

## **Revised Child Protection Policy**

### **1.1 Purpose**

- a. The Leprosy Mission Trust India commits to comply with all the standards of child protection policy designed to safeguard children from discrimination, exploitation, neglect, sexual and physical abuse.
- b. The Leprosy Mission Trust India is committed to reduce the risk to children in all its programmes implemented through hospitals, Vocational Education Institutes, community based activities and partner institutions. The Child Protection Policy is to safeguard children from all the possible abuses and exploitations by staff, donors and others with whom they are in contact. The child protection policy of TLMTI also intends to raise awareness on child protection in the families and communities.
- c. The overall goal of this policy is to protect children from every form of abuse in all the programmes undertaken by The Leprosy Mission Trust India.
- d. The Leprosy Mission Trust India serves leprosy affected and other marginalized in the community through hospitals, community based projects and Vocational Education Institutes. Our programmes include children who are leprosy affected and marginalized. TLM Trust India, through the Child Protection Policy will protect children from all possible risks in our programmes and create an environment for the overall development of the children.

### **1.2 Our values, principles and beliefs on child protection**

- a. We believe that child abuse involves the abuse of children's rights.
- b. We value equal rights to protection from abuse and exploitation of Children.
- c. We will work to promote the rights of children as set out in the UN Convention on the Rights of the Child. This includes the right to freedom from abuse and exploitation.
- d. Child abuse is never acceptable.
- e. We have a commitment to protecting children with/ for whom we work.
- f. When we work through partners, we will ensure that they have a responsibility to meet minimum standards of protection for children in their programmes.

### **1.3 Guiding principles for the child protection policy**

The Convention on the Rights of the Child (CRC) was adopted by the UN's General Assembly in 1989 and entered into force in 1990. This Convention applies to human beings below the age of eighteen. The Child Protection Policy of The Leprosy Mission Trust India is based on the provisions in the United Nations Convention on the Rights of the Child (UN CRC). Its provisions include:

- a. Parties shall respect and ensure the rights set forth in the present Convention to each child within their jurisdiction without discrimination of any kind, irrespective of the child's or his or her parent's or legal

guardian's race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status (Article 2.1)

- b. Parties shall take all appropriate measures to ensure that the child is protected against all forms of discrimination or punishment on the basis of the status, activities, expressed opinions, or beliefs of the child's parents, legal guardians, or family members (Article 2.2)
- c. In all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities or legislative bodies, the best interests of the child shall be a primary consideration (Article 3.1)
- d. Parties shall ensure that the institutions, services and facilities responsible for the care or protection of children shall conform with the standards established by competent authorities, particularly in the areas of safety, health, in the number and suitability of their staff, as well as competent supervision (Article 3.3)
- e. The right of the child to freedom of expression (Articles 12 and 13)
- f. The right of the child to freedom of thought, conscience and religion, and to freedom of association and peaceful assembly (Articles 14 and 15)
- g. The right of the child to health care and to education (Articles 24 and 28)
- h. No child shall be subjected to arbitrary or unlawful interference with his or her privacy, family, or correspondence, nor to unlawful attacks on his or her honor and reputation. The child has the right to the protection of the law against such interference or attacks (Article 16).

The Government of India acceded to the UN Convention on the Rights of the child in 1992, and is committed to its full implementation for the benefit of children. There are other laws pertaining to children in India such as the Juvenile Justice and Care and Protection Act 2000, The Child Labour (Prohibition and Regulation Act), 1986 and the Immoral (Prevention) Traffic Act, 1956 (amended Act of 44 of 1986) provide guidelines for safety and security of children.

#### 1.4 **Scope**

The policy applies to:

- a. TLM Trust India staff
- b. All contractors and NGO Partners funded by TLM Trust India, including:
  - i. Volunteer service providers
  - ii. Individually contracted advisers/consultants to TLM Trust India
  - iii. Partners, subcontractors or associates subcontracted by contractors or NGOs
  - iv. The personnel (paid and unpaid, including all volunteers) of contractors and NGOs funded by TLM Trust India

## 1.5 **Key stakeholders**

- a. Children
- b. Parents
- c. Staff of the institution
- d. Management
- e. Community

## 1.6 **TLM Trust India endeavors to safeguard children by**

- a. Adopting child protection procedures and a code of practice for all who work on behalf of the organization.
- b. Reporting concerns to the authorities.
- c. Following carefully, procedures for recruitment and selection of staff, interns and volunteers etc.
- d. Providing effective management for staff, interns and volunteers through support and training.
- e. Advocating for the child rights and prevention of child abuse.

## 1.7 **Definitions**

### a. **Who is a child?**

According to the UN Convention on the Rights of the Child (Article 1) a child is every human being below the age of 18 years.

### b. **What is child protection?**

Child protection is a broad term to describe philosophies, policies, standards, guidelines and procedures to protect children from both intentional and un-intentional harm. In the current context, it applies particularly to the duty of organisations and individuals associated with the organisations towards children in their care.

UNICEF uses the term 'child protection' to refer to preventing and responding to violence, exploitation and abuse against children – including commercial sexual exploitation, trafficking, child labour and harmful traditional practices, such as female genital mutilation/cutting and child marriage.

### c. **What is child maltreatment or child abuse?**

Child maltreatment, sometimes referred to as child abuse and neglect, includes all forms of physical and emotional ill-treatment, sexual abuse, neglect, and exploitation that results in actual or potential harm to the child's health, development or dignity. Within this broad definition, five subtypes can be distinguished – physical abuse; sexual abuse; neglect and negligent treatment; emotional abuse; and exploitation (WHO, 1999)

d. **Physical abuse:** Physical abuse of a child is that which results in actual or potential physical harm from an interaction or lack of interaction, which is reasonably within the control of a parent or person in a position of responsibility, power or trust. There may be single or repeated incidents (WHO, 1999).

e. **Signs of physical abuse:**

- i. Unexplained burns, cuts, bruises or welts in the shape of an object
- ii. Bite marks
- iii. Anti social behavior
- iv. Problems in school
- v. Fear of adults Drug or alcohol abuse
- vi. Self destructive or suicidal behavior
- vii. Depression or poor self image.

f. **Sexual abuse:** Child sexual abuse is the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared and cannot give consent or, that violates the laws or special taboos of society. Child sexual abuse is evidenced by an activity between a child and adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person. This may include but is not limited to the inducement or coercion of a child to engage in any unlawful sexual activity; the exploitative use of a child in prostitution or other unlawful sexual practices; the exploitative use of children in pornographic performances and materials (WHO, 1999).

g. **Signs of sexual abuse:**

- i. Seductiveness
- ii. Avoidance of things related to sexuality or rejection of own genitals or bodies
- iii. Nightmares and bedwetting
- iv. Drastic changes in appetite
- v. Over compliance or excessive aggression
- vi. Fear of a particular person
- vii. Withdrawal, secretiveness or depression
- viii. Suicidal behavior
- ix. Eating disorders
- x. Self-injury

h. **Emotional abuse:** Emotional abuse includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure, so that the child can develop a stable and full range of emotional and social competencies commensurate with her or his personal potential, and in the context of the society in which the child dwells. There may also be acts towards the child that cause or have a high probability of causing harm to the child's health or physical, mental, spiritual, moral or social development. These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust or power. Acts include restriction of movement, patterns of belittling, denigrating, scape-goating, threatening, scaring, discriminating, ridiculing, or other non physical forms of hostile or rejecting treatment. (WHO, 1999).

i. **Signs of emotional abuse:**

- i. Apathy
- ii. Depression
- iii. Hostility
- iv. Lack of concentration
- v. Eating disorders

j. **Neglect:** It is the failure to provide a child in all spheres: physical and mental health, education, nutrition, shelter and safe living conditions, in the context of resources reasonably available to the family or the caretakers. The neglect causes or has a high probability of causing harm to the child's health, physical, mental, moral or social development. This includes the failure to properly supervise and protect the child from any physical harm and to provide the emotional security of being cared for.

## 1.8 **Procedures and guidelines for implementation**

a. **Child safe recruitment and screening processes:** Child safe recruitment and screening processes will be adopted into the Human Resources policies of TLM Trust India.

- i. TLM Trust India will ensure that prior to the recruitment, the candidate will be enquired about past work assignments.
- ii. Documented verbal referee checks will be done for all the personnel including the volunteers who will be working with the children.
- iii. All staff and volunteers are required to sign the TLMTI Child Protection Code of Conduct (attachment 2) and Criminal offense declaration form (attachment 7)

- b. Training and awareness raising:** TLM Trust India will make sure that proper awareness is raised among different stakeholders.
- i. TLM Trust India will promote regular awareness, on child abuse, child participation and protection of children to its staff and patients, volunteers, partner community based organizations (CBO), partner institutions, interns and board members.
  - ii. The staffs who come in contact with children during work will receive child protection training as a part of their initial orientation and will be made aware of the procedures relating to taking action against child abuse. Regular child protection training will be conducted for all these staff members, and a training register maintained to demonstrate best practice.
- c. Programme planning:** TLM Trust India will make sure that it includes activities related to Child Protection in all the projects in India.
- i. A rights based approach will be adopted in all the projects and children will be involved in programme planning, implementation, monitoring and evaluation.
  - ii. Plan programmes that will reduce risks faced by children in the society.
  - iii. Design programmes that will cater to the various needs of the children, especially leprosy affected.
  - iv. A project-specific Risk Assessment (attachment 12) will be completed by all TLMTI personnel leading projects as part of the Annual Project Review process and updated annually to reflect on child-specific risks that may have changed or developed since initially completed. This content will be included into the project Risk Matrix and corresponding section in the project annual narrative reports.
- d. Behavior protocols and code of conduct:** All personnel including staff, volunteers, interns and consultants will establish an atmosphere conducive for the development of children through their word, deed and demeanor. This includes listening to the problems and concerns of the children and showing respect to them.
- i. Treat children with respect regardless of race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
  - ii. Medical examination of Children in TLM Trust India and TLM Trust India supported partner hospitals should be in the presence of parents/guardian of the child.
  - iii. Ensure proper security and availability of wardens in the hostels of Vocational Education Institutes, run by TLM Trust India.

- iv. Not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- v. Not engage children in any form of sexual activity or acts, including paying for sexual services or acts.
- vi. Wherever possible, ensure that another adult is present when working in the proximity of children.
- vii. Not invite unaccompanied children into their homes, unless they are at immediate risk of injury or in physical danger.
- viii. Not sleep close to unsupervised children unless absolutely necessary.
- ix. Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any medium.
- x. Refrain from physical punishment or discipline of children (excluding their own children).
- xi. Refrain from hiring children for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.
- xii. Comply with all relevant local legislation, including labour laws in relation to child labour.
- xiii. Immediately report concerns or allegations of child abuse in accordance with appropriate procedures.

**e. Visit to TLM projects:** Visit by any donor or well wisher to TLM projects in India should adhere to the Child Protection Policy.

- i. Visits by donors or guests to the projects should be informed well in advance and prior written permission to be taken stating the purpose of the visit.
- ii. Consent from the family of the child is to be obtained prior to visiting the child.
- iii. The visitor will adhere to the cultural context in terms of dress code and behaviour protocols.
- iv. A TLM Trust India staff will accompany the visitor at all times when visiting the child, family or community.

**f. Communication protocols:** TLM Trust India will make sure that the communication standards are met in all the correspondences.

- i. TLM Trust India will ensure that all communication materials on children in the form of pictures/captions are decent, dignified and respectful and will not present children as victims, nor will glamorize poverty at the cost of the child.
- ii. TLM Trust India will ensure that written permission will be obtained from parents/guardian before using photographs of children with whom we work.

- iii. In case of case studies, the name of the child will be changed before publishing it in any media.
  - iv. Any personal or physical information that could be used to identify the location of the child in the project will not be used in any correspondence or in the website.
  - v. Photographs or videos of children from TLM Trust India projects will not be handed over to anybody without written agreement that it will be properly used.
- g. Advocacy and networking:** TLM Trust India will advocate for child protection and child rights. By networking with various like minded agencies, it will be possible to influence policies and laws.
- i. Organize campaigns to advocate for the rights of the children and influence the policies at the government level.
  - ii. Networking with NGOs, FBOs and GOs to promote child rights and to share knowledge on child protection.
  - iii. Undertake research activities that will bring out issues relating to child rights.
- h. Incident reporting and management:** TLM Trust India believes in zero tolerance with incidents of child abuse in any of its programmes across the country.
- i. Any incident of child abuse in TLM Trust India programmes, directly implemented or implemented in partnership with other stakeholders will be reported directly to the Executive Director or Head of Human Resources.
  - ii. The issue will be dealt sensitively by protecting the confidentiality and image of the child.
  - iii. Appropriate and most stringent action will be taken against those found guilty of violating the protection of the rights of the child after ascertaining the facts of the incident.
  - iv. Counseling, medical/legal support and care will be provided for the child and the family.
- i. General confidentiality of child information:** We will make sure that no information regarding children in our programmes will be disclosed to anybody unnecessarily.
- i. The files and photographs of children will be kept confidentially, in a secure place.
  - ii. Information about Child Protection incidents will be shared with people on a “right” and ‘need to know” basis.
- j. Agreements with partner institutions:** TLM Trust India will ensure that the partner institutions adhere to the child protection policies of TLM Trust India.
- i. All agreements with partner Institutions will include a clause referring to Child Protection and the Partner is expected to comply with Child Protection Protocols.



- ii. We expect the partner institutions to have child protection policies of their own or to abide by the policies of TLM Trust India.

**1.9 TLM Trust India will make sure**

- a. All The Leprosy Mission Trust India staff will sign up to and abide by the code of conduct.
- b. All partners will sign and abide by the code of conduct.
- c. All staff and volunteers will have access to a copy of the child protection policy.
- d. Recruitment procedures will include checks on suitability for working with young people.
- e. Induction will include briefing on child protection issues.
- f. Every workplace will display contact details for reporting possible child abuse and every member of staff will have contact details for reporting.
- g. Systems will be established in the national office to investigate possible abuse once reported and to deal with it.
- h. Project-specific Risk Assessment will be completed on an annual basis for best practice in our projects, with identified risks integrated into project-specific risk registers.

**1.10 Review of the policy**

TLMTI will continue to monitor its organizational culture and promote a working environment that promotes protection of children. TLMTI will regularly review the implementation and relevance of this policy and revise as per the needs of the organisation.

Last approved by TLMTI Board – March 2018.

**1.11 Attachments**

- 1. DFAT Minimum Child Protection Standards – TLMTI Evidence of Implementation
- 2. Child protection code of conduct
- 3. Internal Procedure for handling reports of misconduct
- 4. Checklist for employee suspension
- 5. Checklist to help partners to achieve child protection policy expectations
- 6. Interview questions relating to child protection
- 7. Criminal offense disclosure form
- 8. Mandatory reporting process for TLMTI staff and partner organizations
- 9. Report of a reasonable suspicion of child abuse and neglect
- 10. Guidelines for child protection training
- 11. DFAT guideline notes on establishing child protection risk context
- 12. Child Protection Risk Assessment template

13. Signed code of Conduct register template

**Attachment 1: DFAT Minimum Child Protection Standards – TLMTI Evidence of Implementation**

Requirement	Minimum standard	Minimum standard – evidence	TLMTI Evidence	Why is this required?	What is the risk without it?
<p><b>Having a Child Protection Policy and reporting procedure in place</b></p>	<p><b>1.</b></p> <p>The organisation has a child protection policy that applies to all personnel, partner’s downstream personnel and subcontractors that are engaged by the organisation to perform any part of a DFAT funded activity.</p> <p>The managing partner must ensure the downstream organisation or individual subcontractor complies with the minimum child protection standards.</p>	<ul style="list-style-type: none"> <li>- Child protection policy in place</li> <li>- Personnel aware of the organisation’s child protection policy (e.g. through internal communication and training)</li> <li>- Documented plan for ensuring downstream DFAT funded partners are meeting the minimum standards</li> <li>- Initial risk assessment of organisation and activities to inform policy development</li> </ul>	<ul style="list-style-type: none"> <li>- Revised TLMTI CPP policy 2018</li> <li>- CPP refresher training to be conducted annually and a register kept - <i>Attachment 5</i> in CPP 2018 (however TLMTI does not work with in-country partnerships)</li> <li>- Initial Risk Assessment of TLMTI projects completed 2018. Project specific risk assessments to be completed across TLMTI program and risk registers maintained annually</li> </ul>	<p>A child protection policy provides clear guidance and demonstrates how the organisation, across its operations, will ensure that children are protected from child exploitation and abuse in the delivery of DFAT administered/ funded programs.</p>	<p>An organisation is unaware of the risks to children within their organisation and the activities they manage and/or implement.</p> <p>Having a sub-contractor sign up to a code of conduct as the only control does not provide sufficient contractual effect to address child protection issues.</p>
	<p><b>2.</b></p> <p>The organisation’s child protection policy includes a documented reporting procedure for child exploitation and abuse allegations, code of conduct and policy non-compliance, including available sanctions for breaches.</p>	<ul style="list-style-type: none"> <li>- Organisation’s guidelines for managing concerns or allegations of child exploitation and abuse, and policy non-compliance</li> <li>- Documentary evidence that personnel can raise concerns about a child’s safety or well-being or unacceptable behaviour by personnel</li> <li>- Documentary evidence outlining the organisation’s details of available sanctions</li> <li>- Documentary evidence of externally facing policy and reporting</li> </ul>	<ul style="list-style-type: none"> <li>- <i>Attachment 3</i> – Internal procedures for handling reports of misconduct Revised CPP 2018</li> <li>- TLMTI Training register and training materials on the CPP to be maintained &amp; project-specific risk assessments completed by TLMTI personnel</li> <li>- <i>Attachment 4</i> – Checklist for employee suspension CPP 2018</li> <li>- Revised CPP 2018 uploaded to TLMTI website</li> </ul>	<p>An effective child protection policy requires a report handling procedure.</p> <p>One of the biggest hurdles to personnel reporting child exploitation and abuse is that there is no formal system in place to do so, or that personnel or community members are not aware of a formal system to report concerns or allegations.</p> <p>Reporting systems must respect the</p>	<p>Personnel are unaware how to report concerning behaviour.</p> <p>Community members are unaware how to report concerning behaviour.</p>

		information		rights of both the alleged victim and the alleged offender.	
	<p><b>3.</b></p> <p>The organisation provides child protection training for personnel.</p>	<ul style="list-style-type: none"> <li>- Training attendance records</li> <li>- Training agendas and timeframes for training</li> <li>- Materials used in training</li> </ul>	- TLMTI Training register and materials on the CPP to be maintained	Personnel must be fully aware of their responsibilities to protect children and how to report concerns or allegations about child exploitation and abuse.	<p>Personnel are unaware of behaviour that would arouse concern.</p> <p>Personnel are unaware of how to build child protection practices into their work. Personnel do not know how to report concerning behaviour.</p>
	<p><b>4.</b></p> <p>The organisation's child protection policy includes a commitment to preventing a person from working with children if they pose an unacceptable risk to children.</p>	<ul style="list-style-type: none"> <li>- Referenced in relevant documentation, including policies, contracts and human resource guidelines</li> </ul>	- Revised TLMTI CPP policy 2018	The organisation, as an employer, must have clear grounds to determine whether a person is the most appropriate to work with children.	A lack of leadership and governance and the right culture undermine personnel efforts to implement a child protection environment.
	<p><b>5.</b></p> <p>The organisation's child protection policy is subject to regular review, at least every five years or earlier if needed.</p>	<ul style="list-style-type: none"> <li>- Policy is subject to regular review in accordance to the policy commitment, or at least every five years</li> </ul>	- Revised TLMTI CPP policy 2018	Contexts change, particularly in the development sector. There must be a commitment to review and update the policy as required.	Lessons learned from previous incidents are not taken into account, increasing the likelihood that those risks will be repeated.
<b>Undertaking risk assessment</b>	<p><b>6.</b></p> <p>The organisation undertakes a risk assessment to reduce the risk of any child being harmed as a result of operations or activities funded by DFAT. The assessment must identify risks, and document steps being</p>	<ul style="list-style-type: none"> <li>- Risk plan identifying activities and measures to reduce or remove the risk to children</li> <li>- Documentation that risk assessments are reviewed and updated regularly during the life of the activity</li> <li>- Evidence of adaption</li> </ul>	Project-specific risk assessments completed by TLMTI personnel as part of Annual Project Review process and included into project Risk Matrix / Annual Reports	Some activities are higher risk than others. This may be due to the nature of the activity or the location. For example, working with children with disability or in an emergency situation involve higher	Risks to children are missed during activity design and implementation

	taken to reduce or remove these risks.	to local context (when a different approach to standard risk controls is required)		risks.	
<b>Recruitment and screening, and employment practices in place</b>	<p><b>7.</b></p> <p>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</p>	<ul style="list-style-type: none"> <li>- Employment contracts for personnel/consultants contain appropriate provisions</li> </ul>	<p>-Attachment 4 – Checklist for employee suspension CPP 2018</p> <p>-TLMTI Employee contracts to include provisions for suspensions or transfer to other duties for employees under investigation and provisions to dismiss after an investigation</p>	Robust recruitment, screening and employment practices reinforce the importance of the organisation's child protection policy to personnel.	Personnel that pose unacceptable risks to children are unable to be removed (suspended, transferred or terminated) without a criminal conviction, where contracts are in place.
	<p><b>8.</b></p> <p><b>Contact with children positions</b></p> <p>The organisation has robust recruitment screening processes for all personnel in contact with children. These recruitment procedures include:</p> <ul style="list-style-type: none"> <li>- criminal record checks before engagement</li> <li>- verbal referee checks</li> </ul> <p><b>Working with children positions</b></p> <p>Additional screening measures (such as interview plans that incorporate behavioural-based interview questions) must be used when candidates are applying for positions that involve working with children.</p>	<ul style="list-style-type: none"> <li>- Documented criminal record checks for personnel in contact with children</li> <li>- Documented verbal referee checks</li> <li>- Documented request for an applicant to disclose whether they have been charged with child exploitation offences, and their response</li> <li>- Interview plans incorporating behavioural-based interview questions that are specific to positions that involve working with children</li> <li>- Review checks when personnel have a change in circumstances</li> <li>- In limited circumstances it may prove impossible to obtain a reliable criminal record check. A statutory declaration, or local legal equivalent, outlining efforts made to obtain a</li> </ul>	<p>-Documented verbal referee checks completed as part of TLMTI recruitment process</p> <p>- Attachment 2 - Revised TLMTI CPP Code of Conduct and Attachment 7 Criminal Record Self Disclosure declaration to be signed by TLMTI staff, volunteers and all new staff.</p> <p>-Attachment 6 – interview questions relating to child protection utilised by TLMTI in interviews</p> <p>- Revised TLMTI CPP Code of Conduct/ Criminal Self Disclosure form 2018 to be re-signed by staff who undertake a change of roles within TLMTI</p> <p>- Retrospective Criminal record checks to be completed for</p>	<p>Child-safe recruitment and screening processes are essential to enable an organisation to choose the most appropriate person for a position that involves contact with children.</p> <p>Recruitment and selection can strengthen external inhibitors by preventing access to children by those with a known history of harming children.</p> <p>Child safe recruitment and selection processes can discourage individuals who pose an unacceptable risk to children from applying for positions.</p>	<p>Adults with a background of unacceptable risks to children target organisations that will provide opportunities to be in contact with children.</p> <p>A person who poses an unacceptable risk of harm to children (as indicated by their background) is unknowingly appointed to a position within the organisation.</p>

		<p>foreign police check, and disclosing any charges and spent convictions related to child exploitation, may be accepted instead</p> <ul style="list-style-type: none"> <li>- Checks must be conducted for each country in which the individual has lived for 12 months or longer over the last 5 years, and for the individual's countries of citizenship</li> </ul>	<p>TLMTI staff where possible, including for when TLMTI staff have lived for 12 months or longer overseas and for the individuals countries of citizenship</p>		
	<p><b>9.</b></p> <p>The organisation has a child protection code of conduct that meets the minimum standard set by DFAT (see Attachment B – DFAT’s Child Protection – Professional Behaviours).</p>	<ul style="list-style-type: none"> <li>- A risk based child protection code of conduct based on DFAT’s Child Protection – Professional Behaviours</li> <li>- Signed codes of conduct or a register documenting details of personnel who have signed the code of conduct, or inclusion in employment contracts</li> <li>- Signed image consent forms/ verbal consent file notes</li> </ul>	<p>- Attachment 2 - Revised TLMTI CPP Code of Conduct to be signed by TLMTI staff, volunteers and all new staff.</p> <p>-Attachment 14 – Code of Conduct register maintained by TLMTI</p> <p>Signed image consent forms collected and maintained for all TLMTI case studies.</p>	<p>A code of conduct makes clear the organisation’s standards for acceptable and unacceptable behaviour in relation to children, including use of images and must be signed by all personnel. It protects personnel by providing guidance on how to avoid situations that may be perceived as harmful to children. It also provides employers with a sound basis on which to conduct disciplinary action.</p>	<p>Lack of clear, well-advertised rules allows behaviour to go unchallenged. Identification of a child and/or their whereabouts.</p>

## Attachment 2: Child Protection Code of Conduct

I, \_\_\_\_\_ [insert name], acknowledge that I have read and understand TLMTI’s Child Protection Policy and agree that in the course of my association with TLMTI, I commit to:

- a. treat children with respect regardless of race, colour, gender, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status

- b. not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate
- c. not engage children under the age of 18 in any form of sexual intercourse or sexual activity, including paying for sexual services or acts
- d. wherever possible, ensure that another adult is present when working in the proximity of children
- e. not invite unaccompanied children into private residences, unless they are at immediate risk of injury or in physical danger
- f. not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible (noting that this does not apply to my own children)
- g. use any computers, mobile phones, video cameras, cameras or social media appropriately, and never to exploit or harass children or access child exploitation material through any medium
- h. not use physical punishment on children
- i. not hire children for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury
- j. comply with all relevant Australian and local legislation, including labour laws in relation to child labour
- k. immediately report concerns or allegations of child exploitation and abuse and policy non-compliance in accordance with appropriate procedures
- l. immediately disclose all charges, convictions and other outcomes of an offence that relates to child exploitation and abuse, including those under traditional law, which occurred before or occurs during association with DFAT
- m. not develop any 'special' relationships with children that could be seen as favouritism (for example, the offering of gifts or special treatment for specific children)
- n. be aware of behaviour and avoid actions or behaviours that could be perceived by others as child exploitation and abuse

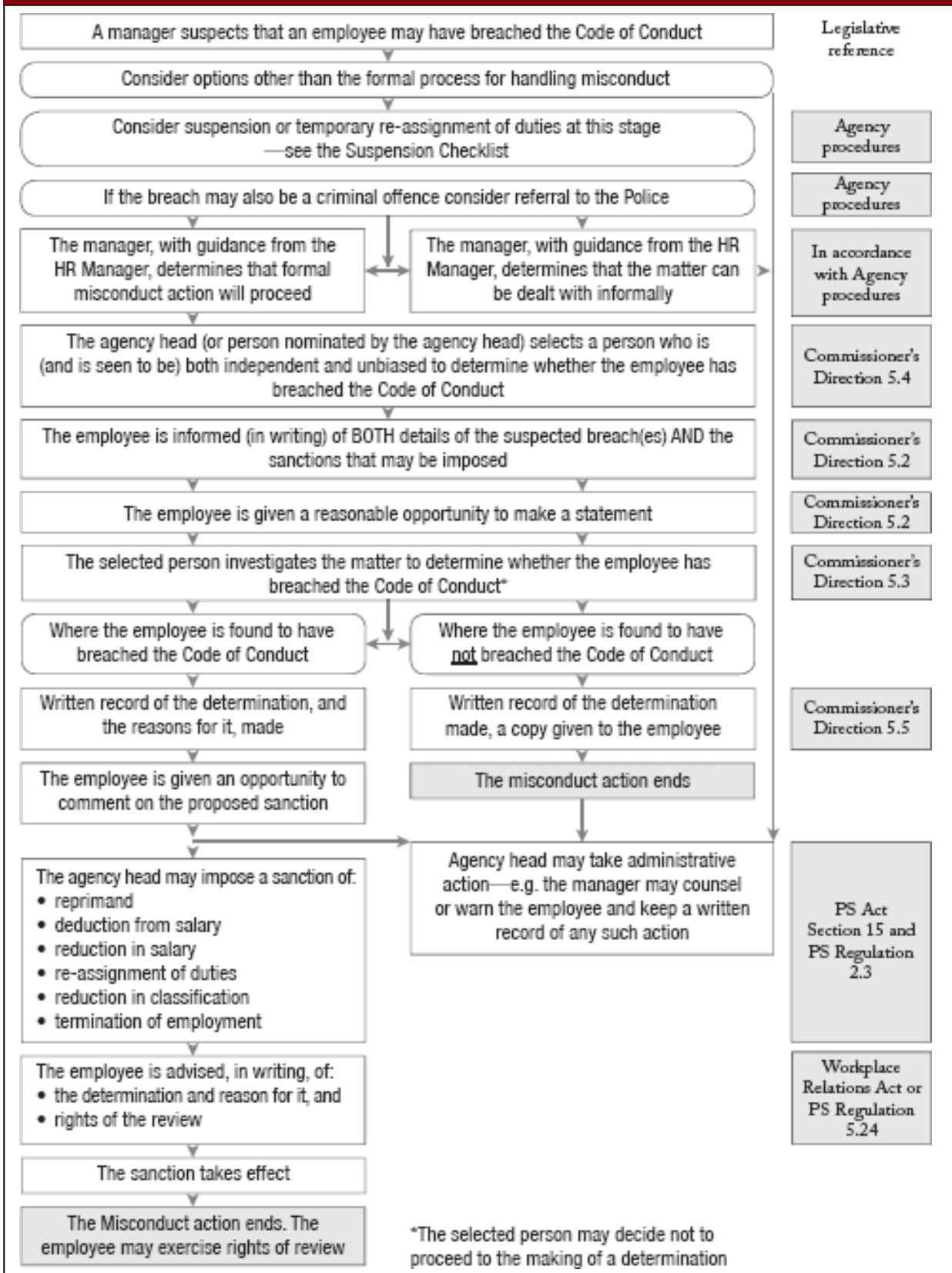
**When photographing or filming a child or using children's images for work-related purposes, I commit to:**

- a. take care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child
- b. obtain informed consent from the child and parent or guardian of the child before photographing or filming a child. As part of this I must explain how the photograph or film will be used
- c. ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive
- d. ensure images are honest representations of the context and the facts
- e. ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.

I understand that the onus is on me, as a person associated with TLMTI, to use common sense and avoid actions or behaviours that could be construed as child exploitation and abuse.

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

## Attachment 3: Internal Procedures for Handling Reports of Misconduct



## **Attachment 4: Checklist for Employee Suspension**

### **Deciding whether or not to suspend**

- Is it in the public interest, or the TLMTI's interest, to remove the employee from the workplace?
- Has re-assignment of duties been considered as an option?
- Is it clear that the decision maker is not prejudging and is seen as not prejudging whether the employee has breached the Code?

### **When imposing suspension**

- Will the suspension be with pay or without pay?
- Has there been an opportunity for the employee to make a statement before the suspension is implemented?
- Has the employee been advised of the possible length of the suspension and of his/her ongoing status (e.g. attendance at training courses previously booked, entitlement to apply for vacancies, access to the work premises)?

### **Where suspension is without pay**

- Has the employee been advised about possible access to leave credits?
- Has the employee been advised about the length of the period of suspension and the fact that he/she could seek outside employment?

### **During suspension**

- Is the suspension being reviewed at reasonable intervals?
- Are there exceptional circumstances warranting the extending of unpaid suspension beyond 30 days?

### **Where it is determined that the employee suspended without pay has not breached the Code of Conduct**

- Is salary forgone during suspension to be reinstated or is there a case for not doing so?
- Is it appropriate to re-credit any paid recreation leave or long service leave applied for during suspension?
- Is it appropriate to take outside earnings into account before reinstating forgone salary?

### **Terminating the suspension**

- Has a sanction been imposed on the employee for the relevant breach? OR
- Does the agency head no longer believe that the employee has or may have breached the code? OR
- Does the agency head no longer believe that the suspension is in the public interest or in the agency's interest?

### **At the conclusion of the period of suspension**

- Is it necessary to decide whether the period of suspension counts as service?
- Has the appropriate documentation been completed?

## **Attachment 5: Checklist to help Partners to Achieve CPP Expectations**



1. MOU in place between TLMTI and Partner Organisation (including Core Partners, Civil Society Organizations, Individual Contractors, and Volunteers).
2. TLMTI Child Protection Policy compliance standards explained to Partner Organisation, ensuring they understand and act on their obligations for managing risks to children.
3. Partner Organisation develops and implements its own TLMTI-compliant Child Protection Policy in accordance with the Compliance Guide (Attachment 1), which consists of nine standards that provide a framework for managing and reducing the risks of child exploitation and abuse.
4. Partner Organisation develops and implements its own TLMTI-compliant Code of Conduct (Attachment 2), which is signed by all staff and (international) volunteers, and re-signed with every new contract.
5. Partner Organisation staff and (international) volunteers must obtain a criminal record check (or accepted equivalent) before they are employed, and with every new contract.
6. The Partner Organisation's Child Protection Policy, Criminal Record Check, and Code of Conduct must apply to all personnel, (international) volunteers, Civil Society Organisations, and subcontractors who are engaged by the Partner Organisation to perform any activity that receives TLMTI funding. Partner Organisations must ensure that any program participants and other partners comply with child protection standards.
7. TLMTI or designated trainers within the country conduct Child Protection training for all staff of Partner Organisation.
8. Partner Organisations are informed how to immediately notify TLMTI's Management Team if any of their personnel are accused of, charged with, arrested for, or convicted of criminal offences relating to child exploitation and abuse.

## **Attachment 6: Interview Questions Relating to Child Protection**

The following questions are a necessary part of our child protection process. Please answer them as honestly as you can. The answers you provide will be kept confidential where possible, but may be provided to other senior staff within this organization if necessary.

- a. This organization has a Child Protection Policy. What is your understanding about having such a policy?

*Note: Briefly explain the reason and content policy, if the applicant does not have a good understanding.*

- b. Why do you think it is important to abide by such a policy?

*Note: Expect an answer that is about the protection and safety of children.*

- c. What type of behavior towards children would be culturally acceptable for you or your colleagues, when you find that children are present, as you perform your work activities?

*Note: Expect an answer that mentions: respect for children as people, limited and/or culturally acceptable physical contact, always being in the presence of others, etc).*

- d. Please describe any good experiences you have had interacting with children or young people in the past?

*Note: Was the good experience described culturally acceptable or usual?*

- e. What type of behavior towards children would NOT be culturally acceptable for you or your colleagues, when you find that children are present as you perform your work activities?

*Note: Expect an answer that mentions: disrespect for children as people, culturally unacceptable physical contact, deliberately organizing to be alone with the child, etc).*

- f. Please describe any bad experiences you have had interacting with children or young people in the past?

*Note: Was the bad experience described culturally acceptable or usual?*

- g. Please describe a situation where you have disciplined a child or young person recently?

*Note: Was the discipline done in a culturally acceptable way?*

- h. Have you ever been accused of, charged with, arrested for, or convicted of criminal offences relating to child exploitation and abuse? If yes, please explain the situation, what happened and why you were arrested or convicted?

- i. Have you ever been investigated for violent or sexually related offences? If yes, please explain the circumstances?

- j. If you suspect or see that another staff member is behaving inappropriately towards children, what would you do?

*Note: Expect an answer that mentions: Report the behavior or incident to a senior staff member, keep the situation confidential but expect some type of investigation, follow-up with a more senior staff member if you see no action has been taken after a few weeks.*

- k. Is there any other information relating to your suitability for this position that we should be aware of?

## **Attachment 7: Criminal Offense Self Disclosure Form**

Name \_\_\_\_\_ Date of Birth \_\_\_\_\_

UIDAI number \_\_\_\_\_ Place of issue \_\_\_\_\_ Expiry Date \_\_\_\_\_

**Disclosure of Criminal Offense Record**

List all arrests, convictions, and serious motor vehicle offenses (other than minor traffic violations) incurred as an adult, regardless of how long ago. *If you have no offenses to report, please indicate by putting N/A on first line.*

**Important**

- a. This form is required of all applicants to TLMTI. Disclosure must be made if requested by TLMTI post-interview. Any change that occurs if employed, must be disclosed as soon as possible to the HRD.
- b. Disclose all history of legal accusation, charges, arrests, or convicted of criminal offences relating to serious motor vehicle or traffic offenses, substance abuse offences, violence or sexually related offences, child exploitation and abuse, felonies and misdemeanors.
- c. Criminal offenses are evaluated by TLMTI on an individual basis, with consideration given to the nature and circumstances of the offense. The existence of a criminal offense record is not necessarily cause for disqualification of an application or dismissal from the organisation.
- d. If you fail to list any part of your criminal offense history, including omission and intentional falsification, your application to TLMTI may be disqualified and you may lose your opportunity for

<b>Date of Criminal Offense</b> Estimate date if not known	<b>Criminal Offense</b>	<b>Location (City, State)</b> <b>Arresting Agency</b>
1.		
2.		
3.		

employment.

**Signature and Release**

I certify that this information on my criminal offense disclosure form and criminal record (attached) is correct and complete.

I understand that providing false or incomplete information, or withholding information by omission or intention, may be cause for disqualification of employment application to TLMTI and loss of opportunity for employment.

I understand that TLMTI may contact referees, supervisors, and other individuals to clarify information supplied in the my application.

I understand that in unusual circumstances, TLMTI may see it necessary to share the findings of the background check with TLMTI senior management.

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



## Attachment 9: Report of a Reasonable Suspicion of Child Abuse and Neglect

### Details of child subject to report

Full name of the child \_\_\_\_\_

Address \_\_\_\_\_

\_\_\_\_\_ Date of Birth \_\_\_\_\_ Age \_\_\_\_\_

Languages spoken \_\_\_\_\_ Interpreter required Yes / No

Does the child have a disability? Yes / No Disability Type \_\_\_\_\_

Does the child attend school? Yes / No School name? \_\_\_\_\_

### Persons living in the same household as the child

Name	Date of Birth / Age	Relationship to Child
1.		
2.		
3.		

### Type of Abuse being Reported

Suspected:  Physical Abuse  Emotional Abuse  Sexual Abuse  Neglect

At risk of:  Physical Abuse  Emotional Abuse  Sexual Abuse  Neglect

### Detail of Report

*In responding to the following questions, please provide information that has led to your reasonable suspicion of harm or risk of harm.*

#### Are you aware of any harm to the child?

Yes (detail below) / No

(eg. signs / symptoms / indicators of child abuse and / or neglect; physical appearance of any injury; recency of injury; severity; frequency; any ongoing concerns; delay in presentation; explanation of harm; emotional / behavioural impacts of harm; any disclosures made by child)

#### Are you aware of any risk of harm to the child?

Yes (detail below) / No

(eg. vulnerability; history of harm; emotional / behavioural presentation; presence of medical needs or developmental delays; relationships with parents and significant others)

#### Can you provide details of the parents' / carer's circumstances?

Yes (detail below) / No

(eg. their parenting capacity; their protective capacity; the presence of complicating factors such as domestic violence; drug / alcohol misuse; mental health history; physical or intellectual abilities; relationship stability)

**Are you aware of any relevant environmental factors?**

**Yes** (detail below) / **No**

(eg. condition of the child's home; socio-economic factors that impact on the family; family and individual stressors; mobility and frequency of travel)

**Are you aware of any protective factors and / or family / child strengths?**

**Yes** (detail below) / **No**

(eg. the presence in the home of a protective care giver; a child's ability to seek external help when they feel they are at risk)

**Are you aware of any relevant previous health expectations?**

**Yes** (detail below) / **No**

(eg. identify any previous presentations that may hold child protection concerns / reports in relation to the child)

**Source of Information**

(eg. clinical presentation / assessment / observation / contact / advice)

**Has the parent / carer been advised that this report has been made?**

**Yes** (detail below) / **No**

Comment: \_\_\_\_\_

*Note: If you make a decision to inform the parent / carer / child that a report has been made, any reasonable expectation of confidentiality is lost.*

**Details of the person(s) allegedly responsible for the harm or risk of harm**

Name \_\_\_\_\_ Relationship to Child \_\_\_\_\_

Address \_\_\_\_\_

Employed by (if relevant) \_\_\_\_\_ Position \_\_\_\_\_

**Description of Harm or Risk of Harm**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Details of Reporting Professional**

Name \_\_\_\_\_ Telephone \_\_\_\_\_

Position \_\_\_\_\_ Employer \_\_\_\_\_

Signature \_\_\_\_\_ Date of Report \_\_\_\_\_

## **Attachment 10: Guidelines for Child Protection Training**

Training for TLMTI staff and partners in Child Protection practices will cover the following topics:

- Introduction to the UN Convention on the Rights of the Child
- Specific local legislation around the care of children (adjusted according to the state or country where the training is delivered)
- Roles and responsibilities of staff, partners, contractors, volunteers
- What is physical abuse, sexual abuse, emotional abuse, neglect and exploitation
- Why they happen
- What is the impact on children
- Indicators of abuse
- When to report abuse
- Reporting process
- Caring for children who have been abused
- Avoiding allegations – protective behaviours
- Ensuring children know their rights

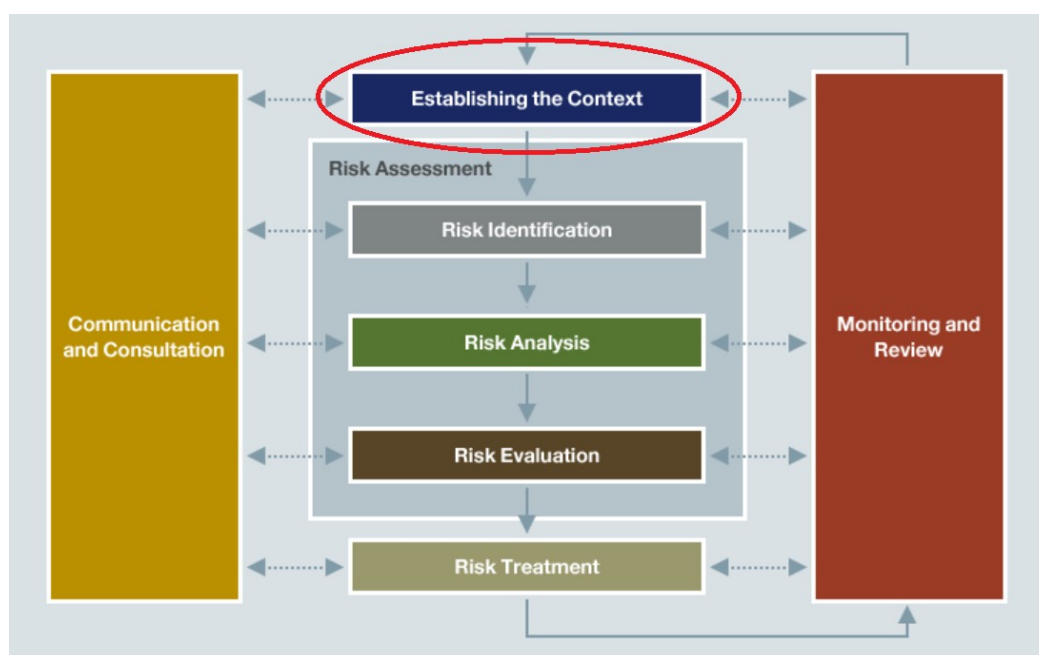
## Attachment 11: DFAT Guidance notes on Establishing Child Protection Risk Context

### Guidance Note Establishing Child Protection Risk Context DFAT Child Protection Policy

September 2016

This guide will assist DFAT staff and partners undertaking activities funded by DFAT (implementing partners) in establishing the **child protection risk context** to help determine whether a full child protection risk assessment is required. This guidance supports the DFAT Child Protection Policy 2013 (CPP) and is consistent with the DFAT approach to risk management.

Establishing the context of risk is the first step in the risk management process and is circled in the diagram below.<sup>1</sup> Following the steps outlined in this guide will determine whether a full child protection risk assessment needs to be undertaken.



Child protection risks need to be assessed as part of standard risk management processes at design, implementation, monitoring and evaluation – and managed throughout the lifecycle of an activity.

There are common **child protection risk context** areas that DFAT staff and implementing partners can review to determine whether a more detailed child protection risk assessment must be undertaken. These include the likely risk level of the partner organisation and the nature of contact between staff and children that will take place under the activity.

There are three steps outlined in this guide that are used to establish the **child protection risk context**. Once you have completed the three steps you can establish the overall potential **child protection risk context** and determine whether a full child protection risk assessment is required.

Risk levels included in this document are modelled on the DFAT Risk Matrix and follow the principles of the [International Standard on Risk Management \(AS/NZ 31000:2009\)](#).

#### **'High' Risk Activities**

<sup>1</sup> The Risk Management Process - International Standard on Risk Management (ISO 31000:2009)



Activities can be 'high' risk for a number of reasons. This can be due their nature, the organisation involved or a combination of both. Even though DFAT may be engaging in a low risk activity with an organisation, if that organisation is deemed a 'high' risk, then a risk assessment must be conducted before engagement and risk monitoring conducted throughout the engagement.

Establishing Child Protection Risk Context	
Step 1	Does the activity involve working with children or contact with children? This step will guide you through identifying the level of involvement with children. <i>If the activity is determined to be 'working with children' then a full child protection risk assessment is required</i>
Step 2	Is the organisation child-focused and what child protection controls <sup>2</sup> are currently in place?
Step 3	Determine the Child Protection Risk Context
<i>Note: All steps <u>must</u> be undertaken. It is not enough to identify an activity as low risk.</i>	

### Step 1: Does the activity involve working with children or contact with children?

There are two parts to this step:

Part A - Determine the activity level of working with or contact with children

Part B - Activity Inherent Risk

Use the definitions at the end of the document to assist with answering Part A and B

#### Step 1

#### Part A - What is the level of working with or contact with children at the activity level?

Complete the worksheet by adding a Yes/No response.

1. Contact with Children - Assessment (No = nil contact)		
Inherent risk	Personnel will be deployed in-country?	
	Personnel will be working in a remote and/or rural location?	
Degree of Isolation	Involves being alone with children? (not frequently enough to be working with children)	
	Involves activities that are away from organisation location	
	Involves meeting one-on-one with children? (not frequently enough to be working with children)	
	Involves unpredictable or remote settings?	
Online contact or access to personal details	Involves direct one-on-one or group access to children online?	
	Involves supervising child-to-child online contact?	
	Involves online access to a child's or children's personal and/or confidential information?	
	Inadequate/missing safe options for children to report unwanted attention or inappropriate behaviour by others?	
	Involves educating children and supporting adults on cyber safety?	

<sup>2</sup> Child protection controls for example can be, organisations undertaking child safe recruitment practices or ensuring their staff sign a child protection code of conduct. Controls are applied to limit the likelihood of a risk taking place.

<b>2. Working with Children - Assessment</b>		
<b>Vulnerability of child/ children</b>	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?	
<b>Degree of physical contact</b>	Involves demonstrating a skill to children?	
	Position involves need for physical contact/touching children?	
	Involves providing a personal service? (e.g. washing, dressing, toileting)	
<b>Degree of monopoly</b>	Monopoly on provision of goods and/or services <ul style="list-style-type: none"> <li>• Medical?</li> <li>• Food distribution?</li> <li>• Career training (sports/musical)?</li> </ul>	
<b>Degree of supervision</b>	Involves personnel having unsupervised contact with children?	
	Activities/engagement with children is not observed or monitored?	
	Insufficient number of trained staff to supervise activities/engagement with children?	
<b>Degree of trust</b>	Involves developing close, personal, long term relationships with children?	
	Involves transporting youth?	
	Involves one or more of the following: One-on-one supervision, overnight supervision, out of town activities, advising or offering guidance to youth or spending extended periods of time with youth e.g. camps?	
	Contributes to important decisions regarding the future of children?	
<b>Access to Property</b>	Has access to personal/confidential information?	
	Adult has a perceived or actual level of authority? (from child perspective)	
<b>Skills and knowledge required</b>	Requires specific skills, knowledge, qualifications or service eligibility requirements to undertake a child related position?	
<b>Child labour</b>	Possibility that activity will lead to the employment of children?	
	Possibility that activity will lead to the removal of children from school?	
	Possibility that activity will lead to children being employed in hazardous work?	
<b>Vulnerability of parent/carer</b>	Engages with parents whose true or cognitive age impacts on their ability to protect their children?	
	Engages with parents who have challenges that contribute to their ability to provide care? (e.g. psychological, situational)	
	Engages with parents who do not have many support systems?	
<b>Vulnerability can include:</b>	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?	

Step 1 Part B – Activity Inherent Risk			
Based on your responses in Part 1, identify the inherent risk of the activity using the table below. Activity Risk is the level of potential risks to children due to the nature of the activity (working with children) or the design of the activity (design of the activity introduces risks to children).			
LOW	No contact	<input type="checkbox"/>	The activity does not involve any individuals working in-country (Nil Contact) (you answered No to all questions in Step 1 Part A)
MODERATE	Contact with Children	<input type="checkbox"/>	The activity involves or may involve contact with children (working in-country, remote or rural area) (you answered Yes to <u>any</u> questions in 'Contact with Children - Assessment' but 'No' for all questions in 'Working with Children - Assessment')
HIGH	Working with Children	<input type="checkbox"/>	The activity involves working with children (you answered YES to <u>any</u> questions under 'Working with Children - Assessment')

**Note:** If an activity is determined to be 'working with children' then a full child protection risk assessment is required regardless of the organisational context outcome.

**Step 2: Is the organisation child-focused and what child protection controls are in place?**  
 There are two parts to this step:  
 Part A – Assessment of Organisation's Focus on Children and strength of child protection systems in place  
 Part B – Organisation Inherent Risk

**Step 2  
Part A – Assessment of Organisation's Focus on Children and strength of systems**

Complete the worksheet below and add a Yes/No response against each question under 'Systems and Controls' and 'Focus'.

Organisation Profile		
<b>Size of organisation</b>	Number of staff employed by the organisation either paid or unpaid	
<b>Types of Personnel</b>	Contractors	
	Permanent staff	
	Volunteers	
	Sponsors	
	Other	
<b>Sites</b>	Number of sites operated	
	Proximity of sites to central management	
	Sites are located in unpredictable or remote / rural location	
<b>Systems and Controls</b> - Strength of systems and controls scaled by number of 'yes' responses. Use the scale 0 Yes answers = poor systems, 8 Yes answers = strong systems		
<b>Child protection policy and procedures</b> <sup>3</sup>	Child Protection Policy in place?	
	Recruitment practices, screening completed for all staff, before commencing work?	
	Notifications/Incident reporting procedures in place?	
	Staff receive child protection training?	
	Boundaries for appropriate behaviour/code of conduct are implemented?	
	Feedback on staff performance recorded?	

<sup>3</sup> A no response to all or most questions would indicate a high-risk organisation due to poor systems. A yes response to all or most questions would indicate strong systems

	Record keeping procedures are in place (meetings, activities, incidents, reports, logs, record of complaints)?	
	Organisation checks if third party service providers are child safe?	

<b>Focus - A child-focused organisation is an organisation that answers 'yes' to any of the questions below.</b>		
<b>Types of activities</b>	Does the organisation across all of its operations provide any direct activities/services for children?	
	Does the organisation provide any humanitarian relief?	
<b>Business model/services provided by organisation<sup>4</sup></b>	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' <sup>5</sup> program?	
	Organisation requires technical experience/expertise to implement child related services?	
	Organisation uses children and/or images of children as a 'product' for fundraising activities?	

<b>Step 2</b>			
<b>Part B - Organisation Inherent Risk</b>			
Organisational risk is the level of potential risk posed by the organisation due to their ability to address child protection risks through their policies, procedures and systems and the type of work the organisation engages in (e.g. if they are a child focussed organisation, their risks will be higher).			
<b>LOW</b>	<b>NO FOCUS</b>	<input type="checkbox"/>	Organisation is not a child-focused organisation ( you answered No to all questions in Step 2 – Focus)
<b>MODERATE</b>	<b>FOCUS &amp; STRONG SYSTEMS</b>	<input type="checkbox"/>	Organisation is a child-focused organisation and has good child protection systems in place (You answered Yes to any question in Step 2 Focus and had a majority of Yes answers to the questions under systems and controls)
<b>HIGH</b>	<b>FOCUS &amp; POOR SYSTEMS</b>	<input type="checkbox"/>	Organisation is a child-focused organisation and has poor or nil child protection systems in place (You answered Yes to any question in Step 2 Focus and had a majority of No answers to the questions under systems and controls)

**Step 3: Establish the overall potential child protection risk context and whether a full child protection risk assessment is required**

Once you've completed steps 1 and 2 you can establish the overall risk context by placing the results of each activity in the appropriate field below:

<b>Organisation level of contact with children and systems in place</b> (organisation inherent risk from Step 2)	<b>Activity Level of Contact with Children</b> (activity inherent risk from Step 1)		
	<b>NIL (LOW)</b>	<b>CONTACT (MODERATE)</b>	<b>WORKING (HIGH)</b>

<sup>4</sup> A yes would indicate that an organisation would require a higher degree of child safeguarding than the minimum detailed in the DFAT Child Protection Policy.

<sup>5</sup> 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.

<b>NO FOCUS (LOW)</b>	<input type="checkbox"/> No further assessment required	<input type="checkbox"/> No further assessment required, monitor for changes	<input type="checkbox"/> Full assessment required
<b>FOCUS &amp; STRONG SYSTEMS (MODERATE)</b>	<input type="checkbox"/> No further assessment required, monitor for changes	<input type="checkbox"/> No further assessment required, monitor for changes	<input type="checkbox"/> Full assessment required
<b>FOCUS &amp; POOR SYSTEMS (HIGH)</b>	<input type="checkbox"/> Full assessment required	<input type="checkbox"/> Full assessment required	<input type="checkbox"/> Full assessment required

**If the matrix indicates a full child protection risk assessment is required**

Implementing Partners:

- conduct a full assessment of the child protection risks within the organisation and activity using the organisation’s internal risk processes and documentation using their own risk management framework.
- show evidence to DFAT that the assessment has been completed and documented in accordance with its internal risk processes.

DFAT Staff:

- conduct a full assessment of the child protection risks at design, tender, contract negotiation, implementation, monitoring and evaluation for the lifecycle of the activity, in accordance with the *Aid Programming Guide* and the *Risk Management for Aid Investments Better Practice Guide*.

**If the matrix indicates a requirement for monitoring of child protection risks**, it is recommended that the risk be included in the relevant Investment risk register and monitored accordingly.

Identify and record who completed the steps above and when full assessment (if required) will be completed.

Definitions

Definition	
<b>Working With children</b>	<p>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.</p> <p><i>The risks of child exploitation and abuse generally increase with the frequency of contact, meaning that working with children is a higher risk than contact with children.</i></p>
<b>Examples</b>	<p>Activities or services for children:</p> <ul style="list-style-type: none"> <li>• Disability service: school for the deaf</li> <li>• Cultural youth exchange</li> <li>• Residential care</li> <li>• Child protection services</li> <li>• Justice facilities for children</li> <li>• Childcare services</li> <li>• Child education services: Children in sports</li> <li>• Child accommodation services</li> <li>• Health services: Access to Sexual &amp; Reproductive Health</li> <li>• Counselling and support services for children</li> <li>• Emergency response: Humanitarian assistance to children and families</li> </ul>

<b>Contact With children</b>	<p>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.</p> <p><i>Contact covers contact with children in the community not associated with the work being performed.</i></p>
<b>Examples</b>	<ul style="list-style-type: none"> <li>• Any in-country work, in particular working in remote/rural locations</li> <li>• Oral and written communication (including electronic communication) relating to a child</li> <li>• Visiting premises e.g. schools, health or residential facilities, that provide services to children</li> <li>• Any community consultation (data collection, surveying, training)</li> <li>• Women and Gender focussed activities</li> <li>• Health Sector Programs</li> </ul>

**Attachment 12: Child Protection Risk Assessment Template**

Child Protection Risk Assessment Template								
Risk Factor	Typical impact if risk materializes	Risk likelihood	Risk Impact	Mitigation procedure	Overall Assessment	Financial Risk	Actions taken to limit risk in past year	Actions planned to limit risk in coming year

**Attachment 13: Signed code of Conduct register template**

<b>No</b>	<b>Date</b>	<b>Name</b>	<b>Date Contract Started</b>	<b>Date Contract Ends</b>	<b>Code of Conduct (Date signed)</b>
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					