

 BOND UNIVERSITY	INTERNATIONAL OUTBOUND STUDENT MOBILITY PREVENTION OF SEXUAL HARM PROCEDURE
Procedure Owner:	University Registrar
Contact Officer:	Director, Student Success and Wellbeing
Approval Authority:	University Registrar
Date of Next Review:	February 2025

1. PURPOSE AND OBJECTIVES

The purpose of this Procedure is to prevent or minimise as far as practicable the risk of [Sexual Harm](#) in the conduct of Outbound Student Mobility (OSM) activities. Bond’s positive duty of care encompassing awareness-raising and education is enhanced through active risk management. In the context of OSM, this document outlines the procedures through which the University:

- Acknowledges and assesses the risk of sexual harm.
- Determines appropriate standards of risk management with regard to sexual harm.
- Develops and implements strategies and controls to prevent sexual harm.
- Outlines roles and responsibilities for conducting risk management and educational activities around the prevention of sexual harm ([PSH](#)) in the organisation of OSM activities.

2. AUDIENCE AND APPLICATION

This Procedure applies to all members of the Bond Community where they are involved in organising or participating in an OSM activity including staff, students and prospective students, including recipients and awardees of scholarship programs.

This Procedure also applies to:

- Contractors and sub-contractors, such as consultants, advisors, suppliers, and other entities engaged by Bond University for OSM activities (referred to as ‘contractors’ within this Procedure), and their personnel directly involved in these activities;
- [Downstream partner](#) organisations and institutional partners collaborating with Bond University, such as non-government organisations (NGOs), host organisations, joint venture partners, and universities where students are studying.

3. ROLES AND RESPONSIBILITIES

Role	Responsibility
University Registrar	<ul style="list-style-type: none"> ▪ Oversees this Procedure.
Chief Integrity Officer	<ul style="list-style-type: none"> ▪ Ensures that processes for reporting concerns are safe, fair, accessible, and focused on the Complainant’s needs, and that personnel handling concerns are adequately trained. ▪ Following investigation of a reported incident, assesses whether remedial action is warranted and has occurred.
UMC Member responsible for OSM activity	<ul style="list-style-type: none"> ▪ Ensures agreements with partners comply with this Procedure. ▪ Approves all student travel activities.
Director, Student Success & Wellbeing	<ul style="list-style-type: none"> ▪ Contact Officer for this Procedure. ▪ Oversees and provides advice on Outbound Student Mobility, particularly with respect to compliance requirements and student wellbeing and safety. ▪ Monitors and evaluates implemented controls for PSH.
OSM Coordinator	<ul style="list-style-type: none"> ▪ Adopts University risk management practices when planning and managing an OSM activity including retention of documentation in the University’s central OSM depository. ▪ Identifies risk including but not limited to sexual harm risk and determines the appropriate standards of risk management for an activity, in accordance with this Procedure and other OSM policies and procedures. ▪ Implements appropriate sexual harm prevention measures. ▪ Reassess risk including but not limited to sexual harm throughout the duration of a program or activity. ▪ Ensure appropriate development, supply and storage of predeparture and pre-arrival documentation. ▪ Reports activity-specific sexual harm risks to Senior Management. ▪ Ensures awareness and training of PSH is provided to staff, students, contractors and downstream partners in accordance with this Procedure.

Staff & Students planning outbound travel	<ul style="list-style-type: none"> ▪ Notifies the University in advance of outbound travel plans for University-sanctioned, scheduled and supervised campus activities, including emergency contacts and insurance coverage details.
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4. PREVENTING SEXUAL HARM

Bond University acknowledges that OSM activities related to study, research, and teaching programs may expose members of the Bond Community to potential risks of sexual harm. This Procedure is supported by policies and procedures with a focus on safety for all members of the Bond Community (refer to [Related Documents](#)). In particular, the University's commitment to preventing sexual harm is exemplified through the [Sexual Harm Policy](#).

5. RISK MANAGEMENT

To effectively manage risk for all OSM activities, including but not limited to, the risk of sexual harm, the University has implemented a series of university-wide strategies and actions.

5.1. Risk Assessment

Bond University adopts a proportional approach to risk management. A comprehensive Risk Management Assessment (RMA) is to be completed prior to committing to an OSM activity.

While not all OSM activities are funded by the Department of Foreign Affairs & Trade (DFAT), the University has adopted a risk management framework for PSH to align with the [DFAT Prevention of Sexual Exploitation, Assault & Abuse \(PSEAH\) Policy](#).

Specific to PSH, risk assessment should include the following two steps:

Step 1: Analyse and evaluate the sexual harm (SH) risk

- a) Assessing the factors which heighten the likelihood of SH such as gender, age, disability, language, displacement, power differential, sexual preference, education, alcohol, health and poverty.
- b) Measuring the likelihood (low, medium, high or very high) of SH risk by evaluating the business activity along with organisational and reputational risks and how they may intersect.

Step 2: Treat the level of risk

After determining the level of risk, the [DFAT](#) minimum standards are to be applied.

- a) Low: Minimum standards 1 - 2
- b) Medium: Minimum standards 1 - 3
- c) High: Minimum standards 1 - 5
- d) Very High: Minimum standards 1 - 7

Staff should consult the [DFAT PSEAH Minimum Standards](#). Staff should also refer directly to the DFAT PSEAH Policy and [DFAT Guidance on Assessing the Risk of SEAH](#).

For recurring OSM activities hosted with existing partners, cyclic annual reviews of risk assessments must be carried out to:

- identify any new or emerging risks; and
- identify significant changes to the context, environment or other factors that may arise; and
- ensure currency, and a comprehensive review.

Following investigation of a reported incident, the University will assess whether remedial action is warranted and has occurred.

5.2. Selection and Agreements for Downstream Partners & Contractors

During the selection process of downstream partners and contractors, Bond University will incorporate risk management processes (in accordance with Clause 5.1), communicate with partners in relation to expectations set out in this Procedure, and exercise due diligence and document evidence of partner organisations' implementation of policies and practices aimed at PSH prior to the commencement of an OSM activity. Where doubt exists regarding whether a partner has measures in place for PSH, Bond University should not proceed with such an agreement.

Agreements specific to DFAT-funded OSM activities are covered in Clause 6.2. Agreements for all other OSM activities are required to adhere to the following process:

1. For all new and existing Institutional Partnership Agreements (refer to Institutional Partnership Policy) and agreements that fall outside the Institutional Partnership Policy (for example, Student Placement

Agreements), prior to committing to further OSM activities, Bond University will undertake a risk management review to ensure compliance with this Procedure.

2. A copy of this Procedure must be provided to downstream partners and contractors prior to agreements being signed and the following text must be incorporated into agreements: *“Under the terms of this agreement, you agree to comply with the Bond University Outbound Student Mobility Prevention of Sexual Harm Procedure.”*

5.3. Pre-departure Documentation

Pre-departure documentation for staff and students will include:

- PSH Training
- Cultural-specific information relevant to the destination country that may relate to SH matters, including in relation to cultural norms regarding reporting
- [Smartraveller - advice for studying overseas](#)
- [DFAT New Colombo Plan Scholars Student Code of Conduct](#) (for NCP Scholars)

5.4. Requirements of Staff and Students

In order to promote a safe and respectful environment and to ensure adherence with expected standards of care, Bond University requires staff and students to meet the following conditions:

- Agree to adhere to all relevant policies and procedures.
- Complete all mandatory pre-departure training.
- Undertake and acknowledge PSH Student & Staff Training.
- Promptly report to Bond University any suspected or known incidents of sexual harm perpetrated by a member of the Bond Community or downstream partner or contractor that have been witnessed, heard about, suspected, or reasonably believed to be at risk of occurring (refer to the section 'Reporting, Supporting and Investigation' below).
- Maintain the confidentiality of reported incidents to assist Bond University to operate in accordance with applicable data protection and privacy laws, including the Bond University Privacy Policy, and with Australia's *Privacy Act 1988 (Cth)*.
- For projects identified as presenting greater potential risk by Bond University, comply with screening requirements, for example, providing relevant Working with [Children](#) Checks or Vulnerable Persons Checks and/or undergoing criminal record or police checks when requested.
- Refrain from engaging in transactional sex and fraternisation in the field while engaged in a Bond University affiliated activity (refer to Sexual Harm Policy).

6. DFAT-RELATED ACTIVITIES

For all OSM activities related to DFAT including but not limited to research and scholarship funding, the University has implemented further mandatory actions that comply with DFAT's PSEAH Policy as outlined in sections 6.1-6.3 and section 7 of this Procedure. Reports of abuse or exploitation of individuals under the age of 18 years while engaged in DFAT-related activities must follow [DFAT's Child Protection Policy](#).

6.1. DFAT PSEAH Principles

Bond University acknowledges the six principles set out in the DFAT PSEAH Policy, which align with the University's own approach to preventing and addressing sexual harm concerns:

- Principle 1:** Zero tolerance of inaction
- Principle 2:** Strong leadership accelerates culture change
- Principle 3:** Victim/survivor needs are prioritised
- Principle 4:** Preventing Sexual Exploitation, Abuse and Harassment is a shared responsibility
- Principle 5:** Gender inequality and other power imbalances are addressed
- Principle 6:** Stronger reporting will enhance accountability and transparency

6.2. Agreements for DFAT-related Activities

Agreements specific to DFAT-funded OSM activities are required to adhere to the following process:

1. For all new and existing Institutional Partnership Agreements (refer to Institutional Partnership Policy) and agreements that fall outside the Institutional Partnership Policy (for example, Student Placement Agreements), prior to committing to further OSM activities, Bond University will undertake a risk management review to ensure compliance with this Procedure and the DFAT PSEAH Policy.
2. A copy of the DFAT PSEAH Policy and this Procedure must be provided to contractors and downstream partners prior to agreements being signed and the following text must be incorporated into all new agreements for DFAT-funded activities: *“Under the terms of this agreement, you agree to comply with the DFAT PSEAH Policy and the Bond University Outbound Student Mobility Prevention of Sexual Harm Procedure.”*

6.3. Working with Contractors and Partners

6.3.1. Selecting Contractors and Partners

6.3.1.1. Contractors

In relation to DFAT-related work, Bond University requires suppliers and contractors to comply with both this Procedure and the DFAT PSEAH Policy as part of their ongoing contractual arrangements. The university is committed to informing existing contractors, who are already involved in DFAT-related work, about the content of this Procedure and the specific PSH commitments it expects them to fulfill.

6.3.1.2. Downstream Partner Organisations

Bond University establishes partnership arrangements only with organisations that provide satisfactory demonstration and assurance of their compliance with the requirements outlined in this Procedure and the DFAT PSEAH Policy. This includes verifying that the partner organisation possesses and implements its own relevant policies and procedures in alignment with this Procedure.

In addition, Bond University undertakes the following actions:

- Advising downstream partner organisations and contractors about the significance of PSH and informing them about the available mechanisms for reporting concerns to the university.
- Encouraging downstream partner organisations and contractors to proactively prevent incidents of sexual harm in their activities involving Bond University and DFAT-related work.
- Notifying downstream partner organisations and contractors of the accessible, anonymous avenues through which they can report any concerns regarding sexual harm to Bond University (refer to the section 'Reporting and responding to concerns' below).

6.3.2. Requirements of Downstream Partner Organisations and Contractors

Contractors and staff engaged by downstream partner organisations engaged in DFAT-related work must:

- Agree, as stipulated in their agreements with Bond University, to adhere to the DFAT PSEAH Policy and this Procedure.
- Undertake and acknowledge PSH Downstream Partner & Contractor Training
- Implement measures aimed at minimising the risk of their staff, downstream partners, or suppliers engaging in sexual harm, in accordance with the DFAT PSEAH Policy.
- Support and comply with all Bond University initiatives focused on preventing sexual harm, including providing training and guidance to their staff, downstream partners, or suppliers.
- Promptly report to Bond University any suspected or known incidents of sexual harm that they witness, hear about, suspect, or reasonably believe to be at risk of occurring to Bond University (refer to the section 'Reporting, Supporting and Investigation' below).
- Maintain the confidentiality of reported incidents to assist Bond University to operate in accordance with applicable data protection and privacy laws, including the Bond University Privacy Policy, and with Australia's *Privacy Act 1988 (Cth)*.
- For projects identified as presenting greater potential risk by Bond University, undergo screening before or during the contract, engagement, or collaboration. This screening wherever practicable may involve providing relevant checks such as Working with Children Checks (or Working with Vulnerable Persons Checks) and/or criminal record checks. In situations where obtaining a reliable foreign criminal record check proves challenging, Bond University may, at its discretion, accept a statutory declaration or a local legal equivalent outlining efforts made to obtain such checks, while disclosing any charges and, if legally permissible, spent convictions related to sexual exploitation, abuse, and harassment.
- Refrain from engaging in transactional sex and fraternisation in the field while engaged in the delivery of OSM activities (refer to DFAT PSEAH Policy for further information).

6.3.3. Downstream Partner Organisations & Contractor Training

- PSH Training Booklet & Acknowledgment (for Downstream Partners & Contractors)

6.4. Compliance Checks by DFAT

DFAT will monitor compliance of its PSEAH Policy through a range of approaches including performance assessments, reviews, non-government organisation accreditation processes and due diligence checks. DFAT Partner organisations such as Bond University are expected to put in place appropriate risk-based measures to ensure they and their suppliers comply. Non-compliance with requirements may lead to DFAT suspending or terminating an agreement with Bond University.

7. REPORTING, SUPPORTING & INVESTIGATING

7.1. Reporting Concerns or Incidents

To report a concern or incident of sexual harm to Bond University

Report via [BondCare](#).

For DFAT-related activities

Reports can also be made directly to DFAT using the [DFAT SEAH Incident Notification Form](#).

Email: seah.reports@dfat.gov.au

Phone: +61 2 6178 5100

To report a breach of the DFAT PSEAH Policy to the University

Email: integrity@bond.edu.au

For DFAT-related activities, the University will adhere to the reporting requirements as delineated in the [DFAT PSEAH Policy](#) in the following manner:

Mandatory and Immediate (within two working days upon becoming aware of an alleged incident)

- Any alleged incident of sexual harm pertaining to the execution of DFAT-related business, including incidents that entail a significant risk to the reputation of DFAT.

Mandatory (within five working days)

- Instances of noncompliance with DFAT PSEAH Policy

Reporting to Local Law Enforcement

In line with the expectations outlined in the DFAT PSEAH Policy, where safe to do so, and when in accordance with the wishes of the victims/survivors and whistleblowers, all alleged sexual harm incidents that involve a criminal aspect should be reported through the correct local law enforcement channels. To protect the privacy of alleged perpetrators, victims/survivors, and whistleblowers, information provided to Bond University and DFAT will be handled in accordance with the *Privacy Act 1988 (Cth)*.

7.2. Supporting and Investigating Concerns or Incidents

The support and investigation of sexual harm matters will be undertaken consistent with the University's Sexual Harm Policy and the respective staff or student code of conduct.

7.3. Reporting possible breach of the DFAT PSEAH Policy

Concerns regarding a breach of the DFAT PSEAH Policy will be undertaken consistent with that policy.

8. DEFINITIONS, TERMS, ACRONYMS

Child/Children	In accordance with the United Nations Convention of the Rights of the Child, 'child' means every human being under the age of 18 unless under the law applicable to the child, majority is attained earlier. For the purposes of this Procedure, Bond University considers a child to be a person under the age of 18 years
DFAT	Department of Foreign Affairs and Trade
Downstream Partner	Suppliers, contractors, agents, and any other entity or their personnel engaged by a DFAT Partner to perform DFAT business
PSH	Prevention of Sexual Harm
SEAH	Sexual Exploitation, Abuse & Harassment as outlined in the DFAT PSEAH Policy. Bond University considers that the terms sexual exploitation, sexual abuse, and sexual harassment fall under the broader definition of sexual harm as outlined in the Sexual Harm Policy.
Sexual Harm	Refer to Bond University's Sexual Harm Policy

9. RELATED DOCUMENTS

9.1. Internal

[Appendix A: DFAT PSEAH Minimum Standards](#)

[Risk Management Assessment \(RMA\) Template](#)

[Sexual Harm Policy SS 5.8.3](#)

[Student Travel Policy GOV 1.7.1](#)

[Student Critical Incident Management Policy SS 5.8.8](#)

[Risk Management Policy GOV 1.6.1](#)

[Work Health & Safety Policy GOV 1.9.2](#)

[Working with Children Policy GOV 1.8.1](#)

[Information Security Policy INF 6.5.3](#)

[Institutional Partnerships Policy ICE 9.4.1](#)

[Student Code of Conduct Policy SS 5.2.1](#)

[Student Wellbeing and Safety Policy SS 5.8.4](#)

[Higher Degree by Research Student Support Policy RES 4.4.1](#)
[Code of Conduct Policy HR 2.8.4 \(staff\)](#)
[Staff Travel Policy FIN 7.5.3](#)
[Professional Staff Workplace Investigation Policy HR 2.8.5](#)
[Academic Staff Workplace Investigation Policy HR 2.8.8](#)
[Higher Degree by Research Student Supervision Policy RES 4.4.3](#)

9.2. External

[Preventing Sexual Exploitation, Abuse and Harassment Policy](#) ('DFAT PSEAH Policy')
[DFAT Guidance on Assessing the Risk of SEAH](#)
[DFAT's Child Protection Policy](#)
[New Colombo Plan – Student Code of Conduct](#)
[TEQSA Preventing and responding to sexual assault and sexual harassment in the Australian higher education sector](#)
[Smartraveller](#) - advice for studying overseas

10. MODIFICATION HISTORY

Date	Sections	Source	Details
6 February 2024			Date first approved

APPENDIX A: DFAT PSEAH MINIMUM STANDARDS

Minimum standard	Obligation		Applies to			
	Organisations	Individuals	Low Risk	Med Risk	High Risk	Very High Risk
1. Have a PSEAH policy or other documented policies and procedures in place and clearly communicate expectations of this Policy.	Must have a PSEAH policy or other documented policies and procedures in place, which clearly meet the expectations of this Policy.	Sign a document outlining appropriate and enforceable standards of conduct, compliant with the requirements of this Policy	✓	✓	✓	✓
2. Have reporting and investigation procedures in place.	The PSEAH policy, or equivalent, documents how SEAH incidents will be managed, reported and investigated. Reporting and investigation processes must include engagement of and reporting to senior management and executive boards	Through a document which outlines appropriate and enforceable standards of conduct, confirm awareness of DFAT's PSEAH reporting requirements for concerns or incidents and policy non-compliance.	✓	✓	✓	✓
3. Have risk management processes that include the risk of SEAH.	Have effective risk management processes that include consideration of the risk of SEAH. The process must document the controls already in place or to be implemented to reduce or remove risks.	Must meet the reporting requirements under their agreement, aligned to DFAT's PSEAH Policy.	✗	✓	✓	✓
4. Effective PSEAH training in place.	PSEAH training for personnel, including downstream partners and individuals that deliver DFAT business.	Complete PSEAH training and provide evidence of this.	✗	✗	✓	✓
5. Recruitment and screening processes and employment practices address and manage the risk of SEAH.	Can demonstrate robust PSEAH recruitment and screening processes for all personnel/ consultants including having in place appropriate and enforceable standards of conduct.	Based on a risk assessment, assurances could include providing a recent police check, working with vulnerable people check or location specific equivalent that provides assurance reasonable SEAH precautions have been taken. Local requirements must also be followed.	✗	✗	✓	✓
6. Prohibit transactional sex for all personnel, while engaged in the direct delivery of DFAT business	Prohibits transactional sex in the field for all staff and downstream partners while engaged in the delivery of DFAT business.	Employment agreements include clauses prohibiting transactional sex while engaged in the delivery of DFAT business.	✗	✗	✗	✓
7. Prohibit fraternisation for all nonnational personnel, while engaged in the direct delivery of the DFAT business	Prohibits fraternisation for all non-national personnel in the field while engaged in the delivery of DFAT business.	Employment agreements include clauses prohibiting fraternisation for all nonnational individuals while engaged in the delivery of DFAT business	✗	✗	✗	✓