



Australian Government  
Department of Foreign Affairs and Trade



# Protection from Sexual Exploitation, Abuse and Harassment Policy

SEPTEMBER 2025





Three Technicians Surrounded By Solar Panels On Solar Farm in Australia. Photo Credit: Getty

FRONT COVER IMAGE: Juventude ba Dezenvolvimentu Násional (JDN) is a Timorese NGO founded by young people. The Australian Volunteers Program partners with JDN to support their vital work, including advocating against sexual harassment, nutrition education and youth leadership development. Photo credit: Australian Volunteers Program/Harjono Djoyobisono

# INTRODUCTION

The Department of Foreign Affairs and Trade (DFAT) has a zero-tolerance approach to sexual exploitation, abuse and harassment (SEAH). Australia is committed to end all forms of gender-based violence<sup>1</sup> and to international initiatives<sup>2</sup> to prevent and respond to SEAH. DFAT launched its first Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy in 2019 (the Policy). This updated Policy reflects DFAT's commitment to best practice, including by incorporating the term 'Protection' to emphasise the importance of prevention and response. The updated Policy also aligns with new legislation, including the **Respect at Work legislation**, and reflects recent international commitments, including the 2024 **Common Approach to Protection from Sexual Exploitation, Abuse and Harassment (CAPSEAH)**.

Sexual exploitation, abuse and harassment are forms of gender-based violence and abuses of power causing profound harm to individuals and communities. SEAH takes many forms, including grooming, coercion, transactional sex, sexual harassment, sexual assault and rape. It can occur alongside other crimes, such as human trafficking. It can be perpetrated by one or more individuals against one or more victim-survivors – in person or in digital spaces. No workplace, country or sector is immune. While anyone can be affected, SEAH is primarily perpetrated by men against women and girls. DFAT is committed to preventing SEAH in all forms and to fostering a culture of respect and safety across all areas of its work.

The Policy applies to all DFAT business in Australia and overseas, including to all DFAT staff, DFAT partners and downstream partners. The Policy relates to adults impacted by SEAH. Incidents of sexual abuse perpetrated against individuals under the age of 18 years must follow the DFAT Child Protection Policy and relevant legal frameworks. This Policy should be read in conjunction with the **DFAT Child Protection Policy**. As per DFAT's Unacceptable Workplace Behaviour Policy, all employees and other workers have shared obligations for creating positive, professional, respectful, inclusive and safe workplaces. The duty to prevent harm is underpinned by the *Work Health and Safety Act 2011*, the *Sex Discrimination Act 1984*, the *Modern Slavery Act 2018* and the *Fair Work Act 2009*. This Policy aligns with DFAT's **International Disability Equity and Rights Strategy**, **International Gender Equality Strategy**, **International Engagement Strategy on Human Trafficking and Modern Slavery** and DFAT's Enterprise Risk Management Policy.

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## Zero-Tolerance

The Department of Foreign Affairs and Trade (DFAT) has a zero-tolerance approach to sexual exploitation, abuse and harassment (SEAH).

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1 In particular, the National Plan to End Violence against Women and Children 2022–2032.

2 Chiefly, the Collective Statement of the Members of the Secretary-General's Circle of Leadership on the Prevention of and Response to Sexual Exploitation and Abuse in United Nations Operations; the Tidewater Joint Statement on Combating Sexual Exploitation and Abuse in the Development and Humanitarian Sectors; the Whistler Declaration on Protection from Sexual Exploitation and Abuse in International Assistance; the commitments made by donors at the 2018 United Kingdom Safeguarding Summit; and the 2024 Common Approach to PSEAH (CAPSEAH).



## PURPOSE

The Policy establishes DFAT's framework for protecting people from SEAH across DFAT business, ensuring that all DFAT staff and partners proactively prevent, mitigate and respond to SEAH. A risk-based and 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.

In summary, DFAT staff and partners are expected to:

- prevent sexual exploitation, abuse and harassment by embedding SEAH protections into all DFAT business, including complying with the **positive duty** under the *Sex Discrimination Act 1984*
- promote accountability by monitoring and managing risks and ensuring compliance with the Policy
- create safe and accessible reporting mechanisms for raising concerns without fear of retaliation
- report any incidents, allegations or suspicions of sexual exploitation, abuse and harassment
- respond effectively to SEAH reports, prioritising victim-survivor rights and wellbeing, and holding perpetrators to account
- comply with relevant Australian and/or local legislation.

## SCOPE

The Policy applies to all DFAT business. This includes, but is not limited to, the business carried out by partners and contractors working across Development and Humanitarian programs, Foreign Policy and Diplomacy, Corporate, Trade, Passports, Consular Services, Scholarships and Fellowships, Volunteers, Labour Mobility and Public Diplomacy activities.

**DFAT staff:** Employees under the *Public Service Act 1999*, locally engaged staff, independent contractors, and family members of DFAT staff visiting, or residing in, DFAT premises.

**DFAT partners:** Managing contractors, corporate suppliers, universities, non-government organisations, research institutions, multilateral organisations, international organisations, grant recipients, and all downstream partners engaged in DFAT business, as well as Australian government and bilateral partners who have agreements in place with DFAT (funded and unfunded).

Australian Government and partner governments, multilateral organisations and regional bodies are expected to act in accordance with the principles outlined in this Policy. They must also adhere to their own legislation, regulations and policies. DFAT works collaboratively with these partners to enable alignment with the Policy's principles and to integrate PSEAH measures into joint initiatives, agreements and frameworks.

**Individuals:** Including but not limited to scholarship, fellowship and mobility grant recipients, volunteers, alumni, labour mobility participants and other grant recipients.

## KEY DEFINITIONS

**Sexual exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including but not limited to profiting monetarily, socially or politically from the sexual exploitation of another. For example, coercing individuals into engaging in sexual activities in exchange for aid, services, employment opportunities or other benefits.

**Sexual abuse:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes all forms of sexual assault, rape, molestation and other forms of non-consensual sexual activity.

**Sexual harassment:** Any unwelcome conduct of a sexual nature that occurs in circumstances in which a reasonable person, aware of those circumstances, would anticipate that the person being harassed might feel offended, humiliated or intimidated.

Sexual harassment can take many forms. It can be overt, covert or subtle. It can be repeated or a one-off incident. Sexual harassment can happen in person, over the phone or online – including via social media. Anyone can experience sexual harassment, regardless of their sex, gender identity, sexual orientation or intersex status.<sup>3</sup> Examples include but are not limited to: unwelcome physical touching, jokes, comments or messages of a sexual nature; suggestive looks, staring or leering; display of or circulation of pornographic material; and sharing or threatening to share intimate images or video without consent.

**Victim-survivor:** Victim-survivor is a term used to describe a person who is, or has been, sexually exploited, abused or harassed. The term ‘victim-survivor’ acknowledges both the harm suffered (victim) and the resilience or agency of the individual in coping with the aftermath (survivor). This term emphasises a supportive, rights-based approach to addressing their needs and upholding their dignity throughout the reporting and response process.

Sexual exploitation, abuse and harassment can be perpetrated against beneficiaries of DFAT programs, community members, citizens and non-citizens, DFAT staff and the personnel of partner organisations (see below for further information on scope).

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## What is safeguarding?

Safeguards are measures taken to avoid or minimise the potential negative impacts of DFAT’s operations, business activities and development programs on the communities and the environments in which we work and operate. In the context of this Policy, DFAT seeks to promote safe and respectful workplaces and minimise the risks of SEAH in its operations.

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<sup>3</sup> Information Guide on the Positive Duty under the *Sex Discrimination Act 1984* (Cth), Australian Human Rights Commission.



A fatele, performed in honour of the visit of the Tuvaluan Prime Minister in July 2025. Photo credit: WolfLab

# PRINCIPLES

The Policy is underpinned by the following principles.

## **Principle 1: Zero tolerance for sexual exploitation, abuse and harassment**

DFAT has zero tolerance for sexual exploitation, abuse and harassment in all aspects of its work. This means zero tolerance for acts of SEAH and zero tolerance for inaction to prevent, report or respond to SEAH.

## **Principle 2: Take a victim-survivor-centred approach to SEAH prevention and response**

Action to address SEAH should be underpinned by a 'do no harm' approach prioritising the safety, rights, needs and wishes of the victim-survivor. This approach treats victim-survivors with dignity and respect, keeps them informed, protects their confidentiality and involves them in decision-making. Responses to incidents must be trauma-informed and enable access to support services.

## **Principle 3: Promote inclusion and equity and recognise diversity**

DFAT and partners must ensure all actions and decisions are inclusive and equitable, recognising that people may be at increased risk of SEAH due to age, gender identity, sexual orientation, disability, ethnicity, socio-economic status, displacement, or other factors. Efforts must address barriers to participation, protection, reporting and support such as language, safety, discrimination and accessibility.

## **Principle 4: Prioritise prevention**

DFAT and partners must be proactive in minimising the risk of SEAH and creating safe environments in all contexts, both in the physical environment and online. Actions to prevent SEAH and promote safety must be embedded in policies, programs, recruitment, staff training and daily operations to minimise risks.

## **Principle 5: Adopt an empowering and participatory approach**

A participatory approach builds trust, increases relevance and promotes shared responsibility for safeguarding. People in communities, especially women, girls, and other groups in vulnerable situations, play a vital role in safeguarding efforts. Organisations must consult these stakeholders when assessing SEAH risk and in developing effective, culturally relevant measures to prevent SEAH. Approaches should build on existing community and national mechanisms where these are already established and trusted.

## **Principle 6: Reporting incidents is mandatory**

DFAT requires mandatory and immediate reporting of SEAH concerns related to DFAT business (funded or unfunded). Reporting and response mechanisms must be clear, accessible and confidential. Reporting mechanisms must ensure that those who raise concerns are protected and that concerns are addressed effectively and in a timely and appropriate manner.

## **Principle 7: Embed safeguarding into organisational culture and leadership**

DFAT and partners must embed the prevention of SEAH in governance, leadership and institutional culture. A strong safeguarding culture requires clear accountability, leadership commitment, investment of resources and continuous review and improvement of policies and practices.



## RISK-BASED APPROACH

The Policy applies a risk-based approach, ensuring that PSEAH Standards are proportionate to the level of risk. Further guidance and details on the Standards and the risk-based approach are provided in Attachment A: *Protection from Sexual Exploitation, Abuse and Harassment Standards for DFAT Partners*, and in the *Child and Adult Safeguards Implementation Handbook*.

## ROLES AND RESPONSIBILITIES

### **DFAT staff must:**

- adhere to the principles of this Policy as well as the internal DFAT Unacceptable Workplace Behaviour Policy
- comply with DFAT's mandatory reporting requirements
- incorporate PSEAH into the due diligence processes for partners
- include mandatory SEAH clauses in all agreements, grants and contracts
- undertake SEAH risk assessments
- monitor partner compliance with this Policy
- comply with relevant Australian and/or local legislation.

*The PSEAH Standards for DFAT Partners outlined in Attachment A do not apply to DFAT staff.*

### **DFAT partners must:**

- adhere to the principles of this Policy
- comply with DFAT's mandatory reporting requirements
- comply with relevant Australian and/or local legislation
- take a risk-based approach in applying the PSEAH Standards as required (Attachment A)
- put controls in place to manage and monitor the risk of SEAH and ensure processes are adhered to.

### **Individuals contracted by DFAT or partners or receiving DFAT-funded grants, scholarships or fellowships, and volunteers must:**

- sign and adhere to a code of conduct that aligns with this Policy
- comply with DFAT's mandatory reporting requirements
- comply with relevant Australian and/or local legislation
- provide a recent police check, working with children/vulnerable people check, or a locally appropriate alternative.



## REPORTING

Mandatory **immediate** reporting (within 24 hours) requirements apply to all DFAT staff and partners. Mandatory reporting includes any **suspected, alleged or known** SEAH incidents related to DFAT business. Failure to report in accordance with this Policy may result in disciplinary, contractual or legal consequences.

### How to Report

Reports must be submitted via [seah.reports@dfat.gov.au](mailto:seah.reports@dfat.gov.au) preferably using the **DFAT Incident Notification Form**.

Anyone can report an incident or concern to DFAT. Anonymous reports are permitted; however, DFAT may have limited ability to follow up on the report.

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 [seah.reports@dfat.gov.au](mailto:seah.reports@dfat.gov.au) for advice.

Victim-survivors 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.

All information provided to DFAT will be handled in accordance with the **Privacy Act 1988**.

For further guidance on reporting and response, see the *Child and Adult Safeguards Implementation Handbook*. For all inquiries regarding reporting, please contact [seah.reports@dfat.gov.au](mailto:seah.reports@dfat.gov.au).

DFAT staff and partners may have additional obligations to make a mandatory report to Australian and/or overseas local law enforcement. Please contact [seah.reports@dfat.gov.au](mailto:seah.reports@dfat.gov.au) or seek independent legal advice.

### Reports in relation to DFAT staff

Reports in relation to DFAT staff/family members as perpetrators can be reported to [conduct@dfat.gov.au](mailto:conduct@dfat.gov.au). DFAT staff who experience SEAH can contact DFAT's Safe Space for support and advice. The Safe Space team are trained in providing first response support to employees who raise concerns or make a report.

### 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, such as modern slavery, 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*.

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## Reporting

Mandatory immediate reporting (within 24 hours) requirements apply to all DFAT staff and Partners. Mandatory reporting includes any suspected, alleged or known SEAH incidents related to DFAT business.

Reports must be submitted via [seah.reports@dfat.gov.au](mailto:seah.reports@dfat.gov.au)

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## TRANSACTIONAL SEX AND FRATERNISATION

**Transactional sex is prohibited for DFAT staff and personnel engaged by DFAT partners (refer to Scope), including downstream partners, in high-risk environments, including development, humanitarian and peacekeeping settings.**

A person can be sexually exploited through transactional sex (the exchange of money, employment, goods or services or other advantages for sex or sexual acts), even in places where sex work is legal.

In high-risk settings, it is often impossible to distinguish between exploitative and non-exploitative transactional sex. Where there are power imbalances at play (based on gender, age, ability, authority, social and economic inequality, etc), the potential for exploitative transactional sex is heightened. **For these reasons, transactional sex is prohibited in all high-risk environments.**

**Fraternisation** refers to any intimate or social relationship occurring in the course of conducting business. This could involve – or appear to involve – partiality, preferential treatment or improper use of rank or position, including but not limited to consensual sexual behaviour.

Where there are power imbalances at play (based on gender, age, ability, authority, social and economic inequality, etc), particularly in high-risk settings, including development, humanitarian and peacekeeping settings, the potential for exploitative fraternisation is heightened. For this reason, **serious consideration and care should be taken before fraternisation occurs.** DFAT partners should consider the risks of exploitative fraternisation within their SEAH risk assessments to determine if it should be prohibited in high-risk contexts or activities.

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Transactional sex is prohibited for DFAT staff and personnel engaged by DFAT partners including downstream partners, in high-risk environments, including development, humanitarian and peacekeeping settings

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## COMPLIANCE WITH THIS POLICY

DFAT will monitor compliance with the Policy through a range of approaches including contractor performance assessments, reviews, non-government organisation accreditation processes and due diligence assessments. DFAT partners and contractors are expected to put in place appropriate measures to ensure they comply with this Policy.

Non-compliance with requirements may lead to DFAT suspending or terminating an agreement.

## LEGISLATION RELEVANT TO PSEAH

A range of laws are relevant to this Policy, including Australian Commonwealth, state and territory laws, and local laws in countries where DFAT works. Australia has also made international commitments to protection from sexual exploitation, abuse and harassment.

### 1. Relevant Australian legislation

*Please note that this is not an exhaustive list.*

**Age Discrimination Act 2004**

**Australian Human Rights Commission Act 1986**

**Australian Public Service Commissioner's Directions 2022**

**Fair Work Act 2009**

**Modern Slavery Act 2018**

**Privacy Act 1988**

**Public Service Act 1999**

**Sex Discrimination Act 1984**

States and Territories may also have legislation relevant to sexual exploitation, abuse and harassment.

### 2. Local legislation

Countries in which DFAT operates may have legislation relating to sexual exploitation and abuse. When working in-country, DFAT staff, partners and individuals or the personnel of contractors and organisations undertaking activities funded by DFAT are required to abide by local legislation.

### 3. Global commitments

Australia has made a number of global commitments to prevent and respond to sexual exploitation, abuse and harassment. These include adherence to the UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse, the Inter-Agency Standing Committee's Six Core Principles Relating to Sexual Exploitation and Abuse, and participation in international declarations such as the Joint Statement and 22 Commitments (2018), the Tidewater Joint Statement, and the Whistler Declaration. Australia's Prime Minister is also a member of the UN Secretary-General's Circle of Leadership, affirming high-level political commitment to ending SEAH in development settings.

## CHILD AND ADULT SAFEGUARDS IMPLEMENTATION HANDBOOK

To support the implementation of this Policy, DFAT has developed a *Child and Adult Safeguards Implementation Handbook* for DFAT staff and partners. This Policy should be read in conjunction with the handbook, which includes more detailed guidance on assessing and managing child protection and SEAH risks.

## DATE OF EFFECT

The Policy is effective from 1 September 2025 and will be reviewed every five years. Lessons will be incorporated into subsequent versions. Questions or suggestions to strengthen the Policy may be sent to [seah.reports@dfat.gov.au](mailto:seah.reports@dfat.gov.au).



The Australia-Indonesia Partnership Towards an Inclusive Society (INKLUSI) increases the contribution of civil society, in partnership with government, to gender equality, and disability and social inclusion. Photo credit: INKLUSI



# ATTACHMENT A: Protection from Sexual Exploitation, Abuse and Harassment Standards for DFAT Partners

The DFAT PSEAH Policy applies a risk-based approach, ensuring that PSEAH standards applied to DFAT business are proportionate to the risk. This approach requires DFAT staff and partners to assess activities, including those of any downstream partners, to identify risk factors for SEAH. This risk assessment will determine if you need to apply the PSEAH standards, and if so, whether Essential or Comprehensive. DFAT staff and partners must document these assessments and continue to monitor for any change in the risk settings.

SEAH is perpetrated in workplaces and communities in all sectors and countries. The risk of SEAH is not limited to work internationally. According to the Australian Human Rights Commission, one in three people have experienced sexual harassment in Australian workplaces in the last five years.<sup>4</sup> Given how widespread SEAH is, and the complex settings in which DFAT operates, most DFAT activities should be rated as at least a medium risk of SEAH. Therefore, most DFAT partners will need to apply at a minimum, the Essential Standards whether in Australia or overseas. Very few activities would be considered low risk but could for example, include corporate goods and services delivered in a low-risk setting.

The risk of SEAH is higher where unequal power dynamics and gender inequality exist. All DFAT partners delivering programs in high-risk settings, including but not limited to development, humanitarian and peacekeeping settings must meet the Comprehensive Standards.

DFAT recognises that small, locally based organisations that work in high-risk settings may need time and support to achieve full compliance with the Comprehensive Standards. In such cases, these organisations are required to implement the Essential Standards to mitigate immediate risks, while taking a phased implementation approach to gradually build capacity and comply with the Comprehensive Standards over a reasonable timeframe.<sup>5</sup> Where these organisations are downstream partners, DFAT partners are responsible for ensuring any action plans are realistic, risk-sensitive and implemented within a reasonable timeframe. DFAT partners are also responsible for monitoring progress and providing technical assistance and capacity-building support where needed.

This approach requires these organisations to:

- fully implement the Essential Standards to address immediate risks
- document an action plan outlining specific steps and clear timeframes to achieve compliance with Comprehensive Standards
- implement and monitor progress against the action plan to achieve compliance with Comprehensive Standards.

DFAT partners who are unable to meet the Standards within the required timeframe require the DFAT delegate's approval. In seeking the delegate's approval, the risks associated with non-compliance and a plan for mitigating those risks should be detailed.

Further guidance on assessing the PSEAH risks can be found in the *Child and Adult Safeguards Implementation Handbook*.

While the PSEAH Policy applies to individuals, the PSEAH Standards are primarily aimed at organisations. Individual recipients and awardees of scholarships, fellowships or grants, and directly contracted individuals and volunteers are instead required to:

1. sign and adhere to a code of conduct aligned with this Policy
2. comply with DFAT's mandatory immediate reporting requirements
3. provide, if required, a recent police check, working with children/vulnerable people check, locally appropriate alternative or where this is not possible, a self-declaration.

<sup>4</sup> Australian Human Rights Commission, 2024. Annual Report 2023 – 2024.

<https://humanrights.gov.au/our-work/commission-general/publications/annual-report-2023-24>

<sup>5</sup> Reasonable timeframe should be determined by the DFAT officer and DFAT partner based on an assessment of the DFAT partner or downstream partner capacity, risk and context. 'Reasonable' could be anywhere between 6 and 18 months.

PSEAH STANDARDS		
Standard	Essential	Comprehensive
<b>1. PSEAH policy and procedures, including a code of conduct</b>	<p>The organisation has a PSEAH policy/statement or other documented policies and procedures which meet the expectations of DFAT's PSEAH Policy.</p> <p>The organisation has a Code of Conduct which 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.</p> <p>Downstream partners are encouraged to develop their own policies, procedures and codes specific to SEAH, but may adopt the policies of their upstream partner if appropriate.</p>	<p>The organisation has a detailed PSEAH Policy and procedures in place which meet the expectations of DFAT's PSEAH Policy and are subject to regular review.</p> <p>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.</p> <p>Downstream partners are encouraged to develop their own policies, procedures and codes specific to SEAH, but may adopt the policies of their upstream partner if appropriate.</p>
<b>2. Reporting mechanism and investigation procedures</b>	<p>The organisation can receive and manage incident reports safely and confidentially.</p> <p>Reporting mechanisms are accessible to all stakeholders.</p> <p>The organisation must report incidents and investigation outcomes to DFAT.</p>	<p>The organisation has a well-publicised, accessible, confidential and safe mechanism for reporting SEAH concerns or incidents which includes protections from retaliation.</p> <p>The organisation has documented procedures for managing SEAH incidents that include trauma-informed responses, procedural fairness, transparent and timely investigation processes, privacy protections and support for victim-survivors, and appropriate disciplinary actions if the incident involves their personnel.</p> <p>The organisation ensures communities are informed about expected behaviours, reporting mechanisms and investigation processes in accessible and culturally appropriate ways.</p> <p>The organisation must report incidents and investigation outcomes to DFAT.</p>
<b>3. Risk management processes</b>	<p>The organisation undertakes a SEAH risk assessment, including mitigation actions tailored to the activities and context, that is reviewed at least annually and revised as needed.</p>	<p>The organisation undertakes a SEAH risk assessment including mitigation actions tailored to the activities and context, that is reviewed at least annually and revised as needed.</p> <p>The organisation must provide documented evidence that senior management and executive boards have visibility of SEAH risk management.</p> <p>The organisation has documented evidence of its expectations for downstream partners and how those partners will manage SEAH risk.</p>
<b>4. PSEAH training</b>	<p>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.</p>	<p>The organisation provides comprehensive PSEAH training – regularly reviewed – to all relevant personnel advising personnel of rights, obligations and responsibilities. Personnel are required to complete the training annually.</p>
<b>5. Recruitment and screening processes</b>	<p>The organisation conducts recruitment and integrity screening for all personnel.</p> <p>Screening should include reference checks, recent police checks, Working with Children or Working with Vulnerable People checks, locally appropriate alternatives or, where these are not feasible, a self-declaration.</p>	<p>The organisation conducts recruitment and integrity screening for all personnel. Screening should include reference checks, recent police checks, working with children or working with vulnerable people checks, locally appropriate alternatives or, where these are not feasible, a self-declaration.</p> <p>Additional integrity measures required include targeted messaging and questioning about safeguarding at all stages of recruitment and onboarding, and ongoing monitoring of staff behaviour and adherence to PSEAH and safeguarding policies and processes.</p>

