



DOHA PREVENTION OF SEXUAL EXPLOITATION, ABUSE, AND HARASSMENT (PSEAH) POLICY

1. Introduction and Commitment

Door of Hope Australia Inc. (DOHA) has a **zero-tolerance** approach to sexual exploitation, abuse, and harassment. We believe every individual—whether an employee, volunteer, partner, or community member—has the right to be treated with dignity and respect.

DOHA is committed to a survivor-centric approach, ensuring that the safety, rights, and wishes of the person affected are at the centre of our response.

2. Definitions

DOHA uses the following standard international definitions:

- **Sexual Harassment:** Unwanted physical, verbal, or non-verbal conduct of a sexual nature. In Australia, this includes any conduct that a reasonable person would anticipate might offend, humiliate, or intimidate.
- **Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. This includes "Quid Pro Quo" (trading aid or employment for sexual favours).
- **Sexual Abuse:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Sexual Assault:** Any unwanted or forced sexual act committed without consent, including rape and forcible touching.

3. Standards of Behaviour

All DOHA representatives, including Partners and Contractors, must adhere to these minimum standards:

- **Prohibition of Sexual Activity with Children:** Sexual activity with anyone under the age of 18 is strictly prohibited, regardless of local laws or consent.

- **Prohibition of Exchange for Assistance:** It is strictly forbidden to exchange money, employment, goods, or services for sexual favours.
- **Duty to Report:** All staff have a mandatory obligation to report any suspicion or allegation of SEAH. Failure to report is a disciplinary offence.

4. Reporting Procedures

DOHA provides multiple pathways to report concerns. Reports can be made by victims, witnesses, or those with "well-founded concerns."

Formal Approach:

- **Contact the PSEAH Focal Person:** Michelle Harry (mharry@doorofhope.com.au or 03 9584 9531).
- If the complaint involves the Focal Person, report directly to the **Chairperson of the Board**.
- **External Reporting:** DOHA will notify DFAT (within 48 hours for serious incidents) and ACFID as required by our compliance obligations.

5. Survivor-Centric Response

When an allegation is made, DOHA prioritises the survivor's needs:

- **Confidentiality:** Information is shared only with those strictly necessary for the investigation.
- **Support Services:** DOHA will facilitate access to medical, legal, and psychological support (e.g., counselling) regardless of whether a formal investigation proceeds.
- **Safety:** We will take immediate steps to ensure the survivor is safe from further harm or retaliation.

6. Investigation and Disciplinary Action

- **Natural Justice:** Investigations will be fair, unbiased, and conducted by qualified personnel.
- **Disciplinary Action:** Any DOHA employee found to have engaged in SEAH will face immediate disciplinary action, which may include **summary dismissal** (instant termination) and reporting to the police.
- **Partners:** DOHA will immediately suspend or terminate partnerships if a partner fails to investigate or respond appropriately to SEAH allegations.

7. Prevention and Positive Duty

DOHA proactively manages risk by:

- **Vetting:** Rigorous recruitment including "Working with Children Checks" and specific safeguarding questions during reference checks.
- **Training:** Regular induction and refresher training for all staff and partners on power dynamics and PSEAH.
- **Risk Assessment:** Assessing PSEAH risks for every project before implementation.

8. Policy Review

This policy is reviewed every two years. It remains a standing item for the Board of Directors to ensure the organisation maintains a safe and accountable culture.

Last Reviewed: 15th September 2026

Next Review: [Date + 2 Years]