

 Caritas AUSTRALIA End poverty Promote justice Uphold dignity			
Document Name:	Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy		
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1. Organisational Commitment and Purpose of the Policy

Caritas Australia (CA) seeks to uphold the Catholic Social Teachings of Dignity of the Human Person, Subsidiarity, Participation and Solidarity in our work and interactions with others. Accordingly, CA does not tolerate any kind of sexual exploitation, abuse or harassment (SEAH). We are committed to preventing and addressing SEAH throughout our organisation, with partners, in programs and in all that we do.

CA acknowledges the privileged position that we hold in working with and accompanying the most marginalised and vulnerable throughout the world. This privilege often places us and our partners in a position of power. CA also acknowledges the privileged position that we hold in working with donors, schools, parishes and communities within Australia. CA will not tolerate the abuse of this position nor inaction when concerns are raised. Whether through CA's work domestically or internationally, we are committed to maintaining the highest professional and ethical standards as outlined in our Code of Conduct.

We are committed to continuously strengthening our approach to safeguarding and working with our partners, communities and stakeholders to ensure we do no harm. Prevention of sexual exploitation, abuse and harassment (PSEAH) is achieved by robust governance, enhancing accountability, improving awareness and training, supporting those affected and driving cultural change through strong leadership, throughout the whole organisation.

The purpose of this policy is to:

- **Outline CA's commitment and approach** to the prevention of sexual exploitation, abuse and harassment and how we address concerns if they arise.
- **Provide clear guidance** to all CA workers, on CA commitments and expectations relating to PSEAH, including expectations of behaviour and obligations to report concerns
- **Ensure CA meets its legal obligations in Australia and overseas** in respect to Sexual Exploitation, Abuse and Harassment
- **Ensure we meet and align with good practice** in the aid and development sector, including the following guidance:
 - Interagency standing Committee (IASC) – Six Core Principles Relating to Sexual Exploitation and Abuse (see section 6)

- Australian Department of Foreign Affairs and Trade (DFAT) Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy
- Australian Council for International Development (ACFID) Code of Conduct
- Caritas Internationalis: Code of Ethics and Code of Conduct for Staff; Child and Vulnerable Adults Safeguarding Policy; Anti-Harassment Policy and Complaints Handling Policy and Procedure
- Australian Charities and Not-For-Profits Commission (ACNC) External Conduct Standards
- Core Humanitarian Standards

Feedback on this and other safeguarding policies is openly encouraged from CA staff, partners, stakeholders and the communities we work with others. Feedback, as well as emerging good practice and collaborative lessons learnt across the development sector, will be used to strengthen this and related policies and procedures.

2. Scope

The PSEAH Policy applies to CA Workers.

CA Workers include:

- National Council members;
- CA employees (based nationally and internationally);
- CA volunteers;
- Independent contractors engaged by CA to undertake work for CA or CA partners and their sub partners; and
- All persons working with, or contracted by, any person or organisation engaged by CA to undertake work for, or on behalf, of CA (including persons who visit CA premises, programs or activities).

The PSEAH policy applies to all CA Workers at all times including when representing CA either within Australia or internationally.

CA partners are required to adhere to this policy through demonstrated alignment within their own policies and procedures. – see section 5 below.

Out of scope

This PSEAH Policy does not cover bullying and harassment, including sexual harassment, between CA workers. For these please refer to:

- CA's Code of Conduct;
- ACBC Workplace Bullying and Harassment Policy;
- ACBC Sexual Harassment Policy;
- CA Respectful Workplaces Procedures; and
- other People & Culture policies and procedures.

Any concerns related to children (under the age of 18) will be dealt with through the CA Code of Conduct, Child Protection Code of Conduct, CA Child Protection Policy Statement, Guidelines and Procedures.

3. Definitions

CA defines the following:

a) **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.

b) **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 18. Including sexually abusive behaviours can include fondling genitals; masturbation; oral sex; vaginal or anal penetration by a penis, finger or any other object; fondling breasts; voyeurism; exhibitionism; and exposing the child to, or involving the child in, pornography

c) **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, as well as well as CA workers.

Electronic media

CA workers and communities are regularly using electronic medium to communicate, including mobile phones, computers, the internet and social media. It is noteworthy that sexual exploitation, abuse and harm is increasingly occurring via electronic means. Therefore workers should read and understand the [Caritas Australia Acceptable Use of ICT Policy](#)

A comprehensive list of definitions can be found in annex 1.

4. Principles

The PSEAH Policy is underpinned by the following principles. These principles are adopted from DFAT's PSEAH Policy.

a. **Zero tolerance of inaction**

Sexual exploitation, abuse and harassment are never acceptable. CA recognises that achieving a significant reduction in SEAH is a long-term

endeavour and we acknowledge that the reporting of incidents may increase as a result of a growing awareness of SEAH, changing attitudes and more effective reporting mechanisms being in place.

Zero tolerance also means that CA is committed to acting on every allegation in a fair and reasonable way with due regard for procedural fairness.

b. Strong leadership accelerates culture change

CA recognises that strong leadership is essential to driving change, setting organisational culture, clear expectations and modelling respectful behaviour. Strong leadership supports communities, victims/survivors and whistleblowers to feel safe, report concerns and be assured that their allegations will be taken seriously.

CA leaders are committed to preventing SEAH and is demonstrated by taking action, including:

- Improving diversity and inclusion
- Embedding gender equality in human resource procedures
- Having a dedicated Safeguarding Focal Point in the Leadership Team supported by a Safeguarding Coordinator and Working Group
- Including standing agenda item for National Council Meetings on safeguarding, and
- Encouraging scrutiny of their own behaviour and that of senior management

c. PSEAH is a shared responsibility

CA acknowledges that PSEAH is a shared responsibility by all CA workers and should be embedded throughout all of CA's activities and organisational practices.

CA will encourage and work with partners and communities to build their knowledge, understanding and responses to SEAH base on their cultural, social and local contexts. We will also work with our partners and stakeholders to address underlying causes, advocate for change and manage cases of SEAH in line with good practice.

d. Victim/survivor needs are prioritised

CA commits to ensuring all our work is underpinned by a “do no harm” approach and prioritising the rights, needs and wishes of the victim/survivor, while ensuring procedural fairness to all parties. In taking this approach CA aims to:

- treat the victim/survivor with dignity and respect;
- involve the victim/survivor in decision making;
- provide the victim/survivor with comprehensive information;
- protect privacy and confidentiality;
- not discriminate based on gender, age, race/ethnicity, ability, sexual orientation, religion or other characteristics; and
- consider the need for counselling and health services to assist the victim/survivor with their recovery.

e. Gender inequality and other power imbalances are addressed

Available data indicates that while the majority of SEAH victims/survivors are female and the majority of perpetrators are male, other power imbalances exist in addition to gender. These Inequalities can be based on the distinctions of:

- worker/participant;
- ability/person with a disability;
- ethnic and Indigenous backgrounds;
- religion;
- gender identity;
- sexual orientation;
- age;
- health and poverty.

The intersection of gender with other various forms of inequality can further increase the likelihood of SEAH occurring.

CA is committed to working with and engaging with participants and partners to do no harm and promote gender equality, social inclusion and accountability

f. Stronger reporting will enhance accountability and transparency

CA holds itself accountable to the people we serve including beneficiaries, communities, our partners as well as our donors and the Australian community and CA workers. CA is committed to accountability and transparency through appropriate, accessible and safe reporting mechanisms. We also support our partners to do the same. Stronger reporting allows CA to better monitor SEAH, understand risks, improve systems and safeguards accordingly.

5. Working with partners

CA partners are required to have their own Safeguarding (including PSEAH) policies and procedures (or embedded in their policy framework), and a Code of Conduct. These should align to CA's and international good practice. In cases where partners do not have the required documents, the CA policies can be adopted. CA will work with partners to build their capacity and ensure they meet the standards required, through our accompaniment and training mechanisms.

Where there is any discrepancy between CA's PSEAH policy and a partner's policy the higher standard will apply.

Training for partners will include wide consultation, involving vulnerable groups, communities and partners in the development of training material. Training will be practical and cater for local and cultural differences. Tools for raising awareness and training approaches will be developed which are relevant to age, language, context and capacity. It will include scenario-based discussions about power imbalances, status and workplace cultures of the destination country and how these impact work and personal relationships.

6. Safe programming/ risk-based approaches

CA is committed to ensuring no harm (including SEAH) takes place during delivery of our programs and activities.

CA works with its partners to

- conduct thorough risk assessments of all CA programs and activities, including risk assessments of SEAH, and
- develop mitigation strategies at both the organisational and program level.

Mitigation strategies include the DFAT PSEAH minimum standards (annex 3)

CA works with partners to ensure that risk identification and mitigation strategies and capacity building activities are incorporated into program design and are reviewed through monitoring visits, evaluations, audit/assessments and ongoing program rollout.

7. Roles and Responsibilities

PSEAH is a shared responsibility and all workers have an obligation to ensure that the work we do is inclusive, dignified and safe within the organisation and with all those we work with and for.

There are certain roles within CA which have particular responsibilities to PSEAH and safeguarding more broadly.

CA **National Council** and **Leadership Team** are responsible for ensuring CA's continued commitment to PSEAH through ensuring robust policies and procedures are in place, ensuring the agencies mission, vision and values prioritise safeguarding, receiving reports on organisational activities, risk management and incident reporting.

The **Safeguarding Focal Point** (Head of International Programs) ensures that CA meets its obligations to PSEAH including the implementation of policies and procedures, receiving and managing reports and investigations and reporting to the National Council and other stakeholders.

The **Safeguarding Coordinator** supports the Safeguarding Focal Point in delivering on our safeguarding obligations and also coordinates the Safeguarding Working Group, supports International Programs team to include PSEAH in our programs and to build partner capacity and participates in sector initiatives.

Members of the **Safeguarding Working Group** are responsible for supporting their respective teams to carry out their safeguarding responsibilities and fostering an organisational culture that embodies safeguarding including PSEAH.

Local focal points should also be appointed in country offices and communities in which CA works. The focal points assist to facilitate local community engagement with PSEAH training and development and accessibility to complaints mechanisms.

8. Standards of Conduct

CA has a comprehensive Code of Conduct and Child Protection Code of Conduct that specifies the expected behaviour of staff. All staff are required to sign the Codes of Conduct indicating they have read and understood the terms.

More specifically, CA endorses the following standards of conduct from the Interagency Standing Committee Six Core Principles Relating to Sexual Exploitation and Abuse:

- 1) Sexual exploitation and abuse by CA workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
- 2) Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
- 3) Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.
- 4) Any sexual relationship between those providing humanitarian or development assistance and protection and a person benefitting from such assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of our work.
- 5) Where a CA worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
- 6) CA workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of the Codes of Conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

CA Workers must immediately inform their direct manager if they become engaged in a personal relationship which may be perceived as inappropriate or exploitative, or where real or perceived unequal power dynamics exist. CA Workers who are unsure if their relationship falls into this category should discuss the situation with their direct manager and/or a member of the People and Culture team.

9. Recruitment

CA has robust recruitment and screening processes in place which aim to prevent the recruitment or engagement of anyone who poses an unacceptable risk. For relevant policies please refer to Section 12 Related Documents. This includes:

- a) Acknowledging CA's Commitment to safeguarding in job adverts and position descriptions;
- b) Including safeguarding interview questions for all positions, with additional behavioural questions for those positions that have direct contact with or work with children;
- c) Verbal reference checks are required, with one check to be from the immediate past employer;
- d) National criminal history checks are conducted according to the Criminal History Check Policy and includes checks for each country in which the

applicant has lived for 12 months or longer over the last 5 years, and for the individual's countries of citizenship.

- e) Employment contracts will provide for the suspension of employment during investigations into breaches of CA policies. Sanctions for breaches include suspension, transfer, demotion, and termination of employment;
- f) All new staff are required to sign that they have read and understood the CA Code of Conduct, Child Protection Code of Conduct, Child Protection Policy, PSEAH Policy and the Employee Protection Whistleblower procedure.
- g) All new staff undergo induction and training on safeguarding including PSEAH; and
- h) Commitment to and compliance with the CA Code of Conduct which outlines expected behaviours and obligations will be part of regular performance appraisals.

10. Communicating the policy

The CA PSEAH Policy will be available on the CA Website and disseminated to all staff and partners.

In addition, the Safeguarding Focal Point will be responsible for ensuring ongoing and regular training for all CA workers on Safeguarding including PSEAH.

This policy will also be communicated to partners as outlined in section 5.

11. Reporting

a) Responsibility to report

All CA workers and partners are obligated to **immediately** report any concerns, suspicions, alleged incidents of sexual exploitation, abuse and harassment or breaches of the Codes of Conduct or this policy through the reporting mechanisms mentioned below.

CA has a responsibility to those who report to ensure their safety and confidentiality which is referenced in our Code of Conduct, Complaints Policy and the Employee Protection Whistleblowing Procedure.

CA reports suspected or alleged incidents of SEAH or policy non-compliance to the Audit and Risk Management Committee and to the National Council, respecting confidentiality and privacy in line with a victim/survivor centred approach.

At all times the safety and wellbeing of the victim/survivor and/or the complainant must be paramount and information treated confidentially. Whistleblowers are also protected and supported throughout the reporting and investigation processes according to the CA Employee Protection Whistleblowing Procedure.

I. How to report

- i. In the Field, reports can be made through a partner organisation or to any CA worker (e.g. during monitoring visits) who will complete the required forms and forward them to the Safeguarding Focal Point.
- ii. Partners are also able to report directly through the relevant CA Project Coordinator or directly to the Safeguarding Focal Point.

- iii. Via email:
 - a. childprotection@caritas.org.au – (note that this is a confidential email address that is only accessible by the Safeguarding Focal Point/Child Protection Officer and the Safeguarding Coordinator)
 - b. complaints@caritas.org.au - (note that this email is a confidential email address only seen by the complaints officer and, once received, a report will be sent to the respective CA staff member responsible for the type of complaint)
- iv. Via Phone:

Within Australia 1800 024 413
Outside Australia +61 2 8306 3400
(request to speak to the Safeguarding Focal Point)
- v. Via mail addressed to:

The Safeguarding Focal Point or Head of International Programs
GPO Box 9830
Sydney NSW 2001

Additional reporting mechanisms will be developed in conjunction with our partners that meet social, cultural, programmatic and local contexts. This forms part of our accompaniment and capacity building initiatives.

II. Reporting Policies and Procedures

Where relevant, the following reporting policies and procedures should be followed:

- i. CA Complaints Policy

Is for all external complaints and outlines the types of complaints or reports that can be made, protections for those who report and how reports will be handled. This policy is made available to all through our website, socialised to partners and incorporated into program feedback mechanisms.
- ii. CA Whistleblowing Procedure

Aligns to the ACBC Whistleblowing policy. It outlines the type of complaints that can be made, protections for the person whistleblowing and refers to how complaints will be handled.
- iii. CA Child Protection Guidelines and Procedures

Outlines how concerns and reports relating to the abuse or exploitation of children will be managed, including reporting requirements to DFAT.
- iv. CA Respectful Relationships Procedure

Outlines the process for concerns and reports concerning staff behaviour and actions to other staff members.

All CA mechanisms refer to the ACBC Investigations Policy.

III. Responsibility for investigations

The Safeguarding Focal Point is responsible for taking prompt and appropriate action in relation to SEAH reports including determining the most appropriate investigation process which may involve external legal, mediation or expert advice as required.

IV. Reporting to authorities

Where safe to do so, and when in accordance to the wishes of the victims, survivors and whistleblowers, all alleged SEAH incidents that involve a criminal aspect should be reported through the correct local law enforcement channels regardless if it is mandated or not.

V. Reporting to DFAT

CA is obligated to report to DFAT and it is the responsibility of the Safeguarding Focal Point to ensure reporting is in accordance with DFAT requirements and reporting form see annex 4:

- i. **Mandatory and immediate** (within two working days of becoming aware of an alleged incident) reporting by all staff and DFAT partners of any alleged incident of sexual exploitation, abuse or harassment related to the delivery of DFAT business. This includes any alleged incident that poses a significant reputational risk to DFAT. For example, an allegation against a senior staff member of a partner organisation.
- ii. **Mandatory reporting** (within five working days) by all staff and DFAT partners of any alleged Policy non-compliance; for example, failure to adhere to the PSEAH Policy Minimum Standards or principles.

12. Related Documents

Internal

This policy sits within the CA Safeguarding Framework which includes the following related documents:

- a) PSEAH:
 - this PSEAH Policy,
 - ACBC Sexual Harassment Procedure
 - ACBC Workplace Bullying and Harassment Policy and Procedure
 - ACBC Prevention of Bullying and Harassment Procedure
- b) Child Safeguarding:
 - CA Child Protection Policy statement,
 - CA Child Protection Guidelines and procedures,
 - CA Child Protection Code of Conduct
- c) Human Resources:

- CA Code of Conduct
- Recruitment policies and procedures
- National Criminal History Check Policy
- Volunteers policies and procedures
- Working with Children Check Procedure
- d) Feedback and Complaints Management
 - ACBC Misconduct Procedure
 - ACBC Grievance Policy
 - ACBC Investigations procedure
 - CA Respectful Workplaces Procedure
 - CA Complaints Policy
 - CA External Complaints
 - CA Employee Protection (Whistleblower Procedure)
- e) Other
 - Caritas Australia Acceptable Use of ICT Policy

External

Australian Department of Foreign Affairs and Trade

- [DFAT Prevention of Sexual Exploitation, Abuse and Harassment Policy](#)
- [DFAT Guidance on assessing the risk of SEAH](#)

Caritas Internationalis

- [Caritas Internationalis Children and Vulnerable Adults Safeguarding policy](#)
- [Caritas Internationalis Anti-harassment policy](#)
- [Caritas Internationalis Complaints Handling Policy and Procedure](#)
- [Caritas Internationalis Code of Ethics and Code of Conducts](#)

Catholic Professional Standards Ltd

- [National Catholic Safeguarding Standards](#)

Version No.	Date Approved	Approved By	Description of Changes
1.0	29 January 2020	National Council	First Release

Annex 1: 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 under the law applicable to the child, majority is attained earlier. For the purposes of this Policy, DFAT and CA considers a child to be a person under the age of 18 years.
Fraternisation	Refers to any relationship occurring in the course of conducting business, 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 includes 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.
Perpetrator	A person (or group of persons) who commits an act of SEAH or other type of crime or offence.
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 ¹ 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	<p>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.</p> <p>Some examples of behaviour that may be sexual harassment include:</p> <ul style="list-style-type: none"> • 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; and • 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 or sexual acts
Victim/survivor	A person who is, or has been, sexually exploited, harassed or abused

¹ Refers to age of consent requirements specified for sexual activity in the law of the host country or the age of consent under Australian law (16 years), whichever sets the greatest age.

Annex 2: DFAT Reporting Requirements²

Reporting helps us to monitor SEAH incident management. When alleged incidents are reported, we will work with the organisation or individual to track incident management. Over time, reporting will allow us to analyse trends and improve prevention and response strategies. In line with our transparency agenda, DFAT will report annually on Policy implementation — not individual cases.

In accordance with Principle 3 — *Victim/survivor needs are prioritised* — victims' and survivors' safety and wellbeing must be paramount to reporting and their information treated confidentially. Whistleblowers must similarly feel safe and protected during the reporting process.

DFAT expects two kinds of incident reporting:

- **Mandatory and immediate** (within two working days of becoming aware of an alleged incident) reporting by all staff and DFAT partners of any alleged incident of sexual exploitation, abuse or harassment related to the delivery of DFAT business. This includes any alleged incident that poses a significant reputational risk to DFAT. For example, an allegation against a senior staff member of a partner organisation.
- **Mandatory reporting** (within five working days) by all staff and DFAT partners of any alleged Policy non-compliance; for example, failure to adhere to the PSEAH Policy Minimum Standards or principles.

Who reports

All DFAT staff and partners must report any alleged incidents of sexual exploitation, abuse or harassment or Policy non-compliance.

What is reported

Reporting is for any suspected or alleged cases of SEAH perpetrated by anyone within scope of the Policy in connection with official duties or business.

If in doubt, staff and DFAT partners should report an alleged incident. In line with Principle 1 *Zero tolerance of inaction* — individuals and organisations found not reporting alleged incidents will be viewed as being non-compliant.

Reports of abuse or exploitation of individuals under the age of 18 years must follow DFAT's Child Protection Policy – see www.dfat.gov.au/childprotection.

How to report

All reports of alleged SEAH incidents should be made using the DFAT Sexual Exploitation, Abuse and Harassment Incident Notification Form (www.dfat.gov.au/pseah) and emailed to seah.reports@dfat.gov.au.

Where safe to do so, and when in accordance to the wishes of the victims, survivors and whistleblowers, **all alleged SEAH incidents that involve a criminal aspect should be reported through the correct local law enforcement channels.**

To protect the privacy of alleged perpetrators, victims/survivors, and whistleblowers, information provided to DFAT will be handled in accordance with the *Privacy Act 1988 (Cth)*.

² DFAT PSEAH Policy, page 9 – 10.

Annex 3: DFAT Minimum Standards

DFAT PSEAH Minimum Standards						
Minimum standard	Obligation		Applies to			
	Organisations	Individuals	Low Risk	Med Risk	High Risk	Very High Risk
1. Have a PSEAH policy or other documented policies and procedures in place and clearly communicate expectations of this Policy.	Must have a PSEAH policy or other documented policies and procedures in place, which clearly meet the expectations of this Policy.	Sign a document outlining appropriate and enforceable standards of conduct, compliant with the requirements of this Policy	✓	✓	✓	✓
2. Have reporting and investigation procedures in place.	The PSEAH policy, or equivalent, documents how SEAH incidents will be managed, reported and investigated. Reporting and investigation processes must include engagement of and reporting to senior management and executive boards.	Through a document which outlines appropriate and enforceable standards of conduct, confirm awareness of DFAT's PSEAH reporting requirements for concerns or incidents and policy non-compliance.	✓	✓	✓	✓
3. Have risk management processes that include the risk of SEAH.	Have effective risk management processes that include consideration of the risk of SEAH. The process must document the controls already in place or to be implemented to reduce or remove risks.	Must meet the reporting requirements under their agreement, aligned to DFAT's PSEAH Policy.	X	✓	✓	✓
4. Effective PSEAH training in place.	PSEAH training for personnel, including downstream partners and individuals that deliver DFAT business.	Complete PSEAH training and provide evidence of this.	X	X	✓	✓
5. Recruitment and screening processes and employment practices address and manage the risk of SEAH.	Can demonstrate robust PSEAH recruitment and screening processes for all personnel/consultants including having in place appropriate and enforceable standards of conduct.	Based on a risk assessment, assurances could include providing a recent police check, working with vulnerable people check or location specific equivalent that provides assurance reasonable SEAH precautions have been taken. Local requirements must also be followed.	X	X	✓	✓
6. Prohibit transactional sex for all personnel, while engaged in the direct delivery of DFAT business	Prohibits transactional sex in the field for all staff and downstream partners while engaged in the delivery of DFAT business	Employment agreements include clauses prohibiting transactional sex while engaged in the delivery of DFAT business.	X	X	X	✓
7. Prohibit fraternisation for all non-national personnel, while engaged in the direct delivery of the DFAT business	Prohibits fraternisation for all non-national personnel in the field while engaged in the delivery of DFAT business	Employment agreements include clauses prohibiting fraternisation for all non-national individuals while engaged in the delivery of DFAT business	X	X	X	✓