

# PREVENTION OF SEXUAL EXPLOITATION, ABUSE, AND HARASSEMENT POLICY

<b>Approved By</b>	I Komang Andreas Ketua Yayasan Stella Anak	Timothy J Cameron Executive Director Stella's Child
<b>Issue Date</b>	March 3, 2025	
<b>Review Date</b>	March 3, 2029	

---

## INTRODUCTION

This policy affirms Stella's Child fundamental belief that every member has the right to be protected and free from sexual exploitation, abuse and harassment. Stella's Child endorses that this Policy considers relevant national and international standards including the UN Convention on the Preventing Sexual Exploitation and Abuse, The Australian Government's Prevention of Sexual Exploitation, Abuse, and Harassment. This Policy operates in conjunction with common and statute law and does not exclude or replace any rights and obligations under Indonesian Law Number 12 of 2022 about Sexual Violence Offenses.

This policy seeks to address the important issue of prevention of sexual violence for child or adults at all levels affected by the work and operations including all activities of Stella's Child program, and will be revised regularly to ensure it remains relevant and complies with current legislation. Stella's Child believes that the protection of children and adult from abuse, sexual exploitation, abuse, and harassment (SEAH) is the responsibility of all those who participate in the work space and operations of Stella's Child, including staff, directors, volunteers, interns, contractors and customers.

---

## 1. PURPOSE OF POLICY

This policy provides a practical guide to prevent child and adult from sexual exploitation, abuse, and harassment in Stella's Child operations, activities, and programs and it demonstrates Stella's Child commitment to protect basic human right for all people. It aims to educate Stella's Child staff, directors, interns, contractors and customers (**Stella's Child representatives**) about sexual abuse of child and adult and promote a safe and a friendly culture where everyone is committed to keeping everyone safe from harm.

Additionally, the policy provides guidance on how to respond to concerns and allegations of sexual violence. As well as how the incident is handled.

Stella's Child must adhere to Indonesian and international prevention of sexual exploitation, abuse, and harassment policy, which prohibit the sexual violence for all members. And adhere to Indonesian and international law on criminal acts of sexual violence. These include Indonesian laws where Stella's Child programs exist, and international laws and Conventions in relation to all forms of sexual violence, including: sexual exploitation, sexual abuse, and sexual harassment.

Adherence to this policy is a mandatory requirement for all Stella's Child representatives.

## 2. PREVENTION OF SEXUAL EXPLOITATION, ABUSE, AND HARASSEMENT POLICY SCOPE AND PERSONS AFFECTED

The following individuals must comply with this policy while performing their duties and representing Stella's Child:

1. Stella's Child Board of Director and Board of Member
2. Stella's Child Staff
3. Stella's Child Volunteer and Mentor
4. Sponsorship Partners and Businesses
5. Program Participants

All of the aforementioned must comply with the standards of behaviour set out in this Stella's Child Prevention of Sexual Exploitation, Abuse, and Harassment Policy.

These individuals and groups are expected to act in accordance with the principles and reporting requirements outlined in this Policy. They must also abide by their own relevant policies, international declarations, conventions, agreements and domestic legal frameworks that relate to preventing sexual exploitation, abuse and harassment.

## 3. CORE PRINCIPLES

1. All humanitarian and development workers are required to create and maintain an environment that prevents all forms of sexual violence against children and vulnerable adults, while ensuring adherence to the Stella's Child Code of Conduct. Managers at all levels are responsible for supporting and establishing systems that uphold this environment. Any allegations of sexual exploitation, abuse, or harassment (SEAH) will be taken seriously and addressed promptly. Stella's Child will not tolerate any violation of these principles.

- 
2. Strong leadership is essential to set organisational culture, and therefore leaders need to set clear expectations and model respectful behaviour in their interactions at work. This will support communities, victims/survivors and whistleblowers to feel safe, report concerns and be assured their allegations are taken seriously.
    - Strong leaders address SEAH by taking measures to improve diversity and inclusion. This can include:
    - strong, actionable human resource procedures that embed gender equality and PSEAH.
    - inclusion of PSEAH discussions in board meetings.
    - encouraging staff gender balance particularly in senior roles.
  3. A survivor-centred approach puts the safety, wishes and interest of the survivor first, above all other considerations. This means that the survivor should be empowered. They must be in control. What the survivor needs and wants must be at the centre of any assistance we give. This approach:
    - Treats the survivor with dignity and respect.
    - Involves the survivor in decision making.
    - Provides the survivor with comprehensive information.
    - Protects privacy and confidentiality.
    - Does not discriminate based on gender, age, race/ethnicity, ability, sexual orientation, or other characteristics.
    - Considers the need for counselling and health services to assist the victim/survivor with their recovery.
  4. Preventing Sexual Exploitation, Abuse and Harassment is everyone's responsibility. Real change to reduce SEAH will not occur unless every sector plays a role — partner, business sponsors, worker, volunteer, communities and individuals.
  5. Stella's Child particularly recognises that gender, disability, age, sexual orientation and poverty have powerful intersection points with the likelihood of SEAH. There are also power imbalances at play. Inequalities based on the distinctions of worker/beneficiary; ability/disability; ethnic and Indigenous status; religion; gender identity and sexual orientation; age; health and poverty, can also result in SEAH. The intersection of gender with other forms of inequality can further increase the likelihood of SEAH occurring.

Stella's Child actions promote gender equality, child protection & safeguarding, social inclusion and accountability towards a 'do no harm' approach.

6. Sexual exploitation, abuse and harassment is a failure of responsibility. Stronger reporting allows an organisation to better monitor SEAH, understand risks, improve assurance and work with organisations to improve systems and safeguards accordingly. Reporting will also help to focus organisations on the issue by providing a regular prompt that PSEAH is a core obligation of their work.

Stella's Child aims to prevent SEAH through implementation of this Policy, communication, training and working collaboratively with all workers and partner organisations to safeguard everyone against SEAH.

## 4. POLICY

Stella's Child will act at all times to ensure everyone's safety and protection. Stella's Child values its staff, directors, interns also customers and will support their active contribution to achieving this goal. The following list of expected behaviours applies to all of Stella's Child workers and Volunteers in both their personal and professional lives. At all times workers:

- Maintain a duty to act in a manner which upholds the values and reputation of Stella's Child
- Undertake to create and maintain a safe and trusted environment that promotes the

---

implementation of this Policy and safeguards everyone from SEAH.

- Comply with all relevant laws of the country of residence, or in which he or she is travelling.
- Be aware that sexual behaviour is an area of particular sensitivity, where conduct may more easily be seen as offensive or be misinterpreted.
- Avoid actions or behaviours that could be perceived by others as sexual exploitation, abuse or harassment underpinned by a 'do no harm' approach.
- Ensure personal conduct towards a co-worker is not exploitative or such that it reasonably leads to a perception of exploitation.
- Ensure photographs, films, videos, including those in social media posts, present vulnerable people in a dignified and respectful manner and not in a vulnerable or submissive manner. This includes ensuring that vulnerable people are adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure that social media use and the sharing of photographs, films and videos are underpinned by informed consent principles and documentation of the informed consent.
- Read and agree to abide by the expected behaviours outlined in the relevant code of conduct.
- Immediately report to Stella's Child Director, Deputy Director, or Human Resource Representative any concern, suspicion or allegation of SEAH or any alleged policy non-compliance. (Reporting procedures are outlined below).

In addition, Stella's Child workers must adhere to the following expected behaviours:

- Stella's Child workers must not engage in sexual relationships with volunteers, downstream partners, and beneficiaries as these relationships are based on inherently unequal power dynamics and there is the potential for abuse of power. Such relationships undermine the credibility and integrity of Stella's Child

It is strictly prohibited for Humanitarian, Development Workers, and Beneficiaries:

- Sexually exploit or abuse or sexually harass a child or adult.
- Use their position of trust and authority to request any service or sexual favour from beneficiaries of Stella's Child, adults, children or others in the communities in which Stella's Child works, in return for protection or assistance, or coerce a person to engage in sexual intercourse or any sexual activity.
- Exchange or withhold from beneficiaries of Stella's Child - adults, children or others in the communities in which Stella's Child works - money, food, employment, goods, assistance or services for sex or sexual favours or other forms of humiliating, degrading or exploitative behaviour.
- Use Stella's Child or partner organisation facilities, personnel or resources for the purpose of arranging or facilitating access to sex workers by any person, including visitors to Stella's Child offices or programs.
- Engage in sexual activity with a child under any circumstance. Even in a country where the age of majority or the age of consent is lower than 18 years, Stella's Child workers are forbidden to have sexual activity with anyone under the age of 18 years. A mistaken belief that the child is over 18 is no defence.
- Use computers, mobile phones, video cameras, cameras or other technology inappropriately, or to exploit or harass children and/or adults, or to access or disseminate child exploitative material and/or sexually exploitative material through any medium, including social media.
- Procure sex for others, and/or use a third party to do so.

All Stella's Child representatives will conduct themselves in a manner which ensures everyone rights and needs are always given priority. It is the responsibility of Stella's Child representatives to minimise this risk by promoting and being examples of good practice in identifying and managing potential risks. The Code

---

of Conduct describes the basic expectations of Stella's Child representatives regarding their contact and dealings with children and vulnerable adults.

Stella's Child recognises that each country has its own legal system. This policy and these standards must be interpreted and enforced in accordance with Indonesian law. There may be instances where the policy and standards are more stringent than Indonesian law, and in these cases the Stella's Child policy should be followed.

## 5. DEFINITIONS

To understand the scope of this policy, it is important to understand a number of concepts and definitions which are used in the policy.

- **Stella's Child Workers:** Individuals engaged in work-related activities under Stella's Child, including employees, contractors, interns, volunteers, and any other personnel performing duties on behalf of the organization.
- **Partners Organization:** Organizations that collaborate with Stella's Child to achieve shared objectives. These partnerships may include financial support, resource sharing, joint initiatives, or strategic alliances to maximize impact and sustainability.
- **Program Beneficiaries:** Individuals or groups who receive direct benefits from Stella's Child program's services, resources, or support. These may include students, trainees, community members, or other target populations the program aims to assist.
- **Stella's Child Representative:** Stella's Child staff, directors, interns, contractors and customers.
- **Safeguarding:** Actions, policies and procedures that create and maintain protective environments to protect people from exploitation, harm and abuse.
- **Sexual exploitation, abuse and harassment (SEAH)** occurs against a child or an adult and can occur between people of the same or different genders. It includes situations such as:
  - Sexual exploitation and abuse;
  - Sexual harassment;
  - Child sexual abuse and exploitation;
  - Women and men sexually exploited through sex work;
  - Possessing, controlling, producing, distributing, obtaining or transmitting sexually exploitative images of adults and children; and
  - Possessing, controlling, producing, distributing, obtaining or transmitting photographs or videos that may not be explicitly sexual in nature or sexually provocative, however they could be considered sexual in nature if for instance the image would likely cause offence, humiliation or intimidation to the subject of the image.
- **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, or for other personal or financial advantage. Includes benefiting socially or politically from the sexual exploitation of another or producing, obtaining or distributing child or adult exploitation material.
- **Sexual abuse:** the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions of a child or adult
- **Sexual Harassment:** any verbal or physical conduct or any conduct of a sexual nature that is unwelcome, uninvited or not reciprocated in circumstances in which a reasonable person, having regard to all the circumstances would have reasonably anticipated the possibility that the person harassed would be offended, humiliated or intimidated. This can include unwelcome sexual advances or unwelcome requests for sexual favours or displaying or sending sexually explicit images or asking intrusive questions about someone's personal life, including their sex life. Sexual harassment can take various forms. It can be direct and/or indirect, physical and/ or verbal, repeated or one -off instances

---

and perpetrated by any person of any gender towards any person of any gender. Sexual harassment can be perpetrated against beneficiaries of Stella's Child programs, program participants, community members, citizens, as well as employees and workers.

- **Child Sexual Abuse:** any act involving a child in sexual activity that they do not fully comprehend, are unable to give informed consent to, or that violates legal and social norms. This includes but is not limited to sexual contact, exploitation, grooming, and any form of coercion or manipulation for sexual purposes.
- **Child Sexual Harassment:** unwanted or inappropriate sexual behaviour directed at a child, including verbal, non-verbal, or physical actions that create an intimidating, hostile, or offensive environment. This may include inappropriate comments, gestures, exposure to explicit content, or any behaviour that violates a child's dignity and rights.
- **Child Exploitation:** one or more of the following:
  - Committing or coercing another person to commit an act or acts of abuse against a child.
  - Possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material.
  - Committing or coercing another person to commit an act or acts of grooming or online grooming.
  - Using a minor for profit, labour, sexual gratification, or some other personal or financial advantage.
- **Child Grooming:** behaviour that makes it easier for an offender to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child, and then seek to make that relationship a sexual one (for example by encouraging romantic feelings or exposing the child to sexual concepts through pornography).
- **Online Child Sexual Exploitation** (or child pornography) - in accordance with the Optional Protocol to the Convention on the Rights of the Child, 'child pornography' means 'any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes.
- **Child** – any person under the age of eighteen (18) years as defined by the Convention on the Rights of the Child irrespective of local country definitions of when a child reaches adulthood.
- **Vulnerable adults** - those aged over 18 years and who identify themselves as unable to take care of themselves/ protect themselves from harm or exploitation; or who, due to their gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.
- **Survivor** - A person who has SEAH perpetrated against him/her/them or an attempt to perpetrate SEAH against him/her/them.

## 6. BREACH OF POLICY

Sexual exploitation, abuse and harassment by Stella's Child workers, Partners, and Beneficiaries, constitute acts of gross misconduct and are therefore grounds for termination of employment, funding or services.

Disciplinary actions/possible outcomes for breach of the Stella's Child PSEAH Policy can include:

- Referral to local law enforcement authorities (as per national and any mandatory reporting laws), where appropriate.
- Referral to local Police Service.
- Internal investigation which may include an externally engaged investigator.
- Perpetrator standing aside with pay pending investigation.
- Performance management and disciplinary action including formal warnings.
- Training, mentoring and support where appropriate.

---

## 7. SHARED RESPONSIBILITY

All Stella's Child workers are responsible for championing good practice and maintaining an organisational culture that prioritises safeguarding against SEAH. Managers and leaders at all levels have responsibilities to support and develop systems that maintain an environment that facilitates implementation of the PSEAH Policy. This includes ensuring that Stella's Child workers, Partner, and Beneficiaries understand policy obligations. Managers and leaders must create a safe environment at Stella's Child for anyone to come forward and raise allegations or concerns of SEAH and immediately respond to any reports. This will be done by:

- Providing survivors with a safe (and protected) space, where survivors can speak.
- Ensuring informed consent, confidentiality and data protection with any recording and sharing of information.
- Offering referral to counselling and other support services, in line with the wishes and welfare of survivors.
- Assisting survivors to document and lodge a report, in line with the wishes of the survivor
- Clearly and openly communicating with survivors, including giving feedback on what will happen next.
- Inviting survivors to have a support person with them at any time in the reporting and response process.
- Making every effort to meet survivors' needs, including accommodating requests to have a person of a particular gender present at the time of disclosure.

## 8. PSEAH TRAINING

This policy will be made available to all staff, interns, customers and others visiting or involved with Stella's Child projects. It is the responsibility of the Director to ensure that all Stella's Child operational, including all unit business, have a copy of and that all Stella's Child staff are aware of, and trained on, this policy.

Mandatory PSEAH Training is provided to Stella's Child members including contractors, consultants, volunteers, interns, and anyone within the scope of policy as part of the induction process, and regular PSEAH refresher training is provided. Mandatory training related to Code of Conduct is also provided during the induction process.

The Director may nominate manager in each unit responsible for ensuring that all their representatives adhere to this policy. In situations where any part of the policy is in conflict with Indonesian law, that responsible person must bring this to the attention of the Director.

Staff will be made aware of the importance of their own responsibility in the upholding and implementation of this policy. Any violation of the policy (including any suspected or known abuse or exploitation) must be reported directly to the Director.

## 9. RECRUITMENT AND REFERENCE TRACKING

Stella's Child is committed to child safe recruitment, selection and screening practices. All Stella's Child representatives will be informed of this policy during the recruitment process. All employees and interns will be required to sign an acknowledgement that they have both read this policy and will comply with its requirements.

In addition, all new Stella's Child employees:

- Where Stella's Child determines it is necessary or appropriate, employees and interns, particularly those who conduct work that brings them into direct contact with children, must provide a "working with children" or similar clearance to assist Stella's Child to make background checks, which may include police or criminal history checks (see Appendix 4).
- All staff will be required to provide original proof of identity documents such as a birth certificate, passport, driver's licence and relevant qualifications, to prove their true identity when requested by Stella's Child to do so.
- At least two verbal reference checks with former employers/referees will be conducted. Verbal referees cannot include partners, spouse and / or other relatives. For any position deemed to be working with children, referees will be asked about the applicant's suitability for the role to work with children and /or to have regular unsupervised contact with children. Referees will be asked whether they hold any concerns about the applicant, or if complaints were made about the applicant, in connection with working or having contact with children.
- On commencement of work with Stella's Child, all employees/volunteers must sign an Employee Contract or Volunteer Agreement which includes the following statement:

*"Before signing this contract (agreement) I have read and signed Stella's Child Prevention of Sexual Exploitation, Abuse, and Harassment Policy Code of Conduct for Staff, and the Staff/Volunteer Declaration. I understand that I may be dismissed, suspended or transferred to other duties if I am under investigation or found to not comply with the Prevention of Sexual Exploitation, Abuse, and Harassment Policy Code of Conduct"*

Stella's Child may refuse to employ, or terminate the employment of, any person who it reasonably believes may pose a risk of sexual violence.

## **10. RISK MANAGEMENT PROCESS**

Stella's Child will take a risk-based, proportional approach to preventing and responding to SEAH. All activities are assessed for potential risk of SEAH occurring. Our responses and management measures will be specific to reduce and address risks within the contexts in which we work. This approach involves three steps:

- Risk Identification
- Risk Management Planning
- Applying appropriate mitigation measures and standards

## **11. ALLEGATION REPORTING, MANAGEMENT AND INVESTIGATION**

### **11.1 How to Report**

Stella's Child provides a safe, supportive and secure environment to report alleged incidences of SEAH or policy non-compliance. Stella's Child will take all concerns seriously and respond immediately and in accordance with Stella's Child and Donor reporting requirements, and subject to the wishes and welfare of the survivor. All reports of SEAH will be recorded through Stella's Child Incident Report System, regardless of whether substantiated or full investigation required and Stella's Child will de-identify complaints at the request of the survivor. The principles of natural justice will apply to all investigations. Stella's Child workers and representative must immediately report any concerns, suspicions or allegations of SEAH or alleged breach of the Stella's Child PSEAH Policy. A report should be made to one of the following people as applicable:

Stella's Child may report a concern regarding sexual exploitation, abuse and harassment or Policy breach to any of the following people:

- Stella's Child Director.
- Stella's Child Deputy Director.

- 
- Stella's Child Human Resources Representative.

Stella's Child workers may report a concern regarding sexual exploitation abuse and harassment or Policy breach to any of the following people:

- Stella's Child Director.
- Stella's Child Deputy Director.
- Stella's Child Human Resources Representative.

Visitors, beneficiaries, and Members of the Public may report a concern regarding sexual exploitation, abuse and harassment through:

- Stella's Child Director.
- Stella's Child Deputy Director.
- Stella's Child Human Resources Representative.

## **11.2 Managing Reports**

Anyone wishing to make a report anonymously needs to refer to the Stella's Child Whistleblower Protection Policy for information.

Anyone reporting a case of SEAH, in good faith, or any person who has cooperated with an investigation into a report of SEAH, will be protected by this Policy. Malicious and vexatious reporting of SEAH with the intention and/or result of harming another person's integrity or reputation amounts to serious misconduct and is subject to disciplinary action up to and including termination of employment. This is distinct from reports made in good faith based on the judgment and information available at the time of the report, which may not be substantiated by an investigation.

Reporting and investigation progress will include engagement of and reporting to the Organisational Leadership Team and Stella's Child Board members.

## **11.3 External Reporting**

Where safe to do so, and in accordance with the wishes and welfare of survivors, alleged SEAH incidents will be reported to appropriate local authorities. If an Australian Volunteers International's staff member or participant/volunteer are either the survivor or alleged perpetrator, Stella's Child must inform Australian Volunteers International immediately. Our timeframes are very strict; therefore, you must report immediately.

## **11.4 Investigations**

Stella's Child investigations of SEAH will be carried out in a manner that is timely, fair, objective and as far as is practicable, confidential. This includes the use of appropriate interviewing practice with complainants and witnesses. All information and documented evidence will be held securely and in the strictest confidence as far as is appropriate.

## **11.5 Survivor Support and Assistance**

Stella's Child will adopt a survivor-centred approach in preventing and responding to SEAH. Stella's Child will ensure that all responses are developed in a manner that balances respect for due process with a survivor centred approach in which the survivor's wishes, safety and wellbeing remain a priority in all matters and procedures. Furthermore, all actions taken should be guided by respect for choices, wishes, rights and dignity of the survivor.

Stella's Child will ensure survivors of SEAH are offered support and assistance such as referral to safe health/medical, psychosocial and legal/justice response where appropriate and where required to specialised children's or women's services.

Survivors will be provided with information on the progression of an investigation and final outcomes.

## 11.6 Partner Organisations

Stella's Child will work with Partner Organisations, funding donors and grantees in the prevention of SEAH and Partner Organisations will be advised of avenues available to report concerns regarding SEAH within Stella's Child.

## 12. RESPONSIBILITIES

Directors	Approve the policy, ensure the PSEAH is upheld, ensure Stella's Child meets its obligation, respond to, manage and investigate all PSEAH related disclosures. Provision of advice and coordination of PSEAH notifications; advice for policy implementation and support for training and policy awareness. Communicating the policy and procedures to workers
All workers	Understand and follow the organization's PSEAH Policy. Report all allegations of PSEAH to Stella's Child directors. Help directors manage and investigate all PSEAH related disclosures.
Beneficiaries	Understand and follow the organization's PSEAH Policy. Report all PSEAH allegations to Stella's Child directors or workers.
Partner (Sponsor, Volunteer, Donor)	Understand and follow the organization's PSEAH Policy. Report all PSEAH allegations to Stella's Child directors or workers.

## 13. RELATED POLICIES

In support of preventing sexual exploitation, abuse, and harassment, Stella's Child also implements Child Protection Policies within our organization.

## 14. Relevant External Policies

Below is a list of external policies that impact Stella's Child in ensuring the effectiveness of the SEAH (Sexual Exploitation, Abuse, and Harassment) Policy:

- Australian Department of Foreign Affairs PSEAH Policy
- United Nations Convention on the Rights of the Child (UNCRC)
- UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse
- Law No. 23 of 2002 on Child Protection (amended by Law No. 35 of 2014 & Law No. 17 of 2016)
- Law No. 12 of 2022 on Sexual Violence Crimes (UU TPKS)

## 15. Evaluation and Performance

Stella's Child will monitor compliance with the SEAH Policy through a range of approaches, including regular staff training, internal audits, reporting mechanisms, and feedback from beneficiaries and stakeholders. Monitoring will be aligned with our Child Protection Policy, Code of Conduct, and Safeguarding Framework to ensure continuous improvement and accountability in preventing sexual exploitation, abuse, and harassment.

---

## 16. Revision History

DATE	Revision Number	Change(s)
March 3, 2025	1	New Policy

## PREVENTION OF SEXUAL EXPLOITATION, ABUSE, AND HARRASEMENT CODE OF CONDUCT

I, \_\_\_\_\_, agree that I will comply with the PSEAH Policy, while visiting project activities funded by or related to Stella's Child, I will:

- Conduct myself in a manner that is consistent with the values of Stella's Child and the PSEAH Policy
- Maintain a professional role and establish clear professional boundaries that serve to protect everyone from misunderstandings or a violation of the professional relationship.
- Model appropriate behaviours to ensure a positive culture of respect is maintained.
- Be aware of and respect the cultural differences, sensitivities, and expectations of the communities in which we work, and refrain from any form of behaviour that would be deemed inappropriate in that setting.
- Provide a welcoming, inclusive, trusted, and safe environment for all people that promote the implementation of the PSEAH Policy.
- Be aware that sexual behaviour is an area of particular sensitivity, where conduct may more easily be seen as offensive or be misinterpreted.
- Comply with the guidelines on the use of images.
- Take responsibility for ensuring I am accountable and do not place myself in positions where there is a risk of allegations being made.
- Be transparent in my actions and whereabouts.
- Speak up when I observe concerning behaviours of colleagues.
- Immediately report any concerns of behaviour that contradicts the standards of behaviour outlined in the Code of Conduct.
- Follow the reporting processes below to report and/or respond to concerns in relation to safeguarding.
- Immediately disclose all charges, convictions and other outcomes of an offence that relates to sexual exploitation, abuse and harassment to any person, including those under traditional law, which occurred before or occurs during association with Stella's Child

I will not:

- Use any communication device including computers, mobile phones, video cameras, cameras or other technology inappropriately, or to sexually exploit or
- harass adults or children, or access or disseminate exploitative material through any medium, including social media.

### Prevention of Sexual Exploitation Abuse & Harassment Behaviours

I will:

- Immediately inform my line manager if I become engaged in a personal relationship which may be perceived as inappropriate or sexually exploitative; and/or where real or perceived unequal power dynamics exist e.g., if there is a reporting relationship; and/or if I am unsure if my relationship falls into this (SEAH) category.

I will not:

- Engage in sexual relationships with program participants or beneficiaries as such relationships are based on inherent power imbalances which have high risk of exploitation.

- 
- Use my position of trust and/or authority to request any service or sexual favour from partners or beneficiaries of stella's child programs, be they adults or others in the communities in which Stella's Child works, in return for protection or assistance; and/or coerce a person to engage in sexual intercourse or any sexual activity.
  - Exchange or withhold from beneficiaries of Stella's Child programs, funds services or support of any kind for sex or sexual favours or other forms of humiliating, degrading or exploitative behaviour.
  - Engage in transactional sex when travelling for or undertaking Stella's Child business even if it is legal in that respective state or country.
  - Use Stella's Child or partner organisation facilities, personnel or resources for the purpose of arranging or facilitating access to sex workers by any person, including visitors to Stella's Child offices or programs.
  - Procure sex for others or use a third party to do so.
  - If I am a non-national staff person, fraternise with in-country staff or partners while engaged in any work or actions related to Stella's Child

I confirm that at no time have I ever been involved in or convicted of any criminal offence, including an offence of or relating to sexual exploitation, abuse, and harassment, in any country. I have not been charged with any offence that is incomplete or awaiting legal action, nor am I aware of any investigation into my affairs that has the potential to lead to such charges.

---

**NAME**

---

**Signature**

---

**Date**

---

## Appendix 1: Use of Image Policy

---

### 1. CONSENT

- 1.1. Photos on location at any project site of Stella's Child Development must only be taken after permission has been granted by the person(s) to be photographed.
- 1.2. Photos of children on location at any project site of Stella's Child operational activities will not be taken unless consent has been obtained.
- 1.3. When possible, establish a relationship before you start taking photos. When you approach photo subjects on site, briefly introduce yourself, be courteous, and explain the purpose of your visit or the reason you want to take photos. In clinical contexts, speak with the captain vessel and paramedic officer before you begin photographing workers or customer.

### 2. TYPES OF IMAGES

- 2.1. Photos must be taken in a courteous manner, giving due respect to the local communities, staff and customers.
- 2.2. The images must present subjects in a dignified manner and should not present them as vulnerable or victims.
- 2.3. People should be adequately clothed in photographs and not in poses that could be interpreted as sexually suggestive.
- 2.4. Paternalistic images should be avoided (ex. portraying the agency/donors as the 'providers')
- 2.5. Avoid using images of identifiable clients in clinics.

### 3. PHOTO USE

- 3.1. You will not use any pictures, images, or other likenesses of Stella's Child member and/or information related to them that could compromise their care and protection through any form of communication media (including all social media such as Facebook, Twitter, YouTube, etc.)
- 3.2. Remember: photographing and using photos of vulnerable populations requires extreme care and sensitivity. To protect the identity of individuals who may be put at risk of reprisal or rejection in their communities as a result of allowing their picture to be taken it is necessary to make sure they cannot be identified and leave out personal information such as names.
- 3.3. Images of children and adults should not be accompanied by information relating to their place of residence.
- 3.4. Photographs should be used in context and should be a true representation of events.
- 3.5. Images will not be used in public communications without the written approval of Stella's Child.

### 4. MEDIA

- 4.1. Media (including print, TV, video, documentary or other media) must act with particular sensitivity to ensure our staff, communities, customers and beneficiaries are not endangered.
- 4.2. No individual image (including photo or video) may be used in any identifiable form for the purpose of media.
- 4.3. Pictures of children in groups of more than three are permissible as long as they are not labelled, named or otherwise identified in any way.
- 4.4. Direction and permission for any media must be sought from and given by Stella's Child

## Appendix 2: Statutory Declaration of Criminal Record

### Statutory Declaration of Criminal Record

Applicant's Name:		Role applying for:	
Have you ever been charged or convicted of any offence?		Yes <input type="checkbox"/>	No <input type="checkbox"/>
If yes, please provide details:			

**Please note:** if you are applying for a position where you will have regular contact with children, (this may be frequent or in frequent), you are required to give details of **all convictions** or criminal offences and cautions, or pending prosecutions.

Have you ever been dismissed from employment or had any disciplinary action taken against you, which may be related to sexual exploitation, abuse, and harassment?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If yes, please provide details:		
Have you received any formal reprimands, final warnings, or cautions from the police?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If yes, please provide details:		
Is there any other information which may be relevant to your application e.g. pending prosecutions	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If yes, please provide details:		
Signature:	Date:	

---

### Appendix 3: PSEAH Policy Declaration

I confirm that I have read and understood Stella's Child Prevention of Sexual Exploitation, abuse and Harassment (PSEAH) policy. I agree to comply with this PSEAH policy.

I understand that a breach of the PSEAH may provide grounds for my appointment or association with the organisation to be terminated. I also understand that a breach of the PSEAH could result in criminal prosecution.

I understand that it is my responsibility, as a person associated with Stella's Child to use common sense and avoid actions or behaviours as defined in this policy as sexual exploitation, abuse or harassment of adults, children or young people, or could be construed as such.

I confirm my willingness to participate in available Stella's Child training sessions on Prevention of Sexual Exploitation, Abuse and Harassment.

**Name in block letters**..... **Job title** .....

**Signature** ..... **Date** .....

---

## Appendix 4: PSEAH Incident Reporting Sheet

### SEXUAL EXPLOITATION, ABUSE, AND HARRASEMENT PROTECTION INCIDENT REPORTING SHEET

Please fill out as many sections as possible with as much detail as you can. This form is confidential.

Location:
Your name:
Your position:
Victim's name:
Age/date of birth:
Victim's address (if known)/ nationality:
Date and time of incident:
Employee, program staff or Authorised representative involved in incident:
Place where incident occurred:
Your observations:
Details of Concern/ Suspicion/ Incident: Describe what happened: time, dates, names of person(s) involved, behaviour or physical signs observed, any other details:

Details of any conversation with the victim:	
Action taken so far:	
<b>Individuals/Agencies contacted (include date, time, and details below)</b>	
<b>Police Yes/No</b>	<b>Name and contact number:</b>
Details of advice received:	
<b>Social services Yes/No</b>	<b>Name and contact number:</b>
Details of advice received:	
<b>Stella's Child Management</b>	<b>Name and contact number:</b>
Details of advice received:	
<b>Other Local authority:</b>	<b>Name and contact number:</b>
Details of advice received:	
Signature:	
Print Name:	
Date:	

---

## Annex 1: PSEAH INVESTIGATION Report

Date	
Time	
Investigator	
Region/Country	
Responsible Area Manager	
Partner Organization	
Subject of Allegation (SOA)	
Reported By	
Internal Report System Reference ID number	
Subject of allegation contact record updated to indicate matter of concern	

### Incident Management Team.

Name	Role Title

### Incident and Allegations Description.

*Brief description of immediate actions (may include a meeting with the victim/survivor to provide support and gather further information and details.*

### Objectives.

In accordance with Stella's Child PSEAH or Safeguarding Policy and aligned with guidelines, the objectives of the investigation were to:

- *prioritise the needs of the survivor.*
- *ensure a zero-tolerance approach to all allegations of SEAH and act on every allegation in a fair and reasonable way.*
- *to establish and document the relevant facts, in order to make a finding based on the available evidence as to the whether the evidence substantiates the allegations made; and*
- *to provide recommendations on possible PSEAH control improvements.*

## Approach.

The approach undertaken by the investigator was as follows:

Date	Task	Location (in person, zoom, email etc)
	Initial allegation meeting with the victim/survivor. <b>(if applicable)</b>	
	Reviewed subject of allegation volunteering assignment and training records. <b>(if applicable)</b>	
	Victim/Survivor safeguarding welfare check. <b>(if applicable)</b>	
	Copy of the PSEAH notification incident report shared with Australian Volunteers Program In-Country team. <b>(if applicable)</b>	
	Contact made with the partner organisation of the subject of allegation for feedback regarding any concerns or complaints regarding SOA conduct. <b>(if applicable)</b>	
	Meeting(s) with any witnesses <b>(if applicable)</b>	
	Meeting with the subject of allegation <b>(if applicable)</b>	

## Assessment and Findings.

The incident was assessed as meeting our PSEAH/Safeguarding reporting obligations under SEAH as **(select one of the following: Exploitation/Abuse/Harassment)**.

Based on the disclosure and the information collated during the investigation, the findings are as follows:

### Recommendations

- *In consideration of the wishes of the victim/survivor (how were the victim/survivors wishes respected, considered and included in the recommendations?)*
- *The subject of allegation (what action is recommended)*
- *Consider if a refresh of PSEAH policy and procedures or PSEAH training could prevent additional incidents occurring in the future?*

As a result of this investigation, the following recommendation actions are completed and scheduled:

Recommendation	Person Responsible	Timeframe	Completed	Location	Resources

## Appendix 5: Safeguarding Risk Register (Year)

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Non-compliance with PSEAH policy: Staff	<i>Example: XXX Staff, contractors, volunteers etc may fail to comply with PSEAH policy and Code of Conduct.</i>	<i>Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High</i>	<i>Example: Staff, contractors, volunteers participate in online PSEAH training. Incident reports can be made discretely to multiple points of contact, to reduce the risk of a non-report due to conflicts of interest. Staff non-compliance is logged and responded to in the same manner as any other reports.</i>	<i>Example: All Staff regardless of employer receive training. Audit checks of training compliance are conducted. Procedures to manage non-compliance and non-reporting of incidents is in place.</i>	<i>Select either: Unsatisfactory/ Satisfactory/ Adequate</i>	<i>Select either: Very Low/ Low/ Moderate/ High/ Very High</i>		
Non-compliance with local PSEAH legislation:	<i>Example: XXX Staff, contractors, volunteers etc fail to comply with local PSEAH legislation in their country of residency/ employment or when travelling to another office location.</i>	<i>Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High</i>	<i>Example: Staff, contractors, volunteers participate in online PSEAH training. All Staff, contractors, volunteers have access to any finalised PSEAH risk management tools and information about local laws and legislation. PSEAH risk training is conducted before travel to another location occurs.</i>	<i>Example: Staff, contractors, volunteers receive training in induction, annual refresher and pre-travel briefing</i>	<i>Select either: Unsatisfactory/ Satisfactory/ Adequate</i>	<i>Select either: Very Low/ Low/ Moderate/ High/ Very High</i>		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
<p>Recruitment: Appointment of a staff, board member, volunteer or contractor that poses unacceptable SEAH risk</p>	<p><i>Example: XXX may appoint a staff, board member, volunteer or contractor who poses an unacceptable risk to people, may perpetuate a harmful culture, and who may threaten the reputation XXX</i></p>	<p><i>Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High</i></p>	<p><i>Example: All staff, board member, volunteer or contractor are comprehensively vetted via criminal record checks, reference checks and behavioural interviews questions</i> <i>Position descriptions note XXX commitment to safeguarding</i> <i>All staff, board member, volunteer or contractor are required to report misconduct, breach of PSEAH policy and any incidents of SEAH.</i> <i>All staff, board member, volunteer or contractors complete PSEAH training</i></p>	<p><i>Example: staff, board member, volunteer or contractor complete online PSEAH training.</i> <i>Audits of training completion are completed and confirm compliance.</i> <i>Audits and spot checks are conducted of compliance with PSEAH policy and procedures</i> <i>PSEAH procedures outline procedures, guidelines and includes templates.</i> <i>Staff information session occur regularly through training, sharing of newsletters sharing of materials, guidance documents are developed and socialised to support staff, board member, volunteer or contractor to identify, support and report SEAH allegations/incidents.</i> <i>SEAH obligations outlined in staff, board member, volunteer or contractor contracts, grant agreements and Code of Conduct which clearly indicates expected behaviours</i></p>	<p><i>Select either: Unsatisfactory/ Satisfactory/ Adequate</i></p>	<p><i>Select either: Very Low/ Low/ Moderate/ High/ Very High</i></p>		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Non-compliance with XXX PSEAH Policy: Volunteers	<i>Example: Volunteers may have contact with vulnerable adults as part of their role, while placed in-communities, or as part of their online engagement. In these instances, non-compliance with XXX PSEAH policy may lead to an incident of SEAH of vulnerable adults, whether intentional or not.</i>	<i>Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High</i>	<i>Example: All volunteers participate in PSEAH training. Incident reports can be made discretely to multiple points of contact, to reduce the risk of a non-report due to conflicts of interest. Volunteers' non-compliance is logged and responded to in the same manner as any other safeguarding incidents and health, safety and security reports.</i>	<i>Example: All volunteers receive online training. All volunteers attend training during which PSEAH is addressed and safeguarding elements. Expected safeguarding behaviours including PSEAH obligations are outlined in the volunteer code of conduct which is signed. All volunteers are expected to be compliant with the PSEAH obligations outlined in policy. All volunteers have access to XXX PSEAH policy</i>	<i>Select either: Unsatisfactory/ Satisfactory/ Adequate</i>	<i>Select either: Very Low/ Low/ Moderate/ High/ Very High</i>		
Non-compliance with local PSEAH legislation: volunteers	<i>Example: volunteers may fail to comply with local PSEAH legislation</i>	<i>Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High</i>	<i>Example: All volunteers participate in PSEAH training. Training include Risk and Security briefing and includes PSEAH and safeguarding risks with a local context.</i>	<i>Example: All volunteers receive training which includes PSEAH and safeguarding elements with a local context. PSEAH obligations are outlined in the volunteer code of conduct which they sign. All volunteers are expected to be compliant with the policy, code of conduct and reporting obligations. All volunteers have access to XXX PSEAH policy.</i>	<i>Select either: Unsatisfactory/ Satisfactory/ Adequate</i>	<i>Select either: Very Low/ Low/ Moderate/ High/ Very High</i>		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Deployment of a volunteer or contractor that poses unacceptable SEAH risk	<i>Example: A volunteer or who targets XXX as an opportunity to access and abuse vulnerable adults poses considerable risk to the reputation of XXX, and to the children in the communities that the XXX seeks supports or provides services.</i>	<i>Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High</i>	<i>Example: All prospective volunteers are comprehensively vetted via criminal record checks, reference checks, behavioural interview questions All volunteers participate in PSEAH training XXX retains the right to remove a volunteer from XXX if gross misconduct is identified or concerning behaviour are exhibited</i>	<i>Example: All volunteers receive training including PSEAH and safeguarding elements with a local context. Expected safeguarding behaviours including PSEAH obligations are outlined in the volunteer Code of conduct which they sign. All volunteers are expected to be compliant with the XXX PSEAH obligations outlined. All volunteers have access to XXX PSEAH policy.</i>	<i>Select either: Unsatisfactory/ Satisfactory/ Adequate</i>	<i>Select either: Very Low/ Low/ Moderate/ High/ Very High</i>		
Recruitment of a volunteer that poses an unacceptable SEAH risk	<i>Example: False personal information provided resulting in inappropriate volunteer deployed into XXX.</i>	<i>Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High</i>	<i>Example: Verification process includes manual check of documents by staff reference checking is completed.</i>	<i>Example: volunteers perform activities to quality standard. Strong and respectful relationships are developed with stakeholders</i>	<i>Select either: Unsatisfactory/ Satisfactory/ Adequate</i>	<i>Select either: Very Low/ Low/ Moderate/ High/ Very High</i>		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
SEAH impacts a staff member or volunteer as the survivor, whether by XXX Partner, community member or other staff or volunteer	<i>Example: Survivor not sufficiently/appropriately supported</i>	<i>Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High</i>	<i>Example: All staff and volunteers participate in PSEAH training. Incident reports can be made discretely to multiple points of contact, to reduce the risk of a non-report due to conflicts of interest. PSEAH information sessions and resources created and socialised. PSEAH posters are displayed in office locations.</i>	<i>Example: training sessions include local context risks and reporting. PSEAH risk documents outline local SEAH risks. Survivor supports such as access to health and law enforcement services are communi&amp;scated. Resources are developed and socialised to support staff to identify, support and report community SEAH allegations/incidents</i>	<i>Select either: Unsatisfactory/ Satisfactory/ Adequate</i>	<i>Select either: Very Low/ Low/ Moderate/ High/ Very High</i>		
SEAH within the community that impacts a staff member or volunteer as the survivor is not reported	<i>Example: Staff or volunteer may fail to report an incident of SEAH in the community.</i>	<i>Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High</i>	<i>Example: All staff and volunteers participate in PSEAH training. Incident reports can be made discretely to multiple points of contact, to reduce the risk of a non-report due to conflicts of interest. PSEAH information sessions and resources created and socialised. PSEAH posters are displayed in office locations.</i>	<i>Example: training include local context risks and reporting. information sessions and guidance developed and socialised to support staff to identify, support and report community SEAH allegations/incidents.</i>	<i>Select either: Unsatisfactory/ Satisfactory/ Adequate</i>	<i>Select either: Very Low/ Low/ Moderate/ High/ Very High</i>		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Engagement with a partner that poses unacceptable risks to vulnerable adults	<i>Example: Partnering with an organisation that is perpetuating abusive/unsafe practices, and indirectly supports these practices through volunteer placements</i>	<i>Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High</i>	<i>Example: partner due diligence checks are completed with all partners before partnership commences. Current requirements for partners to comply with PSEAH policy are included code of conduct, incident management and recruitment checks. compliance checks with prospective partners include specific PSEAH risk control questions.</i>	<i>Example: PSEAH elements discussed with partners during pre-partnership discussions. Contracts with partners include all partners must comply with XXX PSEAH policy. Partners sign XXX Code of Conduct or sign and agree with XXX PSEAH policy.</i>	<i>Select either: Unsatisfactory/ Satisfactory/ Adequate</i>	<i>Select either: Very Low/ Low/ Moderate/ High/ Very High</i>		
Non-compliance with local PSEAH legislation: Partner organisations	<i>Example: XXX partners may not comply with local SEAH legislation requirements</i>	<i>Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High</i>	<i>Example: XXX holds training with all new partners prior to commencing partnership and ensures refresher training is offered at least annually.</i>	<i>Example: All XXX partners are supported to develop their own PSEAH policy. XXX partners also sign XXX PSEAH policy and Code of Conduct. PSEAH elements discussed with XXX partners during pre-partnership compliance conversations.</i>	<i>Select either: Unsatisfactory/ Satisfactory/ Adequate</i>	<i>Select either: Very Low/ Low/ Moderate/ High/ Very High</i>		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Non-compliance with XXX PSEAH Policy or legislation: Partner organisation	<i>Example: XXX Partner staff may fail to comply with XXX PSEAH policy which poses a risk to XXX reputation and may lead to the XXX indirectly supporting abusive/unsafe/harmful practices</i>	<i>Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High</i>	<i>Example: PSEAH incident management investigation processes. XXX work with partners and support partners to develop their own PSEAH policy</i>	<i>Example: XXX partner compliance assessed during initial discussions and pre-partnership compliance reviews. XXX partner compliance risks are identified. Investigation processes include root cause analysis to identify increased and emerging risks within our partners. XXX reserves the right to pause or cease relation with partners if there is an unacceptable risk identified.</i>	<i>Select either: Unsatisfactory/ Satisfactory/ Adequate</i>	<i>Select either: Very Low/ Low/ Moderate/ High/ Very High</i>		
Non-compliance with XXX PSEAH Policy or legislation: Grant Recipients	<i>Example: Grant recipient staff may fail to comply with the XXX PSEAH policy and/or Code of Conduct, which poses a risk to XXX reputation and may lead to the XXX indirectly supporting abusive/unsafe/harmful practices</i>	<i>Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High</i>	<i>Example: PSEAH clauses and requirements are included in grant agreements. Reporting and acquittal processes are in place that review progress and expenditure. Grant agreements contain appropriate sanctions if XXX PSEAH policy is breached. Compliance processes in place for all grant recipients PSEAH incident management investigation processes.</i>	<i>Example: Completed grant recipient compliance check forms are on file. Appropriate agreement templates. Audits of grant recipient supporting documentation is completed. Grant recipient compliance checks update re-completed if risk is identified. Investigation processes include root cause analysis to identify increased and emerging risks within our partners.</i>	<i>Select either: Unsatisfactory/ Satisfactory/ Adequate</i>	<i>Select either: Very Low/ Low/ Moderate/ High/ Very High</i>		

				<p>XXX reserves the right to pause or cease relation with grant recipient if there is an unacceptable risk identified.</p>				
<p>XXX partner that provides residential care to vulnerable adults doesn't comply with XXX PSEAH Policy or local laws and legislation</p>	<p><i>Example: XXX partner may provide residential care to vulnerable people (thus raising SEAH risk profile) and fail to comply with the XXX PSEAH policy and/or Code of Conduct, which poses a risk to the XXX reputation and may lead to XXX indirectly supporting abusive/unsafe/harmful practices</i></p>	<p>Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High</p>	<p><i>Example: XXX partner compliance reviews are conducted and PSEAH issues are discussed All XXX partners are supported to develop their own PSEAH policy, attend training, sign XXX PSEAH policy and Code of Conduct.</i></p>	<p><i>Example: XXX partner compliance assessed during initial compliance review. compliance reviews update re-completed if risk is identified. Investigation processes include root cause analysis to identify increased and emerging risks within our partners. XXX reserves the right to pause or cease relation with partners if there is an unacceptable risk identified.</i></p>	<p>Select either: Unsatisfactory/ Satisfactory/ Adequate</p>	<p>Select either: Very Low/ Low/ Moderate/ High/ Very High</p>		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Emergence of activities/programs within XXX partner that pose unacceptable risks to vulnerable adults	<i>Example: when XXX start a partnership with a partner that is initially deemed compliant/safe, but the partner develops activities during the partnership that pose a risk to vulnerable adults.</i>	<i>Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High</i>	<i>Example: PSEAH incident management investigation processes. XXX partner compliance reviews are conducted and PSEAH issues are discussed. All XXX partners are reassessed against SEAH if a change in their business activities occurs.</i>	<i>Example: XXX partner compliance assessed during initial compliance review and reassessed regularly. Compliance updates re-completed if risk is identified. Investigation processes include root cause analysis to identify increased and emerging risks within our partners. XXX reserves the right to pause or cease relation with partners if there is an unacceptable risk identified.</i>	<i>Select either: Unsatisfactory/ Satisfactory/ Adequate</i>	<i>Select either: Very Low/ Low/ Moderate/ High/ Very High</i>		
Reporting: staff	<i>Example: Alleged SEAH incidents not reported within required timeframes resulting in breach of their employment contract.</i>	<i>Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High</i>	<i>Example: PSEAH training at orientation and annual refresher is completed for all staff Documented procedures for management of SEAH cases Clear procedures in place which include suspension and termination clauses for PSEAH policy reporting non-compliance.</i>	<i>Example: Staff receive training.</i>	<i>Select either: Unsatisfactory/ Satisfactory/ Adequate</i>	<i>Select either: Very Low/ Low/ Moderate/ High/ Very High</i>		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Reporting: volunteers	<i>Example: Alleged SEAH incidents not reported within required timeframes resulting in breach of contract</i>	<i>Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High</i>	<i>Example: PSEAH training at orientation and annual refresher is completed for volunteers Documented procedures for management of SEAH cases Clear procedures in place which include suspension and termination clauses for PSEAH policy reporting non-compliance.</i>	<i>Example: volunteers receive training.</i>	<i>Select either: Unsatisfactory/ Satisfactory/ Adequate</i>	<i>Select either: Very Low/ Low/ Moderate/ High/ Very High</i>		
Reporting: partner organisations, contractors and grant recipients	<i>Example: Alleged SEAH incidents not reported or are not reported within required timeframes resulting in a breach of contract</i>	<i>Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High</i>	<i>Example: PSEAH clauses and requirements are included in grant agreements and contractor contracts. All XXX partners are supported to develop their own PSEAH policy. XXX partners are required to sign XXX PSEAH Policy and Code of Conduct. Reporting and acquittal processes are in place that review progress and expenditure for grant recipients. Grant agreements, contractor contracts and partnership agreements contain appropriate sanctions if XXX PSEAH policy is breached. PSEAH incident management investigation processes.</i>	<i>Example: Engagement with partners (partners, contractors and grant recipients) include compliance review where PSEAH risk management and reporting requirements are discussed.</i>	<i>Select either: Unsatisfactory/ Satisfactory/ Adequate</i>	<i>Select either: Very Low/ Low/ Moderate/ High/ Very High</i>		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Cyber-security	<p>Example: Online harassment towards or perpetrated by a staff member, volunteer, partner organisation, contractor or grant recipient</p>	<p>Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High</p>	<p>Example: Reviews of IT systems are completed. Online content is monitored by XXX team.</p>	<p>Example: Staff, volunteers, contractors, grant recipients and partners receive training which includes issues regarding online harassment, images and videos, consent and are encouraged to report if issues are observed. PSEAH policy, online training, handbook and Code of Conduct all contain safe online messaging.</p>	<p>Select either: Unsatisfactory/ Satisfactory/ Adequate</p>	<p>Select either: Very Low/ Low/ Moderate/ High/ Very High</p>		

Table 1 Risk level

Based on the ratings of likelihood and consequence assigned to a risk, an inherent risk level is assigned to a risk according to Table 3 below. Mitigating control factors are then identified and recorded in the risk register to determine the residual risk level for each risk.

		Consequences				
		Insignificant	Minor	Moderate	Major	Severe
Likelihood	Almost Certain	Medium	Medium	High	Very High	Very High
	Likely	Low	Medium	Medium	High	Very High
	Possible	Low	Low	Medium	High	High
	Unlikely	Very Low	Low	Low	Medium	High
	Rare	Very Low	Very Low	Low	Medium	High

Table 4 Residual risk levels and treatment approaches

Risk Level	Treatment Approaches
Very High – Extreme Risk (Avoid)	Implement immediate and extreme measures. Immediate action by Senior Management via implementation of a detailed treatment plan and close monitoring on a regular basis (e.g., daily / weekly). Escalate to Board.
High Risk (Control / Avoid)	Manage via implementation of a detailed treatment plan and close monitoring on a regular basis (e.g., monthly). Escalate to the next level of senior management.
Moderate Risk (Control and Transfer)	Enhance current measures and consider alternatives. Management to agree and apply possible treatment strategies and to monitor the risk at least on a quarterly basis.
Low Risk (Control)	Manage through normal monitoring and control procedures. Management to monitor the risk at least bi-annually.
Very Low (Managed by Routine Procedures)	Manage through routine monitoring and control procedures; unlikely to need specific application of resources.

Table 5 Control measures

Control Measure	Definition
Unsatisfactory	Action required – Further controls needed / refinement to current controls required
Satisfactory	Acceptable – but current controls could be enhanced
Adequate	Acceptable – monitor and review