



1. Rationale

The Policy outlines Edmund Rice Community Service's (ERCS) safeguarding approach that guides practice and engagement. It demonstrates a deep commitment to protecting from harm any children, adults and families who interact in any way with ERCS. Furthermore, it directs our conduct in safeguarding children and adults-at-risk, monitoring the implementation of professional standards and the submission and response to notifications of suspected or actual maltreatment.

2. Scope

This Policy applies to all personnel related to Edmund Rice Community Services, including all individuals employed by or engaging in services governed or provided in association with ERCS. This document is relevant to volunteers, Advisory Council members, Board members, contractors, partnership representatives, and any other individuals or groups that otherwise engage with ERCS or its various ministries and entities. All personnel must comply with this Policy at all times.

Organisations that work or partner with ERCS must read and comply with this Policy and the safeguarding procedures relating to its implementation and the ERCS Safeguarding Code of Conduct.

2.1 Geographical Application

This Policy applies in all locations and jurisdictions where ERCS operates or provides a service.

2.2 Legislation/Regulation

This Policy reflects the legislative and broader policy context where ERCS operates. It complies with relevant regulations regarding individuals who have additional support or care needs. There is alignment with national child protection and criminal law and applicable state legislation. Where there is any discrepancy between legislation and any ERCS policy, the legislation will prevail. Furthermore, the United Nations Convention on the rights of the Child (UNCRC) and Universal Declaration of Human Rights (UDHR) underpins the principles, policies and practices that inform Edmund Rice Community Services' approach to safeguarding. The Convention is the foundation for child protection globally and recognises children's rights as human rights.

2.3 Objective

The objective of this Policy is to establish a foundation for safeguarding processes and procedures for ERCS which contribute to:

1. **Safeguarding children and adults:** by supporting the implementation of leading practice that prevents, minimises and is responsive to risk and actual or suspected harm.
2. **Guide all personnel:** by ensuring that all those who hold a duty of care towards children and adults-at-risk are aware of their responsibilities and that there is a clear understanding of expectations for any individual acting for or on behalf of ERCS.



3. Policy Statement

ERCS is committed to a strong, proactive, and responsive culture that upholds the safety and security of all. ERCS is devoted to fostering and maintaining an inclusive culture that celebrates diversity and defends the rights of all people, supporting individuals to thrive and experience belonging. As such, ERCS maintains a zero-tolerance approach to any form of abuse and adopts a child and victim/survivor-centred approach that is both proactive and responsive to safeguarding needs (see section '7. Appendices – 7.2 Glossary' for terms and definitions). As every person has the right to feel and be safe, ERCS explicitly prohibits all forms of harmful behaviour, including abuse, harassment, exploitation, or any other exploitative, neglectful, or emotionally abusive treatment of any individual.

For a comprehensive understanding of ERCS Safeguarding practices, this policy must be read in conjunction with the '*ERCS Safeguarding Procedures*'.

Despite rigorous efforts, ERCS acknowledges that barriers to child and adult safety still exist within our society and for that reason, persistent efforts to safeguard children, young people and adults from harm are required. There are also diverse factors that can result in an increased risk of harm and marginalisation or may result in barriers to equitable participation. These diverse factors include age, race, variances in physical, mental, intellectual, or sensory abilities, economic background, varied literacy skills, education, modern slavery, and linguistically or culturally diverse backgrounds. This includes Aboriginal or Torres Strait Islander people and those with diverse genders, including individuals identifying as LGBTIQ+ or other diverse factors not represented here. At times it is not necessarily the diversity that creates this risk but even external structural, contextual or cultural factors, systemic power dynamics or perceptions of these.

To mitigate these risks and to maintain our strong and safe culture, ERCS acknowledges and commits to the following statements:

- All personnel have a responsibility to support a safe culture across ERCS.
- It is mandatory for all ERCS personnel to report any actual or suspected Safeguarding or Sexual Exploitation, Abuse and Harassment (SEAH) related concerns. This includes reports regarding bullying, harassment, and discrimination (e.g. racism, sexism and ableism).
- Staff and volunteers are required to respond appropriately to the needs of one another and each individual with whom they interact.
- Working with Children Checks are mandatory for all personnel.
- Services provided by ERCS are of leading practice standards.
- Diverse and unique identities and abilities of all persons, especially those most marginalised, including Aboriginal people, are respected, valued and celebrated across ERCS.

To clearly outline how all personnel can contribute to a safe culture through their conduct, ERCS has a safeguarding Code of Conduct. It outlines expected standards of behaviour relevant in both physical and online environments. For a deeper understanding of the safeguarding requirements for personnel, the Code of Conduct must be read in conjunction with this document. Compliance with the Code of Conduct is mandatory, and non-compliance may result in disciplinary action, including termination of engagement with ERCS and criminal proceedings.

It is paramount that all individuals to whom this Policy applies to take responsibility to ensure that every child, young person, and adult feels and is safe, secure, and protected.

3.1 Safeguarding Approaches

Do no harm approach

ERCS adopts a strict 'do-no-harm' approach in all responses to Safeguarding related matters. This means ERCS avoids exposing people to additional risks through either action or inaction. This approach requires a holistic view of the situation and risk, helping to mitigate and effectively navigate any negative impacts from our responses to concerns. Wherever possible, responses need to be planned, consistent and collaborative, ensuring that those impacted by the risk or decisions are involved in discussions as far as possible.

Child and victim/survivor-centred approach

The best interests of the child or victim/survivor must be the primary consideration in all decisions. In instances, especially where the victim/survivor's views and wishes cannot be ascertained, appropriate close and safe family members or relatives will be provided with the opportunity to represent the victim/survivor's best interests. Within any responses to safeguarding matters, procedural fairness must be recognised as a right for all individuals.

Approach to risk

ERCS has clear and effective risk assessment, treatment and review processes. Proactive and early risk identification is relevant to physical and online environments. Risks are reviewed and monitored differently by the organisation, ministry, and individual. Programs cannot proceed without risk assessments. All risk assessments undertaken are evaluated on an ongoing basis or as required (including after incidents, near misses and complaints), which is vital in ensuring continuous learning and improvement.

3.2 Safeguarding Principles

The following principles reflect the Charism of the Blessed Edmund Rice and the values of ERCS. They guide practice and engagement with all people who come into contact with an ERCS ministry or associated service.

- **Zero tolerance of abuse, exploitation, and harassment**

ERCS strictly prohibits all forms of abuse against all individuals. ERCS maintains a zero-tolerance of inaction regarding any form of abuse, harassment, or exploitation. For the purpose of this Policy, 'zero-tolerance' does not equate to the want to receive zero reports. Therefore, it is mandatory for all persons within the scope of this Policy to report any safeguarding concerns or allegations. It also means that every concern or allegation must be acted upon and responded to fairly. The abuse, exploitation, or harassment of any person, particularly children and adults at risk, will attract civil, criminal, or disciplinary action.

- **Diversity respected**

All individuals are unique and will be treated equally and fairly. Everyone has the right to be safe regardless of any diverse factors. These factors may include socioeconomic status, nationality, sexuality, gender, culture, race, ethnicity, beliefs, health, or any other status. ERCS is committed to the rights of all people and is dedicated to creating a safe culture by upholding these diverse factors. ERCS also promotes equality and reduces factors working against these, like minimising power imbalances, where possible. As part of ERCS's commitment to continuous improvement, ERCS will continue to develop awareness and practices regarding diversity and equity.



ERCS acknowledges that gender inequality and power imbalances exist despite efforts to uphold diversity, equality and inclusivity. Maintaining an awareness of this is imperative when addressing safeguarding risks, including Sexual Exploitation, Abuse and Harassment (SEAH). ERCS commits to addressing these imbalances because where significant power imbalances exist, the risk of Safeguarding concerns and SEAH (including exploitative transactional sex and fraternisation) is heightened. ERCS further acknowledges that children, females, others identifying as a diverse gender, and individuals with varied physical, mental, intellectual, or sensory abilities are at higher risk of SEAH.

- **Committed leadership**

Members of leadership work collaboratively to embed safeguarding within the organisation's culture. This is vital as it drives the development of a strong culture and sets a clear precedent for others. Leadership can determine the existence and strength of a safe culture. ERCS leaders must:

- model respectful behaviour, which sets clear expectations and boundaries for others,
- seek and utilise emerging opportunities to help raise awareness of safeguarding; and,
- support reporters, survivors or whistle-blowers to feel safe when reporting unacceptable behaviour.

- **Shared responsibility**

All to whom this Policy applies must comply with and enact these principles and practices for them to be meaningful and successful. Safeguarding is everyone's responsibility, and collective community responses are required to ensure a safe culture is fostered and maintained across ERCS. ERCS calls upon its partners for their commitment to reducing the risk of and responding appropriately to child abuse and SEAH concerns. All organisations are responsible for building their capacity to respond sensitively and effectively to safeguarding concerns.

- **Professional responses**

All concerns regarding the safety, development, health or well-being of a child or adult will be managed with a high degree of professionalism. At all times, matters will be responded to impartially and promptly, and appropriate confidentiality will always be maintained. Personnel must declare conflicts of interest. Any internal ERCS investigations will afford procedural fairness and ensure all individuals involved in concerns are supported appropriately.

- **Accountability and transparency**

ERCS will maintain transparent safeguarding operations. ERCS will create opportunities for others to experience and understand internal safeguarding systems. ERCS is accountable to all who engage with any service provision, any partners and the broader communities where our services operate. Furthermore, processes relating to effective documentation, monitoring and review will support accountability. A safe culture of collaboration and integrity will further enable this accountability. ERCS acknowledges that the presence of abuse, exploitation or harassment within our community is a failure of responsibility. Accountability and transparency are paramount in addressing this as they contribute to an increasingly responsive and more robust culture. This leads to better monitoring, an improved understanding of risk, and ultimately improved safeguards, reducing the risk of safeguarding and SEAH.

By working to uphold these principles, ERCS is demonstrating genuine respect for the inherent value, dignity, and worth of all. Fundamental human rights are upheld as these are the cornerstone of developing strong communities where every member feels safe and secure, enabling connectedness and belonging.

3.3 Reporting Responsibilities

It is the responsibility of ERCS to ensure that the reporting procedures are made available to all personnel. All staff and volunteers must know and understand their safeguarding responsibilities. It is mandatory for all personnel to report any safeguarding-related concerns via the reporting processes outlined within the *ERCS Safeguarding Procedures*. All personnel must:

- Undertake a mandatory report where a concern or allegation regarding the safety or well-being of a child or adult-at-risk.
- Adhere to ERCS reporting procedures and the specific timeframes concerning reporting (refer to the *ERCS Safeguarding Procedures* for further details).
- Always prioritise the need to respond to immediate or significant safety concerns.
- Report matters as soon as practical unless they require an urgent response.
- Do not direct any reports to the person to who the concern relates.
- Declare any conflicts of interest and adhere to standards of practice regarding these as outlined within the '*ERCS Safeguarding Procedures*'.
- Utilise professional expertise made available via the organisation when required.
- Always uphold an individual's rights to privacy and treat all matters confidentially.
- Comply with laws and legislative reporting requirements, including in jurisdictions where a Reportable Conduct Scheme operates. See '*7.2 Appendix 2: Glossary*' for further details.

Individuals may be mandated by law to report safeguarding concerns directly to authorities. If these concerns are in any way directly or indirectly associated with ERCS, the ERCS Safeguarding Director or other relevant members of management must be advised of any external reports.

3.4 Redress

Safeguarding matters of a historical nature are to be reported via the internal reporting process or by contacting the ERCS Safeguarding Director directly. The ERCS Safeguarding Director is responsible for investigating and seeing any inquiries or investigations through to resolution with the support of the ERCS Operations Manager and Chief Executive Officer. The Safeguarding Director must collaborate with the Ministry Leader and Advisory Council Chair when it is appropriate to do so.

4. Related Documents

For individuals seeking further information regarding ERCS's robust safeguarding practices, this Policy should be read in conjunction with the following:

- ERCS Code of Conduct
- ERCS Safeguarding Procedures
- ERCS Safeguarding Commitment Statement
- ERCS Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy
- ERCS Images Policy
- ERCS Whistle-blowers Guideline
- National Child Safe Principles
- Relevant Legislation in each State and Territory
- Applicable Reportable Conduct Schemes



5. Key Responsibilities

Approval and owner	Details
Approving Authority	ERCS Board
Advisory Committee to Approval Authority	ERCS Risk and Governance Committee
Policy Owner	Chief Executive Officer
Next Review Date*	1 February 2026

***This Policy is reviewed at least every three years.** The review process will seek contributions and feedback from personnel and external stakeholders. ERCS is committed to reviewing the safeguarding Policy following incidents or near misses. Changes may also be made to the Policy following a key legislative change or emerging leading practice standards.

6. Version Control

Version control	Date approved	Description of change
Version 2.0	March 2023	<ul style="list-style-type: none"> • Conversion to ERCS document • Updated terminology • Inclusion of Victorian and NSW RCS requirements
Version 1.0	January 2021	First version



7. Appendices

7.1 Appendix 1: Declaration

I, _____ (insert name), acknowledge that I have read or have been made aware of and understand my responsibilities as outlined within the:

- Edmund Rice Community Services (ERCS) Safeguarding Policy; and
- Edmund Rice Community Services (ERCS) Safeguarding Code of Conduct.

I agree to comply and act in accordance with the responsibilities and obligations set out within these documents.

I know what to expect if I make a report or an allegation is made against me. I understand and agree that a breach of the ERCS Safeguarding Policy, Safeguarding Procedures or Safeguarding Code of Conduct may provide grounds for my employment/engagement with Edmund Rice Community Services to be terminated.

I also understand that a breach of the ERCS Safeguarding Policy, Safeguarding Procedures or Safeguarding Code of Conduct could result in criminal prosecution.

I authorise Edmund Rice Community Services Ltd. to undertake any necessary inquiries, including criminal record checks and reference checks, as part of my appointment or recruitment process.

Full name: _____

Signed: _____

Date: _____

Please note that if a volunteer is signing this form and they are under 18 years of age, a parent or guardian must also sign below.

Full name: _____

Signed: _____

Date: _____

7.2 Appendix 2: Glossary

Ableism	Discrimination in favour of able-bodied people.
Abuse	There are many different forms of abuse. Abuse includes physical, sexual, emotional, neglect, bullying, child labour and domestic violence. Abuse can be experienced by all people of any age, gender, ethnicity and social background, abilities, sexual orientation, religion, or political beliefs. ¹ Abuse can occur in any setting and between individuals, including child-on-child, adult-on-adult and adult-on-child abuse.
Adult-at-risk	People over 18 years of age who have increased vulnerability 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 or other factors. It also includes adults placed in a situation of vulnerability due to power imbalances such as organisational hierarchies or partnerships.
Bullying	The inappropriate use of power by an individual or group causing injury to another person, including physically or emotionally. It is usually deliberate and repetitive. The bullying may be physical or psychological (verbal and non-verbal). Physical bullying includes pushing, hitting, punching, kicking, or other actions causing hurt or injury. Verbal bullying includes insults, taunts, threats and ridiculing. Psychological bullying includes intimidation and ostracism.
Business partner (<i>partner</i>) and ' <i>Downstream Partner.</i> '	Any organisation ERCS enters into an agreement with or works in conjunction with to deliver its programs or services. <i>Downstream Partner</i> Individuals, organisations or relevant others engaged by a Partner of, or work with, a Partner of ERCS to implement or deliver its programs/services.
Child	In accordance with the United Nations Convention on the Rights of the Child, 'child' means every human being under the age of 18 unless maturity is attained earlier under the law applicable to the child. For the purposes of this Policy, ERCS considers a child to be a person under the age of 18 years. ¹
Child abuse	Abuse is an act that endangers a child's health, well-being or development. It can be a single event or a series of traumatic events. It can be perpetrated with intent or unknowingly by oneself, an adult or a child. Child abuse includes but is not limited to: <ul style="list-style-type: none"> ● Cumulative harm ● Emotional abuse ● Exposure to family violence ● Grooming ● Multi-dimensional harm ● Neglect ● Physical abuse ● Sexual exploitation, abuse and harassment (SEAH) ● Exploitation, e.g. child labour ● Harmful Cultural Practices <p>Abuse happens to children of all genders, ages, ethnicity and social backgrounds, abilities, sexual orientation, religious beliefs and political persuasion. In some cases, professionals and other adults working with children in a position of trust also abuse children.</p>

¹ Mary Mackillop Today (2021). Safeguarding Policy: Glossary. Retrieved from: <https://www.marymackilloptoday.org.au/who-we-are/publications-and-reports/our-policies/safeguarding-policy/>

Child and victim/survivor-centred approach	<p>This includes:</p> <ul style="list-style-type: none"> • Treating the victim/survivor with dignity and respect, • Ensuring the immediate safety and protection needs of the victim/survivor are met as far as possible, • Involving the victim/survivor in decision-making, • Providing the victim/survivor with comprehensive information throughout any response or investigation, • Practising non-discrimination based on gender, age, race/ethnicity, ability, sexual orientation, or other characteristics, • Considering the need for counselling and health services to assist the victim/survivor with their recovery, • Protecting privacy and confidentiality; and, • Promoting fair and expedient reporting and investigation.
Contact with children	Working on an activity or in a position that involves or may involve contact with children, either under the job description or due to the nature of the work environment.
Cumulative Harm	Cumulative harm is the effect of multiple adverse or harmful circumstances and events in a child's life. Cumulative harm may be caused by an accumulation of a single recurring adverse circumstance (such as unrelenting low-level care); or by multiple circumstances or events (such as persistent verbal abuse and denigration, inconsistent or harsh disciplines and /or exposure to family violence).
Downstream partner	see ' <i>Business partner.</i> '
Emotional abuse	<p>This occurs when a child's parent, caregiver or any other adult repeatedly rejects the child or uses threats to frighten the child. This may involve children:</p> <ul style="list-style-type: none"> • Being repeatedly rejected, called names or being put down, • Being threatened, • Experiencing continual coldness to the extent that it damages their physical, social, intellectual or emotional development, or, • Being exposed to family violence.
Exposure to Family Violence	<p>Family violence is behaviour by a person towards a family member that is:</p> <ul style="list-style-type: none"> • Physically or sexually abusive, • Emotionally (psychologically) abusive, • Being coercive, controlling or dominating in any way towards a family member, • Causing a child to hear or witness or otherwise be exposed to the effects of behaviour referred to above • Exposing a child to family violence including seeing, hearing or experiencing violence in various ways.
Exploitation	Includes 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 perpetrating this act against another person, e.g. child labour.
Fraternisation	This refers to any relationship occurring in the course of conducting business that involves — or appears to involve — partiality, preferential treatment or improper use of rank or position, including but not limited to voluntary sexual behaviour. It includes sexual behaviour not amounting to intercourse, a close



	or emotional relationship involving public displays of affection or private intimacy and the public expression of intimate relations. ²
Grooming	<p>Predatory behaviour that prepares a child for sexual abuse. Many perpetrators of sexual offences against children purposefully create relationships with children and young people, their families and carers in order to establish the conditions necessary for them to abuse the child. For example:</p> <ul style="list-style-type: none"> • Spending special time with a child e.g. in private settings, away from their family or organisation, including online. • Isolating the child or young person from family and peers. • Giving personal to a child. • Showing favouritism. • Allowing the child to step out of boundaries or rules. • Touching the child inappropriately or testing physical boundaries. • Testing and breaking professional boundaries.
Harmful Cultural Practices	Traditional/customary practices such as child marriage, female genital mutilation (FGM), skin marking, and honour-based violence are forms of violence. These are generally committed over long periods that communities and societies begin to consider as part of acceptable cultural practice. These are mostly practised against women or girls ³ .
Harmful Sexual Behaviour in children	Harmful sexual behaviour is developmentally inappropriate sexual behaviour displayed by children and young people and may be harmful or abusive (derived from Hackett, 2014). It may also be referred to as sexually harmful behaviour or sexualised behaviour. It encompasses a range of behaviour, which can be displayed towards younger children, peers, older children or adults. It is harmful to the children and young people who display it, as well as the people it is directed towards. ⁴
Mandatory Reporting	<p>Mandatory and immediate (within two working days of becoming aware of an alleged incident) reporting by all staff and DFAT partners of any alleged incident of sexual exploitation, abuse or harassment related to the delivery of DFAT business. This includes any alleged incident that poses a significant reputational risk to DFAT. For example, an allegation against a senior staff member of a partner organisation.</p> <p>Mandatory Reporting (within five working days) by all staff and DFAT partners of any alleged Policy non-compliance; for example, failure to adhere to the PSEAH Policy Minimum Standards or principles.</p>
Multi-Dimensional Harm	Multi-dimensional harm occurs when more than one abuse type is experienced at the same time, e.g. sexual abuse also involves physical abuse and emotional abuse at the same time.
Neglect	The persistent failure or the deliberate denial to provide the child with clean water, food, shelter, sanitation or supervision or care to the extent that the child's health and development are at risk.
Partner	(see 'Business partner')
Physical	Physical abuse occurs when a child suffers or is likely to suffer significant harm from an injury inflicted by a child's parent, caregiver, or any other adult. The

²Australian Government, 2019. Department of Foreign Affairs and Trade, *Preventing Sexual Exploitation, Abuse and Harassment Policy*. Website: <https://www.dfat.gov.au/international-relations/themes/preventing-sexual-exploitation-abuse-and-harassment>

³ UNICEF, 2022. Child Protection, *Harmful Practices*. Website: <https://www.unicef.org/protection/harmful-practices>

⁴ Reference: *National Society for the Prevention of Cruelty to Children. Oxford Reference. Retrieved 17 Feb 2023*



	<p>injury may be inflicted intentionally or maybe the unintentional consequence of physical punishment or physically aggressive treatment of a child. This may take the form of punching, beating, shaking or otherwise harming a child.</p>
<p>Reportable Conduct Scheme</p>	<p>Reportable Conduct Schemes (RCS) exist within various Australian States. These schemes aim to improve organisations’ responses to allegations of child abuse and neglect relating to misconduct of staff or volunteers. These Schemes are legal requirements, and they bind people in certain positions within specific types of organisations to specific obligations. These reports are often made by those internal to the organisation.</p> <p>At the time of this Policy’s approval date, there are current Reportable Conduct Schemes operational in:</p> <ul style="list-style-type: none"> • Victoria; and, • New South Wales. <p>It is anticipated that the RCS for Tasmania will be brought into effect on the 1st of January 2024. Queensland and South Australian governments continue to assess the scope and benefit of establishing a Reportable Conduct Scheme.</p>
<p>Safeguarding</p>	<p>Actions, policies and procedures that create and maintain protective environments to protect people from exploitation, harm and abuse of all kinds. This encompasses protecting children and adults-at-risk from abuse and maltreatment, preventing harm to children or adults-at-risk health or development, and ensuring children grow up with the provision of safe and effective care that enables them to have optimum life chances.</p>
<p>Sexual Abuse</p>	<p>The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions, for the sexual stimulation or gratification of the perpetrator or any other reason. It covers sexual offences including but not limited to: attempted rape (which includes attempts to force someone to perform sex, physical penetration including orally), and sexual assault (which includes non-consensual kissing and touching).</p> <p>All sexual activity with someone under the age of consent is considered sexual abuse. This is regardless of the age of majority or age of consent locally. These can be contact or non-contact acts, including threats and exposure to pornography.⁴</p> <p>Child sexual abuse occurs when a person uses power, force or authority to involve a child in any sexual activity. Behaviour sex offenders engage in may include:</p> <ul style="list-style-type: none"> • Touching or fondling children, • Sending, receiving, inviting or engaging in obscene or suggestive phone calls/texts/conversations to, from or with children, • Exhibitionism and or voyeurism in front of children, • Exposing children to pornographic images; or, • Penetration with a penis, finger, body part or other object into the mouth, anus or vagina. <p>It is important to note that sexual abuse includes both contact and non-contact behaviours.</p>



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. (DFAT, 2019)
Sexual Harassment	This occurs when a person makes an unwelcome sexual advance towards another person. This may include an unwelcome sexualised request or engaging in unwelcome sexualised conduct. These occurrences are circumstances in which a reasonable person, knowing all of the context, 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. ⁴
Transactional Sex	People can be exploited through transactional sex. This is the exchange of money, employment, goods or services for sex or sexual acts. This can occur even in places where sex work is legal. They may not identify with the term “sex worker”. For a person purchasing sex in this setting, it is often impossible to distinguish between exploitative and non-exploitative transactional sex. ⁴
Victim/ Survivor	A person who is, or has been, sexually exploited, harassed, or abused. The individual defines the language to be used in relation to a specific case. The term of victim or survivor should only be used when protecting the individual’s identity and upholding their rights to privacy and confidentiality.
Zero-tolerance	Of inaction in relation to reporting concerns and responding to matters and zero tolerance for denying justice and fair procedural processes for all involved.

⁴Australian Government, 2019. Department of Foreign Affairs and Trade, *Preventing Sexual Exploitation, Abuse and Harassment Policy*.
Website: <https://www.dfat.gov.au/international-relations/themes/preventing-sexual-exploitation-abuse-and-harassment>