



CHILD SAFEGUARDING POLICY

APPLICABILITY: ACCI Missions & Relief Staff, Volunteers, Field Workers, Associates, Relief Partners & Board Members (See Scope)

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INTRODUCTION

PREAMBLE

There is no higher standard of just human interaction than that required of us by God and laid out for us in the Bible. God in his nature embodies love and justice, and expects our relationships and interactions with others, including children, to be based on the same principles. In fulfilling our responsibilities, we protect each other's rights. This is captured today in what we call Human Rights.

Human rights are based on an understanding that all people are created equally and have equal value and equal dignity before God, affirmed not just in creation but also in redemption. All humans, and therefore all children, regardless of age, race, gender, social background, religion, disability and/or belief, hold human rights equally.

GUIDING DOCUMENTS

ACCI support and uphold the rights of children as outlined in the UN Convention on the Rights of the Child (UNCRC) and the Convention on the Rights of Persons with Disabilities (CRPD), as we believe that protecting the most vulnerable is evidence of our love for God and all His creation.

ACCI is also guided by Australian national and state frameworks, laws and policies around child protection and safeguarding¹.

OUR COMMITMENT TO CHILD SAFEGUARDING

ACCI Missions & Relief (ACCI) is committed to:

- Promote the care, protection and wellbeing of children in a way that recognises their right to grow in a safe and stable environment and their right to be protected from harm;
- Ensure ACCI projects respond appropriately to the needs of children in a way that fosters their health, development and dignity;
- Identify and mitigate both immediate and cumulative risks to children in the context of ACCI activities;
- Recognise the family as the primary means of providing for the nurture, care and protection of children; and
- Provide and promote a child safe culture that is understood, endorsed and put into action by all ACCI stakeholders.

¹ For more information visit - aifs.gov.au/cfca/publications/australian-child-protection-legislation.

Note: Child Safeguarding vs Child Protection

This policy has been titled 'Child Safeguarding Policy' to reflect a move in the sector towards differentiating these terms.

Child Protection describes various actions taken by government, organisations and others to protect children from all forms of abuse, violence and exploitation. It includes national policies, laws, frameworks and programs related to issues involving children and their rights.

Child Safeguarding refers to the individual responsibility and duty of care of organisations to keep children safe and promote their wellbeing in the context of their program/organisation. This involves ensuring their staff, operations and programs do no harm to children or do not expose children to risk of harm or abuse.

PURPOSE

The purpose of this Child Safeguarding Policy (CSP) is to outline the preventative and responsive measures ACCI has in place to safeguard children and ensure the care, protection and wellbeing of children is promoted. This policy aims to achieve this by:

1. Demonstrating ACCI's commitment and approaches to child safeguarding;
2. Outlining the expectations and responsibilities of ACCI stakeholders;
3. Providing guidance on how to respond to concerns and allegations of child abuse; and
4. Setting high standards around personal behaviour in a code of conduct that must be adhered to by all ACCI stakeholders.

Note: What if I'm unsure or have questions regarding the contents of ACCI's Child Safeguarding Policy?

While this policy aims to be comprehensive, given the diverse range of settings and activities carried out by ACCI stakeholders, it is likely that there may be circumstances not covered by the policy or questions that arise regarding the policy's application. In such situations, please contact ACCI for advice and clarification at childprotection@acci.org.au.

SCOPE

Those who fall within the scope below are required to **read, agree and adhere to the ACCI Child Safeguarding Policy and Code of Conduct** (Appendix 1).

This policy applies to all **ACCI Stakeholders** defined below.

- All ACCI **Staff** including but not limited to employees, contractors and consultants.
- All ACCI **Volunteers** including but not limited to office and event-based volunteers.
- All ACCI **Field Workers**.
- All ACCI **Associates**.
- All ACCI **Relief Partners** including any organisation receiving ACCI funding in Australia or abroad to implement activities including but not limited to community development, disaster response or non-development activities.
- All ACCI **Board Members**.

For the purpose of this policy, stakeholder expectations and responsibilities have been divided into three categories based on level of interactions with children.

Low Risk	Medium Risk	High Risk
<p>ACCI Stakeholders who do not have contact with children</p> <p><i>(For example, leadership training, vocational training or developing resources)</i></p>	<p>ACCI Stakeholders who have contact with children</p> <p><i>(For example, programs that involve children like church planting or community strengthening)</i></p>	<p>ACCI Stakeholders who work with children or are child focussed organisations.</p> <p><i>(For example, child-focused programs like tutoring or early education child protection programs, residential care, trafficking interventions etc)</i></p>

Note: Stakeholder Categories

- Please make note of which stakeholder category and risk rating you are part of, as this will be referred to throughout the policy. If unsure, please contact ACCI for clarification.
- For the purpose of this policy, donors and beneficiaries are not defined as ‘stakeholders’.

RELATED POLICIES

- ACCI Communications Policy
- ACCI Disability Inclusion Policy
- ACCI Policy Regarding Visitors and Volunteers in Residential Care Projects
- ACCI Complaints Handling Policy
- ACCI Disaster Management and Response Guidelines
- ACCI Prevention of Sexual Abuse, Exploitation and Harassment

REVIEWING THE POLICY

ACCI Missions & Relief’s Child Safeguarding Policy and Code of Conduct will be reviewed **every three years**.

ACCI General Managers and members of the field team will manage the review and stakeholders will be consulted during this process.

1. PREVENTATIVE ACTIONS

This section outlines the proactive measures and strategies needed to ensure ACCI's staff, operations and programs not only protect children and avoid harm, but also promote the wellbeing and best interests of children.

1.1 CHILD SAFE RECRUITMENT & SCREENING

ACCI is committed to child safe recruitment. ACCI acknowledges that child abusers or sex offenders often seek employment or volunteer placements in organisations that work with children. Therefore, ACCI recruitment practices aim to recruit the safest and most suitable staff, field workers and volunteers and deter those who wish to harm children from seeking engagement with ACCI.

The following process will be followed when recruiting all ACCI staff, all ACCI field workers and for volunteers who will work directly with children or during unsupervised field visits.

1. Advertise

All recruitment advertisements for staff or volunteer positions or information for prospective field workers include ACCI's commitment to child safeguarding and child-safe recruitment.

2. Review Applications

A detailed application or resume is required for all applicants, including information regarding the applicant's previous employment, education and experience.

3. Interview

All short-listed candidates or field worker applicants will be interviewed. Positions that include direct contact with children or unsupervised overseas travel must include a child safety screening component which will explore the candidate's motivations for and experience working with children.

4. Screen

The following is required for all short-listed candidates or applicants:

- **Police Check.**
- **Working with Children Check** (or equivalent for the state/territory). Successful applicants must keep this check renewed throughout their employment, volunteering or time as a field worker.
- **Reference Checks.** A minimum of two non-related referees will be contacted verbally and asked specific questions regarding the candidate's suitability to work with or be in contact with children.

ACCI reserves the right to refuse employment to any person that poses an unacceptable risk to children.

Minimum Expectation: ACCI Field Workers, Associates and Partners	Low	Med	High
Develop or ensure your organisation/ministry has adequate recruitment and screening practices covering staff, volunteers and short-term teams. <ul style="list-style-type: none"> • At a minimum, recruitment practices should include: <ul style="list-style-type: none"> ○ criminal background checks*; ○ reference checks (verbal and minimum of two recommended); and ○ a child safety screening component during interviews for positions working directly with children. • Strategies to ensure team members coming via other sending agencies or organisations have undergone sufficient child safe screening. <p><i>*ACCI understands that criminal background checks in the countries our stakeholders work in can be difficult to gain and/or unreliable. However, we expect stakeholders to utilise whatever screening mechanisms exist in-country to discharge their duty of care and to support the development of these mechanisms. In the rare situation where no mechanisms exist, stakeholders must ensure a more detailed reference check process is followed.</i></p>	✓	✓	✓

✓ Requirements
❖ Recommended

Note: Short-Term Missions

ACCI has developed an online training and toolkit to equip our field workers, partners, and others to develop and implement effective, ethical and child-safe short-term mission programs. Visit - <https://ethicalmissionstrips.org>.

1.2 RISK MANAGEMENT

Careful and ongoing risk management, especially during the design and planning stage of a project or activity, can reduce the risk of child abuse and exploitation occurring within projects and activities. All projects present potential risks to children, however projects that work directly with children require more stringent risk management.

ACCI completes an Inherent Child Safeguarding Risk Assessment (Appendix 4) for all field workers at induction, and relief partners at onboarding and renewal of a project. This will determine their risk level and identify the next steps to mitigating those risks.

Child safeguarding and child risk management are factored into project monitoring cycles including being incorporated into regular field worker and relief partner reporting processes and monitoring trips.

Minimum Expectations: Field Workers, Associates and Partners	Low	Med	High
Complete an inherent Child Safeguarding Risk Assessment (Appendix 4)	✓	✓	✓
Conduct a full child safeguarding risk assessment and update your Child Protection/Safeguarding Policy and other procedures accordingly (<i>contact ACCI for resources and guidance</i>).		❖	✓

✓ Requirements Recommended
❖

Note: Safe Environments for Children

Without thorough risk management, our activities and choices can cause unintentional harm and create risk for the very children we intend to support. This is especially the case when selecting locations for our programs and activities. For example:

- *Renting a cheaper facility on the outskirts of a town may result in children facing harms when travelling to and from the location;*
- *Running programs at locations that cannot be accessed by children with disability further reinforces stigma and increase inequality; or*
- *Selecting a building with closed off spaces can lead to inability to comply or enforce adequate supervision (two-adult rule) resulting in an increased likelihood of abuse occurring.*

Therefore, field workers and partners should consider:

- *Transport – is it far from the target group or community, is there public transport, will children be travelling to and from the program unaccompanied in an unsafe community?*
- *Physical space – are there hazards in or near the building, are there stairs or other barriers that would prevent children with physical disabilities participating?*
- *Supervision – do we have enough staff to ensure children are always supervised, are there lots of rooms or spaces where children could be unsupervised and at risk of abuse (including child-to-child abuse), are there windows/open spaces to ensure greater accountability?*

Ideally these factors should be assessed prior to starting activities to reduce extra costs associated with altering programs later.

SPECIFIC RISK PROGRAM AREAS

More thorough risk management is also needed for the following specific risk program areas:

a. Disaster Response and Humanitarian Emergencies

Disaster situations can have a disproportionately negative impact on the immediate and long-term wellbeing and development of children. Disasters often disrupt the social patterns or groupings that protect children and exacerbate pre-existing risks to children caused by entrenched poverty, power disparities and weak social protection frameworks. Some individuals also take advantage of the chaos to exploit and harm children.

For this reason, ACCI is committed to ensuring that we uphold our commitment to child protection and safeguarding throughout all our disaster relief responses. ACCI stakeholders involved in disaster relief responses must comply with the ACCIR Disaster Management and Response Guidelines.

b. Children with Disabilities

ACCI subscribes to the social model of disability, which views disability as the combination of impairments plus barriers in a person's environment (these barriers can be physical, communication, social or attitudinal). Addressing the barriers people face, or the failure to do so, will therefore impact the person's experience of disability. Children with disabilities face heightened risks of harm due to their dual vulnerability as children and the impact that such barriers, such as stigma and exclusion, have on their life. Failing to ensure full participation of children with disabilities in programs and ministries can contribute to this stigma and exclusion, negatively impacting their long-term development and deepening their experience of disability.

ACCI is committed to ensuring, through all programs, that proactive measures and strategies are taken to ensure the inclusion, participation and equal opportunity for children with disabilities. ACCI stakeholders must comply with the *ACCI Disability inclusion policy*.

c. Residential Care

Research overwhelmingly suggests that residential care is rarely in the best interests of children. It can have significant impact on their development, place a child at high risk of abuse and children often leave institutions as young adults hyper-vulnerable to exploitation².

ACCI will only partner with field workers or relief partners working in or operating residential care programs that are:

- operating in alignment with the UNCRC, Alternative Care Guidelines and national laws and minimum standards. This includes being able to demonstrate robust gatekeeping and reintegration policies and practices to ensure residential care is only ever used as a temporary and last resort option; and
- committed to and outworking the goals and principles of ACCIR's Kinnected deinstitutionalisation program. This will include actively working towards reducing the use of long-term residential care through reintegration and reunification programs, family-based alternative care, family preservation and family and community strengthening.

ACCI will not partner with field workers or relief partners working in or operating residential care programs that do not fall under the scope of the above.

d. Volunteering in or Visiting Residential Care

Volunteering within residential care centres can be harmful to children and exposes children to unnecessary risks. It has also been identified as a significant driver of institutionalisation and orphanage trafficking, and the facilitation of orphanage tourism has been recognised by the Australian Government as a form of child exploitation and modern slavery.

ACCI is committed to not facilitating orphanage tourism through sending, organising or receiving teams (of non-stakeholders) for the purpose of volunteering or visiting a residential care centre. ACCI requires all stakeholders to comply with the '*ACCI Policy Regarding Visitors and Volunteers in Residential Care Projects*'.

1.3 MEDIA & COMMUNICATIONS

Children's situations evoke strong emotional responses, however, we must be careful not to exploit this and instead put the child's best interests and safety above the desire to share an impacting image or story.

Below is a summary of ACCI's policies regarding the use of children's images and stories. See ACCI's Communication Policy for more information.

² Williamson, J & Greenberg, A (2010) 'Families not orphanages' Better Care Network
Csaky, C (2009)'Keeping children out of harmful institutions' Save the Children Fund

In all communications, **ACCI commits to:**

- ✓ Respect the rights of every child including their rights to protection, privacy and to have their opinions heard and participate in decisions affecting them.
- ✓ Ensure that the best interests of each child are protected over any other consideration.
- ✓ Ensure children are presented 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.
- ✓ Comply with local laws, traditions or restrictions for reproducing personal images of children.
- ✓ Interview children in a sensitive manner and only when a parent or guardian is present.
- ✓ Present the context of the child accurately and the role or impact of the project in context of other supporting factors in the child’s life (e.g. family, community, local church or support group)
- ✓ Ensuring children’s private information is not make publicly available including details of their specific location. Therefore, the GPS tracking function must be disabled on equipment when filming or photographing children.
- ✓ Ensure extra care and sensitivity is taken when using images and information of children who are survivors of abuse, exploitation or disaster situations.
- ✓ Take a child’s views into account in accordance with their age and maturity.
- ✓ When taking photographs or recording stories of a child under 14 years old, or a child aged 14-18 years old that cannot give informed consent, consent must be gained from a parent or guardian.
- ✓ Written consent (Appendix 5) is required if:
 - Photographing children in the context of culturally or politically sensitive or high-stigma issues.
 - The photo or story clearly identifies and provides substantial information about a child.
 - The individual is the sole focus of a story.
 - Taking images or film of individuals in clinical settings or private settings.
- ✓ When using images or information about a child in the context of an ACCI project or ministry, all ACCI stakeholders must assess the level of risk and follow the below guidelines of what can and can’t be revealed:

Risk to Child	What Can Be Revealed
Low Risk:	Faces, full names and geographical location may be revealed. Children are much more vulnerable and for this reason children will never be classified as low risk.
Medium Risk:	Faces, pseudonyms (limited cases first names will be permitted) and vague geographical location may be revealed.
High Risk:	Faces and visuals to be concealed, pseudonyms to be used and locations will be changed.
Significant Risk:	ACCI will not publish any information or images when there is significant risk of harm and stigma.

In all communications, **ACCI will avoid:**

- ✗ Publishing a story or an image which might put the child or others at risk of stigmatisation or harm even when identities are changed, obscured or not used.

Minimum Expectation: All ACCI Stakeholders	Low	Med	High
Be familiar and comply with the ACCI’s Communications Policy.	✓	✓	✓
Ensure any teams, volunteers or contractors are aware and abide by communication guidelines.	✓	✓	✓

✓ Requirements
 ◆ Recommended

1.4 CHILD INVOLVEMENT & PARTICIPATION

The right for children to be heard, taken seriously, and be involved in decisions that affect them is one of the fundamental values of the UNCRC and key to the fulfilment of all other child rights. Ensuring children’s views are heard and valued contributes towards children’s development, leads to more informed decision-making, and serves to protect children who are not silenced in the face of abuse, violence or discrimination.

ACCI is committed to increasing child and youth participation. This could include ensuring that when working directly with children, ACCI field workers and partners:

- provide opportunities for children’s views to be heard and then incorporate these views into projects and policies (e.g. child-led committees, child-friendly feedback forms, small group discussions). This includes involving children and young people in decisions regarding if and how their stories and images should be used and how they wish to be portrayed; and
- develop child/youth friendly reporting and complaints mechanisms (e.g. protective behaviours training, posters, suggestion boxes).

Where appropriate, ACCI will also consult children in a manner appropriate to their age and maturity when conducting monitoring trips.

1.5 TRAINING & AWARENESS

All ACCI stakeholders have a role to play in upholding and promoting the rights, protection and wellbeing of children. Therefore, we need to ensure we are equipped and trained to outwork our responsibilities.

ACCI is committed to educating all stakeholders to:

1. Ensure they understand their obligations under this Child Safeguarding Policy;
2. Increase their awareness of child protection and exploitation;
3. Equip them to recognise risks to child safety and implement child safeguards; and
4. Ensure they understand their obligations to report concerns or suspicions and are aware of the appropriate way to report.

Minimum Expectation: <u>All ACCI Stakeholders</u>	Low	Med	High
Child Safeguarding policy to be agreed to on induction	✓	✓	✓
Review Child Safeguarding Policy during Code of Conduct annual refresher course	✓	✓	✓
ACCI Staff to complete Child Protection training upon induction	✓	✓	✓
Complete the ACC Safer Churches refresher training every 3 years.	ACC credential holders or as requested		

✓ Requirements
 ◆ Recommended

1.6 PARTNER & FIELDWORKER POLICIES

Having clear policies and procedures outlining strategies for preventing harm and promoting the wellbeing of children is vital for all organisations working with children. It is also important that everyone is aware of appropriate reporting procedures in the countries they work.

Minimum Expectation: <u>All ACCI Field Workers, Associates</u>	Low	Med	High
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Agree to and abide by ACCI's Child Safeguarding Policy and Code of Conduct.	✓	✓	✓
If you directly engage staff or volunteers in implementing activities, ensure they agree to and abide by ACCI's Child Safeguarding Policy and Code of Conduct (or local equivalent)	✓	✓	✓
Consider the Child Safeguarding practices of the organisations you collaborate with	❖	❖	✓
Develop or ensure you have in-country reporting procedures and controls that reflect local child protection laws.	❖	❖	✓
If you effectively control a local organisation for implementing your activities, the develop or ensure your organisation has their own child safeguarding/ protection policy and code of conduct that: <ul style="list-style-type: none"> meets ACCI's minimum standards; addresses the risks identified in your Child Safeguarding risk assessment; includes an in-country reporting process that reflects local child protection laws; must be read and signed by all staff and volunteers; and outlines regular training and reviews of implementation. 	❖	❖	✓

✓ Requirements
❖ Recommended

Minimum Expectation: Partners	Low	Med	High
Agree to and abide by ACCI's Child Safeguarding Policy and Code of Conduct.	✓	✓	✓
Document and implement Child Safeguarding Controls that: <ul style="list-style-type: none"> Ensure your organisation has in-country reporting procedures that reflect local child protection laws Staff and volunteers to sign code of conduct Addresses safeguarding risks identified in risk assessment Review Controls annually 	❖	✓	✓
Develop or ensure your organisation has their own child safeguarding/ protection policy and code of conduct that: <ul style="list-style-type: none"> meets ACCI's minimum standards; addresses the risks identified in your Child Safeguarding risk assessment; includes an in-country reporting process that reflects local child protection laws; must be read and signed by all staff and volunteers; and outlines regular training and reviews of implementation. 	❖	❖	✓
Develop or ensure your organisation has in-country reporting procedures that reflect local child protection laws.	✓		

✓ Requirements
❖ Recommended

Note: How to develop a Child Safeguarding Policy

ACCI has developed a range of resources and templates to assist field workers and partners to develop their own child safeguarding/protection policy. Email childprotection@acci.org.au for more details and support.

2. RESPONSIVE ACTIONS

This section outlines ACCI's process and procedures for responding to child safeguarding reports, incidents and allegations.

2.1 REPORTING PROCEDURES

Responding to and reporting child protection incidents and concerns is dependent on numerous factors, including the type of incident being reported, who the incident involved, and where the incident occurred. The following section provides guidance on how to appropriately respond based on these varying factors.

All ACCI stakeholders must respond appropriately to the following:

1. Any incident, belief or suspicion of abuse or exploitation;
2. Non-compliance with the Child Safeguarding Policy or failure to safeguard a child; and
3. Concerns regarding the safety or wellbeing of a child.

Refer to the below procedures and the ACCI Child Safeguarding Incident Response Flowchart (Appendix 5) for detailed guidance on how you are expected to respond.

1. ANY INCIDENT, BELIEF OR SUSPICION OF ABUSE OR EXPLOITATION

Including:

- Reports, allegations, observations or concerns that a child has been abused, exploited, is being groomed or is at risk of significant harm.
- Reports pertaining to the possession of child exploitation material.
- Becoming aware that an ACCI stakeholder or staff member/volunteer of an ACCI funded program has been accused of, charged with, arrested for, or convicted of criminal offences relating to child abuse or exploitation.

Who does it involve?	Do I need to report or notify ACCI?	How will the report be handled by ACCI?
<p>1.1 ACCI Stakeholder Individuals</p> <ul style="list-style-type: none"> - Refer to Scope (includes ACCI staff, volunteers, field workers, associates, and board members). 	<p>Report to ACCI’s CSO immediately and according to Incident Response Flowchart (Appendix 5).</p>	<p>ACCI will immediately launch an investigation and develop an investigation plan in alignment with Section 2.2 below.</p>
<p>1.2 ACCI Funded Program</p> <ul style="list-style-type: none"> - Involves allegations against staff or volunteers or any abuse that occurred within a program. - Involves allegations of abuse that occurs to a beneficiary regardless of location. - Applies to ACCI relief partner programs and any third-party program or activity that received ACCI funding (downstream funding). 	<p>Report to ACCI’s CSO within 72 hours according to Incident Response Flowchart (Appendix 5).</p> <p>Provide ACCI with completed incident reporting form</p>	<p>Partner led investigation will be overseen and supported by ACCI.</p> <p>If ACCI is not satisfied with the report and investigation, we reserve the right to launch our own investigation.</p>
<p>1.3 Non ACCI Stakeholder/Program</p> <ul style="list-style-type: none"> - Involves an allegation that was witnessed by or disclosed to a stakeholder but did not involve an ACCI stakeholder and did not 	<p>Notify ACCI.</p> <p><i>Note: For organisations who make regular reports, a summary can be provided in your ACCIR 6-month report.</i></p>	<p>The stakeholder is responsible for reporting the incident appropriately according to the national or state legislative framework. This could be the police or a child protection INGO or helpline.</p> <p>ACCI will document the case when notified.</p>

<p>occur to a beneficiary within an ACCI funded program or activity.</p> <ul style="list-style-type: none"> - Involves allegations that need to be reported in-country to discharge duty of care. 		<p>The ACCI CSO is available to provide advice to give confidence that the stakeholder has been reported appropriately.</p>
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2. NON-COMPLIANCE WITH THE SAFEGUARDING POLICY OR FAILURE TO SAFEGUARD CHILDREN

Including any activities or practices that:

- do not protect the best interests of the child (fail to implement reasonable child safeguards); or
- do not meet applicable local laws or standards.

Who does it involve?	Do I need to report or notify ACCI?	How will the report be handled by ACCI?
<p>2.1 ACCI Stakeholder</p> <ul style="list-style-type: none"> - The concern or incident of non-compliance involves an ACCI stakeholder (See Scope). 	<p>Report to ACCI’s CSO.</p>	<p>ACCI will determine what action should be taken based on the severity of the allegation and in consultation with relevant parties.</p> <p><u>Minor Breaches</u></p> <ul style="list-style-type: none"> • Responses may include providing further education regarding this policy, the importance of child safeguarding and outlining consequences of ongoing non-compliance. <p><u>Serious Breaches</u></p> <ul style="list-style-type: none"> • ACCI will respond in accordance with the ‘Complaints Handling Process’ outlined in the ACCI Employee/Field Worker Handbook. • If complaint involves an ACC credential holder, the ACC National Office may be notified in alignment with ACC <i>Grievance Procedure for Certificate Holders</i>. • If a complaint involves an ACC relief partner and reasonable action is not taken to address the concern, ACCI will end the partnership.
<p>2.2 ACCI Funded Program</p> <ul style="list-style-type: none"> - A team member, volunteer or visitor to your organisation or project fails to abide by your Child Protection/Safeguarding Policy. 	<p>Notify ACCI if a serious breach occurred that resulted in formal action (e.g. dismissal of staff or volunteer). You can notify ACCI in the quarterly field worker reports or ACCIR 6-monthly reports.</p>	<p>ACCI stakeholders should follow the procedures outlined in their own Child Protection/Safeguarding Policy and other organisational policies including staff disciplinary procedures and volunteer/visitor policies.</p> <p>If unsure, contact ACCI CSO for guidance.</p>

3. CONCERNS REGARDING THE SAFETY OR WELLBEING OF A CHILD

ACCI stakeholders should also respond to serious concerns about the wellbeing of a child where there is no suspicion or belief of abuse or exploitation but where the situation may warrant intervention or support from child protection or social service providers.

Who does it involve?	Do I need to report or notify ACCI?	How to respond to concern?
3.1 Any Child	Only required to notify ACCI if concern escalates to a situation involving abuse or exploitation (see 1.3).	The stakeholder should refer the case to the relevant government agency or child welfare organisation designated to handle these concerns. If the child is in Victoria, the ACCI CSO will contact or advise you to contact Child FIRST (see Appendix 6).

Note: What if I am unsure how to respond to something?

Contact the ACCI Child Safeguarding Officer who will be able to advise you. This conversation will remain confidential. You can also refer to the 'ACC Safe Churches Workbook' or the 'ACCI Missions and Relief Child Protection Induction' training, which outlines the grounds for reasonable belief or suspicion of child abuse.

Contact Details

ACCI Child Safeguarding Officer (CSO)

childprotection@acci.org.au

1300 997 502 or +61 3 8516 9600

44 Lakeview Drive, Suite 525, Scoresby Vic 3179

If the allegation is against the CSO, reports can be directed towards **ACCI's General Manager:**

complaints@acci.org.au

1300 997 502 or +61 3 8516 9600

44 Lakeview Drive, Suite 525, Scoresby Vic 3179

2.2 RESPONDING TO REPORTS OF ABUSE OR EXPLOITATION:

How ACCI responds to issues of non-compliance (2.1-2.2) and concerns regarding a child's safety or wellbeing (3.1) is covered in the above section. This section provides more detail guidance on ACCI's response to a belief or suspicion of child abuse or exploitation (1.1-1.3).

When a belief or suspicion of child abuse or exploitation is reported, the ACCI Child Safeguarding Officer (CSO) will act immediately by launching an investigation and developing an investigation plan based on established procedures and in accordance with the ACCI Complaints Handling Procedure. All reports will be appropriately investigated no matter who the alleged perpetrator is.

When applicable, the incident is reported to the police, government agencies or other relevant organisations:

- If the child is in Australian jurisdiction, the concern will be immediately reported according to the relevant state reporting requirements as well as according to the 'In Australia' section of the ACCI Child Safeguarding Incident Response Flowchart (Appendix 5).
- If the child is outside of the Australian jurisdiction, a report should be made according to the national legislation and reporting framework of the given country/state, as well as according to the 'Overseas' section of the ACCI Child Safeguarding Incident Response Flowchart (Appendix 5).
- ACCI must report all child protection allegations of a criminal nature directly to the police. The police will advise whether the internal investigation needs to be suspended whilst the police investigation is underway. In such cases, ACCI will ensure risk management strategies are put into place to protect children (e.g. an individual subject to the allegation may be stood down until an investigation is complete).
- If the incident occurs within an ACCI funded activity involving an Australian and is classified as a 'reportable allegation' under the Victorian Reportable Conduct Scheme, ACCI are required to make a report to the Victoria Commission for Children and Young People.
- If the person subject to an allegation holds an ACC state issued credential, the Child Protection Officer will immediately report the concern to the relevant State/ Territory ACC office.
- If the incident occurs within a DFAT funded activity a report will be made to DFAT

During the investigation:

- The CSO will lead the investigation with other members of senior management and if deemed appropriate an ACCI board member or ACC representative.
- The CSO will ensure relevant laws and legislative procures are followed (external legal advice will be sought when required).
- The reporter, victim and person subject to an allegation will be treated with respect from the start of the process until the case is closed.
- External counselling will be provided if necessary to those involved.
- If the child is in Australia and requires extra support or protection, the CSO will coordinate with local social services organisations in Australia in coordination with the relevant ACC State Child Protection Officer. If the child is overseas the CSO will provide guidance to the in-country partner or field workers in regard to sourcing support through local social services.
- Person subjected to an allegation may be stood down or partnership suspended.
- If deemed to be in the best interests of children, an ACCI stakeholder subject to an allegation may be stood down during the course of the investigation. This process does not indicate guilt or innocence. If the individual is an employee or field worker they will continue to receive full pay and other entitlements.
- If the allegation is organisational; involves an ACCI relief partner; if it is considered in the best interests of children; or if the organisation is non-cooperative, then ACCI may suspend the partnership (including discontinuing accepting or disbursing funds) until the investigation has concluded and an acceptable resolution has been achieved.
- The investigation will be considered top priority until closed.

WHAT HAPPENS IF THE INCIDENT IS PROVEN OR SUSPICION CREDIBLE?

In the event that an incident has been proven or there is credible suspicion, ACCI will automatically terminate a staff member, Field Worker or any other representative's association with the organisation. A

relief partner organisation, which according to ACCI, does not respond adequately to a proven incident or credible suspicion (e.g. this may include terminating staff or appropriately addressing risks) will have its partnership terminated.

Note: What if I am not satisfied with ACCI’s response?

If you are not satisfied with ACCI’s response you may contact an external organisation:

- In Australia- Department of Human Service. See: <http://www.dhs.vic.gov.au/for-individuals/crisis-and-emergency/reporting-child-abuse>
- Outside of Australia- The local organisation that is authorised to accept allegations (e.g. ‘Childline’).

Minimum Expectation: All ACCI Stakeholders	Low	Med	High
Immediately report or notify ACCI in alignment to the above reporting requirements.	✓	✓	✓
Have a clear understanding of child protection reporting processes and requirements in country of service.	✓	✓	✓
Have referral networks of appropriate child welfare organisations.		✓	✓

✓ Requirements
 ✓ Recommended

Note: What if I am unsure of how to report child protection incidents in the country I work?

It is vital that all ACCI stakeholders have knowledge regarding who to contact and how to respond if they are faced with a child protection incident. This information needs to be known before, not after, an incident has occurred. If you are unsure where to start, contact the government department responsible for child protection/welfare or an organisation who specialises in child rights. If they are unhelpful, keep contacting people until someone provides you with the information or support you need.

COMMITMENT

I, _____, have read and understood the above Child Safeguarding Policy and agree to adhere to it and the associated procedures in their entirety.

Sign: _____ Date: _____

SECTION 3: APPENDICES

APPENDIX 1: ACCI MISSIONS & RELIEF CODE OF CONDUCT

In accordance with ACCI's Child Safeguarding Policy all stakeholders (as defined by the Scope) are required to read, agree and adhere to the following Code of Conduct.

NOTE:

This Code has been divided into two parts to acknowledge the separation of boundaries that we have for children in our personal lives (your children and those of your family and friends) and those in our work and ministry lives.

- *Part One outlines commitments ACCI stakeholders must abide by at all times.*
- *Part Two outline commitments within work and ministry contexts.*

ACCI recognises that our stakeholders work and live in varying contexts and ministries. Therefore, if you have a concern about your ability to uphold any part of the Code of Conduct, please email childprotection@accir.org.au to discuss your concerns and we will endeavour to work with you to find a solution (see page 23 for more details).

I, (insert name) _____, as an ACCI staff/volunteer/field worker/associate/strategic partner/board member/other agree that while associated with ACCI:

PART ONE IN BOTH MY WORK/MINISTRY AND PERSONAL LIFE

I WILL:

1. Treat children with dignity and respect regardless of race, colour, gender, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
2. Listen to children, take their concerns seriously, and allow them to have a say in the decisions that affect them.
3. Provide children with a safe and protective environment.
4. Ensure that, whether residing in or visiting a country, I will always abide by Australian and local laws in regards to child protection and child labour at all times.
5. Ensure I am not in a position where there is a risk of an allegation being made.
6. Immediately disclose to ACCI management all charges, convictions and other outcomes of an offence, which occurred before or occurs during my association with ACCI that relates to child exploitation and abuse (see the ACCI Child Safeguarding Policy for details).

I WILL NOT:

1. Engage children under the age of 18 in any form of sexual intercourse or sexual activity, including paying for sexual services or acts.
2. Use language or behaviour towards children that is inappropriate or sexually provocative.
3. Physically assault or abuse children.
4. Use language or behaviour towards children that is intended to shame, humiliate, belittle or degrade children or otherwise perpetrate any form of emotional abuse.
5. Conduct or be part of harmful traditional practices, spiritual or ritualistic abuse.
6. 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, which places them at significant risk of injury or which does not adhere to child labour laws.

7. Use any form of media and technology (including but not limited to computers, mobile phones, video cameras, cameras or social media) to exploit or harass children.
8. View or access child pornography through any source or medium.
9. Participate in orphanage tourism/volunteerism including visiting or volunteering in a residential care centre where I am not a key stakeholder. I will also not be involved in facilitating orphanage tourism through sending, organising or receiving teams (of non-stakeholders) for the purpose of volunteering or visiting a residential care centre.

PART TWO IN ADDITION TO THE ABOVE, WITHIN MY WORK/MINISTRY LIFE

I WILL:

1. Be committed to creating a culture of openness and mutual accountability in my workplace/ministry, to enable all child safeguarding issues or concerns to be raised and discussed and where abusive behaviour is challenged.
2. Ensure that the risks of working alone are minimised by using the 'two-adult rule'. Whenever possible, I will ensure that another adult is present or within reach when I am working with children with whom I am in a position of trust or authority. If two staff members are not available, I will stay in public view or a trusted member of the family/community may accompany me and the child/ren.
3. Ensure that in any children's programmes, children will have privacy for all their personal needs such as toileting, changing, bathing and dressing.
4. I will comply with the ACCI Communications Policy, which states that to photograph or video a child I must obtain informed consent from the child and his/her parents/guardians (see Communications Policy for details).
5. Immediately report any concerns or allegations I have of child abuse in accordance with the ACCI Child Safeguarding Policy.

I WILL NOT:

1. Touch (including holding, hugging and kissing) a child in a way that is unnecessary or inappropriate to the culture or circumstance.
2. Do things of a personal nature for a child that they could do for themselves (such as assistance with toileting, bathing or changing clothes). Where a child cannot do such things for themselves, I will ensure I follow the "two adult rule".
3. Hit, smack or otherwise physically assault, punish or abuse children, even where this may be culturally acceptable.
4. Give or supply any child with alcohol or illegal drugs or be intoxicated or under the influence of alcohol or drugs prior to, or whilst, engaging with any child.
5. Spend time with a child alone, take a child to my own home or visit a child where I may be alone with that child. In the case where I have a friendship with the parents, which is not based on a position of trust, authority or dependency, and the parents give permission for me to care for the child, I may do so whilst maintaining the other commitments of this code.
6. Sleep in the same bed as a child.
7. Sleep in the same room as a child. If a child is sick, in hospital, in residential care or, for another reason, the child cannot sleep in a room alone and I am unable to organise a family member to stay with the

child, I will ensure that I follow the “two-adult rule” and that neither adult sleeps in the same bed as the child.

8. Show favouritism to children or give children preferential treatment based on (but not limited to) their age, race, gender, religion or place in local society.

This includes strongly advising against giving gifts to an individual child from you personally. Adults need to be aware that the giving of gifts can be seen as a gesture to bribe or groom a child and can contribute to a power imbalance that is to be minimised.

9. Exchange personal contact details with children.
10. Utilise workers/volunteers who pose a known risk to children’s safety.
11. Put photos, videos or other identifying information of a child on social media without informed consent from the child and his/her parents/guardians.

I understand that it is my responsibility to keep up to date with the latest ACCI child safeguarding information. It is also my responsibility to ensure that I adhere to the above Code of Conduct.

Signed: _____ **Date:** _____

Note: What if I have concerns about my ability to uphold the code of conduct?

ACCI understand that we each work and live in a variety of contexts and at times the boundaries between our work, ministry and personal lives may get blurred. However, ACCI believe that having an agreed standard will help to protect ourselves, our staff, our organisation, our ministries and most importantly the children who we engage with. ACCI have kept this, as well as the minimum standards expected, in mind when developing this Code.

It is important to note that if a concern was raised about you, the scope of an internal investigation would involve determining whether you breached the Code. Therefore, if you have a concern about your ability to uphold any of the above commitments in the ACCI Code of Conduct, please email us at childprotection@accir.org.au to discuss your situation. ACCI will endeavour to work with you to find a solution.

The below table will be used to log any concerns that you have raised about your ability to meet any of the points in this Code. It is important that you raise these concerns with ACCI and that we have documented our agreed actions.

INDIVIDUAL LOG OF CONCERNS

Code Number	Concern Raised	Agreed Action

APPENDIX 2: GLOSSARY

Bullying - Bullying is the inappropriate use of power by an individual or group, with intent to injure either physically or emotionally. It is usually deliberate and repetitive. The bullying may be physical or psychological (verbal and non-verbal).

- Physical bullying includes pushing, hitting, punching, kicking or any other action causing injury.
- Verbal bullying includes insults, taunts, threats and ridicules.
- Psychological bullying includes physical intimidation and ostracism.

Child and Young Person - A child or young person is regarded to be any person under the age of 18 years, regardless of whether a nation's laws recognise adulthood earlier.

Child Abuse - Abuse as defined by the Child Protection Act 1993 can be physical, emotional, sexual or in the form of neglect. Intervention is required where the child has suffered, or is likely to suffer neglect or abuse which is detrimental to the child's wellbeing.

- Physical abuse is commonly characterised by physical injury resulting from practices such as punching, beating, shaking, biting, burning or otherwise harming a child.
- Sexual abuse occurs when an adult or older child, uses their power or authority over the child or takes advantage of the child's trust to involve them in sexual activity. This sexual activity does not just mean sexual intercourse; it means any sexual activity including flashing, fondling, masturbating and oral sex.
- Emotional abuse tends to be a chronic behavioural pattern directed at the child/young person whereby their self esteem and social competence is undermined or eroded over time.
- Neglect is characterised by the failure to provide for the child/young person's basic needs. This can occur through direct and deliberate action or by omission or deliberate inaction to care for the child/young person.

Abuse happens to both male and female children of all ages, ethnicity and social backgrounds, abilities, sexual orientation, religious beliefs and political persuasion. Abuse can be inflicted on a child by both men and women, as well as by young people themselves. In some cases, professionals and other adults working with children in a position of trust also abuse children.

Child Exploitation - Child exploitation includes one or more of the following:

- Committing or coercing another person to commit an act or acts of abuse against a child.
- Possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material.
- Committing or coercing another person to commit an act or acts of grooming or online grooming³.

Child Exploitation Material - Material, irrespective of its form, which is classified as child abuse material or child pornography material⁴.

³AusAID (2013), *Child Protection Policy*.

⁴AusAID (2013), *Child Protection Policy*.

Child Protection - Child Protection is the term used to describe the responsibilities and activities undertaken to prevent or stop children being abused or maltreated.

Child Safeguarding - Safeguarding is a relatively new term which is broader than 'child protection' as it also includes prevention. Safeguarding has been defined as:

- All agencies working with children, young people and their families taking all reasonable measures to ensure that the risks of harm to children's welfare are minimised; and
- Where there are concerns about children and young people's welfare, all agencies taking appropriate actions to address those concerns, working to agreed local policies and procedures in full partnership with other local agencies.⁵

Child-Sex Tourism - ECPAT International defines child-sex tourism as:

'...the commercial sexual exploitation of children by men or women who travel from one place to another, usually from a richer country to one that is less developed, and there engage in sexual acts with children, defined as anyone aged under 18 years of age.' (ECPAT International, 2006)

Children in Emergencies - Children in emergencies are especially vulnerable to abuse and exploitation. In an emergency or crisis situation, children are extremely vulnerable when they become part of a displaced or traumatised population.

Duty of Care - Duty of Care is a common law concept that refers to the responsibility of the organisation to provide children with an adequate level of protection against harm. It is the duty of the organisation to protect children from all reasonably foreseeable risk of injury.

Exposure to Domestic Violence - Domestic violence occurs when children and young people witness or experience the chronic domination, coercion, intimidation and victimisation of one person by another by physical, sexual or emotional means within intimate relationships.

Grooming - Grooming is a process where the offender prepares the victim for sexual activity at a later time. Grooming does not necessarily involve any sexual activity or even discussion of sexual activity. For example, it may only involve establishing a relationship with the child, parent or carer for the purpose of facilitating sexual activity at a later time. Grooming can be conducted in person or online, for example via interaction through social media, web forums and emails. Offenders often establish friendships with not only the victim but also the parents or guardians to gain their trust. They look for or manipulate opportunities to be with their victims such as offering to babysit for busy parents, or offering to pick children up from school or take them to sport.

In some jurisdictions grooming can be a criminal offence even if no sexual activity, sexual discussion or exposures to indecent materials or intoxicating substances have taken place⁶.

Particularly Vulnerable Children - Children outside the family environment including those in institutions, at work, on the streets, in war zones and emergencies are particularly vulnerable to abuse.

⁵ Safeguarding Children (2005), The 2nd Joint Chief Inspectors Report on Arrangements to Safeguard Children. A broader definition can be found in Working Together to Safeguard Children.

⁶ Victoria Betrayal of Trust Factsheet

Reportable Allegation - A 'reportable allegation' under the Victorian Reportable Conduct Scheme is defined as any information that leads a person to form a 'reasonable belief' that a person has committed reportable conduct. The Act sets out the five types of reportable conduct, which are:

- sexual offences (against, with or in the presence of, a child)
- sexual misconduct (against, with or in the presence of, a child)
- physical violence (against, with or in the presence of, a child)
- behaviour that is likely to cause significant emotional or psychological harm significant neglect.

For more information - <https://ccyp.vic.gov.au>.

Voluntourism and Orphanage Tourism - The term voluntourism refers to volunteer placements, short-term visits or holidays that incorporate a volunteering component or a visit to a local development or welfare project, usually run by private organisations. Orphanage tourism refers specifically to voluntourism that occurs within orphanages or any form of residential care by someone who is not a key stakeholder or staff member of that specific residential care facility⁷.

Note: Unless otherwise stated all definitions are from or adapted from "ACFID Code of Conduct: Guidelines for the Development of a Child Protection Policy" (July 2008).

⁷ ACCI Policy Regarding Visitors and Volunteers in Residential Care Projects

APPENDIX 3: CONFIDENTIAL INCIDENT REPORTING FORM



In accordance with ACCI 's reporting procedures, any incident, belief or suspicion of a child protection violation is to be reported and the information passed on to the ACCI Child Safeguarding Officer. This includes child abuse, child exploitation, possession of child exploitation material or non-compliance with ACCI Child Safeguarding Policy. Activities or practices in ACCI projects that do not protect the best interests of the child or do not meet applicable local laws or standards must also be reported.

Please note:

- In no way, nor under any circumstances, is anyone on the field or in Australia to attempt to persuade someone not to notify, or even to delay notifying, authorities in the case of a child safeguarding concern.
- It is not your responsibility to investigate even for the purpose of gathering information for this form. It is sufficient to just report on what you observed, aware of or were told.

PART ONE: ABOUT YOU (Note: This form is to be filled out by the person making the report)

Name: _____

Contact Details (e.g. phone, email, address): _____

Relationship with ACCI (e.g. Field Worker, Employee, Volunteer etc): _____

Relationship with child: _____

PART TWO: CHILD'S DETAILS

Child's name (s): _____ Age: _____ Gender: F / M

Any other relevant details or issues to be aware of (e.g. cultural issue, disability, ethnicity, religion etc):

Who does the child live with (include address and contact details)? _____

Is the child aware of this referral? Yes/No Is the parent/guardian aware of this referral? Yes/No

Where is the child now? Is s/he in a place of safety and are there any immediate medical issues?

PART THREE: YOUR CONCERN

- Child safeguarding concern:
- Observed/suspected by yourself
- Disclosure by the child

Allegation made by (name & details) _____

Date(s), time(s) and location(s) of incident(s): _____

Who is the person suspected?

- ACCI Staff, Field worker or other representative
- Staff of an ACCI Strategic Partner
- Someone in the community

Name and other relevant details of person suspected (e.g. address, job position, relationship with child, etc.):

Details of Report

Please include the following:

- Details of the child safeguarding concern or incident (Include what is alleged to have happened? What were the circumstances etc)
- Write down exactly what the child or other person has said (in his/her own words) and what you said (NB: Do not ask the child leading question-record actual details)
- Observations made by you (e.g. observed injures, persons perceived emotional state etc. Mark which observations are fact or opinion)

Have local authorities/external agencies been notified? Yes/No Date of notification: _____

Explain (e.g. name of authorities/agency, advice received, actions etc):

Signature: _____ Date: _____

Date matter was referred: _____ Date responded to complainant: _____

Investigation: How was the investigation conducted? Who was involved in the investigation, roles and responsibilities? Include key dates of investigation.

Findings & Comments:

Actions: Include action taken and any continued follow-up needed.

Lessons Learned: Strengths and weaknesses in areas such as the Child Safeguarding Policy and its implementation and management etc.

Recommendations: To prevent possible child safeguarding violations and improve the investigation process in the future.

Report prepared by: _____

Signed: _____ Date: _____

General Manager Name: _____

Signed: _____ Date: _____

APPENDIX 4: INHERENT CHILD SAFEGUARDING ASSESSMENT



CHILD SAFEGUARDING INHERENT RISK ASSESSMENT STEPS

- PART 1 – Inherent Risk Assessment
- PART 2 – Identify Risk Rating for your Organisation
- PART 3 – Review current Child Protection Controls

PART 1 – Inherent Risk Assessment

Consider the below 3 questions in making an inherent risk assessment, and remember to consider your key categories of stakeholders:

- Staff including but not limited to employees, contractors and consultants;
- Volunteers including but not limited to office and event based volunteers;
- Members of your governing board; and
- Partners including any organisation or group you work with in implementing these activities.

Question 1: Does the activity involve any contact with children?

Contact with children means being engaged in an activity or in a position that involves or may involve contact with children, either under the position description or due to the nature of the work environment. This means physical contact, face-to-face contact, oral communication, written communication or electronic communication. Contact also covers contact with children in the community not associated with the work being performed. Examples of where it is determined there will be contact with children include:

- Any international work, in particular working in remote/rural locations
- Oral and written communication (including electronic communication) relating to a child
- Access to data relating to a person under 18
- Public diplomacy, official functions, visits or other communication activity involving photography, filming, videoing or social media activities where children are present
- Visiting premises that provide services to children e.g. schools, health or residential facilities.
- Any community consultation (data collection, surveying, training)
- Women and Gender focussed activities
- Health Sector Programs

Do any of these statements apply to any of your stakeholders? (staff, volunteers, partners, board etc)

	Yes/No
Personnel deployed internationally (outside their usual country of residence)	
Personnel working in a remote and/or rural location	
Involves in infrequent activities alone with children (not frequently enough to be <i>working with children</i>)	
Involves activities that are away from organisation location	
Involves infrequently in meeting one-on-one with children (not frequently enough to be <i>working with children</i>)	
Involves unpredictable or remote settings	
Involve direct one-on-one or group access to children online	
Involves supervising child-to-child online contact	
Has online access to a child's or children's personal and/or confidential information	
Inadequate/missing safe options in the community for children to report unwanted attention or inappropriate behaviour by others	
Involves educating children and supporting adults on cyber safety	

Question 2: Does the activity involve working with children?

Working with children means being engaged in an activity with a child where the contact would reasonably be expected as a normal part of the activity and the contact is not incidental to the activity. Working includes volunteering or other unpaid work. The risks of child exploitation and abuse generally increase with the frequency of contact, meaning that working with children is inherently higher risk than contact with children.

Examples include any activities or services for children provided in the context of, but not limited to:

- Disability service
- Residential care or any form of child accommodation services
- Child protection services or justice facilities for children
- Childcare services, child education services or children in sports
- Health services or access to sexual and reproductive health
- Counselling and support services for children
- Emergency response or humanitarian assistance to children and families
- Any child-focussed activity or program

Do any of these statements apply to any of your stakeholders? (staff, volunteers, partners, board etc)

	Yes/No
Engages with children whose true or cognitive age impacts on their ability to protect themselves	
Engages with children who have challenges that contribute to their vulnerability* (e.g. psychological, situational)	
Engages with children who do not have many support systems	
Involves demonstrating a skill to children	
Position involves need for physical contact/touching children	
Involves providing a personal service (e.g. washing, dressing, toileting)	
Monopoly on provision of goods and/or services	
• Medical	
• Food distribution	
• Career training (sports/musical)	
Involves personnel having unsupervised contact with children	
Activities/engagement with children is not observed or monitored	
Involves developing close, personal, long-term relationships with children	
Involves transporting children	
Involves one or more of the following: One-on-one supervision, overnight supervision, out of town activities, advising or offering guidance to children or spending extended periods of time with children e.g. camps	
Contributes to important decisions regarding the future of children	
Has access to personal/confidential information	
Adult has a perceived or actual level of authority (From child perspective)	
Requires specific skills, knowledge, qualifications or service eligibility requirements to undertake a child related position	
Engages with parents/carers whose true or cognitive age impacts on their ability to protect their children	
Engages with parents/carers who have challenges that contribute to their ability to provide care (e.g. psychological, situational)	
Engages with parents/carers who do not have many support systems	

Note: Vulnerability can include, Physical and mental disabilities, homelessness, child sex workers or parents who are sex workers, children and families impacted by disasters, displaced, migrants, refugees and asylum seekers, children in contact with the law, children that have been subject to trafficking, orphans, unaccompanied minors and the very young.

Question 3: Is the organisation child-focused?

A child-focused organisation is an organisation that answers ‘yes’ to any of the following questions:

	Yes/No
Part of the ACCI Relief Kinnected Program	
The organisation across all of its operations provides direct activities/services for children	
The organisation provides humanitarian relief	
Organisation provides Residential/Orphanage/Shelter services	
Organisation uses a child sponsorship model	
Organisation allows sponsors to visit with children	
Organisation is part of a 'voluntourism' program (Voluntourism is "Volunteer travel, volunteer vacations or voluntourism is travel which includes volunteering for a charitable cause" Voluntourism is a business model that has been shown to be very high risk to children.)	
Organisation uses children and/or images of children as a 'product' for fundraising activities	

PART 2 – Identify Risk Rating for your Organisation

If you answered yes to any of the statements in the Working with Children question or identified as a Child focussed Organisation you are considered by ACCIR to have **high inherent risk**.

- To mitigate that risk a **full Child Safeguarding Risk Assessment** will need to be completed. *Please contact your ACCI project manager if you need a copy of the template. You do not need to complete part 3 of this assessment.*
- Then review all Child Protection Controls in the light of your Child Safeguarding Risk Assessment and make necessary adjustments. *(See ACCI Child Safeguarding Policy for further details)*

Please contact your ACCI project manager if you need any assistance in reviewing or updating your Child Protection Controls

If you have answered yes to any of the questions in the Contact with Children but are not Working with Children or a Child focussed organisation then you are considered by ACCIR to have **medium inherent risk**.

- To mitigate that risk please review your current Child Protection Controls (Part 3)

Please contact your ACCI project manager if you need any assistance reviewing or updating your current Child Protection Controls

If you have answered no to the statements in all 3 questions you are identified as **low inherent risk**.

- Ensure that you have signed and abide by the ACCI Child Safeguarding Policy
- Continue to identify any potential risks to children in your current risk assessment process and practice.

Contact ACCI Project Manager if your program changes increasing your risk rating.

PART 3 – REVIEW Current Child Protection Controls (Medium Risk only)

Consider the current child protection controls that are in place as part of your existing child protection policies and procedures. A **no** response to all or most questions would indicate that controls are not adequate. A **yes** response to all or most questions would indicate systems are more likely to be adequate or strong.

Current Child Protection Controls	Yes/No
Child Safeguarding/Protection Policy that is less than 3 years old	

Child Safeguarding/Protection Policy in place that includes a commitment to preventing a person from working with children if they pose an unacceptable risk to children?	
Risk management practices in place which includes risks to children	
Recruitment and screening practices completed for all staff, before commencing work	
Notifications/Incident reporting procedures in place	
Staff and downstream partners receive child protection training	
Boundaries for appropriate behaviour/code of conduct are implemented	
The organisation's 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	
Record keeping procedures are in place (meetings, activities, incidents, reports, logs, record of complaints, staff performance)	
The organisation ensures their downstream partners (organisations or individuals) comply with the relevant minimum child protection standards	

APPENDIX 5: INTERVIEW AND IMAGE CONSENT FORM



The purpose of this form is to gain consent to interview and capture images of project beneficiaries and participants for use in ACCI publications/promotions. All content must be sourced according to the ACCI Communication Policy. Please Note: This form should be translated for non-English speakers.

PART 1: CONSENT OF SUBJECT

1.	<p>I consent to my story and image being recorded and published in ACCI publications and promotional materials both in print and online. I understand that my story can be downloaded from the internet and may be accessed by anyone.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Only Print</p>
2.	<p>I consent to my story and image being used by ACCI for the next 5 years (or until I revoke my consent).</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No – If no, please state how long you consent for your story and image to be used by ACCI:</p> <p>_____</p> <p><small>(Note: In the case of survivors of abuse or exploitation, content will be used for a maximum of 2 years unless otherwise specified by the interview subject)</small></p>
3.	<p>I consent to ACCI using my name and the personal details I disclose in my interview in ACCI publications and promotional materials.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> Yes, but I would like to OMIT the following details: <input type="checkbox"/> No</p> <ul style="list-style-type: none"> <input type="checkbox"/> Name <input type="checkbox"/> Age <input type="checkbox"/> Specifics of any condition I may have <input type="checkbox"/> Location <input type="checkbox"/> Other (Please specify) _____

I wish to make the following extra requests: _____

PART 2: DETAILS OF SUBJECT

Name of person being interviewed/photographed: _____ Age (if a minor): _____

Location: _____ Project: _____

Signature of subject: _____ Date: _____

PART 3: PARENT/GUARDIAN CONSENT

- If the person is under 14 years old a parent or guardian must give consent.
- If the person is 14-18 years old but, in your opinion, is unable to give informed consent, a parent or guardian must also give consent.

Parent/Guardians name: _____

Signature of Parent/Guardian: _____ Date: _____

MANAGING LEVELS OF RISKS:

When ACCI staff/Field Workers wish to use images or information about an individual, they should assess the risks of harm or stigma to the individual and act according to the table below in all promotions and communications activities.

As children are always more vulnerable to abuse and exploitation, **ACCIR will rank all children as medium to high risk.**

LEVEL OF RISK OF HARM OR STIGMA:	HOW TO ACT ACCORDING TO LEVEL OF RISK
LOW	Faces, first names and geographical location may be revealed.
MEDIUM	Faces, pseudonyms and vague geographical location may be revealed.
HIGH	Faces & visuals to be concealed, pseudonyms to be used and specific locations will not be revealed.

Is the person a survivor of abuse or exploitation:

Yes No

Is there a risk of harm or stigma to the person if this story is published?

No

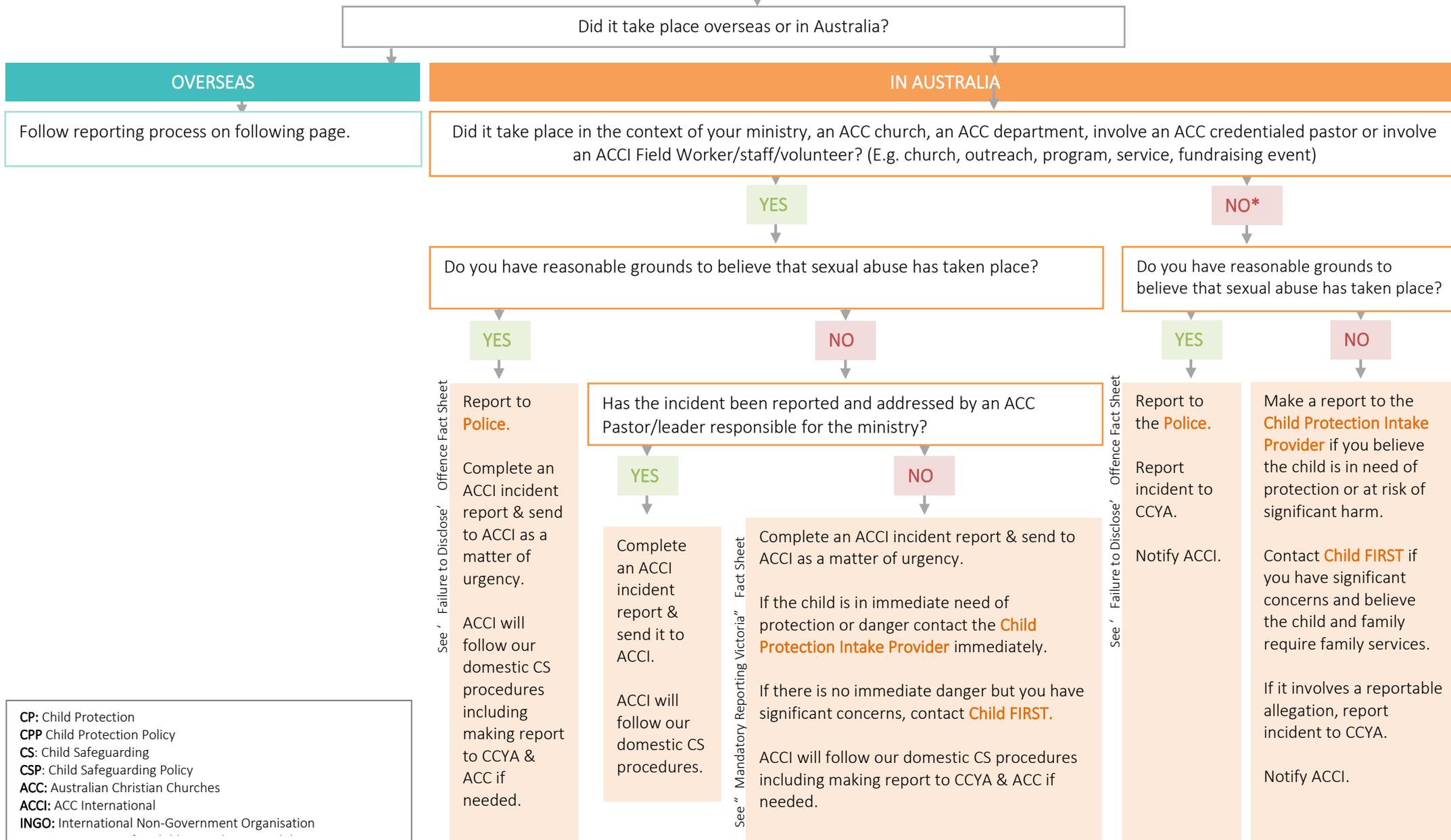
Yes, Medium Risk - If yes, please state below the reason why and any recommendations:

Yes, High Risk - If yes, please state below the reason why and any recommendations:

Signature of Staff/Field Worker/Partner: _____ Date: _____

APPENDIX 6: ACCI CHILD SAFEGUARDING INCIDENT RESPONSE FLOWCHART

You have reasonable grounds for belief or suspicion that a child has been abused, is at risk of significant harm or is being groomed:



CP: Child Protection
CPP: Child Protection Policy
CS: Child Safeguarding
CSP: Child Safeguarding Policy
ACC: Australian Christian Churches
ACCI: ACC International
INGO: International Non-Government Organisation

* If unsure, please contact ACCI for clarification.

You have reasonable grounds for belief or suspicion that a child has been abused, is at risk of significant harm or is being groomed:

Did it take place overseas or in Australia?

OVERSEAS

IN AUSTRALIA

Does it involve an individual ACCI Stakeholder *including ACCI staff, volunteers, field workers, associates, and board members.*

Follow reporting process for Australia as detailed above

YES

NO*

Immediately report to ACCI and complete an ACCI incident report form and send to ACCI.

Report according to your CPP/CSP and national/state legislative framework.

Follow your CP/CS response procedures and/or disciplinary procedures.

ACCI will launch investigation.

Did it take place in the context of any of the following?

- Your ministry or project;
- A beneficiary, regardless of the location of the incident
- A partner ministry or a project funded by ACCI (downstream funding); or
- Does it involve any of your project/ministry staff, volunteers, or representatives?

YES

NO*

Report according to your CPP/CSP and national/state legislative framework.

Follow your CP/CS response procedures and/or disciplinary procedures.

Immediately report to ACCI using your incident report and investigation form.

ACCI will review and support any investigation as required.

Document your concerns and report according to the national/state legislative framework of your country of service.

This could be the police or a **CP INGO or Helpline.**

Notify ACCI.

ACCI will review all notifications and follow up as necessary.

CP: Child Protection
CPP: Child Protection Policy
CS: Child Safeguarding
CSP: Child Safeguarding Policy
ACC: Australian Christian Churches
ACCI: ACC International
INGO: International Non-Government Organisation
CCYA: Commission for Children and Young Adults

Protective concerns

You are concerned about a child because you have:

- received a disclosure from a child about abuse or neglect
- observed indicators of abuse or neglect
- been made aware of possible harm via your involvement in the community external to your professional role.

At all times remember to:

- record your observations
- follow appropriate protocols
- consult notes and records
- consult with appropriate colleagues if necessary
- consult with other support agencies if necessary

STEP 1	RESPONDING TO CONCERNS	STEP 2 FORMING A BELIEF ON REASONABLE GROUNDS	STEP 3 MAKING A REFERRAL TO Child FIRST	STEP 4 MAKE A REPORT TO CHILD PROTECTION
	<p>1. If your concerns relate to a child in need of immediate protection; or you have formed a belief that a child is at significant risk of harm*.</p> <p>Go to Step 4</p> <p>2. If you have significant concerns that a child and their family need a referral to Child FIRST for family services.</p> <p>Go to Step 3</p> <p>3. In all other situations</p> <p>Go to Step 2.</p> <p>* Refer to Appendix 2: Definitions of child abuse and indicators of harm in the Protocol – <i>Protecting the safety and wellbeing of children and young people</i></p>	<p>1. Consider the level of immediate danger to the child.</p> <p>Ask yourself:</p> <p>a) Have I formed a belief that the child has suffered or is at risk of suffering significant harm? YES / NO and</p> <p>b) Am I in doubt about the child's safety and the parent's ability to protect the child? YES / NO</p> <p>2. If you answered yes to a) or b) Go to Step 4</p> <p>3. If you have significant concerns that a child and their family need a referral to Child FIRST for family services. Go to Step 3</p>	<p>Child Wellbeing Referral</p> <p>1. Contact your local Child FIRST provider.</p> <ul style="list-style-type: none"> • See over for contact list for local Child FIRST phone numbers. <p>2. Have notes ready with your observations and child and family details.</p>	<p>Mandatory/Protective Report*</p> <p>1. Contact your local Child Protection Intake provider immediately.</p> <ul style="list-style-type: none"> • See over for contact list for local Child Protection phone numbers. • For After Hours Child Protection Emergency Services, call 131 278. <p>2. Have notes ready with your observations and child and family details.</p> <p>* <i>Non-mandated staff members who believe on reasonable grounds that a child is in need of protection are able to report their concerns to Child Protection</i></p>

For further information refer to *Protecting the safety and wellbeing of children and young people – A joint protocol of the Department of Human Services Child Protection, Department of Education and Early Childhood Development, Licensed Children's Services and Victorian Schools*

CONTACT DETAILS:

Victoria Department of HEALTH AND Human SERVICES - CHILD PROTECTION

Child Protection business hours: 8.45am - 5.00pm (Monday - Friday)
During business hours, ring the number covering the local government area (LGA) where the child lives.

North Division Intake - 1300 664 977

Banyule, Buloke, Darebin, Campaspe, Central Goldfield, Gannawarra, Greater Bendigo, Hume, Loddon, Macedon Ranges, Mildura, Moreland, Mount Alexander, Nillumbik, Swan Hill, Whittlesea, Yarra.

International callers: +61 3 9479 0101

South Division Intake - 1300 655 795

Bass Coast, Baw Baw, Bayside, Cardinia, Casey, East Gippsland, Frankston, Glen Eira, Greater Dandenong, Kingston, Latrobe, Mornington Peninsula, Port Phillip, South Gippsland, Stonnington, Wellington.

International callers: +61 3 8765 5444

East Division Intake - 1300 360 391

Alpine, Benalla, Boroondara, Greater Shepparton, Indigo, Knox, Manningham, Mansfield, Maroondah, Mitchell, Moira, Monash, Murrindindi, Strathbogie, Towong, Wangaratta, Whitehorse, Wodonga, Yarra Ranges.

International callers: +61 3 9843 6000

West Division Intake - Rural and regional only - 1800 075 599

Ararat, Ballarat, Colac-Otway, Corangamite, Glenelg, Golden Plains, Greater Geelong, Hepburn, Hindmarsh, Horsham, Moorabool, Moyne, Northern Grampians, Pyrenees, Queenscliffe, Southern Grampians, Surf Coast, Warrnambool West Wimmera, Yarriambiack.

West Division Intake - metropolitan only - 1300 664 977

Brimbank, Hobsons Bay, Maribyrnong, Melbourne, Melton, Moonee Valley, Wyndham.

International callers: +61 35226 4540

After hours Child Protection Emergency Service - 13 12 78

(5.00pm - 9.00am Monday - Friday, 24 hours on weekends and public holidays)

A state-wide after hours emergency service that receives new reports, as well as concerns for existing child protection clients who are considered to be at immediate risk and require urgent after hours service.

Interstate CHILD PROTECTION contact numbers

Australian Capital Territory (ACT) - 1300 556 729

New South Wales (NSW) - 13 21 11

Northern Territory (NT) - 1800 700 250

Queensland (QLD) - (07) 3235 9999

South Australia (SA) - 13 14 78

Tasmania (TAS) - 1300 737 639

Western Australia (WA) - (08) 9325 1111

Victoria CHILD FIRST

Visit - <https://services.dhhs.vic.gov.au/referral-and-support-teams>