

<h2>AVI Child Safeguarding Policy</h2>	Effective date	October 2023
	Next review date	October 2025
	Sponsor	Executive Manager Corporate Operations
	Board committee	People and Culture
<b>Level / Class</b>  <b>Corporate</b>	Approval/authorisation	Board

## 1. AVI’s COMMITMENT TO CHILDREN

AVI has a vision for a peaceful, just, and sustainable world. Central to this is a commitment to safeguarding the safety, wellbeing, and rights of all children.<sup>1</sup>

AVI’s child safeguarding approach involves everyone at AVI working together and sharing the responsibility to prevent and respond to the risk of child abuse and exploitation. It builds on the existing strengths, systems and skills of our partners and the communities in which we operate.

AVI maintains a safe and open organisational culture that encourages continual learning and improvement, risk analysis and review to ensure child safeguarding is effectively implemented across all areas of AVI governance, programming, and operations.

## 2. PURPOSE

The AVI Child Safeguarding Policy provides a whole-of-organisation safeguarding framework to implement child safe measures across AVI to keep children safe.

## 3. SCOPE / PERSONS AFFECTED

This policy applies to:

- AVI personnel (AVI employees, office volunteers, interns, associates and AVI Board and committee members).
- All AVI program participants
- AVI partners
- External service providers engaged by AVI. This includes consultants, contractors and subcontractors.

## 4. POLICY PRINCIPLES

AVI’s commitment to child safeguarding is informed by the following principles:

- **Child safe organisational culture:** AVI will not tolerate child exploitation and abuse in any way by anyone who works for or is associated with AVI. AVI will not knowingly engage anyone who poses a risk to children and will take seriously any allegations of personnel misconduct raised.

<sup>1</sup> 1 Children are defined as all people under the age of 18 years.

- **Children’s Rights:** Child abuse and exploitation is a severe violation of children’s rights. The United Nations Convention on the Rights of the Child (UNCRC) underpins AVI’s approach to decisions about safeguarding and protecting children. AVI will promote children’s rights to life, survival, and development; participation and non-discrimination and children have a right to participate in decisions that affect them.
- **Inclusion:** AVI upholds the right of the child to be included, irrespective of the child’s or their parent’s or legal guardian’s race, colour, sex, language, religion, political or other opinion, national, ethnic, or social origin, disability, birth, or other status. This includes the right to not be discriminated against for one’s sexual orientation or gender preference.
- **The Best Interests of the Child are Paramount:** AVI takes a child-centred approach ensuring the best interests of the child will be the primary consideration in all decisions involving children.
- **Shared Responsibility:** AVI will ensure a safe reporting environment for anyone to raise concerns for the safety or wellbeing of a child or personnel misconduct. All those covered by this policy have an obligation to contribute to and support this culture of safety.
- **Taking a Risk Management Approach:** AVI accepts that all children are vulnerable to child exploitation and abuse and is committed to identifying and minimising risk in all its programs and activities.

The principles in this policy are also guided by those contained in the Department of Foreign Affairs and Trade’s (DFAT) Child Protection Policy and ACFID’s Code of Conduct, the National Principles for Child Safe Organisations, Victorian Child Safe Standards and the Australian Charities and Not-for-profits (ACNC) External Conduct Standards.

## 5. POLICY DEFINITIONS

- **Child abuse** – involves the abuse of children’s rights and includes all forms of violence against them.
- **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, and poisoning.
- **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 their physical and emotional development and wellbeing.
- **Emotional abuse** — a parent or caregiver’s inappropriate verbal or symbolic acts toward a child, or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child’s self-esteem or social competence.
- **Sexual abuse** — the use of a child for sexual gratification by an adult or significantly older child or adolescent. Sexually abusive behaviours can include fondling genitals; masturbation; oral sex; vaginal or anal penetration by a penis, finger, or any other object; fondling breasts; voyeurism; exhibitionism; and exposing the child to, or involving the child in, pornography.
- **Child Labour** – work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development. It refers to work that is mentally, physically, socially, or morally dangerous and harmful to children and often interferes with their education and recreation. In its most extreme forms, child labour includes slavery, trafficking, sexual exploitation, and hazardous work that put children at risk of death, injury, or disease.
- **Ill-treatment** — disciplining or correcting a child in an unreasonable and seriously inappropriate or improper manner; making excessive and/or degrading demands of a child; hostile use of force towards a child; and/or a pattern of hostile or unreasonable and seriously inappropriate degrading comments or behaviour towards a child.
- **Grooming** — predatory conduct undertaken to prepare a child for sexual activity at a later time. Grooming behaviour is where an adult communicates, by words or conduct, with a child or with a person who has care, supervision, or authority for the child with the intention of facilitating the child’s involvement in sexual conduct, either with the groomer or another adult.

- **On-line grooming** — sending electronic messages to children, with the intention of procuring children to engage in or submit to sexual activity with another person, including but not necessarily the sender; or of sending an electronic message with indecent content to a recipient who the sender believes is a child.
- **Child Exploitation** — includes forcing or coercing another person to commit an act or acts of abuse against a child, possessing, controlling, producing, obtaining, or transmitting child exploitation material, forcing, or coercing another person to commit an act or acts of grooming or online grooming, or using a child for profit, labour, sexual gratification, or other personal or financial advantage. Child exploitation also includes modern slavery and the trafficking or recruitment of children into armed conflict.
- **Contact with children** – working on 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.
- **Working with children** – working with children means 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 works.

## 6. POLICY IMPLEMENTATION

### 6.1 CHILD SAFE RECRUITMENT AND SCREENING

AVI will apply robust child safe recruitment and screening procedures to prevent a person from working with or being in contact with children if they pose an unacceptable risk to children. This includes:

- A statement that confirms AVI's commitment to child safeguarding in advertisements and job descriptions.
- Providing applicants with AVI's Child Safeguarding Policy and Child Safeguarding Code of Conduct during the recruitment and onboarding process.

The following also apply to all AVI personnel (AVI employees, office volunteers, interns, associates and AVI Board and committee members) and program participants:

- National Criminal record checks
  - Criminal record checks must be obtained prior to commencing in their role, for all AVI personnel and program participants (excluding Approved Accompanying Dependents (AAD)), irrespective of position or length of engagement.
  - There may be exceptional circumstances where personnel or program participants are required to commence before a criminal record check is completed, such as rapid recruitment or deployment, time delays in processing in country. If this occurs during recruitment of employees, the People and Culture Manager will approve the use of a statutory declaration until the police check is obtained. In the case of program participants, the Deputy Program Director approves the use of a statutory declaration, and may request the Australian Volunteers Program's Child Protection/Safeguarding Advisor to conduct a child safeguarding risk assessment to determine the level of risk.
- Sign and comply with this policy and the AVI Child Safeguarding Code of Conduct as a condition of commencing with AVI. A written record of policy agreement will be retained on file.

The following apply to all AVI employees and program participants:

- Verbal Referee Checks: At least two verbal referee checks will be conducted and documented. Referee checks will include questions pertaining to an applicant's suitability to either work with or be in contact with children.
- Behavioral based interview questions: questions pertaining to the applicant's interactions with children will be utilized in employment interviews to determine attitudes, motivations, and values, in regard to children and AVI's commitment to child rights.
- All employment contracts contain provisions for potential disciplinary action: including termination of employment following breach of the Child Safeguarding Policy and Code of Conduct. As a condition of partnership, AVI will expect similar conditions from its partners.
- The Volunteer Code of Conduct and assignment confirmation letter contains provisions for potential disciplinary action: including termination of assignment following breach of the Child Safeguarding Policy and Code of Conduct.

As a condition of partnership, AVI will expect similar conditions from its partners.

The following apply to all AVI employees only:

- Working with Children Checks (WWCC) - WWCC applies to all AVI personnel roles (AVI employees, office volunteers, interns, associates and AVI Board and committee members) that involve direct work with children, including roles that have access to child-sensitive data, or any contact with children by letter, email, phone, or social media. The responsibility lies with the person to provide evidence of having obtained a WWCC prior to their engagement with AVI, including adding AVI as an organisation and to maintain a valid WWCC throughout the period of their engagement. AVI personnel must notify AVI when their WWCC is renewed, has lapsed, or been revoked. AVI has the right to suspend personnel or transfer to other duties, until the person obtains a valid WWCC.

Actions following disclosure:

- AVI will not employ or mobilise personnel or program participants if their criminal record check includes convictions or sentences for: sexual offences against a child or adult; violent offences against a child or an adult; any child exploitation or abuse offence; stalking of a child; serious drug offences; family and domestic violence offences. The nature of other adverse findings will be reviewed on a need to know and case-by-case basis by the Safeguarding Advisor or the Child Protection/Safeguarding Advisor, AVI Leadership, People and Culture, Volunteer Services Manager and/or the appropriate line manager/coordinator/other program staff as directed.
- AVI will take all fair and reasonable steps as part of any investigation following an adverse finding, including whether the nature of the finding is in conflict with or affects the role – or other persons also covered by the scope of this policy from being able to carry out their duties and responsibilities. AVI will abide by relevant Australian laws and legislation and the AVI Enterprise Agreement, in regard to ensuring any investigations following disclosure are undertaken in line with privacy, confidentiality, principles of natural justice and anti-discriminatory legislation

## 6.2 EXTERNAL SERVICE PROVIDERS AND VISITORS TO AVI

The following apply to all external service providers engaged by AVI who have contact with children (either direct or indirect such as access to child sensitive data):

- criminal record check before engagement
- verbal referee check

Additional screening such as a Working with Children Check and behavioural-based interview questions will be used when external service providers will be working with children.

AVI expects visitors to AVI offices will be accompanied and supervised by AVI employees at all times.

### **6.3 EDUCATION, TRAINING AND COMMUNICATION**

AVI personnel and program participants will undertake child safeguarding training as part of induction. Training will include understanding of expected behaviours under the AVI Child Safeguarding Code of Conduct and how to report allegations about child abuse and exploitation.

AVI's Child Safeguarding Policy and Child Safeguarding Code of Conduct will be available on the AVI and Australian Volunteers Program websites. The AVI Child Safeguarding Policy and Code of Conduct will be translated into local languages/dialects to ensure accessibility and will also be provided to all Australian and overseas partners.

All program participants will complete a pre-deployment briefing.

Alongside their parents (as program participants), Approved Accompanying Dependents will be included in volunteer on-boarding and in-country support processes, including access to child friendly learning content and access to child centred incident reporting processes.

Education and training on child safeguarding will be provided through dedicated sessions during in-country orientation. Training will contextualise child safeguarding and provide practical country specific information.

### **6.4 CHILD SAFEGUARDING IN AVI PARTNERSHIPS**

As part of a shared responsibility, AVI will collaborate with overseas and Australian partner organisations to strengthen child safeguarding practice.

ROU's/Agreements with all partners will include clauses which state a partner's commitment to safeguarding children (including commitment to incident reporting) and compliance with AVI's Child Safeguarding Code of Conduct.

For partners involved in the delivery of AVI managed or funded programs who have contact with children, including overseas partner organisations where program participants are placed (mobilised or remotely), AVI will conduct due diligence to assess the partner's child safe standards. AVI expects these partners to comply with the following child safeguarding standards:

- operate in accordance with AVI's Child Safeguarding Policy or the partner's own organisational child safeguarding/protection policy where it applies similar standards and where relevant, complies with DFAT's Child Protection Policy minimum standards
- apply child safe recruitment and screening procedures for all personnel in contact with or working with children
- provide child safeguarding training to personnel
- have clear reporting mechanisms or processes for all personnel, program participants, external service providers and visitors to report concerns of child abuse or exploitation
- have child safeguarding policy and reporting information available and accessible to community members, that is appropriate to the local context.

AVI will support partners to meet the required child safeguarding standards when carrying out their work. This

includes assistance to develop and review partner's child protection/safeguarding policies and procedures and coordinate training for personnel.

## **6.5 AVI SAFEGUARDING FOCAL POINTS**

AVI will appoint Safeguarding Focal Points for the Australian Volunteers Program in each Country Office to support implementation of this Policy and to promote shared learning to strengthen child safe practices across AVI.

## **6.6 USE OF IMAGES AND MESSAGES**

AVI bases all image gathering and publishing processes on ethical standards, which includes an assessment of risks to children, respect for children's rights, privacy, integrity, and dignity. This includes obtaining and documenting informed consent from a child's parent/guardian and children themselves (age/development stage appropriate). Children's best interests and protection will be prioritised over opportunities for promotion and advocacy.

AVI will promote awareness of child safeguarding approaches to image gathering and publishing processes during program participant pre-departure learning/briefings, staff inductions and during child safeguarding training briefings.

## **6.7 CHILD SAFEGUARDING RISK ASSESSMENTS**

AVI personnel will undertake child safeguarding risk assessments for all programs and activities that may have contact with children. This assessment will identify risks (including the level of contact with children and the nature of contact), classify high risk activities, and document steps being taken to reduce or remove these risks. Child safeguarding risk assessments should be undertaken at the program design stage with evidence of adaptation to local context and be reviewed and updated regularly during the life of the program.

AVI Leadership is responsible for managing any child safeguarding incidents and risks. The Safeguarding Advisor or Child Protection/Safeguarding Advisor will coordinate response and provide expert advice and support to the Leadership Team in responding to incidents.

## **7. INCIDENT/RISK REPORTING AND RESPONSE**

AVI provides a safe environment for anyone to make a report concerning the safety or wellbeing of a child.

AVI personnel, program participants, partners and external service providers must immediately report any concerns, observations, suspicions, or behaviour that is suspected of being child abuse or exploitation, or a suspected breach of AVI's Child Safeguarding Policy and Child Safeguarding Code of Conduct. Children and members of the community may also report.

No action will be taken against any person who informs AVI in good faith of incidents and risks. However, those who willfully inform AVI using false information will be subject to investigation and possible consequences as per disciplinary procedures. AVI is committed to ensuring privacy, and psychological and physical safety for individuals who report.

AVI will ensure the provision of accessible community based and child friendly feedback and reporting mechanisms, in line with the commitment to a child-centred approach. Children who have experienced harm,

abuse or exploitation have a right to privacy, to be treated with dignity and respect, not be subject to discrimination, have information provided to them and their family and participate in decision making about the course of action, appropriate to their age and development stage.

## What to report:

- An observation or disclosure (by an adult or child) of abuse or exploitation
- An observation or disclosure of potential risk of harm or child abuse
- A breach of the AVI Child Safeguarding Policy or Child Safeguarding Code of Conduct
- A situation or environment which is working in opposition to, or poses a threat to children's rights
- An observation or disclosure of behaviour which could be considered grooming
- Child exploitation materials that are received on AVI electronic equipment (this can include, but is not limited to, SPAM, popups, text messages, emails, or social media communications).

## A report must be made when:

- Suspected harm is due to the actions or inactions of an AVI board member, staff member or program participant, or other associate, or due to the actions of a person representing an AVI partner or contractor.
- An alleged criminal offence has been committed against a child and the matter will be reported to the relevant authorities both in the country where the crime was committed and to Australian authorities.
- Suspected harm is committed by an AVI partner where AVI program participants are placed.

**When to report:** The report must be made immediately, or within 24 hours, of becoming aware of the incident, suspicion, or risk.

## Who to report to:

Reports must be made to one or more of the following:

- [childprotection@avi.org.au](mailto:childprotection@avi.org.au)
- Line Manager
- People and Culture
- Safeguarding Advisor
- Child Protection/Safeguarding Advisor
- [Stopline](#)

**For DFAT funded projects,** AVI must immediately report any suspected or alleged case of child exploitation, abuse, or policy non-compliance to DFAT [childwelfare@dfat.gov.au](mailto:childwelfare@dfat.gov.au). The Child Protection/Safeguarding Advisor or Safeguarding Advisor will prepare the report and it will be reviewed by the Operations Support Manager. A copy of the report will be sent to the CEO.

Country Office Staff and/or relevant managers are the first point of call for child safeguarding issues in-country. They, along with the Child Protection/Safeguarding Advisor or Safeguarding Advisor continue to monitor and respond to child safeguarding issues and identify ongoing training and support needs.

## What happens after a report:

- All incident reports will be documented, investigated, and responded to.
- All reports are given a Level 4 rating in the Risk Matrix tool 'Risk Wizard'.
- An incident response case plan will be developed and will include:
  - (a) An assessment of the incident report information,
  - (b) An outline of the specific actions to be taken, a time frame, and those persons responsible for taking the action required.

- Actions required may include reporting to local and/or National authorities in accordance with National Law/s, and AVI's commitment and duty of care. AVI will be guided by national or international laws, but its operations may go beyond these (i.e., AVI will not necessarily be limited in its response to an incident to complying with relevant laws).
- Action to be taken by the Regional Director or relevant managers:
  - Following a formal investigation, a confirmed breach of the Child Safeguarding Policy or Code of Conduct may lead to the instigation of performance and disciplinary procedures, which may involve termination of employment for staff, or termination of an assignment for program participants.
- The Safeguarding Advisor or Child Protection/Safeguarding Advisor will coordinate response and provide expert advice and support to the Leadership Team in responding to incidents.

### **How to respond to children if they disclose:**

The following strategies will help support children if they disclose that they have been harmed or abused:

- Try to keep calm and give the child your attention
- Listen to the child, do not ask leading questions
- Let the child take his or her time to tell what happened
- Reassure the child that it is the right thing to tell
- Let the child use his or her own words to tell
- Don't make promises you can't keep
- Let the child know what you will do next
- If the child is injured seek medical attention
- Do not examine the children unless you are a parent/legal guardian or a medical practitioner
- Don't confront an alleged offender (this can endanger the person who reports or the child themselves).

### **Confidentiality and Safety:**

AVI will ensure that all incidents and reports are handled according to the principles of confidentiality, safety, impartiality, procedural fairness, timeliness, and accuracy. All incidents and reports and the names of people involved will be handled in the strictest of confidence. Details will only be disclosed on a 'need to know' basis, where required by relevant local or Australian law, or when a report to police or appropriate authorities is made.

## **POLICY REVIEW**

This policy will be reviewed and, where appropriate, updated, at least once every two years.

## **9. RELATED POLICIES AND DOCUMENTS**

- [AVI Code of Conduct](#)
- [AVI Country Office Staff Policy](#)
- [AVI Enterprise Agreement](#)
- [AVI Ethical Content Guidelines](#)
- [AVI Incident Reporting Policy](#)
- [AVI Modern Slavery Act Statement](#)
- [AVI Position on Residential Care for Children](#)
- [AVI Prevention of Sexual Exploitation, Abuse and Harassment Policy](#)
- [AVI Privacy Policy](#)
- [AVI Probity Check Policy](#)
- [AVI Work Health and Safety Policy](#)
- Australian Volunteers Program Operations Manual (Child Protection) and AVI International Services

## 10. REFERENCES

- [ACFID Code of Conduct](#)
- [ChildSafe Organisations – National Principles](#)
- [DFAT Child Protection Policy](#)
- [DFAT Prevention of Sexual Exploitation and Abuse Policy](#)
- [United Nations Convention on the Rights of the Child \(UNCRC\)](#)
- [United Nations Convention on the Rights of Persons with Disabilities.](#)
- [United Nations Resolution: Guidelines for the Alternative Care of Children](#)

## REVISION HISTORY

Date	Revision Number	Change(s)	Reference Section(s)
Feb 2007	1.0	AusAID compliance – policy rollout March 2008	
Nov 2008	1.3	Combining AVI draft with AusAID CP Policy March 2008; Incorporating AVI CPWG & Childwise	
Jan 2009	1.5	CFID Child Rights Working Group & AVI TL additions	Associates Children with disabilities Guardian / parent
Jun 2009	1.6	Overall edit	
Jun 2010	2.0	Removal of procedural elements and risk management clause. Procedures edited slightly also	Section 6 & 7 edited. Original section 8
Oct 2013	3.0	Overall edit	
Oct 2015	3.1	Minor edits Addition of social media elements to 'Expected Behaviours document'	2, 4, 5, 6 combine 5 and 6
Jan 2016	3.2	Final edit	
Mar 2016	3.3	Further formatting edits	
Aug 2016	3.4	Brand update – no content changes	
Feb 2018	3.5	Full review and update for compliance with DFAT CP Policy	All Sections
Dec 2020	4.0	Full review and edit in line with ACFID and DFAT compliance and updated global risk indicators	All sections
Sep 2023	5.0	Change name to Child Safeguarding Policy. Full review.	All sections.