

# Preventing Sexual Exploitation, Abuse, and Harassment policy

## 1. Purpose

HHUG's Preventing Sexual Exploitation, Abuse, and Harassment policy (PSEAH) is underpinned by HHUG's commitment to respecting, protecting and promoting human rights for all, regardless of race, religion, ethnicity, indigeneity, disability, age, displacement, caste, gender, gender identity, sexuality, sexual orientation, poverty, class, or socio-economic status.

This Policy outlines HHUG's approach to prevent and manage Sexual Exploitation, Abuse and Harassment (SEAH) incidents and reports across the organisation.

## 2. Scope

The PSEAH policy applies to HHUG personnel, including; employees, volunteers, members, board members, contractors, interns, accompanying dependents of personnel, visitors, partner organisations during the delivery of HHUG's work, both within the Northern Rivers region and across Australia and the communities in which we operate, including outside of office hours when travelling in country or in communities eg: field trips.

The policy covers incidents related to HHUG project participants, community members, all personnel, accompanying dependents, and partner organisations related to HHUG's work or related activities.

## 3. Definitions

**CHILD/CHILDREN:** In accordance with the United Nations Convention of the Rights of the Child, 'child' means every human being under the age of 18, unless earlier under the law applicable to the child. HHUG considers a child to be a person under the age of 18 years.

**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

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relationship involving public displays of affection or private intimacy and the public expression of intimate relations.

**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 is considered to be sexual abuse.

**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 HARASSMENT:** A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favours, or engages in other unwelcome conduct of a sexual nature, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.

Sexual harassment can take various forms. It can be obvious or indirect, physical or verbal, repeated or one-off and perpetrated by any person of any gender towards any person of any gender. Sexual harassment can be perpetrated against project participants, community members, citizens, as well as staff and personnel.

Some examples of behaviour that may be sexual harassment include:

- staring or leering
- unnecessary familiarity, such as unwelcome affection or touching
- suggestive comments or jokes
- insults or taunts of a sexual nature
- intrusive questions or statements about your private life
- displaying posters magazines or screen savers of a sexual nature
- sending sexually explicit emails or text messages
- inappropriate advances on social networking sites
- accessing sexually explicit internet sites
- requests for sex or repeated unwanted requests to go out on dates and
- behaviour that may also be considered to be an offence under criminal law such as physical assault, indecent exposure, sexual assault, stalking or obscene communications.

**TRANSACTIONAL SEX:** The exchange of money, employment, goods or services for sex, including sexual favour

**VICTIM/SURVIVOR:** A person who is, or has been, sexually exploited, harassed or abused.

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## 4. Policy

### 4a. Policy Statement

HHUG upholds the right of all people to live a life free from sexual violence, exploitation, and harassment regardless of their gender, age, sexual orientation, disability, religion, or nationality. HHUG has zero-tolerance for SEAH of any kind. We recognise that some individuals within communities may be more vulnerable to SEAH, including; children and vulnerable adults. We are committed to creating a safe and supportive environment that safeguards all the people we work with, and the communities we work for.

We recognise that our personnel and organisation hold a privileged position in our work and that there are unequal power dynamics within our organisations and the communities, we work with. We understand that we are trusted by project participants, communities, partner organisations, personnel, donors, and members of the public to take reasonable measures to prevent, manage the hazards involved in the delivery of our work and appropriately investigate and report incidents if they occur.

HHUG is committed to prevention through awareness-raising and building our safeguarding capacity. HHUG will not tolerate personnel or partner organisations associated with the delivery of its work engaging in activities related to SEAH. HHUG expects all personnel to uphold our values and standards of behaviour as representatives of our organisation. HHUG personnel are required to contribute to creating a safe and supportive culture where individuals are comfortable to raise concerns and feel assured that all reports will be handled sensitively and appropriately.

### 4b. Guiding principles:

- **Safeguarding adults and children:** HHUG recognises intersections between poverty, vulnerability, and discrimination. We also recognise the inequality between genders, between community development practitioners, volunteers and beneficiary communities, and the unequal power dynamics, which may also exist within an organisation. We recognise that intersections between these factors may create a vulnerability to SEAH. HHUG expects personnel in all their interactions to respect diversity, promote gender equality, social inclusion, encourage accountability, and to take a strong "do no harm" approach.
- **Act to prevent and report SEAH:** HHUG requires that all personnel and partner organisations take measures to prevent the occurrence of SEAH. All personnel and partner organisations are required to report any suspicions or SEAH concerns related to HHUG activities or work.
- **Shared responsibility and accountability at all levels of the organisation:** All HHUG personnel at all levels of the organisation and partner organisations, have a responsibility to contribute to a culture which prevents and encourages reporting of SEAH. Managers at all levels are responsible for support and overseeing the implementation within their respective

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areas, while the Board and relevant manager/coordinator have overall accountability for the implementation of the policy.

- **Transparency and accountability:** HHUG is committed to ensuring that project participants, personnel, partner organisations and members of the public are able to access information on our policy and know how to report incidents or concerns related to HHUG’s work. Information is made accessible through HHUG contacts and will be translated into local languages whenever required. HHUG treats any reports, investigation, maintaining confidentiality and procedural fairness seriously.
- **A survivor-centered approach:** HHUG prioritises the rights, wishes, needs, and empowerment of survivors of SEAH in both the prevention of and response to SEAH incidents.

#### 4c. Working with Partner organisations

HHUG requires that all partner organisations working with HHUG have an equivalent standard of and commitment to safeguarding practices to prevent sexual exploitation, abuse, and harassment. HHUG’s partnership and project agreements outline each parties’ responsibilities within the partnership. The project manager develops, implements, and monitors the implementation of the risk management strategies on projects. Managers are responsible for ensuring projects and partnerships comply with HHUG's policies.

The partnership agreements outline the process for any breaches of the terms of the agreement, including; failure to report any incidents or concerns regarding PSEAH or failure to take corrective action if SEAH has occurred may result in termination of the agreement and partnership. All levels of staff are required to report any concerns or breaches of the agreement or code.

#### 4d. Standards of conduct

HHUG personnel, accompanying dependents, and partner organisations must abide by PSEAH standards of conduct listed below.

- HHUG sets high expectations of all personnel and prohibits SEAH related behaviours.
- HHUG has zero tolerance for sexual exploitation, abuse, and harassment of any kind.
- HHUG prohibits transactional sex (the exchange of money, employment, good or services for sex, including sexual favours) while engaged in the delivery or related to HHUG programs or activities.
- HHUG prohibits 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) while engaged in the delivery of HHUG programs and activities. HHUG personnel or related parties must inform their HHUG contact or manager regarding existing or emerging relationships.
- HHUG requires personnel to disclose all charges or convictions related to Child Abuse or SEAH that occurred prior or occurs during my engagement with HHUG.

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- HHUG requires personnel to report any concerns, suspected or alleged incidents of Child Abuse or SEAH or breaches of HHUG policies or procedures related to HHUG’s work or activities.
- HHUG has zero tolerance for all forms of exploitation, abuse, harassment or harm of children and requires all personnel and partner organisations to report any concerns. See Child Protection Policy for SEAH related to children.

#### 4e. Recruitment, screening, and training

HHUG is committed to undertaking robust recruitment, screening, and training processes to ensure the engagement of appropriate personnel for delivering HHUG’s programs in Australia and overseas. HHUG’s recruitment and screening processes include: police checks and working with children checks as required for the role, verbal referee checks, reference checks, and behavioural interview questions.

#### 4f. Reporting

HHUG aims to create a safe and supportive environment where personnel, partner organisations, dependants of personnel, project participants, and members of the public can raise concerns. All HHUG personnel in Australia and countries of operation are required to report concerns or incidents regarding SEAH immediately. HHUG takes all reports seriously and will respond immediately.

Individuals reporting SEAH in good faith or assisting investigation processes will be supported and protected by this policy without fear of retribution. Malicious reporting to harm another person's reputation or integrity will be treated as a conduct breach.

What to report	Who to report to and when
<b>For reports of exploitation, abuse or harassment of individuals under the age of 18 years</b>	<b>Follow the reporting process and timeframes</b>
Allegation, disclosure, or witness of sexual exploitation, abuse, or harassment involving; a beneficiary, HHUG personnel, community member, or person, partner organisation involved in HHUG’s work or related activities.	<ol style="list-style-type: none"> <li>1. Program Manager/ Country Manager/ or Head of Department immediately</li> <li>2. The report will be escalated to the Board. Reports made to local authorities as required.</li> </ol>
Breach of conduct, policy non-compliance, or concerns regarding PSEAH implementation of HHUG work or related activities.	<ol style="list-style-type: none"> <li>1. Program Manager/ Country Manager/ or Head of Department immediately</li> <li>2. Report will be escalated to Board.</li> </ol>
Other concerns outside of those listed and for advice regarding SEAH	<ol style="list-style-type: none"> <li>1. Program Manager, Head of Department</li> </ol>

\*Reports or concerns may be made through the contact details on HHUG website or directly to HHUG’s HR personnel via [hr@hhug.org.au](mailto:hr@hhug.org.au).

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#### 4g. Complaint handling and investigations

Any person can report a safeguarding concern either verbally or in writing to any HHUG employee, Management Team, or Board member or use the website contact page.

- All reports will be responded to in a professional and timely manner.
- All concerns or allegations will be taken seriously and investigated and acted upon where appropriate.
- All PSEAH reports will be treated with respect, sensitivity, and confidentiality, and reports de-identified as aligned with a survivor centred approach.
- HHUG will carry out a respectful and discreet investigation which; follows due process, ensures the duty of care to all involved, and is guided by the wishes of the survivor.
- HHUG will protect the privacy of alleged perpetrators, victims/survivors, and whistle blowers.
- HHUG will report any incidents that involve a criminal aspect to the correct local law enforcement authorities in the country where the individual works and country of residence where it is safe to do so and is in accordance with the wishes of the victims/survivors.
- For any reports or incidents related to children under 18 years of age, follow the reporting process and timeframes outlined in the Child Protection Policy.
- Any reports which do not fall within the scope of the policy will be assessed and referred to another organisation or community member.

HHUG will provide referrals as appropriate including medical services, psychosocial support services, or to specialised children’s or women’s services. Survivors will be provided with information on the progress of an investigation and outcomes.

#### 4h. Breach of HHUG PSEAH Policy

All individuals and groups listed under the scope of the policy are required to comply with and report any breaches of the PSEAH Policy or Child Protection Policy.

Failure to comply with or report breaches of these policies may result in disciplinary action, suspension, dismissal, or termination of engagement as outlined in the Child Protection Policy, employment contracts, and Partnership agreements.

Criminal activities or conduct will be reported to the relevant authorities, both in Australia and countries where the individual works, where it is safe to do so, required by local legislation and is in accordance with the wishes of the survivor.

#### 4i. Organisational Accountability

<b>HHUG Board</b>	<ul style="list-style-type: none"> <li>• Overall accountability and responsibility for this policy and its implementation</li> </ul>
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<b>HHUG Operations Manager</b>	<ul style="list-style-type: none"> <li>• Accountability and responsibility for ensuring the policy is implemented within all departments and programs.</li> <li>• Ensure PSEAH incidents are appropriately managed and responded to.</li> <li>• Support response to SEAH incidents, concerns, and reports. Conduct initial due diligence on the report, coordinate investigation or liaise with internal reporting structures or external investigator if required.</li> <li>• Raise awareness of SEAH across organisation and support departments to embed safeguarding and safe programming practices.</li> </ul>
<b>HHUG Management Team</b>	<ul style="list-style-type: none"> <li>• Promote awareness of the PSEAH policy</li> <li>• Responsible for the oversight, implementation, and contributing to the development of systems to ensure PSEAH practices are embedded in their work.</li> <li>• Ensure that staff have access to information.</li> <li>• Oversight of risk management strategies and processes</li> </ul>
<b>HHUG Program Teams</b>	<ul style="list-style-type: none"> <li>• Promote awareness of the PSEAH policy</li> <li>• Responsible for implementation and contributing to the development of systems to ensure PSEAH practices are embedded in their work.</li> <li>• Contribute to organisational reviews of the PSEAH and program-related procedures.</li> <li>• Ensure relevant all Partner organisations, volunteers, and other persons involved in HHUG activities have an awareness of HHUG’s PSEAH policy, how to implement risk management strategies, and report any concerns.</li> </ul>

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	<ul style="list-style-type: none"> <li>Implement risk management strategies and processes</li> </ul>
<b>All HHUG personnel; Staff Members, Contractors, Consultants and Volunteers, etc</b>	<ul style="list-style-type: none"> <li>All HHUG personnel are required to comply with the PSEAH policy and procedures.</li> <li>Report any incidents, concerns, or breaches of the policy immediately to relevant HHUG staff.</li> </ul>

#### 4j. Safe Programming and risk assessments

HHUG recognises that our work in communities both in the Northern Rivers and across Australia has a number of potential hazards to project participants of all genders, vulnerable adults, and personnel in delivering our programs. HHUG personnel are required to consider and implement strategies in their programs, activities, and areas of work to prevent incidents of SEAH.

To achieve this, the relevant Program Manager will:

- Assess the Sexual Exploitation, Abuse, and Harassment (SEAH) risk in existing and emerging programs (and in the communities in which they are implemented). Risk considerations should be continuously monitored in existing program risk assessments.
- Manage SEAH risks identified in its programs through the implementation of PSEAH measures (outlined within this PSEAH policy), and take actions as required.
- Continually assess and actively minimise situations where individuals are exposed to the risk of SEAH.
- Conduct induction for new staff and visitors and provide regular training sessions for local office staff on HHUG's PSEAH policy.

#### 4k. Communications and Monitoring and Evaluations

HHUG is committed to developing materials to support the communication of HHUG's approach to PSEAH, behavioural expectations of personnel, and reporting processes.

The policy is applied through our project management and monitored through project and management reporting. The policy is reviewed at a minimum of every 3 years.

#### 4l. Alignment with international laws and conventions

HHUG complies with the Department of Foreign Affairs and Trade (DFAT) PSEAH requirements, Australian Council for International Development (ACFID) quality principles, Australian and local legislation, and continuously works to strengthen our safeguarding capacity across the organisation. Related Laws International Conventions; International Bill of Human Rights, The UN Convention on



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the Elimination of all Forms of Discrimination Against Women, The UN Convention on the Rights of the Child, Australian and local legislations in the regions in which we operate.

## 5. Version Control.

**HHUG** will review and update this policy every three years, unless changes are required earlier, to ensure relevance and applicability.

	Updated By:	Reviewed By:	Approved By:	Next Review Date:
Person	HHUG Director Ella Rose Goninan	HHUG Director Luke Jaaniste	HHUG Board	
Date	25/06/2022	07/07/2022	12/07/2022	July 2025