

Policy title	<b>Protection from sexual exploitation, abuse and harassment (PSEAH) policy</b>
Policy number	EP007
Owner	Managing Director
Date effective	01 July 2025
Date of next review	30 June 2028

**To report a safeguarding concern, you can:**

- Contact Estuari’s Safeguarding Focal Point at [safeguarding@estuari.org](mailto:safeguarding@estuari.org)
- Contact any director or staff member, who will follow Estuari’s established reporting procedure

## 1 Purpose

In keeping with its vision and values, Estuari is committed to ensuring the safety and well-being of all people engaged with or affected by its operations and programs. We recognise the trust that communities and partners place in us, and commit to holding our organisation, its people and its partners to the highest standards of personal and professional conduct. Estuari is committed to ensuring that our workplaces and activities remain free from sexual exploitation, abuse and harassment.

This policy articulates the responsibility of all Estuari People to limit the risk and incidents of sexual exploitation, abuse and harassment at its places of work and in connection with its activities.

This Policy also sets out Estuari’s response to reports of Sexual Harm perpetrated by or against staff, or persons engaged in Estuari’s activities.

## 2 Scope

This policy applies globally, both during and outside normal working hours, to:

- All Estuari People, being all directors, employees, contractors, consultants, volunteers, and members of Estuari, irrespective of location
- Related Personnel, including suppliers (including contractors, sub-contractors and sole traders) and partner organisations who provide services or collaborate with Estuari in connection with any Estuari activity. For the purposes of this policy, Related Personnel also includes visitors to Estuari places of work or Estuari-supported activities.

This policy still applies in the event that it is more rigorous than local laws.

### 3 Policy statement

#### 3.1 Zero tolerance

Estuari has zero-tolerance for inaction against sexual harassment, exploitation, and abuse. Estuari supports the right of all people to live free of sexual violence and any abuse of power regardless of age, gender, sexuality, sexual orientation, disability, religion or ethnic origin. We recognise that there are unequal power dynamics across the organisation and in relation the people it serves, and that people exploiting their position of power for personal gain is a continual risk.

Estuari will not tolerate its directors, employees, contractors, consultants, volunteers, members or any other representative of Estuari associated with its activities carrying out any form of sexual harassment, sexual exploitation or sexual abuse, irrespective of work hours or location. Estuari commits to supporting survivors and the continual improvement of its safeguarding capacity, reporting, investigations, responses to, and prevention of sexual exploitation, abuse and harassment.

#### 3.2 Principles

Estuari commits to six core principles derived from the UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse.<sup>1</sup> (ST/SGB/2003/13), as follows:

- Principle 1:** Sexual exploitation and abuse by Estuari People and Related Personnel constitute acts of gross misconduct and are, therefore, grounds for termination of employment or contract/agreement. Sexual harassment by Estuari People and Related Personnel is grounds for disciplinary action up to and including dismissal.
- Principle 2:** Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of the majority or local age of consent. Mistaken belief in the age of the child is not a defence.
- Principle 3:** Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour by Estuari People and Related Personnel is prohibited at all times. This includes buying sex or the exchange of assistance that is due to program participants.<sup>2</sup>
- Principle 4:** Sexual relationships between Estuari People (and Related Personnel) and community members we work with are forbidden. Such relationships may be based on inherently unequal power dynamics and undermine the credibility and integrity of Estuari's work. Estuari people and Related Personnel must declare any previously existing relationships with community members we work with to their line manager or HR focal point.
- Principle 5:** Where an Estuari Person or Related Personnel develops concerns or suspicions regarding sexual abuse or exploitation or sexual harassment by a colleague, within Estuari or otherwise, they must immediately report such concerns via the established reporting mechanisms.
- Principle 6:** Estuari People and Related Personnel are obliged to create and maintain an environment that prevents sexual exploitation, abuse and harassment, as well as any form of child abuse, and

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<sup>1</sup> UNSG (2003) [UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse \(ST/SGB/2003/13\)](#), accessed 29 June 2025.

<sup>2</sup> Estuari does not make judgment toward individuals who participate in selling sex in exchange for money, gifts or other means of support ('transactional sex'). However, this policy ban on Estuari People buying sex is in place to proactively prevent sexual exploitation and abuse from occurring.

promote the implementation of this policy. Estuari Managers at all levels have a particular responsibility to support and develop systems which maintain this environment.

### 3.3 Commitments

In active pursuit of the principles listed above, Estuari is dedicated to fulfilling the following commitments to prevent and respond to sexual exploitation, abuse and harassment:

(a) **A safe, respectful and inclusive organisational culture:**

Estuari will make every effort to create and maintain a safe, equitable, and inclusive organisational culture where all those who work for and with Estuari as well as those in the communities where Estuari operates are treated with dignity and their rights and voices are heard and respected.

(b) **Privacy, confidentiality and transparency:**

Estuari ensures all Disclosures and Reports of Sexual Harm are handled with utmost confidentiality and respect for the privacy of all parties involved. Disclosure/report records may be shared confidentially with appropriate personnel at Estuari or external authorities on a strict need to know basis, as part of Estuari's duty of care obligations, or as required by law.

Where possible, and subject to the requirements of procedural fairness and the law, Estuari will open opportunity for the relevant parties to discuss how the matter may be resolved. Where possible, Estuari will prioritise the reporting person's privacy and wellbeing; respect their preferences; and design investigations to minimise harm.

(c) **Reporting sexual exploitation, abuse and harassment:**

- (i) Ensure the availability of multiple channels for Estuari People, Related Personnel, people we work with, and others in the community to safely report sexual exploitation, abuse and sexual harassment. These channels should be designed in consultation with local communities and staff to ensure that they are safe and accessible.
- (ii) Ensure that Estuari People, Related Personnel and the communities we work with have information about how to access safe reporting channels, including in forms suitable for children and people of other diversities. This should include making available reporting procedures in local languages and regularly explaining these channels.
- (iii) Provide training and information to all Estuari People and Related Personnel, particularly focal points for receiving complaints, to ensure they understand their obligations and how to discharge their duties should they receive a complaint. A particular emphasis should be made on confidentiality and respect for the wishes of people making a report.

(d) **Reporting to donors and regulators:**

Oxfam is committed to comply with its obligations to inform donors, regulatory and legal authorities of misconduct. In so doing, Estuari will balance its reporting obligations relating to the 'do no harm' principle, a survivor-centred approach and its obligations relating to privacy, confidentiality and informed consent.

If a safeguarding incident occurs within the delivery of a grant funded program or any other activity with contractual reporting requirements, the incident must be reported in line with the contract.

(e) **Embedding protection from sexual exploitation, abuse and harassment:**

- (i) **Safer Recruitment:** In compliance with applicable laws, Estuari is committed to prevent perpetrators of SEAH from being hired, (re)hired or (re)deployed within Estuari or from moving between organisations undetected. Managers and recruiters will ensure robust recruitment screening processes, including but not limited to:
- Pre-screening using Criminal History Checks or similar for all Estuari People. As part of this, all application forms, interviews and references must address Safeguarding and equality requirements and attitudes.
  - Estuari participates in the Misconduct Disclosure Scheme.<sup>3</sup> As such, Estuari is committed to the systematic bilateral sharing of SEAH misconduct data between recruiting organisations and previous employers. This includes providing Statement of Conduct information for previous personnel as requested by hiring organisations participating in the Misconduct Disclosure Scheme.
- (ii) **Safe Partnership Agreements:** Estuari will ensure that, when engaging in partnerships, sub-grant or sub-recipient agreements, these agreements:
- Incorporate this Policy as an attachment
  - Include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to abide by a Code of Conduct that is pursuant to the standards of this Policy
  - Expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against sexual exploitation and abuse and sexual harassment, to investigate and report allegations thereof, or to take corrective actions when SEAH has occurred, shall constitute grounds for Estuari to terminate such agreements.
  - Estuari will include assessments on partner capacity including existing Safeguarding policies, procedures and training. Where not in place, Estuari will provide or facilitate the required capacity building and support as part of entering in to any new partnership.
- (iii) **Accountability to the Communities we work with:** Estuari commits to promoting accountability towards the communities we work with by:
- Being transparent about Estuari programming, activities, and services
  - Raising awareness about Estuari's Code of Conduct, safeguarding policies, and reporting channels available
  - Actively seeking feedback from communities on Estuari's work, the behaviour of Estuari People and Related Personnel, and complaints
  - Offering regular updates to communities on changes resulting from community feedback.
- (iv) **Safe Programming:** Estuari People Related Personnel are required to take proactive measures to avoid causing inadvertent harm to civilians, contribute to actively reduce existing threats and ensure programmes are conflict sensitive. This includes embedding

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<sup>3</sup> Misconduct Disclosure Scheme (n.d.) [Misconduct Disclosure Scheme](#), accessed 18 April 2026.

good practice PSEAH measures throughout Estuari programs and activities, including in project design, proposals, assessments, complaints and feedback mechanisms, and monitoring, evaluation and learning.

- (v) **Safeguarding Risk Management:** Risk management processes for all Estuari programs and activities must include PSEAH risk analysis during the design phase. Safeguarding risks should be assessed, controls documented, and mitigations measures implemented to reduce these risks. Risk assessments must be regularly reviewed and updated, with high risks escalated as per Estuari's established risk management framework.

## 4 Roles and responsibilities

### 4.1 Senior Leadership

Members of Estuari's senior leadership are expected to:

- Monitor the environments in which Estuari operates and consider relevant risk factors to ensure appropriate standards of conduct are observed
- Identify, address and educate where possible about behaviour that enables or condones sexual exploitation, abuse and harassment.

### 4.2 Recruiters

Recruitment managers are responsible for ensuring the policy:

- Aligns with relevant legislation, government policy and / or Estuari requirements
- Remains suitable, adequate and effective
- Is implemented and monitored
- Is reviewed to evaluate its continuing effectiveness.

### 4.3 All Estuari People and Related Personnel

All personnel, irrespective of seniority or experience, must:

- Ensure a safe, respectful, and inclusive environment
- Refrain from engaging in or condoning any form of sexual exploitation, abuse or harassment
- Report or seek advice when they observe or are aware of any sexual exploitation, abuse or harassment irrespective of location of work.

## 5 Further support

If you require more detail or operational knowledge in relation to this policy and any of these topics, please refer to the Estuari Child Safety and Wellbeing Handbook or contact the safeguarding focal point at [safeguarding@estuari.org](mailto:safeguarding@estuari.org)

## 6 Definitions

Term	Definition
Child	A person under the age of 18 years.
Code of conduct	Estuari Code of Conduct
Complainant	The person who raises a complaint (this may or may not be the survivor).
Estuari People and Related Personnel	Estuari People refers to all directors, employees, contractors, consultants, volunteers, and members of Estuari, irrespective of location.  As an extension of Estuari People for the purposes of this policy, Related Personnel includes suppliers (including contractors, sub-contractors and sole traders) and partner organisations who provide services or collaborate with Estuari in connection with any Estuari activity. For the purposes of this policy, Related Personnel also includes visitors to Estuari places of work or Estuari-supported activities.
Safeguarding	All actions an organisation takes to ensure the safety and wellbeing of those engaging with or impacted by the organisation.
Sexual abuse	The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes forced marriage, sexual slavery, and sexual activity with a child (any person under the age of 18).
Child sexual abuse	When a child is used by another child, adolescent or adult for their own sexual stimulation or gratification. Sexual abuse involves contact and non-contact activities and encompasses all forms of sexual activity involving children, including exposing a child to online child sexual exploitation material, or taking sexually exploitative images of children.
[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. Estuari recognises that the terms sexual abuse and exploitation represent a wide spectrum of behaviours and is not limited to the act of sexual intercourse.
[Sexual] Harassment	Sexual harassment is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another. Such conduct is also be considered sexual harassment when it interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. While typically involving a pattern of behaviour, harassment can take the form of a single incident. Sexual harassment may occur between persons of any gender.
Subject of Complaint / Subject of Concern (SoC)	The person against whom an allegation, complaint or concern has been raised.
Survivor	The person who it is alleged has been the subject of sexual harassment, abuse or exploitation.

## 7



## 8 Version history

Version	Date of approval	Summary of updates
1.0	01 July 2025	Approved.
1.1	18 April 2026	Added participation in the Misconduct Disclosure Scheme.