



PSEAH POLICY

INTRODUCTION

Pagoda Projects is committed to safeguarding and preventing Sexual Exploitation, Abuse and Sexual Harassment (SEAH) of any kind. It is our policy to apply a zero tolerance approach to PSEAH not only within our own organization and global offices, but also extend this requirement to ensure our stakeholders and those involved in Pagoda Projects' wider business operations are also compliant. It is therefore Pagoda Projects' responsibility to ensure that adequate prevention measures and incident reporting procedures, which also adhere to the requirements of our funding partners, are in place.

KEY DEFINITIONS

The policy uses the following UN definitions for SEAH:

Sexual Exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. Includes profiting momentarily, socially, or politically from sexual exploitation of another. Under UN regulations it includes transactional sex, solicitation of transactional sex and exploitative relationship.

Sexual Abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It should cover sexual assault (attempted rape, kissing / touching, forcing someone to perform oral sex / touching) as well as rape. Under UN regulations, all sexual activity with someone under the age of 18 is sexual abuse.

Sexual Harassment: A continuum of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating.

All these definitions refer to not only physical actions but also online or verbal actions.

SCOPE

Pagoda Projects has zero tolerance towards Sexual Exploitation, Abuse and Harassment. It is expected that all Pagoda Projects employees, participants, and partners are able to fully participate in Pagoda Projects' business operations without the threat of such incidents taking place, as well as having the capacity to acknowledge what constitutes SEAH, and understand how to adequately prevent and report it.

- Pagoda Projects' Staff including global employees and independent staff and affiliates working for Pagoda Projects
- Pagoda Projects' participants who have signed a formal booking form including, Terms & Conditions, Code of Conduct and Behaviour Policy
- Pagoda Projects' University and Government partners and their staff who may or may not have a formal written agreement in place with Pagoda Projects
- Pagoda Projects local partners who may or may not have an agreement in place. This includes, but it not limited to;
 - Internship host companies, membership partners and their staff
 - Language school partners, their staff, and students
 - Accommodation providers and their staff
 - Homestay families

These groups are expected to act in accordance with the procedures and reporting requirements outlined in this policy. They are also reminded of other relevant obligations and policies that may be applied to them including; They are also reminded of other relevant obligations and policies that may be applied to them including but not limited to; [Pagoda Projects' Bullying & Harassment Procedures](#), [Pagoda Projects' Risk Assessment & Escalation Procedures](#), [Pagoda Projects' Child Protection Policy](#) and [Pagoda Projects' Complaints & Grievances Policy](#). Through partnership agreements and terms and conditions, Pagoda Projects will ensure that prevention against SEAH is part of due diligence processes for any partner organisations.



PSEAH POLICY

PRINCIPLES

Principle 1: Zero tolerance of inaction

Sexual exploitation, abuse and harassment are never acceptable. Pagoda Projects recognizes that achieving a significant reduction in SEAH is a long-term endeavour and relies on effective measures being in place for victims/survivors to be able comfortably and confidentially report and organizations to be able to act. Zero tolerance does not mean zero incidents, but increased reporting indicates that risk and safeguarding is being managed appropriately. Pagoda Projects strives towards 100% of incidents being reported through established reporting systems.

Principle 2: Strong leadership accelerates culture change

Pagoda Projects expects its employees to lead by example and set clear expectations and model behaviour for Pagoda Projects' partners and participants to follow. This will allow those involved in Pagoda Projects' business operations to understand the reporting and response measures that are in place so that they can be confident they will be taken seriously in the event of any allegations.

Principle 3: Victim/survivor needs are prioritised

Due to the sensitive nature of SEAH related incidents, Pagoda Projects will prioritise the rights, needs, wishes and confidentiality of the victim/survivor whilst maintaining fairness within the investigative procedures. Pagoda Projects will ensure the victim/survivor is treated without judgement, with dignity, digression and respect. Pagoda Projects will always ensure that the victim/survivor is involved in the decision-making process, provided with the necessary support and recovery measures, and kept comprehensively and transparently informed throughout.

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

Preventing Sexual Exploitation, Abuse and Harassment is a shared responsibility. Pagoda Projects requires the support and cooperation of all their stakeholders to play their part in prevention and reporting for this policy to be effective. All organisations and individuals have a responsibility to implement or follow procedures and guidance to prevent SEAH incidents. They must also deal efficiently and in a sensitive manner with any incidents whilst protecting the privacy and safety of the individual(s) involved.

Principle 5: Gender inequality and other power imbalances are addressed

Incidents of SEAH can be of heightened risk where inequalities and imbalances occur. Pagoda Projects, as per its mission statement, is committed to diversity and inclusion amongst its team, participants and partners and is committed to upholding the values outlined in our [Diversity and Equality Policy](#). Strong measures to improve diversity and inclusion can have positive impact on reduced levels of harassment and discrimination and with a Diversity and Inclusivity champion in place.

Principle 6: Stronger reporting will enhance accountability and transparency

The organisations and individuals who contribute to Pagoda Projects' Business operations are accountable for their actions with regards to this policy. Strong reporting will allow Pagoda Projects to better monitor SEAH incidents, prevent incidents occurring and effectively review measures and policies going forward.

RISK ASSESSMENT

Pagoda Projects' employees will assess the level of risk for SEAH occurring as per the Pagoda Projects Risk Assessment and Escalation Procedures as well as on an individual programme basis.

The Pagoda Projects Ltd. Risk Assessment and Escalation Procedures lays out the decision-making process and steps involved in assessing a SEAH incident, associated risks, and appropriate responses.



PSEAH POLICY

REPORTING

When alleged incidents are reported, Pagoda Projects will work with the individual(s) to track incident management.

Safety, privacy and the well-being of the individual(s) will remain paramount throughout the reporting process; any information shared with Pagoda Projects or related partners will be treated confidentially in line with [Pagoda Projects' Privacy Policy](#) and accessible by authorized persons only within senior management. It may be necessary for Pagoda Projects to reveal some information or facts to external parties involved in the investigation or support process or law enforcement channels.

Pagoda Projects Ltd. expects two kinds of incident reporting:

Mandatory and immediate (within 24 hours of becoming aware of an alleged incident) reporting by all staff and partners of any alleged incident of SEAH

Mandatory reporting (within two working days) by all staff and partners of any alleged policy non-compliance

Who reports?

All Pagoda Projects' staff, partners and individuals as defined under the policy scope must report any alleged incidents of SEAH or policy non-compliance through the correct channels. This includes our internal channels as well as any channels required by our funding partners. For example, the [SEAH Incident Notification Form](#) should be used to report issues directly to seah.reports@dfat.gov.au for programmes delivered on behalf of DFAT via our Australian institutional partners.

What is reported?

Any suspected or alleged cases of SEAH perpetrated by anyone in connection with Pagoda Projects' business operations must be reported. If uncertain, incidents should be reported for investigation to avert potential non-compliance.

How to report?

All reports of alleged SEAH incidents should be made in line with Pagoda Projects' Risk Assessment and Escalation Procedure or Pagoda Projects' Complaints and Grievance Policy. Pagoda Projects will ensure that correct local law enforcement channels are notified if crime is involved in the incident as well as insurance bodies to provide the individual with any necessary support.

NON-COMPLIANCE

All employees, partners and individuals associated with Pagoda Projects' business operations have a role to play in enforcing the policy and are required to deal with any observed or reported breaches. Should any individual feel apprehensive about their own safety in regard to addressing any breach, they should follow [Pagoda Projects' Complaints & Grievance Policy](#).

Pagoda Project's will monitor compliance through a range of approaches including due diligence checks, performance assessments and risk assessment and incident reviews on an on-going basis. Partner organisations are expected to put in place appropriate measures to ensure they can comply with the policy.

Any member of staff, partner, or individual refusing to observe the policy will be liable to either disciplinary action in accordance with Pagoda Projects' Disciplinary Policy or for third parties, termination or suspension of any active agreement.

IMPLEMENTATION OF THE POLICY

Overall responsibility for policy implementation and review rests with Pagoda Projects senior management. However, all employees are required to adhere to and support the implementation of the policy. Pagoda Projects will inform all existing



PSEAH POLICY

employees and partners about this policy and their role in the implementation of the policy. All new employees, partners or individuals will be given notice of this policy within the agreement they sign with Pagoda Projects.

This Policy was approved & authorised by:

Name: Jamie Bettles
Position: Managing Director
Date: 13th October 2020

Signature:

REVIEWING POLICY

This policy will be reviewed and, if necessary, revised in the light of legislative or codes of practice and organisational changes. Improvements will be made to the management by learning from experience and the use of established reviews.

Policy review date: 13th October 2021

POLICY AMENDMENTS

Should any amendments, revisions, or updates be made to this policy it is the responsibility of Pagoda Projects to see that all relevant individuals within the scope of the policy receive written notice via e-mail.

ADDITIONAL INFORMATION

If you require any additional information or clarification regarding this policy, please contact info@pagodaprojects.com. To the extent that the requirements of this policy reflect statutory provisions, they will alter automatically when and if those requirements are changed.

To view all information relating to Pagoda Projects' internal policies and due diligence, please visit our Partner Toolkit at www.pagodaprojects.com/partners.

To view required DFAT policies in relation to PSEAH please visit the Australian Government Website: [DFAT Preventing Sexual Exploitation, Abuse and Harassment](#).