



# RAWCS Prevention of Sexual Exploitation, Abuse and Harassment Policy

JUNE 2024

## Table of Contents

<b>1. INTRODUCTION .....</b>	<b>3</b>
<b>2. PRINCIPLES .....</b>	<b>5</b>
<b>3. POLICY COMMITMENTS .....</b>	<b>6</b>
<b>4. REPORTING AND INVESTIGATION .....</b>	<b>8</b>
<b>5. ROLES AND RESPONSIBILITIES .....</b>	<b>10</b>
<b>6. POLICY DISTRIBUTION .....</b>	<b>10</b>
<b>7. REVIEW .....</b>	<b>11</b>
<b>8. MORE INFORMATION .....</b>	<b>11</b>
<b><i>DOCUMENT REVISION HISTORY .....</i></b>	<b>11</b>
<b>APPENDIX 1: INCIDENT REPORTING FORM .....</b>	<b>12</b>

## 1. Introduction

### 1.1 *Who we are*

1.1.1 Rotary Australia World Community Service Ltd (RAWCS) is a registered charity with the Australian Charities and Not-for-profits Commission (ACNC). We back doing good by supporting and facilitating a broad range of humanitarian and development projects, both in Australia and in developing countries. RAWCS administers three Tax Deductible funds:

1. **Rotary Australia Overseas Aid Fund (RAOAF):** This fund supports efforts by Rotary Clubs, Rotary Districts and other partners to deliver humanitarian assistance in developing countries. RAOAF focuses on both sustained development and immediate disaster response, working collaboratively with communities to deliver impactful, sustainable projects to meet identified needs.
2. **Rotary Australia Benevolent Society (RABS):** RABS supports Rotary Clubs, Rotary Districts and other partners to respond to specific community challenges within Australia. It offers an avenue for wider community involvement through tax-deductible donations. The Rotary Australia Compassionate Grants Projects within RABS uses matching funds from donations, such as those provided by Dick Smith's Trust, to assist Australians facing hardship.
3. **Rotary Australia Relief Fund (RARF):** This fund is dedicated to responding to national appeals and efficiently disbursing funds to appropriate aid projects. RARF's focus is on mobilising rapid support during national crises, such as natural disasters, providing a structured channel for public generosity to be transformed into effective aid. This fund acts as a hub for contributions from both Rotary and non-Rotary sources, ensuring swift and effective aid delivery to disaster-affected areas.

### 1.2 *Purpose*

1.2.1 RAWCS does not tolerate sexual exploitation, abuse or harassment of any kind. This applies to our own organisation and extends to those we work with. This policy focuses on preventing and addressing sexual exploitation, abuse and harassment involving adults. We believe all adults have the equal right to protection regardless of any personal characteristic, including their age, gender, ability, culture, racial origin, religious belief and sexual identity.

1.2.2 The purpose of this policy is to:

- outline our commitment and approach to the prevention of sexual exploitation, abuse and harassment and how we address concerns if they arise;
- provide clear guidance to all our people and partners, on our commitments and expectations relating to preventing and addressing sexual exploitation, abuse and harassment, including expectations of behaviour and obligations to report concerns;
- ensure we meet our legal obligations in Australia and overseas in respect to preventing and addressing sexual exploitation, abuse and harassment;
- ensure we meet and align with good practice in the aid and development sector.

### 1.3 *Scope and Governance*

1.3.1 This policy applies to RAWCS and all of its administered funds and subsidiaries – referred inclusively within this policy as RAWCS.

1.3.2 This policy applies to all persons working for us or on our behalf in any capacity and at all times, including when representing RAWCS either within Australia or overseas.

- 1.3.3 This policy applies to all RAWCS staff, volunteers, Board members, committee members, suppliers and contractors. Within this policy all of these are represented by the term: “**our people**”.
- 1.3.4 This policy and its obligations extends to any persons who visit our premises, programs or activities within Australia and overseas.
- 1.3.5 RAWCS program partners are required to adhere to this policy through demonstrated alignment within their own policies and procedures. Program partners are responsible for ensuring their downstream partners also follow appropriate policies and procedures.

## 1.4 Policy References

### 1.4.1 International Prevention of Sexual Exploitation, Abuse and Harassment Instruments (endorsed/signed by the Australian Government):

- Joint Statement and 22 Commitments
- Tidewater Joint Statement on Combatting Sexual Exploitation and Abuse in Development and Humanitarian Sectors
- Whistler Declaration on Protection from Sexual Exploitation and Abuse in International Assistance

### 1.4.2 External policies, procedures, documents and standards:

- Australian Council for International Development (ACFID) Code of Conduct
- Department of Foreign Affairs and Trade (DFAT) Prevention of Sexual Exploitation, Abuse and Harassment Policy
- Australian Charities and Not-For-Profits Commission (ACNC) External Conduct Standards

### 1.4.3 RAWCS governance documents:

- RAWCS Code of Conduct
- RAWCS Child Safeguarding Policy and Code of Conduct
- RAWCS Commitment to Human Rights, Humanitarian Principles and Racial Justice Statement
- RAWCS Gender Equity Policy
- RAWCS Complaints Policy and Procedure
- RAWCS Whistleblower Protection Policy
- RAWCS Privacy Policy
- RAWCS Program Operations Manuals

## 1.5 Definitions

Term	Definition
<b>Sexual exploitation</b>	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.
<b>Sexual abuse</b>	The threatened or actual physical intrusion of a sexual or sexualised nature, including inappropriate touching, by force or under unequal or coercive conditions, sexual assault and rape. It may also include threatened or actual nonphysical intrusion (unwanted and/or uninvited exposure to pornography, texts, images, and so on, the sharing of images, texts and so on, demands for sexualised photographs etc.).

<b>Sexual harassment</b>	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.
<b>Transactional sex</b>	The exchange of money, employment, goods or services for sex, including sexual favours.
<b>Fraternisation</b>	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.
<b>Victim/Survivor</b>	A person who is, or has been, sexually exploited, harassed or abused.
<b>Perpetrator</b>	A person (or group of persons) who commits an act of or other type of crime or offence.

## 2. Principles

### 2.1 Guiding Principles

- 2.1.1 The Policy is underpinned by the six principles outlined below. The principles reflect Australia's international commitments to prevent and address sexual exploitation, abuse and harassment.
- 2.1.2 **Zero tolerance of inaction:** Sexual exploitation, abuse and harassment are never acceptable. We recognise that achieving a significant reduction in sexual exploitation, abuse and harassment is a long-term endeavour. We acknowledge that the reporting of incidents may increase as a result of a growing awareness, changing attitudes and more effective reporting mechanisms being in place. For this policy, we define zero tolerance as acting on every allegation in a fair and reasonable way with due regard for procedural fairness.
- 2.1.3 **Strong leadership accelerates culture change:** We recognise that strong leadership is essential to driving change, setting organisational culture, clear expectations and modelling respectful behaviour. Strong leadership supports communities, victims/survivors and whistle-blowers to feel safe, report concerns and be assured that their allegations will be taken seriously. Our leaders are committed to preventing sexual exploitation, abuse and harassment and are demonstrating this by taking action, including:
- Improving diversity and inclusion.
  - Embedding gender equality in human resource procedures.
  - Having a dedicated Safeguarding Focal Point within the leadership team.
  - Including standing agenda item for National Board of Directors' meetings on safeguarding.

- 2.1.4 **Preventing sexual exploitation, abuse and harassment is a shared responsibility:** We acknowledge that preventing and addressing sexual exploitation, abuse and harassment is a shared responsibility by all our people and should be embedded throughout all our activities and organisational practices. We will encourage and work with partners and communities to build their knowledge, understanding and responses to sexual exploitation, abuse and harassment based on their cultural, social and local contexts.
- 2.1.5 **Victim/survivor needs are prioritised:** We are committed to ensuring procedural fairness to all parties and ensuring their rights are respected. We commit to ensuring all our work is underpinned by a “do no harm” approach. We especially recognise the vulnerabilities and the needs of those who may be victim/survivors. Therefore, our approach aims to:
- Treat the victim/survivor with dignity and respect
  - Actively involve the victim/survivor in decision making
  - Provide the victim/survivor with comprehensive information
  - Protect privacy and confidentiality
  - Not discriminate based on race, ethnicity, gender, sexual orientation, socio-economic status, age, physical abilities, religious beliefs, political beliefs, or other ideologies and
  - Consider the need for counselling and health services to assist the victim/survivor with their recovery.
- 2.1.6 **Gender inequality and other power imbalances are addressed:** Available data indicates that while the majority of victims/survivors of sexual exploitation, abuse and harassment are female and the majority of perpetrators are male, other power imbalances exist in addition to gender. These inequalities can be based on the distinctions of:
- Worker/participant
  - Ability/person with a disability
  - Ethnic and Indigenous backgrounds
  - Religion
  - Gender identity
  - Sexual orientation
  - Age
  - Health and poverty
- 2.1.7 **Stronger reporting will enhance accountability and transparency:** We hold ourselves accountable to the people we serve including program participants, communities, our partners as well as our donors and the Australian community. We are committed to accountability and transparency through appropriate, accessible and safe reporting mechanisms. We also support our partners to do the same. Stronger reporting allows us to better monitor sexual exploitation, abuse and harassment, understand risks, improve systems and safeguards accordingly

## 3. Policy Commitments

### 3.1 Professional Behaviour Standards

- 3.1.1 The following list of expected behaviours applies to all of our people in both their personal and professional lives:
- maintain a duty to act at all times in a manner which upholds the values and reputation of RAWCS;
  - undertake to create and maintain a safe and trusted environment that promotes the implementation of this policy and safeguards everyone from sexual exploitation, abuse and harassment;

- comply with all relevant Australian and local laws of the country to which he or she is placed, or in which he or she is travelling;
- be aware that sexual behaviour is an area of particular sensitivity, where conduct may more easily be seen as offensive or be misinterpreted;
- ensure personal conduct towards a colleague is not exploitative or such that it reasonably leads to a perception of exploitation;
- abide by the expected behaviours outlined in the RAWCS Code of Conduct;
- immediately report to RAWCS any concern, suspicion or allegation of or breach of the RAWCS Prevention of Sexual Exploitation, Abuse and Harassment Policy.

3.1.2 In addition, our people must not engage in sexual relationships with program participants as these relationships are based on inherently unequal power dynamics and there is the potential for abuse of power. Such relationships undermine the credibility and integrity of RAWCS and its programs. You must immediately inform their direct manager/supervisor if you become engaged in a personal relationship which may be perceived as inappropriate or exploitative, or where real or perceived unequal power dynamics exist. If you are unsure if a relationship falls into this category should discuss the situation with your line manager/supervisor.

### **3.2 *Safe Programming and Active Risk Management***

3.2.1 We are committed to ensuring no harm and promoting the safety and dignity of program and project participants during the delivery of our programs and activities. We uphold this commitment in person and through technology and electronic media.

3.2.2 We actively manage the risk of harm in the course of our work and encourage and support partners to do the same in delivering aid and development projects by:

- Conducting thorough risk assessments that include the risk of sexual exploitation, abuse and harassment of all our programs and activities to identify risks and develop mitigation strategies to reduce and manage the risk of sexual exploitation, abuse and harassment.
- Conducting partner checks to ensure policies and procedures are in place and identify safeguarding capacity building activities to support partners and program delivery.
- Monitoring risks to ensure assessment-identified risks are reviewed, emerging risks are incorporated and that mitigation strategies put in place are being implemented and are effective through the program/project cycle.
- Ensuring that partners and projects have strong feedback and complaints mechanisms so that any concerns can be reported and acted upon.

3.2.3 We acknowledge that during humanitarian emergencies, there is a higher level of risk for sexual exploitation, abuse and harassment to occur, and we manage these risks appropriately.

### **3.3 *Recruitment and Employment Practices***

3.3.1 Working with Children Checks (WWCC) are required from all our people where the work to be undertaken may involve contact with children, and additional screening measures may be required for people undertaking work that specifically involves working with children.

3.3.2 We include relevant clauses regarding prevention of sexual exploitation, abuse and harassment in our employment and volunteer engagement contracts, including that people can be suspended or transferred to other duties if they are under investigation or dismissed if it is found that they have breached this Policy and/or the RAWCS Code of Conduct.

3.3.3 We ensure all our people undergo induction and training on safeguarding including prevention of sexual exploitation, abuse and harassment and subsequently receive ongoing refresher training.

### **3.4 Responsibilities to prevent and respond to sexual exploitation, abuse and harassment**

3.4.1 All our people are responsible for championing good practice and maintaining an organisational culture that prioritises safeguarding against sexual exploitation, abuse and harassment.

3.4.2 Volunteer team leaders, supervisors and managers at all levels have particular responsibilities to support and develop systems that maintain an environment that facilitates implementation of this Policy and which prevents sexual exploitation, abuse and harassment. They must ensure that our people and program participants understand and comply with this Policy.

3.4.3 Volunteer team leaders, supervisors and managers must create a safe environment at RAWCS for anyone to come forward and raise allegations or concerns of sexual exploitation, abuse and harassment and take action to immediately respond to any reports.

## **4. Reporting and Investigation**

### **4.1 Reporting Procedures**

4.1.1 We provide a safe, supportive and secure environment to report sexual exploitation, abuse and harassment. We will take all concerns seriously and respond immediately. All reports of sexual exploitation, abuse and harassment will be recorded, regardless of whether substantiated or full investigation required. The principles of natural justice will apply to all investigations.

4.1.2 Our people must immediately report any concerns, suspicions or allegations of sexual exploitation, abuse and harassment or breach of this policy. A report should be made to one of the following people as applicable:

- the relevant Volunteer Team Leader – On Site Management: if he/she feels comfortable doing so, and if the Volunteer Team Leader is not directly or indirectly implicated in the alleged report;
- National Manager Projects & Volunteers;
- Safeguarding Focal Point;
- Chief Executive Officer

4.1.3 A person reporting a case of sexual exploitation, abuse and/or harassment, in good faith, or any person who has cooperated with an investigation into a report of sexual exploitation, abuse and harassment will be protected by this policy. Malicious reporting of sexual exploitation, abuse and harassment with the intention of harming another person's integrity or reputation amounts to misconduct and is subject to disciplinary action. This is distinct from reports made in good faith based on the judgment and information available at the time of the report, which may not be confirmed by an investigation.

4.1.4 A Sexual Exploitation, Abuse and Harassment Incident Reporting Form is at [Appendix 1](#).

4.1.5 The Safeguarding Focal Point is responsible for taking prompt and appropriate action in relation to sexual exploitation, abuse and harassment reports including determining the most appropriate investigation process which may involve external legal, mediation or expert advice as required.



## **4.2 Investigations**

- 4.2.1 Investigations of sexual exploitation, abuse and harassment will be carried out in a manner that is timely, fair, objective and as far as is practicable, confidential. This includes the use of appropriate interviewing practice with complainants and witnesses.
- 4.2.2 All information and documented evidence will be held securely and in the strictest confidence as far as is appropriate. The name of the complainant will not be revealed to the person(s) potentially implicated in the allegation or to any other person unless the individual personally authorises the disclosure of their identity. This may become a requirement in subsequent investigative processes.
- 4.2.3 Sensitive information related to reports of sexual exploitation, abuse and/or harassment whether involving our people or others in the communities in which we work shall be shared only with Australian or local law enforcement authorities, when a notification to police or appropriate authorities must be made or on a 'need to know' basis.
- 4.2.4 In line with our Complaints Handling Policy and Procedure and Whistleblower Policy, and to support and enable reporting and effective response to reports, we will maintain appropriate, accessible and safe procedures and mechanisms for reporting of concerns, suspicions or allegations of incidents of sexual exploitation, abuse and harassment, and/or breaches of this Policy or the Code of Conduct.
- 4.2.5 When working with our partners we will ensure that partners, communities and people we work with are proactively informed about our commitments to the prevention and addressing of sexual exploitation, abuse and harassment and reporting procedures in place for raising any concerns relating to sexual exploitation, abuse and harassment.
- 4.2.6 Where safe to do so, and when in accordance to the wishes of the victims, survivors and whistleblowers, all alleged incidents of sexual exploitation, abuse and harassment that involve a criminal aspect should be reported through the correct local law enforcement channels regardless if it is mandated or not.

## **4.3 Survivor support and assistance**

- 4.3.1 We will adopt a survivor-centred approach in preventing and responding to sexual exploitation, abuse and harassment. We will ensure that all responses are developed in a manner that balances respect for due process with a survivor-centred approach in which the survivor's wishes, safety and wellbeing remain a priority in all matters and procedures. Furthermore, all actions taken should be guided by respect for choices, wishes, rights and dignity of the survivor.
- 4.3.2 We will ensure survivors of sexual exploitation, abuse and harassment are offered support and assistance such as referral to safe health/medical, psychosocial and legal/justice response where appropriate and where required to specialised children's or women's services.
- 4.3.3 Survivors will be provided with information on the progression of an investigation and final outcomes.

## 5. Roles and Responsibilities

Roles	Responsibilities
<b>National Board of Directors</b>	<ul style="list-style-type: none"> <li>Promote a culture does not tolerate sexual exploitation, abuse or harassment of any kind.</li> <li>Approving this policy and holding the Chief Executive Officer (CEO) accountable to how effectively this policy is implemented.</li> </ul>
<b>CEO</b>	<ul style="list-style-type: none"> <li>Fostering an organisational culture that embodies safeguarding including the prevention of sexual exploitation, abuse or harassment of any kind.</li> <li>Ensuring this this policy is communicated to our people and this policy is upheld.</li> <li>Ensuring all our people are accountable to this policy.</li> </ul>
<b>Safeguarding Focal Point</b>	<ul style="list-style-type: none"> <li>Ensuring that we meet our obligations to Safeguarding (Child Protection and Preventing Sexual Exploitation, Abuse and Harassment).</li> <li>Implementing policies and procedures</li> <li>Receiving and managing reports and investigations</li> <li>Reporting to the Board and other stakeholders</li> <li>Ensuring this policy is accessible via our website</li> </ul>
<b>National Manager Projects &amp; Volunteers</b>	<ul style="list-style-type: none"> <li>Ensuring all project participants are aware of, and comply with our obligations to Safeguarding (Child Protection and Preventing Sexual Exploitation, Abuse and Harassment).</li> <li>Fostering a culture of integrity by actively promoting and supporting whistleblowing channels to report unethical behaviour or policy violations.</li> </ul>
<b>Volunteer Team Leader</b>	<ul style="list-style-type: none"> <li>Ensuring all project participants are aware of, and comply with our obligations to Safeguarding (Child Protection and Preventing Sexual Exploitation, Abuse and Harassment).</li> <li>Fostering a culture of integrity by actively promoting and supporting whistleblowing channels to report unethical behaviour or policy violations.</li> </ul>
<b>All Our People</b>	<ul style="list-style-type: none"> <li>Ensuring that your actions are in line with this policy, and that your work reflects the Guiding Principles and Policy Commitments above.</li> <li>Not encouraging others (directly or indirectly) to breach this policy.</li> <li>Reporting any breach to your manager/supervisor.</li> </ul>

## 6. Policy Distribution

- 6.1 This policy will be available on our website and disseminated to all our people, visitors and partners.
- 6.2 We will ensure that all our people, visitors and partners are notified of and made aware that they are required to comply with the policy.

## 7. Review

- 7.1. We are committed to continuous improvement to our policy, procedures and practices. This policy will be reviewed at least every three years by the CEO and approved by the National Board of Directors to ensure it is working in practice and updated to accommodate changes in legislation or circumstance.
- 7.2. Feedback on this and other safeguarding policies is openly encouraged from our people, partners, stakeholders and the communities we work with. Feedback, as well as emerging good practice and collaborative lessons learnt across the development sector, will be used to strengthen this and related policies and procedures.

## 8. More information

- 8.1. If you have a query about this policy or need more information, you can contact us via:
- email: [info@rawcs.org.au](mailto:info@rawcs.org.au)
  - phone: +61 2 8833 8306
  - post: Rotary Australia World Community Service Ltd  
25/1 Maitland Place  
Maitland Place  
Norwest NSW 2153  
Australia

<b>Name</b>	<b>RAWCS Prevention of Sexual Exploitation, Abuse &amp; Harassment Policy</b>
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### *Document Revision History*

<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Description</b>

## Appendix 1: Incident Reporting Form

### Safeguarding Reporting Form

#### Notification Details

In line with our Prevention of Sexual Exploitation, Abuse and Harassment Policy principles, RAWCS takes a victim/survivor centred approach to the reporting of safeguarding issues. Where it is safe to do so, please provide as much information as possible, and in line with the wishes of the victim/survivor.

If you do not know any answers to the questions below, please write do not know. You do not need to seek further information to submit the form.

If you have any concerns about completing this form please contact: [complaints@rawcs.org.au](mailto:complaints@rawcs.org.au)

#### All Information in this form will be treated confidentially

Our people, representatives and partners must report any behaviour that is suspected of causing harm and any instances of policy non-compliance.

You can lodge this form at email: [complaints@rawcs.org.au](mailto:complaints@rawcs.org.au)

#### 1. Information about the person completing this form

*Note, please consider the privacy and protection of any individuals reporting. Only provide details of any individuals if permission has been granted to share this information.*

Name	
Organisation	
Position or relationship to RAWCS	
Telephone	
Email	
Date	
Location (country/province/city etc)	

**2. Information about the victim/survivor** If more than one person was affected, please include all.

*Note, please consider the privacy and protection of any individuals reporting. Only provide details of any individuals if permission has been granted to share this information.*

Name	
Age	
Gender	
Current location of the victim/survivor <i>(include who the person lives with if applicable)</i>	
Any additional information about the victim/survivor, such as injuries, disability, general impressions.	
What actions have been taken to ensure the victim/survivor's safety at present?	
Have referrals been made to support services such as a medical facility or counselling services? <i>(if yes, please provide details)</i>	
Location <i>(country/province/city etc)</i>	
Does the victim/survivor know that you are reporting this concern?	

<b>3. Information on the suspected concern</b>	
What Happened?	
When did it take place? <i>(date(s) and time(s))</i>	
Where did it take place? <i>(country, province, city/village/town etc. Please provide as much detail as possible)</i>	
Were there witnesses? <i>If yes – who are they and how can they be contacted?</i>	
Date incident report was received by you?	
<b>4. Project/program details related to the incident</b>	
In which Project or Program?	
Location of Project or Program <i>(country, province, city/village/town etc. Please provide as much detail as possible)</i>	
Name of partner(s) associated with the project/program: <i>(e.g. name of organisation(s); include downstream partners)</i>	
<b>5. Reporting to others</b>	
Are local police aware of the incident/allegation? <i>If yes, please provide details</i>	
Who else has been informed about this Safeguarding Concern <i>(include both internal and external e.g. police / doctors)</i>	
<b>6. If applicable: Information about the suspected perpetrator/person(s) involved <i>(If safe to do so)</i></b>	
Name	

Gender	
Suspected perpetrators relationship to victim/survivor	
Suspected perpetrators relationship to Caritas Australia	
Is the suspected perpetrator Australian or living in Australia?	
Current Location	
Contact details	
<b>7. Other information</b>	
<i>Please provide any other relevant information here that has not already been mentioned above</i>	