

- **Burmese Community Development Collaboration (BCDC)**

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

Version 2.0

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Table of Contents

1. Introduction	4
2. Purpose of the Policy	5
3. Statement of Commitment	6
4. Scope of the Policy	7
5. Definitions	9
6. Guiding Principles	11
7. Standards of Behavior and Code of Conduct	13
8. Organizational Responsibilities	15
9. Working with Partners	17
10. Recruitment, Screening, and Human Resources	19

11. Training, Awareness and Capacity Building	21
12. Safe Programming and Risk Mitigation	23
13. Community Awareness and Participation	25
14. Reporting Mechanisms	27
15. Investigation Procedures	29
16. Monitoring, Review, and Continuous Improvement	32
17. Confidentiality and Protection for Whistleblowers	34
18. Conclusion	36
References	37

1. INTRODUCTION

The Burmese Community Development Collaboration (BCDC) is committed to upholding the highest standards of integrity, accountability, and respect for human dignity in all aspects of its work. As a community-based, humanitarian, and development-focused organization operating across Australia, Myanmar, and in cross-border contexts, BCDC acknowledges its responsibility to prevent and respond to all forms of sexual exploitation, abuse, and harassment (SEAH).

Sexual exploitation, abuse, and harassment constitute serious violations of human rights and an abuse of power that undermine the safety, well-being, and trust of individuals—especially those in vulnerable situations, including women, children, displaced people, persons with disabilities, and those impacted by conflict and poverty.

BCDC recognizes that the risk of SEAH exists in all environments and that organizations working in development and humanitarian settings must take deliberate, proactive measures to prevent such harm. We are committed to a survivor-centered, trauma-informed approach to addressing SEAH, and to fostering an organizational culture that promotes respect, gender equality, and accountability.

This PSEAH Policy sets out BCDC’s expectations, responsibilities, and procedures for preventing, identifying, reporting, and responding to SEAH. It applies to all BCDC personnel, including board members, staff, volunteers, contractors, partners, and anyone representing BCDC in any capacity.

Through the implementation of this policy, BCDC seeks to strengthen community trust, ensure the protection of rights and dignity, and contribute to a safe, inclusive, and respectful environment for all people we serve and work with.

2. PURPOSE OF THE POLICY

The purpose of this policy is to establish a clear and consistent framework for the prevention, detection, and response to sexual exploitation, abuse, and harassment (SEAH) within all activities, programs, and operations conducted or supported by the Burmese Community Development Collaboration (BCDC).

Specifically, the objectives of the policy are to:

- **Prevent SEAH** by promoting a culture of respect, inclusion, and zero tolerance for exploitation, abuse, and harassment in all BCDC contexts—whether domestic, regional, or international.
- **Protect individuals and communities**, particularly vulnerable and marginalized groups—including women, children, refugees, elderly persons, LGBTI individuals, and people with disabilities—from harm associated with power imbalances, sexual misconduct, or coercion.
- **Ensure all BCDC personnel understand their obligations** regarding appropriate behavior, reporting responsibilities, and compliance with legal and ethical standards.
- **Provide clear reporting and complaint mechanisms**, including procedures that are accessible, confidential, culturally appropriate, and survivor-centered.
- **Promote organizational accountability**, transparency, and continuous improvement in safeguarding practices aligned with ACFID’s Code of Conduct, DFAT PSEAH Policy, and relevant national and international laws.
- **Strengthen capacity among staff, volunteers, and partners** to recognize, mitigate, and respond to SEAH risks in fieldwork, service delivery, and stakeholder engagement.
- **Demonstrate BCDC’s commitment** to ethical leadership, gender equality, and community empowerment by embedding SEAH prevention as a core organizational priority.

This policy complements BCDC’s broader safeguarding framework, including its Child Safeguarding Policy, Whistleblower Policy, Complaints Handling Policy, and Code of Conduct, reinforcing BCDC’s ethical standards and risk mitigation measures across all programs and partnerships.

3. STATEMENT OF COMMITMENT

The Burmese Community Development Collaboration (BCDC) is fully committed to the prevention of sexual exploitation, abuse, and harassment (SEAH) in all aspects of its work. We recognize that SEAH constitutes a serious violation of human rights, a betrayal of trust, and a significant breach of our core values.

BCDC maintains a **zero-tolerance** approach to all forms of SEAH. This means that we will take all reports seriously, respond swiftly and fairly, and hold perpetrators accountable—regardless of their role, position, or affiliation with the organization. We are committed to creating and sustaining safe, inclusive, and respectful environments for all individuals who come into contact with our organization—especially those in vulnerable or marginalized situations.

Our commitment is grounded in the following principles:

- **Do No Harm:** We ensure that our programs and practices do not cause harm or put people at risk of SEAH.
- **Survivor-Centered Approach:** All actions and responses prioritize the safety, dignity, confidentiality, and informed consent of survivors.
- **Accountability:** BCDC will hold its personnel and partners accountable for upholding the highest standards of ethical behavior and professional conduct.
- **Transparency and Integrity:** We commit to clear procedures, open communication, and responsible use of power and resources.
- **Learning and Improvement:** BCDC will continually improve its safeguarding systems through training, review, and feedback.

This Statement of Commitment is endorsed by the BCDC Board of Directors and applies to all staff, volunteers, board members, contractors, implementing partners, and representatives engaged in BCDC's operations in Australia, Myanmar, and elsewhere.

4. SCOPE OF THE POLICY

This Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy applies across all operations and activities of the Burmese Community Development Collaboration (BCDC), both in Australia and internationally, including all development, humanitarian, community support, and advocacy programs.

4.1 Who the Policy Applies To

This policy is binding upon all individuals and entities associated with BCDC, including:

- Board Members and Directors
- Executive and Senior Management
- Full-time and part-time employees
- Volunteers and interns
- Contractors, consultants, and service providers
- Partner organizations, sub-grantees, and implementing agencies
- Visitors and affiliates engaged in BCDC-supported activities

All of the above must comply with the policy as a condition of their engagement with BCDC. Failure to comply may result in disciplinary or legal action, including termination of contracts or partnerships.

4.2 Where the Policy Applies

This policy applies to:

- BCDC's head office operations in Australia
- Program and project locations in Myanmar and along border regions (e.g., Thailand-Myanmar, India-Myanmar)
- Digital, remote, or virtual program delivery spaces
- Travel or work-related settings (conferences, training, community visits, etc.)
- Any BCDC-affiliated environment where personnel interact with community members, beneficiaries, or other stakeholders

4.3 Activities Covered by this Policy

This policy applies to all BCDC-related activities, including but not limited to:

- Community engagement, outreach, and service delivery
- Humanitarian relief and emergency response programs
- Education, health, livelihoods, and capacity-building programs
- Fundraising, advocacy, and communications activities
- Partner coordination, monitoring, and sub-granting
- Use of digital platforms, social media, and electronic communications

BCDC recognizes that SEAH risks may arise in any context where power imbalances exist. Therefore, the policy applies across all levels and components of its work, including indirect, informal, and third-party relationships.

4.4 Commitment to Partners and Local Contexts

BCDC will ensure that this policy is shared with all implementing partners and contractors and included in formal agreements. Support will be provided to partners to build awareness, capacity, and systems to comply with BCDC's PSEAH standards.

5. DEFINITIONS

To ensure clarity and consistency, the following key terms are defined as used throughout this policy:

5.1 Sexual Exploitation

Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from the sexual exploitation of another.

5.2 Sexual Abuse

The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes rape, sexual assault, or any unwanted sexual activity.

5.3 Sexual Harassment

Unwelcome sexual advances, requests for sexual favors, or other verbal, non-verbal, or physical conduct of a sexual nature that creates a hostile, intimidating, or offensive work or program environment.

5.4 Survivor / Complainant

The person who is alleged to have been sexually exploited, abused, or harassed. The term 'survivor' is used to recognize the strength and resilience of individuals who experience such violations.

5.5 Perpetrator

The person who has committed or is alleged to have committed an act of sexual exploitation, abuse, or harassment.

5.6 Child

Any person under the age of 18 years, in accordance with the United Nations Convention on the Rights of the Child.

5.7 Consent

The voluntary, informed, and clear agreement between participants to engage in specific sexual activity. Consent must be given without coercion, manipulation, or impairment and may be withdrawn at any time.

5.8 Zero Tolerance Approach

BCDC's position that any form of sexual exploitation, abuse, or harassment is unacceptable and will not be tolerated. This includes a commitment to prevention, immediate action, and survivor-centered responses.

5.9 Duty of Care

The moral and legal obligation to ensure the safety and wellbeing of others, especially those in vulnerable positions who are engaged in BCDC's programs or services.

5.10 Safeguarding

All efforts to prevent harm to people, especially vulnerable groups (including children and adults at risk), resulting from contact with BCDC personnel, programs, or operations.

5.11 Whistleblower

An individual who reports suspected wrongdoing, including SEAH, in good faith, through designated reporting mechanisms.

6. GUIDING PRINCIPLES

BCDC’s approach to the prevention of sexual exploitation, abuse, and harassment (PSEAH) is grounded in a commitment to human dignity, gender equality, accountability, and survivor-centered responses. The following principles guide the development, implementation, and enforcement of this policy:

6.1 Zero Tolerance

BCDC applies a zero-tolerance approach to all forms of sexual exploitation, abuse, and harassment. Any allegation of SEAH will be treated seriously, responded to promptly, and investigated thoroughly.

6.2 Survivor-Centered Approach

BCDC is committed to ensuring that the rights, needs, and wishes of survivors are central to all prevention and response efforts. This includes:

- Respecting the survivor’s confidentiality, dignity, and decision-making.
- Ensuring access to appropriate support services, such as medical care, psychosocial assistance, and legal aid.
- Protecting survivors from re-traumatization and retaliation.

6.3 Do No Harm

All prevention and response measures must uphold the principle of “do no harm.” BCDC prioritizes the safety, wellbeing, and best interests of affected individuals and communities in all actions.

6.4 Accountability and Transparency

BCDC holds all personnel, representatives, and partners accountable for upholding this policy. Investigations, decision-making, and disciplinary actions will be conducted in a transparent and timely manner, with clear documentation and reporting.

6.5 Gender Equality and Inclusion

SEAH is deeply rooted in power imbalances, particularly gender inequality. BCDC commits to promoting gender equity, inclusion of people with disability, LGBTQIA+ people, children, and other vulnerable groups across its operations.

6.6 Shared Responsibility

PSEAH is the responsibility of all staff, volunteers, contractors, and partners. BCDC fosters a culture of prevention and safety through:

- Strong leadership and ethical role-modelling.
- Continuous education and awareness.
- Empowering communities to participate in safeguarding efforts.

6.7 Confidentiality and Privacy

All reports and investigations will be managed with strict confidentiality. Information will only be shared on a need-to-know basis, in compliance with applicable legal and ethical standards, including the Privacy Act 1988 (Cth).

6.8 Legal and Ethical Compliance

This policy is aligned with national and international laws, including:

- Australian Government DFAT's PSEAH Policy
- ACFID Code of Conduct
- UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse

7. STANDARDS OF BEHAVIOR AND CODE OF CONDUCT

All individuals engaged with the Burmese Community Development Collaboration (BCDC)—including staff, volunteers, board members, contractors, consultants, interns, and partner organizations—are expected to uphold the highest standards of ethical and professional conduct in line with BCDC’s commitment to preventing sexual exploitation, abuse, and harassment (PSEAH).

The following standards form part of BCDC’s Code of Conduct and are mandatory for all personnel and affiliates:

7.1 Expected Standards of Behavior

All BCDC-affiliated personnel must:

- **Treat all people with respect, dignity, and fairness**, regardless of age, gender, race, nationality, ethnicity, disability, sexuality, religion, or economic status.
- **Uphold a zero-tolerance approach to SEAH** in all professional and personal conduct while representing BCDC.
- **Act in a manner that promotes the safety and wellbeing of vulnerable individuals**, especially children, women, people with disabilities, and people from marginalized or disadvantaged backgrounds.
- **Avoid any behavior that could be perceived as exploitative, abusive, or harassing**, including sexual jokes, inappropriate comments, or gestures.
- **Immediately report any suspected or actual cases of SEAH**, whether witnessed or disclosed.
- **Cooperate fully with all investigations** into SEAH allegations and uphold confidentiality requirements.

7.2 Prohibited Conduct

The following behaviors are strictly prohibited under this policy and will lead to disciplinary and legal action:

- Engaging in or attempting to engage in any form of sexual exploitation, abuse, or harassment of any person.
- Using one’s position of power, trust, or authority to solicit or pressure others into sexual activity (whether consensual or not).
- Engaging in sexual activity with children (anyone under the age of 18), regardless of mistaken belief about age or cultural norms.
- Exchanging money, goods, employment, or services for sex, including with sex workers.
- Viewing, possessing, producing, or distributing child sexual abuse material (including online content).
- Retaliating against or victimizing individuals who report SEAH concerns.

7.3 Boundary Management

BCDC staff and representatives must:

- **Maintain professional boundaries** at all times in their interactions with community members, beneficiaries, and colleagues.
- **Avoid personal relationships** that could create real or perceived conflicts of interest or power imbalances.
- **Disclose any pre-existing personal relationships** that may impact professional duties or raise safeguarding concerns.

7.4 Consequences of Breach

Any breach of these standards of behavior or the PSEAH Policy may result in:

- Disciplinary action (e.g., formal warning, suspension, termination of contract)
- Removal from programs or project sites
- Referral to law enforcement or regulatory authorities
- Disqualification from future engagement with BCDC or its partners

BCDC maintains a commitment to act swiftly, fairly, and transparently in all cases of reported or suspected misconduct.

8. ORGANISATIONAL RESPONSIBILITIES

BCDC recognizes that the responsibility to prevent and respond to sexual exploitation, abuse, and harassment (SEAH) lies not only with individuals but also with the organization as a whole. BCDC commits to embedding safeguarding and PSEAH practices across its governance, operations, partnerships, and program delivery.

8.1 Board of Directors

The Board has ultimate responsibility for ensuring BCDC complies with its PSEAH obligations and maintains a strong safeguarding culture. The Board will:

- Provide leadership and oversight on all safeguarding matters, including PSEAH.
- Approve and monitor the implementation of the PSEAH Policy.
- Ensure appropriate resourcing for safeguarding mechanisms and training.
- Receive regular reports on SEAH incidents, risk assessments, and mitigation strategies.

8.2 Executive Management

BCDC's Executive Team is responsible for ensuring PSEAH is integrated into all strategic, operational, and programmatic functions. This includes:

- Championing a safe, respectful, and inclusive culture within the organisation.
- Ensuring that safeguarding roles and responsibilities are clearly defined and resourced.
- Overseeing investigations of SEAH allegations in line with the policy and principles of natural justice.
- Ensuring staff, volunteers, and partners receive regular training and understand their obligations.

8.3 Safeguarding Focal Person / PSEAH Officer

BCDC will appoint a Safeguarding Focal Person or PSEAH Officer, who will be responsible for:

- Leading the implementation of BCDC's PSEAH Policy and procedures.
- Coordinating training and awareness sessions across the organisation and with partners.
- Receiving, documenting, and escalating reports of SEAH in accordance with reporting procedures.
- Ensuring all complaints are handled confidentially, promptly, and respectfully.

8.4 Program and Project Managers

All managers are responsible for embedding PSEAH practices in their teams and ensuring that programs are safe for beneficiaries. They will:

- Conduct SEAH risk assessments as part of program design and delivery.
- Monitor implementation of safeguarding measures during project execution.
- Ensure that staff and volunteers working in the field are trained and compliant with PSEAH protocols.

8.5 Human Resources and Administration

The HR function must support BCDC's PSEAH commitments by:

- Integrating PSEAH standards into recruitment, screening, and onboarding processes.
- Ensuring staff contracts, job descriptions, and performance reviews reflect safeguarding responsibilities.
- Supporting disciplinary processes in the event of policy breaches.

8.6 All Staff, Volunteers, and Contractors

Everyone working for or representing BCDC has a personal and professional responsibility to:

- Act in accordance with BCDC's Code of Conduct and PSEAH Policy.
- Report suspected or known incidents of SEAH immediately using designated channels.
- Participate in all required safeguarding and PSEAH training.
- Maintain professional boundaries and model respectful behaviour at all times.

8.7 Partners and Third Parties

BCDC expects all partners, implementing agencies, consultants, and third-party contractors to:

- Adopt safeguarding standards aligned with this policy.
- Sign and adhere to the PSEAH clauses in partnership agreements and contracts.
- Participate in capacity-building efforts as needed.
- Report any SEAH allegations involving BCDC's programs or resources without delay.

9. WORKING WITH PARTNERS

BCDC recognizes that its responsibility to prevent and respond to sexual exploitation, abuse, and harassment (SEAH) extends to its partnerships and implementing arrangements. We are committed to working only with partners who uphold equivalent safeguarding and PSEAH standards in their policies, practices, and culture.

9.1 Due Diligence

Before entering into agreements with implementing partners, consultants, contractors, or suppliers, BCDC will:

- Conduct safeguarding and PSEAH due diligence assessments.
- Review the partner's PSEAH and safeguarding policies or, where none exist, assess willingness and capacity to adopt BCDC's standards.
- Require disclosure of any previous SEAH-related incidents, investigations, or unresolved complaints involving the partner.

9.2 Safeguarding Clauses in Agreements

All Memorandums of Understanding (MOUs), partnership contracts, or sub-granting agreements will:

- Include mandatory PSEAH clauses and Code of Conduct compliance.
- Require partners to report any SEAH allegations involving BCDC funds, personnel, or beneficiaries.
- Specify the consequences for non-compliance, including suspension or termination of the agreement.

9.3 Capacity Building

Where gaps in partner safeguarding capacity are identified, BCDC will:

- Offer guidance, training, and tools to support partners in adopting and implementing effective PSEAH measures.
- Collaborate with partners to co-develop context-specific risk mitigation strategies.
- Encourage knowledge sharing and inclusion of local safeguarding norms and survivor support practices.

9.4 Monitoring and Reporting

BCDC will monitor partners' compliance with PSEAH obligations through:

- Routine program audits, field visits, and safeguarding checklists.
- Partner reporting templates that include PSEAH indicators.
- Direct communication channels for beneficiaries to safely raise concerns about partner-conducted programs.

9.5 Joint Responses to Incidents

Where a SEAH concern arises involving a partner:

- BCDC will work with the partner to assess the allegation and determine appropriate next steps, ensuring the safety of the survivor.
- Investigations may be jointly conducted or led by the appropriate organization, depending on the nature of the partnership and jurisdiction.
- All partners are expected to cooperate fully and uphold principles of confidentiality, survivor-centered support, and fair process.

10. RECRUITMENT, SCREENING, AND HUMAN RESOURCES

BCDC is committed to ensuring that all staff, volunteers, contractors, and representatives are suitable to work in environments where they may interact with vulnerable individuals, including children and adults at risk. Strong recruitment and screening processes are critical to preventing individuals who pose a risk of sexual exploitation, abuse, or harassment (SEAH) from entering the organization.

10.1 Safer Recruitment Practices

All BCDC recruitment processes will include:

- **Clear Role Descriptions:** All job advertisements and position descriptions will outline responsibilities related to safeguarding and PSEAH.
- **Behavioural-Based Interviewing:** Interviews will include specific questions about attitudes toward SEAH prevention, safeguarding responsibilities, and working with vulnerable populations.
- **PSEAH Declarations:** Applicants must declare any past criminal convictions, misconduct, or disciplinary actions related to SEAH, safeguarding, or abuse.

10.2 Reference and Background Checks

Before engagement of any individual in a paid or unpaid capacity, BCDC will:

- Conduct at least two reference checks, including one from a recent employer.
- Ask direct questions to referees about any concerns related to past behaviour, particularly in relation to SEAH or working with vulnerable groups.
- Verify the applicant's identity and employment history.
- For roles involving direct contact with children or vulnerable adults, obtain Working With Children Checks (WWCC) or equivalent criminal background checks from all relevant countries of employment in the past five years.

10.3 Conditions of Employment

All employment agreements, volunteer contracts, and consultancy agreements will:

- Include mandatory adherence to BCDC's Code of Conduct and this PSEAH Policy.
- Outline disciplinary consequences for breaches, including dismissal or termination of contract.
- Require all personnel to undergo safeguarding and PSEAH induction training prior to commencement of duties.

10.4 Ongoing HR Risk Management

BCDC will:

- Monitor staff conduct through regular performance appraisals and supervisory oversight.
- Maintain incident reporting and whistleblower mechanisms accessible to all personnel.
- Ensure that inappropriate behavior, power imbalances, or boundary violations are identified and addressed early.
- Take immediate action to address concerns regarding SEAH risks or misconduct within the organization.

10.5 Exit Procedures

When staff, volunteers, or contractors exit the organization:

- A debrief will include reflection on any safeguarding concerns or relevant observations.
- Exit interviews will include safeguarding-related questions and ensure any issues are documented and addressed.
- No individual will be permitted to use a BCDC reference if they have unresolved SEAH-related concerns on file.

11. TRAINING, AWARENESS AND CAPACITY BUILDING

BCDC recognizes that a strong culture of safeguarding and PSEAH can only be sustained through continuous learning, awareness-raising, and investment in capacity building across all levels of the organization. To this end, BCDC commits to a structured and proactive training and awareness strategy designed to equip all personnel, volunteers, partners, and stakeholders with the knowledge, skills, and attitudes required to prevent, identify, and respond to sexual exploitation, abuse, and harassment.

11.1 Mandatory Induction and Onboarding

- All staff, volunteers, contractors, and Board members must complete **PSEAH-specific induction training** upon joining the organization. This will cover:
 - Understanding sexual exploitation, abuse, and harassment.
 - BCDC's PSEAH Policy and Code of Conduct.
 - Reporting mechanisms and protections for whistleblowers.
 - Expectations for ethical behavior and professional boundaries.
- Completion of this training is a **precondition for active engagement** with BCDC in any formal capacity.

11.2 Annual Refresher Training

- BCDC will provide **annual PSEAH refresher training** for all personnel and key stakeholders.
- Training content will reflect:
 - Updates to relevant laws or international standards.
 - Lessons learned from recent incidents, internal reviews, or external developments.
 - Case studies, scenario analysis, and interactive discussions to strengthen understanding.

11.3 Specialized and Role-Specific Training

- **Targeted training** will be delivered to individuals in roles with elevated safeguarding responsibilities (e.g., program staff, project managers, community outreach workers).
- Topics may include:
 - Managing sensitive disclosures.
 - Cultural and gender sensitivity.
 - Survivor-centered response principles.
 - Power dynamics and protection in humanitarian settings.

11.4 Partner and Contractor Awareness

- BCDC will provide or facilitate **PSEAH orientation sessions** for all implementing partners, subcontractors, and third-party vendors as part of onboarding or partnership development.
- Partners will receive:
 - A copy of BCDC’s PSEAH Policy and reporting expectations.
 - Access to training or resources tailored to their operational context.
 - Guidance on incorporating PSEAH principles into their own practices and policies.

11.5 Community and Beneficiary Engagement

- BCDC will implement **awareness campaigns** and community education strategies that:
 - Inform beneficiaries about their rights to protection from SEAH.
 - Explain how to report abuse or misconduct safely and confidentially.
 - Encourage participation in creating safe environments.
- Communication materials will be provided in **accessible formats and local languages**, including visual or oral formats where appropriate.

11.6 Monitoring Training Effectiveness

- BCDC will regularly assess the **effectiveness of its PSEAH training programs** by:
 - Gathering participant feedback through surveys and interviews.
 - Tracking completion and compliance rates across all roles.
 - Reviewing training outcomes as part of broader policy reviews and audits.
- Improvements will be made to ensure that training remains **relevant, participatory, and evidence-based**.

12. SAFE PROGRAMMING AND RISK MITIGATION

BCDC is committed to ensuring that all its programs, activities, and service delivery mechanisms are designed, implemented, and monitored with a primary focus on the safety, dignity, and rights of all individuals, particularly women, children, people with disabilities, and vulnerable or marginalized groups.

To this end, BCDC adopts a proactive, risk-based approach to identify, assess, and mitigate the risk of sexual exploitation, abuse and harassment (SEAH) across its programming cycle.

12.1 Integrating Safeguards into Program Design

- All new projects and activities must incorporate **PSEAH risk assessments** during the planning and design phases.
- Risk mitigation strategies will be integrated into:
 - Project proposals
 - Budgets
 - Implementation plans
 - Monitoring and evaluation (M&E) frameworks
- Where appropriate, community consultation will inform the identification of cultural and contextual SEAH risks.

12.2 Risk Identification and Analysis

- Program teams must consider factors such as:
 - Power imbalances between staff and community members
 - Gender dynamics, local norms, and cultural sensitivities
 - Access to isolated or vulnerable populations (e.g., refugees, IDPs, children)
 - Living and working conditions of staff and beneficiaries
- Each project will include a **PSEAH Risk Register** as part of its safeguarding documentation.

12.3 Community Participation and Feedback

- BCDC will ensure the voices of community members, especially women and girls, are reflected in program design and evaluation.
- Beneficiaries will be:
 - Informed of their rights, expected behaviors of staff, and how to report concerns
 - Encouraged to participate in monitoring processes
 - Provided with safe, accessible feedback and complaint mechanisms

12.4 Staff Deployment and Supervision in High-Risk Areas

- For field-based programs or high-risk locations:
 - A minimum of two staff will be deployed together where feasible (no staff alone in isolated areas)
 - Strong supervision protocols will be established
 - Regular check-ins and field visit debriefs will be conducted to monitor behaviour and safety
- Personnel will be carefully vetted and briefed prior to deployment.

12.5 Safe Access and Inclusion

- Programs will be designed to ensure **equitable access** and to avoid reinforcing discriminatory or exploitative systems.
- Special measures will be taken to:
 - Ensure safe access to services for people with disabilities, LGBTQI+ individuals, children, and women
 - Reduce dependency and vulnerabilities that may increase the risk of SEAH
 - Avoid conditionalities in the delivery of aid, services, or assistance

12.6 Monitoring and Evaluation for Safeguarding

- All project evaluations and reports must include an assessment of PSEAH compliance, including:
 - Whether risks were properly mitigated
 - Whether safe feedback and reporting mechanisms were effective
 - Lessons learned and adaptations required
- Safeguarding indicators will be built into M&E frameworks and reported to senior management and the Board.

12.7 Mitigating SEAH in Digital and Remote Programming

- For virtual learning or remote assistance, BCDC will:
 - Protect personal data and images of participants, especially children
 - Prevent inappropriate online interactions between staff and beneficiaries
 - Use secure and monitored platforms to deliver services and training

13. COMMUNITY AWARENESS AND PARTICIPATION

BCDC is committed to empowering communities to take an active role in safeguarding against sexual exploitation, abuse and harassment (SEAH). We believe that communities are not passive recipients of services but partners in ensuring safe, respectful, and accountable programming.

To uphold this principle, BCDC integrates community awareness and participation into all its programs and engagement efforts.

13.1 Promoting Awareness of Rights and Protections

- BCDC will ensure that all individuals participating in or impacted by its programs are aware of:
 - Their **right to be safe from sexual exploitation, abuse, and harassment**
 - The **expected standards of behavior** for BCDC staff, volunteers, and partners
 - The existence of **complaints and reporting** mechanisms
- This information will be shared in **clear, accessible, and culturally appropriate** formats (e.g., local languages, visual aids, verbal briefings).

13.2 Community Orientation and Briefings

- At the start of any project, community briefings will be conducted to:
 - Explain the nature of the program
 - Introduce the organization's **PSEAH commitments**
 - Outline the ways community members can safely raise concerns
- These briefings will be tailored for diverse groups, including women, children, and people with disabilities.

13.3 Participatory Program Design and Risk Assessment

- Community representatives, particularly from vulnerable groups (e.g., women, youth, people with disability), will be included in:
 - Program design consultations
 - Risk identification processes
 - Discussions on protective strategies
- This participation ensures the **cultural relevance** of safeguards and builds **collective ownership** of safety measures.

13.4 Informed Consent and Confidentiality

- BCDC ensures that all participants in its programs:
 - Provide **informed consent** before any engagement (e.g., surveys, interviews, photo use)
 - Are informed of their right to **refuse or withdraw** participation at any time
- All personal information shared during program activities will be treated as **strictly confidential** in line with BCDC's privacy policies.

13.5 Safe Feedback and Engagement Platforms

- BCDC will establish community-based feedback mechanisms that are:
 - **Anonymous (if preferred)**, confidential, and accessible
 - Monitored regularly by trained safeguarding personnel
 - Culturally and linguistically appropriate for different community members
- Community members will be encouraged to provide **both complaints and suggestions**, helping improve program delivery and safety.

13.6 Community Monitoring and Learning

- Selected community members or local leaders may serve as **safeguarding focal points**, supported by BCDC.
- Communities will be involved in:
 - Monitoring compliance with safeguarding principles
 - Providing feedback during midline and endline evaluations

Participating in learning sessions to reflect on and improve protection measures

14. REPORTING MECHANISMS

BCDC is committed to providing safe, accessible, confidential, and culturally sensitive reporting avenues for individuals who experience or witness sexual exploitation, abuse, or harassment (SEAH). Prompt, secure, and respectful reporting mechanisms are critical to enabling prevention, response, and accountability.

14.1 Multiple Reporting Channels

BCDC provides the following confidential avenues for reporting SEAH-related concerns:

- **Dedicated Email:** A secure, monitored email address will be presented for submitting written complaints.
- **Verbal Reporting:** Reports may be made in person or by phone to a designated Safeguarding Focal Point, manager, or trusted staff member.
- **Anonymous Reporting Tools:** Anonymous web-based forms or suggestion boxes at field sites (where appropriate) to encourage safe disclosures.
- **Third-Party Reporting:** Community leaders, partner staff, or legal representatives may submit reports on behalf of survivors, with consent.

All complaints received through these channels will be treated with strict confidentiality and in accordance with BCDC's privacy standards.

14.2 Accessibility and Cultural Sensitivity

- Reporting mechanisms will be made accessible to all groups, including children, people with disabilities, LGBTI persons, and non-English speakers.
- Information about how to report SEAH concerns will be made available in relevant languages and formats (e.g., visual posters, translated handbooks, audio messages).
- Staff will be trained to receive disclosures respectfully and without judgment, ensuring that no one is deterred from coming forward due to stigma, shame, or fear of reprisal.

14.3 Receiving and Handling Complaints

- Reports may be submitted by **survivors, witnesses, staff, volunteers, partners, or community members.**
- Upon receiving a report, the Safeguarding Focal Point (or designated officer) will:
 - Acknowledge receipt (if appropriate and safe to do so).
 - Document the report clearly, avoiding leading questions.
 - Conduct an initial safety and risk assessment.
 - Take immediate protective measures if a person is at risk of harm.

Reports that involve **criminal behavior**, including sexual assault or child abuse, will be escalated in accordance with legal obligations and BCDC's investigation protocols.

14.4 Timeframe and Case Management

- All reports will be logged in a secure incident register within **24 hours** of receipt.
- Cases will be managed through a structured complaints handling procedure, ensuring timely updates, confidentiality, and survivor engagement throughout the process.
- Case status will be regularly reviewed and reported (anonymously) to management and the Board, in line with accountability requirements.

14.5 Protection Against Retaliation

BCDC strictly prohibits retaliation, threats, or discrimination against anyone who makes a complaint in good faith or participates in an investigation. Allegations of retaliation will be investigated and dealt with as serious misconduct.

14.6 Support for Reporters

Complainants, survivors, and witnesses will be offered access to psychosocial support, legal advice, and referrals to specialized services, regardless of whether the report results in a formal investigation.

15. INVESTIGATION PROCEDURES

BCDC is committed to conducting fair, impartial, confidential, and survivor-sensitive investigations into all reports of sexual exploitation, abuse, and harassment (SEAH). The purpose of investigations is to establish the facts, determine whether a breach of policy has occurred, and take appropriate action to protect individuals and prevent recurrence.

15.1 Principles Guiding Investigations

All investigations will adhere to the following principles:

- **Confidentiality:** The identities of survivors, complainants, and witnesses will be protected to the fullest extent possible.
- **Fairness and Natural Justice:** All parties will have the opportunity to present their account, and no assumptions of guilt will be made without evidence.
- **Timeliness:** Investigations will be initiated promptly and concluded without undue delay.
- **Survivor-Centred Approach:** The safety, dignity, and wellbeing of the survivor will guide every stage of the investigation.
- **Impartiality and Independence:** Investigators will have no conflicts of interest and may be external if the case complexity or sensitivity requires.

15.2 Roles and Responsibilities

- **Safeguarding Focal Point:** Receives complaints, initiates case documentation, and coordinates the investigation process.
- **Investigation Lead:** An impartial and trained internal or external professional appointed to conduct the investigation.
- **Executive Management:** Ensures investigations are supported, reviewed, and outcomes are implemented.
- **Board of Directors:** Provides oversight in serious or high-risk cases, especially those involving leadership or systemic issues.

15.3 Investigation Process

1. Initial Assessment:

- Determine whether the allegation warrants a full investigation based on available information, potential risk, and policy violations.
- Assess immediate risks to survivor or others and take protective action if needed.

2. Terms of Reference:

- Define the scope, objectives, methodology, timelines, and responsible parties.
- Clarify reporting lines and confidentiality protocols.

3. Evidence Collection:

- Conduct interviews with the complainant, alleged perpetrator, and relevant witnesses.
- Review documents, communications, field records, and other supporting evidence.
- Maintain accurate, secure records of all evidence and findings.

4. Rights of the Parties:

- The accused will be informed of the allegation and given a fair chance to respond.
- Survivors will be kept informed of progress, unless this poses a safety risk or violates confidentiality.

5. Investigation Report:

- A written report will detail the findings of fact, conclusions, and recommended actions.
- The report is submitted to senior leadership (or the Board, if appropriate) for review.

15.4 Outcomes and Disciplinary Actions

If a breach of policy is substantiated, disciplinary actions may include:

1. Termination of employment or volunteer engagement
2. Contract cancellation or withdrawal of partnership
3. Legal or criminal referral
4. Mandatory retraining or compliance requirements

In cases where allegations are not substantiated:

1. Measures will be taken to restore reputations if damage has occurred.
- Additional training or support may still be recommended to mitigate risks.

15.5 Referral to Authorities

BCDC will report SEAH cases to police or relevant authorities in accordance with:

- Australian laws and child protection obligations
- DFAT and ACFID reporting requirements
- Host country legal frameworks (for international operations)

15.6 Survivor Support and Aftercare

Regardless of the investigation outcome, BCDC will:

- Offer support services to the survivor, including counseling and legal aid.
- Prioritize non-discrimination, trauma-informed responses, and voluntary participation throughout.

15.7 Learning and Prevention

Findings from investigations will be used to improve:

- Policies and procedures
- Safeguarding training
- Risk assessments and partner due diligence

Summary learnings will be reviewed periodically by leadership and incorporated into organizational development processes.

16. MONITORING, REVIEW, AND CONTINUOUS IMPROVEMENT

BCDC is committed to fostering a culture of continuous learning, accountability, and improvement in its efforts to prevent and respond to sexual exploitation, abuse, and harassment (SEAH). This section outlines how BCDC will systematically monitor policy implementation, evaluate effectiveness, incorporate feedback, and ensure alignment with emerging standards and obligations.

16.1 Ongoing Monitoring and Compliance Checks

- The **PSEAH** Focal Point, in collaboration with Executive Management, will regularly monitor how the PSEAH Policy is being implemented across all programs and partner organizations.
- Monitoring will include:
 - Compliance with training requirements
 - Review of incident reports and response timeliness
 - Implementation of risk mitigation measures
 - Partner and contractor compliance with safeguarding obligations
- Field visits, stakeholder interviews, and desk-based reviews may be used to verify adherence to this policy.

16.2 Internal Audits and Performance Reviews

- Internal audits will assess:
 - Staff and volunteer understanding of the policy
 - Integration of safeguarding principles in program design and delivery
 - Documentation and management of SEAH complaints
- Findings will inform improvements to procedures, training modules, and risk assessments.
- Annual performance reviews for senior staff will include safeguarding accountability indicators.

16.3 Survivor and Stakeholder Feedback

- BCDC will establish safe and confidential mechanisms to receive feedback from:
 - Survivors and complainants (with sensitivity and consent)
 - Program participants, including women, children, and marginalized groups
 - Staff, volunteers, and partners
- Regular community consultations will be conducted to ensure that the PSEAH measures remain culturally relevant, effective, and accessible.

16.4 Policy Review and Update

- This policy will be reviewed:
 - At least every two (2) years
 - In response to a significant safeguarding incident
 - Following updates to ACFID, DFAT, or international SEAH frameworks
- The review process will include:
 - A stakeholder consultation process
 - Legal and regulatory review
 - Benchmarking with international best practices
- Revisions will be approved by the BCDC Board of Directors and communicated to all staff, volunteers, and partners.

16.5 Commitment to Accountability and Transparency

- BCDC will publicly report on its safeguarding efforts in its Annual Report, including:
 - Number of safeguarding trainings conducted
 - Number of SEAH complaints received and addressed (in anonymous, aggregate form)
 - Improvements made based on review findings
- Lessons learned from investigations, audits, and stakeholder feedback will be documented and used to inform future safeguarding strategies.

16.6 Capacity Strengthening and Resource Allocation

- Adequate resources (financial, human, and technical) will be allocated for:
 - Training and development of staff and partners
 - Development of safe reporting tools and feedback mechanisms
 - Hiring or engaging specialist support where required
- Strategic partnerships with safeguarding experts and networks will be maintained to build institutional knowledge and capacity.

17. CONFIDENTIALITY AND PROTECTION FOR WHISTLEBLOWERS

BCDC recognizes that individuals who report sexual exploitation, abuse or harassment (SEAH) require strong assurances that their disclosures will be handled with the utmost confidentiality, and that they will be protected from any form of retaliation or victimization. This commitment applies to survivors, complainants, witnesses, staff, volunteers, and other stakeholders involved in making or supporting a report.

17.1 Confidentiality and Privacy Protections

- All information related to SEAH reports and investigations will be treated as strictly confidential and handled in accordance with privacy legislation, including the **Privacy Act 1988 (Cth)** and relevant data protection laws.
- Access to sensitive information will be restricted to those directly involved in the response and investigation processes and on a strict “need-to-know” basis.
- Records of complaints, investigations, and outcomes will be securely stored and managed in accordance with BCDC’s recordkeeping and data protection policies.
- Personal details of the survivor, complainant, or witness will not be disclosed without their informed consent, unless required by law or necessary to protect a person from immediate harm.

17.2 Protection from Retaliation

- BCDC prohibits any form of retaliation against individuals who, in good faith, report concerns or participate in an investigation related to SEAH.
- Retaliation includes dismissal, demotion, discrimination, harassment, intimidation, or any action intended to silence or punish.
- Any individual who engages in retaliatory behavior will be subject to disciplinary action, including possible termination of employment, contracts, or partnership.

17.3 Whistleblower Support and Protection Mechanisms

- Individuals making a report will be offered appropriate support, including access to counselling services, legal advice, or referral to external protection services as needed.
- BCDC provides the option to report SEAH concerns anonymously, understanding that anonymity may affect the ability to fully investigate the matter.
- BCDC has a designated **Whistleblower Protection Officer (WPO)** or Safeguarding Focal Point responsible for ensuring that whistleblowers are supported, protected, and informed throughout the process.

17.4 Good Faith Reporting

- Reports made honestly and with reasonable grounds for concern—even if not substantiated—will be protected under this policy.
- Deliberate false reporting or misuse of reporting mechanisms may be subject to disciplinary action.

17.5 Survivor-Centered Communication

- Survivors and whistleblowers will be updated on the progress and outcome of the report wherever appropriate, with due regard to confidentiality and safety considerations.
- BCDC will respect the choices of survivors regarding how they wish to engage in the response process, and will always prioritize their well-being, safety, and dignity.

18. CONCLUSION

The Burmese Community Development Collaboration (BCDC) is firmly committed to maintaining the highest standards of ethical and respectful conduct by preventing and responding effectively to all forms of sexual exploitation, abuse, and harassment (SEAH). This policy affirms BCDC’s zero-tolerance stance towards SEAH and sets out clear principles, responsibilities, procedures, and mechanisms to safeguard the dignity, safety, and rights of all individuals we work with—especially the most vulnerable.

BCDC recognizes that preventing SEAH is not solely about responding to incidents, but about creating a culture of respect, inclusion, integrity, and accountability. Every person engaged in or associated with BCDC’s work, whether staff, volunteers, partners, or contractors, is expected to uphold the values and behavioral standards outlined in this policy.

The successful implementation of this policy requires ongoing vigilance, proactive leadership, continuous training, meaningful community engagement, and transparent accountability structures. Through these commitments, BCDC strives to foster safe environments for all and maintain the trust placed in us by communities, partners, and donors.

This policy will be reviewed regularly to ensure that it remains effective, current, and in alignment with international best practices, legal frameworks, and ACFID Code of Conduct standards.

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