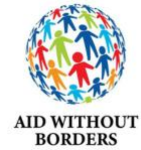


# Prevention of Sexual Exploitation, Abuse and Harassment Policy (PSEAH)



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## 1. INTRODUCTION

### 1.1. Purpose

Aid Without Borders (AWB) is committed to protecting the rights and dignity of children and vulnerable adults, regardless of gender, race, country of origin, religious believe, age, displacement, caste, gender, gender identity, sexual orientation, poverty, class or socio-economic status. Vulnerable adults and children are particularly at risk of Prevention of Sexual Exploitation, Abuse and Harassment. This policy formally expresses AWB's commitment to the protection of vulnerable adults and children from Sexual Exploitation, Abuse and Harassment (SEAH) involving AWB Employees and Related Personnel.

AWB has a zero-tolerance policy toward SEAH concerning all vulnerable groups. AWB takes all its SEAH concerns and complaints involving its employees and related personnel very seriously. This policy has been developed to provide a practical guide for all employees and related personnel in AWB for the prevention of Prevention of Sexual Exploitation, Abuse and Harassment across all of AWB's aid and development programs. This policy will outline a range of risk management strategies that will be enforced and implemented to reduce the risk of vulnerable people being harmed.

This policy sends a clear message that the sexual exploitation of vulnerable adults and children is not tolerated in AWB and attracts disciplinary and commercial sanctions, as well as criminal penalties under National and International laws and sanctions.

### 1.2. Policy Scope

This policy applies to all employees and related personnel of AWB. This includes all employees of AWB, AWB Members, AWB Field Partners and AWB Country Offices. The term also includes board members, volunteers, interns, and international and local consultants, in addition to individual and corporate contractors of these entities and related personnel. This also includes non-AWB entities and their employees and individuals who have entered into partnership, subgrant or sub-recipient agreements with AWB.

### 1.3. Definitions

The following terms are used in this policy document and are defined as follows:

- **Beneficiary:** A person who receives assistance as part of humanitarian relief or development programs.
- **Child and young person:** A child or young person is regarded to be any person under the age of 18 years, unless a nation's laws recognise adulthood earlier.

- **Focal point** person designated to receive complaints of cases of sexual exploitation and sexual abuse.
- **Gender-based violence (GBV):** An umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially-ascribed (gender) differences between males and females.
- **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 (in the law of the host country or under Australian Capital Territory law [16 years], whichever is greater) is considered to be 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 staff and personnel.
- **Sexual exploitation:** any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, threatening or profiting monetarily, socially or politically from the sexual exploitation of another.
- **Vulnerable adults:** those aged over 18 years and who identify themselves as unable to take care of themselves/ protect themselves from harm or exploitation; or who, due to their gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.
- **Victim:** the person who is sexually exploited or abused. This term not meant to imply a lack of strength, resilience or capacity to survive.
- **Witness:** any person giving testimony or evidence in the investigation, including but not limited to the victim, the complainant, a beneficiary, a staff member of a partner agency, the subject of the complaint or another AWB staff member.

## 2. POLICY & PROCEDURES

### 2.1. Guiding Principles

This policy sets the minimum standards to be followed by all AWB Employees and Related Personnel to protect programme beneficiaries and communities from Prevention of Sexual Exploitation, Abuse and Harassment and child abuse by AWB Employees and Related Personnel.

The need for the following guiding principles (which have been adopted from the UN IASC Task Force on Preventing Sexual Exploitation/ Abuse in Humanitarian Crisis (2002)) flows from a recognition that AWB's work puts its Employees and Related Personnel in positions of power in relation to the communities that AWB executes its aid and development projects, especially vulnerable adults and children. AWB Employees and Related Personnel have an obligation to use their power respectfully and must not abuse the power and influence they have over the lives and wellbeing of the beneficiaries involved in the projects.

Any violation of these principles is a serious concern and may result in disciplinary action, up to and including dismissal, in accordance with disciplinary procedures. All AWB Employees and Related Personnel must sign these principles. Employees and individuals who are non-AWB must also ensure that they sign these following core guiding principles:

1. Prevention of Sexual Exploitation, Abuse and Harassment by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment;
2. Sexual activity with children (person under the age of 18) is prohibited regardless of the age of consent locally. Mistaken belief in the age of the child is not a defence;
3. Exchange of money, employment, goods or services for sex, including favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes the exchange of assistance that is due to beneficiaries.
4. Sexual relationships between AWB staff members 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 AWB member of staff develops concerns or suspicions regarding sexual abuse or exploitation by a fellow member of staff, whether in AWB or not, s/he must report such concerns via the prescribed procedure.
6. AWB workers are obliged to create and maintain an environment which prevents Prevention of Sexual Exploitation, Abuse and Harassment and promotes the implementation of these principles.
7. Sensitive information related to incidents of Prevention of Sexual Exploitation, Abuse and Harassment or child abuse whether involving colleagues, program participants or others in the communities in which AWB works shall be shared only with enforcement authorities and AWB agents and employees of the appropriate seniority or function who have a need to know such information. Breach of this policy may put others at risk and will therefore result in disciplinary procedures.
8. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

In addition to the principles above, all AWB Employees and Related Personnel must understand and sign AWB's Child Protection Code of Conduct (see ANNEX 1). (See AWB's Child Protection policy POL-OPS-CPP for more information).

### **Principle 1: Zero tolerance of inaction**

Sexual exploitation, abuse and harassment are never acceptable. AWB recognises that achieving a significant reduction in SEAH is a long-term endeavour. Zero tolerance is not the same as zero incidents. Reports of incidents may increase as AWB improves safeguards.

Increasing reports may indicate growing awareness of SEAH and changing attitudes, with victims/survivors feeling more comfortable to report and AWB more likely to take action. The reporting of incidents and responses is an indicator that the risk of SEAH is being managed appropriately.

For this Policy, AWB defines zero tolerance as acting on every allegation in a fair and reasonable way with due regard for procedural fairness.

### **Principle 2: Strong leadership accelerates culture change**

Culture change is underway in many organisations. Strong leadership is essential for accelerating the pace of change. AWB management sets organisational culture. AWB expects its leaders to set clear expectations and model respectful behaviour in their interactions at work. This will support communities, victims/survivors and whistleblowers to feel safe, report concerns and be assured their allegations are taken seriously.

Strong leaders address SEAH by taking measures to improve diversity and inclusion. Diverse and inclusive organisations have lower levels of harassment and discrimination. This can include strong, actionable human resource procedures that embed gender equality and PSEAH; inclusion of PSEAH discussions on board meeting agendas; having senior champions responsible for PSEAH and encouraging staff gender balance particularly in senior roles. Leaders should encourage scrutiny of their own behaviour and that of senior management.

### **Principle 3: Victim/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
- does not discriminate based on gender, age, race/ethnicity, ability, sexual orientation, or other characteristics
- considers the need for counselling and health services to assist the victim/survivor with their recovery.

### **Principle 4: Preventing Sexual Exploitation, Abuse and Harassment is a shared responsibility**

Preventing Sexual Exploitation, Abuse and Harassment is everyone’s responsibility at AWB. It requires the commitment, support and investment of its partners for this Policy to be effective.

### **Principle 5: Gender inequality and other power imbalances are addressed**

Available data indicates that the majority of SEAH victims/survivors are female, and the majority of 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 intended beneficiaries 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 is a failure of responsibility. Strong reporting allows AWB to better monitor SEAH, understand risks, improve assurance and work with other stakeholders to improve systems and safeguards accordingly. Reporting will also help to focus organisations on the issue by providing a regular prompt that PSEAH is a core obligation of their work.

## **2.2. Recruitment and Screening Procedures**

Recruitment and screening of personnel and associates must reflect AWB’s commitment to protect vulnerable adults and children by ensuring checks and procedures are in place to screen out anyone who may pose a SEAH risk to AWB’s beneficiaries. AWB has a robust recruitment and screening process for all personnel and associates which are strictly implemented, these include, and are managed through the following protocols and conditions:

1. AWB only designates appropriately trained, knowledgeable, and accountable personnel to be responsible for recruitment and hiring of employees and consultants. These personnel must be trained in human resources, knowledgeable about the risks of staff misconduct regarding Gender based violence (GBV), including SEAH, and held accountable for implementing internationally recognized standards in hiring practices.
2. When recruiting local and international staff, including short-term consultants, interns, and volunteers, careful hiring practices must include reference checks for all categories of employee. AWB does not hire any person with a history of perpetrating any type of GBV, including SEAH or domestic violence.
3. Targeted/behavioural based interview questions must be used to determine attitudes, motivations, and values in regard to children and vulnerable adults and working with them.
4. Reference check to include questions regarding any concerns about candidate’s conduct when working or interacting in a position of authority and power.

These procedures must be evidenced by:

- a) Documented criminal record checks for personnel and associates in contact with children
- b) Documented verbal referee checks
- c) Interview plans incorporating behavioural-based interview questions that are specific to positions that involve working with children
- d) Documented request for an applicant to disclose whether they have been charged with child exploitation offences and their response.

All applicants are required to truthfully answer standard questions concerning any existing history of criminal verdicts, questions about disciplinary measures or sanctions imposed by any existing or former employer of the applicant. AWB treats the disclosure of inaccurate or incomplete information with regards to any acts of SEAH as misconduct.

AWB reserves the right to withdraw any offer of employment or to terminate any contractual engagement if the applicant is found to have provided untruthful information concerning any condemnation regarding acts of SEAH.

AWB will maintain a record of staff members found to have been convicted for acts of SEAH or who have received a disciplinary measure or sanction imposed by any existing or former employer.

AWB reserves the right to disclose information about acts of SEAH on record concerning an individual staff member if so, requested by another governing body, NGO agency or other third party in a selection process.

## 2.3. SEAH Complaint Procedures

With all SEAH complaints, the following complaint referral chart must be followed:

### START

- | 1. Complaint received by AWB via established reporting channels,
- | including designated focal points.
- |
- | 2. Concern forwarded to the AWB Designated Manager / Focal Point
- | → Complaint Referral Form completed.
- | → In parallel, matter is discussed with the Designated Senior HQ
- | Manager / Focal Point.
- |
- | 3. Concern discussed with Human Resources at headquarters and
- | next steps agreed.
- |
- | → 3A. Complaint concerns a breach of the AWB Staff Code of Conduct
- |
- | Determine if an initial inquiry is needed to gather further facts.



- | | — If No inquiry needed → No Further Action (case closed).
- | | — If inquiry or evidence indicates a case to answer → proceed
- | | to Formal Investigation.

—► 3B. Complaint concerns serious or potentially criminal behaviour by  
other NGO staff / field partner

- |
- | Convene a Strategy Meeting with senior AWB staff and any
- | relevant external actors → agree an Action Plan.

| 4. Formal Investigation launched; investigation team appointed and  
| Witness Protection Plan put in place.

- | Investigation activities may include (often in parallel):
- | — Liaise with local police or other competent authorities.
- | — Decide on interim measures (e.g., disciplinary action, suspension).
- | — Interview women, children, staff and the subject of the complaint.

| 5. Investigation concludes → Final report and recommendations issued.

## END

In the event where a staff member is receiving an SEAH-related complaint, s/he must ensure the following:

- a) React calmly and listen carefully to what is being said.

- b) Reassure the complainant that he or she was right to raise the concern.
- c) Address issues of confidentiality explaining that there are limits to ensuring confidentiality to the extent that staff members are obliged to report complaints, while reassuring the complainant that information will only be shared on a “need to know” basis
- d) Take what is said seriously - the ‘unthinkable’ is possible.
- e) Avoid asking too many questions: Ask only the number of questions required to gain a clear understanding of the complaint so that it can be passed on via AWB’s reporting procedures.
- f) Ensure that his/her safety is not at risk.
- g) Consider his/her need for medical attention.
- h) Inform him/her of the next steps in the procedure.
- i) Make a written record of what has been said via the complaint referral form (See ANNEX 2) at a minimum, a signed and dated record of the complaint should be made at the earliest opportunity.
- j) Report on the complaint, as per the agency reporting procedure at the earliest opportunity.

In the case where someone outside of AWB wishes to make a SEAH complaint, they must follow AWB’s Complaints Policy (see AWB’s POL-GOV-CGP)

## **2.4. SEAH Investigation Procedures**

There are several core principles that must be ensured in the investigation procedure, they are:

- Thoroughness: investigations must be conducted in a diligent, complete and focused manner.
- Confidentiality: complainants, witnesses and the subject of allegations have a right to confidentiality other than in certain, exceptional circumstances.
- Safety paramount: the safety and welfare needs of the victim/survivor and/or complainant are paramount.
- Competent, responsible, independent investigators: people conducting investigations and preparing reports should be responsible, independent and have received training.
- Impartiality: investigations must be conducted in a fair and equitable way. Investigators must be free of any influence that could impair their judgement.
- Objectivity: evidence to support and refute the allegation, must be gathered and reported in an unbiased and independent manner
- Timelines: investigations must be conducted and reported in a timely way
- Accuracy and documentation: investigation reports and their conclusions must be supported by adequate documentation.

Upon receipt of a complaint, a decision needs to be made as to whether to proceed immediately to a full investigation or conduct a preliminary investigation. In cases where multiple agencies are implicated in the complaint, all such agencies must be involved in deciding the nature and scope of the investigation and consideration given to conducting a joint investigation as appropriate.

The aims of a preliminary investigation are to gather relevant data and ensure that the immediate needs of all concerned are met. The presumption should be that an investigation will be instigated (without recourse to a preliminary investigation) unless the complaint is sufficiently vague to merit further clarification before a decision can be reached. The fact that a complaint lacks clarity, or occurs within a specific context does not constitute grounds for treating it less seriously than other complaints.

The senior person, usually AWB's Executive Managers, CEO and/or Board, should establish whether the subject had had prior complaints made against him as multiple complaints could provide a compelling case for proceeding to an investigation. (This requires the maintenance of good personnel records and documentation of concerns.)

It may also entail a brief interview with complainant/ victim(s)/ others. This should be aimed at establishing whether grounds exist to proceed, not to elicit substantive detail.

It is essential that those involved in preliminary investigations guard against closing down the investigation process too quickly. To this end, the presumption should be that an investigation should take place unless the preliminary investigation finds that there are no grounds to proceed. The following Steps are to be taken during a SEAH investigation by AWB.

## START

- | 1. Allegation received (any staff, partner, beneficiary or third-party report)
- |
- | —▶ A. \*Immediate survivor support\*
- |     | — Refer survivor for appropriate medical, psychosocial or legal services.
- |
- | —▶ B. \*Notification & registration\*
- |     | — Details sent to the named Senior AWB staff member in line with the
- |     |     Complaints Protocol; case logged in confidential database.
- |
- | 2. Preliminary assessment
- |     | — If \*\*no cause for concern\*\* → No further action.
- |     |     ▶ If complaint appears malicious, consider proportionate response.
- |     | — If concerns remain → proceed to step 3.

1

- External reporting obligations considered.

· Redeployment or suspension of the subject of complaint considered to protect all parties.

1

| 3. Investigation initiated

— Investigation team appointed (gender-balanced where possible).

| — Investigation plan drafted & approved.

— Safety/health/support needs of victim/complainant reviewed.

1

4. Do the allegations constitute a potential crime?

└ Yes → Hold a discussion with survivor on reporting options.

If appropriate, \*\*AWB refers the case to law-enforcement\*\*.

- Decide whether to postpone the administrative investigation.

- If postponed, continue survivor-support activities.

1

No or investigation proceeds  $\rightarrow$  step 5.

1

## 5. Administrative investigation

— Interviews conducted (survivor, witnesses, subject).

| — Documentary/other evidence gathered.

— Ongoing review of survivor/staff safety & welfare.

|

| 6. Investigation concluded

|     └─ Report compiled and submitted to named Senior AWB staff.

|

| 7. Findings

|     └─ **\*\*Breach identified\*\***

|     |     ▸ Disciplinary action determined (up to dismissal).

|     |     ▸ Mandatory external reporting completed (e.g., donors, regulators).

|     |     ▸ Case file &amp; database updated.

|     └─ **\*\*No breach identified\*\***

|         ▸ Subject reinstated (if previously suspended).

|

| 8. Closure &amp; communication

|     └─ Subject formally informed of outcome.

|     └─ Survivor informed of outcome and offered ongoing support.

|

**END**

## **2.5.     Training Procedures**

All permanent, maximum term and casual staff and Board Members of AWB must be trained on how to respond and report a SEAH incident. This training will enable staff to be aware of the ethical values referred to in the current policy, specifically with respect to vulnerable situations.

Also, staff will become aware of suspicious situations, as well as recognize the signs of SEAH, and provide practical information on how to assist victims of SEAH, if signs of SEAH are identified or if a victim approaches them to complain about SEAH.

A roster of trained investigators is essential. AWB will consider the training of a SEAH investigator who have investigative experience – typically human resources staff or internal auditors – and/or those with GBV or protection experience, among others. Use of a professional with relevant experience and skills in counselling may also be recommended. Any staff who serve as investigators must be able to maintain a high level of confidentiality.

In addition to trained investigators, AWB should appoint at least one senior manager – or a team of managers – to provide oversight and monitoring of investigations. These staff members should be trained accordingly. The 'Building Safer Organisations (BSO) Handbook: Training Materials on Receiving and Investigating Allegations of Abuse and Exploitation by Humanitarian Workers', December 2006 contains materials regarding PSEAH training program, including slides, hand-outs, and facilitator's notes that will be used by AWB as a tool for training teams of managers to deal with SEAH reporting and investigation.

International AWB Field Partners who do, or may, have direct contact with children and vulnerable adults, also need to be inducted with AWB's PSEAH Policy through inductions/workshops- which may be held either face-to-face, by Skype or phone conference – at which this Policy, its importance and consequences of non-compliance, will be presented to the Partner Organisation's executive and relevant staff, volunteers and contractors.

## ANNEX 1: Child Protection Code of Conduct

Staff members and others are responsible for maintaining a professional role with children, which means establishing and maintaining clear professional boundaries that serve to protect everyone from misunderstandings or a violation of the professional relationship. All staff should conduct themselves in a manner consistent with their role as an AWB representative and a positive role model to children. AWB has developed a child safe code of conduct to protect children, staff and the organisation by providing clear behavioural guidelines and expectations. AWB's child safe code of conduct includes:

### **I WILL:**

- (a) Treat all children and young people in our program with respect.
- (b) Conduct myself in a manner that is consistent the values of AWB.
- (c) Provide a welcoming, inclusive and safe environment for all children, young people, parents, staff and volunteers.
- (d) Respect cultural differences.
- (e) Encourage open communication between all children, young people, parents, staff and volunteers and have children and young people participate in the decisions that affect them.
- (f) Report any concerns of child abuse.
- (g) At all times staff should be transparent in their actions and whereabouts.
- (h) Take responsibility for ensuring they are accountable and do not place themselves in positions where there is a risk of allegations being made.
- (i) Self-assess their behaviours, actions, language and relationships with children.
- (j) Speak up when they observe concerning behaviours of colleagues.

### **I WILL NOT:**

- (a) Engage in behaviour that is intended to shame, humiliate, belittle or degrade children.
- (b) Use inappropriate, offensive or discriminatory language when speaking with a child or young person.
- (c) Do things of a personal nature that a child can do for him/herself, such as assistance with toileting or changing clothes.
- (d) Take children to their own home/hotel or sleep in the same room or bed as a child.
- (e) Smack, hit or physically assault children.
- (f) Develop sexual relationships with children or relationships with children that may be deemed exploitative or abusive.
- (g) Behave provocatively or inappropriately with a child.
- (h) Participate in the treatment of children that is illegal, unsafe or abusive.
- (i) Act in a way that shows unfair and differential treatment of children.
- (j) Photograph or video a child without the consent of the child and his/her parents or guardians (medium (see also 'Use of children's images for work-related purposes' below)
- (k) Hold, kiss, cuddle or touch a child in an inappropriate, unnecessary or culturally insensitive way.
- (l) Seek to make contact and spend time with any child or young person outside the program times.

- (m) Use AWB's computers, mobile phones, video and digital cameras inappropriately, nor use them for the purpose of exploiting or harassing children.

I, \_\_\_\_\_ (Full name as shown on photo ID) as undersigned below, have read and understood and hereby agree to abide by this Prevention of Sexual Exploitation, Abuse and Harassment Policy and Child Protection Code of Conduct.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_.



## ANNEX 2: AWB PSEAH COMPLAINT / REFERRAL FORM

**STRICTLY CONFIDENTIAL** – To be completed by the designated focal point or investigator. All information must be handled in line with AWB's Prevention from Sexual Exploitation, Abuse & Harassment (PSEAH) Policy.

### 1 Survivor Consent

- Has the survivor given informed consent to complete and submit this form? ☐ YES ☐ NO
- If no, reason: \_\_\_\_\_

### 2 Survivor / Victim Details (if different from Complainant)

Full Name	
Age	
Sex	
Nationality / Ethnicity	
Address / Contact	
Identity / Passport No.	
Parent / Guardian Name & Address (if under 18)	

### 3 Incident Details

Date	Time	Location	Country

### Brief Description of Incident

--

**Physical / Emotional State of Survivor** (injuries, behaviour, mood)

**Witness Names & Contact Information****4 Accused Person(s)**

Name	Job Title / Role	Organisation	Sex / Age

**Address / Contact Details (if known)****Physical Description****5 Complainant Details (if not the Survivor)**

Name	Relation to Survivor	Contact Details	Nationality / Ethnicity

**6 Police & Medical Information**

1. Has the survivor contacted the police? ☐ YES ☐ NO

- If yes, provide details of police action: \_\_\_\_\_
- 2. If no, does the survivor want police assistance? ☐ YES ☐ NO
  - Reason: \_\_\_\_\_
- 3. Has the survivor been informed about available medical treatment? ☐ YES ☐ NO
- 4. Has medical treatment been sought? ☐ YES ☐ NO
  - Provider / Diagnosis / Prognosis: \_\_\_\_\_

## 7 Safety & Immediate Measures

- Immediate security / welfare measures undertaken for survivor:
- Referrals made (health, psychosocial, legal) and advice given:

## 8 Additional Information

Any other relevant information (e.g., contact with other organisations):

## 9 Report Submission & Sign-Off

- Date report forwarded to AWB PSEAH Focal Point: \_\_\_\_\_
- Date received by PSEAH Focal Point: \_\_\_\_\_

Name	Position	Signature

## 10 Data Sharing Consent

Complainant consents for data to be shared with (tick all that apply):

☐ Police ☐ Community Services ☐ Camp Leader ☐ Community  
Services Other: \_\_\_\_\_

**11 Form Completed By**

Name	Position / Organisation	Date & Time	Location

**Confidentiality Notice**

This form and any attachments must be stored securely in a restricted-access folder. Do **not** email or otherwise transmit this document unencrypted. Handle and dispose of all data in accordance with AWB Data Protection Policy.