



## Child Protection Policy

### 1. Introduction

Anglican Overseas Aid (AOA) affirms the rights and obligations set out in the United Nations Convention on the Rights of the Child. This includes protecting children from harm, exploitation and abuse. AOA is committed to protecting the safety and wellbeing of children and upholds and employs the Australian Government's zero tolerance of child exploitation and abuse.

Through the identification and management of risks that may lead to harm of children, AOA aims to provide the safest possible environments for any children in the communities with whom it works. AOA mandates child-safe practices both within its own organisation and within those of its partners, to ensure children are experiencing no harm as a result of the organisation's work.

### 2. Purpose and Scope

The purpose of AOA's Child Protection Policy is to:

- Protect children from harm, exploitation and abuse, by adopting a goal of children experiencing 'no harm' as a result of AOA's work, and zero tolerance of non-compliance.
- Explain to all of AOA's implementing partners their obligations and AOA's expectations when it comes to child protection, as well as mandatory requirements to ensure partner compliance.
- Outline AOA's obligations if a breach should occur, as well as how the organisation will afford staff and representatives procedural fairness in the advent of an allegation being received; and
- Have clear internal procedures in place that prevent and deter persons from working with children if they pose an unacceptable risk.

This Child Protection Policy applies to all Board directors, committee members, employees, contractors, consultants, volunteers, interns, partners, supporters and prospective supporters visiting AOA programs, and officers of AOA (collectively, 'AOA People'). Additionally, all of AOA's partners must have contextually relevant Child Protection Policies that uphold and comply with this policy. This policy is further supported and implemented through the processes, policies and procedures outlined in the AOA International Programs Handbook.

### 3. Compliance Frameworks

AOA upholds the UN Convention on the Rights of the Child (1989), in particular Article 19 which states: '*State Parties shall protect the child [1] from all forms of physical and mental violence, injury or abuse, neglect, maltreatment or exploitation, including sexual abuse*'.

As a signatory to the ACFID Code of Conduct and a non-government organisation with full DFAT accreditation, AOA also takes seriously the requirement that we have appropriate policies and procedures to promote the safety and well-being of all children accessing or associated with, our services and programs.

AOA adheres to all relevant laws and legislation in both Australia and foreign countries regarding child abuse and exploitation. This includes the Crimes (Child Sex Tourism) Amendment Act 1994 and the Victorian Child Safe Standards 2016.

#### 4. Definitions

AOA considers a child to be a person under the age of 18 years. AOA's Child Protection Policy relates to the protection of children against mistreatment in the context of any AOA Australian or international program. Mistreatment includes all forms of physical abuse, emotional abuse, sexual abuse and/or neglect.

In this context:

1. **Sexual abuse** signifies forcing or enticing a child to take part in or have any form of association with/exposure to sexual activities, whether or not the child is aware of what is happening. Any sexual activity with a child under the age of 18 is considered misconduct, and a form of sexual abuse.
2. **Physical abuse** means a deliberate physical injury or the wilful or neglectful failure to prevent physical injury or suffering.
3. **Emotional abuse** can be defined as the persistent emotional ill-treatment of a child, thus causing adverse effects on the child's emotional development.
4. **Neglect** refers to the persistent failure to meet a child's physical and/or psychological needs, likely to result in harm to a child's health and development.
5. **Spiritual abuse** can include using faith, religion or spiritual beliefs to control, coerce or abuse a child. This may include public shaming or humiliation, or threats of spiritual consequences for certain behaviours. This may present as intense guilt, anxiety, or fear of Church authority figures.

Indicators of harm can be behavioural or physical. Indicators of harm vary for different types of child abuse and can co-occur with multiple types of child abuse.

#### 5. Guiding Principles

- AOA People are required to report any suspicion of child abuse or exploitation. All allegations will be investigated in a fair and thorough manner. AOA believes in an open and transparent reporting process that fairly protects all those involved until a satisfactory resolution is reached.
- When interviewing and reporting on children special attention is to be paid to each child's right to privacy and confidentiality, to have their opinions heard, to participate in decisions affecting them and to be protected from potential or actual harm and retribution.
- The best interests of each child are to be protected over any other consideration, including over cultural practices, advocacy for children's issues and the promotion of child rights.
- AOA is committed to providing equal protection to all children and will protect all children regardless of their nationality, culture, ethnicity, gender, religious or political beliefs, socio-economic status, family or criminal background or physical or mental health.
- AOA People commit to build an environment which aims to 'do no harm' and which promotes the implementation of the AOA Code of Conduct (CoC). Managers have a particular responsibility to affirm this environment.
- Policy non-compliance and/or breach of the CoC is a serious matter that may give rise to disciplinary action including suspension, dismissal or legal action.

#### 6. Implementation and Application

##### 6.1 Risk Management Framework

Abuse and/or neglect causes harm to a child's well-being. AOA affirms its commitment to oppose all forms of child abuse and to continuously strengthen its child protection processes to mitigate the risk of abuse within its programs. AOA commits to implementing a comprehensive risk management approach to child protection through:

1. Employing a zero tolerance approach to child exploitation and abuse.
2. Advocating for the protection of children from all forms of exploitation, especially sexual exploitation.
3. Continuously developing, implementing and reviewing guidelines and practices that support the protection of children.

4. Networking with other Non-Government Organisations and domestic agencies for the purpose of increasing awareness and support for the protection of children.
5. Applying Child Protection Policy and Procedures equally in all situations, whether emergency or development.
6. Being vigilant in protecting confidential information about children and their families in AOA-funded projects and preventing unauthorised direct contact with children.
7. Using images and personal information for promotion, fundraising and development education which ensures the privacy and safeguarding of children. AOA People commit to obtain informed consent from children and their care giver/guardian before photographing or filming a child. All media taken of children must ensure the children are represented in a dignified, respectful manner. Images should be honest representations of the context and the facts and should not reveal identifying information about a child (including in file labels or text descriptions).
8. Sharing responsibility for child protection with implementing partners and ensuring partners have their own compliant policies in place and sufficient capacity for effective implementation.
9. Recognising the best interests of the child and demonstrating our responsibility to and respect for children through sensitivity in our communications that involve them in accordance with the ACFID Code.
10. Ensuring thorough recruitment and screening processes, which include a criminal record check and a Working With Children Check, targeted interview questions and verbal referee checks, prior to the engagement of all staff and volunteers through AOA.
11. Screening and providing orientation information to all individuals and groups visiting projects funded by AOA, including AOA People.
12. Providing mandatory annual Child Protection training for all AOA staff and mandatory biennial training for all Board members. CP training during induction and prior to deployment on first field visit is mandatory. AOA will work with partners to contextualise training for their location.
13. Working with partners to contextualise training for their location and providing partners with access to safeguarding training annually.
14. Not permitting a person to work with or visit children if they pose an unacceptable risk to children's safety or well-being.
15. Including a provision in all employment contracts that AOA reserves the right to dismiss the employee or volunteer should they breach AOA's Code of Conduct.
16. Ensuring that all allegations of child mistreatment or abuse, including any alleged breach of the CoC or Child Protection policy non-compliance by AOA personnel in Australia or during field visits, will trigger an investigation. Personnel under investigation may be suspended or transferred to other duties during an investigation. All investigations will be undertaken by an independent, external investigator.
17. Using fair and proper processes and procedures when making decisions that affect a person's rights, interests and reputation.
18. Monitoring internal and external compliance with this policy and conducting a comprehensive review at least every five (5) years.

#### Program Design and Implementation

- AOA commits to mainstreaming protection and safeguarding throughout the project cycle and to develop 'specialised' activities, where required.
- In collaboration with partners, AOA will develop contextual risk assessments, including identifying Child Protection and Child Safeguarding risks, classifying inherent risks and developing mitigation strategies to reduce or remove risks. Risk assessments and mitigation strategies are subject to ongoing review, adaptation and effective risk management strategies.

- AOA will undertake policy audits of implementing partners' Child Protection policies and practices, to ensure policies and codes of conduct meet DFAT Child Protection minimum standards, maintaining a continuous reflection and learning practice.
- AOA will undertake periodic assessments of its own and partners' Child Protection and Child Safeguarding practices. The collaborative process is a systematic assessment of Child Protection and Child Safeguarding culture, practice, and the quality of policy implementation.

## 6.2 Code of Conduct

The AOA Code of Conduct (CoC) is one of the core elements of our policy to protect children and applies to interaction with all people under the age of 18 years. The CoC clearly defines standards, rights and responsibilities of all stakeholders.

AOA's CoC follows a threefold approach of protecting:

1. Children from abuse,
2. All parties against false allegations, and
3. AOA against falling victim to infiltration by offenders.

Consequently, the CoC states those behaviours which are acceptable and those which are not when working or associating with children. AOA People and partners implementing AOA-funded activities must sign the CoC (or a suitable local equivalent).

## 6.3 Reporting

It is mandatory for AOA People to immediately report concerns, suspicions or allegations of child mistreatment or abuse, including any alleged breach of the CoC or Child Protection policy non-compliance. Concerns may relate to a child or representative associated with the organisation or external to AOA's programs.

In Australia, reports should be made in person or by writing to either the AOA CEO, AOA Board Chair, the Safeguarding Focal Point, or for personnel working at the AOA office, reports can be placed in the AOA Safeguarding Letter Box. Note the Safeguarding Letter Box or mail options can allow the reporter to remain anonymous to AOA.

Overseas reports should be made in writing or via phone to either the AOA International Program Manager, AOA CEO or AOA Board Chair. Note mail and phone options can allow the reporter to remain anonymous to AOA. AOA will ensure the partner's complaints handling system is activated upon receipt of the allegation or report, with regular updates from the partner on the investigation process and outcome to ensure consistency with AOA's due processes and complaint handling principles.

### Key Contacts

- Phone: Toll free number (within Australia): 1800 249 880, telephone: (03) 9495 6100 (+61 3 9495 6100 outside Australia) and ask for the Safeguarding Focal Point, AOA CEO or AOA Board Chair
- Physical address: 4 Bloomburg St, Abbotsford, VIC, 3067, Australia
- Postal address: Anglican Overseas Aid, PO Box 389, Abbotsford, VIC 3067, Australia
- AOA's dedicated safeguarding email address: [complaints@anglicanoverseasaid.org.au](mailto:complaints@anglicanoverseasaid.org.au)
- Online: <https://anglicanoverseasaid.org.au>

The GOV 8A Complaints and Incident Reporting Form can be accessed and used to make a report. The purpose of the Report Form is to report all complaints to assess and determine the next course of action. An anonymous complaint will be accepted; however, AOA encourages complainants to disclose their identity in order for a thorough investigation to be undertaken.

Any person making such a report should NOT:

- Notify the person to whom the claim or allegation relates,
- Seek to independently investigate or substantiate the claim prior to making any notification.

#### **6.4 Response to Reports**

When there are concerns a child is in immediate danger, AOA People in Australia should call the local police immediately. For AOA People stationed overseas, they should contact either the AOA International Program Manager, AOA CEO or AOA Board Chair.

Should AOA receive information to suggest that a child has been harmed, or is at risk of harm, AOA will respond in a professional manner. AOA will prioritise the safety and wellbeing of children at all times, and will consider diverse traits of the children and young people involved.

All AOA People must create and keep records of all complaints, concerns, safety incidents, disclosures, decisions and of all action taken in relation to a child safety complaint or disclosure.

AOA will appoint an investigator to investigate any allegations of child abuse and harm made against members of its organisation. AOA may also appoint an investigator to investigate misconduct and breaches of this policy or related policies (e.g. the Code of Conduct). Investigations will be conducted in accordance with procedural fairness and ensure the safety and wellbeing of children is the priority.

AOA will cooperate with law enforcement and relevant authorities as required.

AOA will make every effort to keep investigations confidential and protect individuals' privacy.