

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

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1. Introduction

ABV is committed to creating safe, respectful and empowering environments for all communities we work with. We take proactive steps to prevent sexual exploitation, abuse, harassment, sex-based harassment, discrimination, victimisation and other unlawful conduct.

We acknowledge that development contexts can heighten inequitable power dynamics and increase vulnerability within the communities we work with. For this reason, ABV upholds the highest professional and ethical standards and expects all staff, volunteers, partners, and representatives to demonstrate non-discriminatory, respectful behaviour always. Misconduct, abuse of power, or exploitation of any person's vulnerability is never tolerated.

Our safeguarding approach reflects ABV's values of respect, partnership, and community led change, and is aligned with the Department of Foreign Affairs and Trade (DFAT) standards, the ACFID Code of Conduct, and the ACNC External Conduct Standard 4 – Protection of Vulnerable Individuals, Sex Discrimination Act, Fair Work Act 2009 and Australian Human Rights Commission. These frameworks guide us in ensuring that safeguarding expectations are consistently upheld across all ABV work, programs, partnerships, and community engagement activities.

2. Purpose

The purpose of this policy is to:

- 2.1 Ensure that ABV's workplace, programs and activities are free from Sexual Exploitation, Abuse and Harassment (SEAH).
- 2.2 Provide clear guidelines for reporting, investigating and addressing allegations of SEAH.
- 2.3 Ensure a safe and respectful environment for all individuals engaged with ABV.
- 2.4 Uphold ABV's commitment to ethical behaviour and compliance with the prevention of SEAH regulatory standards and best practices.

3. Scope

This policy applies to all but not limited to:

- 3.1 All ABV personnel, including employees, directors, volunteers, interns, contractors, consultants, and representatives of ABV ('ABV Personnel')
- 3.2 Partner organisations to the extent that safeguarding obligations have been agreed through contracts, funding agreements, partnership agreements, Memoranda of Understanding, Letters of Agreement or other documented arrangements with ABV. Where appropriate, these obligations may also extend to a partner's employees, volunteers, contractors and representatives involved in ABV-supported activities.

4. Definitions

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

Retaliation: Any negative action taken against an individual who reports a violation of this policy or participates in an investigation, including discrimination or harassment.

Sexual Abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Examples of acts of sexual exploitation and abuse include, but are not limited to:

- I. Sexual assault (any unwanted or forced sexual act committed without consent) or threat thereof. Sexual assault can occur either against a person's will, by force or coercion, or when a person is incapable of giving consent, such as when they are under duress, under the influence of drugs or alcohol. Force includes:

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- a. actual physical aggression, including but not limited to rape, forcible sodomy, forcible oral copulation, sexual assault with an object, sexual battery, forcible fondling (unwanted kissing or touching)
 - b. threats of physical aggression
 - c. emotional coercion
 - d. psychological blackmailing
- II. Forcing someone to have sex with anyone
 - III. Forcing a person to engage in prostitution or pornography or videotaping or photographing sexual acts and posting it without permission
 - IV. Refusing to use safe sex practices
 - V. Alleging or threatening to allege that anyone already has a history of prostitution
 - VI. Insisting on anything sexual that may be uncomfortable, frightening or hurtful
 - VII. Demanding sex in any context or telling someone that they or anyone else are obliged to have sex as a condition for anything.

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: Unwanted physical, verbal or non-verbal conduct of a sexual nature that can include indecent remarks or sexual demands. Examples of behaviour that could be considered sexual harassment include, but are not limited to:

- I. Unwanted physical contact, sexual suggestions, or demands
- II. Making obscene or sexually suggestive remarks, insults or jokes that may cause offense
- III. Name-calling with sexual epithets
- IV. Sending explicit or sexually suggestive emails
- V. Intrusive enquiries into a worker's private life.

Transactional Sex: The exchange of money, employment, goods, services or other benefit for sex, including sexual favours.

5. Policy

5.1 GUIDING PRINCIPLES

All ABV Personnel must uphold ABV's commitment to preventing sexual exploitation, abuse and harassment by following these principles:

- 5.1.1 Zero Tolerance:** ABV has zero tolerance for any form of SEAH and zero tolerance for failure to report concerns or incidents.
- 5.1.2 Respect and Integrity:** All individuals have the right to a safe and respectful environment, free from any form of SEAH.
- 5.1.3 Diversity and Inclusion:** ABV is committed to fostering diverse, equitable and inclusive environments where all individuals are treated with dignity and respect, regardless of their sex, gender, sexual orientation, age, disability, race, ethnicity, religion, cultural background or any other protected attribute.
- 5.1.4 Support:** ABV is committed to supporting victims/survivors throughout reporting and resolution processes.
- 5.1.5 Accountability and Transparency:** All ABV Personnel must act ethically and transparently; any breach of this policy will result in appropriate disciplinary action.
- 5.1.6 Shared Responsibility:** Preventing SEAH is a collective responsibility. All persons must actively contribute to maintaining safe, respectful environments.

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- 5.1.7 Transactional Sex:** Engaging in transactional sex while involved in any ABV activity is strictly prohibited.
 - 5.1.8 Fraternisation:** Fraternisation while engaged in ABV activities is prohibited due to the inherent power imbalance and associated safeguarding risks.
 - 5.1.9 Compliance:** ABV Personnel must always follow ABV's PSEAH Code of Conduct and this policy.
 - 5.1.10 Mandatory Reporting:** ABV Personnel must report any SEAH incident, concern, suspicion or breach immediately through ABV's reporting channels.
 - 5.1.11 Victim/ Survivor-Centred Approach:** ABV Personnel must prioritise the safety, wishes and well-being of the victim/survivor in all responses to SEAH.

5.2 RESPONSIBILITY FOR IMPLEMENTATION

- 5.2.1 Board of Directors:** The Board ensures strong governance of PSEAH by embedding safeguarding in decision-making, resourcing the framework and monitoring reports.
- 5.2.2 Executive:** The Executive provides strategic leadership for the prevention of SEAH. The Executive oversees and manages serious concerns and ensures effective organisation-wide risk management. They are responsible for ensuring that appropriate measures to prevent and respond to relevant unlawful conduct are developed, documented, communicated, and effectively implemented across their areas of responsibility.
- 5.2.3 Policy and Compliance Officer (Focal Lead):** Manages the implementation of ABV's PSEAH policy and procedures by ensuring safeguarding requirements are embedded into operational processes, monitoring compliance, coordinating policy updates, and supporting ABV Personnel to understand and meet their obligations. The role also includes coordinating with the CEO incident reporting and ensuring timely escalation, as well as maintaining accurate and confidential safeguarding records.
- 5.2.4 Human Resources (HR):** ABV's HR framework integrates safeguarding into recruitment and performance systems, maintains compliance and vetting records, and ensures all ABV Personnel complete required PSEAH and checks.
- 5.2.5 Line Managers and Volunteer Managers:** Line Managers and Volunteer Managers embed safeguarding into their operational areas, support integration and knowledge of PSEAH obligations within their teams and promote a culture of accountability and safety across teams.

5.3 CODE OF CONDUCT

ABV has developed a PSEAH Code of Conduct to provide clear guidance on preventing sexual exploitation, abuse and harassment, and to set out the standards of behaviour expected of all ABV Personnel at all times. All ABV Personnel are required to read and sign the ABV PSEAH Code of Conduct ([Attachment A](#)) as a condition of their engagement with ABV.

5.4 WORKING WITH PARTNERS

- 5.4.1** ABV applies a risk-based and proportionate approach to SEAH safeguarding requirements for Partner organisations. Safeguarding obligations will be determined having regard to:
 - I. the nature of the partnership;
 - II. the partner's role in program delivery;
 - III. whether the partner is implementing activities on behalf of ABV;
 - IV. the potential for contact with vulnerable individuals through program activities; and

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- V. any contractual, donor, regulatory or legal requirements.

5.4.2 ABV will:

- I. undertake due diligence proportionate to the safeguarding risks associated with the partnership;
- II. if appropriate support partners to develop their own SEAH policies and procedures;
- III. permit partners with limited safeguarding capacity to adopt ABV's PSEAH policies if appropriate;
- IV. work collaboratively to include safeguarding clauses, proportionate to the safeguarding risks of the relationship, in relevant contracts, subcontracts, grant agreements, partnership agreements, Memoranda of Understanding and Letters of Agreement.

5.4.3 Where a Partner is delivering activities on behalf of ABV, or where ABV determines that a partnership presents elevated safeguarding risks, ABV will require the Partner to:

- I. adopt ABV's PSEAH Policy and PSEAH Code of Conduct; or
- II. maintain equivalent safeguarding policies, procedures and practices that meet applicable DFAT requirements.

5.5 RISK MANAGEMENT

ABV takes a risk-based approach to the management of SEAH risks in its business activities and has implemented policies, processes and procedures to manage these risks, as outlined in this policy.

5.5.1 Risk Register

SEAH will be a standard inclusion on ABV's Strategic Risk Register and Operational Risk Register that will be monitored, reviewed and reported to the Board on a regular basis. The Executive will provide the Board with regular reports on any SEAH incidents, concerns, or investigations.

5.5.2 Risk Assessments

ABV will undertake documented SEAH risk assessments for all workplaces, programs and activities before personnel are deployed and/or activities commence. Risk assessments will identify relevant SEAH risks and mitigation measures appropriate to the activity and operating context. Risk assessments will be reviewed at least annually and updated as required where there are significant changes to the activity, location, operating environment or identified risks. The Risk Officer will nominate appropriate program personnel to undertake risk assessments.

5.5.3 Reporting Mechanisms

Robust and confidential reporting mechanisms as outlined in this policy will be implemented and reviewed/evaluated on a regular basis by the Policy and Compliance Officer.

5.6 RECRUITMENT/SCREENING AND TRAINING OF ABV PERSONNEL

5.6.1 Employment/ Engagement of ABV Personnel

ABV is committed to safeguarding recruitment, selection and screening practices. These practices aim to ensure that the safest and most suitable people are engaged in our work. Requirements include:

- I. Informing applicants of screening requirements during recruitment, including mandatory criminal history checks and Working with Children Checks applicable to the relevant state, territory, or country requirements.

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- II. Requiring all staff to provide proof of identity (e.g., birth certificate, passport, driver's licence) and relevant qualifications. Original documents must be sighted (either in person or via an approved virtual verification process).
 - III. Conducting interviews for all positions, ideally face-to-face, noting that telephone or virtual interviews may be necessary in international/distant location contexts.
 - IV. Conducting personal and employment reference checks.
 - V. Applying a probationary period to all positions, dependent on the length of the contract.

5.6.2 Engagement of Skilled Business Professionals (SBPs) and Corporate Volunteers

ABV is committed to safe recruitment, selection and screening of SBPs and Corporate Volunteers. Requirements include:

- I. Conducting interviews for all positions, either in person, via telephone or virtually. Interviews will include safeguarding specific questions addressing a candidate's ability to work safely with vulnerable people.
- II. Requiring all SBPs and Corporate Volunteers to read and sign Acknowledgement of ABV's PSEAH Policy and Code of Conduct ([Attachment A](#)) during onboarding and pre-assignment training.
- III. Recruiting in accordance with ABV's volunteer registration process which include mandatory criminal history checks and Working with Children Checks applicable to the relevant state, territory, or country requirements.

5.6.3 Ongoing Monitoring

Ongoing PSEAH practices include:

- I. All ABV Personnel must read and sign Acknowledgement of ABV's PSEAH Policy and Code of Conduct ([Attachment A](#)).
- II. All staff must maintain a police check and, a current ~~Working~~ Working with Children Check (WWCC) applicable to the relevant state, territory, or country requirements on file.

5.6.4 Training

ABV is committed to ensuring all ABV Personnel are equipped with the knowledge, skills and confidence needed to uphold the PSEAH Code of Conduct and this policy.

- I. Training on ABV's Code of Conduct and PSEAH Policy is mandatory during induction of all ABV Personnel and refresher/updated training is to be conducted on a regular basis (annually at a minimum).
- II. Training may be delivered in person or online.
- III. The Training & Development Officer and Compliance Officer will monitor completion of induction training and refresher training of all ABV Personnel. Statistics will be forwarded to the CEO and Board regularly for oversight.

5.7 REPORTING AND INVESTIGATION

5.7.1 What should you do if you are being sexually exploited, abused or harassed?

If you are being sexually exploited, abused or harassed, it is important to follow a safe protocol to protect yourself and address the situation effectively. Here is ABV's recommended approach:

- I. **Prioritize Your Safety:** If you feel threatened or unsafe, take immediate steps to protect yourself, such as removing yourself from the situation or seeking assistance from law enforcement.

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- II. Document the Incident: Keep a detailed record of the incident, including dates, times, locations, what was said or done, and any witnesses. This documentation can be crucial if you decide to report the harassment.
 - III. Seek Support: Talk to a trusted colleague, friend, or family member about the situation.
 - IV. Report the Harassment: If you feel safe doing so, report the harassment in accordance with this policy
 - V. Consider External Support: If internal reporting does not resolve the issue or if you feel uncomfortable reporting internally, you can contact external bodies such as the Fair Work Commission or the Australian Human Rights Commission for guidance and support if you are based in Australia.
 - VI. Explore Legal Options: Consider seeking legal advice to explore your options for further action.

5.7.2 Emergency: If a victim/survivor is in immediate danger, Emergency Services should be called:

- a. Australia: 000 (Police & Ambulance)
- b. Papua New Guinea: 000 (Police & Ambulance)
- c. Solomon Islands: 988 (Fire & Emergency Services), 999 (Police)
- d. Vanuatu: 111, 22222 (Police) or 22100 (Ambulance)
- e. Tonga: 911, 922 (Police), 999 (Fire), or 933 (Ambulance)
- f. Samoa: 911 (Police & Ambulance)
- g. Fiji: 911 (Police & Ambulance)
- h. Naoero: 110 (Police) 111 (Ambulance)

5.7.3 Obligation: All ABV Personnel are required to report any observed, suspected or alleged incidents of SEAH as soon as possible or within 24hrs of becoming aware of the alleged incident. There is no obligation for the victim-survivor to report an incident that has happened to them. Nevertheless, in this situation reporting is encouraged if there is reasonable belief that not reporting an incident has the potential for negative consequences for another individual. Informed consent of the victim-survivor prior to sharing any identifying information must be obtained before making a report.

5.7.4 All ABV Personnel are required to:

- a. Report observed or suspected incidents of SEAH;
- b. Report any suspected breach of the ABV PSEAH Policy or Code of Conduct;
- c. Report via the procedure outlined in this policy; and
- d. Report immediately to DFAT where the allegation or concern arises in the context of DFAT-funded activities, as DFAT requires immediate reporting (within 2 working days of becoming aware) of any observed, suspected or alleged SEAH.

5.7.5 Who can report: All ABV Personnel are mandatory reporters, and community members, and participants of ABV programs and activities are encouraged to report.

5.7.6 What to report: any observed, suspected or alleged incidents of SEAH. Any breach of ABV's PSEAH Policy or Code of Conduct. When in doubt, report.

5.7.7 Child Protection: For any reports of abuse, exploitation or harassment involving an individual under 18 years of age, please refer to ABV's Child Protection Policy.

5.7.8 When to report: Must be reported immediately (within 24 hrs) to the Compliance Officer and CEO (the person making the report should ensure that they receive an acknowledgement of receipt). Reports may also be reported in accordance with ABV's Reporting Wrongful Disclosures or Complaints Management Policies or through the following channels:

- a. Directly to the reporter's main contact within ABV
- b. Directly to the reporter's Line Manager
- c. Directly to ABV's management team
- d. Directly to ABV's Program Manager (if overseas)

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- e. Directly to an ABV Board member in writing (a request can be made to ABV's CEO for the appropriate contact details)

If a person receives a report in accordance with a-e above, they must ensure that the CEO and Focal Lead are informed immediately (if not already). If it is considered to be a conflict of interest to notify the CEO and Focal Lead, then the Chair of the Board should be notified immediately.

5.7.9 How to report: Reports may be made verbally or by submitting a PSEAH Incident Notification Form [Attachment B](#) and can be directed to welfare@abv.org.au. Any verbal report should be followed up with a completed PSEAH Incident Notification Form if possible.

5.7.10 DFAT Funded Programs: For DFAT funded projects incidents must be reported to DFAT within two working days of ABV becoming aware of an alleged incident via seah.reports@dfat.gov.au or please telephone +61 2 6178 5100.

5.7.11 Upon receipt of the incident report, the CEO and Compliance Officer will review according to the procedures in [Attachment C](#) and Safeguarding Response Flowchart in [Attachment D](#).

5.7.12 All ABV Personnel should ensure that they follow the procedures and advice in [Attachment C](#).

5.7.13 ABV will not reveal any victims'/survivors' personal details to anyone outside the organisation without their consent, unless required by law. Internal confidentiality will also be a priority, to the extent possible, with respect to the details of allegations and the identity of people involved.

5.8 COMMUNICATION OF THIS POLICY

All ABV Personnel will be informed of the expected behaviour of ABV personnel and others working with ABV programs and will be informed of how they can report suspected or alleged misconduct. This information will be in accessible formats and if deemed necessary translated into appropriate languages. This policy will be made available on the ABV website.

5.9 BREACH OF POLICY/RETALIATION

- 5.9.1 Violations of this policy will be met with disciplinary measures appropriate to the severity of the breach, which may include termination of employment, volunteer status or contractual relationships.
- 5.9.2 ABV prohibits any form of retaliation against individuals who report violations or participate in investigations. Retaliatory actions will be addressed with appropriate disciplinary measures.
- 5.9.3 Disciplinary actions will be based on the severity of the policy breach and may range from warnings to termination of employment or contract.
- 5.9.4 Accused individuals will have the opportunity to respond to allegations and participate in the investigation process in accordance with the principles of natural justice and procedural fairness.

5.10 CONFIDENTIALITY

- 5.10.1 Information regarding allegations and investigations will be kept confidential and shared only with those directly involved in the resolution process.
- 5.10.2 Documentation related to reports, investigations, and actions taken will be securely maintained and stored.

5.11 MONITORING AND EVALUATION

This policy will undergo regular monitoring and evaluation (every two years at a minimum) in the interest of continual improvement. The Compliance Officer will be responsible for monitoring and evaluation. Feedback from staff and volunteers will be incorporated into policy revisions.

6. Related Documents

Risk Management Policy
Operational Risk Register
Reporting Wrongful Disclosures Policy
Complaints Management Policy
Child Protection Policy

7. Document Information

Policy Owner:	CEO
Policy Authority:	Board
Policy Implementer:	Policy and Compliance Coordinator
Original approval:	14 August 2026
Last Reviewed:	14 August 2026
Last Policy Change:	14 August 2026
Next review date:	14 August 2029

Attachment A: ABV PSEAH POLICY AND CODE OF CONDUCT ACKNOWLEDGEMENT

I have received and read ABV's PSEAH Policy. I agree to be bound by the terms of the policy and agree that in the course of my association with ABV I will:

- Uphold the integrity of ABV by ensuring that my professional and personal conduct is, and is seen to be, of the highest standard and consistent with ABV's values, ethics and code of conduct.
- Act with integrity and professionalism, abide by the relevant Australian and local law in all areas of work.
- Promote and model the highest levels of professional conduct with program participants, partners and colleagues. Trust forms the basis of successful development work and must be protected.
- Take steps, within the scope of my role, to prevent sexual exploitation, abuse or harassment of any person.
- Promote and advocate for adherence to this Code of Conduct and ABV's PSEAH Policy including with partners and associated personnel.
- Treat people with respect regardless of race, nationality, ethnicity, language, religion, indigeneity, ability, age, displacement, caste, gender, gender identity, sexuality, sexual orientation, poverty, class, socio-economic status, or any other status.
- Endeavour to provide an inclusive, welcoming and safe environment for all people, and vulnerable adults.
- Contribute to a culture of openness to enable any issues or concerns to be discussed.
- Foster a sense of accountability among personnel and associated personnel so that unacceptable practices or potentially exploitative or abusive behaviours do not go unchallenged.
- Avoid circumstances where my behaviours may be perceived as hostile, neglectful, exploitative, abusive or inappropriate to vulnerable adults.
- Make myself aware of situations which may present risks and manage them accordingly.
- Immediately report any concerns, allegations or disclosures related to sexual exploitation, abuse or harassment in line with ABV's PSEAH Policy
- Participate in PSEAH training, supervision and performance processes, as required for my role.

Prohibited Behaviour: I understand that ABV maintains a zero-tolerance stance toward sexual exploitation, abuse or harassment (SEAH). Any form of SEAH is categorically unacceptable.

I agree I must never:

- Engage in sexual harassment, discrimination, bullying, victimisation, or other inappropriate workplace behaviour that undermines a safe, respectful, and inclusive work environment.
- Engage in sexual relationships with program participants or beneficiaries. These relationships are inherently based on unequal power dynamics. Such relationships undermine the credibility and integrity of ABV's programs.
- Exchange money, employment, goods or services for sex, including sexual favours while working or volunteering with ABV (Transactional Sex). This includes the exchange of assistance that is due to program participants. This also includes a prohibition on engaging the services of sex workers even when it is legal to do so and further prohibits the procurement of sex for others or the use of a third party to do so.
- Use any form of humiliating, degrading or exploitative behaviour.
- Use ABV or partner organisation facilities, vehicles, personnel, or resources for the purpose of arranging or facilitating access to sex workers by any person, including visitors to ABV or partner offices or programs
- Use computers, mobile phones, video cameras, cameras or other technology inappropriately, or to exploit or harass, or access and disseminate exploitative material of any person, including child sexual abuse or exploitation material, through any medium including social media.
- Fraternise, when working on, deployed or engaged in the delivery of an activity that is assessed as very high risk for sexual exploitation, abuse or harassment.

Consequences of Breach

I understand that any breach of ABV's PSEAH Policy or Code of Conduct may result in disciplinary action, including removal from an assignment or role, termination of employment/engagement, and reporting to relevant authorities where required.

(PRINT NAME)

(SIGNATURE)

(DATE)

Attachment B: PSEAH Incident Form

ABV – PSEAH Incident Notification Form**Confidential**

This reporting form may be used by ABV personnel (staff, volunteers, contractors, consultants) as well as other stakeholders, including community members, partner organisations, program participants, or any individual wishing to report a safeguarding concern. Informed consent of the victim-survivor prior to sharing any identifying information must be obtained before making a report.

Please complete this form with as much detail as possible. However, partially completed forms will still be accepted and reviewed, and should be submitted even where full information is not available at the time. No report will be disregarded solely because it is incomplete.

The form is intended for reporting concerns relating to protection from sexual exploitation, abuse and harassment and must be submitted directly to the ABV CEO and Focal Lead at welfare@abv.org.au. All information shared through this form will be handled confidentially and strictly on a need-to-know basis.

ABV collects and uses your personal information to assist in maintaining safe environments for vulnerable individuals during the delivery of its business activities. ABV may contact you regarding the information you have provided. ABV may also disclose relevant information to regulators and/or law enforcement agencies so that any threat to a survivors' welfare, or wellbeing can be appropriately investigated.

Section	Details
1. Reporter Details	
Name or code (if anonymous):	
Role/relationship to ABV:	
Contact details (email/phone):	
Date and time of reporting:	
2. Incident Details	
Date and time of incident:	
Location (country, city/town, project site):	
Description of incident:	
Type of SEAH¹:	Sexual Exploitation / Sexual Abuse / Sexual Harassment

¹ **Sexual Abuse:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

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: Unwanted physical, verbal or non-verbal conduct of a sexual nature that can include indecent remarks or sexual demands.

Immediate safety concerns:	
Actions already taken:	
3. Victim/Survivor Details	
Name or code [do not identify unless consent is obtained]:	
Age or age range:	
Gender:	
Relationship to ABV:	
Consent to report (Yes/No/Unknown):	
Support provided/requested:	
4. Alleged Perpetrator Details	
Name or code:	
Age or age range:	
Gender:	
Relationship to ABV:	
5. Witness Details (if applicable)	
Name(s) or codes:	
Contact (if appropriate):	
Witness account:	
6. Additional Context	
Relevant contextual information:	
Ongoing risks to others:	
8. Declaration	
Reporter name:	
Signature (electronic or handwritten, where available; typed name accepted where a signature is not possible)	
Date:	
Submission Instruction: Submit to CEO and Focal Lead at welfare@abv.org.au . For urgent safety issues, contact local emergency services immediately.	

Confidentiality Statement: Information will be shared only on a need-to-know basis in line with ABV's Privacy Policy. Where possible, the victim/survivor should be de-identified unless consent is obtained to report, consistent with a survivor-centered approach.

Attachment C – Procedures for Determining Appropriate Action Following a SEAH Allegation

1. Prioritisation of Victim-Survivor Needs

ABV will respond to any concerns or allegations of sexual exploitation, abuse and/or harassment in a manner that prioritises the rights and needs of the victim-survivor. This includes ensuring they feel heard, supported and empowered throughout the process.

1.1 Core Principles

ABV will ensure that responses are guided by the following principles:

- a. **Dignity and respect:** Treat the victim-survivor with dignity and respect.
- b. **Appropriate response to disclosures:** Follow the guidance in this policy when responding to disclosures by a victim-survivor.
- c. **Confidentiality and privacy:** Protect privacy and confidentiality, including the secure handling and storage of information.
- d. **Non-discrimination:** Ensure no discrimination based on gender, age, race/ethnicity, ability, sexual orientation, or other characteristics.
- e. **Access to support services:** Support to access to the victim-survivor for counselling, medical care, psychosocial support, and safeguarding measures.

1.2 Confidentiality and Information Management

Confidentiality is a key principle in reporting and managing SEAH concerns. Information must only be shared with the CEO, Focal Lead, and relevant Program Lead(s). Names and details of reports must remain confidential. Information is disclosed only:

- a. On a “need to know” basis, or
- b. Where required by law or reporting obligations (e.g. police, regulatory or child protection authorities).

1.3 Good Faith Reporting and Protections

All reports made in good faith will be seen as being in the best interests of the victim-survivor. ABV will protect the interests of anyone reporting concerns in good faith. ABV is committed to ensuring privacy, and support for the psychological and physical safety for individuals who report. Any ABV Personnel who intentionally makes false or malicious allegations may face disciplinary action.

2. STEP 1: Immediate Response

The CEO, in consultation with the Compliance Officer and Program Lead(s) (for overseas matters), must take the following immediate steps:

- a. Conduct a rapid risk assessment to identify urgent safety concerns.
- b. Provide immediate victim-survivor support, including referrals to medical services, counselling, social support or legal assistance.
- c. Offer support to the reporter, witnesses and any other stakeholders.

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- d. Document all actions taken, decisions made and reasons for those decisions.

3. STEP 2: Actions

3.1 If the alleged incident occurred overseas:

The CEO, Compliance Officer and relevant Program Lead(s) must consider:

- a. Interviewing the reporter and/or any witnesses to gather further information either internally or using qualified experts.
- b. Reporting the matter to local police or protection authorities, considering local laws and requirements.
- c. If the alleged perpetrator is an overseas citizen, whether reporting to their home-country police (i.e. the Local Police or Australian Federal Police) or authorities is required or appropriate.
- d. Whether the matter can be managed internally if it is not considered a criminal issue or investigation required.
- e. Whether no further action is required, and ensuring the rationale is clearly documented.

3.2 If the alleged incident occurred in Australia:

The CEO and Compliance Officer must determine appropriate action, which may include:

- a. Interviewing the reporter and/or any witnesses to gather further information either internally or using qualified experts.
- b. Reporting to local police and/or the relevant protection authority.
- c. Reporting to the Australian Federal Police (AFP), particularly for offences involving Commonwealth jurisdiction or online exploitation.
- d. Whether the matter can be managed internally if it is not considered a criminal issue or external investigation required.
- e. Determining that no further action is required, with documented justification.

4. STEP 3: Internal Investigation of ABV Personnel (if required)

- a. If a report involves an ABV Personnel and an internal investigation is required, it will be conducted in a fair, impartial, and victim-survivor centred manner. The CEO and Compliance Officer will consider whether it is appropriate to engage qualified external specialists. In doing so, the following will be considered:
 - i. How independence and objectivity will be maintained throughout the investigation.
 - ii. What resources are available — internally or externally — to ensure the investigation is conducted competently and fairly, taking into account the complexity of the allegation, the level of risk, the skills required, and the need for specialist expertise (e.g. trauma-informed practice, or workplace misconduct investigations).
- b. The investigation process will:
 - i. Follow procedural fairness and natural justice principles.
 - ii. Collect relevant evidence in a systematic, secure and confidential manner.
 - iii. Maintain detailed, confidential records of all evidence and interviews.

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- iv. Ensure that any conflict of interest is declared and managed.

5. **STEP 4: Follow-up**

Records (de-identified) shall be maintained of any investigation and conclusion and DFAT or any other regulatory bodies will be informed of investigation outcomes (where required).

Attachment D: ABV Safeguarding Response Flowchart

