DFAT’s Protection from Sexual Exploitation, Abuse and Harassment and Child Protection Policies

*Interim guidance on the updated approach to risk assessments and relevant standards*

August 2025

# **Introduction**

This *Interim Guidance* is intended to help DFAT staff and partners understand the new approach to risk management and the application of new Essential or Comprehensive Standards as outlined in the updated Child Protection and Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) policies. This *Interim Guidance* covers:

* [Chapter 1:](#_Roles_and_responsibilities) Roles and responsibilities
* [Chapter 2:](#_Understanding_the_risks) Understanding the risks
* [Chapter 3:](#_Implementing_the_CP_1) Implementing Child Protection and PSEAH Standards
* [Chapter 4:](#_Graduated_approach_to) Graduated approach to compliance

**Forthcoming *Child and Adult Safeguards Implementation Handbooks (one for staff and one for partners)***

DFAT is currently drafting *Child and Adult Safeguards Implementation Handbooks* (the Handbooks) whichare designed to support DFAT staff and partners meet their Child Protection and PSEAH safeguarding obligations. The Handbooks will provide clear, practical guidance to help staff and partners understand and apply DFAT’s Child Protection and PSEAH policies across all activities.

Safeguarding is about more than compliance. It is about ensuring that DFAT activities pose minimal risk of harm to children and adults. The Handbooks will offer flexible, proportionate approaches to help DFAT staff and partners to implement their policy obligations in diverse activities and settings.

The Handbooks will cover:

* legal obligations
* understanding the risks and applying Essential or Comprehensive Standards
* practical support for implementing each standard
* guidance for working with downstream partners
* undertaking compliance monitoring and assurance
* what we mean by a victim-survivor centred approach
* use of images and social media
* supplementary guidance.

We welcome your feedback on this *Interim Guidance* and topics for inclusion in the forthcoming *Child and Adult Safeguards Implementation Handbooks*. Feedback can be emailed [safeguardreviews@dfat.gov.au](mailto:safeguardreviews@dfat.gov.au)

# **Chapter 1: Roles and responsibilities**

DFAT’s Child Protection and PSEAH policies apply to all DFAT staff and partners. However, the responsibilities and requirements will differ, including in applying the Child Protection and PSEAH Standards.

**DFAT staff** must**:**

* adhere to the principles of the policies as well as the internal DFAT *Unacceptable Workplace Behaviour Policy*
* comply with DFAT’s mandatory reporting requirements and any mandatory reporting requirements to law enforcement as required by legislation
* incorporate child protection and PSEAH into due diligence processes for partners
* include mandatory Child Protection and PSEAH clauses in all agreements, grants and contracts
* **undertake child protection and SEAH risk assessments** (refer to [**Chapter 2**](#_Chapter_2:_Understanding))
* monitor partner compliance with the policies
* comply with relevant Australian and/or local legislation.

**DFAT partners** including managing contractors, corporate suppliers, universities, non-government organisations, research institutions, grant recipients and downstream partners must:

* adhere to the principles of the policies
* comply with DFAT’s mandatory reporting requirements and any mandatory reporting requirements to law enforcement as required by legislation
* comply with relevant Australian and/or local legislation
* **take a risk-based approach in applying the Child Protection and PSEAH Standards** (refer to [**Chapter 2**](#_Understanding_the_risks))
* put controls in place to manage and monitor the risk of child exploitation, abuse and harm and sexual exploitation, abuse and harassment (SEAH).

**DFAT partners** that are Australian Government and partner governments, multilateral organisations and regional bodies are expected to act in accordance with the principles of the Child Protection and PSEAH policies. They must also adhere to their own legislation, regulations and policies.

While the policies apply to **individuals**, the Child Protection and PSEAH Standards are primarily aimed at organisations. **Individuals** contracted by DFAT or our partners, or those receiving DFAT-funded grants, scholarships or fellowships, and volunteers must instead:

* sign and adhere to a code(s) of conduct that aligns with the Child Protection and PSEAH policies
* comply with DFAT’s mandatory reporting requirements and any mandatory reporting requirements to law enforcement as required by legislation
* comply with relevant Australian and/or local legislation
* **For Child Protection:** if in ‘direct, sustained or significant contact’ with children, provide a recent police check, working with children/vulnerable people check or a locally appropriate alternative
* **For PSEAH:** if the risk of SEAH is assessed as high, provide a recent police check, working with children/vulnerable people check, locally appropriate alternative or where this is not possible, a self-declaration.

# **Chapter 2: Understanding the risks**

This chapter helps DFAT staff and partners understand the child protection and sexual exploitation, abuse and harassment risks associated with their activity. The level of risk will determine whether any standards apply, and if so, whether they are Essential or Comprehensive in nature.

The determination of the level of risk, and therefore the standards that apply, is the responsibility of DFAT staff and partners. DFAT staff and partners must assess activities, as well as those of any downstream partners, to identify the level of risk.

DFAT staff and partners must document these assessments and continue to monitor for any change in the risk settings.

## **Establishing the child protection risk level**

There are two key questions to help DFAT staff and partners establish the child protection risk:

1. Could the activity involve **contact with children?**
2. Where there could be contact,is the interaction **incidental or minimal contact** or does the activity involve **direct, sustained or significant contact**?

This approach defines three levels of contact with children, each with corresponding Child Protection Standards as outlined below:

| **Level of Contact** | **Definition** | **Child Protection Standards Required** |
| --- | --- | --- |
| **No contact with children** | Activities with no anticipated interaction with children | **None** |
| **Incidental or minimal contact with children** | Activities where interaction with children is limited, indirect or incidental | **Essential Standards** |
| **Direct, sustained or significant contact with children** | Activities involving regular or ongoing interaction with children | **Comprehensive Standards** |

**Examples of contact levels for child protection**

The table below provides practical examples of activities that fall under each level of contact.

| **Level of contact** | **Examples of activities** |
| --- | --- |
| **No contact with children** | * Office-based roles, including attending meetings or training * One-off delivery of corporate goods such as equipment or materials * Provision of a service or a trade such as catering, IT, repair of air-conditioning or photocopier * Remote, desk-based policy advice or writing |
| **Incidental or minimal contact with children** | * The focus of the activity is solely engaged with adults but is in a setting where children may be present. This could be in any community or institutional setting, health centre/hospital, school etc. The activity may not have anything directly to do with children but by conducting DFAT business in any of these settings, you will most likely have incidental contact with children which creates some risk. * Attendance at or delivery of goods or services at public diplomacy events where children may be present under the supervision of parents/carers, such as catering or food service |
| **Direct, sustained, or significant contact with children** | * Activities involving children where individuals may be in a position of trust, influence, supervision, or authority over children. * Could include one-off interaction of ongoing interactions * Teachers or volunteers delivering regular lessons * Health care workers providing services to children * Conduct of interviews with children or collection of stories and images of children for the media, public diplomacy, research, evaluations etc * Sports coaches or arts facilitators * Any activity conducted in child spaces or child residential settings |

The level of contact with children is not always obvious at the beginning of an activity. Complete the following checklist for a more detailed assessment of the risks and to determine what steps you need to take to mitigate and manage any child protection risks (refer to the ‘standards’).

**Understanding child protection risks**

If the answers to any of the questions below is **Yes**, then the risk of child exploitation, abuse and harm will be higher because the activity could have contact with children in situations that could increase their exposure to child protection risk and their vulnerability. This means that either the Essential or Comprehensive Child Protection Standards must be implemented for the activity to mitigate the risk (refer to [**Chapter 3**](#_Implementing_the_CP) of this guidance).

| **Risk factor** | **Guiding questions** |
| --- | --- |
| **High risk setting** | Is the activity in a developing country or humanitarian and peacekeeping setting?  Are there high rates of gender-based violence in the country where the activity is occurring? |
| **Inherent risk** | Personnel will be deployed internationally, or in a remote or rural location (outside their usual residence or organisation)? |
| **Degree of isolation** | Involves being alone with or meeting one-on-one with children? |
| **Online contact or access to personal details** | Involves direct one-on-one or group access to children online?  Involves supervising child-to-child online contact?  Involves online access to a child’s or children’s personal and/or confidential information?  Involves educating children and supporting adults on cyber safety?  Involves access to personal or confidential information of children? |
| **Child/children less able to protection themselves or report situations of harm** | Engages with children who are more likely to be in situations of vulnerability which would increase their protection risks?  *For example: children with disabilities, children and families impacted by disasters, children that have been subject to trafficking, and unaccompanied minors* |
| **Degree of physical contact** | Involves demonstrating a skill to children?  Position involves physical contact with or touching of children? (e.g. sports coaching, medical examination, dressing, bathing, toileting) |
| **Degree of monopoly** | Monopoly on provision of goods and/or services to children or their carers   * Medical or health services? * Food distribution? |
| **Degree of supervision** | Engagement with children is not observed or monitored?  Insufficient number of trained staff to supervise engagement with children? |
| **Degree of trust** | Involves developing close, personal, long-term relationships with children?  Involves transporting children/youth?  Involves one-on-one supervision, overnight supervision, out of town activities or spending extended periods of time with children (e.g. camps), provision of disability support services (for example, sign language)?  Contributes to important decisions regarding the future of children? |
| **Child work or labour** | Possibility that activity will lead to the employment of children?  Possibility that activity will lead to the removal of children from school?  Possibility that activity will lead to children being employed in hazardous work? |
| **Parent/caregiver more likely to be in situations of vulnerability** | Engages with parents who are not in a position to meet the needs of and protect their children?  Engages with parents who experience challenges that contribute to their ability to provide care (e.g. poor health, malnutrition)?  Engages with parents who experience isolation and exclusion and do not have access to support systems (e.g. displaced, humanitarian setting? |
| **Organisational risk** | **Is the organisation/funding recipient?**   * A small community-based organisation with limited experience and/or low capacity to deliver the required activity?   **Does the organisation/funding recipient**   * have poor leadership on child protection? * have a historic lack of diversity in the workplace? * lack child protection in organisational policies and procedures? |

⚠️ **Important Note on Higher Risk Contexts**

Even if an **activity** is thought to have no contact or minimal contact with children or people, the **context** in which it is delivered may elevate the safeguarding risk.

Any activity delivered in a developing country or humanitarian and peacekeeping setting is considered higher risk, regardless of the intended level of contact with children or people. This is because personnel may come into unsupervised or informal contact with children or people outside of formal work settings, and because local regulatory or accountability systems may be weak or disrupted, increasing the vulnerability of children.

## **Establishing the SEAH risk level**

SEAH is perpetrated in workplaces and communities in all sectors and countries. The risk of SEAH is not limited to work internationally. Given how widespread SEAH is, and the complex settings in which DFAT operates:

* very few activities would be considered low or very low risk but could for example, include corporate goods and services delivered in a low-risk setting
* most DFAT activities should be rated as at least a low to medium risk of SEAH
  + this means that most DFAT partners will need to apply at a minimum, the Essential Standards whether in Australia or overseas.

⚠️ **Important Note on Higher Risk Contexts**

All DFAT partners delivering programs in high-risk settings, including but not limited to development or humanitarian and peacekeeping settings must meet the **Comprehensive PSEAH Standards**.

The risks of SEAH are not always obvious at the beginning of an activity. There are many other factors that can increase the risk or the vulnerability of people to SEAH beyond the activity taking place in a developing country or humanitarian and peacekeeping setting.

**The table below provides practical examples of activities that fall under each level of risk to help you make your assessment.**

| **Level of Risk** | **Examples of Activities** | **PSEAH Standards** |
| --- | --- | --- |
| **Very Low Risk** | * One-off delivery of corporate goods such as equipment or materials in a low-risk setting * Remote, desk-based policy advice or writing | **None or consider Essential Standards in development or humanitarian and peacekeeping settings** |
| **Low to Medium Risk** | * Attendance at or delivery of goods or services at public diplomacy events such as catering or food service * Provision of a service or a trade such as catering, or IT * Provision of group training, attendance at meetings. | **Essential** |
| **High Risk** | * Implementation of programs in development, humanitarian and peacekeeping activities * Activities where DFAT partners may be in a position of trust, influence, supervision, or authority * Could include repeated interactions * Infrastructure or construction activities, including WASH * Scholarships, study tours, fellowships | **Comprehensive** |

**The table below provides some questions to consider when thinking about your activity and the role of personnel to help you make your assessment.** The list of SEAH risk factors is not exhaustive but is intended to guide DFAT staff and partners to understand the risk of SEAH and assess what measures need to be implemented to mitigate the risk (refer to [**Chapter 3**](#_Implementing_the_CP) of this guidance).

**Understanding SEAH risks**

If the answer to any of the questions below is **Yes**, then the risk of sexual exploitation, abuse and harassment will be higher. Either the Essential or Comprehensive PSEAH Standards must be implemented for the activity to mitigate the risk of SEAH (refer to [**Chapter 3**](#_Implementing_the_CP) of this guidance).

| **Risk factors** | **Guiding questions** |
| --- | --- |
| **High risk setting** | Is the activity in a developing country or humanitarian and peacekeeping setting?  Are there high rates of gender-based violence in the country where the activity is occurring? |
| **High risk activities** | Involves construction or infrastructure in developing country settings? These can have a higher risk of SEAH given construction industry is male dominated and that construction in developing countries often involves the temporary movement of workers from other areas.  Involves humanitarian or disaster response?  Involves the provision of security services in conflict, post conflict or disaster settings? |
| **Inherent risk and degree of isolation** | Personnel will be deployed internationally, or in a remote or rural location (outside their usual residence or organisation)? |
| **Interaction with individuals, especially women who:** | * are young adults * have a disability * are of an ethnic, indigenous, religious or sexual minority * are experiencing poverty * are sex workers * are part of families impacted by disasters * are displaced, refugees, migrants or asylum seekers * are part of female headed households * are victims/survivors of trafficking and/or other forms of sexual and gender- based violence * are accessing residential/shelter services |
| **Online contact or access to personal details** | Involves direct one-on-one or group access to adults online?  Involves supervising online contact?  Involves online access to personal or confidential information?  Involves supporting adults on cyber safety?  Involves access to sensitive/confidential personal information e.g. health care workers, counselling services, medical personnel, humanitarian aid coordinators? |
| **Degree of physical contact** | Involves demonstrating a skill to adults?  Position involves physical contact with or touching adults? |
| **Degree of monopoly/ provision of goods and/or services that may create a power imbalance** | Monopoly on provision of goods and/or services   * services for vulnerable groups of women (eg. escaping trafficking or gender-based violence)? * food distribution? * medical supplies? * emergency supplies following a disaster? * residential/shelter services? * disability services? * justice facilities? * counselling and support services? * health sector programs? |
| **Degree of trust** | Involves developing close, personal, long term relationships with adults? |
| **Staff or personnel who have an actual or perceived level of authority** | For example:   * security workers * police * teachers * aid workers * humanitarian workers * medical personnel * security services |
| **Organisational risk** | **Is the organisation/funding recipient?**   * A small community-based organisation with limited experience and/or low capacity to deliver the required activity?   **Does the organisation/funding recipient?**   * have poor leadership on PSEAH * have a historic lack of diversity in the workplace * fail to consider PSEAH in core organisational policies and procedures * have geographically isolated work spaces, with employees working in small groups and having fewer opportunities to interact with their Head Office. * have primarily young workforces * normalise “sexualised banter” * tolerate/encourage alcohol consumption * have a very hierarchical structure i.e. are there both high-ranking (Executives) and low-ranking employees in the organisational hierarchy; are there gendered power disparities (e.g. most of the low-ranking employees are female) * have poor reporting mechanisms and transparency around SEAH incidents |

# **Chapter 3: Implementing Child Protection and PSEAH Standards**

This chapter assists DFAT staff and partners to understand the requirements they must meet and the key differences between the Essential and Comprehensive Standards after assessing the risk of child exploitation, abuse and harm and SEAH in [**Chapter 2**](#_Understanding_the_risks).

⚠️ **Reminder**

**For Child Protection:**

* Activities where interaction with children is incidental or minimal must meet the **Essential Standards**
* Activities where interaction with children is direct, sustained or significant must meet the **Comprehensive Standards**

**For PSEAH:**

* Activities in development, humanitarian or peacekeeping settings must meet the **Comprehensive Standards**

For activities in other settings:

* Where the risk of SEAH is low to medium activities must meet the **Essential Standards**
* Where the risk of SEAH is high activities must meet the **Comprehensive Standards**

## **Standard 1: Policy, procedures and code of conduct**

**Essential Standard Requirements:**

* The organisation has a Child Protection and/or PSEAH Policy or statement or other documented policies and procedures which meet the expectations of DFAT’s Child Protection and/or PSEAH Policy.
* **For Child Protection:** The organisation has a Code of Conduct that is consistent with the DFAT Child Protection Code of Conduct. All personnel are required to acknowledge they have read and agreed to the organisation’s Code of Conduct.
* **For PSEAH:** The organisation has a Code of Conduct that is consistent with DFAT’s PSEAH Policy, which includes the prohibition of transactional sex in high-risk settings. All personnel are required to acknowledge they have read and agreed to the organisation’s Code of Conduct.

**Note:** Downstream partners are encouraged to develop their own policies, procedures and codes specific to child protection and/or PSEAH, but may adopt the policies of their upstream partner if appropriate.

**Comprehensive Standard Requirements:**

* The organisation has a detailed Child Protection and/or PSEAH Policy and procedures in place which meet the expectations of DFAT’s Child Protection and/or PSEAH Policy and are subject to regular review. The policy should demonstrate the organisation’s commitment to zero tolerance for child exploitation, abuse and harm and/or sexual exploitation, abuse and harassment and establish procedures in line with these standards.
* **For Child Protection:** The organisation has its own Code of Conduct that is consistent with the DFAT Child Protection Code of Conduct. All personnel are required to acknowledge they have read and agreed to the organisation’s Code of Conduct.
* **For PSEAH:** The organisation has its own Code of Conduct that is consistent with DFAT’s PSEAH Policy, which includes the prohibition of transactional sex in high-risk settings. All personnel are required to acknowledge they have read and agreed to the organisation’s Code of Conduct.

Note: Downstream partners are encouraged to develop their own policies, procedures and codes specific to child protection and/or PSEAH, but may adopt the policies of their upstream partner if appropriate.

**Rationale:** A critical element in building and maintaining a safe organisation is to develop and implement well understood child protection and PSEAH commitment statements, policies, procedures and Codes of Conduct. These documents can be both external and internal, and serve to communicate to your personnel, the public and other stakeholders, that your organisation takes child protection and PSEAH seriously. They also act as a deterrent to potential perpetrators.

Although child protection and PSEAH are underpinned by common principles, such as zero tolerance, and victim-survivor centred responses, they address different risks, legal obligations, and approaches and responses to children are different to those of adults.

Child Protection policies focus on risks specific to children, including their developmental vulnerabilities, limited autonomy, and reliance on adults for care and protection. PSEAH policies respond to risks that arise from power imbalances in adult relationships, particularly gendered power dynamics and abuse of authority within professional, programmatic, or service delivery settings.

DFAT partners may choose to either:

* **develop separate Child Protection and PSEAH policies**, which can improve visibility and strengthen organisational understanding of the specific risks, obligations, and mitigation measures required for each area; or
* **adopt a combined safeguarding policy**, which may be more appropriate where the same internal systems (e.g., recruitment, screening, reporting, or investigation procedures) apply to both child protection and PSEAH. If a combined policy is used, it must include **specific reference to both child protection and PSEAH** and provide clear guidance on the unique risks and required practices for each.
* in some cases, elements of PSEAH, such as sexual harassment in the workplace, may also be addressed within human resources or bullying and harassment policies, but DFAT still expects explicit inclusion of PSEAH standards in the organisation’s core safeguarding policies.

**How to meet the Essential Standard**

| **Requirement** | **Guidance** |
| --- | --- |
| **Policy or statement** | Your policy or statement can be brief but at a minimum should include:   * a commitment to zero-tolerance for child exploitation, abuse and harm and/or SEAH * a summary of your duty of care and obligations * a commitment to prevent, report and respond to concerns   It should be communicated to all personnel and partners and be able to be adapted for community engagement. See example statements below.  An example **Statement** that would satisfy the **Child Protection Essential Standard** requirement:  *[Organisation] is committed to the protection of children. [Organisation] has zero tolerance to child exploitation, abuse and harm and zero tolerance for inaction to prevent, report or respond. Children have a right to survival, development, protection and participation as stated in the United Nations Convention on the Rights of the Child. [Organisation] takes its duty of care seriously, including responding to reports and complaints, and aims at all times to provide the safest possible programs and environments for children.*  An example **Statement** that would satisfy the **PSEAH Essential Standard** requirement:  *[Organisation] has zero tolerance for sexual exploitation, abuse and harassment in all aspects of its work and for inaction to prevent, report or respond to SEAH. [Organisation] takes its duty of care seriously, including responding to reports and complaints, and aims at all times to provide the safest possible working environment and programs.* |
| **Code of conduct** | Your code of conduct should:   * make clear acceptable and unacceptable behaviour in relation to children and adults your organisation engages with * establish a shared understanding of professional boundaries and behavioural standards * form the basis for disciplinary action where unsafe or inappropriate behaviour occurs   DFAT partners can adopt DFAT’s Code of Conduct (forthcoming) or embed DFAT’s **minimum expected behaviours** (forthcoming) into their own code/s of conduct or HR documents.  Codes of conduct for child protection and PSEAH may be combined or kept as two separate documents.  Regardless of the approach, DFAT requires:   * acknowledgement by all personnel (signature or equivalent) * regular reinforcement through training and supervision |
| **Downstream partner alignment** | Your organisation must either:   * support downstream partners to develop their own policies and codes – provide templates, mentoring or policy guidance where needed **or** * where capacity is limited, allow them to adopt your policy if appropriate.   Your organisation must include safeguarding clauses which outline expectations in all subcontracts, grants and memoranda of understanding. |

**How to meet the Comprehensive Standard**

DFAT partners operating in high-risk settings (for SEAH), or whose work involves direct, sustained, or significant contact with children, must meet the Comprehensive Standard. This means having a fully developed safeguarding framework that reflects the complexity of the work and the potential risks involved.These DFAT partners must have the following in place:

| **Requirement** | **Guidance** |
| --- | --- |
| **Comprehensive Child Protection / PSEAH or a Safeguarding Policy** | Your safeguarding policy (or policies) must:   * apply to all personnel and downstream partners * address either or both Child Protection and PSEAH, either in separate or combined formats * reflect your organisation’s commitment to zero tolerance and duty of care * be reviewed regularly (at least every three years) * cover DFAT’s all Standards.   Comprehensive Child Protection and PSEAH policies should cover the following:   * **Statement of Commitment to Child Protection and PSEAH** – This should articulate your organisation’s commitment to child protection and PSEAH, signal leadership commitment, and reinforce accountability to staff, partners, and communities. * **Scope** –Define who the policy applies to—e.g., staff, board members, consultants, volunteers, contractors, visitors, suppliers. This ensures everyone involved in your operations is aware of their responsibilities. * **Guiding Principles** – Outline the beliefs and values that inform your safeguarding approach - such as child rights, do no harm, victim-survivor centred responses, and inclusion. * **Broader Context** – Describe why safeguarding matters in your work. Include the risks associated with your setting (e.g. humanitarian, development, infrastructure) and the impacts of child harm, sexual exploitation, abuse and harassment. This helps staff understand the relevance of the policy. * **Definitions** – Ensure a shared understanding of key terms—e.g., child, abuse, SEAH, transactional sex, safeguarding, victim-survivor. Where possible, align with DFAT’s definitions. * **Implementation of the Policy** –This section should at a minimum describe how the five DFAT Standards are applied in your organisation but may also cover additional implementation guidance depending on the work of the DFAT partner. You may include all these sections directly in the policy or refer to separate procedures documents. The key is to ensure each of the DFAT standards is covered somewhere in your documentation.   + Code of Conduct   + Reporting mechanisms and investigation procedures   + Risk management processes   + Training and awareness activities   + Recruitment and screening * **Code of Conduct** –You may include this within the policy or attach it as a separate annex. * **Collection and Use of Children’s Images and Stories** – (this is only relevant to the Child Protection Policy). Include guidance on informed consent, safety, and dignity when collecting or publishing images or stories of children. * **Policy Review** –State when and how the policy will be reviewed—DFAT recommends at least once every three years or when major changes occur. Include who is responsible for reviewing and approving updates.   These are recommended minimum areas that the policy could cover. It is up to the DFAT partner to determine its own coverage which may include additional areas depending on the type of organisation and nature of business, for example: working with downstream partners, additional requirements for humanitarian or emergency contexts, conditions specific to the area of business such as construction or data management etc. |
| **Documented procedures** | In addition to policies, your organisation must have documented procedures that describe how child protection and PSEAH commitments are put into practice day-to-day and who in your organisation is responsible for what. Depending on your structure, these may sit in a single procedures manual or be integrated across your operations (e.g. HR, program delivery, governance). |
| **Code of conduct** | In addition to the requirements outlined in the table above for the Essential Standard, to meet the Comprehensive Standard, your Code of Conduct must be developed by your own organisation. |
| **Downstream partner alignment** | Your organisation must either:   * support downstream partners to develop their own policies and codes – provide templates, mentoring or policy guidance where needed **or** * where capacity is limited, allow them to adopt your policy if appropriate.   Your organisation must include safeguarding clauses which outline expectations in all subcontracts, grants and memoranda of understanding. |

## **Standard 2: Reporting mechanism and investigation procedures**

**Essential Standard Requirements:**

* The organisation can receive and manage incident reports safely and confidentially in accordance with Australian and/or local law.
* Reporting mechanisms are accessible to all stakeholders including children.
* The organisation must report incidents and investigation outcomes to DFAT.

**Comprehensive Standard Requirements:**

* The organisation has a well-publicised, accessible (including to children), confidential and safe mechanisms for reporting child protection and/or SEAH concerns or incidents which includes protections from retaliation.
* The organisation has documented procedures for managing child protection and/or SEAH incidents that include trauma-informed responses, procedural fairness, transparent and timely investigation processes, privacy protections and support for victim-survivors (including children if the victim-survivor is a child), and appropriate disciplinary actions if the incident involves their personnel.
* The organisation ensures children, families and communities are informed about expected behaviours, reporting mechanisms and investigation processes in accessible and culturally appropriate ways. Reporting mechanisms are accessible to all stakeholders including children.
* The organisation must report incidents and investigation outcomes to DFAT.

**Rationale:**

Strong reporting and investigation procedures are essential to safeguarding and accountability. DFAT requires all partners to establish systems that enable safe, confidential, and accessible reporting of both child protection and SEAH concerns, and to investigate allegations appropriately

Approaches to child protection and PSEAH share foundational principles, such as zero tolerance and a victim-survivor centred approach. While they can share common risk factors including gender inequality, they also differ in terms of some risks, affected groups, and legal obligations. Child protection risks often relate to children’s age-specific vulnerabilities, dependency on adults, and need for protective supervision. SEAH risks typically arise from an abuse of power, and systemic or interpersonal coercion involving adults.

These differences have practical implications for how reporting and response systems are designed and implemented:

* **Accessibility**: Mechanisms must be designed to be accessible and culturally appropriate to both children and adults. This often requires different formats, messaging, and intermediaries. For example, children may need visual tools, trusted adults to help report, or child-friendly explanations, while adults may need anonymous channels, assurances of confidentiality and different safety mechanisms. Where possible, consult with communities, including children/young people, on accessible reporting pathways.
* **Legal Obligations**: Child protection often involves mandatory reporting to government child protection agencies, depending on national or local laws. Failure to report may constitute a legal offence. SEAH, on the other hand, may involve different legal thresholds for reporting to law enforcement or authorities, especially in contexts where SEAH is not well-defined in law or is underreported due to stigma or weak protections. This makes a clear understanding of local legislation and DFAT’s mandatory reporting requirements essential.
* **Investigations**: Internal investigation protocols may differ depending on whether the allegation involves a child or an adult, and whether criminal conduct is suspected. Investigations into child protection incidents may need to pause or adapt to avoid interfering with statutory child protection processes, while SEAH investigations may need to include protections against retaliation and gender-sensitive interviewing techniques as well as pause or adapt to avoid interfering with a criminal investigation.

For all these reasons, DFAT partners must ensure that both child protection and PSEAH are addressed explicitly within their safeguarding procedures. This can be done through integrated or separate systems, as long as both are robust, accessible, and aligned with DFAT’s expectations, victim-survivor rights, and applicable law.

**How to meet the Essential Standard**

| **Requirement** | **Guidance** |
| --- | --- |
| **Safe management of incident reports** | Your organisation must ensure reporting processes are:   * **victim-survivor centered** * based on a **‘do no harm’** approach * aligned with trauma-informed practice * age-appropriate and context-sensitive (e.g. child-friendly for child protection, culturally safe for PSEAH).   Refer to [Principles for Reporting and Investigation Mechanisms table](#Reporting) below for further guidance. |
| **Confidential management of incident reports** | To ensure confidentiality:   * limit data sharing **only to what is necessary** * **de-identify** reports or shared data * obtain the **informed consent** of the victim-survivor prior to sharing any identifying information   + *Note: In child protection cases, mandatory reporting laws may require disclosure even without consent. Partners must follow applicable legal obligations and prioritise the best interests of the child.*   Measures may include:   * Dedicated email address with **controlled access** * Secure protocols for physical mail * Secure data storage systems with **access controls** |

**How to meet the Comprehensive Standard**

| **Requirement** | **Guidance** |
| --- | --- |
| **Principles for reporting and investigation mechanisms** | Reporting and investigation mechanisms should be guided by the following principles:   * Well-publicised * Accessible * Confidential * Safe * Protection from retaliation * Trauma-informed * Procedural fairness * Transparency * Timely and responsive * Privacy protections * Support for victim-survivors * Appropriate disciplinary actions   Refer to the [Principles for Reporting and Investigation Mechanisms table](#Reporting) below for detailed considerations for each of these principles. |
| **Awareness of reporting and investigation procedures** | Your organisation must ensure children/people, communities and all personnel are consulted on and kept informed about expected behaviours, reporting mechanisms and investigation processes.  Information about expected behaviours, reporting mechanisms and investigations processes can be shared in the following ways:   * Communicate expected behaviours by sharing your Code of Conduct and expectations for professional conduct or behaviour including “do’s and don’ts” * Use plain language * Translate into local languages * Display in public places such as program sites, offices, schools, health centres, etc. * Communicate information visually (posters, illustrated guides, infographics) * Explain verbally, including through community meetings, school visits, and one-on-one conversations * Include in all training and inductions * Staff and partners should receive training during induction on DFAT and organisational safeguarding standards   + Volunteers, contractors, and short-term workers should also receive a short safeguarding briefing before engaging. |

**Principles for Reporting and Investigation Mechanisms**

Your organisation’s reporting and investigation mechanisms should be guided by the following principles:

| **Principles** | **Guidance** |
| --- | --- |
| **Well-publicised** | * Reporting options should be clearly communicated to:   + Personnel   + Community members (including children)   + Downstream partners * Ensure stakeholders know **how and to whom** to report |
| **Accessible** | * Provide multiple reporting methods:   + Hotlines, SMS, suggestion boxes   + Trained safeguarding focal points   + In-person, phone, online, email, post * Ensure accessibility:   + In **local languages**   + For people of **different ages, abilities, identities, and contexts** (e.g., children, people with disability, Indigenous, LGBT+)   + Mechanisms must be **physically accessible, culturally safe, and age-appropriate** |
| **Confidential** | * Limit data access and disclosure * Use:   + Controlled-access email   + Secure handling of physical mail   + Secure, access-controlled data storage * Obtain informed consent for sharing identifiable information * Protect the identity of **victim-survivors** and **alleged perpetrators** * Investigations must follow strict confidentiality protocols |
| **Safe** | * Centre the process on **victim-survivor needs and safety** * Ensure all elements (confidentiality, retaliation protection, trauma-informed response) are in place |
| **Protection from retaliation** | * Implement a **whistleblower policy** * Ensure people feel **safe to report** * DFAT partners must **not tolerate retaliation** against:   + Victim-survivors or complainants   + Cooperators in investigations |
| **Trauma-informed** | * Recognise and respond to trauma:   + Minimise re-traumatisation   + Recognise signs of trauma or distress   + Support staff with managing **vicarious trauma** * Provide **appropriate support** for victim-survivors |
| **Procedural fairness** | * Ensure **objectivity and impartiality**   + All parties treated equally   + No conflict of interest   + Facts-based approach * Ensure **independence and non-interference**   + Independent (preferably external to the organisation) investigators   + No management or board interference |
| **Transparency** | * Share investigation information with relevant parties, while:   + Respecting confidentiality and data protection * Investigators must:   + Inform the subject they are under investigation   + Update victim-survivor and/or complainant on progress   + Document methodology, evidence, and conclusions |
| **Timely and responsive** | * Investigations should occur within a **reasonable timeframe** * Acknowledge all complaints with:   + Receipt confirmation   + Expected investigation timeframe * Follow up with the victim-survivor on outcomes |
| **Privacy protections** | * Ensure privacy through:   + Confidentiality measures (see above)   + Secure data management   + Informed consent procedures |
| **Support for victim-survivors** | * Offer support regardless of participation in an investigation:   + **Medical care**   + **Psychological support**   + **Legal assistance**   + **Socio-economic support**   + **Referrals** to reputable service providers |
| **Appropriate disciplinary actions** | * If an incident is substantiated take proportionate disciplinary action, such as:   + Dismissal   + Suspension (with or without pay)   + Demotion   + Mandatory training   + Loss of benefits   + Ineligibility for promotion * If the offence is criminal, consider a **report to local authorities** or Australian authorities, depending on jurisdiction, and if it is safe for the victim-survivor (and in some cases an alleged perpetrator) to do so. * Disciplinary action demonstrates:   + Justice for the victim-survivor   + Organisational commitment to zero tolerance   + Risk management and prevention of re-offending |

**Reporting incident and investigation outcomes to DFAT**

DFAT partners must report all incident and investigation outcomes to DFAT’s Human and Environmental safeguards team. The following outlines their DFAT Reporting and Notification Obligations:

**Mandatory immediate** reporting (within 24 hours) requirements apply to all DFAT partners. Mandatory reporting includes any suspected, alleged or known incidents of child exploitation, abuse, or harm and sexual exploitation, abuse or harassment. Failure to report in accordance with the policies may result in disciplinary, contractual or legal consequences.

**How to Report**

Suspected, alleged or known incidents of **child exploitation, abuse, or harm** must be submitted via [childprotection@dfat.gov.au](mailto:childprotection@dfat.gov.au) preferably using the DFAT Incident Notification Form.

Suspected, alleged or known incidents of **sexual exploitation, abuse or harassment** of adults must be submitted via [seah.reports@dfat.gov.au](mailto:seah.reports@dfat.gov.au) preferably using the DFAT Incident Notification.

Anyone can report an incident or concern to DFAT. Anonymous reports are permitted. The higher level of detail provided the greater likelihood that DFAT can take action.

Where there are fears for the safety of a victim-survivor, or where a victim-survivor has not consented to a report being made please contact [childprotection@dfat.gov.au](mailto:childprotection@dfat.gov.au) (for children) or seah.reports@dfat.gov.au for advice.

Victim-survivors and their families may report directly to DFAT at any time if they choose. Reporting is not mandatory for victim-survivors. However, we encourage reporting to enable support and care to be provided.

Additional obligations under Australian and overseas law may apply to report incidents of child harm to law enforcement. Australians should be aware of their obligations to report under appropriate Commonwealth, State and Territory legislation, including its extraterritorial application. Seek independent legal advice.

**DFAT staff obligations to report serious extraterritorial offences**

DFAT staff, in Australia and overseas, must report any information relating to the commission or attempted commission of a serious extraterritorial offence under Australian law to the Transnational Crime Section ([transnationalcrime@dfat.gov.au](mailto:transnationalcrime@dfat.gov.au)). For further guidance, see the Administrative Circular, *Australian extraterritorial offences and the responsibility to report*.

Reports in relation to DFAT staff/family members as perpetrators must be reported to [conduct@dfat.gov.au](mailto:conduct@dfat.gov.au).

**Ensure procedural fairness for Subjects of Investigation**

DFAT partners must implement investigation processes that uphold procedural fairness. This includes ensuring that the alleged perpetrators who are the subject of an investigation are treated with professionalism, impartiality and confidentiality. Investigation procedures should include:

* decisions based on factual evidence
* written notification to the individual under investigation, including the general nature of the allegations
* an opportunity for the individual to respond to allegations and present relevant information or supporting evidence
* confidential handling of all information related to the investigation, noting that anonymity may not be possible if the allegation is substantiated
* access to interview transcripts for review and correction
* the option for the alleged perpetrator to have a support person or interpreter present during interviews.

These safeguards are essential to ensuring fair and credible investigations that respect the rights of all parties and support transparent, just outcomes. DFAT partners are responsible for incorporating these principles into their documented investigation procedures.

## **Standard 3: Risk management processes**

**Essential Standard Requirements:**

* The organisation undertakes a child protection and/or SEAH risk assessment including mitigation actions tailored to the activities and the context, this is reviewed at least annually and revised as needed.

**Comprehensive Standard Requirements:**

* The organisation undertakes a child protection and/or SEAH risk assessment including mitigation actions tailored to the activities and the context, that is reviewed at least annually and revised as needed.
* The organisation must provide documented evidence that senior management and executive boards have visibility of child protection and SEAH risk management.
* The organisation has documented evidence of its expectations for downstream partners and how those partners will manage child protection and SEAH risk.

**Rationale:**

Effective risk management is a cornerstone of safeguarding and must address both child protection and PSEAH. Child protection and PSEAH share foundational principles, such as zero tolerance, victim-survivor-centred responses, and the need for prevention, detection and response, and some common risk factors such as gender inequality. However, they also have specific risks, drivers, and mitigation strategies.

Child protection risks often relate to direct or indirect contact with children, lack of supervision, and environments where children are particularly vulnerable due to age, power imbalances, or dependency. SEAH risks, by contrast, frequently stem from systemic power imbalances, inadequate complaint mechanisms and contextual or cultural norms that can enable abuse and discourage reporting.

Risk must also be considered through an **inclusion lens**. An intersectional approach must be applied to safeguarding, recognising that factors such as context, gender, race, ethnicity, disability, sexual orientation, socio-economic status and systemic marginalisation can increase vulnerabilities and shape safeguarding needs.

Because of these differences, DFAT requires its partners to conduct risk assessments that explicitly consider both child protection and SEAH. This includes assessing who may be at risk, where those risks are most likely to arise, and how to effectively mitigate them.

Risk assessments may be integrated or separate, as long as both child protection and PSEAH are clearly and adequately addressed. The approach should be proportionate to the context and activity.

**How to meet the Essential Standard**

| **Requirement** | **Guidance** |
| --- | --- |
| **Risk assessment** | The risk assessment:   * can be a simple process * should be completed before the deployment of personnel and/or before the activity commences * identifies key risks and mitigation actions * depending on the duration of the activity, this may be a one-off risk assessment or may be reviewed and updated as needed (at least annually) * should be documented.   Refer to the guidance below for an overview of how to undertake a risk assessment. |

**How to meet the Comprehensive Standard**

| **Requirement** | **Guidance** |
| --- | --- |
| **Risk assessment** | The risk assessment should:   * be more detailed and clearly outline factors that heighten risks for children and/or adults in either the activity, the context, the communities most affected etc. * be completed before the activity commences as part of the design or planning process * identify key risks, the likelihood and consequence or impact of each risk, risk ratings, the mitigation actions, responsible persons and timeframes for implementation of mitigations * be regularly reviewed and updated (at least annually) and implementation of mitigation actions monitored * be documented.   Refer to the [guidance below](#Risk) for an overview of how to undertake a risk assessment. |
| **Reporting to senior management and executive boards** | DFAT partners can ensure senior management and executive boards are well informed of child protection and PSEAH risks through the following:   * Board Meetings: include safeguarding and risk management as a standing agenda item on all senior management and executive boards and provide briefing papers. * Risk Registers: Provide copies of organisational or project-level risk registers showing identified safeguarding risks, mitigation measures, and evidence that these have been reviewed or endorsed by senior management. * Safeguarding Reporting in Annual Reports: Include sections in annual or organisational reports demonstrating executive oversight of safeguarding initiatives, incidents, or risk trends. * Safeguarding Performance Dashboards or Reports: Share internal safeguarding performance reports or dashboards that are regularly submitted to and reviewed by senior leadership. |
| **Assist downstream partner compliance** | * Encourage and support downstream partners to develop their own risk assessment processes * Where capacity is limited, they may adopt your processes and templates * Include risk management expectations in all MOUs, subcontracts, and grants * Provide templates, mentoring, or support where needed |

**How to undertake a risk assessment?**

**Step 1. Assess the activities and context:** consider the following:

* The nature of the activity (e.g. health services, education, infrastructure, provision of a service or goods)
* The locations of implementation (e.g. remote, insecure, disaster-affected areas)
* Target populations (e.g. children, women, people with disabilities, refugees, LGBTIQ+ people or others at heightened risk)
* The level of access and contact with communities, particularly with children and vulnerable adults

**Step 2. Identify safeguarding risks**: consider the following:

* Does the activity involve direct or indirect contact with children?
* Are personnel working in unsupervised settings or with limited oversight?
* Are there power imbalances, such as provision of aid, shelter, education, or money?
* Are there cultural, legal, or social norms that may increase risks of SEAH?
* Are there known safeguarding gaps in local institutions or partners?
* Is there a GEDSI analysis to identify potential areas of harm?

Examples of risks include:

* Inappropriate relationships or behaviour by staff or partners
* Child labour or exploitation in program supply chains
* Abuse of children or adults occurring in facilities, outreach activities, or during transport
* Lack of complaint mechanisms accessible to children or other groups

For further information on assessing risks, please refer to [**Chapter 2**](#_Understanding_the_risks).

**Step 3. Assess the likelihood and impact**

For each risk, assess:

* Likelihood: How probable is it that the risk could occur? (e.g. Rare, Possible, Likely)
* Impact: What would be the consequence if the harm occurred? (e.g. Minor, Moderate, Severe)

Plot this using a risk matrix to rate and prioritise the most significant risks.

**Step 4. Develop mitigation strategies**

For each identified risk, determine practical measures or mitigations to reduce the likelihood or impact. Here are some examples:

| **Risk identified** | **Example mitigation action** |
| --- | --- |
| Staff working alone with children | Ensure supervision, use buddy systems, enforce two-adult rule, avoid one-on-one situations |
| Unverified local partners with access to communities | Conduct due diligence, include safeguarding clauses in MOUs |
| No complaint mechanisms for children or women or low awareness of mechanisms | Establish child-friendly and confidential reporting channels, conduct awareness raisings, advertise mechanisms with visible posters |
| Aid distributed in exchange for favours or access | Train staff on power dynamics and SEAH policy; monitor distributions, ensure supervision, use buddy systems, enforce two-adult rule and consider women for food distribution roles, avoid one-on-one situations |
| Staff recruited without screening | Require police checks, reference checks, and safeguarding declarations |
| Weak legal protections in local context | Apply DFAT child protection/PSEAH standards regardless of local law |
| Partner lacks safeguarding policy | Require partner to adopt child protection and PSEAH policy as condition of funding |
| No screening of contractors | Require criminal record checks and referee checks before engagement |
| Children involved in research | Use child-friendly consent forms; have a guardian present during interviews |
| Activity held in remote areas | Establish mobile reporting mechanism; conduct spot-checks by supervisors |

Mitigation actions should be specific, realistic, and integrated into program design, budgeting and training.

**Step 5. Assign responsibilities**

Clearly document:

* who is responsible for implementing each mitigation action
* timeframes for implementation
* monitoring and reporting arrangements

For example:

* HR team ensures all staff complete PSEAH training
* field team leader monitors adherence to child-safe practices
* program manager reviews safeguarding risks quarterly

**Step 6. Monitor and review**

Safeguarding risks can change over time. Risk assessments should be:

* Reviewed at least annually, or more frequently if activities or contexts shift
* Updated when new risks emerge (e.g. during emergencies or scale-ups)
* Used to inform program evaluations, incident reports, and lessons learned

## **Standard 4: Training**

**Essential Standard Requirements:**

* **For Child Protection:** The organisation provides basic child protection training to all relevant personnel. Personnel are required to complete the training annually.
* **For PSEAH:** The organisation provides basic PSEAH training to all relevant personnel advising personnel of rights, obligations and responsibilities. Personnel are required to complete the training annually.

**Comprehensive Standard Requirements:**

* As above but to a comprehensive level in keeping with the expected high level of risk. See below for more details.

**Rationale:** Child protection and PSEAH training are important to ensure all personnel, suppliers, contractors, and volunteers have a general or basic understanding of child protection and PSEAH risks, their responsibilities and DFAT's expectations.

Child protection and PSEAH share common principles, such as zero tolerance, victim-survivor centred responses, and a focus on prevention and accountability. There are some common risk factors but there are also specific risks and mitigation strategies for each are distinct. For example, the vulnerabilities of children differ from those of adults affected by SEAH, and the organisational responses, legal frameworks, and reporting pathways may also vary.

Training should also promote awareness of how intersectional risks, including disability, gender, age, and dependency, may heighten vulnerability to abuse or exploitation. This is essential to ensuring all individuals, particularly those who may face additional barriers to safety or reporting, are adequately protected.

Training can be delivered as separate modules or combined into a single safeguarding session, provided that the content explicitly and adequately covers both areas. Regardless of format, the training must meet the relevant Standard’s expectations and equip personnel to understand and respond to each type of harm appropriately.

**How to meet the Essential Standard**

| **Requirement** | **Guidance** |
| --- | --- |
| **Basic training** | Basic training could be approximately 1-2 hours in duration.   * Training could be delivered online, self-paced e-learning, in person or a facilitated group session. * Records of attendance must be maintained. * The training should be undertaken on induction and repeated annually.   The content of the training should include:   * What is child exploitation, abuse and harm and sexual exploitation, abuse, and harassment (SEAH)? * Definitions including zero tolerance approach and victim-survivor centred principles * What are the risks and impacts of both child protection and SEAH – using specific examples relevant to the DFAT partner’s work and contexts * Overview of DFAT’s Child Protection and PSEAH policies * Personnel responsibilities and obligations for both child protection and PSEAH including the importance of safe workplaces for an organisation’s own personnel. * Code of Conduct – behavioural expectations and prohibited conduct relating to both children and adults * Reporting obligations, including mandatory reporting requirements for both child protection and SEAH incidents * What to do if you see or suspect child exploitation, abuse or harm or sexual abuse, exploitation or harassment of adults. * Consequences of a policy breach * Disciplinary and legal implications. |

**How to meet the Comprehensive Standard**

| **Requirement** | **Guidance** |
| --- | --- |
| **Comprehensive training** | Comprehensive training could be a minimum of 4-8 hours.   * Training could be delivered online, self-paced e-learning, in person or a facilitated group session. * Records of attendance must be maintained. * The training should be undertaken on induction and repeated annually.   The content of the training should include all the basic training content listed above under Essential Standard, as well as:   * Risk assessment and management of both child protection and SEAH risks * Safe recruitment and screening procedures (e.g. criminal record checks, reference checks, declarations) * Safe interviewing techniques including how to engage appropriately with children and with adults disclosing SEAH * Reporting mechanisms – designing accessible reporting channels for children and adults * Confidentiality and victim-survivor centred responses, recognising the different needs of children and adult victim-survivors * How to respond appropriately to allegations or disclosures of both child harm and SEAH, including handling distress, safety planning, and referrals * Incident reporting protocols and escalation pathways, including distinctions between child protection and SEAH legal/reporting obligations * Organisational responsibilities including leadership accountability, cross-department coordination, and partner engagement * Case studies that cover both child protection and PSEAH scenarios relevant to the organisation’s work * Role plays that practice responding to a range of safeguarding situations, such as inappropriate conduct, disclosure handling and referral decisions. |

## **Standard 5: Recruitment and screening processes**

**Essential Standard Requirements:**

* The organisation conducts recruitment and integrity screening for all personnel (including child safe if applicable). Screening should include reference checks, recent police checks, Working with Children or Vulnerable People checks, or locally appropriate alternatives or, where these are not feasible, a self-declaration.

**Comprehensive Standard Requirements:**

* The organisation conducts recruitment and integrity screening for all personnel (including child safe if applicable). Screening should include reference checks, recent police checks, Working with Children or Vulnerable People checks, or locally appropriate alternatives or, where these are not feasible, a self-declaration.
* Additional integrity measures required include targeted messaging and questioning about child and adult safeguarding at all stages of recruitment and onboarding and ongoing monitoring of staff behaviour and adherence to child protection and PSEAH policies and procedures.

**Rationale:** Recruitment and integrity screening processes are a key component in ensuring that organisations do not employ or engage a person who has previously exploited or abused a child or who is otherwise not safe or suitable to work with or be in contact with children. They also play a critical role in preventing the recruitment of individuals who pose a risk of SEAH, including those who may misuse positions of power, authority, or trust in adult or community settings.

**How to meet the Essential Standard**

|  |  |
| --- | --- |
| **Requirement** | **Guidance** |
| **Integrity screening** | Recruitment and integrity screening of personnel should include:   * reference checks * criminal record (police) checks * working with children or vulnerable people checks * or where these are not feasible, a self-declaration.   Refer to [guidance below](#Screening) for detailed considerations for each of these forms of screening. |

**How to meet the Comprehensive Standard**

| **Requirement** | **Guidance** |
| --- | --- |
| **Integrity screening** | Recruitment and integrity screening of personnel should include:   * reference checks * criminal record (police) checks * working with children or vulnerable people checks * or where these are not feasible, a self-declaration.   Refer to [guidance below](#Screening) for detailed considerations for each of these forms of screening. |
| **Job role analysis** | Before recruitment, analyse the position to assess its level of contact with children:   * Determine whether the candidate will:   + Work **directly** with children   + Have **indirect contact** (e.g. via phone, email, social media) * Assess the **frequency and nature of contact** with children * Consider whether the role involves working with:   + **Vulnerable children**   + Children with **particular needs** * Apply **stricter screening measures** for roles involving more frequent or intensive contact with children. |
| **Advertising positions** | When advertising the position, DFAT partners must:   * Clearly state whether the role **involves working with children** * Describe the **child-safe screening practices** that will apply * Include **child-safe messaging** in the job ad, such as:   + “[Organisation] is a child-safe organisation”   + “The safety and wellbeing of children is a priority of our organisation” |
| **Interview process** | Include child protection-focused questions during interviews to assess the candidate’s suitability. Examples include:   * What is your understanding of child protection? * Have you worked or volunteered with children in a similar position? What did you enjoy? What was difficult? * What strengths in working with children do you bring from your community, family, or cultural background? * Please provide three examples of how to work safely with children. * What do you think makes a good community leader or role model for children and young people? * How would you involve children in their own protection as part of our programs?   Tailor interview questions to match the **organisational context** and **specific job description and maintain an accurate record of the interview process**. |
| **Employment contract and safeguarding commitments** | DFAT partners must ensure:   * Employment/engagement contracts include **disciplinary provisions** for child protection breaches, such as:   + Dismissal   + Suspension (with or without pay)   + Transfer to other duties |

**Detailed guidance on recruitment and screening processes**

**Reference checks:**

* All personnel should undergo at least **two referee checks**. Referees may include former employers, volunteer supervisors and community leaders.
* **Verbal** reference checks are preferred as they may elicit more candid information than written references. This must be documented, dated and detail who conducted the check.
* Whether verbal or written, use targeted questions such as:
  + Have you observed the candidate working with children or vulnerable people?
  + Do you have any concerns about the candidate’s behaviour with children or vulnerable people?
  + Would you be comfortable placing a child in the care of this person?

**Criminal record (police) checks:**

* All personnel must provide **recent police checks** covering all countries of citizenship and each country where they have lived for **12 months or more** in the past five years.
* For **Australian residents or those working in Australia**, obtain a **National Police Check** through the Australian Federal Police.
  + Use **Code 35** for overseas employment
  + Use **Code 37** where the role involves care or supervision of children or vulnerable persons (includes spent convictions)
* Police checks must be **verified** using original or certified documents and **less than 12 months old** to be considered valid.

**Working with children or vulnerable people checks:**

* These are **State- and Territory-based** in Australia, with different laws and processes:
  + **ACT and Tasmania**: Working With Vulnerable People Check
  + **Queensland**: Blue Card
  + Other states: Working With Children Check (WWCC)
* These checks are designed to **exclude individuals who pose a risk** to children or vulnerable people.
* Where local equivalents are not available, acceptable alternatives may include documentation from a **government or legal authority** and **endorsement from a community or religious leader**.

**Self declarations (only to be used where other checks are not practicable or feasible):**

* If formal police or WWCC-equivalent checks **cannot be obtained**, then obtain a **signed self-declaration** from the candidate.
* The declaration must disclose any charges, convictions or disciplinary actions related to:
  + Child exploitation, abuse, or harm
  + Sexual Exploitation, Abuse and Harassment (SEAH)
  + Other serious misconduct

# **Chapter 4: Graduated approach to compliance**

**Locally led development**

Australia’s [International Development Policy](https://www.dfat.gov.au/development/international-development-policy) includes a commitment to locally led development and supporting local leadership across different aspects of society (government, business, academia, civil society). Approaches to locally led development need to be implemented in a way that continues to meet obligations to safeguard against child exploitation, abuse and harm and sexual exploitation, abuse and harassment of adults.

DFAT is committed to working with a diverse range of partners. This includes suppliers less familiar with policy obligations and small, local, or community-based organisations, many of whom bring deep contextual knowledge, trusted relationships, and strong delivery capacity.

Shifting more ownership, decision making authority and implementation responsibilities to local partners may expose DFAT to different implementation risks than experienced with other partners. It is important to allocate resources to effectively manage these risks, including where necessary working with local partners to strengthen their capability to implement and meet policy requirements.

For further guidance on locally led development, please refer to the [DFAT Guidance Note: Locally Led Development](https://www.dfat.gov.au/publications/development/dfat-guidance-note-locally-led-development), in particular Annex D: Managing Risks and Safeguards.

**A graduated approach to compliance**

DFAT recognises that such organisations may need time and support to achieve full implementation of the Comprehensive Standards if required. In these cases, a graduated and supportive approach is encouraged.

This approach means DFAT agrees that partners will:

* fully implement the Essential Standards to address immediate safeguarding risks
* document an action plan outlining specific steps and clear timeframes to achieve compliance with Comprehensive Standards
* seek technical support and mentoring as needed
* implement and monitor progress against the action plan to ensure full implementation of the Comprehensive Standards within a ‘reasonable’ time frame.

The ‘reasonable’ time frame should be determined by the DFAT officer and DFAT partner based on an assessment by the DFAT partner of the partner or downstream partner capacity, risk and context. ‘Reasonable’ could be anywhere between 6 and 18 months.

Where these organisations are downstream partners of DFAT partners, the DFAT partner is responsible for ensuring action plans are realistic, risk-sensitive and implemented within a reasonable time frame. DFAT partners are also responsible for monitoring progress and providing technical assistance and capacity-building where needed.

A simple Action Plan could use the following template or equivalent:

| **DFAT Child Protection and PSEAH Standard** | **Describe the Essential Standard practices already in place** | **Describe the planned Comprehensive Standard practices to be developed or implemented** | **Planned date of completion of Comprehensive Standard** |
| --- | --- | --- | --- |
| 1. **Policy, Procedures, and Code of Conduct** | *Enter text* | *Enter text* | *Enter text* |
| 1. **Reporting Mechanism and Investigation Procedures** | *Enter text* | *Enter text* | *Enter text* |
| 1. **Risk Management Processes** | *Enter text* | *Enter text* | *Enter text* |
| 1. **Training** | *Enter text* | *Enter text* | *Enter text* |
| 1. **Recruitment and Screening Processes** | *Enter text* | *Enter text* | *Enter text* |

**Strengthening actions or support required:**