



## Pacific Conference of Churches Code of Conduct

### 1 Introduction

The Pacific Conference of Churches (PCC) maintains the highest standards of behaviour and accountability in all aspects of our work and promotes these standards actively in our relations with our partners, supporters, member churches, National Councils of Churches and the people with whom we work in all our programs. These standards are consistent with our values and the PCC By-Laws (2002).<sup>1</sup>

This Code of Conduct gives effect to PCC's Professional Conduct Policy and is to be signed annually by PCC-Representatives.

PCC recognises that PCC Representatives have private lives and are often volunteers or staff of other organisations. However, PCC has a legitimate interest in our Representatives' private activities to the extent that these activities may bring discredit upon PCC in its relationships with beneficiaries, counterparts, host government, donors, visitors or the public at large and may possibly call their fitness for continued employment into question. In determining whether an employee's activity or conduct is outside the provision of the Code, due regard will be taken of the following factors:

- The nature and circumstances of the activity; or,
- The position, duties, and responsibilities of the employee; or,
- The consequences of the activity on the ability of the representative to fulfil their duties and responsibilities; or,
- The effects of the activity or its consequences on relationships of PCC with our beneficiaries, counterparts, host government, donors or the public at large.

While the Code sets out a list of specific behavioural expectations, PCC considers as unacceptable any behaviour or activities which:

- Harm those people we are present to support; or
- Negatively affects their own or another's performance or has the

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<sup>1</sup> This Code also reflects the principles and requirements of the Department of Foreign Affairs and Trade (DFAT) Child Protection Policy, Preventing Sexual Exploitation, Abuse and Harassment Policy, and Social and Environmental Safeguards Policy.

- potential to do so; or,
- Is fraudulent; or,
- Embarrasses PCC or threatens its reputation; or,
- Embarrasses other overseas aid agencies or threatens their reputations; or,
- Could result in the representative being charged and/or convicted of a criminal offence which, in the opinion of PCC, brings into question their continued suitability to remain as an employee; or,
- Otherwise breaches the obligations created under the Code.

Representatives have an obligation to disclose any activity, conduct or the existence of any allegation, charge or offence that could possibly call their fitness for continued employment into question. Failure to disclose behaviour/activities which are considered unacceptable, may result in disciplinary action being taken against them and could lead to dismissal.

## 2 Values and Behaviour

PCC representatives **must**:

- a) Act in ways consistent with the Christian principles underpinning the work and service of PCC;
- b) Ensure their personal and professional conduct is, and is seen to be, of the highest standard and in keeping with PCC's Vision and Mission and policies and does not bring PCC into disrepute.
- c) Respect and promote fundamental human rights without discrimination, regardless of race, religion, ethnicity, indigeneity, disability, age, displacement, caste, gender, gender identity, sexuality, sexual orientation, marital status, political affiliation, poverty, class or socio-economic status.;
- d) Contribute to a work environment that is fair and equitable and act with honesty and good faith, treating all other PCC representatives with respect and dignity;
- e) Help to build a harmonious workplace based on team spirit, mutual respect and understanding;
- f) Treat all communities with whom we work fairly and with respect, courtesy, dignity and according to International Laws and Standards;
- g) Uphold the highest standards of accountability, efficiency, competence, integrity and transparency in decision-making, especially as such decisions involve and impact PCC's partners and other stakeholders;
- h) Act in accordance with health safety and security guidelines and endeavour to safeguard others;
- i) Be familiar with their rights and responsibilities as articulated in this Code of Conduct and other relevant PCC Policies and Procedures;
- j) Contribute to, and take ownership of, decisions that support achievement of the mission and vision of PCC;
- k) Respect the role and decisions of PCC's General Assembly, Executive Committee, Finance and General Business Committee and management;

- l) Promote a strong team by acknowledging the work of others and, as appropriate, providing constructive feedback on their contribution to the work of PCC;
- m) Respect other staff, partners and stakeholders by maintaining an appropriate level of confidentiality while working for PCC
- n) Understand and adhere to the PCC Travel Policy<sup>2</sup> and relevant Employment Policy<sup>3</sup>;
- o) Workplace Health and Safety policies<sup>4</sup> as well as being familiar with the corresponding policies of its partners; and comply with relevant laws of the country in which they are working.

PCC representatives **must not**:

- a) Misuse alcohol or other drugs which may adversely affect their work or service, the safety of colleagues or the reputation of PCC
- b) Work while under the influence of drug related substances or alcohol that inhibit the ability to perform duties;
- c) Drive a vehicle while on duty while under the influence of alcohol or any illegal substance.
- d) Use the position of power conferred by their role to exert pressure, gain economically, professionally or sexually, or extract or accept favours, bribes, gifts or other forms of personal enrichment; or
- e) Use or possess weapons or ammunition of any kind while on duty.<sup>5</sup>

### 3 Child Safeguarding (refer to PCC Child Protection and Safeguarding Policies)

PCC Representatives **must**:

- a) Treat children with respect regardless of race, religion, ethnicity, indigeneity, disability, age, displacement, caste, gender, gender identity, sexuality, sexual orientation, marital status, political affiliation, poverty, class or socio-economic status;
- b) Exercise care in providing gifts to children. Small gifts to groups of children may be acceptable, but should be considered against the possibility that the gifts compound a power dynamic which does not advantage the child. Gifts to individual children could be perceived as tools for grooming children for abuse and should be avoided;
- c) Wherever possible, ensure that another adult is present when working in the proximity of children and allow the child to select their chaperone (parent, teacher, agency staff etc);
- d) Ensure contact with children, young people and vulnerable adults (whether by phone, online or direct contact) is

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<sup>2</sup> Under development.

<sup>3</sup> Ditto

<sup>4</sup> Ditto

<sup>5</sup> If the use of a weapon or ammunition is required for use on PCC's Eco-Farm this will be managed by the Asset Management Unit in accordance with Laws of Fiji and the Finance and General Business Committee resolutions.

supervised, accompanied, or at least in sight of other adults.

- e) Comply with all relevant Fiji laws and regulations related to child labour, including adherence to the Conventions on ILO Minimum Wage (1973) and the Worst Forms of Child Labour (1999), and Convention on the Rights of the Child (1989).
- f) Immediately report concerns or allegations of child exploitation and abuse and policy non-compliance, following the Procedures as outlined in the PCC Child Safeguarding Policy;
- g) Immediately disclose all charges, convictions and other outcomes of an offence, which occurred before or occurs during their association with PCC that relate to child exploitation and abuse. Ensure that verification against the Registration of the Sex Offenders Act (2018) is conducted by the management; and
- h) Be familiar with and apply the letter and spirit of the Child Protection Policy in all circumstances (refer currently developed Safeguard and Protection Policy).

PCC representatives **must not**:

- a) Use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
- b) Engage children in any form of sexual intercourse or sexual activity, including paying for sexual services or acts;
- c) Invite unaccompanied children into their place of residence, unless they are at immediate risk of injury or in physical danger;
- d) Sleep close to unsupervised children unless absolutely necessary, in which case they must obtain the supervisor's permission, and ensure that another adult is present;
- e) Use any computers, mobile phones, video cameras, cameras or social media inappropriately, and never exploit or harass children or access child exploitation material through any medium;
- f) Provide alcohol or drugs to children;
- g) Use physical punishment on children; or
- h) Hire children for domestic or other labour which is inappropriate to their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.

#### 4 Sexual Exploitation, Abuse and Harassment (SEAH)

PCC Representatives and implementing partner staff **must**:

- a) Understand that sexual exploitation, abuse and harassment by staff constitute acts of gross misconduct and are therefore grounds for termination of employment;
- b) Take reasonable action to protect others from harm and to challenge infringements into the rights of others.
- c) Act in accordance with health, safety and security guidelines and endeavour to safeguard others.

- d) Declare to their supervisors any relationships that could be construed as a conflict of interest or fraternisation.
- e) Immediately report concerns or allegations of SEAH and policy non-compliance in accordance with appropriate procedures. These are outlined in the Safeguarding Policy. Matters of a criminal nature will be immediately reported to local authorities, unless this is contrary to the wishes of the survivor;
- f) Immediately disclose all charges, convictions and other outcomes of an offence, which occurred before or occurs during their association with PCC that relate to SEAH;
- g) Understand that the exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is totally unacceptable and is prohibited;
- h) Inform his or her manager if they engage in a sexual relationship with a member of the recipient community and/or with another employee, in countries where PCC may directly implement development work, in order to prevent the perception of a conflict of interest or fraternisation; and,
- i) Be aware of, and abide by, the specific child-related provisions outlined in Section 3 of this Code.

PCC representatives **must not**:

- a) Abuse a position to withhold development assistance, or give preferential treatment, in order to solicit sexual favours, gifts, payments of any kind, or advantage;
- b) Engage in sexual relationships with members of crisis-affected populations as such relationships are based on inherently unequal power dynamics and undermine the credibility and integrity of humanitarian aid work
- c) Exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes the exchange of sexual favours for assistance that is due to communities we assist or partners we work with; also known as transactional sex.
- d) Fraternise with beneficiaries.
- e) Take advantage of a position of power to enter into a relationship with a colleague
- f) Use their power or position to withhold assistance or services, or to give preferential treatment.
- g) Identify survivors of sexual exploitation, gender-based violence or abuse as such.
- h) Reveal an individual's status as a person living with HIV, TB or any other serious health conditions without written consent.
- i) Identify an individual's engagement in culturally unacceptable

activities (such as promotion of child rights or challenging gender norms), or socially marginalised or criminal activities (such as engagement in sex work, or other activities that are illegal in their context).

## 5 Public/Media Comment

PCC representatives **must not**:

- a) compromise PCC by publicly criticising (including via social media) the organisation, its business activities or its staff;
- b) communicate to the media any information concerning PCC or its business activities, unless they are a nominated spokesperson for PCC.

PCC representatives **must**:

- a) refer journalists to the General Secretary or the Communication Officer, who will then work with the journalist to answer their inquiry.

## 6 Photography, Video and other Media

When photographing or filming people, in PCC related contexts, PCC representatives **must**:

- a) Assess and comply with local traditions or restrictions for reproducing personal images before photographing or filming anyone, but especially a child;
- b) Obtain informed consent before photographing or filming anyone, but especially a child, where the consent of the child and a parent are required. As part of this, PCC representatives must explain how the photograph or film will be used;
- c) Ensure photographs, films, videos and DVDs present people, especially children, in a manner that is dignified and respectful and not one that is vulnerable or submissive. All people, especially children should be adequately clothed and not presented in poses that could be seen as sexually suggestive;
- d) Ensure images are honest representations of the context and the facts;
- e) Understand the reach of the internet. A picture of a child published on Fiji website can be viewed by someone in that child's community overseas, posing potential risks for the children our agency works for;
- f) Ensure images/videos do not reveal identifying information such as children's first and last names, village or school name and that captions do not ever identify children; and,
- g) Ensure file labels do not reveal identifying information about a child when sending images electronically, including by turning off the geo-tagging functions on still and video cameras and mobile phones.
- h) Notwithstanding PCC's default position to identify adults, ensure adults understand they can choose to de-identify their images if they wish and how they are named in our publications;
- i) De-identify adults if PCC or our Partners assesses that there is a potential

risk to the individual's safety if identified.

## 7 Harassment

PCC does not tolerate any form of harassment in the workplace or in any other operational context. Harassment is any form of behaviour that is not wanted and not asked for and that humiliates, offends or intimidates someone and therefore creates an offensive environment for that person.

PCC representatives **must**:

- a) Treat everyone with dignity and respect in the workplace and speak with civility and kindness, listen carefully, and consider the wellbeing of others;
- b) Understand what constitutes harassment, recognise early signs of sexual, gender, racial or other targeted forms of harassment and take swift action to prevent and resolve this.

PCC representatives **must not**:

- a) Commit any form of harassment;
- b) Engage in any behaviour likely to make the recipient feel persecuted, vulnerable or powerless;
- c) Make comments/jokes about a person's private life, the way they look, their race or disability
- d) Abuse others loudly;
- e) Make repeated threats of dismissal or other severe punishment, that do not follow PCC's standard disciplinary procedures;
- f) Make/send offensive messages (e.g. via email, telephone or other means);
- g) Significantly impair another person's work in any way such as withholding information,
- h) Remove content or alter the intent of another person's work;
- i) Maliciously exclude and/or isolate another person from workplace activities that they would normally be involved in;
- j) Make persistent and unjustified criticisms, about petty, irrelevant or insignificant matters;
- k) Humiliate another person through gestures, sarcasm, criticism and insults;
- l) Spread false information;
- m) Commit sexually suggestive behaviour, such as leering or staring; brushing up against someone, touching, fondling or hugging;
- n) Make sexually suggestive comments or jokes;
- o) Display offensive screen savers, photos, calendars or objects;
- p) Make repeated unwanted requests to go out;
- q) Make requests for sex;
- r) Make sexually explicit posts on social networking sites;
- s) Make insults or taunts of a sexual nature;
- t) Ask intrusive questions or make statements about a person's private life;
- u) Send sexually explicit emails or text messages;
- v) Make inappropriate advances on social networking sites;

- w) Access sexually explicit internet sites; and
- x) Display behaviour that may also be considered an offence under criminal law, such as physical assault, indecent exposure, sexual assault, stalking or obscene communications.

## 6 Bullying

Bullying is repeated, inappropriate, overt and covert behaviour that criticises, belittles, isolates and undermines the victim. It involves humiliation, sabotage, spreading gossip, overwork, unnecessary pressure, delaying tactics and can escalate into physical and verbal assault, sexual assault and arson.

Genuine issues about management prerogative and genuine disciplinary procedures should not be interpreted as bullying as noted in the Fiji Human Rights Commission Act 2009.

PCC Representatives **must**:

- a) Treat everyone with dignity and respect in the workplace and speak with civility and kindness, listen carefully, and consider the wellbeing of others;
- b) Understand what constitutes bullying, empower staff affected by it, develop strategies to reduce and eliminate it, and take all necessary disciplinary action against those found to have committed bullying.

PCC Representatives **must not**:

- a) Commit any form of bullying;
- b) Make unreasonable demands and impossible targets;
- c) Set restrictive and petty work rules;
- d) Force another to work longer hours;
- e) Unfairly roster and/or allocate work;
- f) Implement constant, intrusive surveillance or monitoring;
- g) Fail to undertake adequate levels of consultation;
- h) Interfere with personal belongings;
- i) Sabotage others' work;
- j) Shout abusive language;
- k) Make an open or implied threat of dismissal or demotion.

## 7 Ethical Business Practices and Preventing Financial Wrongdoing

PCC representatives **must**:

- a) Promote a culture of honesty and openness among PCC staff and management;
- b) Be transparent in all work-related financial transactions;
- c) Ensure that financial and other resources are used solely for the intended purposes. This applies also to any other income generated by PCC activities, such as any interest received or earned on the funds.
- d) Work to implement effective prevention strategies to minimise the risk of wrongdoing.



- e) Always use arm's-length transactions.
- f) Foster a work environment where communities and staff can safely and confidentially raise and report all serious concerns about suspected fraud and corruption;
- g) Conduct all business in accordance with internationally accepted practices and procedures and uphold the highest standards of accountability and transparency in relations to finances, management and governance, where relevant.
- h) Follow transparent, accountable and honest practices when receiving cash donations from the public earmarked for humanitarian or development purposes;
- i) Declare any known or potential conflicts of interest to their employer (as outlined in the PCC Conflict of Interest Policy);
- j) Pay compulsory State taxes and comply with national business law and international standards;
- k) Comply with relevant national workplace health, safety and environmental standards in all program work;
- l) Ensure, where possible, that goods purchased are produced and delivered under conditions that do not involve the abuse or exploitation of any persons and have the least negative impact on the environment;
- m) Report any suspicious activity or link discovered between funds provided by PCC and a terrorist organisation or terrorist individual, including matches found during regular anti-terrorism checks; and
- n) Report any financial wrongdoing, either to their supervisor or through whistleblowing reporting channels.

PCC representatives **must not**:

- a) Accept a bribe in the form of money, goods or services to secure a contract for services when dealing with suppliers in any development or humanitarian work;
- b) Take part in activities that generate personal, organisational or collective profit such as buying or selling when such activities may affect, or appear to affect, PCC's credibility or integrity, or that of its partners;
- c) Share in the profits or budget leftovers as kickbacks, cuts or discounts for personal or organisational benefits;
- d) In order to gain a benefit, make improper use of:
  - i. PCC resources;
  - ii. inside information; or
  - iii. the status, power or authority as a PCC representative;
- e) Accept any gifts or other favours that may influence the performance of staff functions or duties. Gifts are defined as, but not limited to: services, travel, entertainment, material goods. In order to respect national and local traditions and conventional hospitality, minor token gifts such as pens, calendars, desk diaries, etc. can be accepted. These are articulated in PCC's Fraud and Prevention Policy;
- f) Use illegal labour, child labour or forced labour in any work area;
- g) Use or distribute products or supplies that are known to be unsafe in any

development or humanitarian setting.

- h) Commit any financial wrongdoing, including theft of funds or property, false accounting, forgery or unauthorised alteration of documents, avoiding/creating an unauthorised liability or wrongfully using information or intellectual property.
- i) Launder money, take commissions or influence tender processes for improper benefit or theft.
- j) Steal, misuse or misappropriate funds or property;
- k) Knowingly support individuals or entities involved in illegal or terrorist activities;
- l) Deliberately destroy, falsify, alter or conceal evidence material to an investigation or make false statements to investigators to materially influence or impede investigations into corrupt, fraudulent, coercive or collusive allegations.
- m) Make false accusations regarding any action by another person which is claimed to be in breach of the Code of Conduct.

## **8 Disclosure**

PCC representatives must disclose any convictions for criminal offences which occur during their employment with PCC and any prior offences for sexual exploitation, abuse or harassment or child abuse.

### **a Confidentiality**

Written and spoken information will be protected from being shared with unauthorised persons or used for a purpose other than that for which it was collected. PCC is guided by the Assembly's Privacy Policy.

**I acknowledge that I have read and understand PCC's Code of Conduct (2022) and agree that during my association with PCC I will abide by the conditions outlined in it.**

**I acknowledge that I have been given and kept PCC's Code of Conduct (2022) for my reference.**

**Name:**

**Position:**

**Signature:**

**Date:**

**Place:**

## Definitions

**Abuse:** any action or inaction that causes harm to another person. It can include physical abuse, emotional abuse, sexual abuse and neglect. It also includes abuse online and/or through mobile technology. Please see Appendix 1 for additional and expanded definitions of abuse.

**Arm's-length principle:** the condition or the fact that the parties to a transaction are independent and on an equal footing.

**Bystander:** A Bystander is person who witnesses an incident first hand, or who hears about it afterwards

**Child:** anyone under the age of 18. This is irrespective of local country definitions, including legal definitions, of when a child reaches adulthood, in line with the DFAT PSEAH Policy.

**Child Abuse:** All forms of physical or mental (especially emotional) violence, injury or Abuse, maltreatment or exploitation, including Sexual Abuse, is Child Abuse. Child Abuse occurs when adults or other children hurt children either physically, sexually, emotionally, psychologically or in some other way.

**Child exploitation and abuse:** One or more of the following:

- committing or coercing another person to commit an act or acts of **abuse** against a child;
- possessing, controlling, producing, distributing, obtaining or transmitting **child exploitation material**;
- committing or coercing another person to commit an act or acts of **grooming** or **online grooming**.

**Child exploitation material** – Material, irrespective of its form, which is classified as **child abuse material** or **child pornography material**

**Child abuse material:** Material that depicts, expressly or implicitly, a child under 18 years of age as a victim of torture, cruelty or physical abuse

**Child pornography material:** Material that depicts a person, or is a representation of a person, who is, or appears to be, under 18 years of age and is engaged in, or appears to be engaged in, a sexual pose or sexual activity, or is in the presence of a person who is engaged in, or appears to be engaged in, a sexual pose or activity, and does this in a way that a reasonable person would regard as being, in all the circumstances, offensive.

**Corruption:** Offering, giving, soliciting or acceptance of an inducement or reward which may improperly influence the action of any person.

**Discrimination:** exclusion of, treatment of, or action against an individual based on social status, race, ethnicity, colour, religion, gender, sexual orientation, age, marital status, national origin, political affiliation or disability.

**Emotional abuse:** Refers to a parent or caregiver's inappropriate verbal or symbolic acts toward a child or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability.

**Exploitation:** any actual or attempted abuse of a position of vulnerability, differential power or trust to profit monetarily, socially or politically. It includes sexual exploitation.

**Focal point:** A person or group of persons designated to receive Complaints of cases of sexual exploitation and abuse. (IASC Guidelines to Implement Minimum Operating Standards for the PSEAH 2012)

**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. (From DFAT's PSEAH policy, 2019).

**Fraud:** An intentional distortion, deceit, trickery, and perversion of truth or breach of confidence, relating to an organisation's financial, material, or human resources, assets, services and/or transactions, generally for the purpose of personal gain or benefit. Fraud is a crime involving deception or the use of false representations to gain an unjust advantage.

**Gender Equality:** The equal enjoyment by women, girls, boys, and men [and by people who are Sex and Gender Diverse] of rights, opportunities, resources and rewards.

**Grooming:** Grooming is when someone builds an emotional connection with a child or vulnerable adult to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Many children and vulnerable adults may not understand that they have been groomed or that what has happened to them is abuse.

**Harassment:** Any unwelcome comment or behaviour that is offensive, demeaning, humiliating, derogatory, or any other inappropriate behaviour that fails to respect the dignity of an individual. Harassment can be **committed by** or against any member of the community with whom we work, partners, employee, vendor or other individual visiting or doing business with an agency (see **sexual harassment** below).

**Misconduct:** or improper behaviour. A breach of PCC's Code of Conduct.

**Neglect:** The failure by a parent or caregiver to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being.

**Online grooming:** The act of sending an electronic message to a recipient who the sender believes to be under 16 years of age, with the intention of procuring the recipient to engage in, or submit to, sexual activity with another person, including but not necessarily the sender.

**Physical abuse:** The use of physical force against a child that results in harm to the child. Physically abusive behaviour includes shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning.

**Protection:** that individual basic human rights, welfare and physical security are recognised, safeguarded and protected in accordance with international standards.

**PSEAH:** Acronym for Preventing Sexual Abuse and Exploitation

**Serious Misconduct:** Conduct that is wilful or deliberate and that is inconsistent with the continuation of a person's employment contract. It is also conduct that causes serious and imminent risk to the health and safety of a person or to the reputation, viability or profitability of the employer's business.

**Sexual abuse:** the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. (IASC Guidelines to Implement Minimum Operating Standards for the PSEAH 2013)

**Sexual exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, sexually or politically from the sexual exploitation of another (IASC Guidelines to Implement Minimum Operating Standards for the PSEAH 2013).

**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.

**Short-term** refers to assignments during humanitarian crises where PCC non-national staff/representatives are in place for several days to several weeks.

**Survivor/victim:** A person who is, or has been, sexually exploited, harassed or abused (DFAT PSEAH Policy, 2019). Survivor implies strength, resilience and the capacity to survive. (IASC Guidelines to Implement Minimum Operating Standards for the PSEAH 2013)

**Transactional Sex:** The exchange of money, employment, goods or services for sex, including sexual favours (DFAT PSEAH Policy, 2019); also "The exchange of money, employment, goods or services for sex, including sexual favours other forms of humiliating, degrading or exploitative behaviour. This includes any exchange of assistance that is due to beneficiaries of assistance.

**Volunteer:** Volunteer refers to unpaid community members who participate in PCC activities for an extended or repeated period.

**Vulnerable adult:** an individual aged 18 years or over who is at greater risk of significant harm due to factors such as gender, age, mental or physical health, or because of poverty, inequality or experience of displacement or crisis. In an international development context an

example might be a person with reliance on humanitarian aid with another intersecting vulnerability such as a disability or their ethnicity.

**Whistleblowing:** A disclosure by a person about serious malpractice carried out by PCC or our representatives, for example concerns or complaints about criminal acts, abuse or exploitation