



GEDSI and Preventing Sexual Exploitation, Abuse and Harassment Policy 2022 – 2027

Introduction

TSCL/LSIH Consulting Limited is committed to inclusion in person with disability program, Gender equality, acknowledged Child right and preventing sexual exploitation, abuse and harassment in the organisation and vulnerable people in the community. TSCL/LSIH does not tolerate abuse and harassment and exclusion of Person with Disability. We believe in equal opportunity for both men and women and their right to participate in development program. This applies to our own organization and extends to those we work with.

For the purpose of this policy, it applies equally in [TSCL/LSIH Consulting Limited](#) and [Lae SME Incubator Hub](#) – nominated in this policy collectively as [TSCL/LSIH](#)

TSCL/LSIH strives for a society in which no one is left out. We believe that this can only be achieved if all members of society have the full and equal opportunity and ability to participate in social and economic activities so as to improve their lives, and the lives of their families and communities. This goal is achieved by, understanding of factors of marginalisation and exclusion, and commitment to adopting approaches and strategies to overcome these factors in order to help communities meaningfully and sustainably lift themselves out of poverty.

Values

It is our passion to improve the family and work lives of PNG Nationals. To have them believe in their self-worth and have confidence in what they do, who they work for and to become owners of PNG Businesses or Business Managers & Leaders. Our values are based on ethics, honesty, leadership, rolemodel and respect for all.

Mission

The mission of TSCL/LSIH Consulting is to provide high-level support, mentoring and guidance to PNG organizations, businesses, and staff, of all sizes. Improving growth and financial security for both PNG individuals and businesses. by mentoring and development of skills and attributes, to a new level whilst paying respect and homage to the diverse, multicultural history of this great country.



Background

People suffer marginalisation and exclusion on the basis of race, religion, ethnicity, indigeneity, disability, age, displacement, caste, gender, gender identity, sexuality, sexual orientation, poverty, class or socio-economic status. People who are subject to discrimination on these grounds face unique barriers to participation in social and economic activities and consistently suffer worse social and economic outcomes than the rest of their communities. Their marginalisation and exclusion persist due to, a lack of understanding and respect for the human rights of all people regardless of their identities.

Often vulnerable people are left out from decision making on issues affecting their interests and face challenge and change entrenched stereotypes due to their vulnerability. This happens when People fail to understand and address structural and power imbalances in society. To address inequalities and inequities faced by marginalised groups TSCL/LSIH Consultant run inclusive program that improves the social and economic outcomes. Although it is not enough to design targeted development programs for those group ,It is necessary to understand and address the root causes of discrimination and inequity within our organisation and through our work. In this holistic way, we can contribute to achieving meaningful, sustainable, transformative change for well-being and inclusive development.

Status of Policy

This Policy is the first draft of TSCL/LSIH Acknowledgement of

- Gender Equality in a development space
- Disability Inclusion
- Human Rights in development
- Preventing Sexual Exploitation, Abuse and Harassment at work- place [this includes any offer, request or payment for transactional sex.](#)

Any agreement entered into by TSCL/LSIH including agreements with TSCL/LSIH will be taken as a reference to this Policy. This Policy will be disseminated to all TSCL/LSIH Staff, volunteers, and Partner Staff and its Clients.

Scope

This Policy applies to all of TSCL/LSIH Limited's activities. All TSCL/LSIH Staff, volunteers, Board Members/Management and Partner Staffs and Clients are required to read and familiarise with this Policy.



TSCL/LSIH is committed to:

1. respecting and promoting the human rights of all people, regardless of race, religion, ethnicity, indigeneity, disability, age, displacement, gender, gender identity, sexuality, sexual orientation, poverty, class or socio-economic status
2. including and representing in our work those who are vulnerable and those who are affected by the intersecting drivers of marginalisation and exclusion
3. embedding these commitments in our work through an intersectional approach which seeks to understand and address the overlapping and compounding ways in which people experience discrimination, marginalisation and exclusion. In this context, Gender Equality, Disability and Social Inclusion (GEDSI) Policy aims to ensure that TSCL/LSIH undertakes its work through the lens of gender equality and social inclusion in order to:
 - empower women and advance gender equality
 - empower people with disabilities and promote their human rights so they can achieve economic self-sufficiency, freedom, choice and dignity
 - protect and promote the rights and support the reintegration efforts of abused persons
 - ensure that other vulnerable groups are identified and included in TSCL/LSIH Limited's development efforts so that no one is left out.

This Policy aims to do so by:

1. setting out our understanding of how marginalisation and exclusion impacts our work;
2. establishing guiding principles on GEDSI so that we can make decisions and take actions that are consistent with our commitment to GEDSI
3. developing our approach to incorporating GEDSI considerations in all our development work and across all aspects of our organisation.

Importance of GEDSI to TSCL/LSIH

this further elaborates the Importance of GEDSI and the understanding the context and barriers relevant to the drivers of discrimination most commonly present in the communities in which TSCL/LSIH works.

Gender

Gender equality means the state in which individuals have equal conditions for realizing their full human rights and for contributing to, and benefiting from, economic, social, cultural and political development, regardless of their sex and gender. It equally values the similarities and the differences of men and women, and the roles they play. It is based on women and men being full partners in their home, their community and their society.

1. Achieve gender equality by simply promoting and creating platforms or initiatives that provide equal opportunity and treatment to men and women, girls and boys. Gender equity initiatives are necessary to truly place women and men on a level ground.
2. When women and girls are discriminated against and are excluded from accessing resources, services or productive activities, this not only affects their development, but it negatively affects a vulnerable community's capacity to increase its economic growth and development and to raise its living standards. Women bear a disproportionate burden of poverty and face many barriers to participating in income-generating activities. In addition, due to entrenched power imbalances and stereotypes, women and girls suffer disproportionately to men and boys in sexual and gender-based violence. TSCL/LSIH therefore prevents factors that intensifies Gender Inequality.
3. By addressing gender inequality in our programs, TSCL/LSIH has the opportunity to shatter negative stereotypes and attitudes regarding the participation of women in income-earning roles, and challenge the power imbalance and culture of discrimination that allows gender-based violence to continue.

Disability

A person with a disability is someone with an episodic or long-term physical, mental, intellectual or sensory impairment which, in interaction with various barriers, may hinder their full and effective participation in society on an equal basis with others.

1. People with disabilities make up 15% of the world's population and are the largest and most disadvantaged minority in the world. Therefore, TSCL/LSIH promotes inclusion initiative that gives equal opportunity for Person with Disability to



Participate and be informed.



2. TSCL/LSIH acknowledge the fact that People with disabilities and their families are more likely to be poor and to remain poor due to stigma, lack of accessibility, discrimination, higher living costs, barriers to education, health and employment opportunities, and unpaid caring responsibilities. With the economic initiative program, PWD are given equal opportunity to earn income, manage their Micro SME and participate in decision making.

Prevention of Sexual abuse and harassment at Work Place and Communities

This section applies to TSCL/LSIH employees, advisors, consultants, volunteers, partners.

Key Definitions –

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 sexual exploitation of another.
2. 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).
3. 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.
4. Transactional Sex – Any offer, request, bribe or favour in return for Transactional Sex is prohibited. This includes verbal, email, social media or any other forms in which this unwelcome request may be imposed.

Strategies & Practice of Child Protection

1. Recruitment and Screening Measures Tok Stret's recruitment procedure for recruiting and screening staff that are in, including but not limited to:
 - Criminal record check before engagement
 - Documented verbal referee checks
 - Interview plans incorporating behavioural based questions



- Statutory declaration or disclosure statements in circumstances where a reliable police check cannot be obtained.

REFER to TSCL/LSIH Child Protection Policy

Code of Conduct TSCL/LSIH Services

Code of Conduct set out professional behaviour expectations of personnel. The code of conduct is required to be signed by all TSCL/LSIH staffs as part of their contract agreement. Refer to the code of conduct. Safeguarding training TSCL/LSIH will provide safeguarding training to personnel and partners to ensure they are informed and aware of the policy, procedures and reporting requirements as well as to strengthen the knowledge and capacity to ensure safe work environment.

The training manager is responsible to provide safeguarding training at the orientation for new staffs. Refresher training will be provided to staffs annually. Sexual Exploitation, Abuse and Harassment Risk Assessment TSCL/LSIH has robust risk assessment procedure in place to manage and mitigate risks of harm to children as a result of the organisation's operations or activities.

TSCL/LSIH conduct risk assessment and develop risk management plans, risk register that is reviewed and updated regularly during the life of the activity/project and that help to identify risks and document steps being taken to reduce or remove these risks.

Our GEDSI Guiding Principles

TSCL/LSIH is guided by the following GEDSI principles which apply in all its decision-making and activities. The policy is underpinned by the principles outlined below

Principle 1: Zero tolerance of inaction Sexual exploitation, abuse and harassment are never acceptable. TSCL/LSIH encourage staffs and beneficiaries to reports incidents as increases in reports indicates awareness of SEAH and changing attitudes, with victim s/survivors feeling more comfortable to report and organisations more likely to take action.

Principle 2: Strong Leadership accelerates culture change Strong leadership is essential for accelerating culture change. TSCL/LSIH recognized the leadership to set clear expectations and model respectful behaviour in their interactions at work. This will support communities, victims/survivors and whistles blowers to feel safe, report concerns and be assured their allegations are taken seriously. Strong leaders address SEAH by taking measures to improve diversity and inclusion.

Principle 3: Victim/survivor needs are prioritised Action to address SEAH should be underpinned by 'do no harm' approach prioritising the rights, needs, and wishes of the victim/survivors, while ensuring procedural fairness to all parties.



This approaches includes;

- Treat the victim/survivor with dignity and respect
- Involve the victim/survivor in decision making
- Provide the victim/survivor with comprehensive information – example referring to counselling services both internally and externally.

Principle 4: Preventing Sexual Exploitation, Abuse and Harassment, [requests or offers of Transactional Sex](#) is a shared responsibility Preventing sexual exploitation, abuse and harassment is everyone’s responsibility. To reduce SEAH and see real change, every sector plays a vital role – government, business, non-government organization, Communities and individual.

Principle 5: Gender inequality and other power imbalance are addressed

The available data indicates that majority of SEAH victims/survivors are female and majority of perpetrators are male. Inequalities based on the distinction of workers/beneficiaries, ability/disability, ethnic and indigenous status, religion, gender identity, and sexual orientation, age, health and poverty, can result in SEAH. Engagement with intended beneficiaries should be based on respect for diversity, promotion of gender equality and social inclusion, accountability and a strong do no harm’ focus

Principle 6: Stronger reporting will enhance accountability and transparency Sexual exploitation, abuse and harassment is a failure of responsibility. The organizations and individuals who are engaged in TSCL/LSIH project activities are not only accountable to TSCL/LSIH but also to the communities, clients for whom the business is intended. Stronger reporting enable TSCL/LSIH to better monitor SEAH and GEDSI risk and apply appropriate mitigation strategies to improve safeguarding in the organisation.

Principle 7: We believe everyone has the right to equality and inclusion All members of society have the equal rights and opportunities to participate as beneficiaries and agents of social and economic development, regardless of their identity. By focusing on these rights in all aspects of our decision-making and activities, we embed GEDSI into our work.

Principle 8: We strive to address the root causes of inequality and marginalisation Transformative change cannot be achieved by addressing the symptoms of discrimination, but rather, must tackle the root causes of it. This includes gaining a deep understanding of the drivers that cause marginalisation and exclusion, developing specific programs and strategies to overcome them, and challenging norms and stereotypes through our programs, practices and advocacy.



Principle 9: We include the voices of marginalised groups in our planning and decision-making, we incorporate the perspectives, experience, knowledge and interests of women and girls, people with disabilities, and other relevant marginalised groups who are impacted by our work.

Principle 10: We understand that each context is unique in different parts of Papua New Guinea, where we undertake our work, we operate in systems with structures that oppress and marginalise certain members of the community in intersecting ways. This means we must tailor our focus based on the specific context we are working in so as to develop GEDSI strategies that are effective in addressing and eliminating the root causes of inequity and exclusion.

We do this by consulting with community members at all levels and from diverse backgrounds. In our own organisation we consult across our team to gain awareness of and overcome the barriers that affect people involved in our work.

Principle 11: We collaborate and share and evaluate our experience and key learnings in order to improve our GEDSI approach and we share our learning with Partners and other organisations within the development sector so as to contribute to and benefit from the knowledge of best practice within the sector.

Principle 12: We do no harm. TSCL/LSIH Limited's work must not cause discrimination to marginalised groups or reinforce the barriers to participation or negative stereotypes that keep people excluded from participating in the social and economic life of their communities. We have a zero-tolerance approach to discrimination on any grounds within our organisation.

Our GEDSI Approach

TSCL/LSIH applies the above Guiding Principles to its work through the following approach:

1. We collaborate with organisations who share our commitment to GEDSI. In order to undertake our work with an effective GEDSI focus, we work with Partners who share our understanding and commitment to GEDSI, and support them in developing their GEDSI approach. This involves:
 - Selecting and working with implementing Partners who are committed to promoting GEDSI in their context
 - Assisting our Partners in assessing and building their own understanding of, and capacity to implement GEDSI in their work

- Seeking input from experts and other civil society organisations to identify best practice and solutions for achieving equality and inclusion; and
 - Looking for opportunities to engage other organisations who may be more able to address needs or issues that are beyond the scope of our organisational strategy or expertise.
2. We design and implement programs that promote GEDSI
- We embed GEDSI in our programs by incorporating specific GEDSI considerations at all program design, through which we
- Assess GEDSI in our main activities (design, implementation, monitoring and evaluation) to ensure that programs are inclusive, take into account the needs of marginalised people, do not discriminate against them, and do not reinforce inequalities and barriers to inclusion
 - Develop targeted activities where possible to address the specific needs of women, girls and other marginalised groups and help level up In line with the Program design and development
 - Work with Partners during the concept development stage to identify the marginalised individuals and groups in the community, including women, people with disabilities and other marginalised groups;
 - Consult with individuals across the spectrum of the target community, including women and girls, people with disabilities and/or their representatives in order to Tailor strategies and activities to address the differences in condition and needs for each group
 - Provide opportunities to individuals from those groups, including women and girls, people with disabilities to participate in and decision-making.
3. We hold ourselves accountable
- Our GEDSI approach will only be effective if we allow for feedback, reflection and growth. To achieve this, we:
- Provide locally appropriate, safe and confidential mechanisms for people to provide feedback and raise concerns or complaints about TSCL/LSIH Limited, its staff, volunteers, or activities, and those of its Partners— currently implemented through our Safeguarding Policy and Complaints Handling and Whistleblowing Policy.
 - Periodically assess our own GEDSI practice in the organisation, the degree to which the policy is being implemented, and incorporating lessons learned into future policy and strategy design



GEDSI Incident Reporting Process

TSCL/LSIH has reporting procedure for any suspicious, allegations or incidents of sexual exploitation and abuse, Child Abuse, Abuse of Person with Disability, including policy/code of conduct non-compliance.

Refer to the below:

- all incident or allegations to the TSCL/LSIH Owner/Manager
- All complaints are handled in confidentiality
- TSCL/LSIH has zero tolerance of sexual exploitation and abuse of any staff breached the code of conduct or and policy non-compliance will be dealt accordingly. Serious misconduct will lead to termination of employment contract, suspension and dismissal. For investigating cases the staff involved in incidents can be transferred to other duties for procedure fairness in investigation.
- TSCL/LSIH provide referral support services to the staff or to those impacted. The staffs involved in the reporting process are also required to access external counselling services.
- Include measurable GEDSI-specific outcomes and indicators in the Activity Plan (used for monitoring and evaluating each program), including by collecting gender and disability disaggregated data in our programs;
- Evaluate programs to reflect on the GEDSI outcomes, discussing those evaluations with staff, Partners and relevant stakeholders and incorporating the lessons learned in future programs. We implement GEDSI in our organisation TSCL/LSIH Limited's commitment to GEDSI is reflected in the way we carry out our work. We do this by:
- Developing a five-year GEDSI strategy to steer TSCL/LSIH Limited's GEDSI approach, and incorporating GEDSI considerations in our five-yearly Organisational and Country Strategies;
- Promoting diversity, equity and inclusion in the organisation by providing equal employment and volunteering opportunities within TSCL/LSIH by removing unlawful barriers to participation;
- Fostering a gender and disability-sensitive workplace that is safe, which protects against discrimination and harassment in the workplace and which has accountability mechanisms to address harassment issues, as set out in our Organisational Policy and Safeguarding Policy
- Ensuring that all TSCL/LSIH Staff, Management, and any Partner Staff involved in TSCL/LSIH activities understand and sign the Organisational Code of Conduct and Safeguarding Code of Conduct



- Utilising gender and disability inclusive language in our communications, and refraining from using language that reinforce negative stereotypes, in adherence with our Ethical Communications Policy.

Reviewing this Policy

This policy is to be reviewed every five years, or earlier if appropriate as required by Management

Approved and Authorised by

Witnessed by

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