

INF Australia Prevention of Sexual Exploitation, Abuse and Harassment Policy v3

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1 Introduction

INF Australia (INFA) seeks to ensure the dignity and rights of all people we work with are protected and promoted. This policy is intended to ensure that our work provides safety and security for all people from sexual exploitation, abuse and harassment (SEAH) – including staff, volunteers, program participants, beneficiaries and partner organisations.

INFA has no tolerance for any form of sexual exploitation, abuse or harassment and regards this as a violation of respect for the divine image shared by all people and a violation of their fundamental rights and dignity. We recognise that we have a special duty to protect children and other vulnerable people, particularly when such people are brought into relationships which carry inherent vulnerabilities or power imbalances – such as client/provider, beneficiary/program staff, and so on.

We will proactively guard against and respond to SEAH and work to develop and nurture an organisational culture within INFA and our partner organisations that makes prevention of sexual exploitation, abuse and harassment a priority.

2 Purpose

To prevent sexual exploitation, abuse and harassment (SEAH) by INFA staff, volunteers, associates and partners, to protect people we serve and work with, and to ensure clear, survivor-focused response, reporting, investigation and accountability.

3 Scope

Applies to all INFA staff, volunteers, consultants, contractors, board members and partner organisations involved in INFA programs and activities, in Australia and overseas.

4 Policy Statement

4.1 Core principles

- Zero tolerance of SEAH.
- Survivor-centred, confidential and trauma-informed responses.
- Safe, transparent reporting and timely, impartial investigations.
- Duty to report criminal offences to appropriate authorities.
- Prevention through recruitment, training, risk assessment and partner oversight.

4.2 Prohibited conduct (examples)

INFA staff, volunteers, associates and partners must not, under any circumstance:

- Engage in sexual activity with children.
- Sexually exploit, abuse or harass any child or adult.
- Engage in sexual activity (transactional or otherwise) with beneficiaries or program participants.
- Engage in transactional sex with commercial sex workers in the course of INFA duties.
- Procure sex for others.

4.3 Prevention and safer environments

- **Recruitment and screening:** Rigorous pre-employment and partner screening, background checks and references for staff, volunteers and associates.
- **Training and awareness:** Mandatory SEAH and safeguarding training for all staff, volunteers and partner staff; refresher training at regular intervals.
- **Program design and risk management:** SEAH risk assessments incorporated into project cycles with mitigation, monitoring and reporting measures. Gender and power imbalances considered in planning and implementation.
- **Partner obligations:** Partners must maintain compatible SEAH policies and procedures, demonstrate capacity to implement them, and consent to oversight and joint risk mitigation.
- **Codes of conduct:** All personnel must sign and adhere to INFA's Code of Conduct and contractual clauses referencing this policy.

4.4 Reporting and investigation

- **Required reporting:** All concerns, suspicions or allegations of SEAH or breaches of this policy must be reported without delay to the Child Protection and Safeguarding Focal Person (INFA CEO or specified delegate), or to the INFA Chair if the CEO is implicated. Initial reports should be sent to safeguarding@inf.org.au which forwards to the CEO and Chair.
- **Confidentiality and data handling:** Information and evidence will be held securely and confidentially, shared only as necessary for investigation, legal reporting or survivor welfare, and in accordance with data protection obligations. The complainant's identity will not be disclosed without their consent except where law requires disclosure (for example mandatory reporting of child abuse).
- **Protection for reporters:** Good-faith reporters and cooperating witnesses are protected under this policy and under INFA's Whistleblower Policy. Malicious or intentionally false reports are misconduct and may lead to disciplinary action.
- **Notification obligations:** Where allegations may amount to criminal offences or breach national laws, INFA will report to relevant Australian or local authorities without exception for cases involving children, and in adult cases subject to survivor welfare and lawful obligations. Donor reporting obligations (including DFAT) will be met as required.

4.5 Response approach: Support and Care for Affected Persons

- **Survivor-centred care:** Responses prioritise the safety, wishes and wellbeing of affected persons while respecting due process.
- **Referrals and assistance:** INFA will offer referrals and assistance to safe medical, psychosocial, legal and protection services, internally or via trusted local providers.
- **Information and involvement:** Affected persons will be kept informed of investigation progress and outcomes as appropriate and in line with their wishes and welfare.
- **Confidential trauma-informed support:** Where available, INFA will provide trauma-informed care or arrange external specialist support.

4.6 Accountability, disciplinary action and legal consequences

- SEAH is gross misconduct and may result in termination of employment, volunteer assignment or contractual relationships.
- Disciplinary measures include suspension, reassignment to alternative duties, performance management, formal warnings and dismissal according to relevant HR and grievance procedures.
- Allegations involving criminal conduct will be referred to local or Australian authorities and may result in prosecution.
- Where contractual or donor conditions require, contractual remedies or sanctions may be applied to partners or suppliers.

5 Christian Basis for the Policy

As a Christian organisation, we uphold the biblical truth that every person is created in the image of God (Genesis 1:27) and is therefore entitled to dignity, respect, and protection from harm. Scripture consistently affirms that God’s people must not use power, position, or influence to exploit or abuse others. In the Old Testament, God condemns leaders who “ruled harshly and brutally” over the vulnerable for their own gain (Ezekiel 34:4), highlighting His concern for those who are at risk of mistreatment.

Scripture also requires that we “speak up for those who cannot speak for themselves” and defend the rights of the vulnerable (Proverbs 31:8–9), ensuring that no one is taken advantage of, coerced, or harmed.

Sexual exploitation, abuse, and harassment contradict the character of Christ and violate God’s design for human relationships. “Love does no harm to a neighbour” (Romans 13:10), and Christians are called to use their authority to serve, not to dominate (Mark 10:42–45).

This policy affirms our commitment to foster a culture of safety, purity, accountability, and justice; to prevent all forms of sexual exploitation, abuse, and harassment; and to respond promptly and transparently whenever concerns arise, protecting those who are vulnerable and upholding the witness of Christ in all we do.

6 Roles and Responsibilities

Role	Responsibility
Board	Oversight of SEAH policy implementation and accountability.
CEO	Ultimate responsibility for safeguarding, incident notification to Chair and donors, and ensuring investigation and response. Ensure staff compliance, risk mitigation and training.
Safeguarding Focal Person	Receive and coordinate reports, initiate support and investigations, maintain records.
Partners	Implement compatible safeguarding systems and cooperate with INFA processes.

7 Related Documents and Policies

- ACFID Code of Conduct
- Child and Vulnerable Person Safeguarding Policy

- Code of Conduct
- Commonwealth Criminal Code Act 1995
- Complaints Handling Policy
- Disability Inclusion Policy
- Discipline and Grievance Policy
- Equity, Inclusion and Respect Policy
- Gender Equality Policy
- Image Use Guidelines
- Partnership Policy
- Prevention of Bullying and Harassment Policy
- Recruitment Policy
- Sending Policy
- Sending Practice
- Whistleblower Policy

8 Monitoring, Evaluation and Review

The policy is to be reviewed at a minimum every three years, or because of legislative changes and/or practice changes including sectoral.

9 Appendices

Appendix A — Detailed Procedures and Operational Guidance

Appendix B - Prevention of Sexual Exploitation, Abuse and Harassment Code of Conduct

10 Definitions

Term	Definition
Child	A Child is any person under the age of eighteen years as defined by the Convention on the Rights of the Child irrespective of local country definitions of when a child reaches adulthood.
INFA Associates	Any person or persons who are contracted by INFA to provide services or approved by INFA to participate in an INFA-organised trip, trek or other program in Nepal.
INFA Partners	Staff and recognised volunteers or representatives of organisations and groups with which INFA has a formal, documented agreement for the purposes of implementing service, welfare, development or disaster-related programs in line with INFA Partnership Policy and Procedures.
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, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. ¹ This exploitation includes online activities or sharing of images related to the sexual exploitation of a child or vulnerable adult.
Sexual Harassment	Includes all conduct of a sexual or gender-determined nature at the workplace or connected to the workplace that is intended to violate the dignity of a person, or which has this effect. This may include, but is not limited to: • Physical approaches or physical contact of a sexual nature, or sexual assault • Gestures and other nonverbal communication with sexual undertones • Comments of a sexual nature about individuals and/or their body, conduct, sex life or sexual identity • Sexually discriminatory language and humiliating remarks, including sexually explicit jokes • Requests to perform sexual activities • Showing or displaying pornographic or sexist images • Inappropriate questions about an individual's relationship status or details of their relationships • Inappropriate or unwelcome gifts, invitations and working or travel arrangements
Vulnerable adults	Those aged over eighteen years and who identify themselves as unable to take care of themselves/ protect themselves from harm or exploitation; or who, due to their gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.

11 Document Control

Date	Version	Summary of Changes	Sections Changed	Authorised By
April 2019	1	New policy		Board
Oct 2021	2	Ref to INFA Focal Person added Priority for the wishes and welfare of complainants made explicit or clarified	2.3 2.3 & 2.4	Board

¹ The definitions for both Sexual Exploitation and Sexual Abuse are contained in the United Nations Secretary-General's Bulletin, "Special measures for protection from sexual exploitation and sexual abuse" ST/SGB/2003/13 (9 October 2003).

Feb 2026	3	Major revision and reorganisation to new Policy Template	All	Board
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Appendix A Detailed Procedures and Operational Guidance

A1 Reporting pathways and contact points

- Initial reports: safeguarding@inf.org.au (this email forwards to INFA CEO and INFA Chair).
- Alternative reporting: If CEO implicated, report directly to INFA Chair at chair@inf.org.au.
- Internal focal point: Child Protection and Safeguarding Focal Person (CEO or delegate).
- External reporting: Australian Police, local law enforcement, social services, and donor contacts (DFAT) as required by law, risk and donor obligations.

A2 Recruitment and Screening

- For detailed recruitment procedures, see Recruitment Policy. Police checks are advised for staff and volunteer roles. Systems such as <https://www.equifax.com.au/fit2work/> may be used for this.
- Follow up police checks are needed periodically and not just at time of application.

A3 Incident intake and recording

- Record receipt date/time, reporter details (if provided), alleged victim and alleged perpetrator details, summary of allegation, immediate safety concerns, and actions taken.
- Use secure storage and limited access to case files. Maintain chain of custody for evidence.

A4 Immediate safety and interim measures

- Conduct immediate safety assessment and implement protective measures for affected persons (medical care, safe accommodation, separating alleged perpetrator from complainant).
- Interim measures for alleged staff: temporary suspension with pay, reassignment to non-program/non-contact duties, or administrative leave as appropriate to context and risk.
- Document reasons for interim measures, duration, and review dates.

A5 Investigations

- Investigations conducted promptly and impartially by trained personnel or external investigators where conflict of interest exists.
- Preserve confidentiality, evidence and natural justice for all parties.
- Cooperate with law enforcement while preserving survivor safety and wishes, except where mandatory reporting obligations apply.
- Investigation reports to include findings, recommended actions and follow-up steps.

A6 Decision-making, sanctions and HR process

- Use established HR, disciplinary and grievance procedures to determine sanctions following investigation outcomes.
- Sanctions may include termination, dismissal, referral to authorities, professional reporting (where applicable) and referral to regulatory bodies.

- Document all decisions, rationale and communications.

A7 Contracts, clauses and procurement

- All employment contracts, volunteer agreements, consultant and supplier contracts must include explicit SEAH prohibitions and related conduct clauses (including prohibition on transactional sex with beneficiaries, requirement to comply with this policy, mandatory reporting obligations, and right to audit/monitor).
- Partner agreements must require partners to maintain SEAH policies, adhere to INFA safeguarding standards, train staff and permit monitoring and remedial action.
- Donor and subcontractor clauses to be aligned with donor safeguarding requirements.

A8 Suspension, reassignment and “other duties”

- Where allegations are received, INFA may:
 - Place the alleged person on paid administrative leave pending investigation, or
 - Reassign to alternative duties that remove any risk of contact with beneficiaries, or
 - Impose other restrictions necessary to protect affected persons and preserve investigation integrity.
- Decisions on suspension or reassignment will be documented, time-limited, regularly reviewed and proportionate to the risk.

A9 Legal reporting and prosecution

- Allegations involving criminal conduct or mandatory-reporting circumstances (especially where children are involved) will be reported to relevant law enforcement and statutory child protection agencies.
- INFA will cooperate with police and judicial processes while ensuring survivor safety and confidentiality.
- Where prosecution proceeds, INFA will follow legal advice regarding staff suspension, termination and disclosure obligations.

A10 Confidentiality, data protection and records retention

- Maintain secure case records; limit access to need-to-know staff.
- Follow applicable data protection and privacy laws for storage, retention and sharing of records.
- Retain records for periods required by law, donor conditions and organisational policy.

A11 Support services and referrals

- Maintain a list of trusted medical, psychosocial and legal service providers in program countries.
- Offer immediate medical referral, psychosocial counselling, legal advice and protection services as needed and requested by the affected person.
- Document referrals and follow-up actions with consent.

A12 Training, monitoring and assurance

- Mandatory induction safeguarding training for all new staff and volunteers; annual refresher training.
- Partner capacity assessments and periodic safeguarding audits.
- Program-level SEAH risk registers and monitoring indicators integrated into project reporting.
- Periodic policy review and lessons-learned processes after incidents.

A13 Whistleblower protections and misconduct handling

- Good-faith reporters and witnesses are protected under this policy and INFA's Whistleblower Policy.
- Malicious reporting with intent to harm is misconduct and will be addressed via disciplinary procedures.

A14 Communication and transparency

- Communicate the policy and reporting channels clearly to staff, volunteers, partners and communities.
- Provide accessible, confidential reporting options for community members and beneficiaries.
- Maintain transparency with donors and regulators about material incidents as required, while safeguarding confidentiality of individuals.

A15 Review and continuous improvement

- Policy to be reviewed at least every three years, or in response to any legislative changes and significant incidents.
- Implement corrective actions, update procedures and share learning across INFA and partners.

A16 Quick checklist for operational use

- Reporting email: safeguarding@inf.org.au.
- If CEO implicated: chair@inf.org.au.
- Immediate safety: remove risk, refer for urgent medical/psychosocial care.
- Interim measures: suspension with pay or reassignment to "other duties" where appropriate.
- Legal: report to police/local authorities where required.
- Contracts: include SEAH clauses in all agreements.

Appendix B Prevention of Sexual Exploitation, Abuse and Harassment Code of Conduct

I, [], acknowledge that I have read and understood INFA's Prevention of Sexual Exploitation, Abuse and Harassment Policy and agree that while representing INFA, I must:

- Treat all people with dignity and respect, regardless of gender, age, race, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Not use language or behaviour that is inappropriate, harassing, abusive, sexually provocative, demeaning, discriminatory, or culturally inappropriate.
- Not engage in any form of sexual exploitation, abuse, or harassment of children, adults, beneficiaries, program participants, colleagues, or partners.
- Not engage in transactional sex or procure sexual services while representing INFA or in connection with INFA duties.
- Not use my position of power or trust to exploit or coerce others into sexual activity.
- Not exchange money, employment, goods, or services for sexual favours or relationships.
- Ensure that professional boundaries are maintained at all times in relationships with beneficiaries, program participants, and colleagues.
- Use computers, mobile phones, video, and digital cameras appropriately, and never to exploit, harass, or access sexually abusive or exploitative material.
- Immediately report concerns or allegations of sexual exploitation, abuse, or harassment, or non-compliance with this policy, in accordance with INFA's reporting procedures.
- Immediately disclose all charges, convictions, and other outcomes of an offence, which occurred before or occurs during my association with INFA that relate to sexual exploitation, abuse, or harassment.
- Comply with all relevant Australian and local legislation relating to sexual exploitation, abuse, and harassment.

When photographing, filming, or using images of beneficiaries, program participants, or community members for work-related purposes, I must:

- Assess and comply with local traditions or restrictions for reproducing personal images before photographing or filming.
- Obtain informed consent from the individual (and parent/guardian if a child) before photographing or filming, explaining how the image will be used.
- Ensure images present people in a dignified and respectful manner, not in vulnerable or submissive poses, and that subjects are adequately clothed.
- Ensure images are honest representations of the context and facts.

- Ensure file labels, metadata, or text descriptions do not reveal identifying information when sending or publishing images.

I understand that the onus is on me, as a person associated with INFA, to use common sense and avoid actions or behaviours that could be construed as sexual exploitation, abuse, or harassment in any form.

Print name: _____

Signed: _____

Date: _____