

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
- Chapter 2: Understanding the risks
- Chapter 3: Implementing Child Protection and PSEAH Standards
- Chapter 4: 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) which are 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

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)
- 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)
- 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	None
	with children	
Incidental or minimal contact	Activities where interaction with children is	Essential Standards
with children	limited, indirect or incidental	
Direct, sustained or significant	Activities involving regular or ongoing	Comprehensive
contact with children	interaction with children	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	Office-based roles, including attending meetings or training	
children	 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	The focus of the activity is solely engaged with adults but is in a setting where	
minimal contact	children may be present. This could be in any community or institutional	
with children	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	

Level of contact	Examples of activities		
	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,	 Activities involving children where individuals may be in a position of trust, 		
or significant	influence, supervision, or authority over children.		
contact with	 Could include one-off interaction of ongoing interactions 		
children	 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 - Complete the checklist with a Yes or No response.

Risk factor	Guiding questions	Yes/No
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)	

Risk factor	Guiding questions	Yes/No	
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?		

If the answers to any of these questions 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 <u>Chapter 3</u> of this guidance).

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
 - o this means that most DFAT partners will need to apply at a minimum, the Essential Standards whether in Australia or overseas.

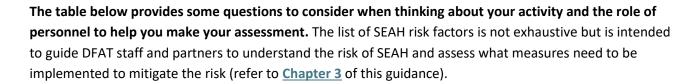
Important Note on Higher Risk Contexts

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	None or consider Essential
	equipment or materials in a low-risk setting	Standards in development or
	Remote, desk-based policy advice or writing	humanitarian and
		peacekeeping settings
Low to Medium	Attendance at or delivery of goods or services at	Essential
Risk	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.	
High Risk	 Implementation of programs in development, 	Comprehensive
	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 	



Understanding SEAH risks

Complete the checklist with a Yes or No response.

Risk factors	Guiding questions	Yes/No
	Is the activity in a developing country or humanitarian and	
High risk setting	peacekeeping setting?	
riigii risk settilig	Are there high rates of gender-based violence in the country where the	
	activity is occurring?	
	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	
High risk activities	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	Personnel will be deployed internationally, or in a remote or rural	
degree of isolation	location (outside their usual residence or organisation)?	
	are young adults	
	have a disability	
	are of an ethnic, indigenous, religious or sexual minority	
1.1	are experiencing poverty	
Interaction with	are sex workers	
individuals,	are part of families impacted by disasters	
especially women who:	are displaced, refugees, migrants or asylum seekers	
wiio.	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	
	Involves direct one-on-one or group access to adults online?	
	Involves supervising online contact?	
Online contact or	Involves online access to personal or confidential information?	
access to personal	Involves supporting adults on cyber safety?	
details	Involves access to sensitive/confidential personal information e.g.	
	health care workers, counselling services, medical personnel,	
	humanitarian aid coordinators?	
Degree of physical	Involves demonstrating a skill to adults?	
contact	Position involves physical contact with or touching adults?	
Degree of	Monopoly on provision of goods and/or services	
monopoly/	services for vulnerable groups of women (eg. escaping	
provision of goods	trafficking or gender-based violence)?	
and/or services that	food distribution?	

Risk factors	Guiding questions	Yes/No
may create a power	medical supplies?	
imbalance	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?	
	For example:	
	security workers	
Staff or personnel	• police	
who have an actual	• teachers	
or perceived level of	aid workers	
authority	humanitarian workers	
	medical personnel	
	security services	
	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	
Organisational risk	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 	

If the answer to any of these questions 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 <u>Chapter 3</u> of this guidance).

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.

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.

13

Requirement	Guidance
	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
	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 / PSEAH or a Safeguarding Policy	 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.

Guidance		
hild, abuse,		
sible, align		
describe		
may also		
of the		
olicy or		
h of the		
n it as a		
relevant		
sent, safety,		
dren.		
-DFAT		
ges occur.		
4. 46		
up to the		
l areas		
e: working		
mergency		
or data		
res that		
ice day-to-		
our		
ross your		
OSS YOUI		
al		
ust be		
13t BC		
odes –		
r		
priate.		
• • • • • • • • • • • • • • • • • • • •		
ations in all		
- "		

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 <u>Principles for Reporting and Investigation Mechanisms table</u> below for further guidance.
Confidential management of incident reports	 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	
Awareness of reporting and investigation procedures	 Appropriate disciplinary actions Refer to the Principles for Reporting and Investigation Mechanisms table below for detailed considerations for each of these principles. 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 	

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:
	o 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	Implement a whistleblower policy
retaliation	Ensure people feel safe to report
	 DFAT partners must not tolerate retaliation against:
	 Victim-survivors or complainants
	 Cooperators in investigations
Trauma-	Recognise and respond to trauma:
informed	 Minimise re-traumatisation
	 Recognise signs of trauma or distress
	 Support staff with managing vicarious trauma
	Provide appropriate support for victim-survivors
Procedural	Ensure objectivity and impartiality
fairness	o All parties treated equally
	 No conflict of interest
	 Facts-based approach
	Ensure independence and non-interference

Principles	Guidance
	 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	Investigations should occur within a reasonable timeframe
responsive	Acknowledge all complaints with:
	 Receipt confirmation
	 Expected investigation timeframe
	Follow up with the victim-survivor on outcomes
Privacy	Ensure privacy through:
protections	 Confidentiality measures (see above)
	 Secure data management
	 Informed consent procedures
Support for	Offer support regardless of participation in an investigation:
victim-survivors	o Medical care
	 Psychological support
	 Legal assistance
	 Socio-economic support
	 Referrals to reputable service providers
Appropriate	If an incident is substantiated take proportionate disciplinary action,
disciplinary	such as:
actions	 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

20

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** preferably using the DFAT Incident Notification Form .

Suspected, alleged or known incidents of **sexual exploitation**, **abuse or harassment** of adults must be submitted via <u>seah.reports@dfat.gov.au</u> 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 (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). 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.

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	 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 <u>guidance below</u> 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.

Requirement	Guidance
	 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**.

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	Ensure supervision, use buddy systems, enforce two-adult rule,
children	avoid one-on-one situations
Unverified local partners with	Conduct due diligence, include safeguarding clauses in MOUs
access to communities	
No complaint mechanisms for	Establish child-friendly and confidential reporting channels,
children or women or low	conduct awareness raisings, advertise mechanisms with visible
awareness of mechanisms	posters
Aid distributed in exchange for	Train staff on power dynamics and SEAH policy; monitor
favours or access	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	Require police checks, reference checks, and safeguarding
screening	declarations
Weak legal protections in local	Apply DFAT child protection/PSEAH standards regardless of
context	local law
Partner lacks safeguarding	Require partner to adopt child protection and PSEAH policy as
policy	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 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.
Basic training	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)?

Requirement	Guidance
	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	
	 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:

How to meet the Comprehensive Standard

Requirement	Guidance		
	Recruitment and integrity screening of personnel should include:		
Integrity	reference checks		
screening	criminal record (police) checks		
	working with children or vulnerable people checks		

Requirement	Guidance				
	or where these are not feasible, a self-declaration.				
	Refer to guidance below 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:
 - o 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?
 - o 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:
 - o ACT and Tasmania: Working With Vulnerable People Check
 - o 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 selfdeclaration from the candidate.
- The declaration must disclose any charges, convictions or disciplinary actions related to:
 - o 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 <u>International Development Policy</u> 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 <u>DFAT Guidance Note: Locally Led Development</u>, 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						
2. Reporting						
Mechanism and						
Investigation						
Procedures						
3. Risk Management						
Processes						
4. Training						
5. Recruitment and						
Screening Processes						
Strengthening actions or support required:						