. Safer Partnerships

Program managers must ensure appropriate support is provided to downstream partners with the skills, capacity and systems to fulfil their responsibilities consistent with the PSEAH Policy and Safer Partnerships 12 universal requirements and tools. For programming outside of the Pacific and Australia, this support will primarily be provided by SCI Country Offices.

Save the Children defines a partnership as a long-term relationship between two or more partners (individuals or organisations) with a mutually agreed set of principles and accountabilities, working towards defined objectives that facilitate lasting change for children. The relationship may or may not involve a transfer of resources (cash or in-kind assistance) and will stem from:

- donors providing funds or raising funds on our behalf
- individuals or organisations advocating with us or implementing our programs
- suppliers providing us with goods and services.

PSEAH is embedded into implementing partners and their staff and representatives through the following:

- At the appropriate point in award/program cycle and upon identification of a potential partner, a capacity assessment and strengthening plan to be developed by the Country Office/Program in collaboration with the partner agency. At the Go/No Go stage, consideration must be given to existing or future partners' safeguarding capacity and awareness.
 - To ensure accountability in the partnership and accountability to communities, a partnership agreement (Memorandum of Understanding/Sub-award Contract) is needed between the Country Office and prospective partner that follows the Contract Standard and reflects:
 - principles of information sharing and joint decisions (e.g. participating in key meetings such as kick-off), handling complaint/disputes and monitoring and evaluating the arrangement in the context of the broader program.
 - acknowledgement of compliance with Save the Children Australia's PSEAH Policy including sub-award partners developing their own PSEAH Policy. Relevant compliance obligations such as the ACFID Code of Conduct and DFAT minimum partner requirements must be passed through to the partner in the agreement.
 - agreed procedures for reporting and investigating concerns involving breaches of the policy, including: how partners may provide feedback, raise complaints and receive a response through an effective, accessible and safe process, what happens to partner staff when a report is made e.g. suspension/termination, etc.
 - When Save the Children partners with governments and multilateral organisations a risk assessment must be completed and where appropriate:
 - agree and provide a feedback and reporting mechanism for beneficiaries to report concerns of safety or unacceptable behaviour by staff.
 - develop an information sharing protocol – which provides a mechanism where relevant government and non-government agencies exchange information that will support a more coordinated, response to concerns of SEAH.
 - Country Offices must ensure partners are subjected to background and vetting checks, and partner staff must be subjected to appropriate screening.
 - As part of the implementation of Monitoring, Evaluation, Accountability and Learning (MEAL) plan, a partnership monitoring plan is required, including components for: the project (activity and budget), the relationship (survey), donor and beneficiary accountability (analysis of concerns/feedback), and partner capacity progress (from capacity plan). Country Office visits include visiting implementing partners to carry out monitoring activities from the plan.
 - The Safer Partnerships Core Standards are the minimum requirements to which each project that is implemented in cooperation with a partner must adhere to. The standards are developed to create transparency, to prioritise the most important measures and to enable monitoring based on objective measurable standards. *[Note: the rollout of Safer Partnerships commences in Quarter 3 2021]*
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7. Keeping individuals and communities informed

To ensure individuals and communities who Save the Children supports are appropriately informed, a two-way communication process must be used, including:

- Providing individuals and communities with timely information at program/activity registration and visible information (e.g. posters, leaflets and internet content), about:
 - the feedback and reporting mechanisms, policies, programs and activities, in a form and language that is understood, culturally sensitive and is adapted to the needs of the beneficiaries.
 - commitment to PSEAH and what this means; and what is acceptable behaviour.
 - seeking out the views, and involvement of individuals and communities on issues that impact them e.g. through surveys and focus groups.
 - Making contact as soon as a problem is identified and reporting back on outcomes.
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8. Victim/Survivor support and care

Save the Children has adopted a survivor-centred approach to safeguarding reporting and investigations, which places the victim/survivor's experiences, considerations and needs at the centre of our processes, elevates the voice of victims/survivors, and places their wishes, rights, dignity, safety, and wellbeing at the forefront of efforts to prevent and respond - from initial reporting, through to investigation and follow-up actions.

This approach:

- Reflects a commitment to providing available support and assistance to complainants and to anyone who experiences sexual exploitation, abuse and harassment by representatives or partner staff. This may include medical treatment, accessing legal assistance, and psychosocial support and protection services.
 - Ensure support is offered regardless of whether a formal complaint is raised or not, and is in accordance with the needs expressed by the victims/survivors themselves.
 - Will offer support through the same channels to representatives and partner staff as far as practicable. Victims/survivors, witnesses, complainants and those accused of sexual misconduct can choose when they would like to take up the support options available to them.
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9. Safer recruitment

Recruitment and selection of representatives must reflect Save the Children's commitment to safeguarding by ensuring robust recruitment measures are adopted.

Recruitment practices include:

- People managers ensuring appropriate checks and monitoring are used to identify suitable representatives and deter unsuitable candidates and provide adequate professional supervision and development for all staff and volunteers.
- Obtaining the most thorough criminal background checks available in each jurisdiction, employment references from official sources and thorough interviewing to screen out anyone who may be unsuitable to work with individuals and communities.

- Candidates declaring in writing – prior to commencing their roles - their commitment to follow safeguarding policies and procedures and made aware of the binding nature of these policies, procedures and codes of conduct, which apply equally to personal and professional life, unless this is specifically prevented by local legislation.
- Reserving the right to terminate contract negotiations or refuse to engage an individual, if appropriate criminal record checks are not undertaken, or cannot be undertaken for the roles that have contact with individuals and communities. This will apply in the event where background and reference checks reveal that the person is not suitable to work with Save the Children or has omitted key information.
- Seeking to employ and contract people who are aligned with our vision, mission and values and using all possible means within our jurisdiction to share information across Save the Children or other organisations, which may assist in preventing the engagement in Save the Children of anyone who may directly or indirectly pose a risk of harm to the communities we serve.
- Sexual exploitation, abuse and harassment by representatives and partner staff, constitutes acts of gross misconduct and may be grounds for termination, criminal proceedings or referral to enforcement agencies. This includes anyone involved in our international development, humanitarian work, advocacy, campaigns and supply chain.

Refer to [Recruitment Standards](#), [Interview Guide](#), [Safeguarding Compliance Standards](#).

10. Responding and reporting

Save the Children will manage and maintain robust and accountable reporting and case management systems of all allegations of SEAH made against representatives and partner staff engaged in its activities. All SEAH suspected or known concerns must be reported by representatives and partner staff, in accordance with the Save the Children Australia's Safeguarding Reporting Process – Refer to Annex 1.

Key reporting elements include:

- All SEAH suspected or known concerns must be reported by representatives and partners staff and within 24 hours or as soon as possible of becoming aware, unless it is impossible to do so or other exceptional circumstances exist.
- Any SEAH suspicion, concern or allegation must be reported through one of the official Save the Children reporting channels. Refer to Save the Children Australia's Safeguarding Reporting Process: [Safeguarding Reporting Process](#).
- The Safeguarding team will notify donors within 2 working days of any SEAH allegation.
- Save the Children is responsible for managing and maintaining robust and accountable reporting and case management systems of all allegations of SEAH made against any of its representatives or partner staff engaged in its activities.
- Recognising the rights of everyone involved, safe and discreet investigations will be conducted via trained investigators, working with the support and oversight from the Safeguarding team.
- The decision-making process is subject to scrutiny by the appropriate senior management team and when required, by the Board.
- Any information relating to a suspicion of SEAH must be treated with utmost confidentiality and not be shared with any third party other than those identified as part of the defined reporting channels.
- All safeguarding incidents (de-identified) are reported to the Save the Children Australia Board.

- Representatives, partners and beneficiaries can access the Whistleblower reporting line, as a protected disclosure mechanism, when a person feels unable to raise a concern through standard feedback channels because of reasonable grounds of fear of reprisal.

Refer to: <https://savethechildren-australia.whispli.com/save-the-children-au>

All relevant laws related to protection from sexual abuse, violence and harassment, and those outlining measures for reporting known, or alleged cases of abuse will be applied. This includes:

- All relevant Australian laws related to protection from sexual abuse, violence and harassment, and those outlining measures for reporting known, or alleged cases of abuse.
- Applicable laws in the countries where Save the Children operates.
- Where the PSEAH Policy or Guidelines exceed any legal requirements, Save the Children will adhere to the standards in the policy to the extent allowed applicable by law.
- Save the Children will report criminal behaviour to relevant authorities, except where doing so will create additional harm for a victim/survivor and/or others.

Save the Children is committed to socialising recommendations and/or lessons learned from alleged incidents to:

- improve systems and mechanisms to safeguarding
- reduce the risk or re-occurrence of incidents
- influence policy, procedures and practice to correct any system weaknesses and/or gaps
- create a better understanding of the risks and impact of SEAH on individuals, organisations and communities.

Refer also to the [Safeguarding Procedure](#).

PREVIOUS VERSION	CURRENT VERSION	COMMENTS	AUTHOR	APPROVED BY EXECUTIVE COMMITTEE	REVIEW DATE
1.0	1	New document issued	Head of Safeguarding	25 May 2021	Q2 2022

APPENDIX 1 – PSEAH TRAINING CURRICULUM

TRAINING	WHO SHOULD ATTEND THIS TRAINING?	LEARNING OBJECTIVES	2021/22
<p>Prevention of Sexual Abuse, Harassment, and Exploitation</p> <p>Must be undertaken within 3 months of joining and refresher every 2 years.</p> <p>Facilitator: Head of Safeguarding & Gender Technical Advisor</p>	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Permanent employees <input checked="" type="checkbox"/> Relevant Social Enterprises <input checked="" type="checkbox"/> Casuals <input checked="" type="checkbox"/> Short-term Consultants <input checked="" type="checkbox"/> Volunteers 	<ul style="list-style-type: none"> • Recognise potential indicators and violations of SEAH • Explore gender bias and understand how this influences beliefs and decisions • Know how to identify, report and respond to SEAH concerns. 	<p>Available virtually bimonthly</p> <p><i>All staff can access for career development</i></p>
<p>Safer Partnerships (2 hours)</p> <p>Facilitator: Head of Safeguarding</p>	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Pacific country office project staff <input checked="" type="checkbox"/> Award Staff AS & IP <input checked="" type="checkbox"/> Project Leads AS & IP 	<ul style="list-style-type: none"> • To understand the Safer Partnerships approach to safeguard children, adults and staff on partner led implementation projects. • To learn how to use the Safer Partnership implementation tools 	<p>Q3</p> <p>Available Online</p> <p><i>All staff can access for career development</i></p>
<p>Safeguarding Briefing (30 mins)</p> <p>Facilitator: CO HR Lead</p>	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> All Pacific country office staff <input checked="" type="checkbox"/> All consultants working in Pacific countries 	<ul style="list-style-type: none"> • To understand what we mean when we use the term 'safeguarding'. • To understand the standards expected of representatives at all times and know which policy to use if they have any safeguarding suspicions and concerns. 	<p>Face to Face</p>
<p>Safeguarding Briefing</p> <p>Facilitator: Head of Safeguarding</p>	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Board members 	<ul style="list-style-type: none"> • To provide a briefing on PSEAH Policy and Guidelines 	<p>(Q2 2021)</p>