

Preventing Sexual Exploitation, Abuse and Harassment Policy

1. Purpose

The International Dzogchen Community of Namgyalgar (IDCN) Preventing Sexual Exploitation, Abuse, and Harassment policy (PSEAH) outlines IDCN's approach to prevent and manage SEAH incidents and reports across the organisation.

2. Scope

The PSEAH policy applies to all people representing or working on behalf of IDCN (personnel), including: Gakyil members, teachers, instructors, employees, members, volunteers, visitors, accompanying dependants and contractors. It also applies to any organisation or individual who is hiring Namgyalgar facilities.

The policy covers incidents related to IDCN program participants, community members, visitors, all personnel, and accompanying dependents. It also covers incidents in a program run on Namgyalgar, by those hiring facilities.

3. Policy Statement

IDCN upholds the right of all people to live a life free from sexual violence, exploitation, and harassment regardless of their gender, age, sexual orientation, disability, religion, or nationality. The IDCN has zero-tolerance for sexual exploitation, abuse, and harassment (SEAH) of any kind. We recognise that some individuals may be more vulnerable to SEAH, including; children and vulnerable adults. We are committed to creating a safe and supportive environment that safeguards all the people we work with, and the teachings we work for.

We recognise that our teachers, instructors, staff, volunteers and organisation hold a privileged position and that there are unequal power dynamics within our organisation and with the students who practice and learn in our programs. We understand that we are trusted by participants, community members, donors, and members of the public to take reasonable measures to prevent and manage the hazards involved in the delivery of our work and to appropriately investigate and report incidents if they occur.

The IDCN is committed to prevention through awareness-raising and building our safeguarding capacity. The IDCN will not tolerate personnel associated with the delivery of its work engaging in activities related to SEAH. The IDCN expects all personnel to uphold our values and standards of behaviour as representatives of our organisation. IDCN personnel are required to contribute to creating a safe and supportive culture where individuals are comfortable to raise concerns and feel assured that all reports will be handled sensitively and appropriately.

4. Guiding principles

- **Safeguarding adults and children:** The IDCN recognise the inequality between genders, between teachers, instructors, practitioners, visitors and volunteers and the unequal power dynamics, which may also exist within an organisation. We recognise that intersections between these factors may create a vulnerability

to SEAH. The IDCN expects personnel in all their interactions to respect diversity, promote gender equity, social inclusion, encourage accountability, and to take a strong "safeguarding" approach.

- **Act to prevent and report SEAH:** The IDCN requires that all personnel take measures to prevent the occurrence of SEAH. All personnel are required to report any suspicions or SEAH concerns related to IDCN activities or work, or that of organisations hiring our facilities.
- **Shared responsibility and accountability at all levels of the organisation:** All IDCN personnel at all levels of the organisation, have a responsibility to contribute to a culture which prevents and encourages reporting of SEAH. Teachers, instructors and program coordinators, at all levels are responsible for supporting and overseeing the implementation of this policy within their respective areas, while the Gakyil and the Namgyalgar caretaker have overall accountability for the implementation of the policy.
- **Transparency and accountability:** The IDCN is committed to ensuring that program participants, members, personnel, and members of the public are able to access information on our policy and know how to report incidents or concerns related to IDCN work. Information is made accessible through the administration officer, the Gakyil, the Namgyalgar caretaker and is available on the website. The IDCN treats any reports seriously, conducting the investigation, maintaining confidentiality and procedural fairness.
- **A survivor-centered approach:** The IDCN prioritises the rights, wishes, needs, and empowerment of survivors of SEAH in both the prevention of and response to SEAH incidents.

5. Working with other organisations

The IDCN requires that all organisations using the Namgyalgar facilities have an equivalent standard of and commitment to safeguarding practices which prevent sexual exploitation, abuse, and harassment. The Namgyalgar caretaker is responsible for they understand this policy and ensuring they sign the IDCN Code of Conduct as part of the standard agreement.

The agreements outline the process for any breaches of the terms of the agreement, including; failure to report any incidents or concerns regarding PSEAH or failure to take corrective action if SEAH during the period of use, which may result in a ban on the organisation using the facilities again and/or reporting to authorities.

6. Standards of conduct

IDCN personnel must abide by the code of conduct and the organisations' policies when delivering programs in Australia. The PSEAH standards of conduct listed below are articulated into the organisation's Code of Conduct.

Personnel are required to sign the documents acknowledging their understanding of the PSEAH Policy and Code of Conduct.

The IDCN sets high expectations of all personnel and prohibits SEAH related behaviours;

- The IDCN has zero tolerance for sexual exploitation, abuse, and harassment of any kind;
- The IDCN prohibits transactional sex (the exchange of money, employment, good or services for sex, including sexual favours) while engaged in the delivery or related to IDCN programs or activities;
- The IDCN prohibits fraternisation (any relationship that involves, or appears to involve, partiality, preferential treatment or improper use of rank or position including but not limited to voluntary sexual behaviour) while engaged in the delivery of IDCN programs and activities. IDCN personnel or related parties must inform the IDCN Gakyil president or Secretary regarding existing or emerging relationships.

- The IDCN requires paid personnel and volunteers to disclose all charges or convictions related to Child Abuse or SEAH that occurred prior or occurs during engagement with IDCN;
- The IDCN requires personnel to report any concerns, suspected or alleged incidents of Child Abuse or SEAH;
- The IDCN has zero tolerance for all forms of exploitation, abuse, harassment or harm of children and requires all personnel and partner organisations to report any concerns. See Child Protection Policy and Code of Conduct for SEAH related to children.

7. Reporting

The IDCN aims to create a safe and supportive environment where personnel, program participants, and members of the public can raise concerns. All IDCN personnel in Australia are required to report concerns or incidents regarding SEAH immediately. The IDCN takes all reports seriously and will respond immediately.

Individuals reporting SEAH in good faith or assisting investigation processes will be supported and protected by this policy without fear of retribution. Malicious reporting to harm another person's reputation or integrity will be treated as a breach of the Code of Conduct.

IDCN's Anti-Discrimination, Harassment and Bullying Policy provides additional information and reporting processes for incidents related to harassment.

What to report	Who to report to and when
For reports of exploitation, abuse or harassment of individuals under the age of 18 years	Follow the reporting process and timeframes outlined in the Child Protection Policy
Allegation, disclosure, or witness of sexual exploitation, abuse, or harassment involving; a teacher, IDCN personnel, community member, contractor or person involved in IDCNs work or related activities.	1. Program coordinator , Namgyalgar caretaker or a Gakyil member immediately 2. PSEAH focal person immediately. 3. The report will be escalated to the Gakyil. 4. Reports made to local authorities as required.
Breach of policy code of conduct, policy non-compliance, or concerns regarding PSEAH implementation of IDCN work or related activities.	1. Program coordinator , Namgyalgar caretaker or a Gakyil member immediately 2. PSEAH focal person immediately 3. Report will be escalated to Gakyil.
Concern of serious misconduct or wrongdoing (can be made anonymously)	1. Report through Complaints/Whistle-blower reporting mechanism via the website.
Other concerns outside of those listed and for advice regarding SEAH	1. Program coordinator , Namgyalgar caretaker or a Gakyil member or PSEAH focal person.

Reports or concerns may be made through the website or directly to IDCN Australia's PSEAH focal person via safeguarding@dzogchen.org.au.

8. Complaint handling and investigation

Any person can report a safeguarding concern either verbally or in writing to any IDCN employee, Gakyil member, or the PSEAH Focal person.

- All reports will be responded to in a professional and timely manner.
- All concerns or allegations will be taken seriously and investigated and acted upon where appropriate and in line with our safeguarding principles and policy.
- All PSEAH reports will be treated with respect, sensitivity, and confidentiality, and reports de-identified as aligned with a survivor centred approach.
- IDCN will carry out a respectful and discreet investigation which follows due process, ensures the duty of care to all involved, and is guided by the wishes of the survivor.
- IDCN will protect the privacy of alleged perpetrators, survivors, and whistle-blowers.
- IDCN will report any incidents that involve a criminal aspect to the correct law enforcement authorities.
- For any reports or incidents related to children under 18 years of age, follow the reporting process and timeframes outlined in the Child Protection Policy.
- Any reports which do not fall within the scope of the policy will be assessed and maybe referred to another organisation. IDCN Australia will provide referrals as appropriate including to medical services, psychosocial support through the IDCN Australia's Employee Assistance Program or to specialised children's or women's services.
- Survivors will be provided with information on the progress of any investigation and outcomes.

9. Breach of the PSEAH Policy or Code of Conduct

All individuals and groups listed under the scope of the policy are required to comply with and report any breaches of the PSEAH Policy or Code of Conduct.

Failure to comply with or report breaches of these policies may result in disciplinary action, suspension, dismissal, or termination of engagement.

Criminal activities or conduct will be reported to the relevant authorities, where it is safe to do so, required by legislation and is in accordance with the wishes of the survivor.

10. Organisational Accountability

IDCN Gakyil	• Overall accountability and responsibility for this policy and its implementation • Ensure that program leads have access to regular training and information.
IDCN Caretaker / Gekos	• Accountability and responsibility for ensuring the policy is implemented within all programs on Namgyalgar. • Ensure PSEAH incidents on the Namgyalgar property are appropriately managed and responded to

IDCN Program Leads/ Teachers	• Promote awareness of the PSEAH policy • Responsible for the oversight, implementation, and contributing to the development of systems to ensure PSEAH practices are embedded in their work. • Oversight of risk management strategies and processes
IDCN Program Teams	• Promote awareness of the PSEAH policy • Responsible for implementation and contributing to the development of systems to ensure PSEAH practices are embedded in their work. • Contribute to organisational reviews of the PSEAH and program-related procedures. • Ensure relevant all Partner organisations, volunteers, and other persons involved in IDCN activities have an awareness of IDCN's PSEAH policy, how to implement risk management strategies, and report any concerns. • Implement risk management strategies and processes
All IDCN personnel; Staff Members, Program Contractors (eg Childcare, Catering) and Volunteers	• All IDCN personnel are required to comply with the PSEAH policy, procedures, and Code of Conduct. • Report any incidents, concerns, or breaches of the policy immediately to relevant IDCN staff.
PSEAH Focal Person	• Support response to SEAH incidents, concerns, and reports. Conduct initial due diligence on the report, coordinate investigation or liaise with internal reporting structures or external investigator if required. • Raise awareness of SEAH across organisation and support departments to embed safeguarding and safe programming practices.

Communications and Review

IDCN is committed to developing materials to support the communication of IDCNs approach to PSEAH, behavioural expectations of personnel, and reporting processes.

11. Definitions

CHILD/CHILDREN	In accordance with the United Nations Convention of the Rights of the Child, 'child' means every human being under the age of 18, unless earlier under the law applicable to the child. The IDCN considers a child to be a person under the age of 18 years.
CONTRACTOR	Any longer term contracting arrangement that requires extended time with course participants for example catering contractors or childcare contractors. It does not include short term contractors eg: plumbers, electricians.
FRATERNISATION	Any relationship that involves, or appears to involve, partiality, preferential treatment, or improper use of rank or position including but

	not limited to 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.
SEXUAL ABUSE	The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual offences including but not limited to: attempted rape (which includes attempts to force someone to perform oral sex); and sexual assault (which includes non-consensual kissing and touching). All sexual activity with someone under the age of consent is considered to be sexual abuse.
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 sexual exploitation of another.
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. 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 to be 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 favour
SURVIVOR	A person who is, or has been, sexually exploited, harassed or abused.

12. Interaction with other policies and documents

- [Complaints & Dispute Resolution Procedure](#)
- [Reporting Form](#)
- [Privacy Policy](#)
- [Code of Conduct](#)
- [Child Protection Policy](#)
- [Equal Opportunity and Anti-Discrimination Policy](#)
- [Whistleblowing Policy](#)
- [Dispute Resolution and Complaints Handling Policy](#)

Alignment with international laws and conventions.

IDCN complies with the Australian and local legislation, and continuously works to strengthen our safeguarding capacity across the organisation.

13. Version Control.

The **IDCN** will review and update this policy every three (3) years, unless changes are required earlier, to ensure relevance and applicability.

	Written/ Revision By:	Approved By:	Next Review Date:
Person:	Eleanor Loudon	Gakyil	3/9/2026
Date:	21/7/2023	3/9/2023	