
Prevention of Sexual Exploitation, Abuse and Harassment Policy

May 2020

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| Board Ratification Date: | May 2020 21 May 2019 | |
| Reaffirmation Date: | | |
| Revision Date: | Nov 2019 | Minor updates |
| Next Review: | May 2023 | Every three years from date of last ratification or full review or earlier if required |

1. Purpose

This policy confirms Act for Peace’s zero tolerance of sexual exploitation, abuse and harassment, including zero tolerance of a lack of action to establish a safeguarding environment and to respond to safeguarding concerns. Act for Peace will continue to strengthen our commitment to the prevention of sexual exploitation, abuse and harassment by ensuring all members of staff understand their responsibilities in maintaining an environment which prioritises safeguarding, addressing inequity in power, and prioritising the safety and wellbeing of survivor/victims. Act for Peace will continue to strengthen our safeguarding through reflection on both theory and practice and through participation in activities that strengthen the broader safeguarding environment. This policy is maintained through our culture, actions, procedures, agreements, reporting and adherence to relevant laws, policies, principles and standards.

2. Objective

The objectives of this Policy are to:

1. Create and maintain protective environments for all individuals in delivery of Act for Peace activities, including but not limited to activities funded by Act for Peace.
2. Create mandatory organisational standards for Act for Peace to prevent, mitigate and respond to risks of sexual exploitation, abuse and harassment.
3. Create and enforce mandatory behavioural standards for all staff , volunteers, consultants, contractors, Board members, representatives, program partners and those visiting projects in order to prevent, deter and immediately respond to, risks posed by Act for Peace and its representatives.
4. Clarify requirements for partners and other stakeholders.

3. Scope

This Policy addresses safeguarding for the prevention of sexual exploitation, abuse and harassment of adults. Safeguarding for children is covered in our Child Safeguarding Policy. This Policy does not cover protection concerns in the wider community not perpetrated by Act for Peace staff or others or by additional stakeholders as noted below.

Adherence to this Policy is a mandatory requirement for all Act for Peace staff, volunteers, contractors, consultants, Board members, representatives, and those visiting projects (including donors) (hereafter referred to as “staff and others”).

Adherence to this Policy is mandatory for additional stakeholders including:

- Partners
- Sub-contractors and any other entity engaged to perform Act for Peace's work.

Partners are required to demonstrate commitment through appropriate internal policies.

Additional stakeholders, including partners are required to demonstrate adherence to our principles and reporting requirements through commitment to agreement on zero tolerance of sexual exploitation, abuse and harassment in agreements signed with Act for Peace.

Our Prevention of Sexual Misconduct, Abuse and Harassment procedures detail compliance requirements for all stakeholders including standards and integrity screening. Act for Peace takes a risk based proportional approach to the application of standards and other requirements. Act for Peace requires staff, others and other stakeholders to, in the least, meet the Department of Foreign Affairs and Trades Minimum Standards.

This Policy is to be enacted alongside obligations confirmed in additional Act for Peace policies including:

- Code of Conduct
- Child Safeguarding
- Discrimination, Bullying and Harassment
- Recruitment and Selection
- Staff Grievance
- Complaints
- Whistle-blower

Procedures related to the policies above are to reflect mandatory commitments to the prevention of sexual exploitation, abuse and harassment.

4. Policy Statement

As confirmed in our Code of Conduct, we believe sexual exploitation, abuse and harassment (SEAH) is a form of Gender-Based Violence (GBV). Act for Peace recognises that SEAH can occur in any development or humanitarian setting. In humanitarian crises, however, the dependency of affected populations on humanitarian agencies for their basic needs creates an additional ethical responsibility and duty of care on the part of all Act for Peace staff and others.

In addition, Act for Peace understands that SEAH can occur in any employment scenario, including within our own Agency.

This Policy is underpinned by the following principles:

1. **Zero Tolerance of Sexual Misconduct, Violence, Coercion, Exploitation, Neglect, Abuse, Harassment, including Zero Tolerance of Inaction:** Act for Peace believes that all individuals have a right to be safe at all times, and have equal rights to protection from all forms of sexual misconduct, violence, coercion, exploitation, abuse and harassment regardless of their gender, nationality, religious or political beliefs, family background, economic status, legal status ability, age, physical or mental health or criminal background. Any form of sexual misconduct, abuse, harassment or exploitation is unacceptable. Failing to promote the prevention of SEAH, or to address concerns or allegations of SEAH is unacceptable.

2. **Responsibility of All:** Act for Peace believes that the safeguarding of individuals is the responsibility of all. Our Board, Leadership Team and Management commit to driving safeguarding attitudes and behaviours throughout our Agency, leading by example to nurture a strong safeguarding culture, including addressing power inequalities that may lead to SEAH.

All staff and others are obliged to create and maintain an environment which prevents sexual exploitation, abuse and harassment and promotes the implementation of this Policy, our Code of Conduct and other Policies. Managers at all levels have particular responsibilities to support and develop systems which maintain the safeguarding environment.

In addition, we engage with relevant parties to progress social change required to reduce the likelihood of misconduct and abuse.

3. **Addressing Gender Inequity and Other Power Imbalance:** Act for Peace acknowledges that an imbalance of power underlies gender inequity, that sexual abuse is itself a form of gender based violence, and the intersectionality of various forms of discrimination and abuse exacerbate the negative impact of this power imbalance for many, particularly for women and girls. Act for Peace is committed to promoting gender equality and equity and to non-discrimination in regard to gender identity within our Codes of Conduct, our human resource management processes and in the design of programs and initiatives. Act for Peace aligns our approach to sexual misconduct, abuse and harassment and child safeguarding with a wider framework of gender equity whilst acknowledging the need for different responses to each.

In ensuring a safeguarding environment, Act for Peace commits to addressing negative power imbalance, and so to work with staff and others, partners, and communities to challenge attitudes toward all, and in particular girls and women¹ which permit or excuse sexual misconduct organisationally, or in program activities.

In doing so Act for Peace promotes the integration of a gender-sensitive perspective into efforts to effectively prevent and respond to sexual abuse and exploitation.

4. **Survivors/Victims are prioritised:** Act for Peace ensures the survivors/victims of safeguarding breaches are at the heart of our safeguarding prevention and response. Actions to address sexual exploitation, abuse or harassment will take a 'do no harm' approach prioritising the rights, needs and wishes of the survivor/victim whilst providing procedural fairness to all parties. Through this approach survivors/victims:
 - a. Are treated with dignity and respect
 - b. Will not be discriminated against on the basis of their claim, gender, age, race/ethnicity, religious affiliation, sexual orientation, ability or any other basis
 - c. Are assured of privacy and confidentiality other than where information must be shared by law or to support an investigation
 - d. Are involved in decision making

¹ Act for Peace recognises that power imbalances can negatively affect women, men, girls and boys and we remain concerned about inequity and abuse of any kind, however in the main women and girls are more negatively affected by gender inequity than men and boys.

- e. Are provided with sufficient resources including counselling, health and legal services and information

Whistle-blowers are to be treated with dignity and respect. Support will be considered in respect of any trauma that may have been experienced in raising an allegation.

- 5. **Adherence to Law as a Safeguarding Measure:** In countries including Australia and countries we travel to for work, Act for Peace staff and others will adhere to relevant local and international law, and conventions established to protect individuals from all forms of sexual misconduct, abuse, harassment and exploitation.

To protect Act for Peace stakeholders in all situations, Act for Peace staff and others will:

- Create and maintain an environment which prevents sexual exploitation, abuse and harassment and promotes the implementation of our Code of Conduct.
- Ensure our Board, Leadership and Management lead and are accountable for cultural change that supports safeguarding, including through modelling our principals, through coordination of those principals, and through appropriate procedures and resourcing.
- Ensure all staff and others and partners have access to, are familiar with, and know their responsibilities within this policy. Ensure all staff and others sign our Code of Conduct and Child Safeguarding Code of Conduct with understanding prior to commencing employment/engagement, and fulfil their obligations. All staff and others engaging with Act for Peace will be made aware of the Policy and their responsibilities as stated in the Policy during their orientation, in pre-deployment preparation and during annual policy refresher sessions.
- Incorporate a commitment to gender equity and safeguarding within our Board Charter. Determine gender ratios for our governing body, and ensure pathways which support representation of at least 40% of each gender on the Board at any time.
- Dedicate a PSEAH focal point who has the overall responsibility for the development and implementation of PSEAH policy and activities. The responsible focal point is required to regularly report to the Act for Peace Leadership Team.
- Work with staff and others, partners, and communities to challenge attitudes toward all, and in particular girls and women² which permit or excuse sexual misconduct organisationally, or in program activities.
- Design and undertake programs, advocacy, campaigns and other activities in a way that protects people from any risk of harm that may arise from their coming into contact with Act for Peace. This includes the way in which information about individuals in our programs is gathered and communicated, and ensuring that staff, others, partners and communities can access sensitive and contextually appropriate complaints mechanisms.
- Report any suspicions or concerns regarding sexual exploitation, abuse, or harassment or breach of this policy by a fellow staff member, other or external party, using the Act for Peace reporting process described below.
- Recruit the safest and most suitable people to work with us, following robust recruitment screening processes as outlined in our Safeguarding and Child Safe Recruitment Procedures. We will implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel. Ensure staff receive training on safeguarding at a

² Act for Peace recognises that power imbalances can negatively affect women, men, girls and boys and we remain concerned about inequity of any kind, however in the main women and girls are more negatively affected than men and boys.

level commensurate with their role in the organization. Ensure staff members dealing with PSEAH have formalised responsibility for PSEAH in their job description, performance appraisal or similar. They have received systematised training on PSEA and the time committed to PSEA is commensurate with the scale of implementation required. We collaborate within and beyond our sector to improve employment practice, including background checks, to minimise opportunities for perpetrators' to access to our sector and to reduce their ability to move between organisations.

- Acknowledge that sexual exploitation and abuse by any staff member or other constitutes acts of gross misconduct and are therefore grounds for termination of employment.
- Empower staff and others, including those affected by sexual misconduct, abuse or harassment, to develop strategies for reducing and stopping this behavior.
- Collaborate within and beyond our sector to improve employment practice, including background checking, to minimise opportunities for perpetrators' access to our sector and to reduce their ability to move between organisations.
- Have effective risk management processes that include consideration of the risk of SEAH, documenting the controls already in place or to be implemented to reduce or remove risks. This process will include assessing the capacity of partners for implementation of key safeguarding policy requirements (including SEAH). Act for Peace will assess the level of risk for SEAH occurring and meet or exceed the DFAT PSEAH Minimum Standards (see DFAT PSEAH Policy Attachment I)
- Be transparent about our activities; we will monitor progress and will publicly demonstrate our ongoing efforts to improve safeguarding practice.
- Document a work plan to implement this policy.

5. Reporting and Investigation

Act for Peace encourages reporting of concerns or incidents related to sexual exploitation, abuse or harassment. Reporting allows us to respond, enables us to increase understanding of our context and therefore improve our safeguards, and indicates a growing awareness of SEAH. Act for Peace will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with. Act for Peace will ensure the safety and wellbeing of survivors/victims will remain paramount, in line with principle (4). In line with our zero tolerance principle (1) anyone found not reporting will be viewed as non-compliant.

Act for Peace will respond to all safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations.

Act for Peace will offer support to survivors of harm caused by staff or others, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be agreed with the survivor/victim.

Staff and others must immediately report any concerns or behaviour that is suspected of being:

- sexual exploitation, abuse or harassment
- a breach of this Policy or our Code of Conduct.

Victims' and survivors' safety and wellbeing will be paramount to reporting and their information treated confidentially. Whistle-blowers must similarly feel safe and protected during the reporting process. All information about sexual exploitation, abuse and harassment concerns and reports is to be kept confidential, shared only as required by law or to facilitate an investigation.

Concerns and reports are to be provided to the PSEAH Safeguarding Focal Point according to reporting procedures. These procedures are to be available in our operations manuals and on our website for all stakeholders.

Our PSEAH Safeguarding Focal Point will coordinate an investigation team as appropriate. The Chief Executive Officer is to be notified by the PSEAH Safeguarding Focal Point immediately that a report has been received. The Chief Executive Officer will notify the Chair of the Act for Peace Board and the Chair of the Finance, Audit and Risk Management Committee that an allegation has been received. The PSEAH Safeguarding Focal Point is to update the Chief Executive Officer on progress with the investigation.

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

The Act for Peace Safeguarding Focal Point must report to DFAT any behaviour that is suspected of being sexual exploitation, abuse, harassment, or policy non-compliance using the DFAT Sexual Exploitation, Abuse and Harassment Incident Notification Form (www.dfat.gov.au/pseah) and email to seah.reports@dfat.gov.au. Two kinds of incident are to be reported to DFAT as follows:

- **Mandatory and immediate (within two working days of becoming aware of an alleged incident)** reporting 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 DFAT partners of any alleged Policy non-compliance; for example, failure to adhere to the PSEAH Policy Minimum Standards or principles.

Reporting to DFAT is required for any suspected or alleged cases of SEAH perpetrated by anyone within scope³ of the DFAT PSEAH Policy in connection with official duties or business.

Reports of abuse or exploitation of individuals under the age of 18 years must follow the Act for Peace Child Safeguarding Policy.

If an Act for Peace staff member is unsure whether a concern or allegation amounts to sexual exploitation or abuse or harassment or a breach of policy/code of conduct, they must contact the Act for Peace Safeguarding Focal Point for confidential advice and further information by sending an email to complaints@actforpeace.org.au, or by phoning the Sydney office on **02 8259 0800**, or, if calling from outside Australia, on **+61 2 8259 0800**, and speaking to the **Safeguarding Focal Point**. If in doubt, report an alleged incident in line with the principle of zero tolerance of inaction.

Any actions necessary to meet the protection needs or the emotional, mental and physical health needs of individuals involved MUST be taken at the same time that any reporting and/or follow-up investigation is taking place. Our Safeguarding Focal Point will advise how to respond to protection and health needs.

³ DFAT PSEAH Scope covers: 1. DFAT partners who have agreements in place with DFAT (funded and unfunded). 2. Partner governments and multilateral organisations 3. Downstream DFAT partners, that is, contractors, subcontractors, partners and any other entity engaged by DFAT partners to perform any DFAT-related work. Application of the Policy to downstream partners is the responsibility of the partner with whom DFAT has an agreement. DFAT will require evidence of this application as part of their risk management processes.

If an Act for Peace staff member or other is requested not to take any further action by the person making the allegation, for instance out of fear for the security of the person, the Act for Peace staff member or other must advise the requesting person that they are still obliged to notify the Act for Peace Safeguarding Focal Point and will pass on the protection concern. If the allegation is reportable to DFAT under the DFAT policy, the Act for Peace Safeguarding Focal Point must still notify DFAT acknowledging the security concern.

If the incident occurred in Australia and constitutes illegal activity or if a person is in danger, the Act for Peace Safeguarding Focal Point will immediately notify the Police. Contact details will vary based on the location of the incident. The New South Wales police can be contacted on <https://www.police.nsw.gov.au/contact-us> and Victoria police can be contacted on <https://www.police.vic.gov.au/contact-us>. Further guidance is to be sought from the Police on other agencies to contact.

If the incident occurred outside Australia and constitutes criminal behaviour, Act for Peace will contact Australian Federal Police if it concerns an Australian citizen.

Delegation schedule: If the Act for Peace Safeguarding Focal Point is on leave or otherwise uncontactable, the Manager, People and Culture, or, if unavailable, the Chief Operating Officer, will be the acting Act for Peace Safeguarding Focal Point.

6. Definitions and Explanations

Agreements: Any document of engagement or commitment which binds another party to work with Act for Peace. Examples include partnership and grant agreements, memorandum of understanding, contracts, letters of engagement and the like.

Child: A person below the age of 18.

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. Where significant power imbalance is at play the potential for exploitative fraternisation is increased.

Harm: Psychological, physical and any other infringement of an individual's rights

Program partner: For the purposes of this policy, Partner refers to any organisation or person that Act for Peace partners with to deliver program services.

Perpetrator: A person (or group of persons) who commits an act of SEAH or other type of crime or offence.

Psychological harm: Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.

Protection: Protection includes all activities aimed at ensuring respect for the letter and spirit of international human rights, humanitarian and refugee law. For Act for Peace, protection focuses on the preventing, mitigating or responding to violence, coercion, deliberate deprivation and abuse.⁴

Preventing Sexual Exploitation and Abuse (PSEA): The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary

⁴ See Act for Peace Humanitarian Protection Policy.

General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13).

Preventing Sexual Exploitation, Abuse and Harassment (PSEAH): An update of the term PSEA to include sexual harassment against community members as well as other staff.

Safeguarding: protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect⁵. We understand safeguarding to mean protecting people, including children and at risk adults, from harm that arises from contact with our staff or others or programs. Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur. This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes. Safeguarding applies consistently and without exception across our programs, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until proven guilty. Safeguarding puts beneficiaries and affected persons at the centre of all we do.

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 consent⁶ 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, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Sexual exploitation includes using one's position of authority, influence or control to pressure, force or manipulate someone to do something against their will knowingly or unknowingly, by threatening them with negative repercussions such as withholding project assistance, not approving an employee's work support requests, threatening to make false claims about an employee in public etc.⁷

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 others.

Some examples of behaviour that may be sexual harassment include:

- staring or leering;
- unnecessary familiarity, such as unwelcome affection, touching, fondling including brushing up against someone;
- Offensive hand or body gestures;

⁵ NHS 'What is Safeguarding? Easy Read' 2011

⁶ Refers to age of consent requirements specified for sexual activity in the law of the host country or the age of consent under the law of the Australian Capital Territory (16 years), whichever sets the greatest age.

⁷ ACT Alliance Code of Conduct (see link above)

- Sexually suggestive comments or jokes;
- insults or taunts of a sexual nature;
- intrusive questions or statements about a person's private life or the way they look;
- displaying posters magazines or screen savers of a sexual nature;
- sending sexually explicit posts on social media sites, emails or text messages;
- inappropriate advances on social networking sites;
- displaying offensive screen savers, photos, calendars or objects
- 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.

Staff and Others: refers to all Act for Peace staff, volunteers, contractors, Board members, representatives, those representing Act for Peace and those participating in Act for Peace-organised project visits. **Staff:** Staff refers to those employed by Act for Peace or contracted for work full time, part time, or casual persons working in Australia or overseas, and those engaged on short term contracts such as but not limited to: consultants, researchers, photographers etc., working in Australia or overseas.

Survivor: A person who is, or has been, sexually exploited, harassed or abused. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

Transactional sex: The exchange of money, employment, goods or services for sex, including sexual favours.

Victim/survivor: A person who is, or has been, sexually exploited, harassed or abused.

7. Principles and Standards

This policy reflects the principles, standards and reporting requirements of the:

- ACFIC Code of Conduct and Quality Assurance Guidelines
- Australian Department of Foreign Affairs and Trade's PSEA Policy
- ACNC
- ACT Alliance Policies
- IASC Minimum Operating Standards
- Bond 12 Commitments
- CAN DO Consortia

And Australian legislation in relation to harassment.

ANNEX 1

DFAT PSEAH MINIMUM STANDARDS

DFAT takes a risk-based, proportional approach to PSEAH. Staff and partners must assess the level of risk for SEAH occurring, and apply minimum standards accordingly. Guidance on assessing the risk of SEAH (forthcoming) will be provided to determine the level of risk. The PSEAH Minimum Standards are then applied commensurate with the level of risk identified.

| 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. | ✓ | ✓ | ✓ | ✓ |

| DFAT PSEAH Minimum Standards | | | | | | |
|---|--|---|------------|----------|-----------|----------------|
| Minimum standard | Obligation | | Applies to | | | |
| | Organisations | Individuals | Low Risk | Med Risk | High Risk | Very High Risk |
| 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 | ✓ |

| DFAT PSEAH Minimum Standards | | | | | | |
|---|---|--|------------|----------|-----------|----------------|
| Minimum standard | Obligation | | Applies to | | | |
| | Organisations | Individuals | Low Risk | Med Risk | High Risk | Very High Risk |
| 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 | ✓ |