



## **CHILD SAFEGUARDING POLICY (CSP)**

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*When relevant, this policy and associated documents should be translated into the local language to ensure access to all personnel.*

## CONTENTS

1. INTRODUCTION	2
2. PURPOSE	3
3. SCOPE	3
4. STANDARDS AND PRINCIPLES	3
5. GUIDELINES	5
5.1 Organisation-wide risk management	5
5.2. Human Resources	5
5.3 Involvement and support of children and young people	6
5.4 Involvement of families and communities	7
5.5 Awareness raising and risk management of delivery partners and projects	7
5.6 Humanitarian Emergencies	8
5.7 Communication risk management	8
5.8 Education and fundraising activities - risk management	9
5.9 Breach of this Policy or of AHF Codes of Conduct	9
5.10 Incident reporting and handling	9
5.11 Sanctions	9
6. ROLES AND RESPONSIBILITIES	10
6.1 Board and CEO	10
6.2 Managers	10
6.3 Employee	10
6.4 Child Safeguarding Officer and Incident Reporting Focal Person	11
7. REVIEW OF POLICY	11
8. LEGISLATIVE, REGULATORY AND POLICY FRAMEWORKS	11
<b>ANNEX A DEFINITIONS OF KEY TERMINOLOGY</b>	<b>12</b>
<b>ANNEX B AHF CHILD SAFEGUARDING CODE OF CONDUCT</b>	<b>14</b>
<b>ANNEX C INCIDENT REPORTING PROCEDURES</b>	<b>16</b>
ANNEX D SERIOUS INCIDENT REPORT FORM	20
ANNEX E CHILD SAFEGUARDING CONTACT PEOPLE	26

## 1. INTRODUCTION

The Australian Himalayan Foundation (AHF) works with local partners to improve the quality of life of the people most in need in remote areas of Nepal, Bhutan and the Indian Himalayas.

AHF has a zero-tolerance approach to child abuse or exploitation in any form and is fully committed to respect, protect and fulfil the rights of children as outlined in the UN Convention on the Rights of the Child (CRC 1989)<sup>1</sup>. A child is defined as any person under 18 years, *see Definitions in Annex A*. AHF recognises that some children, such as Indigenous and ethnic minority children, children with disabilities, children living in poverty and children living in areas impacted by disasters (natural or conflict-based), are particularly vulnerable to abuse and exploitation.

Children in the Himalaya face a number of challenges including:

- Shortage of medical services,
- Ill health including high rates of diarrhoea and respiratory tract infections
- Entrenched poverty causing malnourishment, migration, hardships and lack of parental care
- Risk of child labour and child trafficking
- Domestic/family violence
- Natural disasters
- Marginalisation of ethnic and caste groups
- High incidence of physical punishment of children.

AHF is committed to promoting the rights of children in its work and ensuring children are safeguarded from harm. AHF will not tolerate any form of child abuse. This Policy, in association with the Annexes and associated Child Safeguarding (CS) operational forms/documents, will be used to guide, inform and educate AHF employees, volunteers and partner organisations in order to meet those commitments.

AHF adheres to local and international child protection laws in relation to all forms of child abuse and child exploitation including child sex tourism, child sex trafficking, child labour and child pornography.

This policy is to be read in conjunction with:

- AHF Risk Management Policy
- AHF Complaints and Whistleblowing Policy
- AHF Prevention of Sexual Exploitation and Abuse Policy
- AHF Communications Policy
- AHF Employee Handbook
- AHF Procedures Manual
- AHF Volunteers Policy
- AHF International Program Manual

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<sup>1</sup> Children's Rights are clearly articulated in the Convention on the Rights of the Child. All employees and partner organisations are encouraged to familiarise themselves with these Rights:

<http://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>

## 2. PURPOSE

The purpose of this Policy is to protect children and young people from exploitation and abuse of all kinds in the delivery and management of AHF programs and activities and to ensure that children's rights are respected, protected and fulfilled.

The policy also affirms AHF's commitment to preventing a person from working with children if they pose risks to children. AHF does not tolerate child abuse of any form by anyone who works for or is associated with the Organisation in any capacity.

AHF is actively working towards achieving a Child Safe Organisation culture where the concerns for the safety of a child are paramount and the organisation prioritises child safety. This Child Safeguarding Policy (CSP) provides guidance on how to interact respectfully and effectively with children and how to respond to concerns about child abuse in its many forms.

## 3. SCOPE

This Policy applies to all AHF personnel including Board and Committee members, employees, volunteers, consultants and other AHF representatives, as well as in-country partners and affiliates. It also applies to individuals or groups engaged on a short-term basis, such as sub-contractors, by AHF and its partners. This includes but is not limited to photographers, professionals providing training or other support, visiting donors and supporters, including AHF led tours, trekking groups and media personnel. These personnel are required to accept and sign the CSP *Code of Conduct* as part of their involvement with AHF (see below).

As AHF does not directly implement programs, working instead through local implementing partners, the Foundation will work closely with these partners to operationalise the principles outlined in this Policy.

AHF is committed to ensuring that child safeguarding is the responsibility of everyone within or associated with AHF and all partners who work with the Foundation.

## 4. STANDARDS AND PRINCIPLES

### STANDARDS

#### Knowledge

- AHF will ensure that all Board and Committee members, employees, volunteers, consultants and in-country partners/affiliates and other relevant stakeholders are made aware of the nature of child abuse and the risks to children; share our commitment to a zero-tolerance approach to child abuse in its many forms; and understand the AHF CSP policy and adhere to it at all times.

### **Risk management**

- AHF will take proactive steps to create child-safe and child-friendly programs by assessing and managing the risks to children and taking all reasonable steps to ensure that children are safe from harm and abuse.

### **Reporting**

- AHF will ensure that all AHF personnel, partner organisations, and individuals/groups engaged on a short-term basis are aware of their responsibility to report concerns regarding the safety of children and that they understand how to make a report.

### **Responding**

- AHF will treat all reports of suspected or actual abuse seriously and ensure action is taken that prioritises the protection and safety of children in accordance with the organisation's procedures.

## **PRINCIPLES**

In order to meet the standards set out above, AHF will work closely with stakeholders and partner organisations to build their child safeguarding capacity by upholding the following Principles:

**Principle 1:** Child safety and wellbeing is embedded in organisational leadership, governance and culture.

**Principle 2:** Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.

**Principle 3:** Families and communities are informed and involved in promoting child safety and wellbeing.

**Principle 4:** Equity is upheld and diverse needs respected in policy and practice.

**Principle 5:** People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.

**Principle 6:** Processes for complaints and concerns are child focused.

**Principle 7:** Personnel are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.

**Principle 8:** Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.

**Principle 9:** Implementation of child safe principles is regularly reviewed and improved.

**Principle 10:** Policies and procedures document how the organisation is safe for children and young people.

## 5. GUIDELINES

### 5.1 Organisation-wide risk management

AHF has an organisation-wide risk management framework. Child safeguarding risks are included in this framework. All risks are tracked on a risk register and risks rated as medium and above have risk mitigation plans and are regularly monitored. High and very high organisational risk activities, and very high program risks will be reported to each Board meeting.

AHF will assess its organisational child safeguarding practices every two years. If any trends are emerging or any alleged or actual incident occurs (managed as per this policy and the AHF Procedures Manual), AHF will conduct an urgent re-assessment. AHF will conduct an assessment of all partners' child safeguarding practices every two years.

### 5.2. Human Resources

#### 5.2.1 Safe Recruitment Practices

AHF will ensure high standards are adhered to during recruitment, selection and screening of all personnel. This includes employees, volunteers, consultants and others who may be engaged with AHF. Recruitment of employees will strictly follow AHF's Recruitment Policy and Procedures in the Employee Handbook and Procedures Manual, including:

- Acknowledging in job advertisements and role descriptions our commitment to safeguarding;
- Interview questions and referee check questions about safeguarding (including behavioural questions);
- Criminal record checks (including checks for other countries of citizenship and any country resided in for more than one year in the prior five years) (*renewed every 5 years*);
- Working with Children checks (*renewed every 5 years*).

All personnel and representatives must sign AHF Code of Conduct and AHF Child Safeguarding Code of Conduct (*re-signed every two years*).

Non-employee personnel roles (e.g. volunteers and consultants) are assessed for direct or indirect contact with children (including access to personal information of children) and will be required to meet robust child-safe recruitment and screening procedures. Required checks will be reviewed when personnel have a change in roles, responsibilities or circumstances.

We will not knowingly engage any personnel to be in direct or indirect contact with children or access communities whom we work with if they pose an unacceptable risk to children's safety or wellbeing.

AHF employment contracts include relevant clauses about safeguarding expectations of personnel, including provisions for dismissal.

#### 5.2.2 Induction and training

We commit to building knowledge, understanding and awareness of child safeguarding and abuse as well as how to reduce risk and create safe environments for children. Training will include safeguarding policy obligations including reporting requirements and processes:

- Employees and non-employee personnel who have been assessed as having contact with children will be required to participate in safeguarding training as part of their induction, regular ongoing refresher training and targeted training depending on their role or contact with children.
- Visitors to our programs or activities will be screened according to AHF requirements based on assessed contact risks, and provided with a relevant safeguarding induction, including reporting obligations, prior to any visit taking place.
- Program partners will be provided with Safeguarding training and capacity strengthening. We will work with partners to cascade safeguarding requirements to their downstream partners.

The induction process is detailed in the AHF Employee Handbook and Procedures Manual.

Training will make sure that employees and volunteers are attuned to signs of harm, particularly organisational child sexual abuse, and on how to ensure child friendly ways for children to communicate and raise their concerns. Relevant employees and volunteers will be supported to develop practical skills in protecting children and responding to disclosures.

### **5.2.3 Support to employees**

Disclosure of child abuse is a difficult and emotional experience for both child victims and for employees who report or are involved in dealing with the issue. In orienting employees on this policy, AHF will seek to equip employees to receive reports of abuse or respond to disclosure in ways which affirm and support child victims and ensure the best interest of the child is the first consideration. Support for employees involved in the process will be provided through a relevant supervisor and/or AHF Child Safeguarding Advisor and additional external support can be provided through AHF's Employee Assistance Program -Access EAP 1800 818 728.

## **5.3 Involvement and support of children and young people**

AHF is committed to child and youth participation in its programs overseas and community engagement in Australia. AHF recognises that children and young people are kept safer when they understand their rights and when mechanisms and processes are available that ensure that their voices, views and opinions are encouraged.

AHF will strive to ensure that opportunities are provided for children to understand their rights to safety and protection, have their views heard and have them inform future amendments to the Foundation's programs. Children should be asked for feedback on AHF personnel and services, invited to make comments and be informed on how to make a complaint. A child-friendly reporting process will be developed. Where possible, sexual abuse prevention programs and information will be provided to children.

AHF will actively anticipate children's diverse circumstances and make every effort to respond effectively to those with additional vulnerabilities. Particular attention will be paid to the needs of children with disabilities, and children from culturally marginalised backgrounds.

Consultation will always be undertaken with the documented permission and in collaboration with children's parents and wider family, wherever possible.

In case of incidents, support will be offered to children and young people who have suffered or been exposed to abuse, regardless of whether a formal internal response is carried out (such as an internal investigation). Support can include specialist psycho-social counselling and/or access to other specialists and appropriate support as needed. The children and young people concerned will be able to choose if and when they would like to take up the support options available to them.

#### **5.4 Involvement of families and communities**

AHF will also ensure that families and communities are informed and involved in AHF programs design, implementation, monitoring and evaluation. Families should be informed of the rights of their children as required under the UN Convention on the rights of the child. AHF recognises that families have the primary responsibility for the upbringing and development of their child and that they should participate in decisions affecting their child.

AHF is committed to engaging in open, two-way communication with families and communities about its child safety approach and to ensure that relevant information is accessible.

#### **5.5 Awareness raising and risk management of delivery partners and projects**

AHF recognises that there are a number of potential risks to children in the delivery of its programs. AHF assesses and manages these risks by examining personnel, projects and in-country delivery partners and their potential impact on children. Procedures for assessing and mitigating project and partner risks are included in the AHF International Program Manual. Projects that involve direct contact with and working with children will be considered a higher risk and therefore require more stringent child protection procedures and risk management planning.

AHF is committed to ensuring that child safeguarding mechanisms are embedded in all program and partnership development as follows:

- AHF's Child Safeguarding and wider safeguarding policies will be promoted and risk management undertaken throughout its work with project partners when:
  - conducting due diligence assessment prior to partnering with an organisation and regularly during the partnership, which will include partner child protection risk assessment;
  - developing project design including project child protection and prevention of sexual abuse, exploitation and harassment, and overall risk management frameworks;
  - developing complaint handling processes, including working with partners to ensure every project has a child-friendly reporting process;
  - appraising the project;
  - signing project agreements;
  - monitoring of project, partner and risks;
  - developing partner capacity strengthening plan;
  - evaluating projects.
- AHF will educate partner employees and stakeholders about how to reduce risks and ensure that children are safeguarded in all organisational activities.



- AHF will strive to ensure that implementing partners have an informed understanding of child safeguarding processes and understand how to report, investigate, document and manage child abuse and exploitation incidents.
- Feedback from children and communities on AHF and partner role and employee's behaviours, as well as complaints, will be actively sought.
- AHF will strive to develop transparent and accessible complaints mechanisms and reporting processes together with partners and project participants. Designated, and ideally senior, AHF representatives should present feedback to communities on what changes have been made resulting from complaints.
- Employees working directly with project participants must receive training on how to receive complaints and disclosures.
- High risks and above to children identified in projects will be reported to the CEO and very high risks to PAC and the Board as per AHF Risk Management Policy.

## **5.6 Humanitarian Emergencies**

AHF is committed to reducing children's vulnerability to emergencies, ensuring their right to have humanitarian assistance in crises, and their right to survival and development during and after an emergency. Children are likely to make up half or more of the population affected by conflict and disasters. AHF will put in place processes to safeguard children during emergencies and crises.

## **5.7 Communication risk management**

AHF employees and partners will portray children in a respectful, appropriate and consensual way at all times. Personnel should always be guided and bound by the AHF's Communication Policy and the associated procedures when taking photographs. This includes ensuring that informed consent has been sought from both child and parents/guardians for child participants in AHF-funded projects.

AHF has a system in place to ensure that any public materials comply with the above Policy and procedures.

Children and young people are vulnerable to abuse and exploitation when using online sites and channels, including social media sites. Risks to children online include: online grooming, sexual abuse or sexualised language or posting of inappropriate content, bullying and discrimination (threats, shaming, humiliating, teasing, discrimination). AHF personnel, including volunteers, are not to connect with or form relationships with any person under 18 who they meet through AHF-related work.

AHF will strive to ensure that risks in the online and physical environment are identified and mitigated without compromising a child's right to privacy and healthy child development. The online environment should be used in accordance with the AHF's Code of Conduct, Communications Policy and Social Media Policy.

## 5.8 Education and fundraising activities - risk management

AHF conducts education and fundraising activities. Employees and representatives working on those activities on behalf of the organisation will be required to comply with all AHF policies, guidelines and processes in order to safeguard children, including ensuring necessary screening checks are undertaken.

Compliance assessments for all engagement, education and fundraising activities will be conducted, by AHF officers at regular intervals.

## 5.9 Breach of this Policy or of AHF Codes of Conduct

AHF personnel must immediately report:

- Any breach of the Codes of Conduct or behaviour that they suspect may be child exploitation and abuse, including possession of child exploitation material, or policy non-compliance by;
  - AHF personnel, including Board and Committee members, employees, volunteers, consultants, and other AHF representatives including donors, members and sub-contractors;
  - personnel of an AHF partner organisation.
- Any report made by anyone relating to child exploitation and abuse or policy non-compliance by AHF personnel or personnel of an AHF partner organisation.

It is the responsibility of personnel to report the incident, not investigate it.

For projects benefitting from DFAT funding, AHF is required to immediately report child exploitation and abuse suspicions or allegations to DFAT.

## 5.10 Incident reporting and handling

Any suspected or actual incident, concern or allegation involving child abuse or exploitation will be treated as a Serious Incident by AHF as outlined in AHF's Complaints and Whistleblowing Policy, and detailed in the Serious Incident Reporting Procedures and Form (Annexes C and E). The Serious Incident Reporting Procedures and Form are duplicated in Annex C and D of this Child Safeguarding Policy. AHF Serious Incident Reporting Procedures will be followed at all times. (See also [www.australianhimalayanfoundation.org.au/complaints](http://www.australianhimalayanfoundation.org.au/complaints))

AHF will treat all concerns raised seriously, ensure that all parties are treated fairly and that the principles of natural justice are taken into account. All reports will be handled professionally, confidentially and efficiently.

## 5.11 Sanctions

Failure to report incidents or allegations of incidents, policy non-compliance, proven allegations of improper conduct relating to children and non-compliance of this Policy or the Child Safeguarding Code of Conduct by AHF personnel, partners or representatives may result in disciplinary action, including termination of contract or employment, reporting to authorities and/or legal action. As noted above,

should a person pose an unacceptable risk to children, AHF is committed to preventing that person from working or having contact with children.

Any personnel who fails to meet training requirements will require a reassessment of duties and performance management until compulsory safeguarding training activities are complete.

## **6. ROLES AND RESPONSIBILITIES**

Creating a safe working environment within AHF and within partner organisations is everyone's responsibility and failure to act on concerns or disclosures relating to child abuse or exploitation is not an option.

### **6.1 Board and CEO**

The Board and CEO will publicly commit to child safety, champion a child safe culture and ensure that supervision practices and people management have a child safety focus.

It is the responsibility of the Board and CEO to ensure effective child safeguarding mechanisms across all AHF areas of operations. This includes partner organisations.

AHF Board Directors are ultimately accountable for this Policy and supporting the Chair and/or the CEO in investigating serious incidents and providing a response.

The AHF CEO has prime responsibility for upholding this Policy. The CEO is the incident reporting focal person as per AHF's Serious Incident Reporting Procedures. Incidents that involve the CEO are reported to the Chair. **For contact details, see Annex E.**

Incident reports will be provided to the Board as a standing item on the Board agenda.

### **6.2 Managers**

Managers and senior employees are responsible for ensuring that AHF Child Safeguarding policy and procedures, in particular reporting procedures, are understood and implemented by the employees, other personnel and volunteers under their supervision and responsibility, and the partner organisations with whom they work. They are also responsible for the creation and maintenance of an environment which safeguards children and promotes the implementation of AHF codes of conduct.

Each manager can act as a resource person for questions about what constitutes child safeguarding or policy non-compliance.

### **6.3 Employee**

All employees have responsibility to comply with AHF's Child Safeguarding Policy. Employees in charge of a particular project will ensure partners are familiar with AHF's incident reporting process including the CEO's contact details. They may assist the partner in this process when necessary.

All AHF employees and in-country partners are obliged to report any suspicions or actual report of child abuse or exploitation. This can be done without sharing details of cases where information has been provided in confidence. Anonymous reports can be lodged on [AHF's online complaints and incident reporting form](#). Failure to report is a breach of AHF's policy and could lead to disciplinary action being taken.

#### **6.4 Child Safeguarding Officer and Incident Reporting Focal Person**

AHF's Head of Programs will be the delegated employee responsible for the safeguarding of children for the Australian Himalayan Foundation. The Child Safeguarding Officer advises the Board, CEO and staff about child safeguarding matters. The CEO is the incident reporting focal person as per AHF's Serious Incident Reporting Procedures. Incidents that involve the CEO are reported to the Chair. **For contact details, see Annex E.**

### **7. REVIEW OF POLICY**

AHF's Child Safeguarding Policy will be formally reviewed every two years to assess its relevance and effectiveness and ensure that it meets current standards and legislation, including applicable criminal codes. The CSO will manage the review which will be reported to the AHF Board and relevant employees and other stakeholders will be consulted in the process.

### **8. LEGISLATIVE, REGULATORY AND POLICY FRAMEWORKS**

- ACFID Code of Conduct
- Child Protection Policy, DFAT, 2017
- Child Protection Guidance Note, Establishing Child Protection Risk Context, DFAT, January 2018
- Convention on the Rights of the Child, United Nations, 1989
- Optional Protocol to the United Nations Convention on the Rights of the Child on the sale of children, child prostitution and child pornography, United Nations, 2002
- Optional Protocol to the United Nations Convention on the Rights of the Child on the involvement of children in armed conflict, United Nations, 2002
- Geneva Declaration of the Rights of the Child, United Nations, 1924
- International Labour Organization Convention 182 Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, ILO, 1999
- Criminal Code Act 1995 (Divisions 272, 273, 474)
- Child Protection (Working with Children) Act 2012 (NSW) – and other state and territory child protection legislation

## ANNEX A DEFINITIONS OF KEY TERMINOLOGY

*Bullying*: the inappropriate use of power by an individual or group with an intent to injure either physically or emotionally.

*Child abuse*: physical, sexual, emotional, neglect, bullying, child labour and family violence.

*Child and young person*: any person under the age of 18 years (unless otherwise under national laws).

*Child protection*: specific activities (at times underpinned by legislation) undertaken to prevent and respond to children who are being abused or maltreated.

*Child Safeguarding*: denotes measures to protect the health, well-being and human rights of individuals, which allow children, young people and vulnerable to live free from abuse, harm and neglect.

*Child sex tourism*: the commercial sexual exploitation of children by men or women who travel from one place to another.

*Children in emergencies*: especially vulnerable to abuse exploitation as part of a traumatised and displaced population.

*Duty of care*: responsibility to provide children with an adequate level of protection against harm.

*Emotional abuse*: Emotional abuse is the ongoing emotional maltreatment of a child. It's sometimes called psychological abuse and can seriously damage a child's emotional health and development.

*Exploitation*: the use of a child in work or other activities for the benefit of others.

*Exposure to family violence*: when children and young people witness or experience the chronic domination, coercion, intimidation or victimisation of one person by another by physical, sexual or emotional means.

*Informed consent*: When a contributor grants permission to publish their story with full knowledge of the possible consequences, including possible risks and benefits. Informed consent must be granted without duress. Ensures the child and the parent or guardian understand the implications, purpose and potential uses of photographs or videos.

*Neglect*: persistent failure or the deliberate denial to provide a child with clean water, food, shelter, sanitation, supervision or care.

*Physical abuse*: when a person purposefully injures or threatens a child or young person.

*Sexual abuse*: when a child or young person is used by an older or bigger child, adolescent or adult for his/her sexual stimulation/gratification.

*Vulnerable children:* all children are vulnerable by definition of their age. Those especially vulnerable are those in institutions, at work, in war or in emergencies.

## ANNEX B AHF CHILD SAFEGUARDING CODE OF CONDUCT

I, \_\_\_\_\_, agree that while involved in AHF-funded aid activities,

### I will:

- Comply with AHF Child Safeguarding Policy and Procedures.
- Treat children with respect regardless of race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Ensure I respect, protect and fulfil children's rights in my work and activities.
- Comply with all relevant Australian and local legislation, including labour laws in relation to child labour.
- Wherever possible, ensure that another adult is present when working in the proximity of children.
- Encourage open communication between all children, young people, parents, employees and volunteers and have children and young people participate in the decisions that affect them.
- Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any medium (see also 'Use of children's images for work related purposes').
- Immediately report instances, concerns or allegations of child abuse in accordance with the procedures outlined in this document.
- Immediately disclose all charges, convictions and other outcomes of an offence, which occurred before or occurs during my association with AHF that relate to child exploitation and abuse.
- Take responsibility for ensuring that I am accountable and do not place myself in positions where there is a risk of allegations being made; and avoid behaviours that could be perceived by others as child exploitation and abuse.
- Self-assess my behaviours, actions, communications, language and relationships with children.
- Consult with the Child Safeguarding Officer or other relevant employees if I have any questions regarding child protection and how it relates to my work/relationship with AHF.
- Be a positive role model for children.

### I will not

- Engage in behaviour that is intended to shame, humiliate, belittle, degrade or exploit children.
- Use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Engage children in any form of sexual activity or acts, including paying for sexual services or acts.
- Do things of a personal nature that a child can do for him/herself, such as assistance with toileting or changing clothes.
- Develop relationships with children that may be deemed exploitative or abusive.
- Seek to make contact and spend time with any child or young person outside the program times.
- Connect with or form relationships with children and young people online met through AHF work, such as on social media platforms.
- Show favouritism through inappropriate attention or the inappropriate provision of gifts.
- Invite unaccompanied children into my home/hotel or other private location, unless they are at immediate risk of injury or in physical danger.
- Condone, overlook or participate in behaviour of children that is illegal, unsafe or abusive.
- Sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible.
- Hold, kiss, cuddle or touch a child in an inappropriate, unnecessary or culturally insensitive way.
- Use physical punishment on or violence against children.
- Give or provide children with alcohol, tobacco, legal drugs that are prescribed for the child or any illegal drugs.

- 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.

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

**When photographing or filming a child for work related purposes, I must:**

- Before photographing or filming a child, assess and endeavour to comply with local traditions or restrictions for reproducing personal images. If unsure - inquire as to local traditions and restrictions.
- Before photographing or filming a child, obtain consent from the child **and** a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
- Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and the fact.
- Ensure electronic 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

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

**I will adhere to AHF's CHILD SAFEGUARDING CODE OF CONDUCT:**

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

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

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



**ANNEX C INCIDENT REPORTING PROCEDURES**

*[These procedures are duplicated here from AHF Complaints and Whistleblowing Policy Annex C]*

**Serious Incidents include any suspected or actual incident, concern or allegation involving: CHILD ABUSE & EXPLOITATION; SEXUAL MISCONDUCT; FRAUD & CORRUPTION; TERRORISM; BULLYING, HARASSMENT, DISCRIMINATION; OR ANY CRIMINAL ACTIVITY**

Complaints made by persons who are eligible Whistleblowers under section 6.2 of AHF’s Complaints & Whistleblowing Policy, and which amount to Whistleblowing Disclosures, are dealt with exclusively within section 6 of the policy.

- **Anyone** can raise a concern, make a complaint or report an incident to AHF about something they have experienced or witnessed.
- It is **mandatory** for all AHF and Partner Board and Committee members, employees, volunteers, contractors and representatives to report below:

<b>A</b>	<b><u>WHAT TO REPORT?</u></b>
	<ul style="list-style-type: none"> <li>● All concerns related to the safety of children and young people.</li> <li>● Any incident, concern or allegation of child abuse, sexual exploitation and abuse.</li> <li>● Any suspicions or incidences of inappropriate behaviour towards others that could be associated with sexual grooming, exploitation or trafficking.</li> <li>● Inappropriate use of the Foundation’s photographic equipment or computers, including evidence of child pornography.</li> <li>● Any suspected or actual behaviour or activity relating to child abuse, sexual exploitation and abuse, fraud, corruption, bribery, terrorism.</li> <li>● Any suspected or actual criminal behaviour of activity.</li> <li>● Any suspected or actual breach of AHF’s: Code of Conduct, Child Safeguarding Policy, Child Safeguarding Code of Conduct, PSEA Policy, Fraud and Anti-Corruption Policy, Counter-Terrorism Policy, Conflict of Interest Policy.</li> </ul> <p><b>Note:</b> reports can be made about anyone associated with AHF and its programs including Board and Committee members, employees, volunteers, contractors, representatives and AHF partner personnel, or anyone else acting on behalf of AHF.</p>

<b>B</b>	<b><u>WHEN TO REPORT? - immediately</u></b>
	<ul style="list-style-type: none"> <li>● When an incident or concern has been raised, it must be reported <b>immediately</b> (as soon as practicable if communication is restricted). This can be done on behalf of somebody else and may only involve referring a suspicion.</li> <li>● It is the responsibility of personnel to promptly report a breach (not to investigate it).</li> </ul>

<b>C</b>	<b>HOW AND TO WHOM?</b>
	<ul style="list-style-type: none"> <li>● Promptly report verbally or in writing (on paper or in an email) to the most senior staff member on site (or phone if no other staff on site). Keep a dated diary entry outlining the details of the conversation, as well as the person’s name to whom you made the report.</li> <li>● Senior staff member to immediately advise AHF CEO (or AHF Chair if incident concerns the CEO) and key staff within partner organisation as per its own reporting process.</li> <li>● <i>Distance the alleged perpetrator.</i> The best interest of the victim or complainant may warrant standing down the alleged perpetrator if a volunteer or employee (with full pay to recognise entitlement to just processes) until the matter is closed.</li> <li>● Ask the person affected by the incident whether they would like a support person present whilst the incident is documented (by most senior staff member on site). Ensure the support person understands the importance of confidentiality.</li> <li>● If the alleged perpetrator is the guardian (or anyone else close to the child), there should be a clear process to exclude this person from the interview process that involves the child.</li> <li>● Complete serious incident form in as much details as possible - treat it as highly confidential.</li> <li>● Where safe to do so, and when in accordance with the wishes of the complainant/survivor, all alleged sexual abuse or physical assault incidents should be reported through the correct local law enforcement channels. Only record minimal information and refer to the police.</li> </ul>

<b>D</b>	<b>INVESTIGATION</b>	
	<p>In liaison with the relevant employee and/or partner representatives, and in consultation with a representative from the AHF Board, the CEO will investigate the situation, discuss the allegations and decide upon the next step. This may involve any or all of the following:</p> <ul style="list-style-type: none"> <li>● Reporting to local police / child protection authorities / Australian Federal Police (AFP);</li> <li>● Reporting to DFAT within 24 hours if the project is supported by DFAT or any project is in breach of DFAT minimum standards.</li> <li>● Reporting any suspected or actual terrorist threat or activity to the national security hotline, the AFP and to DFAT if the matter relates directly or indirectly to DFAT funding.</li> </ul> <p>Inquiries and investigations cannot involve the individual(s) who are the subject of the allegation. This also must not include any individual/s who may have a personal relationship with or conflict of interest, relating with the person who is the subject of the concern or allegation.</p>	
	<p><b>POSSIBLE STEPS IN INVESTIGATION</b></p> <ul style="list-style-type: none"> <li>● Conduct additional interviews with the person/s who made the allegations, other witnesses to gather more information;</li> <li>● Conduct interview/s with the alleged offender;</li> <li>● Gather other relevant evidence when possible;</li> <li>● If deemed appropriate, suspend the person whom the allegations have been made against from duties with pay during the investigation.</li> </ul>	<p><b>POSSIBLE OUTCOMES OF INVESTIGATION</b></p> <ul style="list-style-type: none"> <li>● Take no further action;</li> <li>● Further education on the CS Policy, PSEA Policy and AHF Codes of Conduct;</li> <li>● Formal warning and monitoring;</li> <li>● Transfer to alternative duties;</li> <li>● Dismissal/end of contract/end of volunteer engagement.</li> <li>● Referral to law enforcement.</li> </ul>

**ALLEGATION AGAINST YOU**

If an allegation is made against you, then you must inform your line manager immediately. You should also promptly complete an incident report form recording the details as you recall them and send to AHF CEO and key staff within partner organisation as per its own reporting process.

E	ALLEGATION AGAINST PARTNER PERSONNEL	POSSIBLE OUTCOMES OF INVESTIGATION
	<ul style="list-style-type: none"> <li>● If AHF receives a complaint about partner personnel, AHF expects the partner to respond quickly and appropriately.</li> <li>● AHF should assist the partner organisation to ascertain its obligations under local law to refer the matter to the police or other statutory authorities for criminal investigation where appropriate.</li> <li>● Where initial enquiries indicate that further investigation is necessary, and where appropriate, AHF should work with the partner to address the issue through an appropriate independent investigation.</li> <li>● If the investigation concludes that an abuse has occurred, specific actions will be agreed with the partner and the partner will ensure they are implemented, as well as provide AHF with the necessary evidence, confirmation and assurances.</li> </ul>	<ul style="list-style-type: none"> <li>● Take no further action;</li> <li>● Further education on CS Policy, PSEA Policy, and AHF Codes of Conduct;</li> <li>● Formal warning and monitoring;</li> <li>● Transfer to alternative duties;</li> <li>● Dismissal/end of contract/end of employee/ stakeholder engagement.</li> <li>● Suspension of agreement with partner pending implementation of specific actions;</li> <li>● End of agreement with partner.</li> </ul>

**FAIRNESS AND CONFIDENTIALITY**

- AHF will treat all concerns raised seriously. All parties, including the accused, will be treated with respect, fairly and justly. All reports will be handled professionally, confidentially and expediently. They may be shared only as required by law or to facilitate investigation.
- The identity of the victim, the person reporting the incident and the alleged person will be kept confidential throughout the reporting and investigation processes.
- The person against whom the allegation is made will be given the opportunity to present their view of the events in question. AHF will withhold its findings and determination until the investigation is fully completed.

**RECORD KEEPING**

- All records of incidents, investigation procedure and outcomes will be kept by AHF.
- At the request of the complainant or survivor, AHF will de-identify complaints.

**REPORTING AND DISCLOSURE BY A CHILD**

- If a child discloses abuse, s/he must be taken seriously and treated with respect, care and concern.

- If the child requests that no-one be told of the matter, employees must seek advice from the most senior staff member on site who should consult with the AHF CEO and key staff within partner organisation as per its own reporting process on how the child can be supported and the disclosure process managed, ensuring the best interests of the child are carefully considered at all stages of the process.
- Every effort will be made to ensure and protect the identity, rights and safety of the child throughout any investigation.

<b>AHF:</b> <a href="mailto:info@ahf.org.au">info@ahf.org.au</a> (+612) 9438 1822
AHF CEO, Angela Ford, <a href="mailto:angela@ahf.org.au">angela@ahf.org.au</a> ; <a href="mailto:complaints@ahf.org.au">complaints@ahf.org.au</a>
AHF Head of Programs, <a href="mailto:corinne@ahf.org.au">corinne@ahf.org.au</a> ; <a href="mailto:info@ahf.org.au">info@ahf.org.au</a> ;
AHF Chairperson, Simon Balderstone, <a href="mailto:simon@waysandmeans.com.au">simon@waysandmeans.com.au</a>
<b>DFAT - ANCP funded projects:</b> <a href="mailto:ancp@dfat.gov.au">ancp@dfat.gov.au</a>
DFAT CS Incident: <a href="mailto:childwelfare@dfat.gov.au">childwelfare@dfat.gov.au</a>
DFAT PSEA incident: <a href="mailto:seah.reports@dfat.gov.au">seah.reports@dfat.gov.au</a>
DFAT Fraud incident: <a href="mailto:fraud@dfat.gov.au">fraud@dfat.gov.au</a>
DFAT Terrorism incident: <a href="mailto:counter-terrorism.resourcing@dfat.gov.au">counter-terrorism.resourcing@dfat.gov.au</a>
<b>OTHER key contact details for serious incidents:</b>
ACFID: <a href="mailto:code@acfid.asn.au">code@acfid.asn.au</a>
ACNC: <a href="mailto:advice@acnc.gov.au">advice@acnc.gov.au</a> , 13 22 62
National Security Hotline (Terrorism): 1800 123 400 (inside Australia) +61 1300 123 401 (outside Australia)
AUSTRALIAN FEDERAL POLICE: (02) 9286 4000

**ANNEX D      SERIOUS INCIDENT REPORT FORM**

*[This form is duplicated here from AHF Complaints and Whistleblowing Policy Annex E]*

<b>HOW TO USE THIS FORM</b>	
<b>PURPOSE</b>	<p>This form is to be filled out to report and/or respond to concerns in relation to any suspected or actual incident, concern or allegation involving:  <b>CHILD ABUSE &amp; EXPLOITATION, SEXUAL MISCONDUCT, FRAUD, CORRUPTION or TERRORISM</b></p> <p>Complaints made by persons who are eligible Whistleblowers under section 6.2 of AHF’s Complaints &amp; Whistleblowing Policy, and which amount to Whistleblowing Disclosures, are dealt with exclusively within section 6 of the policy.</p>
<b>FREQUENCY</b>	<p>It is <b>mandatory</b> for all AHF Board members, employees, volunteers, representatives and AHF partner Board members, employees and volunteers to immediately report concerns or allegations related to: child abuse and exploitation, sexual misconduct, fraud, corruption and terrorism. For any concern raised, AHF will immediately follow AHF Serious Incident Reporting Procedures.</p>
<b>COMPLETED BY</b>	<p>Australia: AHF CEO, AHF Chair or AHF Head of Programs  Overseas: Most Senior Staff Member, CEO, Manager, Safeguarding Officer or AHF point of contact (as per partner’s own serious incident procedures)</p>
<b>This document is to be treated confidentially.</b>	

<b>1. Name(s) of person reporting and contact details (if not confidential)</b>	
Name:	Telephone:
Position:	Email:
<b>2. Name(s) of Person completing this form (e.g., AHF CEO or Chair, or partner most senior staff member or point of contact (as per partner’s own serious incident procedures))</b>	
Name:	Telephone:
Position:	Email:
Date and time the incident was reported you:	

**3. Reporting Partner Organisation**

Partner Organisation:	Country:
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**4. Type of Allegation/ Incident / Concern**

Please circle, highlight or mark the most appropriate description(s) of alleged incident:

<ul style="list-style-type: none"> <li>● Family/ Domestic Violence</li> <li>● Sexual Abuse/Sexual Misconduct</li> <li>● Sexual Harassment</li> <li>● Physical Abuse</li> <li>● Psychological Abuse</li> <li>● Bullying</li> <li>● Neglect</li> </ul>	<ul style="list-style-type: none"> <li>● Terrorism</li> <li>● Fraud</li> <li>● Bribery</li> <li>● Corruption</li> <li>● Criminal behaviour or activity</li> <li>● Other: <i>(detail, e.g. domestic violence, child labour, child marriage)*</i></li> </ul>
Further details if known (date, time & place of incident/ when was report received?):	Other relevant details: (for example vulnerability, or disability factors):

**5. Details of the Incident/s, or allegation, or match against proscribed terrorist list,**

Provide details of incident/s, or match against proscribed terrorist list, or allegation:

**6. Details of Person(s) / organisation(s) against whom the allegation has been made**

Name of organisation(s):	
Address:	
Contact details:	

Name of individual(s):	Sex:
Date of birth:	Nationality:
Contact details:	
Employer/ Partner/ Project:	
<p>Please circle, highlight or mark the most appropriate descriptor of the alleged perpetrator (you can mark more than one):</p> <ul style="list-style-type: none"> <li>● Representative of: <ul style="list-style-type: none"> <li>○ AHF</li> <li>○ PARTNER ORGANISATION [name] _____</li> </ul> </li> <li>● Australian Citizen or Permanent Resident</li> <li>● Employee</li> <li>● Contractor including sub-contractor or consultant</li> <li>● Volunteer/intern</li> <li>●</li> </ul>	
<p><b>7. Details of Victim(s) / Survivor(s)</b>  <i>(leave this section blank if not applicable (e.g., organisational fraud))</i></p>	
Name (if not confidential):	Sex:
Date of birth:	Nationality:
Contact details:	
Age of the victim at time of alleged incident:	Was the victim a child at the time of the incident? Yes / No
<p>Is the victim/survivor in immediate danger or risk of harm? Yes / No</p> <p>If yes, what steps have been taken to remove the victim/survivor from harm?</p>	
<p>Have any injuries been observed or reported?</p>	

Has the victim/survivor been assessed by a medical professional? If yes, provide details.

Have the victim/survivor wishes been considered and taken into account in any decisions or changes proposed or actioned to increase their safety? If yes, provide details.

If the victim/survivor is a child, what consultation has taken place with the child's parents/guardians?

If the victim/survivor is a child, does he/she have siblings living in the same house? If yes, how many?

Have the siblings been assessed for safety? If yes, provide details and results of assessment.

Has the victim/survivor alternate placement been assessed for safety and appropriateness?

**8. Name and contact details of witness (separate incident report form to be completed)**

Name Witness 1:	
Contact details Witness 1:	
Name Witness 2:	
Contact details Witness 2:	
<i>Add more lines if necessary</i>	



9. Further Details	
<p>Are local police, health professionals or another local authority aware of the incident/ allegation? Yes / No</p> <p>If the Police/ authority were contacted, please provide the following information:</p> <p>Date:</p> <p>Time:</p> <p>Police/ Authority agency name:</p> <p>Police/ Authority officer's name:</p> <p>Police/ Authority officer's office location:</p> <p>Police/ Authority officer's phone:</p> <p>Have the Police/ Authority advised that a police investigation is required?* Yes / No</p> <p>Name of Authority who provided this advice:</p> <p><i>[*If yes, note in section 12 below that follow up is required to ensure police investigation happened, and police report obtained]</i></p> <p>Name and position of person responsible for follow up with police:</p>	
What other authorities have been informed?	
Has DFAT been contacted if relevant?	
Has the AFP (where relevant) been advised or consulted? If so, what is their response or proposed action?	
What actions relating to the incident have already occurred?	

10. Is there any other pertinent information for assessment or management of this incident?
11. Has an internal investigation been initiated? Yes / No
<p>If yes, provide details:</p> <p>Date:</p>
12. Note and track further information and actions:

Name, Position and Signature of person reporting and date	
Name, Position and Signature of most Senior Staff member on site and date	
Name, Position and Signature of representative of partner organisation as per its own reporting process and date	
Name and Signature of AHF CEO (or AHF Chairperson if the incident concerns the CEO) and date	



## ANNEX E CHILD SAFEGUARDING CONTACT PEOPLE

See [AHF Website, complaints webpage](http://australianhimalayanfoundation.org.au/complaints): [australianhimalayanfoundation.org.au/complaints](http://australianhimalayanfoundation.org.au/complaints)

### AHF Incident Reporting Focal Person

**AHF CEO**

**phone: (02) 94381822**

**email: [info@ahf.org.au](mailto:info@ahf.org.au)**

**post: PO BOX 553, CROWS NEST NSW 1585, AUSTRALIA**

**For current CEO contact details see AHF website**

### AHF Child Safeguarding Focal Person

**AHF Head of Programs**

**phone: (02) 94381822**

**email: [info@ahf.org.au](mailto:info@ahf.org.au)**

**post: PO BOX 553, CROWS NEST NSW 1585, AUSTRALIA**

**For current Head of Programs contact details see AHF website**

### OTHER Key Child Safeguarding contacts:

**AHF CHAIR**

**phone: (02) 94381822**

**email: [info@ahf.org.au](mailto:info@ahf.org.au)**

**post: PO BOX 553, CROWS NEST NSW 1585, AUSTRALIA**

**For current Chair contact details see AHF website**

### AHF Head of Communications and Fundraising

**phone: (02) 94381822**

**email: [info@ahf.org.au](mailto:info@ahf.org.au)**

**post: PO BOX 553, CROWS NEST NSW 1585, AUSTRALIA**

**For current Head of Communications and Fundraising contact details see AHF website**