

## Safeguarding Policy

**Important:** To make a report about a breach of our Safeguarding Policy or Child Protection Code of Conduct, please contact us on [1300 302 663](tel:1300302663) (within Australia) or [+61\(0\)2 9264 1021](tel:+61(0)292641021) (international) or send an email to [complaints@abmission.org.au](mailto:complaints@abmission.org.au) or follow the instructions here <https://www.abmission.org/feedback-and-complaints/>.

ABM and AID take seriously our responsibility to *Safeguard* all *Children*, and adults with whom we come into contact, either as *Workplace Participants*, *Supporters*, *Partners* or as members of the communities with whom we work.

### Context for *Child*<sup>1</sup> safeguarding

ABM and AID recognize that *Child Abuse* is a widespread problem both in Australia and around the world, and that *Rights of the Child*<sup>2</sup> to protection are frequently denied.

ABM and AID further recognize that in various aspects of their operations, both in Australia and overseas, and through their partner organisations, *Children* may be *Vulnerable to Abuse and Exploitation* by our *Workplace Participants*. Risks of *Child Abuse and Exploitation* may occur as ABM and AID engage with churches of the Anglican Church of Australia for relationship-building and *Fundraising* purposes. Such *Risks* may also arise as ABM and AID deliver programs in partnership with organisations such as the National Aboriginal and Torres Strait Islander Anglican Council in Australia, and member churches of the worldwide Anglican Communion and their *Development and Humanitarian* arms.

ABM and AID recognize that the *Safeguarding and Protection of Children* is the responsibility of all ABM and AID *Workplace Participants*. Furthermore, ABM and AID and all their *Workplace Participants* have a legal and ethical responsibility to *Safeguard* the well-being of *Children* in their care.

Since ABM and AID, through their implementing partners, work with *Children* and adults in extremely *Vulnerable* positions, the nature of this work means that ABM, AID, and their partners are also at *Risk* of being targeted by people who seek access to such *Children* and adults through ABM's or AID's programs.

### Context for safeguarding against sexual exploitation, abuse and harassment

Because of ABM and AID's operating context, both in Australia and overseas, ABM and AID have a responsibility to work to *Safeguard* people *Vulnerable to Sexual Abuse and Exploitation* in their *Community Development* and other work with partners, and particularly when supporting *Partners* to respond to emergencies.

ABM and AID are committed to providing a safe working environment for all their *Workplace Participants*.

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<sup>1</sup> ABM and AID define a "Child" as any person under the age of 18 years.

<sup>2</sup> The *Rights of the Child* are defined in the *United Nations Convention on the Rights of the Child*.

Additionally, under Section 47C of the Sex Discrimination Act, ABM and AID have a *Positive Duty* to take reasonable and proportionate measures to eliminate in their workplaces, as far as possible, unlawful conduct including *Sexual Harassment and Sex-based Harassment*. (Examples of unlawful conduct can be found in our *Code of Conduct*, section 6 – SEAH).

In Australia, one in three workers experience *Sexual Harassment* in the workplace, but only half of these are reported.<sup>3</sup>

ABM and AID recognize that the Prevention of *Sexual Exploitation, Abuse and Harassment (PSEAH)* is the responsibility of all ABM and AID *Workplace Participants* and that ABM and AID's *Workplace Participants* may also experience SEAH.

ABM and AID recognise that SEAH is deeply rooted in *Gender Inequality*, discrimination and power imbalances and that part of preventing SEAH is to change cultures to promote *Gender Equality* and *Equity* within ABM and AID, and within our *Partner Organisations* and the Communities with whom they work. (See also ABM-AID's *Social Inclusion, Gender Equality and Diversity Policy*.)

ABM and AID further recognise that some groups of people are more *Vulnerable* to SEAH than others. This may be due to race, religion, ethnicity, indigeneity, disability, age, displacement, caste, gender, *Gender Identity*, sexuality, *Sexual Orientation*, poverty, class, or socio-economic status. Where a parent is a *Victim/Survivor* of SEAH, their *Children* can also be more *Vulnerable* to Abuse.

We particularly acknowledge that women and girls, *Children*, people with a *Disability*, *LGBTQI+* people and displaced persons are at a higher risk of SEAH. People's *Vulnerability* to SEAH can change with circumstances which can often be exacerbated, and likewise ameliorated, by *Development and Humanitarian Initiatives* over which AID and its *Partners* have some control.

Sex-based discrimination and conduct that creates a hostile workplace environment on the ground of sex and victimisation is covered in our *Social Inclusion, Gender Equality and Diversity Policy*.

### **Umbrella Safeguarding Policy**

Previously two separate policies, ABM and AID have now put *Child Protection and Safeguarding* and *Prevention of Sexual Abuse, Exploitation and Harassment* within this one umbrella policy. This creates efficiencies for complaints and investigation processes, a single *Safeguarding Focal Person*, recruitment and screening procedures, and risk assessment and management.<sup>4</sup> ABM and AID are aware, however, that there are *Risks* that combining the two policies may hide the unique *Risks* and responses required when dealing with *Children*<sup>5</sup>. It is hoped that these *Risks* are managed within the wording and layout of this policy, in the procedures and tools related to this policy, and in the maintaining of a separate *Child Protection Code of Conduct* alongside ABM-AID's organizational *Code of Conduct*.

**Definitions** (See "Definitions and Acronyms" at the beginning of this Compendium)

### **Purpose**

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<sup>3</sup> Australian Human Rights Commission, "Sexual Harassment in Australian Workplaces", 2021. Available at [https://humanrights.gov.au/sites/default/files/2020-10/sexual\\_harassment\\_in\\_australian\\_workplaces\\_-\\_australias\\_third\\_upr\\_2021.pdf](https://humanrights.gov.au/sites/default/files/2020-10/sexual_harassment_in_australian_workplaces_-_australias_third_upr_2021.pdf). Accessed 23/8/2023.

<sup>4</sup> Findings of *ACFID Child Safeguarding Learning Review*, Nov. 2021, p.23.

<sup>5</sup> *Ibid.*

The purpose of this policy is to express ABM's and AID's strong commitment to protect people, including *Children*, from *Exploitation and Abuse* of all kinds, and from *Sexual Harassment*, in both the ABM and AID workplace, and in the delivery of ABM's and AID's *Development and Humanitarian Initiatives* and other programs, and to show how ABM and AID will fulfill this commitment.

This policy is also intended to provide ABM and AID *Workplace Participants*<sup>6</sup> and other *Stakeholders* with clear behaviour and reporting protocols.

### Scope

This policy applies to all ABM and AID *Workplace Participants* and *Project Visitors*, and to ABM's and AID's *Partners* through formal agreements, and relates to the ABM and AID workplace, and to any work engaged in or funded by either ABM or AID, including all AID's *Development and Humanitarian Initiatives*.

### Policy commitments

#### A GENERAL

- 1 ABM and AID commit to effective leadership to enable the *Safeguarding of Children* and those who are *Vulnerable to SEAH*.
- 2 ABM and AID affirm the rights of all *Children* as per the *United Nations Convention on the Rights of the Child* and will *Safeguard* the personal dignity and *Rights of Children* towards whom we have a special responsibility, taking a zero-tolerance approach within in our own *Organisations* and operations (See *ABM-AID Code of Conduct*), and promoting a zero-tolerance approach with our *Partners*.
- 3 We also take a zero-tolerance approach to *Sexual Exploitation, Abuse and Harassment (SEAH)* and commit to advancing the *Safeguarding* of all who are *Vulnerable to SEAH* (See *ABM-AID Code of Conduct*).

#### B CODES OF CONDUCT

- 4 ABM and AID will maintain a *Child Protection Code of Conduct* (See Annex 1) that meets the minimum standards set by the *ACFID Code of Conduct* and *DFAT*, and the *General Synod of the Anglican Church of Australia*. Additionally, ABM's and AID's organisational *Code of Conduct* is intended as a guide for the maintenance of professional boundaries in relation to *Child Protection* and to *Prevention of Sexual Exploitation, Abuse and Harassment*.
- 5 ABM and AID will require all our *Workplace Participants* and *Project Visitors* to sign and subscribe to our *Child Protection Code of Conduct*. ABM and AID staff will sign this *Code of Conduct* as part of their employment contracts.

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<sup>6</sup> The term "Workplace Participants" is defined in the *Definitions and Acronyms* section at the end of this Compendium, and comprises *Staff, Volunteers, Responsible People* and *Third Parties*.

- 6 ABM and AID *Staff, Volunteers and Responsible Persons* will also be required to sign the ABM and AID organisational *Code of Conduct*.

## C SAFEGUARDING FOCAL PERSON

- 7 ABM and AID will appoint a *Safeguarding Focal Person*, responsible for *Child Protection* and the prevention of *Sexual Exploitation, Abuse and Harassment* whose work will be set out in a Terms of Reference reviewed regularly and approved by Senior Management. This *Safeguarding Focal Person* will be responsible for:
- i. receiving all reports of *Child Abuse and Exploitation* incidents and incidents of *SEAH*, as well as reports of breaches of this policy;
  - ii. providing regular reports on *Safeguarding* (including areas of high *Safeguarding Risk*) to the ABM and AID boards;
  - iii. conducting an annual review of ABM's and AID's *Safeguarding Risks*;
  - iv. conducting three yearly reviews of AID's and AID's *Partners' Safeguarding* policies and practices; and
  - v. ensuring regular training of ABM and AID *Workplace Participants* in this policy, in conjunction with other *Staff*.

## D RISK ASSESSMENT AND MANAGEMENT

- 8 AID will conduct regular *Safeguarding Risk Assessments* of our own and *Partner Safeguarding* systems and of all *Projects* that it funds. (See also #7ii and #7iii under "*Safeguarding Focal Person*", and #55 and #56 under "*Working with Partners*")

## E COMMUNICATION AND THE USE OF CHILDREN'S IMAGES AND STORIES

- 9 ABM and AID will implement strict guidelines for the collection and use of images and stories of *Children* and people in *Vulnerable* positions for publication in ABM and AID's written, audio-visual and online materials.
- 10 ABM and AID will at all times portray *Children* and people in *Vulnerable* positions in a respectful, dignified, adequately clothed, appropriate and consensual way. *Children* will not be portrayed in isolation, as submissive or in *Vulnerable* positions, or in poses that could be seen as sexually suggestive.
- 11 *Free, Prior and Informed Consent* must always be sought and documented for the use of a *Child's* story or images. This consent must be from both the *Child* and their parent or guardian. When seeking *Informed Consent*, details should be provided as to how, where and for how long the story, information or image will be used. It will be explained that ABM and AID cannot control the use of images once they are published or uploaded to the internet, and that they can be viewed by anyone at any time around the world.
- 12 To ensure the *Privacy and Safeguarding* of *Children* and adults in *Vulnerable* positions there must be no identifying information about a *Child* or an adult in a *Vulnerable*

position used in the publication of images by ABM and AID. This includes the person's name, or the name of their Community or school.

- 13 When sending images of *Children* or adults in *Vulnerable* positions electronically, file names and tags should not reveal any identifying information.
- 14 All images and information about *Children* and adults in *Vulnerable* positions will be stored safely and will only be accessed by authorized ABM and AID Staff.
- 15 Before deciding to publish an image or story of a *Child* or adults in a *Vulnerable* position, ABM and AID will analyse the risks to the *Child* or adult in a *Vulnerable* position of such a publication, including the risks of misuse of the image of the *Child* or adult in a *Vulnerable* position once it is uploaded to the internet. Neither ABM nor AID will publish stories or images of *Children* or adults in particularly *Vulnerable* positions.
- 16 Anyone taking images of *Children* on behalf of ABM or AID will be screened for their suitability and will be asked to obtain a *National Police Certificate* where appropriate. This includes all ABM and AID *Workplace Participants*, and all *Project Visitors*.
- 17 For more details of the use of images and stories of *Children* or adults in *Vulnerable* positions, see ABM-AID's Communications Manual and ABM-AID's Ethical Decision-Making Framework for Publications.
- 18 Images of *Children* held in ABM's substantial archive, largely in the State Library of New South Wales, are exempt from Policy Commitments 10 to 13, provided those images:
  - i. are marked "restricted status", which requires readers seeking access to and/or reproduction of such items to contact ABM to obtain permission for such access and/or reproduction;
  - ii. are, if accessed by ABM staff or volunteers, (apart from those staff and volunteers employed by the ABM Executive Director to work with the ABM archives, while carrying out their duties) only accessed for purposes which have been authorized in writing by the ABM Executive Director;
  - iii. are, with the exception of staff and volunteers employed to work with the ABM archives, only kept by said ABM staff or volunteers for the time taken to achieve (b) above. (See also ABM's "Archives Policy")

## F RECRUITMENT AND SELECTION

(See also ABM-AID's Recruitment Procedures and Workplace Guidelines)

- 19 ABM and AID are committed to preventing those who pose an unacceptable risk to *Children* from *Working with Children*, or from having contact with *Children* in any of ABM's or AID's work. Neither ABM nor AID will knowingly engage – directly or

indirectly – any person who poses a risk to *Children*.

- 20 ABM and AID will engage in safe recruitment, selection and screening processes for all their *Workplace Participants*. These processes will include:
- i. Promoting ABM's and AID's *Code of Conduct* and our commitments to *Child Protection* and *Safeguarding* and to preventing *SEAH* on the ABM/AID website and in all position descriptions, recruitment advertisements and tender documents;
  - ii. Ensuring all *Staff* who work with *Children* have appropriate qualifications and experience and have been cleared to work with *Children*;
  - iii. Requiring all *Staff*, *Volunteers*, *Responsible People*, and *Contractors* to show evidence of a clean *National Police Check/Criminal Record Check*<sup>7</sup> prior to engagement of and by requiring similar documentation (including Statutory Declarations in those countries where *Criminal Record Checks* are unavailable or unreliable) from *Partner Staff* working on *AID Development and Humanitarian initiatives* and *Partner Responsible People*.
  - iv. Conducting position risk-assessments to determine which positions will have *Contact with Children* and which will be *Working with Children*.
  - v. Requiring at least three *Verbal Referee Checks* prior to engagement of all *ABM and AID Staff* and *Volunteers*, one of which must be the candidate's most recent supervisor or employer. These checks will include direct questions about whether there have been any findings against the candidate in relation to *SEAH* or anything in their work history that would affect their suitability for *Working with Children*.
  - vi. Requiring at least two of the above references to be taken from previous employers and which include questions on the candidate's conduct and behaviour.
  - vii. Interview plans that include behaviour-based questions for all potential *ABM and AID Workplace Participants* who will have *Contact with Children*, including questions which probe motivations for *Working with Children*, the candidate's attitudes to *Children*, professional boundaries, and how they have responded in the past to concerns raised about *Children*.
  - viii. Interview plans that include scenario-based questions which probe attitudes and behaviours around *SEAH* for all positions.
  - ix. Checking any gaps in employment history. Neither ABM nor AID will employ people whom we have reason to believe have breached the *PSEAH* and/or *Child Protection* aspects of ABM-AID's *Code of Conduct*.
  - x. *Working with Children Checks*<sup>8</sup> for *Staff* and *Volunteers* who are likely to be *Working with Children*.
  - xi. Implementing any *Child Protection* requirements of the Anglican Church of Australia (noting that these may vary from diocese to diocese).

Further details of *ABM and AID's* recruitment and selection requirements can be found in B2021 Staff Recruitment Procedures and ABM's and AID's Workplace Guidelines.

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<sup>7</sup> The candidate must obtain a check in each country in which they have lived for at least 12 months over the previous five years, and for each country in which they hold citizenship. For Australian citizens these are called *National Police Checks* and may be applied for online at <https://www.afp.gov.au/our-services/national-police-checks>.

<sup>8</sup> *Working with Children Checks* may have other names in different states and territories of Australia.

- 21 ABM and AID *Workplace Participants* will require new *National Police Checks* every three years and those who work with or have *Contact with Children* will require new *Working with Children Checks* (or other state equivalents) every five years.
- 22 ABM's and AID's employment and consultancy contracts will include compliance with this *Safeguarding Policy*, our *Child Protection Code of Conduct* and the ABM-AID *Code of Conduct* as part of the contractual arrangements. ABM-AID's *Safeguarding Policy* forms part of the employee's contract and our *Child Protection Code of Conduct* must be signed before employment commences.
- 23 ABM and AID will include "Gender and *Safeguarding*" expertise as desirable skills when recruiting to our governing bodies.

## G INDUCTION, TRAINING, TRAVEL BRIEFINGS AND PERFORMANCE MANAGEMENT

- 24 ABM and AID are committed to providing training in *Safeguarding* to all their *Workplace Participants* and *Project Visitors*. Such training will include how to reduce *Risks* and create safe environments (including *Child-safe* environments).
- 25 All ABM and AID *Workplace Participants* and *Project Visitors* will be required to participate in training in and/or awareness-raising about this policy (including *Child Protection*) and in ABM-AID's *Code of Conduct* as part of their induction and in regular training provided by ABM-AID.

This training will include, but not be limited to, identifying, reporting, investigating, documenting and managing *Child Safeguarding* and *SEAH* incidents. Training will also include ABM's and AID's commitment to the *Rights of Children*, the *Rights of women and girls*, and the *Rights of LGBTI+ people*, and will include *Bystander* responsibilities.

Targeted training for those *Working with Children* and/or with images and stories of *Children* will also be provided.

- 26 ABM-AID's *Safeguarding Focal Person* will additionally be supported to attend externally provided *Safeguarding* training to stay informed of current practice.
- 27 AID is committed to supporting *Institutional Strengthening* and training in *Safeguarding* of all our *Partners*.
- 28 AID will support our *Partners* to consult about *Child Protection* and *Safeguarding* with *Children* and adults in the *Communities* in which they work, and from such consultations to provide information and accessible, *Child-friendly* processes for reporting *Child Exploitation* or *Abuse* or *SEAH* concerns about any ABM or AID *Workplace Participant* or the about AID's *Partner*.

- 29 Pre-travel briefings, conducted prior to ABM or AID *Workplace Participants* or *Project Visitors* making visits to our *Partners* and their *Communities* or churches, will include scenario-based discussions on *Child Safeguarding*, *SEAH*, power imbalances, status, and workplace cultures that can impact on work and personal relationships.
- 30 Post-travel briefings of ABM or AID *Workplace Participants* or *Project Visitors* will include attention to the psychological welfare of the returned traveller.
- 31 ABM and AID supervisors will include a discussion of *SEAH* and the ABM-AID *Code of Conduct* in *Staff* reviews, including reminders regarding *Whistleblower* obligations, and providing opportunities for *Staff* to raise concerns.

## H REPORTING AND COMPLAINTS-HANDLING

- 32 ABM and AID will make widely available, including on our website, a clear “*Child Protection Reporting Procedure*” for dealing with concerns and reports of *Child Exploitation* and/or *Abuse* and any allegations or suspicions of non-compliance with this policy or with ABM’s and AID’s *Child Protection Code of Conduct*. This will include the requirement to report to DFAT (or any other back-donor) immediately where the report involves DFAT (or other back-donor) funds. This Reporting Procedure will include ABM’s and AID’s available sanctions for breaches. This Reporting Procedure will also be fair and *Transparent*, whilst taking all reasonable steps to protect the *Confidentiality* of the complainant, the person being complained about and the alleged *Victim/Survivor*.
- 33 Our “*Child Protection Reporting Procedure*” will be *Trauma-informed*, fair, *Confidential* and *Transparent*. It will include what to report, when to report, to whom to report, how to report, what will happen next, and suggestions on how to support *Children* and adults who make reports. It will prioritise any immediate and ongoing needs of *Victims/Survivors* for protection and counselling/support.
- 34 For reporting suspected or alleged *SEAH* incidents, ABM and AID will provide and make widely available, including on our website, our “*Complaints and Critical Incident Handling Procedures*”. These procedures include a mechanism for identifying critical incidents, such as breaches of this policy and include details of investigation timeframes and an incident notification form.
- 35 ABM and AID will also publicise their “*Child Protection Reporting Steps*” and “*PSEAH Reporting Steps*” quick guides for use by ABM and AID *Staff* and *Volunteers*.
- Incidents of *SEAH* against persons under 18 are regarded as *Child Exploitation* or *Abuse*.
- 36 If a *Child Protection* or *SEAH*-related Complaint originates in a country outside Australia, ABM and AID will ensure it is adequately and appropriately investigated.



- 37 All alleged or proven incidents of *Child* Exploitation, *Child* Abuse, and SEAH will be documented and reported to the relevant ABM or AID board (via a standing 'Safeguarding' agenda item), taking into account the safety, wishes and welfare of Victims/Survivors.
- 38 All incidents of non-compliance with this policy or with a Partner's Safeguarding (including *Child* Protection) Policy will also be reported to the relevant Board.
- 39 ABM and AID will comply with all mandatory reporting requirements in relation to *Child Protection*.
- 40 Reports of *Child Abuse* and adult *Sexual Exploitation and Abuse* in Australia should be made to the police.

Complaints about sexual harassment can be made directly to the Australian Human Rights Commission at <https://humanrights.gov.au/complaints/make-complaint>.

Information about making complaints under the Sex Discrimination Act can be found at [https://humanrights.gov.au/sites/default/files/complaints\\_under\\_the\\_sda\\_-\\_september\\_2021\\_3\\_0\\_0.pdf](https://humanrights.gov.au/sites/default/files/complaints_under_the_sda_-_september_2021_3_0_0.pdf)

## I SANCTIONS, DISCIPLINE AND GRIEVANCE

- 41 ABM and AID take breaches of this policy very seriously, and any breaches may result in serious sanctions, including dismissal or termination.
- 42 Specifically, disciplinary action will be taken against any ABM or AID *Workplace Participant* found to:
- i. Have failed to report a *Child Protection* concern
  - ii. Have intentionally made a false allegation
  - iii. Have made a serious breach of this policy, including the *Child Protection Code of Conduct* at Annex 1
- 43 ABM and AID will require our partners to inform us immediately of any breaches of this policy or of the *Partner's Safeguarding* (including *Child Protection*) Policy and of any incidents of *Child Exploitation* or *Abuse* or *SEAH*. This requirement will be included in our annual Conditions of Funding Agreement with the *Partner*.
- 44 Sanctions may include the following:
- i. ABM or AID *Workplace Participants* – disciplinary action (which may include dismissal);
  - ii. All – where relevant, reporting to authorities;
  - iii. In accordance with relevant legislation, an allegation of *Child Exploitation*, *Child Abuse* or *SEAH* may lead to criminal prosecution.
  - iv. *Partners* – ABM and AID will work with *Partners* to try to determine the cause of the issue (eg, failure to report a policy breach or

incident to ABM or AID) and will support them to take steps to reduce the likelihood of such an issue occurring in the future. In the case of reported breaches or incidents, ABM and AID will support the *Partner* to review *Safeguarding Risks* and to apply *Learnings* appropriately.

Minor breaches of this policy may result in action such as refresher training or increased supervision.

- 45 Whilst any ABM or AID *Workplace Participant* is being investigated for allegedly perpetrating *Child Exploitation or Abuse* or an act of *SEAH*, that person will be suspended from their work or engagement with ABM or AID for the duration of the *Investigation*. Similarly, any ABM or AID *Project Visitor* will not be permitted to represent ABM or AID while an investigation is taking place into an allegation against them. As with all investigations of ABM *Workplace Participants* and *Project Visitors* the *Subject of the Complaint* will be treated with fairness, whilst ensuring the safety and needs of the *Victim/Survivor* are paramount. Since ABM-AID's *Safeguarding Policy* forms part of the employee work contract, staff will be made aware of this requirement prior to commencing work at ABM or AID.

## J VICTIM/SURVIVOR SUPPORT AND REPARATIONS

- 46 ABM and AID will provide appropriate support to *Victims/Survivors* of *Safeguarding* incidents (including *Child Protection* and *SEAH* incidents) relating to ABM or AID's work. This support will include access to legal, medical, social, and financial services. ABM and AID acknowledge that such support may need to continue after a *Victim/Survivor* has left the organization/s or after a *Program* or *Project* has ended. Support services include:
- 1800RESPECT (sexual violence counselling) (ph: 1800 737 732)
  - Lifeline (for crisis support) (ph. 13 11 14)
  - Headspace (for mental health resources) <http://www.headspace.com>
  - Beyond Blue (mental health counselling) (ph. 1300 22 4636)
- 47 Sources of advice about sexual exploitation, abuse or harassment in the workplace can be found on the Respect@Work website, <https://www.respectatwork.gov.au/> and from the Australian Human Rights Commission's National Information Service, 1300 656 419 (Option 2), 02 9284 9888, or Email: [infoservice@humanrights.gov.au](mailto:infoservice@humanrights.gov.au) .
- 48 ABM has joined the National Redress Scheme, along with other institutions and dioceses of the Anglican Church of Australia.

## K WORKING WITH PARTNERS, PROGRAMS AND CONTRACTORS

- 49 All ABM's and AID's contractual arrangements with *Partners*, and others contracted to work with ABM or AID, will include clauses on ABM/AID's expectations of *Partners* (or contractors) relating to *Safeguarding*, including the requirement to report all *Safeguarding* breaches or a breach of ABM/AID's or the partner's *Safeguarding* (including *Child Protection*) Policy to ABM/AID (via either our "*Child Protection Reporting Procedure*" or our "*Complaints and Critical Incidents Handling Procedure*").

Such agreements will also require our *Partners* to ensure that their own *Safeguarding* (including *Child Protection*) Policies and Procedures comply with this policy, and that *Partner Workplace Participants* and *Project Visitors* comply with these standards. (Website links to this policy will be included in such contractual arrangements.)

- 50 Where an AID *Partner* does not have its own *Safeguarding, PSEAH or Child Protection* Policy and procedures in place, AID will work with that *Partner* to support them to develop their own documentation and systems in line with global minimum standards, including the ACFID *Code of Conduct* (and DFAT *Child Protection Minimum Standards* for all AID *Partners* receiving DFAT funding through AID).
- 51 AID will include *Safeguarding Risk* management in all our project cycle management documents and systems, including in our *Partner Due Diligence* processes and our *Project Appraisal* process. AID's *Partner Institutional Capacity Assessments* will include assessment of the *Partner's Capacity* to implement *Safeguarding* and *Risk* policies.
- 52 AID will support our *Partners* to undertake *Safeguarding Risk Assessments* for all AID-funded *Programs* and *Projects*, as well as to undertake their own organizational *Safeguarding Risk* assessments and to develop *Risk Management Plans*. (See AID's *Partner Risk Assessment* tool.)

AID will monitor our *Partners' Risk Management Plans* regularly and expects our *Partners* to monitor them as well. Where projects are funded by DFAT, *Risk* assessments must follow guidelines in DFAT's *Child Protection* and *PSEAH* policies, and risk management measures must meet at least the 'Minimum Standards' for the level of risk assessed. AID will ensure that *Partner Safeguarding Risk Management* is monitored by relevant *Partner Staff* and *AID Program Staff*, and regularly reported to the AID Board).

AID *Programs* and *Projects* that involve direct work with *Children* and/or *Those in Vulnerable Positions* are considered a higher risk, and therefore will require more stringent *Safeguarding Risk* management.

- 53 AID will support our *Partner* to ensure their *Staff* and *Responsible People* receive induction and regular refresher training in *Safeguarding* (including *Child Protection*).
- 54 ABM and AID will encourage, support, and where relevant require, their *Partners* to implement:
- i. Recruitment and referral practices that prevent the hiring of perpetrators of *Child Abuse* or *SEAH*;
  - ii. Systems to efficiently deal with perpetrators (effective formal *Complaints*, feedback and response mechanisms) in order to increase protection of, and accountability to populations with whom they work;
  - iii. Regular training for all staff in prevention of and response to incidents of *Child Abuse* and *SEAH*; and,
  - iv. Safe, *Confidential* and accessible reporting processes which have a *Victim/Survivor-Centred Approach*, where all allegations of *Child Abuse* and/or *SEAH* are pursued rigorously, where concerns are heard and acted

upon and where *Victim/Survivors* and any witness/es are fully supported, and they and any *Complainant* are protected from retaliation.

- v. Anonymity for *Victims/Survivors* should they request it, or should their safety require it.

- 55 AID will regularly review our own and our *Partners' Child Protection* and *Safeguarding* policies, practices and capabilities, and, where needed, support *Partners* to strengthen their *Capabilities* in this area.
- 56 The implementation by AID's *Partner Organisations* of *Safeguarding* measures and any external compliance obligations are regularly monitored by AID through regular *Partner* visits, and regular project reporting.

## L PROGRAMS WHICH FACILITATE DIRECT CONTACT WITH CHILDREN

- 57 ABM and AID do not normally support projects which facilitate direct *Contact with Children*. ABM or AID *Workplace Participants* will often have some *Contact with Children* during regular staff monitoring visits to communities and pilgrimage and similar visits which ABM or AID periodically organizes for groups of *Supporters*, which are always accompanied by ABM/AID and *Partner Staff*. On any such visits, the ABM and AID *Workplace Participants* may NOT have direct contact with *Children* without their parent or guardian being present. See also ABM/AID's *Child Protection Code of Conduct* (Annex 1).

## M WORKING IN EMERGENCY CONTEXTS (AID)

- 58 Although AID does not directly implement *Humanitarian initiatives*, it does send funds to *Partners* to respond to a range of *Humanitarian* and domestic emergencies. To this end, AID is working towards compliance with the Core Humanitarian Standard<sup>9</sup> in its *Humanitarian initiatives*, including Quality Criterion 3, "Humanitarian response strengthens local *Capabilities* and avoids negative effects."
- 59 AID will encourage all *Partners* implementing AID-funded *Humanitarian initiatives* to ensure that a trained *Safeguarding Focal Person* in each emergency response location is available to support *Partner Staff* and *Volunteers* in conducting *Child Protection* and *Safeguarding* risk assessments, and to be responsible for taking and managing any complaints.
- 60 ABM-AID's "Communications Manual" requires that Communications about *Humanitarian initiatives* protect the increased *Vulnerability* of *Children* during emergencies.
- 61 AID does not currently deploy our *Workplace Participants* for *Humanitarian initiatives* and hence does not participate in the Misconduct Disclosure Scheme.

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<sup>9</sup> SPHERE Minimum Standards for Child Protection in Humanitarian Action. Available at <https://spherestandards.org/resources/minimum-standards-for-Child-protection-in-humanitarian-action-cpms/>  
Accessed 23/8/2023.

For further details about AID's Safeguarding commitments during *Humanitarian initiatives*, please see ABM-AID's "Humanitarian Response Policy" and "Humanitarian Response Procedures".

## N INCLUSION: INVOLVING CHILDREN AND YOUNG PEOPLE

- 62 Where possible, *Children* and young people will be consulted in the implementation of *Child-safe* practices. Through our *Partners*, *Children* in ABM's and AID's *Programs* will be given opportunities to express their views on matters affecting them, chiefly by involving them in all phases of the *Project Cycle* and as part of *Humanitarian initiatives*, including by encouraging *Children* to contribute to *Partner Safeguarding Risk Assessments* in communities, and by consulting with *Children* when formulating feedback and complaints processes, and informing *Children* in project sites of how to make a complaint.
- 63 Complaints mechanisms of ABM and AID and our *Partners* will aim to be *Child-friendly*.
- 64 As part of AID's monitoring and evaluation, where possible, *Children* will be asked their views about Safeguarding (including *Child Protection*) reporting mechanisms and whether/how they might be improved.

## Responsibilities for the Implementation of this Policy

### The ABM and AID Boards will

- Provide leadership to the *Organisations* in creating a clear *Safeguarding* culture at governance level, in the workplace, and in all the activities of ABM and AID. Maintain an organisational culture of adherence to the *Rights of the Child*.
- Champion and model a culture of zero tolerance to SEAH internally and with partners and other bodies;
- Promote Gender Equality.
- Undergo induction in this policy at commencement as a director
- Understand that this policy applies to the whole organisation, including ABM AID volunteers, helpers and contractors.
- ensure ABM and AID exercise their duty of care to ensure the safety of *Children* and adults in *Vulnerable* positions impacted by their work in Australia and overseas;
- Provide leadership in commitment of ABM and AID to Safeguarding, including *Child Protection*
- Exercise policy oversight over the *Child Protection Code of Conduct* and our organisational *Code of Conduct*
- Receive quarterly reports of Safeguarding (including *Child Protection*) Risks, incidents, training provided, etc
- Ensure ABM's and AID's approach to Safeguarding (including *Child Protection*) incident reports is survivor-centred and *Trauma-informed*;

### The ABM-AID Policy Committee will

- Review this policy regularly, and at least five-yearly, and more frequently if there are changes to legislation, ACFID CODE, DFAT requirements etc, ensuring compliance with General Synod, ACFID Code and DFAT requirements

### The ABM and AID Senior Management Team will

- Ensure they and *Staff* under their supervision take responsibility for *Child Protection and Safeguarding*;
- Appoint and review a Safeguarding Focal Person, according to an agreed and regularly reviewed Terms of Reference;
- Ensure all ABM and AID Staff and Volunteers are screened prior to appointment via interview questions, three *Verbal Referee Checks* and *National Police Checks*, and that *National Police Checks* are renewed every three years following appointment;
- Ensure those who will have contact with *Children* undergo *Working with Children Checks* prior to appointment and then every five years.
- Assess and ensure ongoing needs of victims where ABM or AID are deemed to have a responsibility;
- Ensure ABM's and AID's recruitment processes effectively screen out people with a history of SEAH;
- Work to prevent SEAH and deal effectively with incidents if they occur; Ensure Safeguarding Focal Person receives regular training in PSEAH;
- Effectively manage follow-up to complaints made by or against staff;
- Ensure all safeguarding risks are appropriately assessed, managed, and reported to the ABM and/or AID board/s at least quarterly.

#### **AID Programs staff/Reconciliation team will**

- Ensure risk assessment of partner organisations and projects take place and are monitored and updated;
- Ensure all Partners with whom ABM works have Safeguarding (including *Child Protection*) measures in place commensurate with their level of risk and that these are regularly monitored and reviewed;
- Ensure all relevant elements of this policy are followed by implementing Partners when AID sends funds for Development and Humanitarian initiatives, including any DFAT requirements where relevant;
- Encourage involvement of *Children* and young people in all consultation processes where ABM's or AID's work will affect them;
- Work to include *Children* and young people in development and review of complaints mechanisms.

#### **The Marketing & Fundraising Manager will**

- Ensure all stories and images of *Children* published by ABM and AID comply with this policy including stories and images supplied from outside ABM or AID.

#### **The Safeguarding Focal Person will**

- Draft reports of all *Child Protection* and SEAH concerns, suspicions, and incidents and ensure these are taken to the ABM and AID Boards; Assist in updating *Child Protection* and SEAH components of the "Corporate Risk Report" and the "AID Programs Risk Report" if applicable.
- Ensure training in this policy is provided to *Staff, Responsible Persons* and *Volunteers* on commencement at ABM or AID and regularly thereafter.

#### **The Complaints Officer will**

- Widely disseminate clear information about ABM-AID's "*Child Protection Reporting Procedures*" and "*Complaints and Critical Incident Handling Procedures*".
- Deal effectively with complaints when received.

- Engage with the Executive Director and/or Safeguarding Focal Person as appropriate in handling any reports of breaches of this policy.

**The Compliance Officer will**

- Act as a channel for feedback on this policy to the Policy Committee

**ABM and AID *Workplace Participants* who have contact or work with *Children* will**

- Ensure their *Working with Children* Checks are up to date.

**All ABM and AID *Workplace Participants* and *Project Visitors* will**

- Ensure they have read, understood and signed and put into effect ABM and AID's *Child Protection Code of Conduct* and ABM-AID's organisational *Code of Conduct*;
- Maintain and update their *National Police* checks;
- Ensure images and stories they provide to ABM or AID or obtain from outside ABM or AID comply with this policy.

**Related Laws, Standards, Policies and Procedures**

*United Nations Convention on the Rights of the Child* (United Nations, 1989)

Crimes Legislation Amendment (Sexual Offences Against Children) Act 2010

Australian Human Rights Commission Act 1986

Sex Discrimination Act 1984

Anti-Discrimination and Human Rights Legislation Amendment (Respect at Work) Act 2022

*Child Protection* legislation in each Australian state and territory

ACFID *Code of Conduct*: Specifically, commitments 1.3, 1.4, 1.5, 9.2, and 9.4.

DFAT Accreditation Guidelines, specifically A2.2, A2.3, A2.4, A3.1, A3.2, A3.3 and A3.4.

DFAT policies, including:

*Child Protection* Policy

*Child Incident Notification* Form

*Child Protection Risk Assessment* Guidance

PSEAH Policy

ABM and AID have a comprehensive set of Procedures, Guides and Forms relating to Safeguarding which are regularly reviewed, as well as relevant external agency policies and guidelines. These include:

*Child Protection Code of Conduct* (Annex 1)

ABM-AID *Code of Conduct*

AID Development Approaches Policy

ABM-AID Social Inclusion, Gender Equality and Diversity Policy

AID Working with Indigenous People in Partner Countries Policy

Workplace Guidelines

ABM-AID Travel Procedures

ABM-AID Whistleblower Policy

ABM-AID Complaints Handling Policy

ABM-AID Complaints and Critical Incidents Handling Procedures

*Partner Safeguarding Risk Assessment* Tool

AID Program Risk Matrix,

ABM and AID Corporate Risk Matrices

ABM and AID Risk Frameworks

ABM Board Risk Register  
AID Board Risk Register  
ABM-AID *Child* Protection Reporting Steps (Quick Guide)  
ABM-AID Prevention of Sexual Exploitation, Abuse and Harassment (Quick Guide)  
ABM-AID Complaints and Critical Incidents Register  
Complaints Record Form  
Critical Incident Reporting Form  
*Child* Protection Incident Reporting Form  
Terms of Reference for ABM/AID Safeguarding Focal Person

Other organisations, with whom ABM and/or AID have relationships, have the following policies relevant to Safeguarding:

- Anglican Church of Australia, Faithfulness in Service, Section 5: '*Children*' 2017
- CAN DO Safeguarding Standard Operating Procedure
- ACT Alliance *Child* Safeguarding Guidance Document
- ACT Alliance *Child* Safeguarding Policy



## ANNEX 1: ABM AND AID CHILD PROTECTION CODE OF CONDUCT



- 1.1 All ABM and AID Staff members, Volunteers, Responsible People and Third Parties (collectively called *Workplace Participants*) are responsible for maintaining a professional role with *Children*, which means establishing and maintaining clear professional boundaries that serve to protect everyone from misunderstandings or a violation of the professional relationship.
- 1.2 All ABM and AID Workplace Participants should conduct themselves in a manner consistent with their role and be a positive role model to *Children*. ABM and AID have developed this *Child Protection Code of Conduct* to protect *Children*, our *Workplace Participants* and the organisations by providing clear behavioural guidelines and expectations. Therefore –

### WHILST ENGAGED ON ABM OR AID BUSINESS I WILL:

- 1.2.1 Conduct myself in a manner that is consistent the values of ABM and AID.
- 1.2.2 Provide a welcoming, inclusive and safe environment for all *Children* and young people.
- 1.2.3 Respect all *Children* and treat them equally regardless of gender, race, religious or political beliefs, age, physical or mental health, sexual orientation, family and social background and culture, economic status, or criminal background.
- 1.2.4 Encourage open communication between all *Children*, young people, parents, staff and volunteers and have *Children* and young people participate in the decisions that affect them.
- 1.2.5 Immediately report any concerns of *Child Exploitation* or *Abuse* or breach of ABM-AID's *Safeguarding Policy* or this *Code of Conduct* according to the guidelines outlined in ABM-AID's *Safeguarding Policy*.
- 1.2.6 Immediately disclose all charges, convictions and other outcomes of an offence that relates to *Child* exploitation and abuse, including those under traditional law, which occurred before, or during my association with ABM and/or AID.
- 1.2.7 Take responsibility for ensuring that I am accountable and do not place myself in positions where there is a risk of allegations being made.

- 1.2.8 Self-assess my behaviours, actions, language and relationships with *Children* to ensure they are appropriate at all times.
- 1.2.9 Comply with all relevant Australian and overseas *Child* protection legislation, including labour laws in relation to *Child* labour.
- 1.2.10 Consult with ABM/AID's Safeguarding Focal Person or other relevant staff if I have any questions regarding *Child* protection and how it relates to my work/relationship with ABM or AID.
- 1.2.11 Comply with the ABM and AID *Child Protection* Policy and related Procedures.
- 1.2.12 Whenever possible, ensure that another adult is present when working near *Children*.
- 1.2.13 Be a positive role model for *Children*.

### 1.3 WHILST ENGAGED ON ABM OR AID BUSINESS I WILL NOT:

- 1.3.1 Engage in behaviour that is intended to shame, humiliate, belittle, degrade or exploit *Children*.
- 1.3.2 Use language or behaviour towards *Children* that is inappropriate, harassing, abusive, sexually provocative, discriminatory, demeaning or culturally inappropriate.
- 1.3.3 Do things of a personal nature that a *Child* (who is not part of my family) can do for him/herself, such as assistance with toileting or changing clothes.
- 1.3.4 Invite unaccompanied *Children* (who are not part of my family) into my home/hotel or other private location, unless they are at immediate risk of injury or in physical danger.
- 1.3.5 Sleep in the same room or bed as a *Child* (who is not part of my family) unless absolutely necessary, and then only with permission of my supervisor, and ensuring if possible that another adult is also present.
- 1.3.6 Smack, hit or physically assault or physically punish *Children*.
- 1.3.7 Involve *Children* in sexual relationships or any form of sexual activity, including paying for sexual services.
- 1.3.8 Develop relationships with *Children* that may be deemed exploitative or abusive.
- 1.3.9 Give or provide *Children* with alcohol or drugs.
- 1.3.10 Show favouritism through the provision of *Gifts* or inappropriate attention.
- 1.3.11 Behave provocatively or inappropriately with a *Child*.
- 1.3.12 Condone or participate in behaviour with *Children* that is illegal, unsafe, or abusive.
- 1.3.13 Act in a way that shows unfair or differential treatment of *Children*.

- 1.3.14 Hold, kiss, cuddle or touch a *Child* (who is not part of my family) in an inappropriate, unnecessary or culturally insensitive way.
- 1.3.15 Seek to make contact and spend time with any *Child* (who is not my own) or young person (who is not part of my family) outside the times when this forms part of my work.
- 1.3.16 Use any computers, mobile phones, video cameras, cameras, or social media inappropriately, nor use them for the purpose of exploiting or harassing *Children*, nor to access *Child* exploitation material through any medium.
- 1.3.17 Hire *Children* for domestic or other labour.

**1.4 WHEN PHOTOGRAPHING OR FILMING A CHILD, OR USING CHILDREN'S IMAGES FOR WORK-RELATED PURPOSES, I WILL:**

- 1.4.1 Obtain informed and documented consent of the *Child* and his/her parent or guardian **before** photography/filming.
- 1.4.2 Provide an explanation on how the photograph/film will be used.
- 1.4.3 Ensure photographs, films, videos and DVDs present *Children* in a dignified and respectful manner and not in a manner which makes them appear submissive or in a *Vulnerable* position. *Children* should be adequately clothed and not in poses that could be seen as sexually suggestive.
- 1.4.4 Ensure that images are honest representations of the context and facts.
- 1.4.5 Ensure file labels, meta data or text descriptions do not reveal identifying information about a *Child* when sending images electronically or publishing images in any form.
- 1.4.6 Take care to ensure the local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a *Child*.

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*I have read the above document and agree to observe the principles and ABM and AID Child Protection Code of Conduct described in this document.*

**Signed** \_\_\_\_\_ **Date** \_\_\_\_\_

**Name** \_\_\_\_\_

**Position** \_\_\_\_\_

**Company (if a contractor)** \_\_\_\_\_

Policy History	
Name of Policy	Date Adopted
Child Sex Tourism Policy	October 2004
Protection Policy	June 2010
Child Protection Policy & Guidelines	September 2010
Child Protection Policy & Guidelines	November 2013
Child Protection Policy (with separate Procedures)	March 2016
Child Protection Policy (with separate Procedures)	September 2018
Prevention of Sexual Exploitation, Abuse and Harassment Policy (new)	September 2019
Prevention of Sexual Exploitation, Abuse and Harassment Policy	September 2020
Child Protection Policy	September 2020
Prevention of Sexual Exploitation, Abuse and Harassment Policy	September 2022
Child Protection Policy	December 2022
Safeguarding Policy (amalgamation of <i>Child</i> Protection and PSEAH policies)	October 2023
Safeguarding Policy (amendments to comply with <i>Positive Duty</i> re sexual harassment; changes to address archival images of <i>Children</i> )	March 2024
Safeguarding Policy (regular review)	October 2024