



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

1. Purpose

The purpose of this policy is to provide standards of behaviour for CFC ANCOP Australia Ltd. leaders, members, partners and volunteers when working and interacting with others. This policy focuses on the prevention of sexual exploitation, abuse and harassment and provides a mechanism for people to report and speak up where an incident is identified.

2. Scope

This policy applies to CFC ANCOP Australia Ltd. (referred to as "ANCOP" within this document) leadership and members, as well as our partners, volunteers, recipients and stakeholders.

3. Definitions

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.

Sexual harassment - unwanted physical, verbal or non-verbal conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated where that reaction is reasonable in the circumstances. Sexual harassment can take various forms and can include:

- Indecent/suggestive remarks or jokes
- sexual demands
- unwelcome touching, hugging, kissing or leering
- accessing sexually explicit internet sites or displaying visuals of a sexual nature
- unwanted invitations to go out on dates or requests for sex
- intrusive questions about a person's private life or body
- insults or taunts of a sexual nature
- sexually explicit emails or messages
- behaviour which is an offence under the criminal law – e.g. physical assault, indecent exposure, stalking or obscene communications.

Safeguarding - actions, policies and procedures that create and maintain protective environments to protect people from exploitation, harm and abuse of all kinds.

Complainant - a person who makes a complaint. Note that a complainant may not be the actual victim or survivor.

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Complaint - any grievance, suspicion, allegation, concern or report about an incident or someone's behaviour; this includes sensitive or whistleblower complaints as defined in the ANCOP Complaints Policy.

Victim/Survivor - a person who is, or has been, sexually exploited, harassed or abused.

Victimisation - includes treating a person unfavourably because of the person's involvement, in whatever capacity, in any complaint of discrimination or sexual harassment.

Vulnerable person – an adult considered to be susceptible to abuse or exploitation based on their health status (mental or physical), age, grief, social isolation, or financial hardship.

Child/ Children – person(s) under 18 years of age.

Disability - includes long-term physical, mental, intellectual or sensory impairments which, in interaction with various barriers, may hinder a person's full and effective participation in society on an equal basis with others.

Program Partners - individuals or organisations that ANCOP works with and supports to deliver humanitarian and development programs or activities. This includes any downstream partners who provide support in the delivery of these programs.

4. Roles and responsibilities

4.1 The Board is responsible for:

- Guiding governance and promote a culture of zero tolerance for abuse, neglect or exploitation and a survivor-centric approach at ANCOP.
- Approving this policy and holding the Management Committee accountable to the effective implementation of this policy.

4.2 The ANCOP Safeguarding Officer must:

- Be suitably trained and has the appropriate skills and competency for this role.
- Ensure that all internal and external stakeholders are aware of and understand relevant rules and policies as well as their obligation to report suspected incidents of abuse, neglect or exploitation.
- Be the focal point of contact for reports related to abuse, neglect or exploitation and manage these reports from initiation until their conclusion.
- Provide support for members, partners and volunteers in undertaking their responsibilities.

4.3 President, Management Committee, Program Leads and Partners are responsible for:

- Ensuring this policy is upheld.
- Informing the Board of any concerns and updates relating to this policy.
- Leading by example.
- Ensuring their teams and volunteers are aware of and understand their responsibility and accountability to this policy.
- Ensuring ANCOP practices, plans and operations/procedures align with this policy.

4.4 ANCOP members and volunteers are responsible for:

- Understanding and following this policy and related procedures.
- Reporting any breach following ANCOP's complaints process.

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5. Policy Commitments

Our commitments are based on the following CFC ANCOP Australia Ltd. (ANCOP) guiding principles:

- Our mission to help end poverty, promote justice and uphold dignity.
- Our Code of Conduct stating that our programs and services will have a commitment to the following:
 - a. Workers shall not harass, discriminate or support others who harass and discriminate against others on the grounds of gender, pregnancy, age, race, marital status, disability, sexual preference.
 - b. CFC ANCOP Australia Ltd, is expected to act and protect the interest of children and vulnerable adults and to prevent the occurrence of sexual exploitation, abuse and harassment in the course of their duties. It is with strict compliance that ANCOP adhere with required a fair distribution of economic resources and power through the design and delivery of services.
- Our Safeguarding Policy statements:
 - a. All people, regardless of their age, gender, race, religious beliefs, disability, sexual orientation, or family /social background, have equal rights to protection from abuse, neglect or exploitation.
 - b. ANCOP commits to promoting and protecting the welfare and human rights of people that interact with, or are affected by, our work – particularly those that may be at risk of abuse, neglect or exploitation. We have no tolerance for abuse, neglect or exploitation. We will take a survivor-centric approach in all that we do.
 - c. All volunteers, partners and third parties of ANCOP share responsibility for protecting everyone from abuse, neglect or exploitation. Beyond this, particular people have specific responsibilities, They must carry out their duties without exception.
 - d. ANCOP has a process for managing incidents that must be followed when one arises.

5.1 Recruitment of volunteers

5.1.1 ANCOP follows a recruitment and screening process to verify the integrity of the volunteer applicant and help prevent engagement of any person who poses an unacceptable SEAH risk. This includes:

- Eligibility check – know the person’s capacity to contribute; if with current/previous ANCOP involvement; values and trustworthiness, etc.
- Background check - to know the person more and may involve checks of social media, professional/ school background, associations.
- Reference check - verbal referee check, police check, working with children check (as applicable) and vetting for any previous misconduct of members and volunteers.

5.1.2 ANCOP contracts/ agreements will require members, partners and volunteers to agree to and sign the ANCOP Code of Conduct, Volunteering Policy and relevant policies related to PSEAH and Safeguarding that detail our behavioural expectations.

5.2 Awareness and training.

The induction process and training will ensure awareness of responsibilities and accountabilities and highlight behavioural expectations relative to preventing SEAH within the workplace. All ANCOP members, partners and volunteers are made aware of and are required to sign this policy to signify their understanding of and commitment to its requirements.

5.3 Safe programming and Risk assessment

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Consultation and risk assessment are incorporated in our processes as follows:

- a. Internal planning and design – ANCOP maintains robust controls to identify, manage, monitor and mitigate the risk of SEAH using a risk management approach to its programs.
- b. Consultation with internal and external stakeholders to encourage ownership and awareness among members, volunteers, implementing partners and recipients. We encourage feedback from the affected and/or vulnerable communities and individuals (in particular girls, women and people with disabilities) to better understand the SEAH risks they face and inform them of our complaints mechanism that they can access when needed. Feedback received are then considered in the design and review of this policy.

The ANCOP Project Proposal template contains sections related to project consultations and risk management in areas such as work health and safety, cultural, political, financial, reputational, environmental, governance and any other confidential/sensitive issues.

5.4 Working with partners

Partners work directly and consult with communities and primary stakeholders where the risk of SEAH is highest. They play a vital role in ensuring awareness of expected behaviours and complaints mechanism, as well as managing the behaviour of their staff and responding to and escalating complaints or incidents.

ANCOP will clearly communicate our PSEAH expectations to our partners and require sign-off as stated in section 5.2 of this document, through a documented memorandum of understanding (MOU). We will support our partners in ensuring this policy is extended and aligned with their own PSEAH policy or equivalent and will monitor their implementation and compliance through regular reporting and feedback sessions.

5.5 Reporting

5.5.1 ANCOP supports communities, victims/survivors and whistle-blowers to feel safe, report concerns and be assured that their allegations will be taken seriously. **Refer to ANCOP Complaints policy for details regarding the reporting mechanism and process.**

5.5.2 ANCOP adopts a survivor-centred approach that prioritises the rights, safety, wishes and dignity of survivors. This process is also culture and gender appropriate and considers applicable local legislative frameworks.

The reporting mechanism offers an option for confidentiality or making anonymous reports. ANCOP protects personal information as per ANCOP Privacy policy. Whistleblowers are also protected and supported throughout the reporting and investigation processes according to ANCOP Complaints Policy.

5.5.3 Everyone under the scope of this policy is obliged to report any suspected or alleged incidents of sexual exploitation, abuse, harassment or a non-compliance to this policy, without fear of reprisal or victimisation.

5.5.4 All members, volunteers, partners, recipients/external stakeholders must report any suspicion that an incident has taken place, may be taking place, or could take place.

5.5.5 Support such as counselling and health services to assist the victim/survivor with their recovery will be offered. This may include medical, social, legal and financial assistance, or referrals to such services.

5.5.6 An incident with criminal aspect will be referred and reported to the correct local law enforcement agency where it is safe to do so and is in accordance with the wishes of the victim/survivor. ANCOP also ensures that we understand the local legal reporting obligations in the different countries we operate in.

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6. Communication, Monitoring and Review

- This policy is endorsed by ANCOP leadership and primary accountability rests with the governing body.
- All ANCOP members, partners and volunteers are made aware and sign this policy to signify their understanding of and commitment to its requirements.
- ANCOP policies are available and accessible on our website <https://cfcancop.org.au/> .
- This policy is reviewed every three years using feedback from members, partners and program recipients so as to continuously improve on policy content, implementation and consistency with evolving global standards.

7. References

ANCOP Code of Conduct

ANCOP Safeguarding Policy

CFC Safeguarding Handbook

ANCOP Complaints Policy

ANCOP Volunteering Policy

ANCOP Project Proposal Template and MOA

ACFID Guidance for the development of a PSEAH Policy

8. Revision History

Version	Approval Date	Summary of Changes
V1.0	April 2024	Original policy.

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