



# Safeguarding Policy

SEPTEMBER 2021, VERSION 1.1

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## Introduction

Palmera values the safety and protection of community members and children in the communities in which we operate, both in Australia and overseas.

We recognise that our work brings us into contact with adults who may be in positions of vulnerability, and to whom we owe protection obligations. This includes:

- women and people with disabilities who are marginalised and excluded due to gendered social norms, negative stereotypes and stigmatisation of disability, inequitable laws and policies and lack of access to basic resources, services and infrastructure;
- we may also come into contact with, or impact, children as indirect beneficiaries of Palmera's projects (simply by their relationship to direct beneficiaries). Palmera may also undertake youth programs from time to time directly targeted towards child beneficiaries who are severely affected by a lack of access to education, lack of engagement in meaningful activities and a limited sense of belonging or contribution to their community; and
- in our organisational operations in Australia, children and adults who interact with Palmera.

This Policy sets out the mandatory expectations and requirements of Palmera and its Partners aimed at ensuring the safety of children and adults and preventing child abuse or exploitation (**CAE**) and sexual exploitation, abuse or harassment (**SEAH**) in Palmera's work, both in Australia and in countries where Palmera Activities are undertaken. It also sets out the systems and processes to be put in place to ensure that the risk of CAE and SEAH incidents is reduced in connection with the implementation of any Palmera Activity.

Palmera's **Organisational Policy** deals with harassment within the workplace, between members of Palmera Staff. Notwithstanding this, however, this Policy recognises the importance of embedding child protection and SEAH prevention values at an organisational level.

In all its work, Palmera takes a **zero-tolerance** approach to all forms of CAE and all forms of SEAH towards adults or community members.

## Definitions and Terms<sup>1</sup>

Term	Definition
<b>CAE</b>	Any form of Physical abuse, Sexual abuse, Sexual harassment, Sexual exploitation, Emotional abuse or Neglect towards a child.
<b>Donor Field Visit</b>	Any physical visit to the site of a Palmera Activity by a member of Palmera Staff or Palmera Supporter outside of delivery of a Palmera Activity.
<b>Emotional abuse</b>	Emotional abuse occurs when inappropriate verbal or symbolic acts are carried out towards a child, or where there is a pattern of failure over time to provide a child with adequate non-physical nurture and emotional support. Such acts are likely to damage a child's self-esteem or social competence and include ridiculing, intimidating, threatening or isolating the child.
<b>Neglect</b>	Neglect is the intentional withholding from a child the basic necessities of life, such as clothing, shelter and supervision to the extent that the child's health and development are at risk.
<b>Palmera Activity</b>	Any proposed or actual programme or project to which Palmera contributes funds.
<b>Palmera Partner</b>	Any implementing partner organisation engaged by Palmera in the delivery of a Palmera Activity.
<b>Palmera Staff</b>	All employees, volunteers, contractors, consultants, officers and directors of Palmera.
<b>Palmera Supporter</b>	Any donor or supporter of Palmera who will participating in a Donor Field Visit.
<b>Partner Staff</b>	All employees, volunteers, contractors, consultants, officers and directors of a Palmera Partner.
<b>Physical abuse</b>	Physical abuse occurs when a person uses or threatens to use physical force against a child or adult that results in harm to that child or adult. Physical abuse includes shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning.
<b>SEAH</b>	Any form of Physical abuse, Sexual abuse, Sexual harassment or Sexual exploitation towards a community member or other adult not considered to be CAE.
<b>Sexual abuse</b>	The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual offences including but not limited to: rape and attempted rape (which includes attempts to force

<sup>1</sup> Certain defined terms are taken from Australian Government Department of Foreign Affairs and Trade, Prevention of Sexual Exploitation, Abuse and Harassment Policy, 2019.

someone to perform oral sex); and sexual assault (which includes non-consensual kissing and touching). All sexual activity with someone under the age of consent (in the law of the host country or under Australian Capital Territory law [16 years], whichever is greater) is considered to be sexual abuse.

**Sexual exploitation** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from sexual exploitation of another.

**Sexual harassment** A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favours, or engages in other unwelcome conduct of a sexual nature, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.

Sexual harassment can take various forms. It can be obvious or indirect, physical or verbal, repeated or one-off and perpetrated by any person of any gender towards any person of any gender. Sexual harassment can be perpetrated against beneficiaries, community members, citizens, as well as staff and personnel.

## Status of Policy

This Safeguarding Policy (this **Policy**) consolidates and replaces previous versions of Palmera’s policies on:

- Child Protection; and
- Prevention of Sexual Exploitation, Abuse and Harassment

(each a **Prior Policy**).

Any reference to a Prior Policy in any document, policy, guidance of Palmera or any agreement entered into by Palmera (including agreements with Palmera Partners) will be taken as a reference to this Policy.

## Scope of Policy

This Policy applies to all of Palmera’s work within the organisation and in the Palmera Activities it undertakes with Palmera Partners.

## Policy

### A. Our commitment

In all our work, Palmera is committed to:

1. the safety and wellbeing of children;
2. protecting both children and community members from abuse and exploitation; and
3. promoting a culture where people are treated with dignity and respect.

Palmera achieves this by adhering to our guiding principles that seek to uphold child protection and SEAH values (section B, below), and in the safeguarding approach and mechanisms that we have developed to implement those values in our work (section C, below).

If any member of Palmera Staff or Partner Staff acts in a way that is sexually exploitative or abusive towards an adult or a child, or is in any way considered to be CAE or SEAH, Palmera will take immediate steps to protect and support those affected, and to impose disciplinary action as set out in this Policy.

## B. Our Guiding Principles

The safety and wellbeing of children and community members in the communities in which we work is critical to ensuring Palmera can advance its vision for a world in which no one is left out. To achieve this, Palmera is guided by the following safeguarding principles which govern our activities and decision-making:

### 1. WE HAVE A ZERO-TOLERANCE APPROACH

- Palmera adopts a zero-tolerance approach to CAE or SEAH in any form.
- Palmera will not knowingly engage (either directly or indirectly) with any person that poses a risk to children or the community members with which we work.
- Palmera will take active steps to minimise the risk of SEAH and CAE occurring and ensure that Palmera Staff and Palmera Partners are aware of their obligations under this Policy.
- Palmera Staff and Palmera Partners have a strict obligation to take all possible steps to strengthen protection against CAE and SEAH, prevent sexual exploitation and abuse and promote the rights of the community members (including children) with whom we work.

### 2. WE TAKE RESPONSIBILITY FOR THE PROTECTION AND PREVENTION OF CAE AND SEAH

- The responsibility for ensuring risks to children and communities are mitigated, lies with Palmera and its Partners.
- This involves a collective approach throughout our organisation and those organisations we partner with to ensure the commitments, principles and standards reflected in this Policy are embodied and implemented across the board.

### 3. WE PRIORITISE THE BEST INTERESTS OF THE CHILD WHEN DEALING WITH CAE INCIDENTS

- Palmera will embody the principles enunciated in the UN Convention on the Rights of the Child (1989), namely that in all child safety incidents Palmera addresses, the best interests of the child shall be the primary consideration.

### 4. WE TAKE A SURVIVOR-CENTRED APPROACH TO INCIDENTS OF SEAH

- Palmera will prioritise the rights, needs and wishes of the victim / survivor with respect to any incidents of SEAH in its work.
- This approach treats the victim / survivor with dignity and respect by involving the victim / survivor in the decision-making process and providing them with comprehensive information regarding Palmera's handling of the incident.

## 5. WE AFFORD PROCEDURAL FAIRNESS AND NATURAL JUSTICE

- Palmera will ensure that procedural fairness is afforded to all persons affected by decisions made by Palmera.

## C. Our Safeguarding Approach

In line with the above Guiding Principles, Palmera has developed the following **6-pillar approach** to safeguarding. The details of how we implement this approach are outlined under each of the pillars.

### 1. OUR STAFF AND PARTNERS ARE AWARE OF AND COMMITTED TO THIS POLICY

All **Palmera Staff** (including its board of directors), must, **at a minimum**:

- receive a copy of this Policy on commencement of their engagement with Palmera and read and familiarize with it;
- sign the **Safeguarding Code of Conduct**.
- undergo training on the requirements of this Policy, including in induction, pre-deployment and refresher training opportunities.

All **Partner Staff** involved in the delivery of a Palmera Activity, must, **at a minimum**:

- be aware of this Policy or the policy adopted by that Palmera Partner that deals with child protection and SEAH, and its expectations and obligations with respect to safety and wellbeing of children and adults and the prevention of CAE and SEAH.

### 2. WE IMPLEMENT SAFEGUARDING PRACTICES THROUGHOUT OUR ORGANISATION

Ensuring the safety and wellbeing of our beneficiaries and mitigating the risk of CAE and SEAH requires an organisation-wide approach, both at home in Australia and overseas in our development programs.

#### a. Safeguarding in our strategies, policies and communications

Palmera includes safeguarding considerations when developing its strategies and has in place policies to support its safeguarding practices. Palmera also considers safeguarding issues when communicating with donors and stakeholders to ensure their safeguarding and privacy, and without endangering or stigmatising the people that we portray. We do this by:

- incorporating safeguarding considerations (including protecting against CAE and SEAH) in our organisational and country strategies;
- discussing child protection and safeguarding matters with our board of directors and operational staff to foster a culture of child protection and prevention against SEAH in everything we do;
- having in place an effective complaint handling process that is understood by, and accessible to children and adults, which ensures that complaints are taken seriously and addressed appropriately, including by reporting to the relevant authorities (whether or not required by law) (see pillar 5, below);
- ensuring that Palmera's fundraising and advocacy activities do not pose an unacceptable risk of harm to community members (including children);
- ensuring appropriate protocols and processes are in place for the ethical collection, storage and use of children and adults' stories, photos, videos and images, including gaining informed consent prior to taking images and managing identifying information, to keep them safe. This commitment is further reflected in Palmera's **Ethical Communications Policy**.

**b. Safeguarding in our recruitment**

Palmera's recruitment processes mitigate the risk of harm to the community members with whom we work (including children). Palmera follows strict guidelines in the recruitment of Palmera Staff which are implemented in the interviewing of candidates, reference checks and candidate pre-screening. This includes:

- depending on the nature of the Palmera Activity that the candidate will be directly involved in, requiring candidates to provide a criminal record check (or statutory declarations or other local equivalent where criminal record checks are unavailable) and / or a working with children check (or other local equivalent);
- requesting disclosure from candidates as to whether they have been charged with any children or SEAH related offences;
- conducting verbal referee checks; and
- asking behavioural-based interview questions for candidates who will be working directly with children and adults in the communities in which Palmera works.

Employment contracts for Palmera Staff will contain provisions for the prevention of that member of Palmera Staff from working with children or adult beneficiaries if they present an unacceptable risk to children or risk of SEAH. The contracts will also contain dismissal, suspension or transfer of duties provisions for any Palmera Staff who breaches this Policy or the Safeguarding Code of Conduct.

Palmera will not employ or engage any person if they pose an unacceptable risk to children.

**c. Safeguarding when facilitating Donor Field Visits**

Palmera ensures reasonable precautions are taken to protect against CAE if any Palmera Staff or Palmera Supporters are likely to come into contact with children during any Donor Field Visit. Donor Field Visits by Palmera Staff or Palmera Supporters will invariably involve an element of SEAH risk, given that members of the communities which Palmera serves are likely to be present in any such Donor Field Visit.

Any Palmera Staff or Palmera Supporters undertaking a Donor Field Visit shall adhere to the following **minimum standards**:

- In preparation for the Donor Field Visit, each participating Palmera Staff and/or Palmera Supporter will be provided with:
  - a copy of this Policy, the Safeguarding Code of Conduct and Palmera's Organisational Code of Conduct and will be given information regarding expected behaviour during the visits;
  - a copy of the Ethical Communications Policy, and undergo induction training on the requirements of capturing any images or stories under the Ethical Communications Policy; and
  - a copy of Palmera's Complaints Handling and Whistleblowing Policy and the local Palmera Partner's complaints handling policy to ensure that the participating Palmera Staff and/or Palmera Support will understand and access the local complaints mechanism.
- Palmera Supporters and Palmera Staff must conduct themselves with the utmost professionalism and integrity at all times.
- Donor Field Visits must be arranged through Palmera. Unauthorized visits are when a person visits a community directly or requests access from Palmera Partner, bypassing Palmera. If that occurs, the Palmera Partner must notify Palmera and manage the person according to the guidelines outlined in this Policy.
- Palmera Staff and/or Partner Staff must accompany other visitors to the project sites at all times. Visitors must not spend time with beneficiaries or community members (including any children) unsupervised.
- Any gifts, contributions or correspondence to or with beneficiaries or their children must be facilitated through and screened by the implementing Palmera Partner. Participating Palmera Staff and Palmera Supporters will be made aware that the giving of gifts can be seen as a gesture to bribe or groom a child or vulnerable



adult. It contributes to a power imbalance between adults and children, and between the donor and receiver. The giving of gifts or rewards to children, young people and vulnerable adults is not encouraged. There may be some circumstances where they could be acceptable as long as they are given openly, are of small monetary value, not be based on favouritism. In any case, they need to be screened, approved and facilitated by Palmera and the Palmera Partner.

- Inappropriate or suspicious behaviour of visitors towards any child or adult must be addressed immediately. The Palmera Staff or implementing Partner Staff member accompanying the visitor must seek assistance of their supervisor and follow the guidelines established in this Policy for managing and reporting suspected CAE or SEAH.

### **3. WE UNDERTAKE A SAFEGUARDING RISK ASSESSMENT FOR OUR PROGRAMS**

Our program risk assessment process provides a critical opportunity to identify and mitigate risks of harm to children and adults in the implementation of our programs. In order to conduct an effective risk assessment process, the following practices shall apply:

#### **a. Risk assessment of our local delivery partners**

Palmera carefully selects and assesses the partners with whom we collaborate to deliver our programs to ensure they adopt a similar approach with respect to child protection and SEAH matters. Prior to engaging any Palmera Partner in connection with the delivery of any Palmera Activity, Palmera must ensure that the Palmera Partner:

- has a policy in place aimed at the prevention of CAE and SEAH, have other documented policies and procedures (e.g. human resources guidelines, code of conduct) that explicitly include the prevention of CAE and SEAH and meet the expectations of this Policy, or otherwise agree to adopt or abide by this Policy.
- has in place (or adopt Palmera's) documented survivor/victim-centred processes in place to report and investigate concerns or allegations of CAE and SEAH or policy non-compliance. These reporting procedures should be made publicly available and easily accessible in the context of the community so that community members are aware of the procedures and are able to freely, safely and discretely make a report any allegations of misconduct.

The partnership agreement entered into with each Palmera Partner should reference this Policy and include an agreement to abide by this Policy as well as their own child protection and SEAH policy or related documents. The failure to take preventative measures with respect to child protection or SEAH or to promptly investigate and report allegations thereof should be grounds for terminating any such partnership agreement.

#### *Training and Checks*

If Palmera deems there to be a mid to high level of risk of CAE and / or SEAH in the delivery of the Palmera Activity by the relevant Palmera Partner, Palmera should ensure that the Palmera Partner conduct training on the prevention of CAE and SEAH that seeks to build workplace cultures of respect and accountability. Only those Partner Staff who have completed such training will be permitted to visit project sites in the delivery of the Palmera Activity.

#### **b. Program design risk assessment**

Prior to approving any Palmera Activity, Palmera and / or the relevant Palmera Partner will:

- undertake an assessment to identify the risks to CAE or SEAH occurring in connection with the Palmera Activity as part of its due diligence, including identifying controls to reduce or remove these risks and ensure the safety and protection of children and community members;
- appropriately document this assessment and risk mitigation strategies in the Project Activity Plan (Palmera's project due diligence and planning tool).

Palmera adopts the decision-making framework set out in Attachment A for assessing the level of risk to CAE and the level of risk to SEAH.

#### **4. WE MONITOR OUR SAFEGUARDING STRATEGIES ON AN ONGOING BASIS**

Palmera recognises that effective child protection and prevention of SEAH is an ongoing process that requires constant attention, monitoring and training of relevant individuals and organisations involved in our work and in delivering Palmera Activities.

As part of the ongoing Palmera Activity management, Palmera will continually review the implementation of strategies and measures designed to mitigate the risks of CAE and SEAH identified both at an organisational and programmatic level. We do this by:

- requiring that Palmera Partners involved in the implementation of Palmera Activities provide regular reports through the Monitoring and Evaluation process on the strategies and measures in place to address these risks; and
- ensuring Palmera Partners and Palmera Staff involved in the delivery of Palmera Activities receive ongoing training with respect to child protection and prevention of SEAH matters.

#### **5. WE UNDERTAKE TIMELY AND FAIR INVESTIGATIONS OF ALL COMPLAINTS**

Palmera takes all reports of alleged misconduct and concerns regarding Palmera and Partner Staff behaviour seriously. Palmera must investigate and address any alleged misconduct, concerns or complaints relating to CAE or SEAH in a professional, fair and timely manner, placing the child, survivor/victim's interests at the centre of any such investigation.

Palmera expects all Palmera Staff and all Partner Staff to report, in line with this Policy (see section "a", below), any suspicions of inappropriate behaviour. However, there is no obligation for the affected person to report an incident that has happened to them. In investigating concerns or allegations of CAE or SEAH or any threats to child safety, Palmera takes a child and survivor/victim-centred approach while ensuring that principles of natural justice will prevail.

Palmera and the Palmera Partners will ensure that beneficiaries and members of the community in which Palmera works (including children and / or their families) can make a confidential complaint or report any incident or suspicious behaviour in accordance with Palmera's **Complaints Handling and Whistleblowing Policy**.

Any member of Palmera Staff or Partner Staff making a report or complaints will at all times be protected by Palmera's Complaints Handling and Whistleblowing Policy.

The mechanism for reporting, investigating and resolving complaints of CAE or SEAH is as follows:

##### **a. Reporting:**

- Responsibility for addressing complaints:
  - Any incident, belief or suspicion of CAE or SEAH by a member of Palmera Staff or Partner Staff must be reported immediately to the Chief Executive Officer. This Chief Executive Officer will act as the focal person with respect to any complaints or incidents of CAE or SEAH by a member of Palmera Staff or Partner Staff. If the report relates to conduct of the Chief Executive Officer, then incidents will be reported to the Chairperson of the Board of Directors.
- Documenting the complaint or disclosure:
  - The Palmera Staff member who receives the complaint or disclosure regarding suspected abuse must, as soon as possible, fully document the complaint including the time, place and witnesses to the incident in Palmera's Complaints Register in accordance with the Complaints Handling and Whistleblowing Policy. However, in relation to complaints or disclosures regarding suspected SEAH against an adult victim, the victim may request that their name or identifying details not be recorded or removed from the record.

- Reporting to law enforcement:
  - Palmera must immediately report any allegation it receives of physical or sexual assault against a child to the police (whether in Australia or in the project country), whether or not the child or their parents/guardian have consented to the matter being reported.
  - If the allegation concerns an adult victim, Palmera should report the matter to the police (whether in Australia or in the project country) only if the victim has consented to doing so.
  - If the incident is alleged to have occurred in Australia, the Chief Executive Officer may contact the police, depending on the nature of the incident, to investigate.
- Receiving complaints or disclosures involving children:
  - It is important to take a child-centred approach to complaints involving child victims. This means allowing the child to speak about the incident using their own words; reassuring them that they did the right thing by reporting the incident; reassuring them that the incident is not their fault; and letting them know what will happen next.
- Reporting to government agencies:
  - In the case of reports of suspected CAE or SEAH within a Palmera Activity funded by the Australian Department of Foreign Affairs and Trade (**DFAT**), the Chief Executive Officer will report the incident to DFAT via (i) in the case of suspected CAE, the Child Incident and Notification form and emailed to [childwelfare@dfat.gov.au](mailto:childwelfare@dfat.gov.au) and (ii) in the case of suspected SEAH, and always subject to the wishes and welfare of the victim, the DFAT Sexual Exploitation, Abuse and Harassment Incident Notification Form and emailed to [seah.reports@dfat.gov.au](mailto:seah.reports@dfat.gov.au).
  - In the case of reports of suspected CAE or SEAH within a Palmera Activity overseas, the Chief Executive Officer should report the incident to the relevant child protection agency in accordance with the applicable reporting framework for that agency.
  - This reporting to DFAT or local government agencies will be made within two days of any alleged incident of CAE or SEAH.
- Referral or complaints not falling within the scope of this Policy:
  - If Palmera receives a report concerning an allegation of CAE or SEA that does not involve Palmera Staff or Partner Staff but instead involves individuals who are not part of the Palmera Activity, the Palmera Staff who receives the report should assist the complainant in locating and making their complaint to the appropriate body / organisation ("refer").

**b. Investigation:**

- All investigations into alleged CAE or SEAH conducted shall be undertaken sensitively and confidentially with primary concern for the victim (and the best interests of the child, if applicable).
- The Chief Executive Officer, with approval from the Board of Directors, may refer the matter to a child protection agency to conduct the investigation if it is considered that they have the appropriate skills and expertise to do so.
- The person complained against is to be stood down while the investigation takes place.
- The investigation must not pre-determine guilt or innocence. The person complained against is entitled to a fair and just process.
- Allegations should not be discussed with other people until all issues have been considered and a decision made by the Chief Executive Officer or other person who is delegated to fulfil the task.
- The survivor/victim (or the family of the child) should be informed of the allegation and the action proposed. They should be consulted where possible on the process to be followed.
- Investigations must be completed as promptly as possible, and in any event no later than 15 days from the date of any complaint or disclosure of alleged or suspected CAE or SEAH.

**c. Safety and Support:**

- During any investigation of a reported CAE or SEAH incident, and thereafter, Palmera will ensure that the child or survivor/victim receives appropriate support or assistance, subject to the wishes of the victim (including the family of the child), which may include medical, social, legal and financial support or services, or referrals to such services.
- Palmera, in consultation with the relevant Project Partner, will consider whether there may be immediate safety needs for the child or survivor/victim or if any health or psychological assistance or treatment is required.
- Palmera will ensure at all times that the necessary means for the child or survivor/victim’s protection and rehabilitation are provided for (including the family of the child).

**d. Decision:**

- Promptly following the investigation, the Chief Executive Officer is to make a decision as to whether to terminate the tenure of the person complained against, whether to report the incident to law enforcement agencies (see below), whether further investigation is required or whether the findings of the investigation have satisfied the Chief Executive Officer that the complaint is not founded.
- Palmera will not retain any person in a role if the investigation shows that they pose an unacceptable risk of SEAH or an unacceptable risk to children.
- The decision made should be documented and filed, noting that in the case of SEAH against an adult victim, the victim may request that such record de-identify the victim.

**e. Confidentiality:**

- All cases of CAE or SEAH are to be handled with utmost care and confidentiality to protect the wellbeing of the victim. The name or identify of the victim and his or her family must not be disclosed to any person outside Palmera and may only be documented in the confidential investigation report.
- Investigation reports and decisions are to be marked confidential and are not to be released to any third party other than law enforcement agencies if required to assist with their investigations.

**6. WE STRIVE TO CONTINUALLY IMPROVE OUR SAFEGUARDING APPROACH**

Palmera looks to continually learn and improve on addressing the challenges related to CAE and SEAH involved in its operations, and ensure that its Palmera Staff and Palmera Partners are equipped to deal with these ongoing challenges.

## Reviewing this Policy

This policy is to be reviewed every three years, or earlier if appropriate, and lessons learned incorporated into subsequent versions.

Date	Version	Review Description	Reviewed By	Approved By
April 2021	1	Original	N/A	Board of Directors
<b>September 2021</b>	1.1	Revised to remove minor repetition in provisions	Policy Advisor	CEO

## Attachment A: Risk Assessment Framework

Assessment of Risk	Questions to Consider
<b>Child Safety</b>	<ol style="list-style-type: none"> <li>1. Will the Palmera Activity involve potential contact with children, impact on children or work with children?               <ol style="list-style-type: none"> <li>a. If no, Palmera will reassess the potential contact and impact on children as part of its ongoing monitoring practice.</li> <li>b. If yes, move to step 2.</li> </ol> </li> <li>2. Undertake a thorough assessment of child protection risk in the delivery of the Palmera Activity, which should be documented in the Project Appraisal and incorporated into the Project Activity Implementation Plan.</li> <li>3. Adopt risk mitigation strategies to respond to the risks identified.</li> </ol>
<b>Sexual Exploitation, Abuse and Harassment</b>	<ol style="list-style-type: none"> <li>1. Is there a risk of SEAH in the delivery of a Palmera Activity?               <ol style="list-style-type: none"> <li>a. If no, Palmera will reassess the level of risk as part of its ongoing standard risk management practice.</li> <li>b. If yes, move to step 2.</li> </ol> </li> <li>2. Undertake a thorough assessment of SEAH risk in the delivery of the Palmera Activity, which should be documented in the Project Appraisal and incorporated into the Project Activity Implementation Plan.</li> <li>3. Apply appropriate risk mitigation strategies.</li> </ol>

In assessing whether there is a risk to child safety or a risk of SEAH in the delivery of a Palmera Activity and the appropriate level of risk, Palmera will consider the factors set out in [Attachment B](#) as part of its due diligence, which includes consideration of the nature of the Palmera Activity as well as organisational risks relating to the relevant Palmera Partner.

## Attachment B: Palmera Activity Risk Factors

### Project activity risk

Risk factors	Potential Considerations
<b>Personnel deployed:</b>	<ul style="list-style-type: none"> <li>• away from their usual location/country of residence</li> <li>• to remote/rural location/s</li> <li>• to a humanitarian or emergency setting</li> <li>• who are unaccompanied</li> </ul>
<b>Degree of isolation</b>	<ul style="list-style-type: none"> <li>• involves being alone with children (not frequently enough to be working with children)</li> <li>• involves activities that are away from organisation location</li> <li>• involves meeting one-on-one with children (not frequently enough to be working with children)</li> </ul>
<b>Interaction with individuals, especially women, who:</b>	<ul style="list-style-type: none"> <li>• are young adults</li> <li>• have a disability</li> <li>• are of an ethnic, indigenous, religious or sexual minority</li> <li>• are experiencing poverty</li> <li>• are sex workers</li> <li>• are part of families impacted by disasters</li> <li>• are displaced, refugees, migrants or asylum seekers</li> <li>• are part of female headed households</li> <li>• are victims/survivors of trafficking and/or other forms of sexual and gender-based violence</li> <li>• are in contact with the law</li> <li>• are accessing residential/shelter services</li> </ul>
<b>Working with children</b>	<ul style="list-style-type: none"> <li>• engages with children whose true or cognitive age impacts on their ability to protect themselves</li> <li>• engages with children who have challenges that contribute to their vulnerability (e.g. psychological, situational)</li> <li>• engages with children who do not have many support systems?</li> <li>• involves demonstrating a skill to children</li> <li>• position involves need for physical contact/touching children?</li> <li>• involves providing a personal service? (e.g. washing, dressing, toileting)</li> </ul>
<b>Circumstances where staff have access to sensitive/confidential information</b>	<p>For example:</p> <ul style="list-style-type: none"> <li>• health care providers</li> <li>• counselling services</li> <li>• medical personnel</li> </ul>

	<ul style="list-style-type: none"> <li>• humanitarian aid coordinators</li> </ul>
<p><b>High risk activities</b></p>	<p>For example:</p> <ul style="list-style-type: none"> <li>• construction/infrastructure in developing country settings – these can have a higher risk of SEAH given the construction industry is male dominated; and that construction in developing countries often involves the temporary movement of workers from other areas</li> <li>• humanitarian</li> <li>• disaster response</li> <li>• security in conflict or post conflict or disaster settings</li> </ul>
<p><b>Provision of goods and/or services that may create a power imbalance</b></p>	<p>For example:</p> <ul style="list-style-type: none"> <li>• services for vulnerable groups of women (eg. escaping trafficking or gender based violence)</li> <li>• food distribution</li> <li>• medical supplies</li> <li>• emergency supplies following a disaster</li> <li>• training</li> <li>• residential/shelter services</li> <li>• disability services</li> <li>• justice facilities</li> <li>• counselling and support services</li> <li>• community consultation (data collection, surveying, training)</li> <li>• health sector programs</li> <li>• parenting and child protection programs</li> </ul>
<p><b>Staff or personnel who have an actual or perceived level of authority</b></p>	<p>For example:</p> <ul style="list-style-type: none"> <li>• security workers</li> <li>• police</li> <li>• teachers</li> <li>• aid workers</li> </ul>

## Organisational risk

Risk factors	Potential Considerations
<p><b>Does the organisation?</b></p>	<ul style="list-style-type: none"> <li>• have poor leadership on PSEAH or child protection</li> <li>• have a historic lack of diversity in the workplace</li> <li>• fail to consider child protection or PSEAH in core organisational policies and procedures</li> <li>• have geographically isolated work spaces, with employees working in small groups and having fewer opportunities to interact with their Head Office.</li> <li>• have primarily young workforces</li> <li>• normalise “sexualised banter”</li> <li>• tolerate/encourage alcohol consumption</li> <li>• have a very hierarchical structure i.e. are there both high-ranking (Executives) and low-ranking employees in the organisational hierarchy; are there gendered power disparities (e.g. most of the low-ranking employees are female)</li> <li>• have poor reporting mechanisms and transparency around CAE or SEAH incidents</li> <li>• have personnel having unsupervised contact with children or activities/engagement with children that is not observed or supervised</li> <li>• have personnel or activities that involves developing close, personal, long term relationships with children or involve transporting children</li> </ul>