



SAFEGUARDING/PSEAH POLICY & PROCEDURES

1. PURPOSE

The purpose of this policy is to safeguard people, particularly children, at risk adults and recipients of development and relief assistance, through protection against sexual exploitation, abuse, and harassment (PSEAH) that may be caused due to their engagement with ADRA New Zealand (hereafter referred to ADRA) or its partners. This policy and procedures include Vulnerable Children's Act (VCA) 2014 requirements.

This policy exists so that

- Ultimately, there is no sexual exploitation, abuse, and harassment (SEAH) of children or any vulnerable adults who interact/engage with ADRA personnel during humanitarian and development work.
- ADRA continuously strengthens an organisational wide culture of increasing justice, compassion and love in which there is no place for SEAH in any form.
- Internally, ADRA personnel know clearly that any form of SEAH is unacceptable.
- Externally, partners and communities ADRA works with, know ADRA's standards of behaviour relative to sexual relationships.
- All ADRA personnel know how to report and make a complaint relative to SEAH incidents, and mechanisms for this are clear, accessible, sensitive to gender and culture, and confidential.
- Responses to SEAH allegations are people-focused and needs of those involved are prioritised.

2. POLICY STATEMENT

ADRA believes that everyone engaging with ADRA personnel or associated stakeholders, regardless of age, gender identity, disability, or ethnic origin, has the right to be protected from all forms of harm, abuse, neglect and exploitation.

3. SCOPE

This policy is applicable to:

- 'ADRA personnel', refers to ADRA employees in New Zealand, Board of Trustee members, interns, volunteers, contractors, or anybody else with delegated and documented responsibility engaged by or representing ADRA in a short or long-term capacity.
- 'Partners', refers to external entities such as implementing partner ADRA offices, Seventh-day institutions and churches in New Zealand, and other stakeholders with which ADRA in New Zealand has engaged and documented partnership and project agreements for the implementation of development and/or relief activities. Partner personnel include part-time or full-time staff, Board members, consultants, volunteers, contractors or anybody else with delegated and documented responsibility.

4. DEFINITIONS

Safeguarding - means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. In the humanitarian and development sector, this means protecting people, including children and at-risk adults, from harm that arises from engaging with ADRA personnel or in-country partner office personnel.

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 children (under the age of 18) is considered a 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 ADRA personnel.

Other relevant definitions are found in Annex A.

5. PRINCIPLES

This policy is developed upon the following six Safeguarding principles¹ on SEAH:

Principle 1: Zero tolerance of inaction

Sexual exploitation, abuse and harassment are never acceptable. ADRA recognises that achieving a significant reduction in SEAH is a long-term endeavour that needs a significant investment in prevention and that will result in increased reporting. Zero tolerance means acting on every allegation in a fair and reasonable way with due regard for procedural fairness. Zero tolerance does not mean that there will be zero incidents. However, inaction under any circumstances is not acceptable.

Principle 2: Strong leadership accelerates culture change

ADRA recognises that strong leadership is essential for diminishing the risk of SEAH. Leaders set organisational culture through setting clear expectations, modelling respectful behaviour in their interactions at work, taking measures to improve diversity, inclusion and gender balance; encouraging scrutiny of their own behaviour and that of senior management; ensuring strong, actionable human resource procedures that embed gender equality; the inclusion of the prevention of SEAH discussions on board meeting agendas; and having senior champions responsible for the prevention of SEAH.

Principle 3: Survivor needs are prioritised

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;

¹ Principles adopted from the Australian Government, Preventing Sexual Exploitation, Abuse and Harassment Policy, Department of Foreign Affairs and Trade, 4 April 2019



ADRA NZ Policies and Procedures		
Document Name and Number		Page 3 of 16
Safeguarding/ PSEAH Policy & Procedures		
Department	Sections (inc. All sections where this document is located.)	
Corporate Services	Core Documents/CS	
Modified By	Document Version	Effective Date
ADRA Staff	2019/1.1	10 September 2019
Approving Committee	Previous	Revision Date
ADRA Board of Trustees		September 2021

- does not discriminate based on gender, age, race/ethnicity, ability, sexual orientation, or other characteristics;
- considers the need and provides for counselling and health services to assist the victim/survivor with their recovery.

Principle 4: Protection against Sexual Exploitation, Abuse and Harassment is a shared responsibility

Protection against sexual exploitation, abuse and harassment is everyone’s responsibility. ADRA will do its best to support its associated personnel and the community at large to collectively address SEAH in areas of concern. This will include supporting partners or other stakeholders to implement SEAH prevention and monitoring mechanisms.

Principle 5: Gender inequality and other power imbalances increase vulnerability

Available data indicates that the majority of SEAH victims/survivors are female and most perpetrators are male. However, there are also other power imbalances at play. Inequalities 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 beneficiaries in our work should be based on respect for diversity, promotion of gender equality and social inclusion, accountability, and a strong “do no harm” focus.

Principle 6: Stronger reporting will enhance accountability and transparency

Sexual exploitation, abuse and harassment are a failure of responsibility. ADRA acknowledges its accountability to not only donors, but also to the communities, and other stakeholders it engages with. Stronger reporting will allow ADRA to better monitor SEAH, understand risks, improve assurance and work with its partners to improve systems and safeguards accordingly. Beneficiaries will be informed of their rights and how to access appropriate reporting channels.

In addition to the above principles, ADRA is also committed to the Interagency Standing Committee’s (IASC) Six Core Principles Relating to SEAH. See Annex B.

6. RISK ASSESSMENT

Robust controls to identify, manage, monitor and mitigate the risk of SEAH through will be implemented through this policy.

Within programming approaches, ADRA and its Partners will assess the level of safeguarding risk for SEAH occurring and apply the Safeguarding/ PSEAH Minimum Standards (Annex C) accordingly. This is particularly crucial in humanitarian settings. The Safeguarding/ PSEAH Minimum Standards are then applied commensurate with the level of risk identified.

Risk and decision-making processes and documents will reflect this assessment. This does not need to be a standalone procedure and will be incorporated into existing activity planning and risk management processes.

The risk assessment is updated on an annual basis.



7. PREVENTION

A. Leadership

- a. ADRA's board and senior leaders should lead by example to nurture a strong safeguarding culture that addresses structural inequalities based on gender, ethnicity, socio-economic status, sexuality and age within the workplace.
- b. ADRA will seek out gender and safeguarding expertise as desirable skills and experience when recruiting new people to the board.
- c. ADRA's Administrative Committee (ADCOM) and senior managers will set clear expectations and model respectful behaviour in their interactions at work.
- d. ADRA's Safeguarding Focal Point people have an overall responsibility for the development and implementation of prevention of Safeguarding policy and procedures. These people will report regularly to ADCOM on safeguarding matters.
- e. ADRA's leadership will create a speak-up culture on safeguarding issues.

B. Recruitment and Screening

- a. For employed positions, ADRA's recruitment and screening process includes the following components to help prevent the recruitment or engagement of any persons who pose an unacceptable safeguarding risk. Procedures include:
 - i. A statement on ADRA's zero-tolerance on safeguarding will be included on all job advertisements, job descriptions and performance management reviews.
 - ii. Applicants are requested to disclose whether they have had a substantiated safeguarding claim of any nature made against them in New Zealand or overseas. This is included in the Job Application Form and Consultant Agreement.
 - iii. Behavioural interview questions about sexual harassment and abuse are used to determine past actions, beliefs, attitudes, motivations, and values regarding children, women, men and all vulnerable adults and towards working with these groups.
 - iv. Two verbal reference checks, which include asking questions relating to any concerns about the candidate's conduct in the context of SEAH. One reference must be from the person's current or most recent employer.
 - v. All contracts require contractors to agree to ADRA's Code of Conduct, which includes a safeguarding/PSEAH section.
 - vi. The induction process will include the highlighting of behavioural expectations relative to safeguarding/PSEAH within the workplace.
 - vii. Every employee or intern (new or on-going) will undergo police vetting every three years to check any SEAH related criminal record.
 - viii. Before partnering with SDA institutions and churches in New Zealand ADRA will ensure these partners abide by AdSAFE safeguarding policy and code of conduct.
- b. All employment contracts contain provisions for disciplinary actions up to and including dismissal for any person who breaches the Code of Conduct, which includes a safeguarding and PSEAH section.
- c. ADRA personnel are responsible for reporting a change in their circumstances to ADRA's management by reporting any current criminal or civil court proceedings relating to safeguarding matters or any allegations arising involving themselves.



- d. ADRA will collaborate with other stakeholders in the sector to improve employment practice and background checking to minimise opportunities for perpetrators to access the sector and move between organisations.
- e. For volunteers, ADRA will ensure that
 - i. Police vetting is undertaken
 - ii. The induction process will include the highlighting of behavioural expectations relative to safeguarding matters within the workplace.

C. Personnel Conduct

The following standards of conduct apply within ADRA's work environment:

- a. SEAH by any ADRA personnel constitute acts of gross misconduct and are therefore grounds for termination of employment.
- b. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence (Please refer to ADRA's Child Protection Policy for more information).
- c. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour are prohibited. This includes exchange of assistance that is due to beneficiaries.
- d. Sexual relationships between ADRA personnel (including partners) and beneficiaries is not permitted since this is contrary to ADRA's values and are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of development and humanitarian aid work.
- e. Where an ADRA personnel develops concerns or suspicions regarding SEAH by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.

D. Programmes

Inherent within ADRA's values-based approach to programming is respect for diversity, gender equality and equity, social inclusion, accountability and a "do-no-harm" focus. The following programming practices will be implemented to help strengthen healthy relationships and minimise safeguarding risks.

- a. Project/programme design processes include systematic analysis of context power dynamics and issues of gender equality and equity that lead to project approaches and activities to mitigate safeguarding risks. Appraisal and project selection processes will take these into account.
- b. ADRA will work through its personnel development and programming activities to
 - i. Challenge attitudes which permit or excuse sexual misconduct internally and/or in programme activities.
 - ii. Ensure that gender equity is a programming priority.
- c. Ensure safeguarding measures such as community awareness raising or undertaking a risk analysis are adequately included in proposal and/or funding applications.
- d. Include activities on safeguarding awareness and sensitivities in project plans.
- e. All programmes will be based on a thorough safeguarding risk assessment (See Section 5).

E. Training & Awareness Raising

The following activities will be carried out to continuously strengthen ADRA's organisational culture of respect in which there is no place for SEAH in any form, and to ensure that ADRA



personnel know clearly that any form of SEAH is unacceptable:

- a. During the induction process with new employees, ADRA's safeguarding standards will be made explicit.
- b. All ADRA personnel will receive mandatory safeguarding/ PSEAH training so that they understand the relevant principles, their responsibilities in treating each other respectfully, and reporting mechanisms in place if they become aware of any safeguarding related concerns or allegations.
- c. For ADRA personnel involved in disaster response, pre-deployment training will include scenario-based discussions about power imbalances, status and workplace cultures of the destination country and the potential impact of these on those deployed.
- d. ADRA will ensure safeguarding requirements are both understood and met by their stakeholders (consultants, contractors, supporters and partners) through training and support.
- e. Job descriptions and performance management processes will include behavioural components that support implementation of ADRA's Code of Conduct.

F. Working with Partners, Suppliers & Contractors

- a. A Memorandum of Understanding (MOU) and/or a Project Agreement governs the formal relationship between ADRA and Partners. By signing this MOU or Project Agreement, Partners agree to abide by the safeguarding standards as outlined in this policy and ensure that any downstream Partners also agree to abide by the same standards.
- b. As part of the MOU and/or Project agreement, partners will be supported to fulfil their responsibility to provide safeguarding training for their downstream partners.
- c. Safeguarding risk assessment will be included as part of the partner assessment tool to determine the risk level of a potential partner.
- d. All contracts with contractors must include a requirement for the contractor to agree to abide by the standards within this policy and ensure that any agreed subcontractors also abide by the same policy.

G. Engagement with Communities

ADRA will ensure through its MOUs, Project Agreements and personnel interactions that each in-country partner engaging directly with communities, has provided appropriate information to these communities on the expected behaviour of ADRA personnel, and that detailed complaints and reporting procedures, which have been developed through consultative processes, are operational.

8. RESPONSE TO INCIDENTS

A. Reporting

- a. ADRA will treat all raised concerns seriously and ensure that all parties are treated fairly.
- b. Who reports?
All ADRA personnel as defined under the Policy's scope must report any alleged or suspected safeguarding incidents or Policy non-compliance that comes to their attention.
- c. What is to be reported?
Reporting is for any suspected or alleged safeguarding cases perpetrated by anyone



within the scope of the Policy in connection with official duties or business. If in doubt, ADRA personnel should report an alleged incident.

Reports of abuse or exploitation of individuals under the age of 18 years must follow ADRA's Child Protection Policy.

Details of information to be reported are found in Annex D.

d. When to report?

All ADRA personnel are required to report **immediately** to the ADRA Safeguarding Focal Point (or if the ADRA Safeguarding Focal Point is not available, to the ADRA CEO) if they have any suspicion or knowledge of occurring safeguarding matters. Verbal complaints by stakeholders must be documented by personnel and submitted in written form if the stakeholder is unable or unwilling to submit personally.

Reports must be made within 24 hours of the complaint being identified or within 24 hours of access to means of communication with the ADRA Safeguarding Focal Point.

e. How to report?

All reports of alleged safeguarding incidents should be made using the ADRA Safeguarding Complaint Form and anonymously emailed to the ADRA Safeguarding Focal Point:

- Safeguarding Focal Point for incidents outside New Zealand: Virginia Pycroft viriniapycroft@adra.org.nz; or Sahara Anae saharaanae@adra.org.nz depending on the country of the safeguarding incident.
- Safeguarding Focal Point for incidents inside New Zealand: Sally Lavea sallylavea@adra.org.nz

Reports will be dealt with in a timely manner, and where required will be reported to relevant regulatory bodies/donors such as MFAT and ADRA International. Where safe to do so, and when in accordance with the wishes of the victims, survivors and whistle-blowers, all alleged safeguarding incidents that involve a criminal aspect should be reported through the correct local law enforcement channels.

f. Community reporting

Communities involved in ADRA funded activities must be informed on how to raise a concern about the safety of anyone within their community, including threats or actual safeguarding incidents. This will be done through a functional community-based complaints procedure in line with ADRA' complaints mechanism.

g. Confidentiality

Confidentiality is an ethical principle that restricts access to and dissemination of information. Confidentiality helps create an environment in which witnesses are more willing to recount their versions of events and builds trust in the system and in the organisation. All incidents and alleged safeguarding incidents are to be handled with sensitivity and confidentiality, to the extent permitted by relevant laws. During investigations only a limited number of authorised people will be informed of the incident.



Safeguarding/ PSEAH Policy & Procedures

Department

Sections (inc. All sections where this document is located.)

Corporate Services

Core Documents/CS

Modified By

Document Version

Effective Date

ADRA Staff

2019/1.1

10 September 2019

Approving Committee

Previous

Revision Date

ADRA Board of Trustees

September 2021

At a minimum, this will include the ADRA Safeguarding Focal Point and the ADRA CEO. All documentation of any allegations made, either electronic or paper, is always to be kept in a secure place.

- h. The ADRA Board of Trustees and ADRA International will be notified of any reports made (though details may be kept confidential).

Please see Annex E for ADRA Safeguarding/PSEAH Reporting Process.

B. Investigations

The following apply to investigations in response to any safeguarding complaint, allegation, suspicion, or breach of this policy:

- a. ADRA will ensure that investigations are conducted by experienced and qualified professionals that deal with safeguarding matters.
- b. ADRA may engage AdSAFE Ltd (sps.org.au) for professional advice on safeguarding allegations. AdSAFE Ltd (AdSAFE) is a separate incorporated entity set up for the Seventh-day Adventist Church to protect children and vulnerable people from many forms of abuse, serving the South Pacific Region.
- c. If the safeguarding/ SEAH complaint is reported by partners or community members, ADRA will work with the leaders of the in-country partner organisation and community to identify experienced and qualified professionals to conduct an investigation. If this expertise is not available in-country, ADRA will assist the in-country partner to access the right expertise from New Zealand or elsewhere.
- d. If the in-country partner is not able to coordinate the investigation, ADRA in New Zealand will take the role of coordinator and ensure an investigation is properly conducted.
- e. ADRA personnel are required to report, not to investigate or substantiate claims in any way.
- f. ADRA will include a budget line within project budgets and/or Admin budget to cover safeguarding investigations.
- g. Each investigation should be carefully recorded and safely filed.
- h. The investigation status and subsequent action will be shared with the survivor. The complainant will be informed of the status of the investigation, but confidential information will not be shared with them.
- i. ADRA may report investigation information to MFAT, and other stakeholders as relevant.
- j. During the process, ADRA will adhere to privacy laws and respect information.
- k. Investigations will commence within 10 days (domestic complaints) and no later than 15 days (international complaints) of a report being received.
- l. Substantiated complaints will result in either disciplinary action, contractual consequences or other action according to legislation of the setting of the incident. In this case, a disciplinary letter will be issued to the respective person and a record kept in a confidential file.
- m. If allowed by local law, ADRA will provide adequate information to other potential employers when approached for a reference check on a former staff member dismissed for substantiated SEAH.
- n. ADRA will report criminal actions to local authorities provided the risk is manageable and in line with the wishes of the survivor.

Please see Annex F for ADRA Safeguarding/PSEAH Response Process.



Safeguarding/ PSEAH Policy & Procedures

Department

Sections (inc. All sections where this document is located.)

Corporate Services

Core Documents/CS

Modified By

Document Version

Effective Date

ADRA Staff

2019/1.1

10 September 2019

Approving Committee

Previous

Revision Date

ADRA Board of Trustees

September 2021

C. Survivor Support Guidelines

- a. ADRA will ensure a survivor-centred approach in dealing with safeguarding matters. This approach will ensure all responses are developed in a manner that balances respect for due process, in which the survivors' wishes, safety, and well-being remain a priority in all matters and procedures.
- b. All alleged survivors should be assessed for immediate risks. A risk assessment will be conducted of the situation and information available to ensure the safety and security of those involved, and to ascertain support services required.
- c. In-country support services will be identified and shared with the survivor.
- d. At a minimum, ADRA through its partners will provide counselling support services for the survivor if desired. Assistance will be provided during the reporting/investigation stage, and ongoing support if the complaint is substantiated. This may include: referral to safe health/medical, psychosocial and legal/justice response where appropriate and where required to specialised children's or women's services.
- e. A budget line item will be set aside for survivor support.
- f. Survivors will be provided with information on the progression of an investigation and final outcomes.

ADRA is committed to staying up to date with sector minimum standards as they relate to the prevention of SEAH, and to reviewing our policies and procedures every two years unless required earlier.

9. RELATED POLICIES AND DOCUMENTS

Code of Conduct

Workplace Relations Policy

Child Protection Policy

Whistleblower Policy

Complaints Policy & Procedures

Complaints Policy & Procedures - Personnel



ADRA NZ Policies and Procedures		
Document Name and Number		<i>Page 10 of 16</i>
Safeguarding/ PSEAH Policy & Procedures		
Department		Sections (inc. All sections where this document is located.)
Corporate Services		Core Documents/CS
Modified By	Document Version	Effective Date
ADRA Staff	2019/1.1	10 September 2019
Approving Committee	Previous	Revision Date
ADRA Board of Trustees		September 2021

ANNEX A – OTHER DEFINITIONS

CHILD/CHILDREN	In accordance with the United Nations Convention on the Rights of the Child, ‘child’ means every human being under the age of 18 unless under the law applicable to the child, majority is attained earlier. For the purposes of this Policy, ADRA Australia considers a child to be a person under the age of 18 years.
CONTRACTOR(S)	A person or entity engaged pursuant to a contract for services. Includes: <ul style="list-style-type: none"> • specified Personnel nominated in a head agreement with an intermediary company (the contractor) to which a payment is made (although the specified Personnel may themselves be employees and not independent contractors): or • If the person performing the service is the service provider; he/she is an independent contractor.
PARTNERS	Includes all organisations, individual and contractors with whom ADRA directly enters into an Agreement to deliver its objectives, including but not limited to: <ul style="list-style-type: none"> • ADRA Country Offices • SDA Churches in New Zealand • Contractors and service providers including consultants, advisers and other directly contracted individuals • Non-Government Organisations (NGO), Civil Society Organisations (CSO) • Grant recipients
DOWNSTREAM PARTNER	Organisations, individual and contractors who are engaged by an ADRA Partner to perform ADRA business.
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.
PERPETRATOR	A person (or group of persons) who commits an act of SEAH or other type of crime or offence.
TRANSACTIONAL SEX	The exchange of money, employment, goods or services for sex, including sexual favours
VICTIM/ SURVIVOR	A person who is, or has been, sexually exploited, harassed or abused.



ANNEX B - Principles of the Interagency Standing Committee (IASC):

1. Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a 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 is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Sexual relationships between humanitarian workers and beneficiaries are strongly discouraged since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of humanitarian aid work.
5. Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
6. Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.



ADRA NZ Policies and Procedures		
Document Name and Number		<i>Page 12 of 16</i>
Safeguarding/ PSEAH Policy & Procedures		
Department		Sections (inc. All sections where this document is located.)
Corporate Services		Core Documents/CS
Modified By	Document Version	Effective Date
ADRA Staff	2019/1.1	10 September 2019
Approving Committee	Previous	Revision Date
ADRA Board of Trustees		September 2021

ANNEX C – Safeguarding & PSEAH Minimum Standards (adopted from MFAT)

MFAT Minimum Standards	Obligation	
	Organisation	Individual
1. Demonstrated understanding of PSEAH policies principles and standards.	Must demonstrate organisational commitment to PSEAH through a documented PSEAH Policy or equivalent that aligns with the Principles and Minimum Standards set out in this document. Must be able to demonstrate staff awareness and understanding of this Policy.	Must be able to demonstrate an ongoing understanding of and commitment to the principles and standards set out in this Policy.
2. Have SEAH reporting and investigation procedures in place.	Must be able to demonstrate that all SEAH incidents are managed, reported and investigated in a timely and consistent manner. Procedures must ensure that incidents are escalated to senior management and reported to MFAT in line with reporting standards set out in this document.	Must ensure incidents are escalated to MFAT in line with reporting standards set out in this document.
3. Have risk management processes that include the risk of SEAH.	Must have effective risk management assessments and mitigations in place that consider the risk of SEAH.	Must demonstrate effective risk management assessments and mitigations that consider the risk of SEAH.
4. Incidents and non-compliance reported to MFAT.⁵	An alleged SEAH incident must be reported to MFAT within two working days of the organisation becoming aware of the incident. Any SEAH Policy non-compliance must be reported to MFAT within five working days. The report must summarise the non-compliance and set out the actions the delivery partner has taken or will take.	Must report any alleged SEAH incident within two working days. Must report any non-compliance to MFAT's PSEAH Policy within five working days.



MFAT Minimum Standards	Obligation	
	Organisation	Individual
5. Effective PSEAH training in place.	Must be able to demonstrate ongoing PSEAH training for personnel (including downstream partners) that deliver the New Zealand Aid Programme.	Must demonstrate completion of PSEAH training. This includes recertification.
6. Recruitment and screening processes and employment practices address and manage the risk of SEAH.	Must be able to demonstrate robust PSEAH recruitment and screening processes for all personnel / consultants including having in place appropriate and enforceable standards of conduct.	
7. Transactional sex ⁶ is prohibited in humanitarian and disaster response settings. It is also prohibited in locations where transactional sex is illegal or where there is no regulation to adequately protect sex workers.	Delivery partners must have a policy that meets this minimum standard and considers additional risk factors that would warrant the prohibition of transactional sex. Must demonstrate effective communication of transactional sex policies to its staff and downstream delivery partners.	Must demonstrate completion of PSEAH training. This includes recertification.
8. MFAT requires delivery partners have a policy or equivalent that specifically addresses Fraternisation ⁷ .	MFAT does not seek to prohibit fraternisation but does require the delivery partner to have a policy that addresses the potential harm caused by fraternisation.	



ANNEX D – Complaints Form

PART A – Complainant to complete

Person making complaint (can be anonymous):

Date:

1. Who is the complaint about?
2. Who was the victim of the breach of conduct (name and contact details desirable but not essential)?
3. When did the breach of conduct occur?
4. What was the breach of conduct?
5. Where did the breach of conduct occur?
6. Who else was involved in this breach of conduct?
7. How did you come by this information about the breach of conduct?
8. Any other details you would like to add?

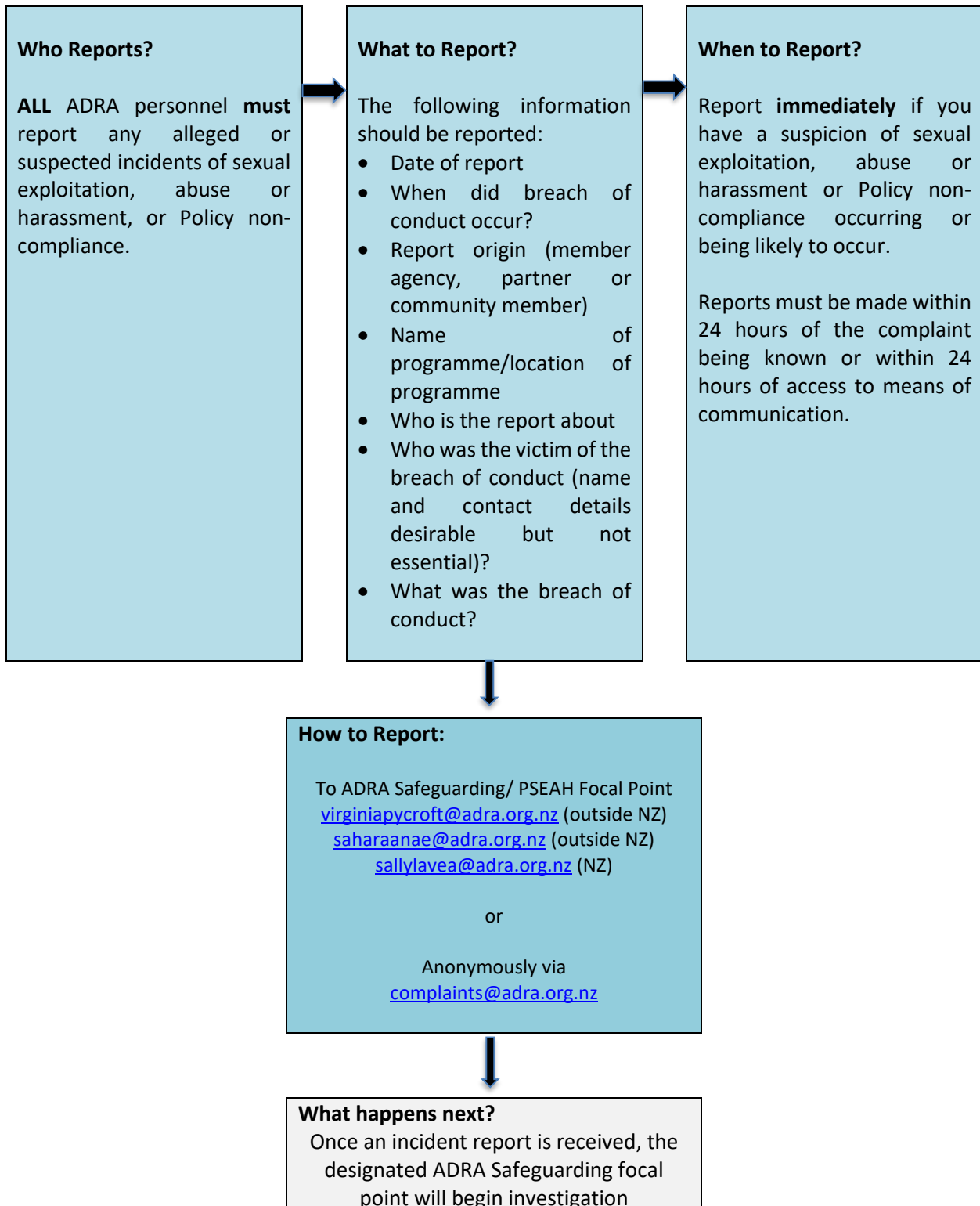
PART B – Safeguarding Officer to complete

Date received by ADRA Safeguarding Officer:

1. When did the breach of conduct occur?
2. Report origin (member agency, partner or community member)
3. Name of program/location of program
4. Who is the report about?
5. Who was the victim of the breach of conduct (name and contact details desirable but not essential)?
6. What was the breach of conduct?
7. Was this complaint investigated? Yes/No
8. If No, why not?
9. Is there evidence or suspicion of a breach of conduct? Yes/No
10. If No, what is the next step you will take?
11. If Yes, what disciplinary action or further investigation will take place?
12. What is the final outcome of this complaint?
13. Report submitted to ADRA? Yes/No
14. Date of completion:



ANNEX E - ADRA Safeguarding/ PSEAH Reporting Process





ANNEX F – ADRA Safeguarding/ PSEAH Response Process

