



Empower with an education to prevent sex trafficking

Protection from Sexual Exploitation, Abuse & Harassment (PSEAH) Policy

February 2026

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PROTECTION FROM SEXUAL EXPLOITATION, ABUSE & HARASSMENT POLICY

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INTRODUCTION

Free To Shine is committed to fostering a safe, respectful, and inclusive environment in all aspects of our work. We recognise that sexual exploitation, abuse, and harassment (SEAH) are serious and pervasive risks in the development sector—particularly in contexts of vulnerability, marginalisation, and unequal power dynamics. As an organisation dedicated to advancing child protection and the rights of girls in Cambodia, we hold a zero-tolerance approach to any form of SEAH.

This policy sets out Free To Shine's proactive framework for protecting people from sexual exploitation, abuse, and harassment (PSEAH), guides employees and associates in upholding our shared standards, and articulates our responsibilities in preventing, identifying, reporting, and responding to SEAH concerns. It further affirms our commitment to a victim-survivor-centred and rights-based approach, and ensures compliance with recognised international best practice, the requirements of the Australian Department of Foreign Affairs and Trade (DFAT), and the Australian Council for International Development (ACFID).

Safeguarding against sexual exploitation, abuse, and harassment is a fundamental aspect of Free To Shine's values and mission, as well as a legal requirement. We are dedicated to continuous improvement, and maintaining a culture where everyone's safety and dignity is protected and prioritised.

This PSEAH Policy is intended to be read in conjunction with the Free To Shine PSEAH Procedures. The Policy sets out the organisation's commitments, expectations, and responsibilities, while the PSEAH Procedures provide detailed, practical guidance on how these commitments are put into action in daily work. All employees and associates are required to be familiar with both documents and to follow them together to ensure the highest standards of safeguarding are maintained.

This policy also operates alongside FTS's Child Protection Policy & Procedures, Gender Equality Policy, and other relevant policies.

STATEMENT OF COMMITMENT

Free To Shine (FTS) is firmly committed to the highest standards of ethical and professional conduct in all our work. We hold a zero-tolerance approach to sexual exploitation, abuse, and harassment (SEAH) in any form and by any person associated with our organisation, whether employees, volunteers, partners, contractors, or representatives.

We recognise that development and humanitarian initiatives—particularly in contexts with unequal power dynamics, poverty, and vulnerability—require vigilant, ongoing attention to PSEAH. We are committed to creating and maintaining an environment where all individuals, especially children, women, and those who are marginalised, feel respected, safe, and protected from harm.

Our commitment is guided by our vision, mission, and values, and explicitly extends to safeguarding the rights, wellbeing, and dignity of all stakeholders and communities with whom we work. We do not tolerate behaviour or actions that exploit or abuse positions of power for personal gain, nor any conduct which results in harm, discrimination, or harassment.

We embed safeguarding measures across our programs, partnerships, workplaces, and procurement processes; and ensure that these are accessible and clearly communicated to employees, partners, communities, and victim/survivors in languages and formats they understand; and that avenues for reporting are safe and support victim-survivor-centred responses.

We foster a culture of accountability, gender equity, and inclusion, recognising and addressing power imbalances, and commit to continuous improvement through regular training, risk assessment, and review of policy, procedures and practice.

1. PURPOSE

This policy establishes clear standards to protect from and respond to sexual exploitation, abuse, and harassment across all FTS activities. Its objectives are to:

- Protect participants, employees, representatives, and the broader community from all forms of SEAH.
- Ensure that every board member, employee, volunteer, contractor, partner, and visitor understands their individual and collective responsibility to uphold a culture of respect, safety, and accountability.
- Provide robust, confidential mechanisms for reporting SEAH concerns, ensuring that every incident or allegation is managed quickly, fairly, and in accordance with victim-survivor-centred principles.
- Require regular training and clear contractual obligations to reinforce safeguarding practices at every level.
- Ensure that any breach of this policy will result in timely and appropriate disciplinary action, up to and including dismissal and referral to law enforcement.

This policy underscores FTS's commitment to the dignity and rights of every individual and ensures that safeguarding is central to organisational culture, governance, and program delivery.

2. SCOPE

This policy applies to all Free To Shine (FTS) '*Employees and Associates*' as defined below:

- All members of FTS's governing Board.
- All FTS employees, whether full-time, part-time, or casual.
- All volunteers (office-based, field-based, event-based), interns, and students on placement with FTS.
- Contractors, consultants, or service providers acting on behalf of FTS.
- Any organisations working in partnership with FTS.
- Any representatives acting in the name of FTS.
- Any visitors.

This policy applies to conduct that occurs:

- In the workplace or office environment.
- During work-related events, meetings, travel, or activities.

- In interactions with the people FTS serves, communities, partners, and other stakeholders.
- In online and digital spaces, including emails, messages, social media, audio or video calls, online meetings, and voice notes.
- In any context where an individual represents or is reasonably perceived to represent FTS.
- In all professional and personal contexts, including outside of work hours and settings.

3. RESPONSIBLE PARTIES

Free To Shine upholds clear lines of responsibility and accountability for PSEAH, ensuring all employees and associates are informed, empowered, and obligated to act. Protection from SEAH is a shared responsibility. Every individual associated with FTS is required to uphold these standards and actively participate in cultivating a safe, respectful, and inclusive environment, adhering to expected standards of behaviour related to PSEAH and reporting any breaches or concerns using designated reporting channels.

The Managing Director and Country Director are responsible for implementing this policy and ensuring employees and associates agree to expected standards of behaviour related to PSEAH.

Parties	Responsibilities
All members of FTS's governing Board	<ul style="list-style-type: none"> • Read, adhere to and promote PSEAH Policy; • Maintain secure/confidential records; • Report any SEAH breaches or concerns within 2 days using designated reporting channels. • Participate in mandatory PSEAH training. • Uphold survivor-centred and “do no harm” principles.
All FTS employees, whether full-time, part-time, or casual	<ul style="list-style-type: none"> • Read, adhere to and promote PSEAH Policy; • Maintain secure/confidential records; • Report any SEAH breaches or concerns within 2 days using designated reporting channels. • Participate in mandatory PSEAH training. • Uphold survivor-centred and “do no harm” principles.
All volunteers (office-based, field-based, event-based), interns, and students on placement with FTS.	<ul style="list-style-type: none"> • Read, adhere to and promote PSEAH Policy; • Maintain secure/confidential records; • Report any SEAH breaches or concerns within 2 days using designated reporting channels. • Uphold survivor-centred and “do no harm” principles.
Contractors, consultants, or service providers acting on behalf of FTS.	<ul style="list-style-type: none"> • Adhere to the principles of this Policy • Comply with mandatory reporting requirements • Comply with relevant Australian and/or local legislation
Any organisations working in partnership with FTS.	<ul style="list-style-type: none"> • Adhere to the principles of this Policy • Comply with mandatory reporting requirements

	<ul style="list-style-type: none"> • Comply with relevant Australian and/or local legislation
Any representatives acting in the name of FTS.	<ul style="list-style-type: none"> • Adhere to the principles of this Policy • Comply with mandatory reporting requirements • Comply with relevant Australian and/or local legislation
Any visitors	<ul style="list-style-type: none"> • Adhere to the principles of this Policy • Comply with mandatory reporting requirements • Comply with relevant Australian and/or local legislation
Country Director (Safeguarding Focal Point (SFP))	<ul style="list-style-type: none"> • Designated Safeguarding Focal Point for the Organisation • Leads implementation of PSEAH policy in Cambodia • Coordinate and deliver PSEAH training and induction; • Receive, record, triage, and escalate SEAH concerns/reports; • Serve as primary contact for SEAH concerns. • Monitor compliance and risk; • Maintains confidential records; • Advise management and Board on policy effectiveness and required improvements.
Child Protection Officer (CPO)	<ul style="list-style-type: none"> • Promotes SEAH awareness raising, training, policy review, survivor support, and risk assessment—working with the SFP. • Represent FTS in national and sector PSEAH/safeguarding networks. • Assist SFP in policy reviews and survivor-centred support (collaborative rather than duplicative).
Department Managers	<ul style="list-style-type: none"> • Receive and respond to SEAH reports (especially if SFP is unavailable); • Ensure complaints are managed per policy, escalate appropriately. • Report and resolve non-compliance or breaches in a timely manner. • Ensure all relevant parties (survivors/whistleblowers) are supported and protected.
Managing Director	<ul style="list-style-type: none"> • Leads PSEAH implementation for Australia-based operations; • Ensure all Australian Employees and volunteers complete required training; • Receive reports involving senior personnel including Country Director, SFP, or complex cases; • In conjunction with one of the Board Directors, collectively manage any incident reported in regards to the Chairperson of the Board; • Take action per policy and law.

Chairperson of the Board	<ul style="list-style-type: none"> • Ensure all Board members complete required training; • Receive and act on reports involving the Managing Director or FTS board member; • Direct Management Team to address breaches or systemic concerns; • Ensure safeguarding is a standing item at every Board meeting for proactive review and discussion. • Provide high-level oversight of PSEAH implementation, risk, and compliance.
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4. CONSEQUENCES

Breaches of this policy will result in disciplinary action, including possible dismissal and referral to authorities where required. By engaging with FTS, all individuals accept and uphold these standards.

5. RELEVANT LEGISLATION AND FRAMEWORKS

This Policy is guided by, and operates in accordance with relevant Cambodian, Australian and international laws and standards, including but not limited to:

- Law on Associations and Non-Governmental Organizations (LANGO)
- Cambodian Criminal Code
- Cambodian Labour Laws (1997) (including Article 172)
- Government of Cambodia, Law on Suppression of Human Trafficking and Sexual Exploitation (2008)
- International Labour Organization Convention 190
- UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)
- Australian Human Rights Commission Act 1986
- Sex Discrimination Act 1984 (Cth)
- Australian Modern Slavery Act 2018
- Fair Work Act 2009 (Cth)
- DFAT PSEAH Policy
- ACFID Code of Conduct

6. DEFINITIONS

Employees and Associates	Any individual engaged by FTS in any capacity including, but not limited to, employees (in Australia and overseas), consultants, contractors, volunteers (office-based, field-based, or event-based), interns, board members, visitors, or any other person undertaking work for or on behalf of FTS.
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Safeguarding	The full range of actions, policies, and procedures designed to create and maintain safe environments, and to protect people—especially those who are vulnerable—from all forms of exploitation, harm, and abuse.
Sexual Exploitation, Abuse and Harassment (SEAH)	<p>Sexual exploitation, abuse and harassment (SEAH) refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes. SEAH can affect adults or children, and it can occur between people of any gender.</p> <p>Sexual exploitation Sexual exploitation is 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. For example, coercing individuals into engaging in sexual activities in exchange for aid, services, employment opportunities or other benefits.</p> <p>Sexual Abuse Sexual abuse is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes all forms of sexual assault, rape, molestation and other forms of non-consensual sexual activity.</p> <p>Sexual harassment Sexual harassment is any unwelcome conduct of a sexual nature that occurs in circumstances in which a reasonable person, aware of those circumstances, would anticipate that the person being harassed might feel offended, humiliated or intimidated.</p> <p>Sexual harassment can take many forms. It can be overt, covert or subtle. It can be repeated or a one-off incident. Sexual harassment can happen in person, over the phone or online – including via social media. Anyone can experience sexual harassment, regardless of their sex, gender identity, sexual orientation or intersex status. Examples include but are not limited to: unwelcome physical touching, jokes, comments or messages of a sexual nature; suggestive looks, staring or leering; display of or circulation of pornographic material; and sharing or threatening to share intimate images or video without consent.</p>
Technology-Facilitated Abuse	Any act of sexual exploitation, abuse, or harassment that is carried out through technology, including (but not limited to):

	<ul style="list-style-type: none"> • Online grooming (building trust online or via messaging to exploit or abuse someone, especially a child). • Image-based abuse (sharing or threatening to share intimate images without consent, including digitally altered or deepfake images). • Sexual extortion (threatening to release personal information or images to force sexual acts). • The use of social media, email, messaging apps, or other electronic platforms to harass, exploit, or abuse • Possessing, producing, sharing, or distributing sexually exploitative images of children or adults. • Possessing or sharing photographs or videos that, even if not overtly sexual, could cause offense, humiliation, or distress to the subject.
Child	Any person under the age of eighteen (18) years, as defined by the United Nations Convention on the Rights of the Child, regardless of domestic legal definitions.
Vulnerable Adult	An adult (aged 18 or over) who may be unable to protect themselves from harm or exploitation due to factors such as age, disability, mental or physical health, gender, ethnicity, religion, sexual orientation, social or economic status, displacement, or the effects of disaster or conflict.
Victim-Survivor	Victim-survivor is a term used to describe a person who is, or has been sexually exploited, abused or harassed. The term ‘victim-survivor’ acknowledges both the harm suffered (victim) and the resilience or agency of the individual in coping with the aftermath (survivor). This term emphasises a supportive, rights-based approach to addressing their needs and upholding their dignity throughout the reporting and response process.
Transactional Sex	The exchange of money, employment, goods, services, or other benefits for sex, including sexual favours.
Consent	The voluntary and unambiguous agreement to engage in a specific act, given by a person with the capacity and freedom to do so.
Fraternisation	Refers to any intimate or social relationship occurring in the course of conducting business. This could involve – or appear to involve – partiality, preferential treatment or improper use of rank or position, including but not limited to consensual sexual behaviour.

*All definitions have been adopted in accordance with the DFAT PSEAH Policy and reflect sector best practice for safeguarding and protection.

7. GUIDING PRINCIPLES

FTS's commitment to PSEAH is guided by the following principles, consistent with DFAT and ACFID standards of good practice:

7.1 Zero Tolerance for Sexual Exploitation, Abuse and Harassment

Sexual exploitation, abuse, and harassment are never acceptable. FTS will respond to every allegation or suspicion of SEAH, whether committed by employees or associates and ensure fair, timely, and procedurally just action. Reporting SEAH is mandatory. Inaction or failure to address SEAH will result in consequences.

7.2 Child Rights and Gender Equity

FTS upholds the rights set out in the International Bill of Human Rights (IBHR), the UN Convention on the Rights of the Child (UNCRC), and the UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW). We commit to protecting all adults and children from violence and to embedding gender equity and social inclusion in our work.

7.3 Safeguarding Vulnerable Adults and Children

Preventing SEAH means identifying and addressing abuses of power. We recognise that inequalities—arising from poverty, discrimination, and power imbalances—create risk. FTS acknowledges the profound and compounded impacts of SEAH on health and wellbeing, especially when perpetrated by those in authority. Actions to prevent SEAH and promote safety are embedded in policies, programs, recruitment, employee training and daily operations to minimise risks.

7.4 Reporting Incidents is Mandatory

FTS requires mandatory and immediate reporting of SEAH concerns related to program and operations. Reporting and response mechanisms are clear, accessible, and confidential. Reporting mechanisms ensure that those who raise concerns are protected and that concerns are addressed effectively and in a timely and appropriate manner.

7.5 Adopt an Empowering and Participatory Approach

A participatory approach builds trust, increases relevance and promotes shared responsibility for safeguarding. People in communities, especially women, girls, and other groups in vulnerable situations, play a vital role in safeguarding efforts. Organisations must consult these stakeholders when assessing SEAH risk and in developing effective, culturally relevant measures to prevent SEAH. Approaches should build on existing community and national mechanisms where these are already established and trusted.

7.6 Embed Safeguarding into Organisational Culture and Leadership

Leaders actively set and model high standards of behaviour, foster respect and inclusivity, and ensure that safeguarding action is prioritised and resourced throughout the organisation. A strong safeguarding culture requires clear accountability, leadership commitment, investment of resources and continuous review and improvement of policy and practices.

7.7 Take a Victim-Survivor-Centred Approach to SEAH Prevention and Response

All actions to address SEAH are guided by a “do no harm” approach that prioritises the safety, rights, needs, and wishes of victim-survivors. This approach ensures victim-survivors are treated with dignity

and respect, kept informed throughout the process, have their confidentiality protected, and are actively involved in decision making. All responses must be trauma-informed and enable access to appropriate support services.

At FTS, we place the safety, rights, and wellbeing of victim-survivors at the centre of every response. Our “do no harm” approach commits us to:

- Treat all victim-survivors with dignity, compassion, and respect.
- Uphold informed consent and involve victim-survivors in all key decisions.
- Protect confidentiality and provide clear, accessible information and support.
- Ensure non-discrimination and enable access to appropriate health, psychosocial, and legal services.
- Involve communities, partners, and, where possible, victim-survivors themselves in developing, reviewing, and strengthening safeguarding practices.

7.8 Whistleblower Protection and Reporting Duty

All employees, volunteers, and partners have a duty to report SEAH concerns in good faith and are protected from retaliation, intimidation, or adverse action for making or supporting a report.

7.9 Addressing Gender Inequality and Power Imbalances

We recognise that gender, disability, age, sexual orientation, and socio-economic factors intersect with risk. FTS actively promotes equity, inclusion, and accountability, and works to redress these imbalances in all programs and operations.

7.10 Continuous Improvement

We rigorously review and enhance our approach through ongoing learning from incidents, community and victim-survivor feedback, employee input, and sector developments, ensuring our policy and practice are always current, robust, and effective.

8. CODE OF CONDUCT

FTS maintains zero tolerance for sexual exploitation, abuse, or harassment (SEAH). All FTS Employees and Associates must uphold the highest standards of professional and ethical behaviour and comply fully with this policy and the FTS Code of Conduct in all work and interactions related to FTS activities.

8.1 Expected Standards of Behaviour

All employees and associates must at all times:

- Act in a manner that upholds the values and reputation of FTS.
- Create and maintain a safe, trusted environment for all, actively implementing this policy to prevent and address SEAH.
- Comply with all relevant Australian legislation and the laws of countries where FTS operates, including those related to SEAH and safeguarding.
- Respect cultural contexts, acting with sensitivity in language and behaviour.
- Ensure relationships and interactions are never exploitative, manipulative, or likely to be perceived as such.
- Ensure images (photos, video, social media) present everyone—especially children and vulnerable people—with dignity, respect, and only with informed consent.

- Use social and digital media ethically and safely, and ensure all sharing is underpinned by consent and consideration of safeguarding.
- Immediately report any concerns, suspicions, or allegations of SEAH or policy non-compliance via designated reporting channels—no matter the status or role of individuals involved.

8.2 Prohibited Conduct

The following conduct is strictly prohibited by all FTS employees and associates:

- Sexual exploitation, abuse, or harassment in any form—including abuse of a position of vulnerability, power, or trust for sexual purposes.
- Profiting monetarily, socially, or politically from sexual exploitation or abuse of another person.
- Transactional sex—including the exchange of money, employment, goods, services, or other benefits for sex or sexual favours.
- Fraternisation (close or sexual relationships) between any employee or associate and a beneficiary of FTS.
- Any form of sexual activity with a child under the age of 18—regardless of mistaken belief as to age or consent.
- Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal/coercive conditions.
- Any unwelcome sexual advance, request for sexual favour, or other unwanted conduct of a sexual nature (in-person or digital), including sexual comments, gestures, or touches.
- Sexual violence, including unwanted sexual touching, sexual assault, attempted assault, and rape.
- Technology-facilitated SEAH, including online grooming, production/possession/distribution of exploitative images or videos, sexual extortion, and online harassment.
- Procuring or facilitating the procurement of sex for others, directly or via third parties.
- Use of organisational assets or resources to arrange access to sex workers, sexual exploitation, or harassment of any kind.
- Viewing, possessing, producing, or distributing pornography involving children or non-consenting adults.
- Using personal or organisational IT/digital resources to access, share, or store sexually exploitative or abusive content.
- Engaging in any sexual relationship with program participants, clients, or beneficiaries, regardless of perceived or claimed consent, due to inherent power imbalances.
- Retaliating against, intimidating, or threatening anyone making a complaint, disclosing information, or participating in a SEAH investigation.
- Failing to report suspected or known SEAH, breaches of this Code, or other safeguarding violations within the mandated timeframes.

8.3 Additional Obligations

- Immediately inform your line manager of actual, potential, or perceived conflicts of interest or relationships that may impact duty of care or safeguarding.
- Cooperate fully and honestly with investigations into SEAH or policy non-compliance, including safeguarding audits or compliance reviews.

Breaches of this Code of Conduct will result in disciplinary action, up to and including dismissal and possible referral to law enforcement.

9. REPORTING AND ACCOUNTABILITY

All employees and associates are required to promptly report any suspected or disclosed incidents of SEAH or policy breaches. See the PSEAH Procedures for detailed reporting steps and contacts.

Reports may be made verbally or in writing via:

- Safeguarding Focal Point (SFP, Country Director)
- Managing Director
- Program Manager
- Child Protection Officer (CPO)
- The Chairperson of the Board
- Confidential designated email (e.g. report@freetoshine.org)
- Any trusted employee (especially for children/youth), who must then refer to the SFP without delay

Timeframes

- SEAH incidents: Report internally as soon as possible, within two working days of becoming aware of the incident.
- Policy non-compliance: Report internally within five working days of becoming aware of the breach.
- Law enforcement: Where a report may constitute a criminal offence, report to authorities as soon as possible, per legal requirements and victim-survivor wishes/consent (unless mandatory reporting laws override consent).

Note - A SEAH Report Template is available in *Attachment 2* of the PSEAH Procedures.

10. REVIEW OF PSEAH POLICY

This policy will be reviewed every three years or when required due to changes in legislation or FTS requirements.