

PROTECTION FROM SEXUAL EXPLOITATION, ABUSE AND HARASSMENT (PSEAH) POLICY

March 2026

Trigger warning: This policy describes examples of sexual abuse and exploitation and may be distressing to read.

INTRODUCTION

Opportunity International Australia's (Opportunity's) mission is to provide innovative financial solutions, training, and support to equip people living in poverty to transform their lives, their children's futures, and their communities to build sustainable, resilient livelihoods that can transform their family's future. Its vision is a world in which all people can achieve a life free from poverty, with dignity and purpose. Opportunity respects and promotes the rights of all people to live free from discrimination and harassment.

PURPOSE

Opportunity is committed to promoting a culture where people are treated with dignity and respect, both in the workplace and in projects conducted by Opportunity and its implementing partner organisations. This policy outlines Opportunity's commitment to ensuring:

- effective mechanisms are in place to provide protection from sexual exploitation, abuse and harassment (PSEAH)
- these practices are integrated into our workplace and in the delivery of Opportunity's programs
- procedures are in place to raise concerns or allegations, and make complaints, and
- effective action is taken through a victim-survivor-centred approach when concerns are raised, or allegations are made.

The Policy relates to adults impacted by sexual exploitation, abuse and harassment (SEAH). Incidents of sexual abuse perpetrated against individuals under the age of 18 years must follow Opportunity's Child Protection Policy and relevant legal frameworks.

SCOPE OF POLICY

This policy applies to all activities carried out by Opportunity personnel while deployed by or otherwise conducting business for or representing Opportunity. The policy is applicable to all Opportunity personnel, including employees, Directors, volunteers, interns, Ambassadors, contractors and consultants in all locations (in Australia and overseas), and any individuals visiting Opportunity's programs overseas. Opportunity also cascades PSEAH requirements to downstream partners using a risk-based approach, as outlined under [Application to Implementing Partners](#).

BACKGROUND

Opportunity believes all people have a right to protection from sexual harassment, sexual abuse, sexual violence, bullying, exploitation and any abuse of power, regardless of age, gender, sexuality, disability, religion, or ethnic origin.

Sexual exploitation, abuse and harassment (SEAH) can take various forms and can happen to anybody at any time during their lives but are more likely when one person is in a position of power over another. Opportunity recognises that there are unequal power dynamics in the work it conducts, creating an inherent risk of people exploiting a position of power for personal gain. While women and children are particularly at risk of SEAH, all populations experiencing vulnerability, including men, people with disability, LGBTIQ+ individuals, and those from low income and minority background, are at risk.

If a person does not object to inappropriate behaviour at the time it happens, it does not mean that they are consenting to the behaviour. It may be difficult for a victim-survivor to object, especially if the perpetrator is in a position of authority.

POLICY PRINCIPLES

This policy is governed by the following principles:

- **Zero tolerance of inaction:** SEAH is never acceptable. We will act on every allegation in a fair and reasonable way considering procedural fairness and protecting victim-survivors and complainants from retaliation. We believe stronger reporting enhances accountability and transparency.
- **Responsibility of all:** Opportunity believes that safeguarding is the responsibility of all staff. Opportunity's Board, Executive team and people managers will lead by example and model respectful behaviour in their interactions at work to cultivate a strong safeguarding culture, where people feel safe to report and assured their allegations will be taken seriously.
- **Victim-survivor needs are prioritised:** Opportunity will prioritise the rights, safety, wellbeing and dignity of the victim-survivor whilst providing procedural fairness to all parties. This approach treats the victim-survivor with respect, considers their safety, involves them in decision making at their pace, protects their privacy and confidentiality other than where information must be shared by law or to support an investigation, provides comprehensive information and as much support as is reasonable considering the circumstances, and takes a victim-survivor-centric lens to avoid further traumatising or re-traumatising them.
- **Gender inequality and other power imbalances are addressed:** Opportunity is committed to ensuring that all people, regardless of disability, gender, sexual orientation, or socio-economic background, are afforded protection and support.
- **PSEAH approaches are tailored to the local context:** Opportunity is committed to working with its partners to ensure PSEAH approaches are reflective of local and cultural contexts and address the needs and voices of local people experiencing vulnerability.

- **Mandatory Reporting:** All PSEAH concerns must be reported to DFAT within 24 hours of the initial report. Reporting mechanisms will be clear, confidential, and accessible, with protections in place for those who raise concerns.

DEFINITIONS AND EXAMPLES

Opportunity provides definitions and examples of sexual exploitation, abuse and harassment and other instances of non-sexual gender-based violence to ensure a comprehensive approach to safeguarding. For the purposes of this policy, the following definitions apply:

Sexual exploitation – any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, threatening or profiting monetarily, socially or politically from the 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.

Examples of acts of sexual exploitation and abuse include:

- 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, or under the influence of drugs or alcohol. Force includes:
 - 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)
 - threats of physical aggression
 - emotional coercion
 - psychological blackmailing
- Forcing someone to have sex with anyone
- Forcing a person to engage in prostitution or pornography or videotaping or photographing sexual acts and posting it without permission
- Refusing to use safe sex practices
- Alleging or threatening to allege that anyone already has a history of prostitution
- Insisting on anything sexual that may be uncomfortable, frightening or hurtful
- Coercing someone into engaging in sexual activities in exchange for aid, services, employment opportunities, or other benefits
- Demanding sex in any context or telling someone that they or anyone else are obliged to have sex as a condition for anything

- **Human trafficking**, which is the acquisition and exploitation of people, through means such as force, fraud, coercion, or deception to obtain some type of labour or commercial sex act.

Sexual harassment – a continuum of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, that are or might be reasonably be perceived as offensive, humiliating or intimidating. 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

Examples of behaviour that could be considered sexual harassment include, but are not limited to:

- Staring or leering
- Unnecessary familiarity, such as unwelcome affection or touching
- Unwanted physical contact, sexual suggestions, or demands
- Making obscene or sexually suggestive remarks, insults or jokes that may cause offense
- Name-calling with sexual epithets
- Sending explicit or sexually suggestive emails or text messages
- Displaying posters magazines or screen savers of a sexual nature or accessing sexually explicit internet sites
- Requests for sex or repeated unwanted requests to go out on dates
- Intrusive enquiries into a worker's private life.

Gender-based violence (GBV) – an overarching term that refers to harmful acts directed at an individual or a group of individuals based on their gender. It is rooted in gender inequality, the abuse of power and harmful norms. The term is primarily used to underscore the fact that structural, gender-based power differentials place women and girls at risk for multiple forms of violence. While women and girls suffer disproportionately from GBV, men and boys can also be targeted. The term is also sometimes used to describe targeted violence against people with disability, LGBTQI+ populations, when referencing violence related to norms of masculinity/femininity and/or gender norms. This can include, but is not limited to, domestic violence, femicide, female genital mutilation, coercive control, and financial, emotional, physical, psychological and economic violence.

Victim-survivor – A term used to describe a person who is, or has been, sexually exploited, harassed or abused. 'Victim-survivor' acknowledges both the harm suffered

(victim) and the resilience or agency of the individual in coping with the aftermath (survivor).

Survivor-centric approach – A survivor-centric approach places the rights, wishes, needs, safety, dignity and well-being of the victim-survivor at the centre of all prevention and response measures concerning sexual exploitation, abuse and harassment.

Complainant-survivor – A term used in the context of reporting and complaints, because the person reporting may not be the victim-survivor.

PROHIBITION OF SEXUAL EXPLOITATION, ABUSE AND HARASSMENT (SEAH)

SEAH goes against the beliefs, values and mission of Opportunity. As such, the following activities are strictly prohibited during employment or engagement with Opportunity:

- any form of SEAH by Opportunity employees, volunteers, consultants, implementing partners or any representatives of the organisation associated with any work carried out by Opportunity, including the delivery of Opportunity's programs
- employees, volunteers and other representatives exchanging money, humanitarian assistance, gifts, preferential treatment, employment, goods or services for sexual services, including sexual favours or other forms of humiliating, degrading or exploitative behaviour or withholding services or selecting partners, communities or clients based on these demands or behaviours
- employees, volunteers and other representatives having sexual relationships with children (defined as anyone under the age of 18), as set out in Opportunity's Safeguarding Code of Conduct. Mistaken belief of age is not a defence.

RISK-BASED APPROACH

Opportunity takes a risk-based approach to the management of PSEAH in its business activities and has implemented policies, processes and procedures to manage SEAH risks, and ensure a safe workplace in line with its Positive Duty obligations under the *Sex Discrimination Act 1984*. These include:

1. A Protection from Sexual Exploitation, Abuse and Harassment Policy.
2. A Safeguarding Code of Conduct outlining acceptable and unacceptable standards of behaviour.
3. An accessible, confidential, and safe mechanism for reporting concerns or incidents.
4. Detailed and documented procedures for reporting and investigating SEAH incidents.
5. Safeguarding as a standing agenda item for Board and Executive Team meetings.
6. Assessment, monitoring and reporting of SEAH risks for business activities, programs and partnerships.

7. Compulsory PSEAH training for all staff, including scenario-based training to enhance staff awareness, capability and safety to identify incidents, report and respond
8. Recruitment processes and employment practices which mitigate the risk of SEAH (including reference checks and vetting candidates to reveal former misconduct)
9. Transactional sex is prohibited while engaged in the delivery of activities and programs, and while on work-related trips including incidental private travel.
10. PSEAH requirements in all contracts and agreements with downstream partners.

REPORTING SEAH CONCERNS OR INCIDENTS

Opportunity employees, volunteers and other representatives of the organisation must report, in line with this policy, any suspected, alleged or known SEAH incidents or inappropriate behaviour. 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.

Complaints regarding SEAH can be made by a person to whom Opportunity delivers services or who is affected by Opportunity's services, an implementing partner, an organisation we work with, employees, Directors, interns, volunteers, contractors or sub-contractors, supporters, or members of the public.

Opportunity has a comprehensive SEAH reporting and investigation process which details the processes and procedures to be used to raise SEAH concerns or report incidents relating to Opportunity's internal operations (whether in Australia or overseas) and how Opportunity will respond. This includes guidelines to report to Department of Foreign Affairs and Trade (DFAT) or other funders in line with Opportunity's reporting requirements. Refer to Appendix 1 for more information.

Opportunity's implementing partners are required to report any suspected or alleged instances of SEAH or policy non-compliance to Opportunity in the delivery of programs within 24 hours of becoming aware of an incident. The reporting and investigation process for partners is outlined in Appendix 2.

SAFEGUARDING FOCAL ROLES

Opportunity has appointed internal and programs/partner facing Safeguarding focal roles:

The Safeguarding focal roles are responsible for:

- acting as the reporting contact for Australian-based and internal SEAH complaints
- acting as the reporting contact for implementing partners to report incidents of SEAH in their organisations and supporting the development of their PSEAH practices

- understanding the DFAT and Australian Council for International Development (ACFID) requirements regarding SEAH and providing advice on policy development and implementation
- facilitating SEAH training for Opportunity staff
- ensuring practices and standards are current and implemented
- notifying DFAT or other funders in line with Opportunity's reporting requirements, and
- notifying relevant enforcement agencies as required.

SAFEGUARDING CODE OF CONDUCT

A Safeguarding Code of Conduct has been developed and must be signed by Opportunity employees, Directors, volunteers, interns, contractors and consultants in all locations and complied with during their engagement or employment with Opportunity. Participants on Opportunity's Insight Trips will also be required to sign and comply with the Safeguarding Code of Conduct.

TRAINING AND AWARENESS

Training on this policy is delivered to all Opportunity staff and volunteers at induction, and annual Safeguarding refresher training is provided as part of Opportunity's regular staff training program. A register is maintained to monitor the status of this training.

This PSEAH policy is published on Opportunity's website for the sake of transparency and to ensure it is accessible to all people we work with.

DISCIPLINARY ACTION

Breaches of this policy (including failure to carry out mandatory reporting), or the Safeguarding Code of Conduct may result in disciplinary action which could include, where appropriate, transfer to other duties, warning, counselling, suspension or dismissal.

APPLICATION TO IMPLEMENTING PARTNERS

Opportunity is committed to creating a safe culture for all those representing the organisation and engaged in implementing Opportunity's programs. Opportunity expects personnel to work and behave in a manner that respects and fosters the rights of the people they serve.

Opportunity works with its implementing partners to help them develop and implement policies and/or procedures for PSEAH, both in their workplaces and in the delivery of their activities. This includes a complaints-handling mechanism that allows all stakeholders to make complaints in a confidential and safe manner and ensures that all complaints are addressed.

Opportunity's relationship agreements with implementing partners clearly set out the expectations and requirements with respect to PSEAH, including mandatory reporting requirements if any of their personnel are accused of, charged with, arrested for, or

convicted of criminal offences relating to sexual exploitation, abuse or harassment, or in the case of any PSEAH policy non-compliance.

Opportunity works with implementing partners to build their capacity in PSEAH best-practices and ensure compliance with international safeguarding standards, including DFAT's PSEAH requirements. Non-compliance with these standards may lead to suspension or termination of funding arrangements and the relationship agreement for existing implementing partners. PSEAH policies and processes are mandatory criteria for establishment of new partnerships.

REVIEW OF POLICY

This policy will be reviewed every three years, or sooner if required. This policy is next due to be reviewed in 2028.

APPENDICES

1. SEAH reporting and investigation process for Opportunity's domestic and internal operations
2. SEAH reporting and investigation process for Opportunity's Programs and Partnerships
3. SEAH Incident Notification Form

APPENDIX 1: SEAH REPORTING AND INVESTIGATION PROCESS FOR OPPORTUNITY'S DOMESTIC AND INTERNAL OPERATIONS

MAKING A REPORT

Employees, volunteers and other representatives of the organisation have a responsibility to report, in line with this policy, any suspicions of inappropriate behaviour. Victim-survivors are not obligated to report incidents involving themselves, though reporting is encouraged if there is reasonable belief that not reporting an incident may risk harm to others.

Concerns or incidents relating to Opportunity's internal operations in Australia may involve organisations we work with, employees, interns, volunteers, contractors or sub-contractors, donors, or members of the public, occurring at any location where work is being conducted, including on-site at Opportunity's offices, off-site or after hours, at work-related activities including conferences, training sessions, insight trips and social functions. (Opportunity maintains a separate reporting process for implementing partners, a person to whom we deliver services or who is affected by Opportunity's services.).

The People and Culture Team (hereinafter referred to as 'Safeguarding Officer') are responsible for dealing with Australian-based and internal SEAH complaints and ensuring that an investigation is conducted in line with Opportunity's procedures.

The Safeguarding Officer can be contacted on 02 9270 3300 or at Safeguarding@opportunity.org.au.

Alternatively, if a disclosure is about a Director or the Safeguarding Officer, concerns can be reported directly to the Chair of Opportunity's Audit and Risk Committee, contactable at auditriskchair@opportunity.org.au.

In cases where the nature of the report is unclear, the Safeguarding Officer, will respectfully confirm whether the complainant-survivor is making their report under Opportunity's Grievance Policy, Complaints Policy or PSEAH Policy to ensure it is managed appropriately and in accordance with the complainant-survivors wishes.

ESCALATING THE REPORT

The Safeguarding Officer will record all reported incidents in Opportunity's internal Safeguarding Misconduct Register using de-identified information.

The Safeguarding Officer will notify the CEO and Company Secretary immediately that a report has been received. The CEO will notify the Chair of Opportunity's Board that an allegation has been received, and the Board must be informed at the earliest appropriate opportunity with details of the complaint and the proposed response.

The Safeguarding Officer will report to DFAT within 24 hours of any suspected or alleged SEAH incidents, using the DFAT SEAH Notification Form and email to seah.reports@dfat.gov.au (Refer to Appendix 3). Where there are fears for the safety of a victim-survivor, or where a victim-survivor has not consented to a report being made, the Safeguarding Officer will contact seah.reports@dfat.gov.au for advice.

If an incident is suspected of being a criminal offense, it will be reported to the local enforcement authorities unless it is at odds with the wishes or welfare of the victim-survivor, or it would pose a threat to the life or safety of another individual.

INVESTIGATION PROCESS

The Safeguarding Officer will conduct an investigation, ensuring procedural fairness and impartiality. If they decide it is not possible to resolve the complaint internally, they may refer it to external processes such as a mediation or a complaints handling body. In both cases, the complainant-survivor will be advised in writing of the process for investigating the complaint and the expected timeframe for resolution.

Throughout the investigation, the complainant-survivor, or individual to whom a complaint has been made, may have a support person present at meetings.

The Safeguarding Officer is to document the progress and result of the investigation in the Internal Safeguarding Misconduct Register using de-identified information and provide the CEO with regular updates.

Opportunity will not reveal a complainant-survivor's name or personal details to anyone outside the organisation without the complainant-survivor's permission, 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.

SUPPORT

Responding to the emotional, mental and physical wellbeing needs of the complainant-survivor(s) must be actioned at the same time any reporting or investigation is taking place. This should include checking-in on what support mechanisms are available to the complainant-survivor, referring the complainant-survivor to Opportunity's Employee Assistance Program, providing links to reputable support organisations, and asking what reasonable accommodations are needed for the complainant-survivor to feel comfortable and safe at work.

If a victim-survivor of sexual misconduct alleges the perpetrator was an employee or volunteer deployed by Opportunity, or otherwise conducting business for or representing Opportunity, we will consider, on a case-by-case basis, providing appropriate and effective forms of reparation, including but not limited to access to relevant assistance and support services such as medical, legal and psycho-social services.

DISCIPLINARY ACTIONS

Available sanctions include dismissal, suspension, warning, counsel or transfer to other duties for any employee who breaches this policy or Opportunity's Safeguarding Code of Conduct.

APPENDIX 2: SEAH REPORTING AND INVESTIGATION PROCESS FOR OPPORTUNITY'S PROGRAM AND PARTNERSHIPS

The Programs Safeguarding Officers are responsible for dealing with Partner and Program SEAH complaints, which includes any reports relating to implementing partners, individuals to whom we deliver services or anyone who is affected by Opportunity's services.

DFAT-funded partner organisations must report any suspected or alleged SEAH incidents to Opportunity's Programs Safeguarding Officers within 24 hours of becoming aware of the incident.

The Programs Safeguarding Officers can be contacted at:

programs-safeguarding@opportunity.org.au

Non-DFAT funded partners must also report alleged SEAH incidents to Opportunity's Program Safeguarding Officers as outlined above, after which Opportunity and the partner organisation will manage the incident directly.

The Programs Safeguarding Officer will:

- Record all reported incidents in the Safeguarding Misconduct Register using de-identified information.
- Inform the relevant member of the Executive, Company Secretary, and CEO immediately so they can notify the Opportunity Board.
- Report any suspected or alleged SEAH incidents involving DFAT funds to DFAT within 24 hours, using the DFAT SEAH Incident Notification Form and emailing seah.reports@dfat.gov.au.

The Programs Safeguarding Officers will continue to liaise with partner organisations and DFAT until the case is closed.

On an ongoing basis, and following any incident reports, the Programs Safeguarding Officers will work with partners to ensure appropriate and effective safeguarding mechanisms are in place.

APPENDIX 3: SEAH INCIDENT NOTIFICATION FORM

Details of Reporting Organisation or Individual (Note, please consider the privacy and protection of any individuals reporting SEAH)	
Name of Reporting Organisation/Individual	
Contact name & Position	
Telephone:	
Email:	
Location of Reporting Organisation/Individual: (country/province/city etc)	
Details of SEAH Incident	
Type of allegation: (please nominate one or more allegation types – definitions below)	☐ Sexual exploitation ☐ Sexual abuse ☐ Sexual harassment ☐ Policy non-compliance
Date(s) of alleged incident:	
Location of alleged incident: (Country, province, city/village/town etc. Please provide as much detail as possible)	
Date incident report was received by your organisation:	
Details of alleged incident: (Please provide details of the alleged incident. For example, the nature of the incident, the gender and position of the alleged perpetrator and victim-survivor, who the incident was reported to, and how the report was responded to. Include any specific vulnerabilities such as disability, female staff, client etc)	



What support has been/is being provided to the victim/survivor? (e.g. referral to a medical clinic, counselling services, etc)	
Have referrals been made to support services such as a medical facility or counselling services? (if yes, please provide details)	
What investigation, action or reporting has been undertaken? (please provide details e.g. an internal investigation will be conducted and a final report produced etc)	
What risk measures does your organisation already have in place? (e.g. PSEAH policy, Child Protection policy, mandatory training for staff on safeguarding, Safeguarding Code of Conduct, Complaint Policy, and Process, etc)	