

CHILD SAFEGUARDING POLICY

1. POLICY STATEMENT

Australian Doctors International (ADI) has a zero-tolerance approach to child exploitation or abuse. At ADI, we acknowledge that children are more vulnerable due to their age and recognise that it is a shared responsibility of all adults to prevent child exploitation and abuse. As such, ADI integrates child safeguarding into all aspects of its operations, including strategic planning, programming, decision-making, performance management and staffing of the organisation. The aim of this policy is to protect communities from potential harm caused by ADI or partner staff during ADI activities.

2. PURPOSE

ADI is committed to protecting the safety and security of children and young people; this Policy sets out the requirements to mitigate those risks that may arise in relation to the safety and security of children. The purpose of the Policy to enable mitigation, identification, and monitoring of child safeguarding incidents and ensure that all program activities are conducted in a child safe context.

For the purpose of ADI's Child Safeguarding Policy and any Child Safeguarding matter, a child is regarded to be any person under the age of 18 years. It is the responsibility of the appointed Child Safeguarding Officer (CSO) to monitor, review and coordinate child safeguarding training and procedures.

3. SCOPE

This policy applies to all ADI Personnel, representatives, and key stakeholders who work with ADI projects or programs, including contractors, sub-contractors, consultants and partner staff.

Any person engaged by or with ADI that has contact with children as a part of that engagement must abide by this policy.

4. EXCLUSIONS

The policy does not need to be signed by people engaged by ADI who will have no contact with children. These people must be made aware of the policy and required to sign and adhere to it if their contact with children status changes.

5. DEFINITIONS

Child	In accordance with the United Nations Convention on the Rights of the Child, 'child' means every human being under the age of 18. The Lukautim Pikinini Act 2015 also defines a child as a person including a boy or girl child under the age of 18 years. For the purposes of this policy, ADI considers a child to be a person under the age of 18 years.
Child abuse	Child abuse or maltreatment constitutes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect, negligent treatment, commercial or other

	forms of exploitation, resulting in actual or potential harm to a child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power. Both boys and girls can suffer all types of child abuse. Children often experience more than one type of abuse simultaneously.
Child Exploitation:	Child exploitation is any actual or attempted abuse of a position of vulnerability, differential power, or trust, for purposes for profiting sexually, monetarily, socially, or politically from exploitation of another. This includes the use of a child in work or other activities for the benefit of others that is unacceptable because it deprives them of their childhood, education, development, or dignity. It also includes unacceptable child labour, child prostitution or trafficking, and child pornography.
Child labour:	Work that deprives children of their childhood, their potential, and their dignity and/or interferes with their schooling, or that is harmful to physical and mental development.
Child pornography:	In accordance with the Optional Protocol to the Convention on the Rights of the Child, 'child pornography' means 'any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes.
Child Protection:	An activity or initiative designed to protect children from any form of harm, particularly that arising from child exploitation and abuse.
Child Safeguarding:	The broad obligation on Personnel and partners to ensure that the design and delivery of programs and organisational operations do not expose children to adverse impacts, including the risk of abuse and exploitation, and that any concerns about children's safety within the communities where ADI and its partners work are appropriately reported.
Emotional abuse	A continuing pattern of inappropriate verbal or symbolic acts toward a child or failure over time to provide a child with adequate nurturing and emotional availability. Emotionally abusive behaviour includes threats, rejection, isolation, belittling, and name calling.
Grooming:	Behaviour that makes it easier for an offender to procure a child for sexual activity. This can occur in person or through electronic equipment. For example, an offender might build a relationship of trust with the child, and then seek to sexualise that relationship by encouraging romantic feelings or exposing the child to sexual concepts through pornography.
Physical abuse	The use of physical force against a child that results in harm to the child. Physically abusive behaviour includes shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling or poisoning.
Personnel	Personnel in this policy refers to ADI staff, including board members, permanent employees and contractors, casuals and volunteers.
Harassment	Unwanted or unreasonable contact or behaviour which intimidates, humiliates or offends
Harm	Any detrimental effect or impact on a child's physical, psychological or emotional wellbeing. Harm may be caused by all forms of physical, emotional, sexual abuse, neglect or exploitation whether intentional or unintentional.
Neglect	The failure by a parent or caregiver to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for the child's physical and emotional development and well-being.
Sexual abuse	The actual or threatened physical intrusion of a sexual nature whether by force or under unequal or coercive conditions. Child sexual abuse is the use of power or authority to involve a child in sexual activity by another person. Sexually

	abusive behaviours can include touching genitals or breasts, masturbation, oral sex, vaginal or anal penetration by a penis, finger or any other object, and exposing the child to sex or pornography.
Unacceptable risk	The level of identified risk that cannot be tolerated by the organisation that must be either eliminated or controlled. For people deemed to pose an unacceptable risk, control mechanisms are not considered acceptable.

6. ROLES AND RESPONSIBILITIES

Board	<ul style="list-style-type: none"> - Responsible for managing Child Safeguarding risks across the organisation and ensuring appropriate measures are in place to manage and mitigate risk within the organisation's operations
Senior management	<ul style="list-style-type: none"> - Ensure child safe recruitment, including screening of all staff and specific questions relating to child safeguarding during interviews. - Monitor and ensure compliance with ADI Code of Conduct and Child Safeguarding Policy and Safeguarding Code of Conduct (appendix 1) - Induct new staff, including information and training on child safeguarding - Arrange annual child safeguarding refresher training - Conduct screening and risk assessment of partners - Undertake child protection risk assessment as part of program design - Monitor child protection risks during program implementation - Ensure information held about children, including images depicting children adhere to the Ethical Stories Policy and is safely stored - Report to authorities suspected or known instances of harm or abuse in line with our procedures - Report to DFAT, other donors and authorities any Child Safeguarding incidences as required by contractual partnership and funding agreements. - Ensure that stakeholders and partners understand and adhere to ADI Child Safeguarding Policy, and this is included in MOU's and Project Agreements.
ADI Personnel	<ul style="list-style-type: none"> - Comply with ADI's Code of Conduct and Child Safeguarding Policy and Code of Conduct - Be alert to any child safeguarding risks - Identify and seek continued understanding of child safeguarding through training - Ensure incidents that breach the Child Safeguarding Policy and Code of Conduct are reported and recorded through the appropriate mechanisms
Partners	<ul style="list-style-type: none"> - Comply with screening and risk assessment at commencement and over the life of the partnership - In absence of Partners own Child Safeguarding Policy, partner will sign and comply with ADI's Child Safeguarding Policy and Code of Conduct - Report all safeguarding risks, concerns and incidents to ADI
External contractors and stakeholder	Read understand and abide by ADI's Child Safeguarding Policy and Code of Conduct in all their engagements with ADI where they come into contact with a child

7. POLICY PRINCIPLES

This policy is underpinned by these key principles:

ADI has a Zero tolerance of child exploitation and abuse	ADI has a zero tolerance of child exploitation and abuse which will be emphasised through trainings and awareness of this policy to ensure that its staff and partners are kept informed about their roles and responsibilities to minimise the risks of child exploitation and abuse.
Assess and manage child protection risks	Through the trainings on the policy and procedures, all Personnel and partners ensure that child protection risks are assessed and managed appropriately through the agreed procedures and process to ensure that risks are prevented across all ADI programs and operations
Sharing responsibility for child protection	ADI acknowledges that Child Protection is a shared responsibility and therefore through regular trainings on this policy and procedures ensures that its staff and partners are aware and informed about their obligations and take appropriate actions to integrate into their respective spectrum of work and know when and who to report to.
Procedural fairness	ADI will be responding to concerns of child exploitation and abuse will uphold procedural fairness when making decisions that affect a person's rights or interest.
Recognition of best interest of the child	Both Australia (1990) and Papua New Guinea (1993) are signatories to the United Nations Convention on the Rights of the Child (UNCRC) and therefore ADI is committed to upholding and promoting the rights of the children and any actions concerning children will be in their best interest.

8. POLICY IN ACTION

ADI acknowledges that safeguarding children is a shared responsibility and, in its prevention, reporting and responding approaches will ensure that the best interests of the child are recognised and upheld.

ADI is committed to ensuring that all its Personnel and partners receive training and contextualised support on this Policy and relevant procedures, ADI Personnel and Partner staff must demonstrate an understanding of the risks to children within and across programs and operations and engage effective strategies to mitigate exploitation and abuse.

ADI is committed to ensuring that its Personnel and partners know when to report and who to report to when any concerns arise and when responding, apply a child-driven approach to address concerns and protect children's well-being.

9. RECRUITMENT

ADI takes all reasonable precautions to ensure that its Personnel do not pose unacceptable risk to children.

As outlined in ADI's Recruitment Policy, Volunteer Management Policy and Contracting Consultants Policy, ADI will consistently apply robust recruitment procedures for all staff, including:

- Criminal record check
- At least two verbal reference checks
- Behavioural-based interview questions
- ADI's statement on Child Safeguarding is stated in all job descriptions and Employment contracts.

10. EDUCATION AND TRAINING

ADI will provide all new Personnel with a child safeguarding briefing during onboarding in which they will be introduced to the ADI Child Safeguarding Policy and ADI Child Safeguarding Code of Conduct within three months of commencement. All Personnel are required to undertake the ACFID Child Safeguarding and ACFID Code of Conduct on-line training.

Refresher training on the Policy and the Safeguarding Procedures will be provided to all Personnel at least annually.

11. PARTNERS

At a minimum it is expected that partner organisations will have their own child safeguarding policy and procedures that are compliant with DFAT minimum standards. ADI acknowledges the challenge and cultural differences of working in Papua New Guinea where practices and cultures related to the protection of children are not the same as Australia, and organisations may not have child safeguarding policies in place. In these instances, it is required that partner organisations adopt, sign and comply with ADI's Child Safeguarding Policy and Code of Conduct (Appendix1) for the duration of activities, and undergo capacity development support in order to develop appropriate policies, procedures and implementation plans.

12. MARKETING AND COMMUNICATIONS

ADI undertakes a range of precautions when sharing information about children in all marketing and communications. General principles include protecting the identity of children, obtaining free and prior image consent from a parent or guardian, and complying with Ethical Stories Policy and Communications Policy.

In line with ADI's Ethical Stories Policy, when capturing images of children ADI Personnel must adhere to strict guidelines:

We will not take images of children:

- Without clothing, where private body parts are exposed, shirtless, where nipples and chest are exposed
- That depict them in a sexualised manner
- Without free and prior written consent from a parent or guardian

- Depict children in a dehumanising manner
- That manipulates or distorts the reality of the situation

13. REPORTING AND RESPONDING

13.1. Connected to ADI programs, personnel and/or partner staff

This policy covers concerns and incidents related to all paid and unpaid Personnel of ADI and partner organisations.

All ADI Personnel must inform ADI when they have a reasonable belief that a child has been harmed or is at risk of harm.

Any ADI staff needing further advice on reporting incidents and concerns should contact the National GEDSI Coordinator as the Safeguarding Focal Point safeguarding@adi.org.au

13.1.1. Incidents

Incidents that must be reported include but are not limited to:

- An observation or disclosure (by an adult or child) of actual harm or abuse to a child;
- A breach of ADI's Code of Conduct, Child Safeguarding Code of Conduct, Child Safeguarding Policy and Procedures
- Child pornography or child abuse that is received through ADI electronic equipment

You are aware that an individual involved with ADI or a partner organisation has abused a child outside of work (a family member, domestic worker or through prostitution);

Within 24 hours of becoming aware of the incident you must inform one of the following ADI contact points:

- Provincial safeguarding focal point (Provincial Program Manager)
- National Program Director
- National GEDSI Coordinator
- CEO

A report can also be made anonymously through the feedback form on ADI's website. <https://www.adi.org.au/feedback-complaints>

Following DFAT's Child Safeguarding Reporting Procedure, the Child Safeguarding Focal Point will submit a report on the incident using the DFAT Child Safeguarding Incident Notification Form to DFAT via childwelfare@dfat.gov.au.

It is the contact point's responsibility to report to DFAT via childwelfare@dfat.gov.au. This can be done in-person, via email or phone. All reports must be followed up with an Incident Notification Form as soon as possible.

Where the contact point has already reported, but becomes aware of additional information, contact point must also report that information.

Incidents which have occurred will be formally investigated and responded to by the responsible role in consultation with the CEO.

Reporting guidelines should follow the ADI Safeguarding Reporting and Response Procedure.

13.2. Issues or Concerns

Concerns that must be raised include but are not limited to:

- A suspicion, suggestion or indication of actual or potential harm or abuse to a child;
- A concern that ADI programs or activities may not be meeting the requirement of child protection or creating child safe spaces
- A concern with the behaviour of an ADI personnel or partner staff

Concerns should be raised with one of the following ADI contact points:

- Provincial safeguarding focal point (Provincial Program Manager)
- National Program Director
- National GEDSI Coordinator
- CEO

A report can also be made anonymously through the feedback form on ADI's website.

<https://www.adi.org.au/feedback-complaints>

All concerns raised will be investigated and responded to appropriately. Appropriate responses may include:

- Investigations
- Improvement of policies, procedures and training
- Improvement of program approaches
- Performance management, suspension or termination of Personnel

13.3. Incidents Unconnected to ADI programs, personnel and/or partner staff

Where a child unconnected to ADI programs approaches any ADI Personnel for help with an issue or concern of abuse or exploitation that has no connection with any ADI Personnel or programs, or an adult approaches ADI on their behalf, ADI Personnel will assist where they can. This assistance may include but is not limited to:

- Transport to safe location or support service.
- Transport and other support with reporting the incident to the police.
- Support accessing medical care.

14. POLICY BREACHES

Non-compliance with the minimum child protection standards outlined in this Policy may lead to suspension or termination of funding, or employment/volunteer/contractor agreements.

ADI can terminate or remove any individual including ADI personnel or partner staff who has been accused, charged, arrested, or convicted of a criminal offence relating to child exploitation and abuse or considers that an individual poses a risk to a child's safety or well-being from any ADI activities.

ADI also requires anyone under formal investigation for offences relating to child exploitation and abuse to be suspended from duty or transferred to other duties during an investigation.

ADI reserves the right to terminate contract negotiations, refuse to engage an individual, or require an individual to be replaced if appropriate criminal record checks are not undertaken, or cannot be undertaken for roles that are identified as working with or having contact with children.

15. RISK MANAGEMENT

ADI acknowledges that the work we do is inherently associated with child safeguarding risks. In the interest of mitigating risks, ADI applies child risk assessments to every new project and program. The risk assessment is reviewed quarterly, and mitigating factors are put in place to reduce, avoid or remove the risk to children and vulnerable adults.

RELEVANT LEGISLATION

Legislation	Jurisdiction
Division 272 (child sex offences outside Australia)	DFAT
Division 273 (offences involving child pornography material or child abuse material outside Australia)	DFAT
Division 474 (telecommunications offences, subdivision C)	DFAT
Crimes Act 1914	
Criminal Code Act 1995,	PNG
Lukautim Pikinini Act 2015	PNG