Appendix 6. Child Protection Policy

(Next review by November 2029)

Policy number	6	Current policy version	7
Original policy approved on	Aug 2009	Previous review date	Nov 2022
Current policy reviewed by CEO	CC	Current version approved by Committee of Management on	Nov 2026
Responsible person	CEO	Scheduled review date by	Nov 2029

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.

Child Protection Broader Context

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. Development contexts can also increase vulnerability for children. Younger children may lack the communication skills needed to seek help or report harm. Children separated from parents in crisis situations may not have adult protection. Children with disabilities may depend on others for personal care, increasing exposure to risk. Where child protection laws and enforcement are weak, children face heightened risks of abuse and exploitation.

The effects of harm to a child can have lifelong consequences for that child, their families and their communities. Harm experienced in childhood can have significant and lasting effects. These can include poor health outcomes, loss of identity and self-esteem, loss of healthy social contact, mental health issues, reduced educational outcomes, drug and alcohol abuse and an increased likelihood of coming into contact with the law.

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 in line with required compliance and recognised good practice standards.

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 Department of Foreign Affairs and Trade's (DFAT's) Child Protection Policy, 2025.

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 unless under the law applicable to the child, majority is attained earlier. For the purposes of this policy, Assisi considers a child to be a person under the age of 18.
Child exploitation	Child exploitation encompasses acts that involve the use of a child for another person's advantage, gratification or profit, often resulting in harm to the child's physical or mental health, development or wellbeing. Under Australian law, this includes, but is not limited to the following: • Sexual exploitation of children: Engaging a child in sexual activities for remuneration or any other form of consideration, coercing or deceiving a child into sexual activities, or using a child in child sexual abuse materials. • Child exploitation material: Possessing, controlling, producing, distributing, obtaining or transmitting audio, video or textual material that depicts or describes a person who is, or appears to be, under 18 years of age, in a sexual context or subjected to abuse, cruelty or torture. This definition encompasses both real and simulated representations, including AI-generated or animated depictions. • Grooming: Engaging in predatory conduct to prepare a child for sexual activity at a later time, including building a relationship of trust with the child, their family or community to facilitate abuse. This may include online grooming. • Trafficking and forced labour: Recruiting, transporting, transferring, harbouring or receiving a child for the purpose of exploitation, including forced labour, slavery, or practices similar to slavery. • Use of a child for illicit activities: Exploiting a child in criminal activities, such as drug trafficking or production. These actions are criminal offences under various Australian laws, including the *Criminal Code Act 1995* (Cth), and are subject to severe penalties.
Child abuse	Includes physical abuse, emotional abuse, sexual abuse, ill-treatment, neglect, and online or digital abuse. It also includes a child or children witnessing such abuse against another child or adult.
Child sexual abuse	Child sexual abuse involves engaging a person under the age of 18 in sexual activities. This encompasses a range of behaviours, including but not limited to: • Sexual touching of any part of the child's body, whether

	clothed or unclothed • Engaging in sexual acts with a child • Persuading, coercing or forcing a child to participate in sexual activities • Exposing a child to sexual acts or materials, including pornography • Using a child to produce or appear in child abuse content • Grooming a child for sexual contact, including though digital platforms.
Harm	Refers to 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.
Victim-survivor	Victim-survivor is a term used to describe a person who is, or has been, abused, exploited or harmed. 'Victim-survivor' acknowledges both the harm suffered (victim) and the resilience or agency of the child in coping with the aftermath (survivor). This term emphasises a supportive, rights-based approach to addressing their needs and upholding their dignity throughout the reporting and response process.
Safeguarding	Actions, policies and procedures that create and maintain protective environments to protect people from exploitation, harm and abuse of all kinds.
Transactional sex	The exchange of money, employment, goods, services or other benefits for sex or sexual acts.

Guiding Principles

Principle 1: Zero tolerance of child exploitation, abuse and harm

Assisi has zero tolerance for child exploitation, abuse and harm in all aspects of its work. This means zero tolerance for acts of child exploitation, abuse and harm and zero tolerance for inaction to prevent, report or respond to child exploitation, abuse and harm.

Principle 2: Prioritise the best interests of the child

Assisi and partners must ensure that all actions and decisions prioritise children's rights, safety and wellbeing and are underpinned by a 'do no harm' approach. Responses to incidents must be trauma-informed, child-centred and enable access to support services.

Principle 3: Promote inclusion and equity and recognise diversity

Assisi and partners must be welcoming and inclusive of all children regardless of their circumstances, abilities, sex, gender, sexual orientation, ethnicity, age, displacement, and social, economic and cultural backgrounds. Efforts must address barriers to participation, protection, reporting and support such as language, safety, discrimination and accessibility.

Principle 4: Prioritise prevention

Assisi and partners must be proactive in promoting the safety of children and minimising risks to children. Actions to protect children must be embedded in policies, programs, recruitment, staff training and daily operations to minimise risks and protect children - both in physical and online spaces - in line with required compliance and recognised good practice standards.

Principle 5: Adopt an empowering and participatory approach

Assisi and partners must empower children to understand their rights, express concerns, and participate in decisions affecting them in ways that are age-appropriate, voluntary and safe. Families and communities must be engaged as partners in promoting child safety and wellbeing, fostering trust and enhancing collaboration.

Principle 6: Reporting incidents is mandatory

Mandatory and immediate reporting of child protection concerns related to Assisi business is required. Reporting and response mechanisms must be clear, accessible (including to children) and confidential. Reporting mechanisms must ensure that those who raise concerns are protected and that concerns are addressed effectively and in a timely and appropriate manner.

Principle 7: Embed safeguarding into organisational culture and leadership

Assisi and partners must embed child protection in governance, leadership and institutional culture. A strong safeguarding culture requires clear accountability, leadership commitment, investment of resources and continuous review and improvement of policies and practices.

Policy Roles and Responsibilities

As outlined in the Policy Overview in Assisi's Good Practice Manual, 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 in line with required compliance and recognised good practice standards.
- 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.

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.

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.

- <u>Who should report?</u>

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.

Reporting is not mandatory for victim-survivors, however reporting is encouraged to enable support and care to be provided.

- 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.

- When to report?

Concerns should be raised immediately (within 24 hours).

- 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 +61 452 065 747, 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 elizabeth.morris@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 childprotection@dfat.gov.au / +61 2 6261 9048 immediately (within 24 hours).

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:

- 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. SEAH risks and protection from SEAH are a standing agenda on all Assisi Committee of Management meetings.

- 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 to the Committee of Management

The Chief Executive Officer will provide a report on safeguarding incidents and risks on a quarterly basis to the Committee of Management as a standing item on the meeting agenda.

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.

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, at least two 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 every 3 to 5 years depending on level of contact with children and state or territory requirements.
- 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.

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, in line with required compliance and recognised good practice standards. 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) and in line with required compliance and recognised good practice standards.

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 the legal guardians of the child subject, as well as the child themselves where age appropriate, 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'.

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

Reference List

ACFID – Guidance for the development of a Child Safeguarding Policy

https://acfid.asn.au/wp-content/uploads/2022/05/ACFID-Code-of-Conduct-Guidelines-for-the-Development-of-a-Child-Safeguarding-Policy_Nov-18.pdf

DFAT – Protection from Sexual Exploitation, Abuse and Harassment Policy

Protection from Sexual Exploitation, Abuse and Harassment Policy

DFAT – Interim Guidance on DFAT's PSEAH and Child Protection Policies

DFAT's Protection from Sexual Exploitation, Abuse and Harassment and Child Protection Policies

DFAT – Child and Adult Safeguards Implementation Handbook for Staff and Partners

https://acfid.asn.au/good-practice-toolkit-2023/definitions/general-definitions/