



## **CHILD PROTECTION POLICY**

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**Next review: 2018**

## 1. INTRODUCTION

The Australian Himalayan Foundation (AHF) aims to help those most in need achieve their goals through integrated improvements in education, health and the environment (including adaptation to climate change). Through assistance with administration, project management, training and monitoring, the Foundation ensures that local communities are empowered and equipped to manage and implement projects sustainably and inclusively. AHF recognises that children are part of every community in which it works. As such this *Child Protection Policy (CPP)* has been developed to integrate child protection within the Foundation's organisational structure to help protect the rights of children in the Himalaya region. Definitions used in this Policy are summarised at [Annex A](#).

AHF is committed to upholding the rights enshrined in the UN *Convention on the Rights of the Child* (particularly Article 19). This states that all children, wherever they may live and whatever may be their circumstances, have the right to be protected, nurtured and to be free from all forms of violence, abuse, neglect, maltreatment and exploitation. Under this CPP, AHF will act to ensure a child-safe environment is maintained by providing the safest possible programs and environments for children, and identifying and managing risks that may lead to harm. AHF adheres to local and international child protection laws in relation to all forms of child abuse and child exploitation including child sex tourism, child sex trafficking, child labour and child pornography. This CPP is also consistent with the *Child Protection Policy of the Australian Department of Foreign Affairs and Trade* (June 2014).

This CPP outlines a range of management strategies that will reduce the risk of children being harmed. The Policy will be used to educate AHF staff and others about child abuse and promoting a child-safe culture where the concerns for the safety of a child will be raised and managed in a fair manner. It provides guidance on how to work respectfully and effectively with children and how to respond to concerns about child abuse. It also promotes the safety and well-being of children accessing AHF's services and programs.

## 2. GOAL AND OBJECTIVE

On this basis the **Goal** of the Policy is to: protect children from exploitation and abuse of all kinds in the delivery of AHF programs and activities. The **Objective** of the Policy is to: create and maintain protective environments for children in the delivery of AHF programs and activities.

## 3. GUIDING PRINCIPLES

- AHF believes that any form of child abuse and exploitation is unacceptable and will not be tolerated (i.e. zero tolerance).
- AHF believes that all children have a right to be safe at all times and the Foundation has an obligation to provide safe and protective services and environments.
- AHF recognises its duty of care to take all reasonable steps to ensure that children are safe from harm.
- AHF will take proactive steps to create child-safe and child-friendly programs.
- Adherence to the *Child Protection Policy* is a mandatory requirement for all AHF Board members, staff, volunteers, consultants and in-country partners.

- AHF will ensure that all Board members, staff, volunteers, consultants and in-country partners and other relevant stakeholders are made aware of the Policy and their responsibilities.
- All decisions regarding the welfare and protection of children are made on the 'best interest of the child' principle.

#### 4. CONTEXT

AHF activities directly support the challenges facing children in the Himalaya region. These include:

##### *Nepal:*

- More than 50,000 children die in Nepal each year, with malnutrition as the underlying cause for more than 60 per cent of these deaths.
- Fifteen per cent of Nepal's wells are contaminated by arsenic. Despite Nepal's high overall coverage of accessibility to drinking water, access to improved water for deprived, disadvantaged communities and conflict-affected rural and fringe urban areas remains low.
- Two-thirds of Nepalis are still without access to toilets.
- Conflict in the past decade has had a significant impact on education. Forced closures of schools due to strikes have cut the school year in half in some areas. Teachers have been threatened, assaulted and even killed. Thousands of students have been taken from school for political indoctrination, and some have been recruited into the Maoist forces or militia.

##### *Bhutan:*

- Many rural children have been left behind by migrating parents, or have been sent by themselves into urban areas for education.
- Although primary school enrolment has risen steadily in recent years, Bhutan continues to lag behind other South Asian nations.
- Basic education is free but not compulsory.
- A quarter of all children ages ten to fourteen are working. Many toil for long hours as domestic workers, earning minimal wages, and are vulnerable to physical and sexual abuse by their employers.

##### *Ladakh (Northern India):*

- Infant mortality remains as high as 63 deaths per 1,000 live births. However, in the remote region of Zaskar, where medical services are almost non-existent, the rate of child mortality can be as high as 50%.
- Around half of all children under the age of three are too small for their age. Many of these children are severely malnourished.
- Diarrhea remains the second major cause of death among children, after respiratory tract infections. Unhygienic practices and unsafe drinking water are some of the main causes.
- 20 per cent of children aged 6 to 14 are still not in school due to ongoing issues of 'social distance' arising out of caste, class and gender differences deny children equal opportunities.
- High rates of child labourers under the age of 14.
- Children's exposure to violations of their rights range from child labour, child trafficking, to commercial sexual exploitation and many other forms of violence and

abuse. For children who have been trafficked and rescued, opportunities for rehabilitation remain scarce and reintegration process arduous.

- Children in need of special protection mainly belong to communities suffering disadvantage and social exclusion such as scheduled castes and tribes, and the poor.

AHF's *Strategic Plan 2015-2020* responds to these challenges through goals to: increase education levels; improve health outcomes; improve environmental management and adaptation to climate change; and integrate community development to enhance multi-sectoral efforts to improve access to services and income earning opportunities in isolated communities. A specific goal aims to strengthen gender equality and social inclusion. This involves development of specific approaches for strengthening the inclusion of girls and women, the most vulnerable young people in communities, and people with disabilities (including children).

## **5. SCOPE OF THE POLICY**

This Policy applies to all AHF Board members, staff, volunteers, consultants, in-country partners and other key groups. Where appropriate, these personnel are required to accept and sign the CPP *Code of Conduct* as part of their involvement with AHF (see below).

## **6. CHILD PROTECTION RISK MANAGEMENT**

- AHF recognises that there are a number of potential risks to children in the delivery of its programs. AHF assesses and manages these risks by examining projects, personnel, and in-country delivery partners and their potential impact on children. The Foundation is continually mindful of potential risks as children are part of every community. New activities that involve direct work with children will be considered a higher risk and will therefore require more stringent child protection procedures.
- Risk management is an ongoing part of every activity and AHF assesses child protection issues on each new area of work.
- AHF staff and others have a responsibility to be continually aware of risks and to actively minimise opportunities and situations where children can be harmed.
- Specific child protection risk management approaches are outlined at [Annex C](#).

## **7. CODE OF CONDUCT FOR WORKING WITH CHILDREN**

AHF staff and others are expected to conduct themselves in a manner consistent with their role as an AHF representative and abide by the following child-safe Code of Conduct guidelines (refer to [Annex B](#) for full CPP *Code of Conduct* agreement and signature):

- Treat children with respect regardless of race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not engage children in any form of sexual activity or acts, including paying for sexual services or acts.
- Wherever possible, ensure that another adult is present when working in the proximity of children.
- Not invite unaccompanied children into home, unless they are at immediate risk of injury or in physical danger.

- Not sleep close to unsupervised children unless absolutely necessary, in which case, obtain supervisor's permission and ensure that another adult is present if possible.
- Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any medium.
- Refrain from physical punishment or discipline of children.
- Refrain from hiring children for domestic or other labour that is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.
- Comply with all relevant Australian and local legislation, including labour laws in relation to child labour.
- Immediately report concerns or allegations of child abuse in accordance with appropriate procedures.

## **8. USE OF CHILDREN'S IMAGES**

AHF will at all times portray children in a respectful, appropriate and consensual way. Guidelines on the use of children's images are:

- A child should always be portrayed in a dignified and respectful manner, adequately clothed and not in poses that could be seen as sexually exploitative.
- A child and their family must always be asked for consent when using their images with details given on how and where the image will be used.
- There should be no identifying information of the child used in the publication or images with their location.
- Children should be portrayed positively as part of their community.
- Local cultural traditions should be assessed regarding restrictions for reproducing personal images.
- Images should be an honest representation of the context and the facts.
- When sending images electronically file labels should not reveal identifying information.
- All photographers will be screened for their suitability, including police checks where appropriate.

## **9. ENGAGEMENT OF STAFF, VOLUNTEERS AND CONSULTANTS**

AHF is committed to child safe recruitment, selection and screening processes to ensure recruitment of the safest and most suitable people to work in our projects. These processes include:

- Promoting the Foundation's child-safe commitment in promotional materials and in job advertisements.
- All applicants will receive a copy of this CPP and be informed of screening requirements.
- Applicants will be required to submit a detailed application form when applying for a position with AHF, including information on dates and places of previous employment, education and other activities.

- All positions will be assessed for the level of risk in relation to contact with children - those working directly with children will require *Working with Children* screening and must possess relevant qualifications and experience in working with children.
- Job descriptions are required for all positions that describe key selection criteria and outline tasks and accountabilities.
- Interviews will be conducted for all positions, ideally face-to-face.
- Behavioural-based questions used for positions working directly with children will explore the candidate's motivation, attitudes to children, professional boundaries, accountability, teamwork and how they have responded to ethical dilemmas.
- A minimum of two reference checks will be required for all preferred candidates including the most recent employer/supervisor with verification and direct contact and right to request additional referees.
- Staff and others may be required to provide proof of identity including original birth certificates, passports, driver's license and relevant qualifications.
- All positions are subject to a probationary period depending on the length of contract. Issues relating to child protection will be included in staff performance reviews.
- Staff and others visiting AHF projects will be required to read and sign AHF's CPP and *Code of Conduct*.
- AHF reserves the right to refuse employment or terminate employment of any person that may pose a risk to children.

## **10. CHILD ABUSE REPORTING PROCESSES**

It is mandatory for all AHF staff and others to report concerns or allegations of child abuse. The Foundation will take all concerns and reports of child abuse seriously and act on reports immediately in line with the following procedures:

### *WHO SHOULD REPORT?*

- All AHF staff and others including people in the community and partner organisations.

### *WHAT SHOULD BE REPORTED?*

- Any disclosure or allegation from a child/community member or staff regarding the safety, abuse or exploitation of a child.
- Any observation or concerning behaviour exhibited by an AHF Board member, staff, volunteer, consultant or other relevant stakeholder that breaches AHF's *Code of Conduct* for working with children.
- Inappropriate use of the Foundation's photographic equipment or computers including evidence of child pornography.
- Engagement in suspicious behaviour that could be associated with sexual exploitation or trafficking.

### *WHO TO REPORT TO?*

- The nominated AHF Child Protection Officer (CPO) is the CEO.
- *Overseas*: Child abuse reports should be made to the in-country project manager or project director. If this is not possible reports can be made to the Australian-based CPO who will be guided by local reporting procedures.
- *In Australia*: Child abuse reports should be made to the CPO who will progress matters through relevant criminal jurisdictions if necessary.

- The CPO will immediately notify DFAT’s Child Protection Compliance Section if any DFAT-funded personnel, or DFAT partner personnel, are accused of, charged with, arrested for, or convicted of criminal offences relating to child exploitation and abuse.

*WHEN TO REPORT?*

- Child abuse concerns should be raised immediately.

*HOW SHOULD IT BE REPORTED?*

- Verbally and by completing a formal written report.

*WHAT WILL HAPPEN NEXT?*

- The in-country manager, in consultation with the CPO, will decide on the next steps by either interviewing to gain more information and handling internally if not a criminal matter, while keeping the interest of the child paramount. If a criminal matter, it will be reported to local police or child protection authorities or the Australian Federal Police.
- AHF will treat all concerns raised seriously and ensure that all parties will be treated fairly and professionally within the principles of natural justice.
- AHF will ensure that the interests of anyone reporting child abuse in good faith will be protected. Employees making false or malicious allegations will face disciplinary action.
- Every effort will be made to protect the rights and safety of the child throughout any investigations.
- Children and community members with whom AHF works will be provided with information about how to report any child protection concerns about AHF staff members and others.

*REPORTING AND DISCLOSURE BY A CHILD*

- If a child discloses abuse, he/she must be taken seriously with respect, care and concern.
- If they request that no-one be told of the matter, staff must seek advice from the in-country manager or senior staff member on how the child can be supported and the disclosure process managed.

*OTHER ACTIONS TO TAKE*

- *Protect the child* – Immediate response should be to protect the child from further abuse.
- *Distance the alleged perpetrator* – The best interest of the child may warrant standing down a staff member or volunteer - with full pay to recognise entitlement to just processes.
- *Maintain confidentiality* – All reports will remain confidential as much as possible within the Foundation and released to in-country or Australian authorities on request.

**11. INVOLVING CHILDREN AND YOUNG PEOPLE**

AHF is committed to child and youth participation. Opportunities are provided for children’s views to be heard and incorporated into the Foundation’s policies and programs. They will also be asked for feedback on AHF staff and services.

## **12. EDUCATING THE ORGANISATION**

AHF is committed to educating staff and others on the CPP and how to reduce risks and create child-safe environments. The Foundation will also provide information about child protection to the children and communities in which we work along with processes on how to report abuse if they have concerns about an AHF staff member or other representative of the organisation.

## **13. REVIEW**

AHF's CPP will be formally reviewed every three years to assess its effectiveness, update new activities and relevant legislation, and ensure ongoing commitment to good practice in child protection. The CPO will manage the review and staff will be consulted in the process.

### **Related documents**

AHF Volunteers Policy

AHF Staff Safety and Security Policy

AHF Communications Policy

AHF HR Policy and Procedures Manual

AHF Organisation and Program Risk Management Guidelines

## DEFINITION OF KEY TERMS

- *Duty of care*: responsibility to provide children with an adequate level of protection against harm.
- *Child and young person*: any person under the age of 18 years (unless otherwise under national laws).
- *Child protection*: responsibilities and activities undertaken to prevent children being abused or maltreated.
- *Child abuse*: physical, sexual, emotional, neglect, bullying, child labour and domestic violence.
- *Physical abuse*: when a person purposefully injures or threatens a child or young person.
- *Emotional abuse*: when a child is repeatedly rejected or frightened by threats.
- *Neglect*: persistent failure or the deliberate denial to provide a child with clean water, food, shelter, sanitation, supervision or care.
- *Exploitation*: the use of a child in work or other activities for the benefit of others.
- *Sexual abuse*: when a child or young person is used by an older or bigger child, adolescent or adult for his/her sexual stimulation/gratification.
- *Child sex tourism*: the commercial sexual exploitation of children by men or women who travel from one place to another.
- *Bullying*: the inappropriate use of power by an individual or group with an intent to injure either physically or emotionally.
- *Exposure to domestic violence*: when children and young people witness or experience the chronic domination, coercion, intimidation or victimisation of one person by another by physical, sexual or emotional means.
- *Vulnerable children*: those in institutions, at work, in war or in emergencies.
- *Children in emergencies*: especially vulnerable to abuse exploitation as part of a traumatized and displaced population.

**AHF CHILD PROTECTION CODE OF CONDUCT**

I, *[insert AHF Board member, staff, volunteer, consultant name]*, agree that while involved in AHF-funded aid activities, I will:

- Treat children with respect regardless of race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not engage children in any form of sexual activity or acts, including paying for sexual services or acts.
- Wherever possible, ensure that another adult is present when working in the proximity of children.
- Not invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger.
- Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible.
- Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any medium (see also 'Use of children's images for work related purposes').
- Refrain from physical punishment or discipline of children (excluding my own children).
- Refrain from hiring children for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury
- Comply with all relevant Australian and local legislation, including labour laws in relation to child labour.
- Immediately report concerns or allegations of child abuse in accordance with appropriate procedures.
- Immediately disclose all charges, convictions and other outcomes of an offence, which occurred before or occurs during my association with DFAT that relate to child exploitation and abuse.
- When photographing or filming a child for work related purposes, I must:
  - before photographing or filming a child, assess and endeavour to comply with local traditions or restrictions for reproducing personal images;
  - Before photographing or filming a child, obtain consent from the child or a parent or guardian of the child. As part of this I must explain how the photograph or film will be used;
  - Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive;
  - ensure images are honest representations of the context and the facts; and
  - Ensure file labels do not reveal identifying information about a child when sending images electronically.

I understand that the onus is on me to use common sense and avoid actions or behaviours that could be construed as child abuse when implementing AHF-funded activities.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_

## CHILD PROTECTION RISK MANAGEMENT

AHF is required to identify child protection risks for all AHF-funded programs, partners, volunteers and contractors.

Child protection risks need to be assessed as part of standard risk management processes at design, implementation, monitoring and evaluation – throughout the lifecycle of an activity.

This Guideline assists in establishing the child protection risk context and whether a full child protection risk assessment needs to be undertaken based on the potential risks to children. It is based on DFAT's *Guidance for Establishing the Child protection Risk Context of Organisations and Activities* (June 2014).

There are common risk areas that AHF staff and implementing partners can review to determine whether a more detailed child protection risk assessment needs to be undertaken. These include the likely risk level of the partner organisation and the nature of contact between staff and children that will take place under the activity.

There are three key steps in establishing the child protection risk context:

### 1. DETERMINE THE LEVEL OF CONTACT WITH CHILDREN THE ACTIVITY IS LIKELY TO INVOLVE

<b>CONTACT WITH CHILDREN RISK ASSESSMENT WORKSHEET (No = nil contact)</b>		
<b>Inherent risk</b>	Personnel will be deployed in-country	
	Personnel will be working in a remote and/or rural location	
<b>Degree of Isolation</b>	Involves being alone with children (not frequently enough to be working with children)	
	Involves activities that are away from organisation location	
	Involves meeting one-on-one with children (not frequently enough to be working with children)	
	Involves unpredictable or remote settings	
<b>Online contact or access to personal details</b>	Involves direct one-on-one or group access to children online	
	Involves supervising child-to-child online contact	
	Involves online access to a child's or children's personal and/or confidential information	
	Inadequate/missing safe options for children to report unwanted attention or inappropriate behaviour by others	
	Involves educating children and supporting adults on cyber safety	

<b>Vulnerability of child/children</b>	Engages with children whose true or cognitive age impacts on their ability to protect themselves	
	Engages with children who have challenges that contribute to their vulnerability (e.g. psychological, situational)	
	Engages with children who do not have many support systems	
<b>Degree of physical contact</b>	Involves demonstrating a skill to children	
	Position involves need for physical contact/touching children	
	Involves providing a personal service (e.g. washing, dressing, toileting)	
<b>Degree of monopoly</b>	Monopoly on provision of goods and/or services <ul style="list-style-type: none"> <li>● Medical</li> <li>● Food distribution</li> <li>● Career training (sports/musical)</li> </ul>	
<b>Degree of supervision</b>	Involves personnel having unsupervised contact with children	
	Activities/engagement with children is not observed or monitored	
	insufficient number of trained staff to supervise activities/engagement with children	
<b>Degree of trust</b>	Involves developing close, personal, long term relationships with children	
	Involves transporting youth	
	Involves one or more of the following: One-on-one supervision, overnight supervision, out of town activities, advising or offering guidance to youth or spending extended periods of time with youth e.g. camps	
	Contributes to important decisions regarding the future of children	
<b>Access to Property</b>	Has access to personal/confidential information	
	Adult has a perceived or actual level of authority (from child perspective)	
<b>Skills and knowledge required</b>	Requires specific skills, knowledge, qualifications or service eligibility requirements to undertake a child related position	
<b>Child labour</b>	Possibility that activity will lead to the employment of children	
	Possibility that activity will lead to the removal of children from school	
	Possibility that activity will lead to children being employed in hazardous work	
<b>Vulnerability of parent/carer</b>	Engages with parents whose true or cognitive age impacts on their ability to protect their children	
	Engages with parents who have challenges that contribute to their ability to provide care (e.g. psychological, situational)	
	Engages with parents who do not have many support systems	
<b>Vulnerability can include:</b>	Physical and mental disabilities, homelessness, child sex workers or parents who are sex workers, children and families impacted by disasters, displaced, migrants, refugees and asylum seekers, children	

	in contact with the law, children that have been subject to trafficking, orphans, unaccompanied minors and the very young.	
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## Assessment

Activity Inherent Risk			
<b>LOW</b>	<b>NIL</b>	<b>*</b>	The activity does not involve any individuals working in-country (Nil Contact)
<b>MODERATE</b>	<b>CONTACT</b>	<b>*</b>	The activity involves or may involve contact with children (working in-country, remote or rural area)
<b>HIGH</b>	<b>WORKING</b>	<b>*</b>	The activity involves working with children

## 2. DETERMINE WHETHER THE ORGANISATION IS CHILD-FOCUSED AND WHAT CHILD PROTECTION CONTROLS ARE IN PLACE

### Organisation Level of Contact with Children and Systems in Place

<b>Size of organisation</b>	Number of staff employed by the organisation; either paid or unpaid	
<b>Types of Personnel</b>	Contractors	
	Permanent staff	
	Volunteers	
	Sponsors	
	Other	
<b>Sites</b>	Number of sites operated	
	Proximity of sites to central management	
	Sites are located in unpredictable or remote / rural location	
<b>Child protection policy and procedures <sup>1</sup></b>	Child Protection Policy not in place	
	Recruitment practices, screening not completed for all staff, before commencing work	
	Notifications/Incident reporting procedures not in place	
	Staff do not receive child protection training	

<sup>1</sup> A yes answer would indicate a high risk partner organisation

	Boundaries for appropriate behaviour/code of conduct are missing/inadequate	
	Feedback on staff performance not recorded	
	Inadequate or non-existent record keeping (meetings, activities, incidents, reports, logs, record of complaints)	
	Organisation uses third party service providers without checking if they are child safe	
<b>Types of activities</b>	Does the organisation across all of its operations provide any direct activities/services for children?	
	Does the organisation provide any humanitarian relief?	
	<i>If yes, complete the Working with Children Risk assessment</i>	
<b>Business model/ services provided by organisation <sup>2</sup></b>	Organisation provides Residential/Orphanage/Shelter services	
	Organisation uses a child sponsorship model	
	Organisation allows sponsors to visit with children	
	Organisation is part of a 'voluntourism' <sup>3</sup> program	
	Organisation lacks experience/expertise to implement child related services	
	Organisation uses children and/or images of children as a 'product' for fundraising activities	

### Assessment

Organisation Inherent Risk			
<b>LOW</b>	<b>NO FOCUS</b>	<b>✘</b>	Organisation is not a child-focused organisation
<b>MODERATE</b>	<b>FOCUS &amp; STRONG SYSTEMS</b>	<b>✘</b>	Organisation is a child-focused organisation and has good child protection systems in place
<b>HIGH</b>	<b>FOCUS &amp; POOR SYSTEMS</b>	<b>✘</b>	Organisation is a child-focused organisation and has poor or nil child protection systems in place

### 3. DETERMINE THE POTENTIAL OVERALL CHILD PROTECTION RISK CONTEXT AND WHETHER A FULL CHILD PROTECTION RISK ASSESSMENT IS REQUIRED BASED ON THE OUTCOMES OF THE FIRST TWO STEPS

<sup>2</sup> A yes would indicate that an organisation would require a higher degree of child safeguarding than the minimum detailed in the DFAT Child Protection Policy for the Australian Government's aid program.

<sup>3</sup> Voluntourism is travel that includes volunteering for a charitable cause. Voluntourism is a business model that has been shown to be very high risk to children.

Organisation Level of Contact with Children and Systems in Place	Activity Level of Contact with Children		
	NIL (LOW)	CONTACT (MODERATE)	WORKING (HIGH)
NO FOCUS (LOW)	* No further assessment required	* No further assessment required, monitor for changes	* Full assessment required
FOCUS & STRONG SYSTEMS (MODERATE)	* No further assessment required, monitor for changes	* No further assessment required, monitor for changes	* Full assessment required
FOCUS & POOR SYSTEMS (HIGH)	* Full assessment required	* Full assessment required	* Full assessment required

**4. IDENTIFY WHO COMPLETED THE STEPS ABOVE AND WHEN FULL ASSESSMENT (IF REQUIRED) WILL BE COMPLETED.**