



PROJECT ROZANA
פרויקט רוזנה مشروع روزانا

PREVENTION OF SEXUAL EXPLOITATION, ABUSE & HARASSMENT POLICY & PROCEDURES

VERSION	1
PERSON RESPONSIBLE	Executive Director
DATE OF BOARD SIGN OFF	27 April 2021
LAST UPDATED	21 April 2021
SCHEDULED REVIEW DATE	21 April 2024

POLICY AMENDMENTS

This is a working document and subject to amendment. This Policy will be available in English, Hebrew and Arabic.

Any suggestions about this Policy should be directed to the Project Rozana Australia Executive Director so changes can be considered. Any amendments or changes to the Policy will be submitted to the Board for endorsement.

The Executive Director is responsible for maintaining this document, including updating confirmed changes, informing staff of the changes, and disseminating the latest version across the organisation.

Any changes or amendments involve the following steps:

- Updating the Document Version table on the first page;
- Updating the relevant provision in this manual;
- Replacing the updated version of the manual e.g., shared drives, Intranet;
- Printing a hard copy of the updated manual for the office;
- Communicating the changes to all staff; and
- Archiving the old version of manual.

Table of Contents

POLICY AMENDMENTS.....	2
1. PREAMBLE.....	4
2. INTRODUCTION.....	4
3. SCOPE & PURPOSE.....	5
4. DEFINITIONS.....	6
5. POLICY PRINCIPLES.....	8
Principle 1: Zero tolerance of inaction of incidents of SEAH	8
Principle 2: Shared responsibility.....	8
Principle 3: Victim/survivor centred approach.....	8
Principle 4: Gender inequality and other power imbalances are addressed	8
Principle 5: Accountability and transparency	9
6. POLICY OBJECTIVES.....	9
7 PROCEDURES.....	10
7.1 Risk assessment	10
8. ROLES AND RESPONSIBILITIES	10
9. REPORTING.....	11
10. SEAH COMPLAINT HANDLING PROCEDURE	13
11. INTERVENTIONS.....	14
11.1 Self-help and supported self-help.....	14
11.2 Informal intervention	14
11.3 Mediation	15
11.4 Formal intervention	15
12. OUTCOMES	15
APPENDIX A: PROJECT ROZANA SEXUAL EXPLOITATION, ABUSE AND HARASSMENT (SEAH) INCIDENT NOTIFICATION FORM.....	17
APPENDIX B: PSEAH MINIMUM STANDARDS	22

1. PREAMBLE

This policy was written by Project Rozana in Australia. It may be used as a template across all Project Rozana offices. Project Rozana operates five offices registered in each of Australia, USA, Canada, UK and Israel, which are part of the Project Rozana Global Alliance. In this policy, 'Chair' means Chair of Project Rozana International. Unless specified otherwise the 'Board' refers to the board of Project Rozana Australia.

2. INTRODUCTION

Project Rozana's Mission is to build bridges to better understanding between Israelis and Palestinians through health. This community-wide, multi-faith health initiative achieves this by raising funds to: Train Palestinian health professionals in Israeli hospitals in order for them to return and build the health capacities of their communities, particularly where there are identified gaps; Transport Palestinian patients from home to checkpoints in Gaza and the West Bank to hospitals in Israel and back home via our partner NGOs, and Treat critically ill Palestinian children in Israeli hospitals in cases where funding from the Palestinian Authority is not available.

Project Rozana works with partner organisations in the region. Our work is supported by private philanthropy, Trusts and Foundations. In the capacity that we serve, we are equipped with resources and services which we bring to the community for their relief and development. This power differential and subsequent vulnerabilities in the communities in which we serve increases the risk of exploitation, abuse and harassment. As a humanitarian organisation, our primary concern is that the programs we instigate should "Do no harm".

Furthermore, we are committed to the [ACFID Code of Conduct](#) along with other key sector standards and regulations. In addition to the imbalance of power between workers and beneficiaries, we also acknowledge the imbalance in power between men and women, ability and disability, ethnicity, religion, gender identity and sexual orientation, age, health and poverty.

Project Rozana is committed to preventing sexual exploitation, abuse and harassment (defined below) by our Project Rozana representatives and implementing partners. As Project Rozana is committed to non-discriminatory and respectful behaviour, all forms of misconduct are considered unacceptable.

Project Rozana has zero tolerance towards the sexual exploitation, abuse and harassment of personnel or the adults who engage with our programs. Whilst this policy applies to all adults, it aims to particularly reflect Project Rozana's commitment to safeguarding vulnerable individuals. It is our responsibility to ensure that adults are not deliberately or unknowingly placed in situations which make them easily susceptible to Sexual Exploitation, Abuse and Harassment ("SEAH") by Project Rozana representative and implementing partners. Project Rozana is thus committed to

ensuring that safeguarding measures are embedded, accessible and clearly communicated to all Project Rozana representatives.

Our Child Protection Policy and Procedures are relevant to any matters relating to children.

Project Rozana has a commitment to operating within a survivor-centric approach and will respect the wishes and dignity of the survivor and consider the need for counselling. As an organisation we respect the privacy of people who may be impacted by this Policy and will endeavour to uphold confidentiality, unless a person is at risk of harm to themselves or others.

3. SCOPE & PURPOSE

This policy is applicable to all Project Rozana representatives. Our implementing partners, who have direct contact with the community and beneficiaries, are encouraged to implement this policy through development of their own policy.

This policy aims to develop an organisation wide culture of increased awareness of SEAH, with a scope that covers the workplace, partner organisations and the communities we seek to serve.

Project Rozana is committed to the following seven core principles on protection from sexual exploitation, abuse and harassment (“PSEAH”):

1. Sexual exploitation and abuse by Project Rozana representatives constitute acts of gross misconduct and substantiated allegations are grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of the majority or the locally recognised age of consent. Mistaken belief in the age of the child is not a defence.
3. Exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour by Project Rozana Representatives is prohibited. This includes the exchange of assistance that is due to program participation.
4. Sexual relationships between Project Rozana representatives/implementing partner staff and program participants, since they are based on inherently unequal power dynamics, undermine the credibility and integrity of the work of Project Rozana. For this reason, sexual relationships between Project Rozana representatives and program participants are prohibited and must be reported in accordance with Project Rozana's Child Protection Policy (in the case of minors) or as outlined below. Sexual relationships between implementing partner staff and program participants, are strongly discouraged. To protect against exploitation and abuse in cases where there is a sexual relationship between implementing partner staff and program participants, a conflict of interest must be declared.

5. When a Project Rozana representative has concerns or suspicions regarding SEAH by a fellow worker, whether in Project Rozana or a partner organisation/community, he or she must immediately report such concerns via the reporting mechanisms as outlined within this policy. As this applies to Project Rozana representatives who have concerns regarding alleged perpetrators of SEAH, in cases where a victim has a concern, they may control whether reports of incidents against them are reported.
6. Project Rozana representatives are obliged to create and maintain an environment that prevents SEAH and promotes the implementation of this Policy. Project Rozana managers at all levels have responsibilities to support and develop systems which maintain this environment.
7. Project Rozana Representatives are prohibited from engaging with commercial sex workers or engaging in prostitution of any form whilst on a work trip (including travel time, field visits and leisure time) and representing Project Rozana even if commercial sex work is legalised in that country. This kind of conduct goes against our organisational values as per the Project Rozana Code of Conduct and any such conduct, as substantiated, will constitute grounds for disciplinary measures including summary dismissal, under Project Rozana's relevant policies or discontinuation of partnership/funding under relevant MOUs and partnership/funding agreements.

4. DEFINITIONS

The DFAT Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy uses the following definitions of sexual exploitation, sexual abuse and sexual harassment, which Project Rozana adopts:

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 and personnel.

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

Child: A child is a person under the age of 18, irrespective of who is counted as child (based on age) in their local country.

Vulnerable adults: Vulnerable adults are people over the age of 18 who may be placed in a position of vulnerability and inability to care for themselves or protect themselves from any harm or exploitation. Individuals could be vulnerable to PSEAH due to their: gender, race, ethnicity, religious identity, mental or physical health, disability, sexual orientation, economic or social status, or being located in disaster or conflict prone regions.

Confidentiality: Refers to the protection of personal information. TAI will endeavour to upkeep confidentiality when dealing with concerns, issues and suspected cases, unless a person is at risk of harm to themselves or others.

Representatives: This term covers Project Rozana funded activities and includes the following:

1. Employees
2. Volunteers
3. Interns and work experience students
4. Board members
5. Individual contractors and consultants working for Project Rozana
6. Project Partners
7. Supporters of Project Rozana

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

Complainant: The person who raises the complaint. This may or may not be the alleged victim in the matter.

Victim: Once proven to be true or correct, the complainant who has alleged having been sexually exploited, abused or harassed can be referred to as the victim.

Subject: This is the person against whom the allegation of SEAH or Sexual harassment has been brought on by the complainant and is the focus of the investigation.

Perpetrator: This is a person who has been proven to have committed the SEAH.

5. POLICY PRINCIPLES

Principle 1: Zero tolerance of inaction of incidents of SEAH

Sexual exploitation, abuse and harassment are never acceptable. Project Rozana defines zero tolerance as acting on every allegation in a fair and reasonable way with due regard for procedural fairness. Reports of incidents may increase as organisations improve safeguards. Increasing reports may indicate growing awareness of SEAH and changing attitudes, with victims/survivors feeling more comfortable to report and organisations more likely to take action. The reporting of incidents and responses is an indicator that the risk of SEAH is being managed appropriately.

Principle 2: Shared responsibility

Preventing SEAH is everyone's responsibility. Project Rozana requires the commitment, support and investment of its Representatives and partners for this policy to be effective. All organisations have a responsibility to build their capacity to deal sensitively and effectively with SEAH that occurs in the course of their work.

Principle 3: Victim/survivor centred approach

Action to address SEAH should be underpinned by a “do no harm” approach prioritising the rights, needs, and wishes of the victim/survivor, while ensuring procedural fairness to all parties. This approach:

- treats the victim/survivor with dignity and respect
- involves the victim/survivor in decision making
- provides the victim/survivor with comprehensive information
- protects privacy and confidentiality
- does not discriminate based on gender, age, race/ethnicity, ability, sexual orientation, or other characteristics
- considers the need for counselling and health services to assist the victim/survivor with their recovery.

Principle 4: Gender inequality and other power imbalances are addressed

Additionally, gender inequality and other imbalances based on the distinctions of worker/beneficiary, ability/disability, ethnic and indigenous status, religion, gender identity and sexual orientation, age, health and poverty, can also result in SEAH. The intersection of gender with other forms of inequality can further increase the likelihood of SEAH occurring. Engagement with intended beneficiaries should be based on respect for diversity, promotion of gender equality and social inclusion, accountability, and a strong “do no harm” focus.

Although they are not in scope for this Policy, children are at high risk of SEAH — particularly children with disability, children living in residential or institutional care, children who have experienced previous trauma or abuse, and gender diverse children

and young people. Project Rozana's commitment to safeguarding children from SEAH is covered by Project Rozana's Child Protection Policy.

Principle 5: Accountability and transparency

Sexual exploitation, abuse and harassment is a failure of responsibility. Project Rozana is not only accountable to its donors, but also to the communities which it seeks to help. Stronger reporting allows Project Rozana to better monitor SEAH, understand risks, improve assurance and work with organisations to improve systems and safeguards accordingly.

6. POLICY OBJECTIVES

The objectives of this policy are to:

- Promote appropriate standards of conduct with respect to SEAH through consistent and intentional awareness raising and training
- Implement increased and ongoing capacity and awareness raising strategies to ensure that all Project Rozana representatives and implementing partner staff know their rights and responsibilities regarding PSEAH alongside other key policies (as per the Related Policies and Procedures section below) which must work in tandem with this.
- Create and maintain an environment which is free from workplace sexual harassment and promotes the implementation of relevant codes of conduct and behavioural standards.
- Prevent the SEAH of adults, including vulnerable adults, who interact/engage with Project Rozana representatives and/or implementing partner staff during the course of our work.
- Encourage the reporting of behaviours which breach this policy and related policies, notably the EEO, Anti-Discrimination, Harassment and Bullying, and Child Protection policies.
- Continuously socialise and train Project Rozana representatives on complaints handling and whistleblowing policies and procedures based on the principles of procedural fairness, ensuring all complaints are managed in a sensitive, fair, timely and confidential manner as appropriate.
- Ensure protection from any victimisation or reprisals for the complainant and the whistleblowers.

7 PROCEDURES

7.1 Risk assessment

This policy takes a risk-based, proportional approach to Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH). Project Rozana staff and partners must assess the level of risk for SEAH occurring and apply PSEAH Minimum Standards adopted from DFAT (Attachment A) commensurate with the level of risk identified. The higher the risk, the greater the controls required.

If no SEAH risk is identified in the delivery of Project Rozana business, then:

- no minimum standards need to be applied under this Policy; this should be documented in accordance with organisational risk management practices and be agreed by the relevant decision- maker
- the risk of SEAH should be monitored throughout activity delivery, as part of standard risk management practice.

If Project Rozana staff determines a risk of SEAH exists, the level of risk (low, medium, high or very high – see Appendix B for details) must be established based on the likelihood and consequence of that risk occurring as outlined in Project Rozana Risk Management Policy. Risk management processes should also be established to mitigate risks. To determine the risk of SEAH, a comprehensive assessment must be formed by considering the business/activity along with organisational and reputational risks and how they may intersect.

Using a risk-based approach, the DFAT PSEAH Minimum Standards are applied commensurate with the level of risk identified:

- Low Risk – apply Minimum Standards 1 and 2
- Medium Risk – apply Minimum Standards 1 - 3
- High Risk – apply Minimum Standards 1 -5
- Very High Risk – apply Minimum Standards 1 to 7

8. ROLES AND RESPONSIBILITIES

The Project Rozana Australia Executive Director is tasked with the responsibility of monitoring this policy and overseeing the implementation and regular updating of the policy across the Project Rozana organisation. This person is also the appointed Safeguarding Officer for Australia.

The Project Rozana Israel Office Project Manager is the appointed Safeguarding Officer for Israel and will be responsible for checking all prospective partners against the listed individuals and organisations and documenting this check.

The Project Rozana Australia Executive Director and the Israel Office Project Manager will ensure that all employees and volunteers uphold and operate in accordance with this policy. They are responsible for:

- Taking a lead role in raising awareness about the organisation's PSEAH measures including the Code of Conduct and provide training and advice to staff and volunteers on these measures
- Requiring applicants to disclose whether they have had a substantiated SEAH claim made against them in Australia or overseas in the Job Application Form or Consultant Agreement
- Work with project partners to ensure that staff and volunteers are integrating PSEAH measures into all Project Rozana related activities and that they are aware of reporting protocols
- Ensuring that primary stakeholders are aware of Project Rozana's PSEAH measures and their right to protection including how they would raise a concern about SEAH
- Receive reports in regards to SEAH, responding in accordance with Project Rozana's procedures and providing referral or next step advice
- Assist in investigating reported SEAH incidents, where appropriate
- Discuss subsequent action required, to ensure the safety and welfare of individuals in cases of SEAH caused by Project Rozana
- Access technical support in particular in regard to complex SEAH issues
- Coordinate regular reports to the Board in both countries and the International Board on the implementation of PSEAH measures.

9. REPORTING

Project Rozana Representatives are expected to comply with the principles and reporting requirements specified in this Policy. Reporting is for any suspected or alleged cases of SEAH perpetrated by anyone within scope of the Policy in connection with official duties or business.

Project Rozana will report any suspected or alleged incidents of SEAH or policy non-compliance to the Board of Directors. Wherever possible this should de-identify the victim/survivor, consistent with a survivor-centred approach.

Where safe to do so, and when in accordance with the wishes of the victims, survivors and whistleblowers, all alleged SEAH incidents that involve a criminal aspect should be reported through the correct local law enforcement channels. To protect the privacy of alleged perpetrators, victims/survivors, and whistleblowers, information provided to Project Rozana will be handled in accordance with the *Privacy Act 1988 (Cth)*.

If a Project Rozana Representative believes they have been subject to SEAH or if SEAH is believed or suspected to have occurred, there are rigorous procedures in place to ensure that any complaint or query is treated confidentially, taken as seriously as possible, and acted on promptly. In accordance with Principle 3 — Victim/survivor needs are prioritised — victims' and survivors' safety and wellbeing must be paramount to reporting and their information treated confidentially.

If in doubt, Project Rozana Representatives should report an alleged incident. In line with Principle 1 — Zero tolerance of inaction — individuals and organisations found not reporting alleged incidents will be viewed as being non-compliant.

In its offices in each country, a senior staff member is appointed as a PSEAH focal person or Safeguarding Officer. In the Project Rozana Australian Office, the Safeguarding Officer is the Executive Director. In the Israel Office it is the Project Manager. The Safeguarding Officer provides a key role in raising awareness throughout the organisation and in coordinating, supporting and advising on the development and implementation of the PSEAH policy and practices.

The responsibilities of Project Rozana Safeguarding Officers include:

- Promoting PSEAH policy widely within the organisation on a regular basis to ensure that all Project Rozana employees, volunteers, contractors and other Project Rozana representatives are aware of the policy and their rights and responsibilities and consequence of breaching the policy.
- Conducting regular training sessions on SEAH for Project Rozana employees, volunteers and project partners about recognising sexual harassment, what is, and what is not, sexual harassment, how to report concerns and how to use the complaint process.
- Incorporating the PSEAH policy into Project Rozana's HR Manual which also contains expected Code of Conduct and which is a component of an induction process of new staff, volunteers and contractors.
- Outline a commitment to developing materials that promote reporting mechanisms in languages and media that are appropriate and understandable to communities and contexts where your organisation is working.
- Working with Project Rozana partners to ensure their commitment to PSEAH and provide assistance with development and implementation of PSEAH policy.

To report alleged or suspected SEAH Project Rozana Representative can approach:

- The Safeguarding Officer
- Any member of the Project Rozana Board of Directors
- A trusted person, colleague or friend, who is willing to support them to raise a concern and/or test their perception of events.

Representatives should state they are using the Whistleblowing Policy and specify whether they wish for their identity to be kept confidential. People choosing to raise their concerns in writing must use the template Project Rozana Incident Report contained in Appendix A.

10. SEAH COMPLAINT HANDLING PROCEDURE

Once a SEAH incident report is received it gets forwarded to the Executive Director or, if the complaint is about the Executive Director to the Chair of the Board. The Executive Director or Chair responds to the author of the complaint thanking them for their concern and bringing it to Project Rozana's attention and informing them the matter will be investigated.

Reports of SEAH of individuals under the age of 18 will be handled according to procedures outlined in the Project Rozana Child Protection Policy.

Where a complaint does not involve the Executive Director, and the complaint is of a medium or high risk as specified by the Risk Rating Matrix in Project Rozana's Risk Management Policy, the Executive Director will inform the Project Rozana International Board and relevant in-country Board of the complaint.

The Executive Director will do an initial assessment to confirm it is a valid report and begin investigation. The Executive Director will keep the Project Rozana Boards updated on the progress of the investigation.

Once the Executive Director has finalised their investigation and report, the Boards and the informant will be updated. At this point, the Executive Director will hand everything over to the relevant Project Rozana Board for any subsequent action to take place.

Where the complaint is medium or high risk the Executive Director will inform the author and the Boards of the result of the investigation.

Project Rozana will ensure that if a complaint is made about SEAH:

- It is handled in accordance with the principles outlined in this policy
- As employer, Project Rozana meets its equal obligation to both the complainant and the respondent to uphold their rights and provide support
- Complaints are dealt with impartially, without bias and in a timely and sensitive manner
- Information about a complaint is only provided to those people who need to know in order for the complaint to be actioned properly
- The respondent is informed about any allegations made against them and is given the opportunity to respond to those allegations
- Those involved are informed about the process for resolving complaints

- Those involved are protected against any victimisation or reprisals and employees are assured that no action will be taken against them if they speak up
- There is a clearly defined review process to ensure the resolution is working satisfactorily and to confirm that no victimisation has resulted from the complaint
- Issues are resolved at the most appropriate level of intervention, subject to the rights of the complainant.

11. INTERVENTIONS

If an employee believes they have been exposed to SEAH, or has witnessed SEAH, trying to resolve issues at the lowest appropriate level of intervention may sometimes be the most effective and satisfactory way of dealing with unacceptable behaviour.

11.1 Self-help and supported self-help

Self-help involves an employee letting the respondent know that their behaviour is unwelcome, inappropriate or offensive and needs to stop. This may resolve the matter quickly and in a low-key manner. This may be appropriate where sexual harassment is minor, and the employee does not feel seriously harmed or threatened by approaching the person.

Self-help actions could be that the employee:

- Tells the person directly about the behaviour they do not like, and asks them to stop it
- Writes a letter on a 'private and confidential' basis to the person
- Takes a support person to tell the person that the behaviour needs to stop.

Employees should not approach someone directly about their behaviour if by doing so they would feel unsafe or threatened in any way.

Resolution may involve a verbal or written apology or agreement on how the parties will behave towards one another in future.

11.2 Informal intervention

Another informal way of dealing with sexual harassment and bullying is for an employee to ask for someone else to intervene on their behalf on an informal basis, either their manager or a colleague or friend.

The person who is intervening will:

- Discuss what happened and what is needed to resolve the situation
- Listen impartially
- Clarify the facts being reported
- Discover what appropriate action the employee is seeking

- Clarify the complaints procedure options and Project Rozana sexual harassment and bullying policy
- Discuss options with the employee and, if appropriate, the respondent and decide on an informal or formal approach
- Document the situation and outcome.

If there is agreement on what happened and what will resolve the situation, the issue can be resolved confidentially between the people concerned.

Mediation may be pursued to resolve complaints at this level.

1 1.3 Mediation

In some instances, arranging for a complainant and respondent to discuss the complaint with a skilled mediator may be an appropriate way to address the issue. Both parties need to agree to mediation.

Mediation is not always appropriate to resolve behaviour issues, particularly if there is a power imbalance. Mediation may be suitable where:

- There is basic agreement on the facts
- Both parties agree to try to resolve the situation through this method
- The harassment is of a low level and serious disciplinary consequences do not appear warranted.

If a complainant and the respondent cannot resolve the complaint through mediation, then formal options are available.

1 1.4 Formal intervention

The decision whether or not to proceed to a formal investigation will be made by the person receiving the complaint in consultation with Executive Director, or if the Executive Director is the initial recipient of the complaint, a member of the Project Rozana Board of Directors.

12. OUTCOMES

Where allegations are admitted or substantiated, the outcomes for the respondent of breaching this policy may range from an apology, counselling and training to warnings and dismissal. Disciplinary action will match the seriousness of the breach. Factors considered in determining the level of seriousness include the nature of the conduct and whether or not the person breaching the policy was in a position of trust or authority in relation to the complainant. Outcomes may also include interventions such as supportive counselling, a change in the work environment, or participation in mediation.

Where allegations are not substantiated it may still be appropriate to undertake some action, for example, refresher training or communications training. This ought not to single out or punish the respondent if there has been no finding.

13. RELATED POLICIES AND PROCEDURES

This Policy should be read in conjunction with the following:

- Child Protection Code of Conduct
- Child Safeguarding Policy
- Code of Conduct
- Gender Equity & Anti-Discrimination Policy
- Whistleblower Policy
- Feedback & Complaints Handling Policy
- Risk Management Framework
- Partnership Policy

APPENDIX A: PROJECT ROZANA SEXUAL EXPLOITATION, ABUSE AND HARASSMENT (SEAH) INCIDENT NOTIFICATION FORM



PROJECT ROZANA SEXUAL EXPLOITATION, ABUSE AND HARASSMENT (SEAH) INCIDENT NOTIFICATION FORM

What is this form for? In accordance with the Project Rozana Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy, all Project Rozana staff, partners and the staff and/or management of all institutions supported by Project Rozana must report alleged sexual exploitation, abuse and harassment (SEAH) incidents when they occur in the conduct of the development assistance work. This form is for organisations or individuals (including Project Rozana management and staff, as well as volunteers and Board members) to report an alleged incident to Project Rozana.

For more information, please see the Project Rozana PSEAH Policy available at www.projectrozana.org/about-us/policies/pseah

Please complete the form below and email to: confidential@projectrozana.org or call: +61 3 9272 5600. If you do not have email access, please telephone +61 3 9272 5600 to report a SEAH incident. If you require assistance in completing this form, please contact us by email or telephone.

It may not always be obvious if a SEAH incident relates to a Project Rozana -supported program or activity. If in doubt, please still report. Project Rozana takes a victim/survivor centred approach to the reporting of alleged SEAH incidents. Incidents should only be reported where it is safe to do so and where it is in line with the victim/survivor's wishes. Information that identifies individuals does not need to be reported.

Privacy Notification

This notice explains how Project Rozana will collect, use and disclose the personal and sensitive information collected through this form in accordance with our obligations under the Australian Privacy Principles (APP) and the Privacy Act 1988 (Commonwealth Privacy Act). Personal information may include an individual's name, signature, address, telephone number, date of birth and any commentary or opinion about Project Rozana: Sensitive information may include information about a person's health or racial/ethnic origin.

Project Rozana's collection, use and disclosure of information collected in this form:

Project Rozana reasonably believes that the collection, use or disclosure of the information, including personal information in this form is necessary in order for Project Rozana to:

- a) manage the risks of SEAH and SEAH incidents in the provision of development assistance;
- b) take appropriate action where it suspects that unlawful activity or misconduct of a serious nature has been or is being engaged in, and;
- c) lessen or prevent a serious threat to the life, health or safety of an individual or to public health or safety

If we are unable to collect your personal information, Project Rozana may not be able to contact you and to make further enquiries about the alleged incident you have reported.

Project Rozana Privacy Policy

Further information about how:

(a) you can access and seek correction of personal information that Project Rozana holds about you; and

(b) to make a complaint if you have a concern or believe Project Rozana may have breached an Australian Privacy Principle is available through the Project Rozana Privacy Policy: <https://www.projectrozana.org/about-us/policies/privacy-policy>

If anyone related to this notification is in imminent danger:

In Australia - please telephone 000 Outside Australia - please phone or visit your local law enforcement office (if safe to do so) or another support service (e.g., a medical centre, hospital, sexual violence support centre, rape support centre, etc).

SEAH Incident Notification Form

In completing this form, please provide as much information as you can or as you feel safe/comfortable to provide. In accord with our PSEAH Policy principles, Project Rozana takes a victim/survivor-centred approach to the reporting of SEAH.

1. Information about the person completing this form	
<i>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.</i>	
Name	
Organisation	
Position or relationship to Project Rozana	
Telephone	
Email	
Date	
Location (country, city)	
2. Information about the victim/survivor <i>If more than one person was affected, please include all.</i>	
<i>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.</i>	
Name	
Age	
Gender	
Current location of the victim/survivor (include who the person lives with if applicable)	
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? (if yes, please provide details)	
Location (country/province/city etc)	
Does the victim/survivor know that you are reporting this concern?	
3 Information on the suspected concern	

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?	
4 Project/program details related to the incident	
In which Project or Program?	
Location of Project or Program <i>(country/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>	
5. Reporting to others	
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>	
6 If applicable: Information about the suspected perpetrator/person(s) involved <i>If safe to do so</i>	
Name	
Gender	

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

Declaration:

By completing and submitting this form, I declare that:

- I have read, understood and agree to the collection, use and disclosure of my personal information in accordance with this incident notification form.
- I confirm that the victim/survivor is aware, and they have consented to me providing information on this incident, as outlined in this incident notification form.
- I confirm that if any whistleblowers have provided their details in this form, they have consented to do so.

If you do not consent or if you have any concerns about how the personal information collected in this form will be used, disclosed or shared, you should notify Project Rozana as soon as possible confidential@projectrozana.org or telephoning +61 3 9272 5600

Name _____

Signature _____

Date _____

APPENDIX B: PSEAH MINIMUM STANDARDS

The Policy takes a risk-based, proportional approach to PSEAH. Project Rozana’s staff and partners must assess the level of risk for SEAH occurring and apply minimum standards accordingly. The PSEAH Minimum Standards are then applied commensurate with the level of risk identified.

Minimum standard	Obligations for Organisations	Applies to			
		Low Risk	Med Risk	High Risk	Very High Risk
1. Have a PSEAH policy or other documented policies and procedures in place and clearly communicate expectations of this Policy.	Must have a PSEAH policy or other documented policies and procedures in place, which clearly meet the expectations of this Policy.	✓	✓	✓	✓
2. Have reporting and investigation procedures in place.	The PSEAH policy, or equivalent, documents how SEAH incidents will be managed, reported and investigated. Reporting and investigation processes must include engagement of and reporting to senior management and executive boards.	✓	✓	✓	✓
3. Have risk management processes that include the risk of SEAH.	Have effective risk management processes that include consideration of the risk of SEAH. The process must document the controls already in place or to be implemented to reduce or remove risks.	X	✓	✓	✓

Minimum standard	Obligations for Organisations	Applies to			
		Low Risk	Med Risk	High Risk	Very High Risk
4. Effective PSEAH training in place.	PSEAH training for personnel, including downstream partners and individuals that deliver DFAT business.	X	X	✓	✓
5. Recruitment and screening processes and employment practices address and manage the risk of SEAH.	Can demonstrate robust PSEAH recruitment and screening processes for all personnel/consultants including having in place appropriate and enforceable standards of conduct.	X	X	✓	✓
6. Prohibit transactional sex for all personnel, while engaged in the direct delivery of DFAT business	Prohibits transactional sex in the field for all staff and downstream partners while engaged in the delivery of Project Rozana business	X	X	X	✓