Prevention of Sexual Exploitation, Abuse or Harassment Policy

Tetra Tech International Development Pty Ltd

Reporting channels

Non-anonymous reporting

- Speak to your supervisor
- Program safeguarding focal point
- Email pseah@tetratech.com
- Call the COZ Safeguards Hotline on +61 8 8375 4433, or via Microsoft teams *COZ Safeguards Hotline*
- Post to Ground floor, 422 King William Street Adelaide, SA, 5000

Anonymous reporting

Make an anonymous report through the complaints and reporting page on Tetra Tech's website https://intdev.tetratechasiapacific.com/complaint/

July 2024



Content note: Sexual exploitation, abuse, or harassment in the workplace

If reading this policy causes you to feel distressed or you wish to report sexual exploitation, abuse, or harrassment you have experienced or observed, here are some options to seek suppot or counselling:

- Nominated Tetra Tech support people: Amy Gildea or Elise Jione.
- Our Employee Assistance Program: **TelusHealth** To arrange an appointment for support, simply visit one.telushealth.com. Enter **Username:** Tetratech and **Password:** Tetratech01

In Australia you can also contact:

- The Equal Opportunity Commission in your state or territory
- The Australian Human Rights Commission at 1300 656 419
- 1800RESPECT (1800 737 732), the National Sexual Assault, Domestic Family Violence Counselling Service.

Version history

Version	Date	Update description	Responsible
000	16/3/21	Draft	Louise Khouri Revell
001	xx/5/21	Review and sign-off for implementation	Amy Gildea
002	01/07/24	Review and update reporting channels	Elise Jione

A message from our Managing Director

As a leading development consulting firm, we work with people and communities to achieve a positive impact. We live our values. We seek to contribute to thriving people, thriving communities and a thriving planet.

This begins with creating a thriving workplace.

It is important that we create a workplace environment that is safe, respectful and inclusive for all.

This is personally important to our Leadership Team and to me.

It is also fundamental to our purpose and values as an organisation. As a purpose-driven organisation, we are committed to improving the lives of the people and communities we work with. It is essential that this same commitment to health, safety and wellbeing extends to all our people.

While the problem of sexual harrassment and abuse is widespread in all employment contexts our sector's and indeed our organisation's core work is with highly vulnerable people at increased risk of all forms of abuse of power. It means that we must go beyond what is expected in addressing the issue and being transparent about how we do to deserve the trust of those we work with, our staff and our partners.

I urge all our staff to challenge our workplace response and 'step up' with a strong well thought out compassionate approach that is not left to chance.

We need to be prepared to speak up. Not only when we may be offended ourselves, but when we feel someone else may be uncomfortable. Particularly in such a multi-cultural, international organisation, we must not overlook how difficult it may be for a colleague to feel they can speak up for themselves.

Upon assuming the Managing Director role, I became aware that for some of our colleagues this is not a physically or psychologically safe organisation; which I have learned about from individual reports, and our Workplace Equality and Respect Surveys. Context around these issues is very important. I am aware that on a number of the occassions that were reported, there may not have been any serious intent to cause offence.

Research shows that issues often arise as a product of a mainly male-dominated workplace that existed 20–30 years ago, at a time when these behaviours were tolerated. It is however, important to note, that while such behaviour might have been tolerated in that context, it is neither legal or acceptable. And regardless of whether on not there is an intent to cause offence, it is still inappropriate behaviour.

I believe we all know inherently what constitutes professional and appropriate conversation and behaviour. It is an integral aspect of our roles and values, including courteous and respectful communication to a wide variety of people, in many diverse situations. This same behaviour should extend to all of our team.

I am proud of the organisation where we work and it is important to remember that it is a good place to work. However we must always strive to be and do better, and there is scope for improvement.

It is important that there is clear understanding that inappropriate workplace behaviours will not be tolerated.

To this end, we have developed our Preventing Sexual Exploitation, Abuse and Harrassment Policy to outline both the expectations and requirements of our people and our partners.

I recognise that this is a sensitive issue for many people. We encourage you to use our Employee Assistance Program, nominated support and line managers to provide guidance and support as you need.

I am, as always, happy and available to discuss this further with any of you, in the manner you feel most comfortable.



Amy Gildea



Managing Director, Asia Pacific

Glossary

Key terms and definitions

The following descriptions of sexual exploitation, sexual abuse, and sexual harassment, which combine international and Australian definitions are used in this policy and associated procedures and training documents.

Child(ren)	In accordance with the United Nations Convention of the Rights of the Child, 'child' means every human being under the age of 18 unless under the law applicable to the child, majority is attained earlier. For the purposes of this Policy, Tetra Tech considers a child to be a person under the age of 18 years.
Contractor(s)	A person or entity engaged pursuant to a contract for services. Includes: » Specified personnel nominated in a head agreement with an intermediary company (the contractor) to which a payment is made (although the specified personnel may themselves be employees and not independent contractors) » If the person performing the service is the service provider; he/she is an independent contractor.
Downstream partner	Includes all suppliers, individuals, and organisations with whom our client directly enters into an Agreement to deliver its objectives, including but not limited to: » Suppliers of goods and services » Contractors and service providers including consultants, advisers and other directly contracted individuals » Non-government organisations, civil society organisations » Grant recipients » Multilateral organisations » Partner governments and bilateral donor partners » Other Australian Government entities.
Exploitative sex and relationships	Men and women can be sexually exploited through transactional sex even in places where sex work is legal. After a crisis, people may engage in transactional sex to generate income and meet basic survival needs. They may not identify with the term 'sex worker'. For a person purchasing sex in this setting, it is often impossible to distinguish between exploitative and non-exploitative transactional sex.
Fraternisation	Any relationship that involves, or appears to involve, preferential treatment or improper use of rank or position. Where there are significant power imbalances at play (based on gender, age, ability, authority, social and economic inequality, etc) there is a strong likelihood that fraternisation could amount to or have the appearance of an exploitative or transactional relationship. The behaviour does include a number of situations including voluntary sexual behaviour. It could include sexual behaviour not amounting to intercourse, a close and emotional relationship involving public displays of affection or private intimacy and the public expression of intimate relations. This policy considers fraternisation in our business as highly risk laden and can be exploitative. There is a prohibition of any fraternisation by all non-national personnel whilst engaged in project business, staff, or service delivery.
Perpetrator	A person (or group of persons) who commits an act of sexual exploitation, abuse or harassment or other type of crime or offence.
Primary prevention	Whole-of-population initiatives that address the primary (first or underlying) drivers of violence. The approach requires changing the social conditions, such as gender inequality, that excuse, justify or even promote violence against women and their children.
Respectful relationships	Refers to relationships among intimate, romantic, or dating partners, characterised by non-violence, equality, mutual respect, consideration, and trust.

Sexual abuse	The actual or threatened physical intrusion of a sexual nature. Including rape and non-consensual kissing or touching whether by force or under unequal or coercive conditions. All sexual activity with someone under the age of consent defined in Vanuatu as under 15 for heterosexual activity and 18 for homosexual activity is considered sexual abuse. **Note.** This is also covered in Tetra Tech International Development's Child Protection policy.
Sexual exploitation	Any actual or attempted abuse of a position of vulnerability, unequal power, or trust for sexual purposes. This means the abused person might be vulnerable where power is unequal or there is an abuse of trust. For example, the person might be junior in time in the workplace or reliant on supervision. The person may be a recipient of resources from our project or may be a person whose job or livelihood or financial safety depends on the relationship. The exploitation might include profiting monetarily, socially, or politically from sexual exploitation of another. This may mean the person being sexual exploited is given something in exchange which could involve money, position, promotion, or advantage in selection.
Sexual harassment	A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favours, or engages in other unwelcome conduct of a sexual nature, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated. Sexual harassment can take various forms. It can be obvious or indirect, physical, or verbal, repeated or one-off and perpetrated by any person of any gender towards any person of any gender. Sexual harassment can be perpetrated against beneficiaries, community members, citizens, as well as staff and personnel. Some examples of behaviour that may be sexual harassment include: » Staring or leering » Unnecessary familiarity, such as unwelcome affection or touching » Suggestive comments or jokes » Insults or taunts of a sexual nature » Intrusive questions or statements about your private life » Displaying posters magazines or screen savers of a sexual nature » Sending sexually explicit emails or text messages » Inappropriate advances on social networking sites » Accessing sexually explicit internet sites » Requests for sex or repeated unwanted requests to go out on dates. Behaviour that may also be considered an offence under criminal law such as physical assault, indecent exposure, sexual assault, stalking or obscene communications.
Transactional sex	The exchange of money, employment, goods, or services for sex, including sexual favours.
Victim/survivor	A person who is, or has been, sexually exploited, harassed, or abused.

About this policy

Tetra Tech International Development Pty Ltd ('Tetra Tech') is committed to promoting a culture where people are treated with dignity and respect, irrespective of country, project, or office where we work.

Implementing this policy reflects our commitment to supporting gender equality and challenging the gender drivers of violence against women and children. This policy aligns with and supports Tetra Tech's purpose: thriving people, thriving communities, thriving planet, and actively embraces our values that commit us to a safe work environment.



Strive for achievement

We are committed to high performance, being at our best and always delivering on our promises



Be open and transparent

We have an open and transparent culture where people can share openly and say what they mean



Listen to and respect people

We value people, listen deeply and ensure all voices are heard and respected



Pursue curiosity and have a passion for learning

We constantly aim to learn and grow through research, feedback and reflection



Deliver solutions that make a difference

We believe in doing things that make a positive difference and having impact beyond the project life



Embrace diversity and collaboration

We work as one team, embrace diversity and actively invite different perspectives

Purpose

This policy exists so that:

- Ultimately, there is no sexual exploitation, abuse, and harassment of children or any adults who interact or engage with Tetra Tech.
- Internally, Tetra Tech people know clearly that any form of sexual exploitation, abuse and harassment is unacceptable.
- Externally, all Tetra Tech people, partners and communities we work with, know Tetra Tech standards of behaviour related to the prevention sexual exploitation, abuse, and harassment.
- All Tetra Tech people and partners know how to report and make a complaint relative to sexual exploitation, abuse and harassment incidents, and mechanisms for this are clear, accessible, sensitive to gender and culture, and confidential.
- Responses to sexual exploitation, abuse and harassment allegations or suspected incidents are people-focused and the comprehensive needs of those involved is prioritised.

Scope

This policy applies to all Tetra Tech people and partners, including downstream delivery partners.

We define Tetra Tech people to include employees, locally engaged staff, project staff, interns, staff seconded to and from Tetra Tech, individual consultants, advisors, and contracted individuals.

We define Tetra Tech partners to include subcontractors and all their personnel, scholarship recipients and awardees, grant recipients.

All Tetra Tech partners are responsible for implementation of this policy with their downstream partners performing work related to the Tetra Tech contract. Tetra Tech partners are responsible for providing evidence of this application as part of our risk management process.

Tetra Tech is committed to the prevention of sexual exploitation, abuse, and harassment through the selection of our people and partners, and the conduct we expect of them. Specific mechanisms for prevention are detailed in the Tetra Tech International Development *Prevention of Sexual Exploitation, Abuse or Harassment Procedure*.

Principles



Zero tolerance of inaction

Sexual exploitation, abuse and harassment are never acceptable at Tetra Tech International Development. We recognise that a significant reduction is a long-term endeavor. Zero tolerance is not the same as zero incidents. For the purpose of this policy, Tetra Tech defines zero tolerance as acting on every allegation in a fair and reasonable way and with due regard for procedural fairness.



Victims and survivor needs are prioritised

Actions regarding this policy will ensure victims, survivors and whistle-blowers feel safe, report concerns and be assured their allegations are taken seriously. Our policy is underpinned with a 'do no harm' approach and a survivor-centred approach that respects the rights, needs, and wishes of every adult victim and survivor, while ensuring procedural fairness to all parties.



Strong leadership accelerates cultural change

Our leaders should seek to and actively take measures to improve diversity and inclusion. Our leaders are expected to set clear expectations, model respectful behaviours in line with our leadership competencies. Tetra Tech leaders will support communities, victims/survivors and whistleblowers to feel safe, report concerns and be assured their allegations are taken seriously.



Preventing sexual exploitation, abuse and harassment is a shared responsibility

Tetra Tech recognises real changes are affected when everyone plays a role. Responsibility for preventing sexual exploitation, abuse and harassment is shared by all Tetra Tech people to ensure a safe work environment. It is embedded through demonstrating our values and culture.



Gender inequality and other power imbalances are addressed

Tetra Tech acknowledges there are multiple levels of disadvantage. Tetra Tech recognises that the likelihood of experiencing sexual exploitation, abuse, and harassment and how it is experienced varies for different individuals and groups. Engagement will be based on respect for diversity, promotion of gender equality and social inclusion, accountability, and a strong 'do no harm' focus.



Stronger reporting will enhance accountability and transparency

The victim/survivor may choose how they want the issue to be dealt with. This policy encourages more people to feel safe to report this behaviour. More reporting and appropriate responses assures victims they are in a supportive work environment. Stronger reporting also allows us to better understand risks, improve assurances, systems and safeguards.

Approach

This policy should be read in conjunction with the below documents and the *Prevention of Sexual Exploitation, Abuse or Harassment Procedure* document, which articulates how this policy works in practice.

- Tetra Tech Corporate Code of Conduct
- Tetra Tech International Development Child Protection Policy
- Tetra Tech International Development Disciplinary Policy
- Tetra Tech International Development Risk Management Framework
- Tetra Tech Inc Acceptable Use – Technology Resources Policy

Risk assessment

This policy takes a risk-based, proportional approach. Tetra Tech will assess the level of risk of sexual exploitation, abuse and harassment occurring, and apply the minimum standards as described in the *Tetra Tech Prevention of Sexual Exploitation, Abuse or Harassment Procedure,* commensurate with the level of risk identified. In other words, the higher the risk, the greater the controls that will need to be put in to place.

At Tetra Tech it is expected that we provide a safe and respectful work environment for all our people. Furthermore, our values are the cornerstone of our culture and our goal of a highly diverse and inclusive workplace is embedded in our Strategy and for that reason we will hold ourselves to the highest standards as required by this policy.

The Tetra Tech International Development Risk Management Policy incorporates sexual exploitation, abuse, and harassment risk assessment. Sexual exploitation, abuse and harassment risk assessment, planning and management processes.

Breach of policy

A breach of this policy by a Tetra Tech person or partner may result in:

- Disciplinary counselling
- An official warning
- A requirement to attend discrimination and harassment awareness training
- A requirement to provide a formal apology to the victim
- Disciplinary action (e.g. demotion, transfer, suspension, probation or dismissal)
- Participation in mediation to restore relationships in the workplace.

Reporting Channels

Response to incidents

Tetra Tech's policy has a zero tolerance policy of inaction as a result of a complaint. Reporting is for any suspected or alleged cases of sexual exploitation, abuse or harassment perpetrated by anyone within scope of this policy in connection with official duties or business.

If in doubt, suspected or alleged incidents should be reported.

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