

<h2>AVI Preventing Sexual Exploitation, Abuse & Harassment Policy</h2>	Effective date	Aug 2022
	Next review date	Aug 2024
	Sponsor	People & Culture Manager
	Board committee	People & Culture
Level / Class	Approval / authorisation	Board
Organisation		

1. PURPOSE

AVI is committed to safeguarding the people it helps and who it works alongside. We recognise that the nature of AVI's work places our workers and program participants in positions of authority and trust in relation to the communities we work with, especially vulnerable adults and children. AVI workers and program participants have an obligation to uphold high standards of personal and professional conduct at all times and must not abuse this position in order to exploit or abuse another person.

Fundamental to the operation of AVI is respect for the dignity and basic human rights of all people. Every person who represents AVI is expected to reflect these values in their professional conduct, regardless of who they are dealing with, or where they are working.

Sexual exploitation, abuse, and sexual harassment (SEAH) are violations of basic human rights. AVI aims to provide a safe and trusted environment that safeguards everyone from SEAH including beneficiary communities, workers, program participants and partner organisations.

AVI will actively prevent and respond to SEAH and advance an organisational culture that prioritises safeguarding against SEAH so that it is safe for those affected to come forward and report incidents and concerns with the assurance they will be handled sensitively and appropriately.

2. SCOPE / PERSONS AFFECTED

The following must comply with this Policy in the course of their work and when representing AVI:

- AVI workers, Board members and personnel
- All program participants (including AAD's)
- All other parties, including Partner Organisations, as specified and required by DFAT and other donors

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

Appropriate consultation

3. PRINCIPLES

AVI's commitment to the prevention of sexual exploitation and abuse (PSEAH) is informed by the following principles:

- **Child rights and gender equality as core values within AVI:** AVI upholds the rights articulated in the International Bill of Human Rights, The UN Convention on the Elimination of all Forms of Discrimination Against Women and The UN Convention on the Rights of the Child and promotes the right of adults and children to be protected from all forms of violence including SEAH.
- **Safeguarding vulnerable adults and children:** Issues of SEAH are fundamentally about abuses of power. Situations of poverty, vulnerability and discrimination as well as power inequities between genders, between aid workers/volunteers and beneficiary communities, and within organisations, create unequal power dynamics resulting in environments where SEAH can exist. AVI acknowledges the impact of SEAH on an individual's health and wellbeing, and that negative physical, mental health and social outcomes are likely to be compounded when perpetrated by a person in authority.
- **Shared responsibility:** PSEAH is a shared responsibility by all AVI personnel. AVI expects commitment and support from all its personnel to PSEAH, as this is everyone's responsibility.
- **Strong leadership:** AVI expects those in leadership roles to set clear expectations and model respectful behaviour in their interactions at work and in public and to take measures to improve diversity and inclusion in line with AVI Policy.
- **Victim/survivor needs are prioritised:** AVI is committed to ensuring procedural fairness to all parties involved and ensuring a survivor's rights are respected. Our work is underpinned by a 'do no harm' approach and we recognise the vulnerabilities and needs of those who may be victims/survivors of SEAH. Towards this our approach aims to:
 - Treat the victim/survivor with dignity and respect
 - Actively involve the victim/survivor in decision making
 - Provide the victim/survivor with comprehensive information
 - Protect privacy and confidentiality
 - Not discriminate based on race, ethnicity, gender, sexual orientation, socio-economic status, age, physical abilities, religious beliefs, political beliefs, or other ideologies and
 - Consider the need for counselling and health services to assist the victim/survivor with their recovery.
- **Gender inequality and other power imbalances are addressed:** AVI particularly recognises that gender, disability, age, sexual orientation and poverty have powerful intersection points with the likelihood of SEAH. AVI actions promote gender equality, child protection & safeguarding, social inclusion and accountability towards a 'do no harm' approach.
- **Expected behaviours of those representing AVI:** Given differing local contexts, AVI workers and program participants may be faced with a range of unfamiliar social, cultural, financial or personal settings when working or volunteering overseas. Communities trust that the people representing AVI will always conduct themselves in a professional manner and not engage in behaviour contrary to the safety or wellbeing of the children and adults they come into contact with.
- **Zero tolerance of SEAH and inaction:** Behaviour by AVI workers or program participants that results in the sexual exploitation or abuse of a child or adult, helps facilitate SEAH or where allegations of SEAH are ignored by AVI or partner organisation personnel, will not be tolerated and AVI will immediately respond and take seriously any concerns raised.
- **Take action to prevent SEAH:** AVI aims to prevent SEAH through implementation of this Policy, communication, training and working collaboratively with all AVI workers and partner organisations to safeguard everyone against SEAH.

4. POLICY

The following list of expected behaviours applies to all of AVI workers and AVI program participants, in both their personal and professional lives. The aforementioned must, at all times:

- Maintain a duty to act in a manner which upholds the values and reputation of AVI
- 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 Australian and local laws of the country to which he or she is placed, 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 AVI any concern, suspicion or allegation of SEAH or any alleged policy non-compliance. Reporting procedures are outlined in section 5.6 below.

In addition, AVI workers must adhere to the following expected behaviours:

- AVI workers must not engage in sexual relationships with program participants, or AVI program 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 AVI and its programs.
- Workers must immediately inform their direct manager if they become engaged in a personal relationship which may be perceived as inappropriate or exploitative, or where real or perceived unequal power dynamics exist. **Workers who are unsure if their relationships fall into this category should discuss the situation with their line manager and/or a member of the People and Culture team.**

Program participants must adhere to the following expected behaviours:

- Program participants should exercise caution when engaging in sexual relationships with AVI program beneficiaries or other adult community members as these relationships may be based on inherently unequal power dynamics and there is the potential for abuse of power. As such, program participants should be mindful of the unique challenges and perceptions associated with such relationships and are encouraged to seek counsel from an AVI Program Manager or Regional Director before entering into a relationship of this nature.

- Program participants must immediately inform their Program Manager or Regional Director if they become engaged in a personal relationship which may be perceived as inappropriate or exploitative, or where real or perceived unequal power dynamics exist. **Participants and dependents who are unsure if their relationship falls into this category should discuss the situation with their Program Manager or Regional Director.**
- Australian Volunteer Program participants must also adhere to the requirements outlined in the Volunteer Code of Conduct which is signed prior to commencing an assignment.

It is strictly prohibited for AVI workers, program participants and AVP approved adult dependents to:

- 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 AVI programs, adults, children or others in the communities in which AVI 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 AVI programs - adults, children or others in the communities in which AVI works - money, food, employment, goods, assistance or services for sex or sexual favours or other forms of humiliating, degrading or exploitative behaviour.
- Have sex with sex workers when working or volunteering overseas, even when it is legal in the country.
- Use AVI or partner organisation facilities, personnel or resources for the purpose of arranging or facilitating access to sex workers by any person, including visitors to AVI 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, AVI workers, program participants and AVP approved adult dependents 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.**

5. DEFINITIONS

Worker: employees (Australia and overseas), consultants, contractors, office volunteers, interns, the AVI Board, visitors, or anyone engaged to undertake work for AVI.

Program Participant: defined as any person engaged to undertake an assignment, volunteer or otherwise, on an international or domestic program managed by AVI. This includes those who are engaged remotely.

Accompanying adult dependent (AAD): defined as any person over the age of 18 supported by AVI to accompany a person undertaking an assignment, volunteer or otherwise, on an international or domestic program managed by AVI.

Partner Organisations: any organisation either in Australia or overseas that receives a benefit from an AVI program and where volunteers and program participants are mobilised, including remotely

Program beneficiaries: any person who, either directly or by association, derives a benefit from an AVI or AVI affiliated program. Examples include but are not limited to; Partner Organisation

employees and community members who directly receive a service or engage with a program participant in the course of the participant's work with a Partner Organisation.

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, socially or politically from the sexual exploitation of another.¹

Sexual Abuse - the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

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 AVI's programs, program participants, community members, citizens, as well as employees and workers.

Child Sexual Abuse - the use of a child for sexual gratification by an adult or significantly older child or adolescent. Sexually abusive behaviours can include fondling genitals; masturbation; oral sex; vaginal or anal penetration by a penis, finger or any other object; fondling breasts; voyeurism; exhibitionism; and exposing the child to, or involving the child in, pornography (see AVI Child Protection Policy).

Child Exploitation - one or more of the following:

- Committing or coercing another person to commit an act or acts of abuse against a child

¹ The definitions for both Sexual Exploitation and Sexual Abuse are contained in the United Nations Secretary-General's Bulletin, "Special measures for protection from sexual exploitation and sexual abuse" ST/SGB/2003/13 (9 October 2003) [hereinafter Secretary-General's Bulletin on SEA (2003)]. 

- 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 advantage²

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. ^[1]_{SEP}

Survivor - A person who has SEAH perpetrated against him/her/them or an attempt to perpetrate SEA against him/her/them.

5.1 Breach of Policy

Sexual exploitation, abuse and harassment by AVI workers, program participants constitute acts of gross misconduct and are therefore grounds for termination of employment or volunteer assignment.

Disciplinary actions/possible outcomes for breach of the AVI PSEAH Policy can include:

- Referral to local law enforcement authorities (as per national and any mandatory reporting laws), where appropriate
- Referral to Australian Federal Police, where appropriate
- AVI 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
- Where substantiated, termination of employment for workers or termination of assignment for program participants.

5.2 Shared responsibilities to prevent and respond to SEAH

All AVI 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 AVI workers and program participants understand policy obligations.

Managers and leaders must create a safe environment at AVI for anyone to come forward and raise allegations or concerns of SEAH and immediately respond to any reports. This will be done by:

² DFAT Child Protection Policy 2017

- 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

5.3 PSEAH Training

PSEAH training will be provided for AVI staff, Board Directors, and program participants and any other training as required by DFAT or other funders.

AVI workers and AVI program participants are provided training related to social media use as outlined in the Communications and Fundraising Policy and relevant Code of Conduct.

5.4 Recruitment

AVI will apply robust recruitment and screening procedures for all AVI workers, program participants and AVP approved adult dependents to reduce the risk of engaging a person who poses an unacceptable risk to children or adults, particularly vulnerable children and adults. These procedures include:

- Criminal history checks
- Referee checks from an applicant's last place of employment/volunteer/program placement including when working in overseas locations and will include a question regarding any concerns of sexual misconduct.
- Personnel records to include performance or conduct issues regarding concerns or allegations of SEAH.
All employment/assignment contracts must contain provisions for potential disciplinary action including termination of employment/assignment following breach of this policy.

5.5 AVI's Risk Management Process

AVI will design and implement effective risk management processes that include consideration of the risk of SEAH. The process will document the controls in place or to be implemented to reduce or remove the risks of SEAH.

5.6 Reporting & Investigation

5.6.1 How to Report

AVI provides a safe, supportive and secure environment to report alleged incidences of SEAH or policy non-compliance. AVI will take all concerns seriously and respond immediately and in accordance with AVIs and DFAT reporting requirements, and subject to the wishes and welfare of the survivor. All reports of SEAH will be recorded through Risk Wizard, regardless of whether substantiated or full investigation required and AVI will de-identify complaints at the request of the survivor. The principles of natural justice will apply to all investigations.

AVI workers, program participants and must immediately report any concerns, suspicions or allegations of SEAH or alleged breach of the AVI PSEAH Policy. A report should be made to one of the following people as applicable:

Program participants may report a concern regarding sexual exploitation, abuse and harassment or Policy breach to any of the following people:

- The relevant Regional Director or Program Manager: if comfortable doing so, and if the Director/Manager is not directly or indirectly implicated in the alleged report
- AVI Risk and Security Staff
- AVI Child Protection and Safeguarding Staff
- AVI Executive Manager International Services
- CEO
- Stoptline – AVIs third party Whistleblowing service

AVI Workers may report a concern regarding sexual exploitation abuse and harassment or Policy breach to any of the following people:

- Their manager: if the worker feels comfortable doing so, and if their manager is not directly or indirectly implicated in the alleged report
- The CEO
- A member of the People and Culture team
- A member of the AVI Organisational Leadership Team (OLT)
- Member(s) of the AVI Board
- Stoptline – AVIs third party Whistleblowing service

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

- AVI's Complaint Handling procedures
- Stoptline – AVI's third party Whistleblowing service

Children and young people may also report a concern regarding sexual exploitation, abuse and harassment to AVI Child Protection and Safeguarding staff or any AVI staff member who will in turn report disclosures in line with AVIs reporting procedures.

- AVI will provide information about this Policy and the reporting mechanisms in child friendly language and ensure it is easily accessible

5.6.2 Managing Reports

Anyone wishing to make a report anonymously which would be protected by the Whistleblowers Protection Act 2001 needs to refer to the AVI Whistleblower Protection Policy for information on protected disclosures and can make a report by accessing Stoptline or as specified in the Policy.

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 AVI Board members.

5.6.3 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. For any SEA incidents involving children, the best interest of children will prevail.

5.6.4 Investigations

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.

Sensitive information related to reports of SEAH whether involving AVI workers, program participants, accompanying adult dependents or others in the communities in which AVI works shall be shared only with Australian or local law enforcement authorities, when a notification to police or appropriate authorities must be made or on a 'need to know' basis. Information of alleged perpetrators that may be provided to law enforcement authorities and/or to DFAT will be handled in accordance with the Privacy Act 1988 and any and all privacy legislation and principles that may apply.

5.6.3 Survivor support and assistance

AVI will adopt a survivor-centred approach in preventing and responding to SEAH. AVI 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 survivor³.

AVI 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.

Children have the right to participate in decisions that will affect them. If a decision is taken on behalf of a child, the best interests of the child shall be the overriding guide. Referrals should be done in consultation with child focused agencies specialising in the special needs of child survivors of sexual abuse, and who are familiar with local procedures relating to the protection of children.⁴

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

5.7 Partner Organisations

AVI will work with Partner Organisations in the prevention of SEAH and Partner Organisations will be advised of avenues available to report concerns regarding SEAH.

³ IASC Statement on PSEA (2015)

⁴ Global Standard Operating Procedures on Inter-Agency Cooperation in CBCMs (2016)

6. RESPONSIBILITIES

- Summarise the roles and responsibilities of all individuals involved with this policy or procedure

PSEAH Focal Point:	Ensuring AVI meets its obligations under the PSEAH Policy; receiving and investigating reports; ensuring policy accessibility and training. AVI's PSEAH Focal Point is its People & Culture Manager
CEO	Ensuring the PSEAH Policy is upheld; guiding the governance and culture of AVI's commitment to PSEAH through strategic leadership
Board	Approve PSEAH Policy; hold AVI leadership accountable to how effectively the policy is being implemented
AVI Leadership	Leading by example; ensuring teams are aware of the policy and understand their responsibilities
Regional Directors	Communicating the policy and procedures to workers; engaging workers to ensure the policy principles and expectations are understood and embraced; input for reports/investigations
Global Risk and Security Team	Monitor PSEAH & safeguarding risks and identify appropriate mitigation strategies
CP&S Advisor	Provision of advice and coordination of child notifications; advice for policy implementation and support for training and policy awareness
Compliance and Assurance Manager	Provision of advice and coordination of PSEAH notifications; advice for policy implementation and support for training and policy awareness
Workers	Understand and follow AVI's PSEAH Policy; ensure that work is in line with policy principles and commitments, advance a culture of support and acceptance of the policy, report incidents and concerns to AVI

7. RELATED POLICIES

- [AVI Code of Conduct](#)
- [AVI Complaint Handling Policy](#)
- AVP Australian Volunteer Code of Conduct
- [AVP Volunteer Guidebook](#)
- [Bullying, Harassment and Anti-Discrimination Policy](#)
- [Child Protection Policy](#)
- [Child Protection Code of Conduct](#)
- [Probity Check Policy](#)
- Australian Volunteer Program Operations Manual
- [Whistleblower Policy](#)

8. RELEVANT EXTERNAL POLICIES, LAWS AND INTERNATIONAL CONVENTIONS

- ACFID Code of Conduct
- DFAT Child Protection Policy 2017
- DFAT PSEAH Policy
- International Bill of Human Rights
- Privacy Act 1988
- The UN Convention on the Elimination of all Forms of Discrimination Against Women
- The UN Convention on the Rights of the Child
- UNSC Resolution 1325: Women, peace and security (WPS)
- SDG 5: Achieve gender equality and empower all women and girls
- Commonwealth Criminal Code Act 1995 - It is a crime for Australian citizens, permanent residents or bodies corporate to engage in, facilitate or benefit from sexual activity with children (under 16 years of age) while overseas. These offences carry penalties of up to 25 years imprisonment for individuals and up to \$500,000 in fines for companies (extraterritorial legislation).

9. REFERENCES

- Terminology Guidelines for the Protection of Children from Sexual Exploitation and Sexual Abuse – Adopted by the Interagency Working Group in Luxembourg, 28 January 2016
<http://cf.cdn.unwto.org/sites/all/files/docpdf/terminologyguidelines.pdf>
- IASC Six Core Principles Relating to Sexual Exploitation and Abuse⁵
<https://reliefweb.int/report/world/protection-sexual-exploitation-and-abuse-psea-interagency-cooperation-community-based>
- DFAT Code of Conduct for Overseas Staff
<https://www.dfat.gov.au/aboutus/publications/Pages/dfat-code-of-conduct-for-overseas-service.aspx>

10. EVALUATION AND PERFORMANCE MEASUREMENT

AVI will monitor compliance through a range of approaches including performance assessments, risk management mechanisms, and due diligence checks.

This policy will be reviewed and, where appropriate, updated, at least once every two years.

11. REVISION HISTORY

Date	Revision Number	Change(s)	Reference Section(s)
Aug 2018	1	New policy	
Sep 2019	2	<ul style="list-style-type: none"> • Inclusion of Harassment in the Policy 	

⁵ See Report of the Inter-Agency Standing Committee Task Force on Protection from Sexual Exploitation and Abuse in Humanitarian Crises of 13 June 2002, Plan of Action, Section I.A.

		<ul style="list-style-type: none"> • Reference to Partner Organisations • Amendments to disciplinary actions in line with procedural fairness • Inclusion of reference to PSEAH training and risk management process • Amendments to Reporting and Investigation principles as it relates to children and visitors, beneficiaries and members of the public • Reference to the Privacy Act as required by DFAT 	
Apr 2020	3	<ul style="list-style-type: none"> • Update to definition of sexual harassment • Update to 6.5.1 • Updates to references from Whispli to Stopline • Update to reporting and training requirements 	
June 2022	4	Revision throughout	