Risk Management (DFAT Business Activities) Guidelines

Section 1 - Purpose and Scope

Purpose

(1) These Guidelines support:

a. the effective management of the risk of sexual exploitation, abuse and harassment in the delivery of University's business where the [Department of Foreign Affairs and Trade](#) (DFAT) is the partner organisation or funding body;

b. compliance with the [DFAT Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy](#).

Scope

(2) These Guidelines apply to all University staff involved in any aspect of delivering DFAT business.

Section 2 - Definitions

(3) DFAT – Department of Foreign Affairs and Trade

(4) SEAH – sexual exploitation, abuse and harassment

(5) PSEAH – prevention of sexual exploitation, abuse and harassment

Section 3 - Position Statement

(6) The University does not tolerate any form of exploitation, abuse, harassment or inappropriate behaviours and is committed to prevention through ongoing risk management practices.

(7) The University, as a DFAT partner, implements and complies with the [DFAT PSEAH Policy](#), (commensurate with the level of risk) by identifying, evaluating, treating and monitoring risks and reporting incidents or concerns to DFAT, as required.

(8) The University program/project lead is responsible for undertaking, documenting and monitoring risk assessments and reporting issues of concern.

Section 4 - Business Processes

Step 1: Confirm that a business activity is a DFAT business activity

(9) DFAT business activities may be funded or unfunded and are supported by appropriate agreements between the University and DFAT.

(10) The University's DFAT business activities include those connected with:

    a. New Colombo Plan Mobility and Scholarship Programs;

    b. Australia Award Scholarship Program;

    c. DFAT-funded research grants; and

    d. DFAT-funded student programs.

Step 2: Identify risk of sexual exploitation, abuse and harassment (SEAH) in the delivery of DFAT business

(11) The risk of SEAH should be considered as part of the University's existing risk management practices.

(12) A risk assessment should be performed prior to entering into an agreement with DFAT that explicitly considers the risk of SEAH.

(13) Appropriate clauses relating to DFAT PSEAH compliance should be captured in formal agreements between the University and its downstream partners (for example, exchange program hosts).

(14) Records must be maintained of how those downstream partners will manage SEAH risk. Risk plans, assessments and details of existing controls and reporting requirements should be kept up to date and reviewed as required.

(15) Identifying a SEAH risk should be done in consultation with key stakeholders such as:

    a. Southern Cross Global;

    b. Program/project participants;

    c. [Workplace Health and Safety](#);

    d. Student Care and Support; and

    e. Third parties, such as exchange program hosts and host institutions.

Step 3: Analyse and evaluate the SEAH risk

(16) To establish the likelihood and consequence of the risk of SEAH occurring, a comprehensive assessment should be conducted in accordance with the [DFAT PSEAH Risk Guidance Note](#). This includes:

    a. Assessing the factors which heighten the likelihood of SEAH such as gender, age, disability, language, displacement, power differential, sexual preference, education, alcohol, health and poverty.

    b. Measuring the likelihood (low, medium, high or very high) of a SEAH risk by evaluating the business activity along with organisational and reputational risks and how they may intersect.

Step 4: Treat the level of risk

(17) After determining the level of risk the DFAT minimum standards are to be applied.

    a. Low: Minimum standards 1 - 2

    b. Medium: Minimum standards 1 - 3

    c. High: Minimum standards 1 - 5

    d. Very High: Minimum standards 1 - 7

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Standard	DFAT MINIMUM REQUIREMENTS
1	Have a PSEAH policy or other documented policies and procedures in place and clearly communicate expectations of this Policy
2	Have reporting and investigation procedures in place
3	Have risk management processes that include the risk of SEAH
4	Effective PSEAH training in place
5	Recruitment and screening processes and employment practices address and manage the risk of SEAH
6	Prohibit transactional sex for all personnel, while engaged in the direct delivery of DFAT business
7	Prohibit fraternisation for all non-national personnel, while engaged in the direct delivery of DFAT business

(18) Appropriate options for treating or modifying risk should be selected and documented in a Risk Management Plan.

Step 5: Monitor the risk of sexual exploitation, abuse and harassment

(19) The University's DFAT activities are to be regularly monitored and reviewed, taking into account:

a. the level of the risk of SEAH may increase or new risks emerge;
b. significant changes to the context, environment or other risk factors may arise.

(20) Where required, the University will act upon changed circumstances and update Risk Management Plans accordingly.

Record Keeping

(21) All documentation, such as risk assessments, risk management plans and reports are to be maintained in accordance with the University's Records Management Policy and Records Management Procedures.

Section 5 - Reporting Requirements

(22) All reports of sexual exploitation, abuse and harassment or concerns about the welfare of a vulnerable person must be reported via the usual University reporting lines using RiskWare.

(23) Where these concerns relate to DFAT activities, the University will report to DFAT, using their Incident Notification Form:

a. Any alleged incident of sexual exploitation, abuse or harassment related to the delivery of DFAT business within two days of becoming aware of an alleged incident.
b. Any incident of alleged non-compliance with DFAT PSEAH Policy (such as failure to adhere to minimum standards) within five business days of becoming aware of alleged non-compliance.

Section 6 - Associated Documents

(24) These Guidelines should be read in conjunction with:

a. DFAT Preventing Sexual Exploitation, Abuse and Harassment Policy
b. DFAT Preventing Sexual Exploitation, Abuse and Harassment Guidance Note

c. [Harassment, Bullying and Discrimination Prevention Policy](#)
  d. [Code of Conduct](#)
  e. [Work Health Safety Policy](#) and [Procedures](#)
  f. [Records Management Policy](#) and [Procedures](#)

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