



## Child Protection

### 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 a zero tolerance approach to child exploitation and abuse.

Through identifying and managing risks that may lead to harm of children, AOA aims to provide the safest possible environments for any children when interacting with our programs. AOA mandates child-safe practices within its own organisation and requires its partners to meet these standards, to minimise the risk of children experiencing 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 'AOA People' their obligations and AOA's expectations when it comes to child protection, as well as mandatory requirements to support 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 event 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 and project teams, supporters and prospective supporters visiting AOA programs, and officers of AOA (collectively, "AOA People"). Additionally, all of AOA's international program partners must have contextually relevant Child Protection Policies that uphold and comply with this policy. This policy is further supported and implemented through the 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 Australia regarding child abuse and exploitation. This includes the Crimes (Child Sex Tourism) Amendment Act 1994 and the Victorian Child Safe Standards 2016. Our International Program Partners must comply with their local legislation, regulations and policies.

#### 4. Guiding Principles

- AOA has zero tolerance for acts of child exploitation, abuse and harm and zero tolerance for inaction to prevent, report or respond to child exploitation, abuse and harm.
- Reporting is mandatory for AOA People. AOA People are required to immediately report any child protection concerns. All allegations will be investigated in a fair and thorough manner. AOA believes in a clear, accessible (including to children), confidential and transparent reporting process that fairly protects all those involved until a satisfactory resolution is reached.
- When working or speaking with children, special attention is to be paid to each child's right to privacy and confidentiality, their specific circumstances, to have their opinions heard, and 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 prioritised over any other consideration, including over cultural practices, advocacy for children's issues and the promotion of child rights, safety and well-being.
- Responses to incidents must be trauma-informed, child-centred and enable access to support services.
- AOA is committed to providing equal protection to all children and will protect all children regardless of their circumstances, abilities, nationality, culture, ethnicity, race, sex, gender, sexual orientation, age, religious or political beliefs, socio-economic status, displacement, family or criminal background or physical or mental health.
- AOA People will prioritise prevention and commit to building an environment which aims to 'do no harm' and which promotes the implementation of the AOA Code of Conduct (CoC). Executive Leadership have a particular responsibility to affirm this environment.
- AOA will embed actions to protect children in policies, programs, recruitment, staff training and daily operations to minimise risks and protect children in both physical and online spaces.
- AOA adopts a participatory approach to empower children to understand their rights, express concerns, and participate in decisions affecting them in age-appropriate, voluntary and safe ways. Families and communities are partners in promoting child safety and wellbeing, fostering trust and enhancing collaboration.
- AOA is committed to building a strong safeguarding culture and will embed child protection in governance, leadership and institutional culture with clear accountability, leadership commitment, investment of resources and continuous review and improvement of policies and practices.
- 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.

#### 5. Implementation and Application

##### 5.1 Risk Management Framework

Abuse and/or neglect cause harm to a child's wellbeing. 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 all AOA's work. AOA will adopt a risk-based approach that is proportionate to risk and expected level of contact with children, per the table below<sup>1</sup>. In most cases at least essential standards will apply. It is anticipated that no contact with children will be a rare occurrence.

Level of Contact	Definition	Child Protection Standards Required <sup>2</sup>
No contact with children	Activities with no anticipated interaction with children	None
Incidental or minimal contact with children	Activities where interaction with children is limited, indirect or incidental	Essential Standards
Direct, sustained or significant contact with children	Activities involving regular or ongoing interaction with children	Comprehensive Standards

AOA recognises that child protection risks could be increased based on contextual factors. Safeguarding risks assessments will therefore include an evaluation of factors, including but not limited to:

- The inherent risks of the location
- Whether the activity requires being alone with children without supervision
- The nature of the activities delivered by the program, including any online contact with children
- Whether children are in situations of vulnerability, e.g. children with disabilities, unaccompanied minors, families impacted by disaster
- Whether physical contact with children is required
- The number of suitably trained staff
- The possibility of the activity leading to child labour or removal from school
- The organisational capability of the partner

Other risk management actions include:

1. Advocating for the protection of children from all forms of exploitation, especially sexual exploitation.
2. Continuously developing, implementing and reviewing guidelines and practices that support the protection of children.
3. Networking with other Non-Government Organisations and domestic agencies for the purpose of increasing awareness and support for the protection of children.
4. Applying Child Protection Policy and Procedures in all situations, whether emergency or development.
5. Being vigilant in protecting confidential information about children and their families in AOA-funded projects and preventing unauthorised direct contact with children.
6. Using images and personal information for promotion, fundraising and development education, which ensures the privacy and safeguarding of children. AOA People commit to obtaining informed consent from children and their parent, carer or adult advocate before photographing or filming a child. All media taken of children must ensure that they are represented in a dignified and 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).
7. Sharing responsibility for child protection with implementing partners and ensuring partners have their own compliant policies in place and sufficient capacity for effective implementation.
8. 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

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<sup>1</sup> DFAT Child Protection Policy September 2025

<sup>2</sup> Refer to Appendix for more detail about the Essential and Comprehensive Standards

Code.

9. Ensuring thorough recruitment and screening processes, which include child safe messaging in job advertisements, a criminal record check (or suitable alternative, e.g. a statutory declaration) for each country in which the applicant has lived for 12 months or longer over the past 5 years, and for the country/s of citizenship, a Working With Children Check, targeted interview questions and two verbal referee checks, prior to the engagement of all staff and volunteers through AOA.
10. Screening and providing orientation information to all individuals and groups visiting projects funded by AOA, including AOA People.
11. Requiring all AOA People to sign the AOA Code of Conduct
12. Providing mandatory annual basic child protection training for all AOA staff and mandatory training for all Board members every 2 years. CP training during induction and prior to deployment on the first field visit is mandatory. Comprehensive training will be provided in contexts assessed as high risk.
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 a risk to children's safety or wellbeing.

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.

## *5.2 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 Essential or Comprehensive standards (in accordance with risk assessment), 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.

## *5.3 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 and is aligned with the expectations of DFAT's Child Protection Policy.

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 including all partners and project teams, regardless of their level of contact with children, who are implementing AOA-funded activities must sign the CoC (or a suitable local equivalent).

## *5.4 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.

AOA is committed to ensuring that reporting options are well-publicised and accessible for people of different ages, abilities, identities, and contexts. AOA will work with partners to support the implementation of reporting mechanisms that are physically accessible, culturally safe and age-appropriate.

In Australia, reports should be made verbally or in writing to either the AOA CEO, the AOA Board Chair, or the Safeguarding Focal Point. For personnel working at the AOA office, reports can be placed in the AOA Safeguarding Letter Box. Note that 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 Head of International Programs, AOA CEO or AOA Board Chair. Note that 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: 146 Hoddle Street Abbotsford VIC 3067 Australia
- Postal address: Anglican Overseas Aid, PO Box 1339, Fitzroy North, VIC 3068, 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 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 so that a thorough investigation can be undertaken.

Alternatively, reports can be made in accordance with the HR 6 Whistleblowing Policy which is available on AOA's staff intranet and published on the AOA website.

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.

### 5.5 Response to Reports

If the allegation relates to a DFAT-funded program, AOA will immediately (within 24 hours) report any suspected, alleged or known incidents of child exploitation, abuse or harm to DFAT via [childprotection@dfat.gov.au](mailto:childprotection@dfat.gov.au) using the [DFAT Child Incident Notification Form](#).

When there are concerns a child is in immediate danger, AOA People in Australia should call the local police immediately. AOA People stationed overseas 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 survivor centric, timely and supportive manner. AOA will prioritise the safety and wellbeing of children at all times and will consider the diverse needs and 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 actions taken in relation to a child safety complaint or disclosure. Access to these records will be limited to maintain confidentiality and protect the identity of child victim-survivors and alleged perpetrators.

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 prioritise the safety and wellbeing of children, use traumainformed responses and be conducted in accordance with procedural fairness.

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

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

## 6. 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. Child harm can be perpetrated against participants of AOA programs, community members, and against citizens and non-citizens.

- **Abuse:** In this context, abuse includes a child or children experiencing abuse or witnessing any of the following types of abuse against another child or adult:

- **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.
  - **Physical abuse** means a deliberate physical injury or the willful or neglectful failure to prevent physical injury or suffering.
  - **Emotional abuse** is defined as the persistent emotional ill-treatment of a child, thus causing adverse effects on the child's emotional development. ○ **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.
  - **Spiritual abuse** Spiritual abuse is any attempt to use religion, faith or beliefs to exert power and control over someone. It can involve someone forcing you or your children to join spiritual or religious practices when you don't want to. It can also involve someone stopping you from taking part in spiritual or religious practices that you want to participate in. It is a type of emotional abuse and coercive control..<sup>1</sup>
  - **Online or digital abuse** refers to any form of sexual abuse of a child that has a link to the online, digital or AI environment including: sexually explicit content, threats to share a sexualised image or video, livestreamed sexualised activities or online sexualised conversations, grooming behaviours aimed at making a child feel comfortable about sexual contact, sexual extortion, webcam monitoring for sexual gratification of a child in private settings.
- **Child Protection** relates to external, community-based activities conducted to prevent and respond to child protection issues in the communities in which we work. This also relates to grooming behaviours aimed at making a child feel comfortable about sexual contact and sexual extortion. Examples include strengthening community systems, preventing child labour or child trafficking, promoting online safety, creating child safe spaces in humanitarian response or development activities, and education on child rights.
  - **Child Safeguarding** are the internal and organisational systems, policies and practices that we have in place to ensure that AOA and AOA People do not harm to children who come into contact with our programs. This includes our Code of Conduct, risk assessments, reporting mechanisms, recruitment and screening processes, induction and training, and safeguarding focal points
  - **Child Victim-survivor** describes a person under the age of 18 who is, or has been, abused, exploited or harmed. 'Victim-survivor' acknowledges both the harm suffered (victim) and the resilience or agency of the child in coping with the aftermath (survivor). This term emphasises a supportive, rights-based approach to addressing their needs and upholding their dignity throughout the reporting and response process. Indicators of harm can be behavioural or physical. Indicators of harm vary for different types of child abuse

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and can co-occur with multiple types of child abuse.

- **Contact with children** is defined as:
  - **No contact with children** could include office-based roles, one-off delivery of equipment or materials, provision of a service or a trade, e.g. catering, IT, repair of equipment.
  - **Incidental or minimal contact with children** can occur in activities where the activity focuses solely on adults, but in a setting where children may be present e.g. a community setting, a hospital, or a school, so incidental contact is possible. This could also include the delivery of services in contexts where children may be present under the supervision of parents/carers, e.g. food service.
  - **Direct, sustained, or significant contact with children** can occur in any activity conducted in child spaces or child residential settings. Could also occur in one off or ongoing activities involving children where individuals may be in a position of trust, influence, supervision, or authority over children. E.g.,

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<sup>1</sup> Sourced from [Spiritual abuse | 1800RESPECT](#), accessed 10/10/2025

teachers or volunteers delivering regular lessons, health care workers providing services to children, conducting interviews with children or collecting stories and images of children, and sports coaches or arts facilitators.

- **Harm** refers to any detrimental effect on a child's physical, psychological or emotional wellbeing. Harm may be caused by financial, physical or emotional abuse, neglect, and/or sexual abuse or exploitation, whether intended or unintended.
- **Mainstreaming** refers to the process of integrating child safeguarding principles and practices into our humanitarian and development programs so that our work is delivered in a way that prioritises safety and aims to do no harm.

## 7. Review

This policy and related procedures will be reviewed every three years and no later than October 2028, by the CEO and International Programs staff.