

## 1. Purpose

Edge Effect takes a zero-tolerance policy towards instances of and inaction against Sexual Exploitation, Abuse and Harassment (SEAH). We believe that all people have a right to live their lives free from sexual violence and any abuse of power regardless of age, gender and gender identity, sexuality and sexual orientation, sex characteristics, disability, religion or ethnic origin. Edge Effect commits to supporting survivors, improving safeguarding capacity, reporting, investigating, responding to, and preventing sexual exploitation, abuse and harassment. This policy and associated procedures seek to ensure that:

- No person experiences sexual exploitation, harassment or abuse in association with Edge Effect activities.
- Any suspected or alleged sexual exploitation, harassment or abuse is reported quickly and through the correct channels to avoid further exploitation or abuse.
- Perpetrators of sexual exploitation, harassment or abuse are referred for external criminal or civil redress.
- Victims / Survivors of sexual exploitation, harassment or abuse are prioritised
- Policy breaches are identified, and disciplinary action taken to address those breaches.
- Limitations of this policy and Edge Effect procedures are identified and addressed.

## 2. Key Definitions

The following key definitions are from the Australian Government DFAT [PSEAH Policy](#):

“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 Australian Capital Territory 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.”

### **3. Compliance and Responsibility**

All Edge Effect office-bearers, staff, consultants, and volunteers, and Edge Effect partners have shared responsibility for ensuring that this policy is followed, and to ensure that suspected or alleged instances of sexual exploitation, harassment or abuse and suspected or alleged breaches of this policy are reported at the earliest opportunity.

Prior to participation in Edge Effect activities, office-bearers, staff, consultants, and volunteers must read and sign a copy of this policy to agree that a) they understand all aspects of the policy and b) they will be bound by this sexual exploitation, harassment, or abuse policy. Partners implementing activities on behalf of Edge Effect must also agree to be bound by this policy, and to provide their organisational sexual exploitation, harassment or abuse policy and compliance procedures to Edge Effect.

Failure to report to a relevant person suspicion of SEAH relating to someone else is a breach of Edge Effect's policy, and could lead to disciplinary action being taken against office-bearers, staff, consultants, and volunteers and the termination of Edge Effect's relationship with non-employees.

### **4. Recruitment and Criminal Background Check**

Edge Effect is committed to prevent perpetrators of SEAH from being hired, or rehired. Edge Effect Directors will ensure robust recruitment screening processes. All office-bearers, staff, consultants, and volunteers must undergo the AFP Criminal Background Check prior to their engagement with Edge Effect, and after every 2 years after engagement. If the office-bearer, staff, consultant, or volunteer resided overseas for more than 12 months in any one country, a criminal background check from local authorities should also be provided. For instances where a criminal background check cannot be obtained, a statutory declaration may be provided. However, provision of a statutory declaration should not become a default standard and will only be accepted if: a) genuine effort is made to obtain the check, b) compelling reasons are provided why a check cannot be sought, or c) the engagement requires immediate deployment, a criminal background check is in process, and is provided within 28 days. All reference checks will explicitly seek information on past compliance with SEAH policies.

### **5. Safe Partnership Agreements**

Edge Effect will ensure that, when engaging in partnerships, sub-grant or sub-recipient agreements, these agreements: a) incorporate this Policy as an attachment; b) include the appropriate language requiring organisations and individuals, and their employees and volunteers abide by a Code of Conduct that is in line with the standards of this policy and c) expressly state that the failure of those organisations or individuals, as appropriate, to take preventative measures against sexual exploitation, abuse and harassment, to investigate and report allegations or to take corrective actions when SEAH has occurred, shall constitute grounds to terminate such agreements. D) Edge Effect will include assessments on partner capability including existing safeguarding policies,

procedures and training and where not in place, will provide capability building and support as part of entering into any new partnership.

## 6. Staff and partner training

Edge Effect office-bearers, staff, consultants, and volunteers must receive as part of their induction training on PSEAH and Safeguarding when they join Edge Effect, including briefing on Edge Effect's policies and values, the Code of Conduct, information about how to report concerns, and advice about where to seek further information about how to report concerns, and advice where to seek further information about safeguarding and safer practices across the organisation. Anyone working directly with community members on behalf of Edge Effect must receive additional training on how to receive complaints and handle them in a safe and confidential manner.

## 7. Accountability to the communities we work with

Edge Effect works with people with diverse Sexual Orientations, Gender Identities, Expressions and Sex Characteristics (SOGIESC) who are often marginalised and vulnerable. Edge Effect commits to promoting accountability towards individuals and the communities we work with by; a) being transparent about Edge Effect programming, activities and services they are entitled to; b) raising awareness about Edge Effect's Code of Conduct, safeguarding policies and reporting channels; c) presenting feedback to communities on what changes have been made from community feedback.

## 8. SEAH Risk Assessment

Edge Effect takes a risk-based approach to SEAH. Edge Effect office-bearers, staff, consultants, and volunteers will assess the level of risk for SEAH and apply Minimum Standards adopted from DFAT commensurate with the level of risk identified. The higher the risk, the greater the controls required. If no risk is identified, then no minimum standards need to be applied under this Policy; this should be documented in accordance with Edge Effect risk management practices and be agreed by the Edge Effect Directors. The risk of SEAH will be monitored throughout activity delivery, as part of standard risk management practices. If Edge Effect determines a risk of SEAH exists, the level of risk (low, medium, high or very high) must be established based on the likelihood and consequences of the risk occurring.

Using a risk-based approach, the DFAT PSEAH Minimum Standards are applied commensurate with the level of risk identified.

- Low Risk – apply minimum standards 1 and 2
- Medium Risk – apply minimum standards 1-3
- High Risk – apply minimum standards 1-5
- Very High Risk – apply minimum standards 1 - 7

## 9. Internal Reporting

All suspected or alleged instances of SEAH by Edge Effect office-bearers, staff, consultants, volunteers or partners, or within any project connected with Edge Effect, must be reported to one of the Directors at the earliest possible opportunity. Delaying reporting may result in children being exposed to further exploitation or abuse. Even if you are unsure, report. Confidential reports may be

made using the form available on the about section of the Edge Effect website; reports through this form will be sent directly to the Directors.

For instances where reporting to a Director is inappropriate, the report should be made directly to the Australian Government Department of Foreign Affairs and Trade at [seah.reports@dfat.gov.au](mailto:seah.reports@dfat.gov.au) using the [SEAH Incident Notification Form](#) and/or similar procedures of other donor or contracting organisations.

## 10. External Reporting

Suspected or alleged instances of SEAH, or other significant breaches of this policy will also be reported to the Australian Government Department of Foreign Affairs and Trade, to SEAH units of any other relevant donor, and to relevant upstream organisations to which Edge Effect has reporting responsibilities. Following consultation with those entities, instances that may constitute criminal activity will be referred to police in Australia and/or the relevant country. If there is reason to believe that referral will put the victim / survivor at further risk of harm, Edge Effect will seek advice from the Australian Government Department of Foreign Affairs and Trade and SEAH experts on appropriate steps.

## 11. Investigation of Policy Breach and Disciplinary Action

The Executive Director will investigate all reported breaches, except where the report involves the Executive Director in which case an external investigator will be appointed. Disciplinary action will be taken against any office-bearer, staff, consultant, or volunteer found to be in breach of this policy, including potential dismissal or termination of contract. A register of all reports, investigations and actions will be maintained.

## 12. Other Relevant Policy

Office-bearers, staff, consultants, and volunteers must also follow the provisions of the Australian Government Department of Foreign Affairs and Trade [PSEAH Policy](#) and the Australian Government Department of Foreign Affairs and Trade [Environmental and Social Safeguard Policy for the Aid Program](#), especially the second key safeguard on Children, vulnerable and disadvantage groups. Where Edge Effect is implementing projects funded by other donors, their PSEAH policies should also be followed, along with all relevant local laws and regulations.

## 13. Relevant Links

[DFAT's SEAH Incident Notification Form](#)

[DFAT's Guidance on assessing the risk of SEAH form](#)

## 14. Approval and Review



## Prevention of Sexual Exploitation, Abuse and Harassment Policy

This policy is approved by Lana Woolf, Director.

This policy will be reviewed by 30 September 2022.

I have read, understand and agree to abide by this Edge Effect Prevention of Sexual Exploitation, Abuse and Harassment Policy.

Signature: ..... Date: .....

Please Print Name: .....