

Policy Number: OS04
Policy Area: Organisational Standards and Integrity
Policy Title: Protection from Sexual Exploitation, Abuse and Harassment (PSEAH)



1. Overview

GMP is committed to protecting all people who meet GMP, its personnel, partners and programs from sexual exploitation, abuse and harassment (SEAH). GMP has zero tolerance for SEAH and zero tolerance for inaction, retaliation or cover-up. GMP will prevent and respond to SEAH through a survivor-centred, trauma-informed, rights-based and risk-based approach, consistent with the ACFID Code of Conduct Commitment 1.5 and DFAT Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) requirements.

2. Purpose

The purpose of this policy is to set out GMP's commitment and requirements for preventing, identifying, reporting and responding to SEAH. The policy establishes expectations for Board members, staff, volunteers, contractors, partners and other representatives; promotes a victim-survivor-centred and trauma-informed approach; supports safe, accessible and confidential reporting; and requires proportionate risk management, accountability and continuous improvement.

3. Scope

This policy applies to all GMP Board members, employees, volunteers, contractors, consultants, visitors, partners, downstream partners and any person representing or acting on behalf of GMP. It applies to conduct in Australia and overseas, during work or program activities, in communities, online and digital spaces, travel, accommodation, events and any context connected with GMP-supported activities. Where children are involved, GMP's child safeguarding requirements and relevant legal obligations must also be followed.

4. Responsibility

All personnel share responsibility for preventing SEAH and for upholding GMP's Code of Conduct. Leaders, Managers and the Board are responsible for setting a safeguarding culture, ensuring appropriate systems, resourcing prevention activities, supporting safe reporting, overseeing risk management and ensuring timely action. All personnel must sign

and comply with the GMP Code of Conduct (OS06), complete required safeguarding training, declare conflicts of interest, and immediately report any SEAH concern, suspicion, allegation or incident connected with GMP or GMP-supported activities.

GMP will appoint and maintain a named PSEAH focal person or designated safeguarding contact, and a backup contact, in the related procedure or implementation plan. The focal person will coordinate implementation of this policy, support awareness and training, maintain reporting pathways, advise on risk assessment and escalation, monitor implementation, maintain evidence of training and partner assurance, and support Board and management reporting.

5. Background

SEAH is a serious abuse of power and may constitute gender-based violence, criminal conduct, workplace misconduct, breach of contract and breach of safeguarding obligations. GMP recognises that unequal power relationships, discrimination, disability, age, gender inequality, poverty, displacement, dependency on aid, language barriers and social exclusion can increase risk and reduce access to reporting. GMP will embed safeguarding into organisational culture, programs, partnerships and decision-making, with a strong “do no harm” approach.

This policy is underpinned by the following principles: zero tolerance for SEAH and inaction; prioritising the rights, safety, dignity and wishes of victim-survivors; inclusion, equity and accessibility; prevention through leadership, culture and risk management; participation and accountability to communities; mandatory reporting of SEAH concerns; confidentiality and procedural fairness; and embedding safeguarding into governance, partnerships, program design and everyday practice.

6. Policy Statements

- a. GMP has zero tolerance for SEAH and for failure to take appropriate action. Any proven breach may result in disciplinary action, termination of employment or engagement, referral to statutory authorities, reporting to donors or regulators, and other contractual or governance action.
- b. Responses to SEAH will be victim-survivor-centred, trauma-informed, culturally safe, confidential and accessible. GMP will prioritise the safety, dignity, rights, needs and wishes of the person affected while also meeting mandatory reporting, legal and contractual obligations.

- c. GMP will proactively prevent SEAH through safeguarding risk assessments, safer recruitment and screening, induction, regular training, clear behavioural standards, supervision, partner due diligence, program design controls and monitoring proportionate to the level of risk.
- d. GMP will work with partners, networks and relevant agencies to strengthen safeguarding practice, share appropriate information in line with privacy and procedural fairness requirements, and minimise opportunities for perpetrators to move between organisations or gain access to vulnerable people.
- e. GMP will make this policy available to personnel, partners and relevant communities in appropriate formats and languages, and will promote safe, trusted and accessible reporting pathways, including options for people who may face barriers to reporting.
- f. All SEAH concerns, suspicions, allegations and incidents must be reported immediately through GMP's complaints and safeguarding reporting pathways. Where DFAT funding, DFAT business or a DFAT agreement is involved, GMP will notify DFAT of any suspected, alleged or known SEAH incident in accordance with DFAT requirements, including initial notification within 48 hours where required, using DFAT's required form, template or escalation pathway. Where safe, lawful and consistent with the wishes and safety of the victim-survivor, matters with a possible criminal aspect will be referred to appropriate authorities.
- g. GMP prohibits retaliation, intimidation, victimisation or adverse treatment against any person who reports a concern, participates in an investigation or supports a person affected by SEAH. Malicious or knowingly false reports may result in disciplinary action, but reports made in good faith will be protected even if not substantiated.
- h. GMP will review SEAH risks, incidents, complaints data, partner compliance and implementation of this policy at least annually, and will report material safeguarding risks and incidents to the Board for oversight and continuous improvement.
- i. GMP prohibits personnel and representatives from engaging in sexual exploitation, sexual abuse, sexual harassment, transactional sex, sexual relationships that involve abuse of position or vulnerability, grooming, coercion or any conduct that creates a sexually hostile, intimidating, unsafe or disrespectful environment.
- j. GMP will assess PSEAH risks for activities, locations, partners and downstream partners and apply controls proportionate to the level of risk,

including Essential or Comprehensive safeguards where required by DFAT funding, agreement terms or activity risk profile.

- k. GMP will ensure partner and downstream partner agreements include PSEAH obligations, including compliance with this policy or equivalent standards, incident notification, cooperation with investigations and assurance activities, safe recruitment and screening where relevant, community reporting pathways, and the right for GMP to take corrective or contractual action where safeguarding obligations are not met.

7. Responsibilities of Officers and their delegations, complaints pathways and focal point arrangements:

- a. Complaints or concerns may be made to the CEO and/or Policy Officer at complaints@gmp.org.au as per GMP's Complaint Handling policy and procedures or to the GMP Board Chair at chair@gmp.org.au if required.,
- b. The related procedure or implementation plan must list the current PSEAH focal person's position title, contact details, backup contact and responsibilities. Reports may also be made through any manager, Board member, partner focal point or trusted GMP representative, who must immediately escalate the matter through the complaints and safeguarding process.
- c. The GMP Board is responsible for oversight of this policy, ensuring appropriate action is taken where a complaint is upheld, monitoring implementation, ensuring resources and accountability for safeguarding, and receiving regular reporting on SEAH risks, incidents and compliance.
- d. The Chief Executive Officer is responsible for ensuring SEAH reports are triaged promptly, immediate safety and support needs are considered, support referral options are offered where appropriate, consent and confidentiality are considered, and DFAT, ACFID, legal, police, child protection, workplace health and safety, privacy and contractual reporting obligations are assessed. The Chief Executive Officer will ensure appropriate investigation, referral or management action is commenced and that communication with the complainant is managed in a survivor-centred, trauma-informed and procedurally fair manner.

8. Procedures and related forms

- a. OS02.1 Complaints Handling Process will be followed for any report of alleged, suspected or witnessed SEAH. The process must be accessible, confidential, culturally safe, timely and survivor-centred, and must operate alongside applicable child safeguarding, whistleblowing, human resources, donor, contractual, legal, police, workplace health and safety, privacy and regulatory requirements.
- b. The process will include immediate safety assessment, support and referral options for the person affected, informed consent where possible, confidential recordkeeping, assessment of mandatory reporting obligations, careful management where mandatory reporting may affect the wishes or safety of a victim-survivor, procedural fairness for all parties, timely investigation or referral by suitably skilled personnel, communication with the complainant where appropriate, and Board reporting and oversight.
- c. GMP will maintain confidential SEAH records, limit information sharing to those with a legitimate need to know, protect privacy, and ensure records are available for governance, assurance and donor reporting requirements where applicable.
- d. Where DFAT funding, DFAT business or a DFAT agreement is involved, GMP will notify and report SEAH allegations, incidents and related safeguarding concerns to DFAT in accordance with DFAT's required reporting timeframes, templates, escalation pathways and assurance requirements, including initial notification within 48 hours where required.
- e. GMP will communicate this policy and reporting pathways to personnel, partners and relevant communities, provide induction and refresher training appropriate to roles and risk, and monitor implementation through complaints data, incident learning, partner assurance, program review and annual Board reporting.
- f. GMP will maintain a community-facing complaints communication plan for relevant programs and partners. The plan will outline how reporting pathways are communicated in appropriate local languages and accessible formats, provide multiple safe reporting options, explain confidentiality and expected response steps, and identify options for people who may experience barriers to reporting.
- g. GMP will ensure activity, partner and downstream partner risk assessment tools identify SEAH risk factors, controls, responsible owners, monitoring arrangements and escalation thresholds, including whether DFAT Essential or Comprehensive Safeguards apply.

- h. GMP will ensure standard partner and downstream partner agreements include PSEAH clauses covering compliance with this policy or equivalent standards, reporting timeframes, cooperation with investigations, audit and assurance rights, corrective action, and flow-down obligations to downstream partners.
- i. GMP will retain evidence of PSEAH implementation, including induction, refresher training, partner briefings, risk assessments, incident learning, partner assurance, Board reporting and annual implementation review.

9. References (other policies, legislation or codes)

a. Related Policies

- i. OS06 GMP Code of Conduct
- ii. OS02 Complaints Handling Policy and OS02.1 Complaints Handling Process
- iii. OS05 Child Protection and Safeguarding Policy
- iv. HR12 Prevention of Harassment and Discrimination
- v. HR02 Grievance Policy
- vi. HR06 Work Health and Safety Policy
- vii. BG09 Privacy and Confidentiality Policy
- viii. P01 Partnership Management Policy (2025)
- ix. OS10 Risk Management Policy (2025)
- x. Relevant child safeguarding, whistleblowing, human resources, workplace health and safety, privacy, risk management, partner due diligence, complaints, disciplinary and recordkeeping policies and procedures

b. Related Documents

- i. [ACFID Code of Conduct Commitment 1.5](#)
- ii. [ACFID Guidelines for developing a Child Safeguarding Policy](#)
- iii. [DFAT Protection from Sexual Exploitation, Abuse and Harassment Policy](#)
- iv. [DFAT Child Protection Policy](#)
- v. [Sex Discrimination Act 1984](#)
- vi. [Fair Work Act 2009](#)
- vii. [Work Health and Safety Act 2011](#)

- viii. [Privacy Act 1988](#) and applicable state, territory and overseas legal requirements
- ix. Relevant donor agreements, partnership agreements, grant conditions and contractual safeguarding obligations

Definitions:

Term	Definition
Fraternisation	Any relationship involving, or appearing to involve, partiality, preferential treatment or improper use of rank, position, trust or power.
Perpetrator	A person who commits or is found to have committed SEAH or related misconduct.
PSEAH	Protection from sexual exploitation, abuse and harassment, including prevention, safe reporting, survivor-centred response and accountability.
SEAH	Sexual exploitation, sexual abuse and sexual harassment.
Sexual Abuse	Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
Sexual Exploitation	Actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically.
Sexual Harassment	Unwelcome conduct of a sexual nature, whether in person, online or through digital communication, where a reasonable person would anticipate that the person harassed may be offended, humiliated or intimidated.
Transactional Sex	The exchange of money, employment, goods, services, assistance or other benefits for sex or sexual favours.
Victim-survivor-centred	Prioritising the safety, dignity, rights, needs and wishes of the person affected, while meeting mandatory reporting obligations.
Victim/Survivor	A person who is, or has been, sexually exploited, abused or harassed.
Zero tolerance	GMP will take action to prevent SEAH, respond to every concern or allegation, and address failures to report, act or cooperate.

TABLE 1. VERSION CONTROL TABLE OS04 PSEAH

Version Number	Purpose/change	Author	Date
1	Adopted	Board	Mar2009
2	Amended to meet ACFID and DFAT PSEAH requirements and update points of contact.	Board	May2021
3	New format with Version Control Table and updated email addresses.	Board	Jun2023
4	Significant changes, including name change from Sexual Misconduct to PSEAH policy. Redrafted to align with current ACFID and DFAT PSEAH	Board	Sep2026

	expectations, including survivor-centred practice, mandatory reporting, risk-based safeguarding standards, focal point responsibilities, partner/downstream partner obligations, implementation, monitoring and Board oversight.		
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