



Islamic Relief
Australia

ISLAMIC RELIEF AUSTRALIA

PSEAH Policy v1.1

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V1.0	21.12.2021	First Version Published
V1.1	22.04.2022	Incorporated changes recommended by Neelum Fida at IRW. Added Policy in Action which was missing but was in the original document. Changed to latest IRAus template, change the word “beneficiary/ies” to “right-holder/s.

Protection from Sexual Exploitation Abuse and Harassment (PSEAH) (Governance and Executive)

DEFINITIONS

Right-holder	Someone in receipt of assistance. Alternatively referred to as a member of the affected population, person we seek to assist, person affected by crisis or rights holders.
Child	In accordance with the UN Convention on the Rights of the Child definition of a child, a child is any person under the age of 18
Child Safeguarding:	The <i>duty of care</i> and responsibility of private and public organisations to adopt preventative and responsive systems, policies and practices that safeguard children from all forms of abuse and harm as a result of contact, direct or indirect, with that organisation.
Code of Conduct:.	Code of conduct/behaviour is an agreement on rules of behaviour for a group or organisation. Islamic Relief Australia has its own internal Code of Conduct that applies to all staff members and failure to adhere to the Code of Conduct can result in disciplinary measures
Focal point	A designated person locally (at country office level) and globally (at Islamic Relief Worldwide's International office in Birmingham, UK) who is responsible for supporting management in implementing the Safeguarding Policy, as well as receiving and managing safeguarding concerns and complaint
Gender-Based Violence	An umbrella term for violence directed toward or disproportionately affecting someone because of their actual or perceived gender identity. The term 'gender-based violence' is primarily used to underscore the fact that structural, gender-based power differentials around the world place women and girls at increased risk of multiple forms of violence. This includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty, whether occurring in public or in private life. While women and girls suffer disproportionately from GBV, men and boys can also be targeted
People at risk	A person at risk is someone who has needs for care and support; who is experiencing or at risk of abuse or neglect and as a result of care needs, and therefore unable to protect themselves.
(PSEA) Protection from Sexual Abuse and Exploitation	A term used by the UN and NGO community to refer to measures taken to protect children, young people and vulnerable people from sexual exploitation and abuse by their own staff, representatives and associated personnel.
Safeguarding	Actions, policies and procedures that create and maintain protective environments to protect people from exploitation, harm and abuse of all kinds, especially vulnerable adults and children. It also refers to appropriate response when harm does occur. Safeguarding applies consistently and without exception across our programs, partners and staff.

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 violence including but not limited to: rape and 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 (including involvement in or exposure to pornography and sexual slavery, voyeurism, exhibitionism and using sexually explicit language) with a child (anyone under the age of 18) 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: by using one's position of authority, influence or control to pressure, force or manipulate someone to do something against their will knowingly or unknowingly; or by threatening them with negative repercussions such as withholding project assistance, not approving an employee's work support requests, threatening to make false claims about an employee in public etc.
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, being aware of all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.
Survivor	A person who is, or has been, exploited, sexually or otherwise, harmed, victimised, harassed or abused in any way. The term 'survivor' implies strength, resilience and the capacity to survive.
Survivor-centric approach	A survivor-centric approach to protection from, and response to, any form of abuse focuses on the impact to the survivor, rather than the intent of the perpetrator. This approach ensures the survivor is: <ul style="list-style-type: none"> • Treated with dignity and respect; • Involved in the decision making; • Provided with comprehensive information, including time-frames; • Provided with mediation or alternative dispute resolution; • Protected for privacy and confidentiality where information will only be shared on a 'need-to-know' basis, and protected from retaliation; • Not discriminated against on the basis of their gender, age, race/ethnicity, ability, sexual orientation or other characteristics; • Able to access counselling, health and legal services, and psychosocial, reintegration and security support to assist with their recovery; and • Not to re-traumatise those involved in the process of reporting or investigation.
IRAUS implementing partners and contractors	Any individual or entity under contract with or funded/supported by IRAUS for the purpose to conduct programs on behalf of, or endorsed by, IRAUS.
IRAUS staff and associates	Anyone working for IRAUS, full time or part time, temporary or long-term, including consultants, interns, volunteers, secondees, Board members and any other person associated or working under contract with IRAUS in any capacity.
Violence	The intentional use of physical force or power, threatened or actual, by an individual or group, that either results in, or has a high likelihood of resulting in, actual or potential harm to another individual's health, survival, development or dignity. Violence can be committed by individuals or by the State as well as group and organisations through their

	members and policies. It results not only in fear of/or actual injury but also in fundamental interference with personal freedom and an individual's physical and emotional development.
Visitors:	Any individual visiting, for any purpose, IRAUS or IRAUS-supported programs and activities conducted by partners (including outside Australia), such as donors, supporters, ambassadors, journalists or similar.
Complainant:	An individual making a complaint. This could include a survivor of sexual exploitation, abuse and harm or someone becoming aware of wrongdoing.
Young people:	A young person is defined as an individual between the ages of 15 and 24 years

INTRODUCTION

Islamic Relief Australia (IRAUS) is a faith-inspired organisation committed to professionalism and the highest standards of excellence in the protection, health and wellbeing of our right holders. IRAUS believes everyone has the right to be safe, respected and valued regardless of who they are or their circumstances.

Islamic Relief Australia has zero tolerance of sexual exploitation, abuse and harassment.

This Policy aims to safeguard all people who come into contact with Islamic Relief Australia through our work in humanitarian and development contexts by establishing and maintaining an environment which prioritises PSEA in all that we do – across our organisation, in our work with partners and in our programs. We acknowledge that we hold a privileged position when working with the world's most vulnerable and marginalized communities and that this privilege often places us in a position of power. It is unfortunate that a minority of people use this imbalance in power to exploit and abuse vulnerable communities and colleagues; abuse of this power will not be tolerated and IRAUS is committed to preventing and addressing any such abuse in whatever form of sexual exploitation, abuse and harassment. IRAUS works in a proactive manner to address inequity in power and prioritises the safety and wellbeing of right-holders. We take protection of vulnerable and marginalised people very seriously and conduct thorough investigations of all complaints and concerns raised, and where necessary, take disciplinary action in instances of proven contravention of these mandated expectations.

All those representing Islamic Relief Australia locally, nationally and globally are required to understand, implement and adhere to the guidance outlined in this document.

POLICY STATEMENT

IRAUS believes everyone has the right to be safe, respected and valued regardless of who they are or their circumstances.

IRAUS is committed to the protection from SEAH (PSEAH) by generating an organisational and partnership culture that does not tolerate any form of SEAH committed against any external or internal stakeholder by any of its staff or associates; staff or associates of implementing partners or contractors working on IRAUS-supported/funded programs in vulnerable/marginalised communities, populations or individuals; or visitors to IRAUS or IRAUS-supported/funded programs.

This policy is a zero-tolerance policy to any form of sexual exploitation and abuse. Anyone found to have engaged in this abuse will be dismissed and will not be hired or employed again by IRAUS.

When PSEAH involves the perpetration of a crime(s), when it is safe to do so and will not cause further harm to the victim(s) the police in the country where the crime was committed will be informed, should the survivor(s) choose to prosecute.

IRAUS adopts rigorous systems and processes to prevent, identify and respond to SEAH in its work and operations, and requires all its implementing partners and contractors working on IRAUS supported/funded programs in vulnerable/marginalised communities, populations, or individuals, to have solid PSEAH systems as a condition for partnership.

It is incumbent upon all IRAUS staff to immediately report any concerns or suspicion of sexual exploitation, abuse and harassment. Anyone found to breach any policy within the safeguarding framework could be subject to disciplinary procedures and potential legal action

Our PSEAH approach is informed by Australian and State legislation and standards including guidance from ACFID and DFAT, as well as international conventions, standards and policies relating to PSEA (Interagency Standing Committee (IASC) Guidelines (2021) and Global Standard Operating Procedures (2016) on the Prevention of Sexual Exploitation and Abuse (PSEA)) and Islamic Relief Worldwide (IRW) standards and procedures.

SCOPE

This Policy applies to the following people:

1. IRAUS Board of Directors;
2. IRAUS staff members, contractors, and consultants;
3. IRAUS office-based volunteers, interns and grassroots network activists; and
4. Partner organisations.

This Policy should be read and enforced together with IRAUS Child Protection Policy and HR Code of Conduct.

EXCLUSIONS

None

OBJECTIVES

The key objectives of this policy are:

- i. **Non-discrimination:** To ensure protection from PSEAH of all internal and external stakeholders, including IRAUS staff and associates, IRAUS implementing partners or contractors, visitors, any child or adult right-holders, and young people involved in IRAUS's work – regardless of their age, nationality, race, sex, gender, sexuality, sexual orientation, culture, ethnicity, indigeneity, language, religious or political belief, socio-economic status,

- family or criminal background, disability, physical or mental health, displacement, or any other status.
- ii. **Acknowledgement of SEAH risks:** To acknowledge that PSEAH might occur within IRAUS' programs and operations, recognising that it is often a hidden and under-reported phenomenon due to power dynamics, fear, stigma, discrimination, cultural norms or other sensitivities. Acknowledging this risk is the first crucial step to take action and prevent any and all these forms of abuse.
 - iii. **Accountability and transparency:** To ensure IRAUS has systems in place to document, monitor and report on the implementation of this Policy, as well as mechanisms to ensure that management and staff are committed to PSEAH, and are undertaking their PSEAH roles and responsibilities to the best of their capacity.
 - iv. **Shared responsibility:** To make PSEAH be a shared responsibility, expecting all IRAUS staff, associates, implementing partners, contractors, and visitors to be committed to, and to uphold, the principles of this Policy.
 - v. **Commitment to action/response:** To ensure IRAUS commits to acting on all reports of SEAH and breaches of this Policy, through timely, confidential, safe and effective processes and investigation approaches, as well as providing assistance and support to survivors.
 - vi. **Survivor-centric approach:** To ensure IRAUS takes a 'do no harm' approach, prioritising the rights, needs and wishes of the survivor, whilst providing procedural fairness to all parties. IRAUS' approach to SEAH prevention and response will focus on the impact to the survivor.
 - vii. **Protection of survivors, witnesses, reporters and alleged/actual perpetrators:** To ensure that all those involved in an alleged or actual incident or case (survivor, witness, reporter, alleged/actual perpetrator) remain safe and have their right to confidentiality upheld (unless IRAUS is required to share details to law enforcement during criminal proceedings or investigations).

IRAUS implements the objectives of this policy by keeping informed on changing international landscapes particularly those where programs are based and simultaneously providing ongoing mandatory subject matter training and awareness for all staff in the organisation.

POLICY IN ACTION

1. Protecting Sexual exploitation, abuse and harassment in Programs

In order to manage risk related to PSEAH in programs, the IRAUS Programs team will:

- a) Ensure the active participation of the people we work with in assessing, planning, implementing, monitoring and evaluating programs through the systematic use of participatory methods;
- b) Obtain a PSHEA risk assessment from IRW or partner offices for all new projects and for all projects that undergo substantial change. Such information should be obtained on an annual basis for long-term projects;
- c) Review and support partners in mitigating any identified PSHEA risk;
- d) Maintain PSHEA monitoring in the IRAUS Risk Register for the CEO to submit as an item on the Risk Report sent to the Board of Trustees (BOT) quarterly;
- e) Review and report annually to the Compliance Committee on the effectiveness of IRAUS' program risk assessment tools and processes, and changing or updating them as needed; and
- f) Maintain specific PSEAH procedures which apply to all visits by external parties that it organises/arranges to IRAUS funded programs in collaboration with the Supporter Relations team.

2. Protecting sexual exploitation, abuse and harassment in communications

In order to manage risk related to sexual exploitation, abuse and harassment in communications and messaging, the Communications team will:

- a) Ensure no inappropriate content is used internally or externally for communications.
- b) Ensure the consent form/audio file is always attached with the picture within the IRAUS 'Photo Library', or else not use the image in any internal or external communications.
- c) Ensure that a child, young person or people at risk cannot reasonably be identified or specifically located by a picture or case study.
- d) Ensure no photo or case study is used of a child, young person or people at risk which may infringe upon their dignity or rights.

3. Protecting Sexual exploitation, abuse and harassment in Human Resources

In order to manage risk related to PSEAH amongst personnel and within the organisation, the Human Resources team will:

- a) Maintain a zero tolerance approach towards all forms of violence, sexual exploitation and abuse towards a children, young people or people at risk
- b) Not knowingly appoint any person with a history of perpetrating any form of PSEAH and will carry out DBS/police checks in line with country requirements
- c) Ensure PSEAH is incorporated as part of screening and vetting processes
- d) Ensure all new staff are inducted into the Protection of Sexual Exploitation and Abuse Policy and sign the PSEAH Code of Conduct (Annex 2).
- e) Ensure all staff are subject to valid police checks and (in states where relevant) specific child protection checks.
- f) Ensure all staff annually undergo PSEAH refresher training, or undergo additional training upon any substantial change to the IRAUS Safeguarding Policy or Procedures.

- g) Ensure all volunteers are inducted into the PSEAH Policy and have signed the PSEAH Code of Conduct, and have undertaken a police check and (in states where relevant) specific child protection checks.
- h) Ensure all BOT members, ambassadors and any individual who visits IRAUS projects overseas are inducted into the PSEAH Policy and have signed the PSEAH Code of Conduct, and undertake a police check and (in states where relevant) specific child protection checks.
- i) Ensure any person contracted to provide consultancy or other services are aware of the Policy and sign the PSEAH Code of Conduct.

4. Responsible staff members and reporting

- a) **All IRAUS staff and associates, IRAUS implementing partners and contractors, and visitors** are responsible for championing good practice and an organisational culture that prioritises safeguarding and fosters gender equality, respect and healthy power balances. All IRAUS staff and associates are also required to immediately internally report any witnessed, suspected or alleged cases of SEAH, or breaches of this Policy, IRAUS's Child Safeguarding & PSEAH Code of Conduct, and/or IRAUS's Child Safeguarding & PSEAH Implementation Procedures, in line with IRAUS's Child Safeguarding & PSEAH Incident Reporting Guidelines.
- b) **The Director of Programs** is responsible for communicating this Policy with national implementing partners and contractors, ensuring they have PSEAH systems in line with IRAUS and national standards to ensure PSEAH is taken into consideration in the implementing partner's program supported/funded by IRAUS, if it involves direct or indirect contact with communities and/or vulnerable/marginalised populations or individuals.
- c) **The Director of Corporate services** is responsible for ensuring robust recruitment, induction and training processes are in place to prevent PSEAH and strengthen knowledge and understanding of PSEAH among IRAUS staff and associates.
- d) **Child Safeguarding & PSEAH focal points** are easily identifiable first points of contact for all concerns or allegations regarding a possible breach of the Policy or Code of Conduct. The focal point will assist the Corporate Services Department in inducting new staff into the policy or conducting refresher training. The focal point will also be responsible for monitoring all sources of PSEAH principles mentioned in this Policy – and any new sources as they should arise – to ensure the Policy remains relevant and up to date.
- e) **The Compliance Committee** serves as the overall guarantor of the Child Safeguarding and PSEAH Policies and convene on a quarterly basis, or on an urgent basis in the event of a child safeguarding or PSEAH incident or breach of the Child Safeguarding or PSEAH Policies. This Committee is responsible for ensuring compliance with IRAUS's external PSEAH obligations, including legislative and related to ACFID and DFAT obligations, and partnership requirements.
- f) **The CEO** is accountable for setting the tone from the top and creating an organisational culture that prioritises PSEAH. The CEO is also responsible for ensuring this Policy is reviewed and updated every three years (or at any other time, if required), in line with legislative and organisational developments. The CEO is also required to ensure relevant PSEAH incidents are reported in a timely manner to in line with IRAUS' obligations, respecting the principles of confidentiality, accountability, transparency, and the best interest of the survivor.

5. Incident reporting

IRAUS has an accessible, safe, confidential and robust internal mechanism to report PSEAH incidents or breaches of this Policy (detailed in the PSEAH Procedure manual). Internal reporting is mandatory for all staff, associates, implementing partners and contractors and IRAUS complies with relevant reporting obligations to law enforcement agencies, DFAT and ACFID, as appropriate. IRAUS commits to creating an organisational culture at all levels that encourages complaints and deals with them swiftly and in line with this policy.

6. Acting on incidents/breaches

IRAUS adopts a robust system to act on reports of PSEAH incidents and breaches by staff, associates, implementing partners and contractors, which always ensures the best interest of the survivor, and guarantees the confidentiality and safety of all those involved (survivor, witness, alleged or actual perpetrator, and reporter). The response system includes appropriate disciplinary action proportionate to the severity of the incident or breach (which is further defined in the *PSEAH Procedures Manual*).

POLICY ANNEXES

Annex 1 - Prevention of sexual exploitation, abuse and harassment procedure

Preventing Sexual Exploitation, Abuse and Harassment Procedures

PROCEDURE STATEMENT

PURPOSE

This procedure exists to reaffirm the commitment of Islamic Relief Australia (IRAUS) to create a safe working culture for all those whom we serve and those working for and representing the organisation and ensure that all concerns or allegations of sexual harassment, abuse or exploitation are responded to in a timely and appropriate manner and there are multiple channels through which staff and other stakeholders can raise concerns.

It outlines how the Prevention of Sexual Exploitation, Abuse and Harassment Policy will be implemented in IRAUS and provides clear and practical steps and guidance to staff who through the course of their work experience have contact with children, young people and people at risk or suspect a violation of the Policy.

It also sets out:

- IRAUS's approach to preventing sexual exploitation and abuse
- The principles upon which we will base our decision making and actions,
- Our commitments to ensure effective action is taken when problems occur.

The IRAUS PSEAH Policy and Procedures will be reviewed every three years at a minimum.

SCOPE

All Islamic Relief Australia offices.

To the extent specified within this Procedure, Islamic Relief Worldwide, all Islamic Relief partners, and all external partners. The particular obligations of those mentioned may vary as per the legal contexts of different countries. Islamic Relief Australia acknowledges that application of the Procedures may be impacted by the domestic legal context of the specific country in question.

In general, all Islamic Relief Australia employees, consultants, volunteers, and supporters are responsible for ensuring the protection of children, young people, and people at risk.

PROCEDURES, STEPS AND ACTIONS

1. Preventing sexual exploitation, abuse and harassment (PSEAH) in programs and partnerships

Responsibility for this section of the Policy lies with the Programs Director.

1.a. Working with implementing partners and contractors

IRAUS will ensure implementing partners and contractors to have PSEAH systems of comparable standards to IRAUS or alternatively work with IRAUS on a mutually agreed and time bound action plans to ensure PSEAH is taken into consideration in their program supported/funded by IRAUS, if it involves direct or indirect contact with communities and/or vulnerable populations or individuals.

In all cases, this involves PSEAH risk assessment of partner organisations and, when relevant, may include signing and abiding by IRAUS's PSEAH Code of Conduct and/or PSEAH procedures or standards). This needs to be enforced by including it in partnership contracts and by ensuring an implementing partner's compliance is regularly assessed.

Steps are required to be taken to ensure partners and contractors are aware of the responsibility to maintain an environment that is free of sexual exploitation and abuse and to report any abuse they suspect or witness, whether within IRAUS offices or outside, in line with the reporting protocols outlined in this Policy.

IRAUS is required to communicate complaints reporting mechanisms to the people it works with and engages, and actively involving them in the design of these mechanisms. The organisation needs to ensure that all responses are developed in a manner that balances respect for due process with prioritising the safety, dignity and rights of survivors. All systems, processes and procedures must ensure that assistance for those affected by violations is provided in a non-discriminating manner and in ways that prevent additional harm. If needed, IRAUS should translate PSEAH policy into the local language with information accessible to communities with consideration of varying abilities.

1.b. Risk assessment and management

IRAUS needs to ensure that it integrates PSEAH (and child safeguarding) into organisational, programmatic and activity-based risk assessment processes (including a gender analysis of the setting/context where a program will be implemented) and make sure that appropriate mitigation strategies are in place for any identified PSEAH-related risks.

IRAUS also requires implementing partners and contractors to conduct a PSEAH (and child safeguarding) risk management exercise of all IRAUS-supported/funded programs which involve direct or indirect contact with communities and/or with vulnerable/marginalised populations or individuals.

1.c. Humanitarian situations and disasters

IRAUS acknowledges that women and children are particularly vulnerable to abuse or harm in a disaster context, and that particular measures must be undertaken to reduce these specific risks in our humanitarian projects or programs. IRAUS will:

- i. Ensure any implementing partner in a humanitarian situation meets internationally recognised minimum standards (such as The Minimum Standards for Child Protection in Humanitarian Action, or The Code of Conduct of The International Committee of the Red Cross and Red Crescent Movement and NGOs in Disaster Relief) ii. Integrate and mainstream PSEAH into all development and humanitarian work,
- iii. Promote standalone protection programming in humanitarian settings with clear complaints and reporting mechanisms;
- iv. Ensure that partners, communities and people we work with are proactively informed about IRAUS' commitments to PSEAH and reporting procedures in place for raising any concerns relating to PSEAH.
- v. Assist partners with developing PSEAH clauses within their emergency response policies and procedures.

2. Fundraising and supporter relations

Responsibility for this section of the Policy lies with the Fundraising Director, or highest level line staff member in the Fundraising and Supporter Relations Department.

2.a. Fundraising

2.a.1. Young Volunteers

IRAUS welcomes young volunteers (a volunteer under the age of 18) however recognises such volunteers as children, and takes a risk management approach to ensuring a young volunteer feels safe and is protected while volunteering at IRAUS.

A staff member who is not classified as 'working with children' should not be alone with young fundraisers unless safety requires it. Provisions should be made ahead of time to ensure this situation does not arise.

Young volunteers should only take on roles which are age appropriate. Fundraisers should discuss with their line manager whether a particular task or role is age appropriate, and complete a risk assessment form for any role typically undertaken by a young volunteer.

2.a.2. Events

Children and vulnerable groups are usually present at IRAUS fundraising events (for example activities in schools, shelters for survivors of abuse, mental health institutions, marginalised communities, but also campaigns or events involving children or vulnerable groups). The following procedures must be undertaken prior to the planned event to mitigate any protection risks:

The event coordinator must complete a PSEAH risk assessment with the event proposal and discuss with their line manager how best to mitigate risks.

If there are young volunteers involved in the event, their roles must be assessed for age appropriateness and measures must be instated to ensure any risks to them are managed.

Staff and volunteers will be briefed by the PSEAH focal point to ensure PSEAH systems are in place and in particular, remind staff of the Code of Conduct and its provisions, the incident reporting procedures, and guidelines for taking and using images.

Volunteers will be vetted, briefed and requested to obtain a police background check.

If the event has an anticipated guest list of greater than 100 people, a staff member attending the event must be the designated Event Child Protection and PSEAH Officer who will be in charge of observing other staff and volunteers at the event to ensure they comply with the Code of Conduct.

2.b. Supporter Relations

2.b.1. Supporters visiting the field

Donors or volunteers may visit projects funded through IRAUS (including of implementing partners or contractors and IRW country offices) and in doing so, come into contact with children, young people and people at risk. IRAUS will manage the PSEAH risks of these visits by:

- i. Ensuring anyone visiting projects funded by IRAUS has undergone a criminal history check before their visit is approved.
- ii. Ensuring anyone visiting projects funded by IRAUS undergoes pre-departure training and PSEAH briefing to comply with all obligations proscribed in that training during visits and has signed the Code of Conduct.
- iii. Ensuring any donors or volunteers are accompanied at all times by an IRAUS staff member and never left unsupervised with a child.

- iv. Ensuring that, in the case of a visit to the home of a community member, the CEO has approved such a visit and the visit has been agreed to by the parents and community leaders, and guidelines regarding interactions with children are strictly followed.
- v. Conducting a PSEAH risk assessment of the visit, with relevant additional risk mitigation strategies, as required.

3. Human resources

Responsibility for this section of the Policy lies with the Corporate Services Director, or highest level line staff member in the Human Resources Department.

IRAUS will ensure that HR processes support the prevention of sexual exploitation and abuse in all development and humanitarian settings through the following steps:

- i. IRAUS incorporates PSEAH principles and practice into all recruitment and screening of staff and volunteers, including, but not limited to, background and referee checks, working with children checks, tailored safeguarding interview questions and reiteration of IRAUS' PSEAH commitment in job advertisements and throughout the recruitment/screening process
- ii. IRAUS translates the PSEAH policy commitments and actions into employee job descriptions; assigning specific responsibilities for PSEAH implementation.
- iii. IRAUS will ensure that hiring practices prohibit and prevent sexual exploitation and abuse from occurring during hiring. All personnel involved in recruitment and hiring should be held accountable for their behaviour and practices, and staff will not abuse their position of power in the hiring process in accordance with the Code of Conduct.
- iv. IRAUS will integrate PSEAH policy into staff and volunteer induction materials and on-board training and will require the signing of PSEAH Code of Conduct. In doing so, line managers must ensure that staff understand Islamic Relief Australia's PSEAH expectations through an ongoing engagement with their teams.
- v. IRAUS will conduct an annual session with staff, volunteers and downstream partners to continue to build awareness of the PSEAH Policy and complaints mechanism. Staff members will be provided with the updated IRAUS PSEAH Policy and will be required to sign the updated Code of Conduct upon any update.
- vi. IRAUS and its partners will keep a training log to track attendance. Each partner office will appoint an appropriate safeguarding lead to roll out the policy, inductions and training.
- vii. IRAUS will assign a staff person to be the PSEAH Focal Person (FP), which will be reflected in their job description. The PSEAH FP will be required to ensure best practice in safeguarding and PSEAH.
- viii. IRAUS will bring this Policy to the attention of, and require the signing of the PSEAH Code of Conduct by, people contracted by IRAUS as consultants or to provide specific services by including those documents in the contract terms and conditions.

4. Reporting procedures

4.a. Obligation to report

IRAUS will ensure that the safety, dignity and rights of the survivor are respected at all times including during reporting, investigation and in the provision of assistance.

IRAUS will work with partners to ensure all development and humanitarian programs include community-based complaints mechanisms and reporting processes that are designed in collaboration with communities, and transparent and accessible to the communities being supported. IRAUS will also work with partners to establish adequate referral pathways to support survivors, particularly in humanitarian settings.

All staff, volunteers, interns, board members, partners and consultants have a responsibility to raise concerns directly to the PSEAH Focal Point in the case that:

- i. They suspect children, young people and people at risk is being harmed or could be harmed.
- ii. A disclosure or allegation from a child/ family member/ community member/ staff member/ volunteer/other stakeholder is made regarding the safety or abuse of children, young person or people at risk who are involved in an IRAUS project, program, or involved with IRAUS in any other way.
- iii. They observe concerning behaviour or actions of an IRAUS stakeholder, whether staff member, volunteer, contractor, board member or other, which they feel does or may breach the Child Protection Policy and Code of Conduct.
- iv. They are aware of, or suspect inappropriate use of, printed or online materials.

In no situation will an IRAUS staff member be punished for reporting an incident.

If the allegation is in relation to the CEO then the matter must immediately be reported to the Chair of the Islamic Relief Australia Board.

If a staff member suspects violation of this and does not report that incident, they may be subject to disciplinary measures including possible termination of employment.

The complainant will be provided with reassurance that there is no danger of retaliation and that the matter will be treated with strict confidentiality.

4.b. Making a report

The staff member must report any suspicion or knowledge of sexual exploitation and abuse to the PSEAH Focal Point (FP) as immediately as possible. The PSEAH FP will acknowledge the allegation within 24 hours and immediately notify the CEO and complete a 'PSEAH Incident Report' (Annex I) with the reporter and submit it to the CEO following completion. The CEO must immediately notify the IRAUS BOT of the incident reported.

PSEAH complaints will be treated in a safe, transparent and confidential way. IRAUS will ensure the safety and wellbeing of the survivor/complainant.

Decisions will be made in the best interests of the survivor, consulting them in decisions affecting their lives and collaborating with actors trained to handle the special needs of survivors of sexual abuse. If the complaint involves harm to children, this will be dealt with under the Child Protection Policy.

The CEO may decide to launch an investigation. Only trained staff will be allowed investigate allegations of sexual exploitation and abuse (SEAH). Otherwise external PSEAH investigators will have to be appointed. The IRAUS BOT must be notified of the decision to launch an investigation within 24 hours. They must be notified of the outcome of the investigation within 72 hours of that outcome being formalised.

Legal advice is required to be sought if needed.

IRAUS recognises sexual exploitation and abuse as gross misconduct and therefore perpetrators will face disciplinary action, including immediate termination of employment and referral for criminal prosecution, where appropriate and in accordance with established procedures.

In case of SEAH issues with partner organization, following the investigation, IRAUS must discuss the recommended actions with the partner. If the partner disagrees with the IRAUS recommendations,

and IRAUS considers the recommended actions of the partner to be inadequate, IRAUS reserves the right to immediately cease all funding to that partner until adequate measures are taken.

4.b.1. SEAH incidents in Australia

If the allegations involve IRAUS staff, consultants, volunteers, supporters or partners, the CEO will agree on a process and who needs to be informed to protect the individual from any further or new risk in cooperation with the Director of Programs and Corporate Services Director, ensuring strict confidentiality. The CEO may request an internal inquiry/investigation (with the consent of the survivor) by appointing a trained investigator. If the matter needs to be reported to any external regulatory or law enforcement body then the incident will be reported to them via the CEO

4.b.2. SEAH incidents involving IRW Field Offices or IRW Partners

If the incident has occurred outside of Australia and concerns an IRW field office or partner using IRAUS funding or implementing an IRAUS project or program, the IRAUS CEO will immediately notify IRW through the general safeguarding email: Safeguarding@irworldwide.org. IRW will then engage the Global Safeguarding Lead within 24 hours at most.

If IRAUS considers the action of IRW to be inadequate, IRAUS reserves the right to immediately cease all funding to that partner or field office until adequate measures are taken to protect children from harm. This decision must be made by the IRAUS CEO.

4.b.3. SEAH incidents involving partners external to IRW outside Australia

If the incident concerns a partner external to IRW and the CEO decides to carry out an investigation, the appointed IRAUS investigation officer will be asked to undertake the investigation and report the findings to the CEO.

The IRAUS CEO will inform the local authorities and further actions by IRAUS will be guided by the local law enforcement agencies.

4.b.4. Substantiated cases of SEAH

In the case of substantiated sexual exploitation and abuse, the actions will differ depending on the nature of the perpetrator's association with IRAUS:

- i. If the perpetrator is a staff member, they will be summarily dismissed.
- ii. If the perpetrator is a volunteer, their relationship with IRAUS will be terminated indefinitely.
- iii. If the perpetrator is a Board Member, they will be removed from the Board of Trustees immediately.
- iv. If the perpetrator is a contractor or consultant, their contract will be terminated immediately.
- v. If the perpetrator is associated with IRAUS or IRAUS programs in any other capacity, the association will be terminated.

4.b.5. Where allegations remain unsubstantiated

In the case of unsubstantiated allegations, IRAUS will consider whether the capacity existed to conduct fair and thorough investigations into the allegations. IRAUS reserves the right to take further action if necessary to ensure the safety of children, young people and people at risk, such as ensuring the relevant individual, in the course of their work with IRAUS or in IRAUS programs, has no

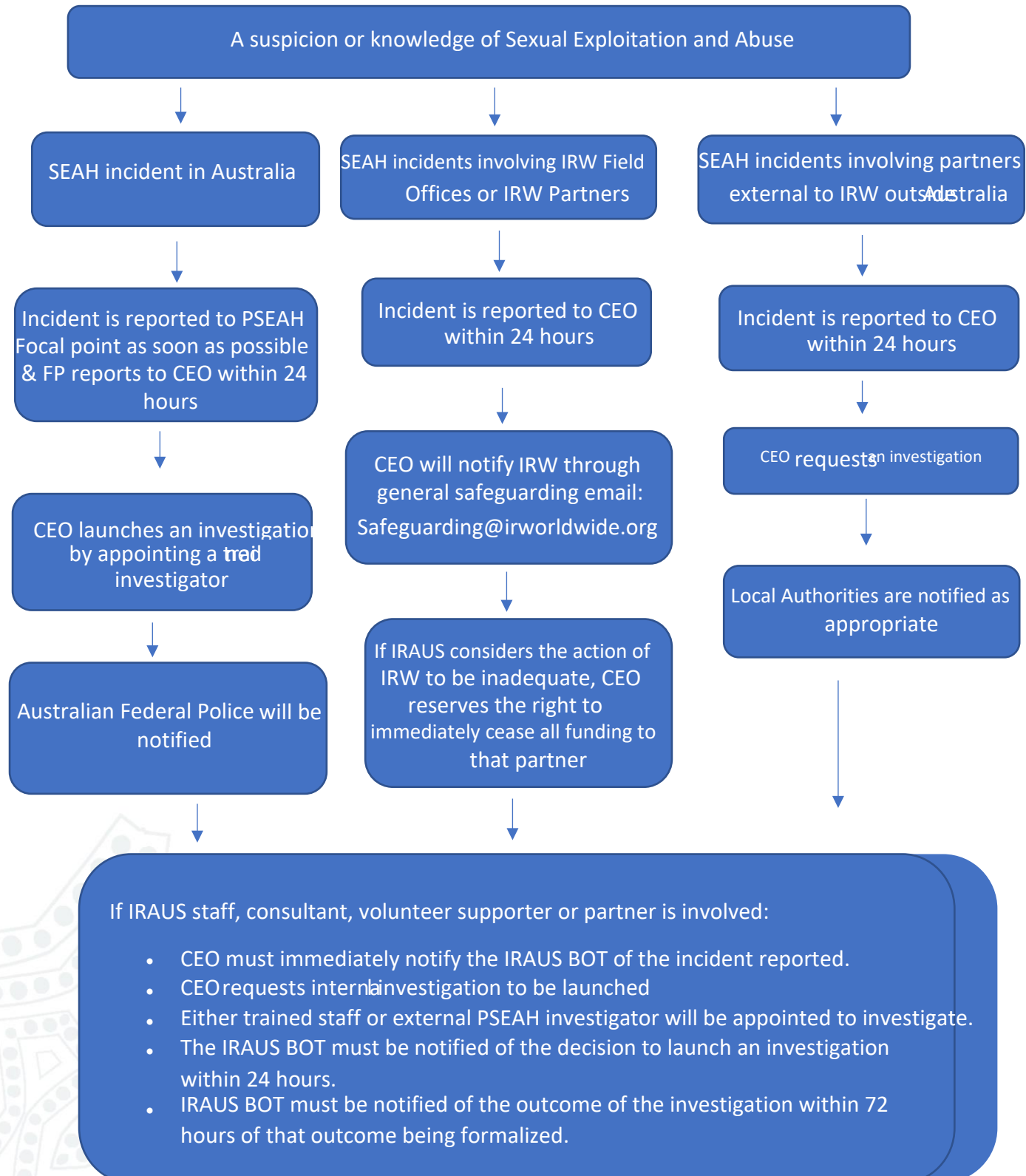


unsupervised contact with vulnerable people e.g. by moving the alleged perpetrator in question to a different role so they have limited contact with the complainant.

4.c. Criminal prosecution

In cases of substantiated allegations, the individual may be subject to criminal prosecution under Australian law or the law of other countries. IRAUS will cooperate fully with any case of criminal prosecution.

PROCEDURE FLOWCHART



PROCEDURE ANNEXES

Include documents which support or are specifically referred to within the procedure.

1. ANNEX 1- IRAUS PSEAH Code of Conduct

Islamic Relief Australia has a zero tolerance towards all forms of violence, sexual exploitation, abuse and exploitation. Representatives of Islamic Relief Australia working directly or indirectly with children, young people and people at risk must follow Islamic Relief Australia's Code of Conduct. These codes also apply to staff and their conduct towards each other and those we serve.

Being an Islamic Relief Australia representative, I **must**:

- Treat all stakeholders I interact with (including children, vulnerable populations, young people) with respect regardless of their race, indigeneity, colour, caste, gender, sexual orientation, age, language, religion, opinions, nationality, ethnicity, social origin, displacement, property, disability or other status.
- Not use language or behaviour towards any stakeholders I interact with (including children, women, vulnerable populations, and young people) that is inappropriate, harassing, abusive, sexually provocative, humiliating, demeaning or culturally insensitive.
- Not engage in or facilitate any form of sexual activity, including paying for sexual services or acts, with children or right-holders, regardless if they provide consent.
- Not physically punish or intentionally harm a child in any manner.
- Not use any form of drugs, alcohol or illegal substances when in the workplace or in any work-related context; or offer, procure, provide or encourage a child to use or consume any of these substances and/or alcohol in any circumstance.
- Keep confidential all information that I am party to regarding child safeguarding or sexual abuse cases, only disclosing or discussing information with those responsible for investigating incidents or other parties as designated by them and according to the Incident Reporting Procedures.
- Disclose any child abuse or sexual abuse related convictions, investigations, allegations, work-related warnings or other disciplinary actions that I am or have been subject to outside my role as a IRAUS staff or associate; staff and associate of a partner or contractor; or visitor to IRAUS or IRAUS-supported programs.
- Not visit at home alone any child or adult right-holder, or any young person involved in IRAUS or IRAUS-supported work; or invite them unaccompanied into my home or accommodation, unless they are at immediate risk of injury or harm (including when visiting IRAUS programs outside of Australia).
- Ensure, whenever possible, that another adult is present when working in proximity of, or engaging with a child or adult right-holder, or a young person involved in IRAUS or IRAUS supported work (including when visiting IRAUS programs outside Australia).
- Not use mobile/communication devices, social media or other means to contact or communicate with a child or adult right-holder, or a young person involved in IRAUS or IRAUS supported work for purposes beyond my work duties; and when contacting/communicating with any of them as part of my work duties, I will endeavour not to do so on a one-on-one or private basis. If a child or adult right-holder, or a young person initiates contact or seeks to have interaction beyond

work-related matters with a IRAUS staff or associate, or staff of a partner organisation, the communication will be immediately diverted to the means detailed to relevant supervisors and FP and an explanation provided to the child, adult right-holder, or young person as to why the interaction cannot continue. If my role requires regular and ongoing contact with children or young people, this interaction will be assessed and monitored by my supervisor as part of the regular performance management process.

- Not use social media to solicit or befriend a child, young person involved in IRAUS or IRAUS-supported work, and not place images of those children or young people on personal social media sites (or social media sites of my company, if I am a visitor or partner to IRAUS programs) unless informed consent is obtained (including from caregivers/guardians in the case of children).
- Not hold, kiss, cuddle, fondle or touch children, young people or any right-holders involved in IRAUS or IRAUS -supported work in an inappropriate way, and try to avoid physical interaction as much as possible (in order to avoid possible misinterpretations and misleading situations).
- Not abuse my position to withhold professional assistance or services, or give preferential treatment, gifts or payment of any kind to any child or adult right-holders, including young people involved in IRAUS or IRAUS -supported work, in order to solicit any form of advantage or sexual favour from them (including outside Australia when visiting IRAUS programs).
- Not provide gifts of any sort (including money or in-kind) to children, parents/caregivers or any other individual associated to IRAUS or IRAUS -supported work (including outside Australia when visiting IRAUS field programs), unless providing gifts or materials is part of a IRAUS or IRAUS Australia program activity.
- Ensure children, young people and adults who are involved in research or consultations with IRAUS participate in these activities voluntarily, are well informed of the process and have provided informed consent.
- Report any suspicion, allegation or witness of abuse against any child or adult right-holder, young person involved in IRAUS or IRAUS -supported work, or other breaches of the Child Protection Policy, PSEA Policy or CS/PSEAH Code of Conduct by IRAUS staff and associates; staff and associates of partners and contractors; and visitors to IRAUS or IRAUS-supported programs (including outside Australia), in line with the CS/PSEAH Incident Reporting Procedures.
- Assess and endeavour to comply with local traditions or restrictions for reproducing personal images.
- Obtain informed consent using IRAUS' Informed Consent Form (in the case of a child, from him/her and his/her guardian or caregiver) before taking the photo or film, ensuring that they understand how the images will be used and possible repercussions.
- Ensure that images and associated information are honest representations of the context and facts, and are strictly relevant to the work of IRAUS.
- Ensure photographs, films, videos and DVDs present the subject in a dignified and respectful manner and not in a vulnerable or submissive manner. They should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure file labels, meta data or text descriptions do not reveal identifying information about any individual when sending images electronically or publishing images in any form.
- Where possible, use IRAUS cameras or video recording devices (avoiding use of personal devices).



- When using images or footage provided (or made available) by IRAUS or another external party, confirm that an appropriate consent process has been followed.

I have read and understand the PSEAH Policy and Code of Conduct, and agree to abide by it at all times to protect children, young people and people at risk who are impacted by IRAUS or who I may come into contact with during the course of my work.

I understand that a breach of the Code of Conduct or the IRAUS PSEAH Policy and Procedures constitutes grounds for disciplinary action, and may lead to dismissal from employment or service, and result in legal proceedings.

Signature: _____

Name: _____

Position: _____

Date: _____

2. ANNEX 2- IRAUS SEAH Incident Report Template

Any complainant must be aware of the following information:

This report must be completed if you suspect or know about actual or potential sexual exploitation, abuse or harassment towards a child, young person or people at risk. Failure to report an incident that you know about or suspect is taken very seriously and could result in termination of your employment or association with Islamic Relief Australia.

This report will under no circumstances be made public and will be securely stored by the Corporate Services Department.

This report will be shared in full with staff relevant to the investigation including the CEO, Corporate Services Director, the PSEAH Focal Point and the IRW Safeguarding team. Information within the report may be shared elsewhere if and as appropriate, as decided by the IRAUS CEO.

The information in this report will be put to the alleged perpetrator in the course of the investigation. If you are concerned about your safety and wellbeing in this process, please share these concerns with your line manager who will discuss with you and senior management how to mitigate your concerns and ensure your safety and security.

If the reporter is filling out the report in person: Do you, the reporter, understand this information?

☐

YES Name: _____ Sign: _____ Date: _____

If this information has been conveyed over the phone by your line manager: Have you (Line Manager) conveyed this information to the reporter?

☐

YES Name: _____ Sign: _____ Date: _____

Reporter

Name of reporter: _____

Age: _____

Sex: _____ Country of Residence: _____

Relationship with child: _____

Relationship with alleged perpetrator: _____



Relationship with IRAUS: _____

Alleged perpetrator

Name of alleged perpetrator: _____

Age: _____

Sex: _____ Country of Residence:

Relationship with child: _____

Relationship with reporter: _____

Relationship with IRAUS: _____



Survivor

Name of Survivor: _____

Age: _____

Sex: _____ Country of Residence:

Relationship with reporter: _____

Relationship with alleged perpetrator: _____

Relationship with IRAUS: _____



Incident

Date/ time of incident: _____

Country of incident: _____

Location of incident: _____

Names/contact details of any witnesses:

Name: _____

Contact Details: _____

Name: _____

Contact Details: _____

Name: _____

Contact Details: _____

Short description of incident (add further paper if needed):

What immediate security measures have been taken to protect the survivor?



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Who is responsible for ensuring immediate security for the survivor?
--

--

Have the police been contacted?

--

If yes, what happened?

--

Does the survivor want police assistance?

--

Has the survivor been informed about medical treatment, if necessary?

--

Has the survivor sought medical treatment, if known?
--

--

If yes, who provided the treatment?

--

If known, any information on prognosis and treatment?

--

Any other relevant information provided by reporter:



Report completed by:	
Name: _____	_____
Position: _____	_____
Date: _____	Time: _____
_____	_____
Signature: _____	Location: _____

If the reporter is with their line manager in person: Did your line manager explain to you the reporting process from here?	
<input type="checkbox"/> YES	<input type="checkbox"/> NO Sign: _____ Date: _____
If this information has been conveyed over the phone by your line manager: Have you conveyed this information to the reporter?	
<input type="checkbox"/> YES	<input type="checkbox"/> NO Sign: _____ Date: _____
If the reporter is with their line manager in person: Do you have any concerns for your safety which you would like to discuss further with your line manager and senior management?	
<input type="checkbox"/> YES	<input type="checkbox"/> NO Sign: _____ Date: _____
If this information has been conveyed over the phone by your line manager: Have you discussed the next steps of this with the reporter, if necessary?	
<input type="checkbox"/> YES	<input type="checkbox"/> NO Sign: _____ Date: _____

Date completed report sent to CEO:

Date report received by CEO:
I, the CEO, have read this report and will be taking appropriate action:
Name: _____ Date: _____

END OF POLICY DOCUMENT