

Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy

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Purpose

Scope Global does not tolerate sexual exploitation, abuse or harassment (SEAH). Whilst Scope Global understands that SEAH cannot be eliminated, it is committed to ensuring that it has a robust framework that has both preventive and mitigation strategies including:

- appropriate controls to effectively mitigate its occurrence;
- fostering a culture that espouses ethical behaviour;
- guidelines and policies that communicate clear expectations of ethical behaviour; and
- effective tools for reporting and monitoring.

Scope Global acknowledges that whilst gender is a major factor in SEAH (where the majority of victims/survivors are female and the majority of perpetrators are male), so too does any relationship that has an imbalance of power, such as ability/disability, religion, sexual orientation and worker/beneficiary. Children are specifically at a high risk of SEAH. Scope Global's Child Protection Policy provides specific guidelines regarding incidents involving children.

Scope

This policy applies to all Employees and Award recipients, including:

- Staff;
- Contractors;
- Advisors, Agents and Representatives;
- Board Members;
- Recipients and awardees under the Australia Awards, New Colombo Plan, Alumni, and other DFAT funded scholarship programs; and
- Recipients and awardees under other funded scholarships, such as Endeavour Program and Scholarships SA.

Definitions

This Policy uses the following descriptions of sexual exploitation, sexual abuse and sexual harassment, which combine international and Australian 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. 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, personnel and contractors.

Standards of Conduct

All employees, contractors and award recipients are required to exhibit the highest standards in their personal and professional conduct.

As a Scope Global employee or contractor you are required to:

- Act with the highest standards of integrity and in accordance with applicable Scope Global policies and procedures and objectives;
- Adhere to all legislative requirements and to lawful directions that relate to your job functions, responsibilities and contractual obligations;
- Comply at all times with lawful and reasonable direction; and
- Treat all persons with respect.

As a recipient or Alumni under the Australia Awards or New Colombo Plan you are required to:

- Act with the highest standards of integrity and in accordance with your Scholarship Agreement;
- Adhere to all lawful directions that relate to your Scholarship;
- Comply at all times with lawful and reasonable direction; and
- Treat all persons with respect.

PSEAH Framework

Scope Global is responsible for ensuring that it has effective strategies that support the prevention of sexual exploitation, abuse and harassment.

It advocates an enterprise wide approach to ensure that PSEAH is integrated throughout the organisation. As such, PSEAH requirements are included in the following activities:

- Pre-employment due diligence: police checks and references are undertaken for all relevant employees;
- Contractual requirements: PSEAH requirements are included in employee contracts and services agreements for contractors;
- Employee awareness training: PSEAH awareness training is included in the employee induction process;
- Scholar awareness training: PSEAH awareness training is provided to all scholars as part of the Scholars Briefing process;

- Other PSEAH awareness training: PSEAH awareness training is provided periodically to Contractors, Board Members, Advisors, Agents and Representatives; and
- Reporting and monitoring: Scope Global has an incident reporting system that includes SEAH incidents. All incidents involving SEAH are escalated to the Head of People and Culture for monitoring and oversight. All SEAH incidents are reported to the Executive Management and Board for oversight.

Reporting of PSEAH Incidents

Scope Global has systems and policies in place that promote the reporting of incidents by being accessible and straightforward. All reports are investigated thoroughly and with confidentiality, ensuring that the safety and needs of the victim/survivor are prioritised and respected. Scope Global has a whistleblower framework in place for those that seek protection under this mechanism.

Employees and award recipients are required to report to a manager or case worker, and contractors to their Scope Global Representative, any SEAH behaviour by another employee, award recipient, contractor or program host organisation they consider to be unethical or exhibits inappropriate behaviour. The manager, case worker or Scope Global Representative will manage the allegation according to Scope Global's Incident Response Management Plan (IRMP). In the circumstance in which a manager, case worker or Scope Global Representative is considered to have behaved unethically or inappropriately in accordance with the scope of this policy, employees, contractors and award recipients are required to report to the Head of People and Culture. SEAH incidents resulting in serious compromise of employee, contractor or participant safety are rated as a Major or Severe incident, and as such require immediate action and escalation. A Major (Level 4) or Severe (Level 5) incident involving SEAH will be reported to the Executive Management and Scope Global Board for oversight.

Reporting to DFAT

The relevant program Contractor Representative or Senior Manager is responsible for reporting all Major (Level 4) or Severe (Level 5) SEAH incidents to DFAT.

A SEAH incident assessed as Moderate (Level 3) or below according to Scope Global's Incident Response Management Plan (IRMP) will be reported to DFAT by the relevant Program Manager.

All alleged cases of SEAH perpetrated by anyone within the scope of this Policy must be reported to DFAT within two (2) working days of becoming aware of the incident.

In regard to non-compliance with DFAT's PSEAH policy requirements, including non-compliance with the principles, must be reported to DFAT within five (5) working days.

Reports of alleged SEAH incidents are required to be submitted using the DFAT Sexual Exploitation, Abuse and Harassment Incident Notification Form and emailed to: seah.reports@dfat.gov.au

Risk Assessment

To ensure that the risk of SEAH is managed appropriately, all Program Managers will include an assessment of SEAH as part of the standard risk management process to ascertain the level of exposure of SEAH within their Program and the corresponding mitigation strategies. The risk assessment will consider factors such as the likelihood of exploitive sex and relationships such as transactional sex and fraternisation.

Related Documents

- Scope Global Code of Conduct Policy
- Scope Global Child Protection Policy