

Appendix 6. Child Protection Policy

(Next review by November 2025)

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Responsible person	CEO	Scheduled review date by	Nov 2025

Introduction

Assisi Aid Projects (Assisi) has a long history of working with children and is serious about its duty of care to respect, protect and safeguard children. Assisi has a zero tolerance towards child exploitation, abuse, neglect and harassment. As outlined in Assisi's Strategic Plan 2022-27, Assisi is committed to respecting, protecting and promoting human rights. Assisi recognises that children are one of the most vulnerable groups in society and believes that all children have the right to be safe and protected. In Assisi's prevention and response strategies to assist children who are at risk or have been abused, neglected, exploited or harassed, Assisi follows a survivor centred approach and recognition of the best interests of the child. This means Assisi ensures the needs and rights of children are central to all policies and actions, and that survivors are treated with dignity and respect.

Assisi also recognises that certain children may be at higher risk of abuse, such as children with disabilities, children with diverse genders and sexualities, and those from a lower socio-economic background, among others. Assisi is proactive in addressing these issues and risks through assisting partners to conduct gender and disability analyses to inform risk assessments and project activities, ensuring Child Protection champions/ focal points understand the heightened risks for certain children, and adapting child protection materials if required.

Purpose

The Child Protection Policy aims to provide a safe, protected and nurturing environment for all children involved in Assisi's projects.

The Policy details the systems and processes Assisi will undertake to prevent abuse and to act expeditiously when intervention is required, including:

- Recruitment and screening processes

- Code of Conduct
- Training and awareness
- Working with partners
- Communications and promotion activities
- Risk management
- Reporting procedures
- Breaches of policy

Scope

This policy applies to all Assisi staff, members, Governing Body members (including both Committee of Management and subcommittee members), volunteers, interns, representatives, contractors, and visitors to project sites (hereinafter referred to as “personnel”). All personnel have a moral and legal obligation to protect children and report suspected or confirmed threats or harm.

Assisi is firmly committed to working with its in-country partner organisations and stakeholders to ensure Assisi’s projects comply with this policy, and to support partners to strengthen their own child protection practices.

Children are at high risk of Sexual Exploitation, Abuse and Harassment (SEAH). Assisi does not tolerate these behaviours, as outlined in our Preventing Sexual Exploitation, Abuse and Harassment Policy. Concerns relating to children and SEAH should be reported under the Child Protection Policy.

Definitions

Assisi adopts DFAT’s definitions, as found in DFAT’s Child Protection Policy, 2018.

Abuse:

Abuse includes:

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—refers to 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.

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.

Note: the above includes a child or children being present (hearing or seeing) while a parent or sibling is subjected to any of the above.

Child or children: In accordance with the United Nations Convention on the Rights of the Child, 'child' means every human being under the age of 18.

Child exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for purposes or for profiting sexually, monetarily, socially or politically from exploitation of a child.

Covers one or more of the following:

- Committing or coercing another person to commit an act or acts of abuse against a child.
- Possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material.
- Committing or coercing another person to commit an act or acts of grooming or online grooming.
- Using a minor for profit, labour, sexual gratification, or some other personal or financial advantage.

Child pornography: In accordance with the Optional Protocol to the Convention on the Rights of the Child, 'child pornography' means any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes.

Grooming: Generally, refers to behaviour that makes it easier for an offender to procure a child for sexual activity. For example, an offender

might build a relationship of trust with the child, and then seek to sexualise that relationship (for example by encouraging romantic feelings or exposing the child to sexual concepts through pornography).

Online grooming is the act of sending an electronic message to a recipient who the sender believes to be under 16 years of age, with the intention of procuring the recipient 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 to be under 16 years of age.

Harm: Any detrimental effect on a child’s physical, psychological, or emotional wellbeing. Harm may be caused by financial, physical, or emotional abuse, neglect, and/or sexual abuse or exploitation whether intended or unintended.

Informed consent: When an individual agrees to engage in activities or for information or images of them to be used based upon a clear appreciation and understanding of the facts, implications, and consequences of their participation or use of their information or images. Consent must be properly informed and freely given by an adult, or a parent or guardian in the case of a child.

Working with children: 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 works.

Unacceptable risk: The portion of identified risk that cannot be tolerated, and that must be either eliminated or controlled. For people deemed an unacceptable risk, control mechanisms are not considered appropriate.

Policy

Roles and Responsibilities

As outlined in the Policy Overview, there are roles and responsibilities that apply to all policies. In addition, the following apply specifically to this policy.

Responsibilities of the Committee of Management:

- Remain aware of potential breaches in child protection and report these as per the reporting procedure.

Responsibilities of Chief Executive Officer:

- Remain aware of potential breaches in child protection and report these as per the reporting procedure.
- Ensure risks to children are considered in all project risk assessments.
- Proactively put in place measures to promote child protection including arranging timely and appropriate training for personnel and partners in issues of child protection and supporting partners to develop their own child protection policies.
- Ensure all personnel are aware of this policy and sign Assisi's Code of Conduct.

Responsibilities of all other personnel:

- Remain aware of potential breaches in child protection and report these as per the reporting procedure.
- Comply with this Policy and Assisi's Code of Conduct.

Recruitment and Screening

Assisi is committed to preventing a person from working with children if they pose an unacceptable risk to children and will follow child safe recruitment and screening processes as outlined in the Human Resources section of Assisi's Good Practice Manual. The level of checks varies depending on the position and the potential contact with children. The checks include:

- Child safe interview questions, referee checks, working with children checks, and national Police Checks. Ensure working with children checks are renewed prior to expiry, and staff police checks renewed biannually.
- All job advertisements and position descriptions detail Assisi's commitment to protecting children.
- Employment contracts detail expectations regarding a safe organisation environment, as well as clear provisions for dismissal, suspension or transfer to other duties for any personnel who breach the Child Protection Policy and Code of Conduct.

Code of Conduct: Standards of Professional Behaviour

Assisi's Code of Conduct includes clear guidelines as to what is acceptable and unacceptable behaviour in relation to working and interacting with children. It establishes a common understanding of the standards of behaviour and appropriate boundaries expected of staff and those in close contact with children and it promotes transparency and accountability.

All Assisi personnel are expected to sign and adhere to the Code of Conduct.

Training and awareness

Assisi is committed to ensuring all Assisi personnel are aware of this Child Protection Policy and Assisi's Code of Conduct.

Upon induction or orientation, or after any policy revisions, all personnel will be provided with a copy of the Policy; briefed on all aspects of the Policy as part of their orientation or induction; and required to confirm that they understand the intent and requirements of the Policy.

Those who may have contact with or who are or may be working with children, are required to participate in regular annual child protection awareness training.

All staff, interns and volunteers (including Committee of Management and Sub-Committee members) are to receive appropriate training regarding abuse awareness, protection of participants and current legislative environment within six months of joining Assisi.

Working with Partners

Assisi is committed to working with partners to develop, strengthen and maintain their own organisational policies and procedures to keep children safe and protected. This includes supporting them to develop policies, codes of conduct, child safe recruitment, participate in training and identify and mitigate risks to children in projects. Further they will be supported to develop reporting procedures in line with the local laws of their country.

Assisi and partners will prioritise improving procedures in projects that are deemed to be the greatest risk to children's safety, such as projects that work directly with children. Where required, direct child protection activities will be incorporated into project objectives and plans.

All Memorandum of Understanding and Project Agreements will clearly detail Assisi's expectations regarding maintaining children and vulnerable persons' safety, and partner obligations as recipients of Australian funding (such as DFAT).

Communications and Promotion Activities

Assisi will ensure that any use of images and personal information for promotion, fundraising and development education ensures the privacy and safeguarding of children. General principles include but are not limited to:

- Not disclosing information that could identify the location of a child.
- Clear guidelines on how children are portrayed in images and reporting. This includes appropriate written permission from either the subjects of the photos or their legal guardians, which confirms that the subject understands the purpose and possible usage of the image and consents to its use for that purpose.
- Designated image and content approval process at which child safeguarding is examined at critical junctures before approval and use.

More detailed guidance on procedures to ensure this are contained in Section 6.2 of our Good Practice Manual 'Public Communications'.

Risk Management

Assisi recognises the importance of proactively assessing and managing risks to children in order to reduce the risk of harm. This occurs in several ways:

1. Risk Assessment at the organisational level

Assisi maintains an organisational wide Risk Register that is reviewed every quarter or in the case of an incident. This register assesses child protection risks such as: risk of non-compliance with policy, risk of systems and procedures failure, support and compliance from in-country partners, emergencies and disasters, reputation and so on. Mitigation strategies are also put in place.

2. Risk Assessment in projects

All projects and activities include child protection risks as part of their project level risk assessment. Mitigation strategies are put in place for any risk identified and these (and any emerging risks) are actively monitored throughout the activity/program cycle or in the case of an incident.

Reporting procedure

Assisi has adopted principles that will underpin intervention when abuse has been identified.

- The rights and welfare of the child are of prime importance. Every effort will be made to protect the rights and safety of the child throughout any investigation into a reported incident.
- All actions must uphold a 'do no harm' principle, to ensure that any support provided will only act to protect, rather than make the child or young person more vulnerable.
- Assisi will treat all concerns raised seriously and ensure that all parties will be treated fairly, and the principles of natural justice will be a prime consideration. All reports will be handled professionally, confidentially, and expediently.
- All reports made in good faith will be viewed as being made in the best interests of the child regardless of the outcomes of any investigation. Assisi assures that no action will be taken against those who inform of incidents or risks in good faith. Assisi will take steps to ensure a person can report without retaliation. However, anyone who wilfully informs using false information or accusations may be subject to disciplinary action.

1. Who should report?

It is mandatory for all Assisi personnel, partner organisation staff, or project participants, to report any witnessed, suspected, or alleged incidents of child abuse or any breach of the Child Protection Policy and/or the Assisi Code of Conduct in relation to children.

2. What should be reported?

Any disclosure, concern or allegation regarding the safety, abuse, or exploitation of a child (this includes actual, suspected, or risk of abuse or harm to a child). This includes any child pornography or child abuse that is received through Assisi-supported electronic equipment.

This may relate to a child and/or personnel involved in Assisi's work both in Australia and overseas. It may also include a concern about a child or person outside of the organisation programs, such as a community member. Overseas child abuse investigations will comply with local laws and penalties.

3. When to report?

Concerns should be raised immediately.

4. Process for reporting

Making a report:

- If Assisi personnel become aware of a Child Protection incident in Assisi's work in Australia and/or overseas they must immediately report it to the Assisi Chief Executive Officer (CEO).
- Reports can be made via email to CEO via assisi@assisi.org.au, via phone on +61 3 90709040, or in person to CEO. The Complaints Procedure is publicly available on Assisi's website (www.assisi.org.au) and outlines how a report can be made.
- Assisi personnel should immediately document any relevant information which details how they learned of the incident, and/or other witnesses or persons who may have relevant information. If any verbal complaints are initially made, they should be reduced to writing and sent in as soon as possible.
- If it is not possible or appropriate to report to the Assisi CEO, a report should be made to the Committee of Management President via president@assisi.org.au or any other member of the Committee of Management.
- If it is not possible or appropriate to report to both the Assisi CEO and President, the report should be escalated to the next nearest figure of authority, i.e., the Assisi Vice-President or Secretary.

If the child is in immediate danger, actions should be taken to safeguard the child, as the first priority.

Acting on the report

- Once an incident has been reported to the Assisi CEO, the CEO will report to the Committee of Management President within 24 hours.
- The CEO and/or Committee of Management President will then, if required, gather more information to:
 - Identify immediate and potential risks to the child or young person;
 - Develop and implement an Action Plan to ensure the child's safety.
- The Action Plan will include but is not limited to the following:
 - Report the matter to local police and/or the child protection authority; **and/or**
 - Ensure referral and support for the child; **and/or**
 - Report the incident to the Australian Federal Police when it is suspected or becomes clear that a crime has been committed regarding child sex tourism, child sex trafficking and child pornography; **and/or**
 - Report the matter to the partner CEO if relevant; **and/or**
 - Manage internally in accordance with Assisi's human resources procedures if not a criminal Code of Conduct matter; **and/or**
 - Determine that the occurrence is not appropriate for investigation under this policy (for example the individual is over 18, and the incident should be investigated under a different policy); **and/or**
 - If deemed appropriate it may be necessary to de-identify the victim/survivor, consistent with a survivor-centred approach.
 - Report the incident to DFAT at childwelfare@dfat.gov.au / +61 2 6261 9048 immediately.

Data Privacy and Sensitive Information

With regards to data security, ensuring privacy, safety, and confidentiality for all participants, please refer to Assisi's Privacy Policy.

Breaches of Policy

A failure to comply with the Child Protection Policy and/or the Assisi Code of Conduct may lead to disciplinary action, legal action, a criminal investigation and prosecution. Any investigation into an alleged breach of the Child Protection Policy and/or Assisi Code of Code will be conducted in line with the principle of procedural fairness. During the process of investigation, personnel may be stood down or restricted from all duties, or those duties involving contact with children and beneficiaries, or be placed on leave with or without pay, and/or suspended from all duties related to their employment.

Relevant documents

Assisi – Child Protection Policy Amendment (Appendix 6A-6A.1)

Assisi – Code of Conduct

Assisi – Human Resources section

Assisi – Program Manual

Assisi – Risk Management Procedures

Assisi – Policy for the Prevention of Sexual Exploitation, Abuse and Harassment

ACFID – Code of Conduct

DFAT – Child Protection Policy

DFAT – Child Protection Code of Conduct