Child Protection Policy

"The fight against poverty stands a good chance only when children are freed from exploitation, violence and abuse. Unfortunately, there is no quick-fix solution: A child cannot be immunised against abuse. But there is something that can be done. We can begin by ensuring that all children live in a strong protective environment" (UNICEF 2005: 26-27)

Projects of Promise policy on Child Protection is founded on a zero tolerance of child exploitation and abuse and seeks to align its child protection policies, and those of its partners with the Child Protection Policy introduced by the Department of Foreign Affairs and Trade (DFAT) in 2017, as updated in January and June 2018.

This policy has application to Projects of Promise Board, staff, representatives and development partners in relation to programs and projects funded by Projects of Promise.

The Projects of Promise Board requires that Projects of Promise engage with its staff and its development partners to ensure that this Child Protection Policy is understood, adopted and implemented. Discussion, training and formal agreements are to be in place to support embedding of the policy.

Where development partners have existing child protection policies in place, Projects of Promise will ensure that the policies meet the nine minimum standards required (outlined herein). Where development partners do not have an existing child protection policy, or the policy does not meet the nine minimum standards, Projects of Promise will work with the partner to assist them to meet the standards.

Policy Principles

In alignment with DFAT Child Protection Policy principles:

- Projects of Promise has a zero tolerance approach to child exploitation and abuse. Child exploitation and abuse will attract criminal, civil and disciplinary sanctions.
- Projects of Promise will not knowingly engage—directly or indirectly—anyone who poses a risk to children.
- Projects of Promise will work to minimise the risks of child exploitation and abuse associated with its functions and programs, and will train staff and partners on their obligations under this policy.
- Projects of Promise will assess its activities and seek to effectively manage, mitigate or reduce risks to children that may be connected to its programs.

- Projects of Promise will actively seek the commitment, support and cooperation of partner organisations and individuals who help to deliver programs funded by Projects of Promise.
- Projects of Promise will apply the principles of natural justice when making decisions that affect a person's rights or interests, in particular when responding to concerns or allegations of child exploitation and abuse.
- Projects of Promise recognises that the best interests of the child is a primary consideration and is committed to upholding the rights of children under the United Nations Convention on the Rights of the Child.

Risk-Context Based Approach

This policy provides a risk-context based approach to the management of child protection in relation to Projects of Promise operations in Australia and funded development activities overseas. Projects of Promise recognises that graduated risk exists as follows:

Who	Nature of engagement with children	Mitigation
Projects of Promise staff and representatives in Australia	● Little contact and no one-on-one contact with children.	● Police clearance (NPC) ● Reference checks
Projects of Promise staff and representatives making monitoring visits in project countries	● Limited contact with children and always in the presence of a development partner staff member or representative.	● Police clearance (NPC) –(*unless accompanied at all times by BF staff/representative)* ● Reference checks ● Briefing meetings prior to departure in which CP issues are addressed.
Projects of Promise representative on short-term assignment with development partner.	● Significant contact/working with children in working in program area. ● Perceived to be in a position of authority.	● Police checks ● Reference checks ● Child Protection policy training including reporting procedures
Development partner staff working with children.	● Significant contact/working with children. ● In position of formal authority in relation to children.	● Police clearance *(or local equivalent)* ● Reference checks ● Child Protection policy including reporting procedures

Assessment is required in relation to operations, programs and activities of Projects of Promise and its partners to understand both the context and the mitigation steps to be taken. Projects of Promise will use the DFAT Child Protection Risk Context matrix to assist in the making of risk assessments.

Responsibilities Under The Policy
Projects of Promise Board and staff must ensure child protection risk is considered, and is managed in accordance with this policy. Projects of Promise development partners are expected to act in accordance with the policy principles outlined in this document.
As all Projects of Promise development partners work with children, Projects of Promise will engage with partners to assess child protection risk and apply all nine minimum standards outlined in this policy.

Reporting Suspected Child Exploitation Or Abuse
It is mandatory for Projects of Promise staff and partners to report immediately any suspected or alleged case of child exploitation *(including possession of child exploitation material)*, abuse or policy non-compliance by any Projects of Promise staff or development partners covered by this policy. Where an individual or organisation has already reported, but becomes aware of additional information, the individual or organisation must also report that information.
Reports of breaches of this policy, whether in Australia or overseas, can be made by contacting in the first instance either:

Projects of Promise Executive Officer
M: E:

Projects of Promise Chairperson, Carlyle Ginger
M: 0421 611 993 E: carl.ginger@projectsofpromise.org

Allegations made in Australia:
If the incident has occurred in Australia, the Executive Officer may contact the police (depending on the nature of the incident) to investigate the allegation. Where the Executive Officer is the subject of the allegation, then the matter is to be reported to the Chairman of the Projects of Promise Board or another senior Board member.

Allegations made overseas:
Any allegation or incident which involves an Australian staff member, volunteer, donor or someone else representing Projects of Promise must be reported to the ICDO Country Representative, to the Executive Officer of Projects of Promise in Australia. In certain circumstances (see below) the matter must be reported to the Australian Federal Police. Any matter so advised must be confirmed in writing.
The ICDO Country Representative of the country in which the allegation is made is responsible for liaison with Projects of Promise and will follow its own legislative or internal procedures to investigate and address the allegations.

Duty to report to Australian Federal Police
To protect children overseas, the Australian Government has created offences under the *Commonwealth Criminal Code Act 1995*. It is a crime for Australian citizens, permanent residents or bodies corporate to engage in, facilitate or benefit from sexual activity with children (under 16 years of age) while overseas. These offences have provisions applying an extended geographical jurisdiction that enables offences committed overseas to be investigated and prosecuted in Australia. Other offences contained in the *Commonwealth Criminal Code Act 1995* include reference to offences associated with using a carriage service (eg mobile phone / internet) to commit offences related to the sexual exploitation of children. It is the responsibility of the Executive Officer, or in their absence, the Chair of Projects of Promise Board, to ensure that any offences of the kind identified in this section suspected of having been

committed overseas by an Australian citizen, permanent resident or body corporate is reported immediately to the Australian Federal Police.

Report the Incident
Any incident, belief or suspicion of any form of physical or mental violence, injury or abuse, maltreatment or exploitation, including sexual abuse (past or present) by an employee, agent, partner, sponsor, donor, Board-member or other related person must be reported immediately to the Executive Officer, or in their absence, to the Chair of the Projects of Promise Board. If a child reports an incident to a Projects of Promise representative or partner, the child/young person must be taken seriously and listened to carefully. At no time should the child be returned to the environment where the abuse occurred.

Document the incident
As soon as possible *(within a period of 24 hours of the disclosure),* the staff member receiving the disclosure needs to have fully documented the allegation, including the time, place, witnesses. The Complaints Referral form must be completed. (*Attachment* C)

Confidentiality
All cases of child abuse, whether alleged or proven, will be handled with the utmost confidentiality. When concerns arise, all participants will be directed through a formal complaints process involving the Projects of Promise Executive Officer.

Reporting allegations of physical/sexual abuse to police
All allegations of physical or sexual assault in Australia must be reported to the police, whether or not the victim has consented to the matter being reported. The reporting of allegations in countries other than Australia needs to considered carefully having regard to the likelihood that the report will seriously handled and the victims needs and rights will be protected. The family of the child should be informed of the allegation and action proposed. They should be consulted where possible on the process to be followed.

Distance The Alleged Perpetrator
The best interests of the child/young person may warrant the standing down of a staff member or volunteer while an investigation commences. Staff members stood down receive full pay and are entitled to a just process that does not pre-suppose guilt or innocence. The allegations should not be discussed or communicated to other people until such have been considered and a decision made by management. The decision made should be documented and filed.

Policy Review
November 2025, on change of legislation, or at the discretion of the Board of Projects of Promise.

Policy Version
1.0

Child Protection Policy: ATTACHMENT A

Child Protection Policy & Reporting – Minimum Standards

Minimum Standard 1:	*Compliance to be demonstrated by:*
Partners Projects of Promise has a child protection policy that applies to all personnel, partner's downstream personnel and subcontractors that are engaged by the organisation to perform any part of a DFAT funded activity. The managing partner must ensure the downstream organisation or individual subcontractor complies with the relevant minimum child protection standards. **Individuals** An individual contractor is not required to have a child protection policy. However, they will be required to sign a code of conduct that applies and builds on where appropriate DFAT's Child Protection Professional Behaviours and provide evidence of their commitment to child protection.	**Partners** ● Child protection policy in place ● Personnel aware of the organisation's child protection policy (e.g. through internal communication and training) ● Documented plan for ensuring downstream DFAT funded partners are meeting the minimum standards ● Initial risk assessment of organisation and activities to inform policy development **Individuals** ● Attend child protection training ● Sign code of conduct ● Commitment to child protection ● Current Criminal Record Check

Minimum Standard 2:	*Compliance to be demonstrated by:*
Projects of Promise child protection policy includes a documented reporting procedure for child exploitation and abuse allegations, code of conduct and policy non-compliance, including available sanctions for breaches.	● Organisation's guidelines for managing concerns or allegations of child exploitation and abuse, and policy non-compliance ● Documentary evidence that personnel can raise concerns about a child's safety or well-being or unacceptable behaviour by personnel ● Documentary evidence outlining the organisation's details of available sanctions ● Documentary evidence that policy and reporting information is publicly available and accessible to community members

Minimum Standard 3:	*Compliance to be demonstrated by:*
Projects of Promise provides child protection training for personnel, including downstream partners.	● Training attendance records ● Training agendas and timeframes for training ● Materials used in training

Minimum Standard 4:	*Compliance to be established by:*
Vine Communities child protection policy includes a commitment to preventing a person from working with children if they pose an unacceptable risk to children.	● Referenced in relevant documentation, including policies, contracts and human resource guidelines

Minimum Standard 5:	*Compliance to be demonstrated by:*
The organisation's child protection policy is subject to regular review, at least every five years or earlier if needed.	● Policy is subject to regular review in accordance to the policy commitment, or at least every five years

Undertaking Assessment and Management of Risk – Minimum Standards

Minimum Standard 6:	*Compliance to be demonstrated by:*
Projects of Promise undertakes a risk assessment to reduce the risk of any child being harmed as a result of-operations or activities funded by DFAT. The assessment must identify risks, and document steps being taken to reduce or remove these risks.	● Risk plan identifying activities and measures to reduce or remove the risk to children ● Documentation that risk assessments are reviewed and updated regularly during the life of the activity ● Evidence of adaption to local context (when a different approach to standard risk controls is required)

Recruitment, Screening & Employment Practices – Minimum Standards

Minimum Standard 7:	*Compliance to be demonstrated by:*
Vine Communities employment contracts contain provisions for suspension or transfer to other duties of any employee who is under investigation and provisions to dismiss any employee after an investigation.	● Employment contracts for personnel/consultants contain appropriate provisions related to suspension or transfer to other duties of an employee who is under investigation and dismissal after any adverse finding after investigation.

Minimum Standard 8:	*Compliance to be demonstrated by:*
Contact with children positions Projects of Promise has robust recruitment screening processes for all personnel in contact with children. These recruitment procedures include: ● criminal record checks before engagement ● verbal referee checks **Working with children positions** Additional screening measures (such as interview plans that incorporate behavioural-based interview questions) must be used when candidates are applying for positions that involve working with children.	● Documented criminal record checks for personnel in contact with children ● Documented verbal referee checks ● Documented request for an applicant to disclose whether they have been charged with child exploitation offences, and their response ● Interview plans incorporating behavioural-based interview questions that are specific to positions that involve working with children ● Review checks when personnel have a change in circumstances ● In limited circumstances it may prove impossible to obtain a reliable criminal record check. A statutory declaration, or local legal equivalent, outlining efforts made to obtain a foreign police check, and disclosing any charges and spent convictions related to child exploitation, may be accepted instead ● Checks must be conducted for each country in which the individual has lived for 12 months or longer over the last 5 years, and for the individual's countries of citizenship

Minimum Standard 9:	*Compliance to be demonstrated by:*
Projects of Promise has a child protection code of conduct that meets and – builds on (where appropriate) – the minimum standard set by DFAT *(see Attachment B – DFAT's Child Protection –Professional Behaviours).*	● A risk based child protection code of conduct based on DFAT's Child Protection – Professional Behaviours ● Signed codes of conduct or a register documenting details of personnel who have signed the code of conduct, or inclusion in employment contracts ● Signed image consent forms/ verbal consent file notes

Board, Staff and Partner Compliance

It is a responsibility of the Executive Officer to monitor and evaluate compliance of Projects of Promise staff and partners with this policy. Questions regarding the policy, training in relation to it, and compliance are to be addressed in Annual Partner Governance Reports and in monitoring visit reports.

Use of Images and Personal Information

In relation to the use of images and personal information for promotion, fundraising and development education purposes, Projects of Promise will ensure the privacy and safeguarding of children is both preserved and maintained. Images and information will only be used with consent.

Child Protection Policy: ATTACHMENT B

Child Protection – Professional Behaviours

Projects of Promise's position on Professional Behaviours (Code of Conduct) mirrors that of DFAT in requiring that those working or having contact with children either directly on behalf of Projects of Promise or funded by Projects of Promise are expected to adhere to the following behaviours while they are performing those duties:

- Treat all children with respect
- Not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate
- Not engage children under the age of 18[1] in any form of sexual intercourse[2] or sexual activity,[3] including paying for sexual services
- Wherever possible, ensure that another adult is present when working near children
- Not supply children with alcohol or drugs
- Not supply children with gifts
- Not invite unaccompanied children into private residences, unless they are at immediate risk of injury or in physical danger
- Not sleep close to unsupervised children unless absolutely necessary, in which case the supervisor's permission must be obtained, and ensuring that another adult is present if possible (noting that this does not apply to an individual's own children)
- Never use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material through any medium
- Not use physical punishment on children
- Not hire 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 exploitation and abuse and policy non-compliance in accordance with appropriate procedures
- 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 occurs during association with DFAT
- Be aware of behaviour and avoid actions or behaviours that could be perceived by others as child exploitation and abuse

These behaviours are not intended to interfere with normal family interactions.

When photographing or filming a child or using children's images for work-related purposes:

- Take care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child

- Obtain informed consent from the child and parent or guardian of the child before photographing or filming a child. An explanation of how the photograph or film will be used must be provided

- 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

- 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

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[1] Where the child is 16 years or older and the other party is not more than 2 years older; and it can be established that the child consented to the relationship, an exception can be recorded promptly on personnel files.
[2] As defined under the *Criminal Code Act 1995.*
[3] As defined under the *Criminal Code Act 1995.*

Child Protection Policy: ATTACHMENT C

COMPLAINTS REFERRAL FORM

Please submit complaints form to:

Projects of Promise Chairperson, Carlyle Ginger
M: (+61) 421 611 993
E: carl.ginger@projectsofpromise.org

Complaints will be treated confidentially

COMPLAINANT DETAILS

Name of Complainant	
Ethnic origin/Nationality	
Address/Contact	
Identity no.	
Gender	

VICTIM DETAILS

Name of Victim		
Ethnic origin/Nationality		
Address/Contact details		
Identity no		
Age		
Gender		
Name(s) and address of Parents/Guardians, if under 18		
Has the Victim given consent to the completion of this form?	YES	NO

INCIDENT DETAILS

Date of Incident(s)	
Time of Incident(s)	
Location of Incident(s)	
Physical & Emotional State of Victim (Describe any cuts, bruises, lacerations, behaviour, and mood)	
Witnesses' names and Contact Information	
Brief Description of Incident(s) (Attach extra pages if necessary- see end of form)	

ACCUSED PERSON'S DETAILS

Name of accused person(s)	
Job Title of accused person(s)	
Organisation accused person(s) works for	
Address of accused person(s) (if known)	
Age	
Gender	
Physical description of accused person(s)	

RESPONSE DETAILS

Have the police been contacted by the victim?	YES	NO
If yes, what happened?		
If no, does the victim want police assistance, and if not, why?		
Has the victim been informed about available medical treatment?	YES	NO
If yes, has the victim sought Medical Treatment for the incident?	YES	NO
If yes, who provided treatment? What is the diagnosis and prognosis?		
What immediate security measures have been undertaken for victim?		
Who is responsible for ensuring the safety plan (Name, Title, Organisation)		
Any other pertinent information provided in interview (including contact made with other Organisations, if any)		
Details of referrals and advice on health, psychosocial, legal needs of victim made by person completing report		

REPORT DETAILS

Report completed by (name)			
Position/Organisation			
Date/Time/Location			
Has the Complainant been informed about the Organisation's procedures for dealing with complaints?		YES	NO
Signature/thumb print of Complainant signalling consent for this form to be shared with the relevant management structure*			
Complainant's consent for data to be shared with other entities (check any that apply)			
Police Project leader (name)			
Community Services agency (name)			
Health Centre (name)			
Other (Specify)			

Date Report forwarded relevant management structure*	
Received by relevant management structure*	
Name	
Signature	
Position	
Date	

**Relevant management structure is the official(s) responsible for sexual exploitation and abuse issues in the Headquarters of the Organisation where the accused person works or is based*

All information must be held securely and handled strictly in line with applicable reporting and investigation procedures

DESCRIPTION OF INCIDENT