



PREVENTION OF SEXUAL EXPLOITATION, ABUSE & HARASSMENT POLICY

APPLICABILITY: ACCI Missions & Relief Staff, Consultants, Contractors, Volunteers, Field Workers, Associates, Relief Partners, Missions Partners & Board Members (See Scope)

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AUTHORISED BY: ACCIR and ACCIM Boards

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PREAMBLE

There is no higher standard of just human interaction than that required of us by God and laid out for us in the Bible. God in His nature embodies love and justice and expects our relationships and interactions with others to be based on the same principles. ACC supports the view that human rights are grounded in a biblical understanding that all people are created equally and have equal value and equal dignity before God, affirmed not just in creation but also in redemption. All humans, regardless of race, religion, ethnicity, indigeneity, disability, age, displacement, caste, gender, gender identity, sexuality, sexual orientation, poverty, class and socio-economic status, hold human rights equally.

In fulfilling our responsibilities in light of the above, we affirm everyone's dignity and worth and protect each other's rights, through respectful interactions that seek to do no harm.

Sexual exploitation, abuse and harassment is a violation of basic human rights. ACCI Missions and Relief recognise that vulnerable adults and children are particularly at risk of sexual exploitation, abuse and harassment. Sexual exploitation, abuse and harassment, as well as a range of non-sexual abuses of power, 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. Therefore, this policy has been developed to outline our commitment and strategies to prevent and limit the risk of sexual exploitation, abuse and harassment occurring within our programs or perpetrated by our stakeholders.

GUIDING DOCUMENTS

- UN Universal Declaration of Human Rights
- UN Convention on the Elimination of Discrimination Against Women (CEDAW)
- UN Convention on the Rights of the Child (UNCRC)
- Convention on the Rights of Persons with Disabilities (CRPD)

PURPOSE

The purpose of this Prevention of Sexual Exploitation, Abuse and Harassment Policy (PSEAH) is to outline the preventative and responsive measures ACCI has in place to safeguard people against sexual exploitation, abuse and harassment. This policy aims to achieve this by:

- Demonstrating ACCI's commitment and approaches to prevention of sexual exploitation, abuse and harassment;
- Outlining the expectations and responsibilities of ACCI stakeholders;
- Providing guidance on how to respond to concerns and allegations; and
- Setting high standards around personal behaviour that must be adhered to by all ACCI stakeholders.

SCOPE

This policy applies to all **ACCI Stakeholders** defined below.

- All ACCI **Staff**
- All ACCI **Consultants and Contractors**
- All ACCI **Volunteers** including but not limited to office and event-based volunteers
- All ACCI **Field Workers**

- All ACCI **Associates**
- All ACCI **Missions Partners**
- All ACCI **Relief Partners**
- All ACCI **Board Members**

ACCI RELATED POLICY

This policy should be read and enforced together with:

- ACCI Child Safeguarding Policy and Procedures
- ACCI People Policy
- ACCI Gender Equality Policy
- ACCI Complaints Handling Policy
- ACCI Whistleblower Policy

OUR COMMITMENT

ACCI Missions & Relief (ACCI) is committed to:

- develop organisation-specific strategies to prevent and respond to sexual exploitation, abuse and harassment;
- create a safe working culture for all ACCI stakeholders;
- undertake risk assessments to identify areas of risk and mitigation strategies;
- ensure ACCI stakeholders are informed regarding the commitments and policies outlined in this document, including how to report concerns or allegations;
- investigate ALL reports of sexual exploitation, abuse and harassment linked to our stakeholders or ACCI-funded activities. Concerns or allegation of sexual exploitation, abuse and harassment will always be taken seriously, investigated and acted on; and
- take immediate and appropriate action against ACCI stakeholders who commit sexual exploitation, abuse or harassment.

DEFINITIONS

Sexual exploitation, abuse and harassment (SEAH) occurs against a child or an adult and can occur between people of the same or different genders. It includes situations such as:

- Sexual exploitation and abuse;
- Sexual harassment;
- Child sexual abuse and exploitation;
- Women and men sexually exploited through sex work;
- Possessing, controlling, producing, distributing, obtaining or transmitting sexually exploitative images of adults and children.¹

¹ AVI, Prevention of Sexual Exploitation and Abuse Policy, 2018, <https://www.australianvolunteers.com/assets/Uploads/ResourceFiles/09c9a5056f/Prevention-of-Sexual-Exploitation-and-Abuse-PSEA-Policy-FINAL-September-2018.pdf>.

Sexual Exploitation - any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.²

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 is considered to be sexual abuse.³

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.⁴

Child Abuse – The World Health Organisation defines Child Abuse as: “All forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power.”⁵ WHO, 2006

- **Physical abuse** is commonly characterised by physical injury resulting from practices such as punching, beating, shaking, biting, burning or otherwise harming a child.
- **Sexual abuse** occurs when an adult or older child, uses their power or authority over the child or takes advantage of the child’s trust to involve them in sexual activity. This sexual activity does not just mean sexual intercourse; it means any sexual activity including flashing, fondling, masturbating and oral sex.
- **Emotional abuse** tends to be a chronic behavioural pattern directed at the child/young person whereby their self-esteem and social competence is undermined or eroded over time.
- **Neglect** is characterised by the failure to provide for the child/young person’s basic needs. This can occur through direct and deliberate action or by omission or deliberate inaction to care for the child/young person.
- Abuse happens to both male and female children of all ages, ethnicities and social backgrounds, abilities, sexual orientation, religious beliefs and political persuasion. Abuse can be inflicted on a child by both men and women, as well as by young people themselves. Professionals and other adults working with children in a position of trust also abuse children.

Child Exploitation - Child exploitation includes one or more of the following:

- Committing or coercing another person to commit an act or acts of abuse against a child.
- Possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material.

² UN Secretariat, Secretary General Bulletin: Special measures for protection from sexual exploitation and sexual abuse, 2003, <https://www.unhcr.org/en-au/protection/operations/405ac6614/secretary-generals-bulletin-special-measures-protection-sexual-exploitation.html>.

³ Department of Foreign Affairs and Trade, Prevention of Sexual Exploitation, Abuse and Harassment Policy, 2019, <https://dfat.gov.au/international-relations/themes/preventing-sexual-exploitation-abuse-and-harassment/Documents/pseah-policy.pdf>.

⁴ Department of Foreign Affairs and Trade, Prevention of Sexual Exploitation, Abuse and Harassment Policy, 2019, <https://dfat.gov.au/international-relations/themes/preventing-sexual-exploitation-abuse-and-harassment/Documents/pseah-policy.pdf>.

⁵ [What is child abuse and neglect? | Australian Institute of Family Studies \(aifs.gov.au\)](https://www.aifs.gov.au/child-abuse-and-neglect/)

- Committing or coercing another person to commit an act or acts of grooming or online grooming.⁶

Fraternisation - 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.⁷

Program Beneficiary - A person engaged in, or benefiting from, an ACCI approved or funded activity.

Safeguarding - Actions, policies and procedures that create and maintain protective environments to protect people from exploitation, harm and abuse of all kinds.⁸

Survivor-centred Approach - A survivor-centred approach prioritises the rights, needs, wishes and empowerment of survivors of sexual exploitation and abuse (SEAH) in both the prevention of and response to SEAH. In practice, this means ensuring:

- those who are affected by SEAH have accessible mechanisms to make a complaint that are designed with their needs and contexts in mind;
- SEAH complaints are investigated sensitively and confidentially with primary concern for the survivor; and
- any response is both robust and sensitive to the wishes and protection of survivors.⁹

ACCI STAKEHOLDER STANDARDS / CODE OF CONDUCT

ACCI Stakeholders must uphold and promote the highest standards of ethical and professional conduct and abide by ACCI policies.

All ACCI Stakeholders will NOT:

- Request any service or sexual favour from beneficiaries of ACCI funded programs, children or others in the communities in which ACCI works, in return for protection or assistance.
- Engage in sexually exploitative or abusive relationships. An example of this would be using a position of authority or power to coerce a sexual favour or relationship from anyone, including a co-worker.
- Exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This prohibition against exchange of money for sex means ACCI Stakeholders must not engage the services of sex workers.
- Have sexual activity with any person under the age of 18, regardless of the local age of consent, i.e. the local or national laws of the country in which the stakeholder works. Ignorance or mistaken belief of the child's age is not a defence. Refer to ACCI Child Safeguarding Policy.

⁶AIFS, CFCA Resource Sheet, 2018, aifs.gov.au/cfca/publications/australian-child-protection-legislation.

⁷ Department of Foreign Affairs and Trade, Prevention of Exploitation, Abuse and Harassment Policy, 2019, <https://dfat.gov.au/international-relations/themes/preventing-sexual-exploitation-abuse-and-harassment/Documents/pseah-policy.pdf>

⁸ ACFID, Guidance for the Development of a Prevention of Sexual Exploitation, Abuse and Harassment Policy, https://acfid.asn.au/sites/site.acfid/files/resource_document/Guidance%20for%20the%20development%20of%20a%20PSEAH%20Policy.pdf.

⁹ Australian Council for International Development, https://acfid.asn.au/sites/site.acfid/files/resource_document/Guidance%20for%20the%20development%20of%20a%20PSEAH%20Policy.pdf

- Support or take part in any form of sexual exploitative or abusive activities, including, for example, child pornography.

ACCI Staff, Fieldworkers, Associates and Board Members MUST:

- Ensure they uphold the ACC Ministerial Code of Conduct. They must seek counsel from ACCI staff before entering a relationship which may be perceived as fraternisation, including with a program beneficiary.

All ACCI Stakeholders MUST:

- Undertake to create and maintain an environment that promotes implementation of this policy.
- Immediately report (within 48 hours) any concerns or suspicions they have regarding possible violations of this policy by other ACCI Stakeholders.
- 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 is not exploitative or such that it reasonably leads to a perception of exploitation or harassment.
- Immediately inform their ACCI Field Manager, Project Manager, or ACCI contact if they become engaged in a personal relationship which may be perceived as inappropriate or exploitative, including fraternisation, or where real or perceived unequal power dynamics exist. Workers who are unsure if their relationships fall into this category should discuss the situation with ACCI Staff. ACCI strongly discourages any stakeholders from engaging in such a relationship with a program beneficiary due to the inherent conflict of interest and potential for abuse of power. Such relationships can undermine the credibility and integrity of ACCI's work.

ACCI Stakeholders who are in management positions must:

- operate from a survivor centred approach
- commit to limit the use of non-disclosure agreements within grievance procedures.

PARTNER AND FIELD WORKER EXPECTATIONS

In addition to the above code of conduct, ACCI is committed to working alongside our missions and relief partners and field workers to improve their own strategies and procedures, based on their level of risk

Missions Partners and field workers are required to reflect consideration of PSEAH in their work or ministry which may include the following:

- Assess their inherent SEAH risk using ACCI inherent SEAH risk assessment tool;
- Conduct specific risk assessments and management plans based on inherent risk;
- Provide training to their own staff and stakeholders;
- Advocate within their umbrella organisation about PSEAH;
- Develop awareness raising and reporting mechanisms accessible to local community members;
- Ensure volunteers are covered by a PSEAH policy and code of conduct
- Develop their own organisational policies and procedures.

All ACCI Relief Partners are required to:

- Assess their inherent SEAH risk at onboarding and renewal using ACCI inherent SEAH risk assessment tool;
- Complete specific risk assessments and management plans at least every three years (or post safeguarding incident);
- Develop a policy that addresses preventative and responsive measures related to sexual abuse, exploitation and harassment relevant to their context;
- Consider providing training to their own staff and stakeholders;
- Develop awareness raising and reporting mechanisms accessible to local community members; and
- Receive monitoring visits from ACCIR staff, which will include monitoring and capacity building under this policy.

Coaching will be prioritised for ACCI stakeholders based on their engaging with the following highly vulnerable people who are:

- young adults >18 years old
- living with a disability
- of an ethnic, indigenous, religious or sexual minority
- experiencing poverty
- sex workers
- impacted by conflict and/or disasters
- displaced persons, refugees, migrants or asylum seekers
- part of female headed households
- victims/survivors of trafficking and/or other forms of sexual and gender-based violence
- in contact with the law
- accessing residential/shelter services
- travelling overnight to conduct program activities, attend conferences or other events

RECRUITMENT AND SCREENING

ACCI recruitment practices aim to recruit the safest and most suitable staff, field workers and volunteers and deter those who wish to cause harm to people from seeking engagement with ACCI. The following screening measures are required for all short-listed candidates or applicants:

- **Police Check;**
- **Working with Children Check** (or equivalent for the state/territory where they normally reside): Successful applicants must keep this check renewed throughout their employment, volunteering or time as a field worker; and
- **Reference Checks:** A minimum of two non-related referees will be contacted verbally and asked specific questions regarding any concerns of sexual misconduct.

TRAINING AND AWARENESS

All ACCI stakeholders have a role to play in safeguarding the rights and protection of people from all forms of abuse, exploitation and harassment. Therefore, ACCI is committed to ensuring we equip and train all our stakeholders to outwork this responsibility and promote the protection and rights of those in contact with our programs and people.

ACCI will ensure all stakeholders:

- receive this policy and relevant induction training at the commencement of their engagement with ACCI; and
- sign and agree to abide by this policy through contracts, fieldworker agreements and relief partnership agreements as well as in the annual ACCI code of conduct refresher course.
- Have access to resources to support the implementation of this policy including tools and templates, training and coaching.

Additional training and awareness raising may also be provided through the following mechanisms:

- Monitoring Visits
- ACCI's Safer Churches Training for ACC Credential Holders or as requested.
- Sessions and workshops at annual conferences and other events.

REPORTING

ACCI is committed to providing a safe, supportive and secure environment to report SEAH. ACCI will take all concerns seriously and respond immediately. All reports of SEAH will be recorded.

ACCI stakeholders must immediately report (within 48 hours) any concerns, suspicions or allegations of sexual exploitation, abuse, harassment or breach of this policy. This includes any concerns, suspicions or allegations involving an employee/volunteer of an ACCI fieldworker/partner or any incident occurring within an ACCI funded activity.

Community members, or any other external people are also strongly encouraged to report any concerns and to immediately notify ACCI if they, or someone they know, is thought to have been the victim/survivor of sexual exploitation, abuse and harassment perpetrated by an ACCI stakeholder or within an ACCI program or funded activity.

A report should be made to ACCI's Safeguarding Officer

ACCI Safeguarding Officer (SO)

childprotection@acci.org.au

1300 997 502 or +61 3 8516 9600

44 Lakeview Drive, Suite 525, Scoresby Victoria 3179

Or, alternatively,

if the allegation is against the SO, reports can be directed towards ACCI's National Director

director@acci.org.au

1300 997 502 or +61 3 8516 9600

44 Lakeview Drive, Suite 525, Scoresby Victoria 3179

The ACCI Whistleblower Policy is in place to ensure protection and support for any person making such a report.

INVESTIGATION

When an allegation, belief or suspicion of sexual exploitation, abuse or harassment is reported, ACCI's Safeguarding Officer (SO) will act immediately by launching an investigation and developing an investigation

plan based on the following procedures and in accordance with the ACCI Complaints Handling Guiding Principles. If the incident involves a child, ACCI's Child Safeguarding Policy will be followed.

All reports will be investigated in accordance with the procedure stated below, irrespective of the identity of alleged perpetrator. When applicable, the incident is reported to the police, government agencies or other relevant organisations.

During the investigation:

- The SO will lead the investigation with other members of ACCI senior management and if deemed appropriate an ACCI Board member or ACC representative. Giving consideration to gender diversity among the group.
- The SO will ensure relevant laws and legislative procedures are followed (external legal advice will be sought when required).
- The reporter, victim/survivor and person subject to an allegation will be treated with respect from the start of the process until the case is closed. External counselling will be provided, if necessary, to those involved.
- The person subjected to an allegation may be stood down or partnership suspended. This process does not indicate guilt or innocence. If the individual is an employee or field worker, they will continue to receive full pay and other entitlements.
- ACCI will seek to be guided by respect for the choices and wishes of the victim/survivor, whilst also ensuring that due process, outlined in this policy, is followed. This could include ensuring a gender appropriate translator and or liaison point etc.
- All interviews with the victim/survivor during the course of an ACCI investigation will be conducted by someone with appropriate training to reduce the risk of re-traumatisation.
- If the allegation involves an ACCI relief or missions partner and it is considered in the best interests of children/adult involved; or if the organisation is non-cooperative, then ACCI may suspend the partnership (including discontinuing accepting or disbursing funds) until the investigation has concluded and an acceptable resolution has been achieved.
- The investigation will be given high priority throughout the duration of the investigation.

What happens if the incident is proven or suspicion credible?

In the event that an incident has been proven or there is credible suspicion, ACCI parties, including the Safeguarding Officer, National Director and members of the board as necessary, will determine what action should be taken based on the severity of the allegation and in consultation with relevant parties following the investigation process. In the result of a proven incident or credible suspicion the following outcomes are possible:

Minor Breaches

- Responses may include providing further education regarding this policy, the importance of PSEAH and outlining consequences of ongoing non-compliance.

Serious Breaches

- Termination of employment or association with ACCI

- Referral to law enforcement authorities as appropriate (as per national and any mandatory reporting laws)
- If incident involves an ACC credential holder, the ACC National Office may be notified in alignment with *ACC Grievance Procedure for Certificate Holders*.
- If an incident involves an ACC relief partner and reasonable action is not taken to address the concern, ACCI will end the partnership.

SURVIVOR SUPPORT AND ASSISTANCE

ACCI will ensure survivors of sexual exploitation, abuse and/or harassment are offered support and assistance, such as referral to safe health/medical, psychosocial and legal/justice services where appropriate and, where required, to specialised children’s or women’s facilities

BREACH OF POLICY

Sexual exploitation, abuse and harassment constitute acts of gross misconduct and are therefore breach of this policy is potentially grounds for termination of employment or association with ACCI. Any reported or suspected breach of policy will be managed in accordance with the investigation procedures.

REVIEWING THE POLICY

This policy will be reviewed **every three years**. ACCI Safeguarding Officer will manage the review and stakeholders will be consulted during this process.

Version	Date	Key Changes
Version 1		
Version 2		
Version 3	2019	<ul style="list-style-type: none"> • Addition of Harassment in Policy • Added Partner and Fieldworker Expectations • Clarified ACCI stakeholder standards • Updated community reporting mechanism
Version 4	2022	<ul style="list-style-type: none"> • Addition of Code of Conduct Appendix • Enhanced Partner expectations • Clarified Stakeholder code of conduct • Added guiding documents • Clarified breach of policy and incident responses
Version 5	2025	

APPENDIX 1: CONFIDENTIAL INCIDENT REPORTING FORM



In accordance with ACCI's reporting procedures, any incident, belief or suspicion of sexual exploitation, abuse or harassment violation is to be reported and the information passed on to the ACCI Safeguarding Officer. This includes non-compliance with ACCI Prevention of Sexual Exploitation, Abuse or Harassment Policy. Activities or practices in ACCI projects that do not protect the best interests of the victim/survivor or do not meet applicable local laws or standards must also be reported.

Please note:

- In no way, nor under any circumstances, is anyone on the field or in Australia to attempt to persuade someone not to notify, or even to delay notifying, authorities in the case of a sexual exploitation, abuse and harassment concern.
- It is not your responsibility to investigate even for the purpose of gathering information for this form. It is sufficient to just report on what you observed, are aware of, or were told.

PART ONE: ABOUT YOU (Note: This form is to be filled out by the person making the report)

Name: _____

Contact Details (e.g. phone, email, address): _____

Relationship with ACCI (e.g. Field Worker, Employee, Volunteer etc): _____

Relationship with victim/survivor:

PART TWO: VICTIM/SURVIVOR DETAILS

Name (s): _____ Age: _____ Gender: F / M

Any other relevant details or issues to be aware of (e.g. cultural issue, disability, ethnicity, religion etc):

Who does the individual live with (include address and contact details)? _____

Is the individual aware of this referral? Yes/No If relevant, is the parent/guardian aware of this referral? Yes/No

Where is the individual now? Is s/he in a place of safety and are there any immediate medical issues?

PART THREE: YOUR CONCERN

Sexual Exploitation, Abuse or Harassment concern:

- Observed/suspected by yourself
- Disclosure by the person
- Allegation made by (name & details) _____

Date(s), time(s) and location(s) of incident(s): _____

Who is the person suspected?

- ACCI Staff, Field worker or other representative
- Staff of an ACCI Strategic Partner
- Someone in the community

Name and other relevant details of person suspected (e.g. address, job position, relationship with person, etc):

Details of Report

Please include the following:

- Details of the sexual exploitation, abuse or harassment concern or incident (Include what is alleged to have happened? What were the circumstances?, etc)
- Write down exactly what the victim/ survivor has said (in his/her own words) and what you said (NB: Do not ask the victim/survivor leading questions - record actual details)
- Observations made by you (e.g. observed injures, persons perceived emotional state etc. Mark which observations are fact or opinion)

Have local authorities/external agencies been notified? Yes/No Date of notification: _____

Explain (e.g. name of authorities/agency, advice received, actions etc):

Signature: _____ Date: _____

PART FOUR: TO BE FILLED OUT BY ACCI MISSIONS & RELIEF SAFEGUARDING OFFICER

Date matter was referred: _____ Date responded to complainant: _____

Investigation: How was the investigation conducted? Who was involved in the investigation, roles and responsibilities? Include key dates of investigation.

Findings & Comments:

Actions: Include action taken and any continued follow-up needed.

Organisational Change Opportunities Identified: Strengths and weaknesses in areas such as the PSEAH Policy and its implementation and management etc.

Recommendations: To prevent possible sexual exploitation, abuse and harassment violations and improve the investigation process in the future.

Report prepared by: _____

Signed: _____ Date: _____

Safeguarding Officer Name: _____

Signed: _____ Date: _____

APPENDIX 2: PSEAH CODE OF CONDUCT

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- Have sexual activity with any person under the age of 18, regardless of the local age of consent, i.e. the local or national laws of the country in which the stakeholder works. Ignorance or mistaken belief of the child's age is not a defence. Refer to ACCI Child Safeguarding Policy.
- Support or take part in any form of sexual exploitative or abusive activities, including, for example, child pornography.

ACCI Staff, Fieldworkers, Associates and Board Members MUST:

- Ensure they uphold the ACC Ministerial Code of Conduct—They must seek counsel from ACCI staff before entering a relationship which may be perceived as fraternisation, including with a program beneficiary.

All ACCI Stakeholders MUST:

- Undertake to create and maintain an environment that promotes implementation of this policy. ^[SEP]
- Immediately report (within 48 hours) any concerns or suspicions they have regarding possible violations of this policy by other ACCI Stakeholders.
- 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 is not exploitative or such that it reasonably leads to a perception of exploitation or harassment.
- Immediately inform their ACCI Field Manager, Project Manager, or ACCI contact if they become engaged in a personal relationship which may be perceived as inappropriate or exploitative, including fraternisation, or where real or perceived unequal power dynamics exist. Workers who are unsure if their relationships fall into this category should discuss the situation with ACCI Staff ACCI strongly discourages any stakeholders from engaging in such a relationship with a program beneficiary due to the inherent conflict of interest and potential for abuse of power. Such relationships can undermine the credibility and integrity of ACCI's work.

ACCI Stakeholders who are in management positions MUST:

- operate from a survivor centred approach
- commit to limit the use of non-disclosure agreements within grievance procedures.

DECLARATION

I have read and understood the ACCI PSEAH Policy and agree to adhere to the above Code of Conduct.

Signed: _____

Date: _____

Name: _____