

PM1.2 CHILD AND VULNERABLE PERSONS SAFEGUARDING POLICY

1. Purpose

This policy seeks to protect children and other vulnerable persons from exploitation and abuse of all kinds in the delivery of the Archbishop of Sydney's Anglican Aid activities through the Anglican Aid Fund, Overseas Ministry Fund and the Overseas Relief and Aid Fund

2. Scope

This policy applies to all Anglican Aid staff and volunteers working in Australia and while undertaking duties on behalf of Anglican Aid overseas for all funds (ORAF, Anglican Aid and OMF). This policy applies to Anglican Aid's Overseas Relief and Aid Fund's interactions with its in-country partners with respect to activities funded by Anglican Aid, as well as Anglican Aid paid contractors. Where this policy is inconsistent with the Safe Ministry provisions of the Anglican Diocese of Sydney, Safe Ministry provisions will prevail.

Domestic partners (Community Care) are required to be bound by policies of the Anglican Church of Australia. Overseas partners (Overseas Relief and Aid Fund) will have their own child and vulnerable persons safeguarding policies that meet or align with the standards outlined in this policy. If they do not have their own, then they are covered under this policy, however Anglican Aid will be working to support them in the development of policies appropriate to their context.

This obligation has been extended to all of Anglican Aid's operations and activities. As Anglican Aid is a Sydney Diocesan organisation, it is bound by the Diocese's policies on child safeguarding and safe ministry requirements and guidelines.

3. Definitions

Term	Description
Anglican Aid	Means the Archbishop of Sydney's Anglican Aid, a body corporate which administers the Anglican Aid Fund, the Overseas Ministry Fund and the Overseas Relief and Aid Fund. ORAF is the fund which has ACFID accreditation.
Anglican Aid Fund (AAF)	This fund provides welfare support to churches in Australia and partners overseas for activities of a benevolent nature consistent with the PBI rules.
Anglican Aid Staff	Includes full-time, part time, casual, and also those engaged on short term contracts such as: consultancies, researchers, interns, photographers, volunteers, etc.
Anglican Church of Australia child safe policies	Includes Faithfulness in Service and all policies and procedures relevant to the child safe protocols of the Anglican Church of Australia and the Diocese of Sydney.
Bullying	The inappropriate use of power by an individual or group, with an intent to harm, either physically or emotionally. It is

	usually deliberate and repetitive. The bullying may be physical or psychological (verbal and non-verbal).
Abuse	Includes physical, sexual, emotional abuse, neglect, bullying, forced (or child) labour, and domestic violence
Child and Young Person	Is regarded to be any person under the age of 18 years, unless a nation's laws recognise adulthood earlier.
Child Safeguarding	Is the term used to describe the responsibilities and activities undertaken to prevent or stop children being abused or maltreated.
Children in emergencies	Children in emergencies are especially vulnerable to abuse and exploitation. In an emergency or crisis situation, children are extremely vulnerable when they become part of a displaced or traumatised population.
Duty of Care	Is a common law concept that refers to the responsibility of the organisation to provide children and vulnerable persons with an adequate level of safeguarding against harm. It is the duty of the organisation to protect children and vulnerable persons from all reasonably foreseeable risk of injury.
Emotional Abuse	Occurs when a child or vulnerable person is repeatedly rejected or frightened by threats. This may involve name calling, being put down or continual coldness from parent or caregiver, to the extent that it affects the individual's physical and emotional growth.
Exposure to Domestic Violence	Domestic violence occurs when children or vulnerable persons witness or experience the chronic domination, coercion, intimidation and victimisation of one person by another by physical, sexual or emotional means within intimate relationships.
External Conduct Standards Regulations	Australian Charities and Not-for-profits Commission Amendment (2018 Measures No. 2) Regulations 2018, commenced 23 July 2019
Neglect	The persistent failure or the deliberate denial to provide a child or vulnerable person with clean water, food, shelter, sanitation or supervision or care to the extent that the individual's health and development are placed at risk.
Overseas Ministry Fund (OMF)	This fund provides support to Anglican churches to support theological education, evangelistic activities and supporting ordained clergy in related activities.
Overseas Relief and Aid Fund (ORAF)	ORAF is the relief and aid fund undertaking long term development and relief projects in developing countries.
Particularly Vulnerable Children	Child abuse takes place not only within the family environment, but also outside the family, including: institutions, at work, on the streets, in war zones and emergencies.
Partner Organisations	Any organisation, domestic or overseas, that has entered into Partnership with ORAF, in order to implement and/or support initiatives to projects through ORAF which provide support directly to children or vulnerable persons.

Physical Abuse	Occurs when a person purposefully injures or threatens to injure a child or vulnerable person. This may take the form of slapping, punching, shaking, kicking, burning, shoving or grabbing. The injury may take the form of bruises, cuts, burns or fractures.
Safe Ministry	The Sydney Anglican Church Diocese of Sydney's policies and processes for provision of care and safeguarding of children and others by ministry staff and volunteers which can be found at http://safeministry.org.au/
Sexual Abuse	Occurs when a child or vulnerable person is used by another person for his or her own sexual stimulation or gratification. These can be contact or non-contact acts, including threats and exposure to pornography.
Vulnerable Persons	Vulnerable individuals are those who are unable to take care of themselves, or protect themselves from harm or exploitation. There may be a number of reasons for this inability including: mental or physical disability, economic, social, religious or cultural disadvantages, or victims of emergency or crisis situations. Vulnerability may be permanent or temporary.

4. Policy Statement

Abuse or exploitation of any person is unacceptable and will not be tolerated by Anglican Aid. Anglican Aid's theological conviction that every person is made in the image of God informs the seriousness with which Anglican Aid treats concerns of abuse and exploitation, and motivates our commitment to upholding the value, dignity and rights of every person.

Therefore Anglican Aid will promote the safety and well-being of all children and vulnerable persons accessing its services and programs funded by ORAF, OMF and the Anglican Aid Fund, to minimise the risk of abuse.

Relating to child safeguarding specifically, Anglican Aid will adhere to local and international child safeguarding laws, which prohibit the abuse and exploitation of children. These include local laws where Anglican Aid's programs exist, and international laws in relation to all forms of child abuse and child exploitation, including: child sex tourism, child sex trafficking, child labour and child pornography.

All people have a right to be safe at all times, and Anglican Aid has an obligation to provide safe and protective services and environments.

Anglican Aid understands that effective risk mitigation and safeguarding measures are required to protect children and other vulnerable persons from abuse or exploitation. Anglican Aid recognises that this is a shared responsibility between it, its in-country partners and individual contractors.

Anglican Aid takes proactive steps to consider the safety and interests of children and vulnerable persons' throughout its Project Management Cycle.

Anglican Aid adheres to this policy as part of its compliance with the Safe Ministry Guidelines of the Anglican Church of Australia, Diocese of Sydney.

Anglican Aid is committed to educating its staff and other affiliates in this policy, to reduce the risks of abuse and exploitation to children and vulnerable persons, and to create safer environments for all people and communities it works with.

Adherence to this policy and the Code of Conduct is a mandatory requirement for all Anglican Aid staff and volunteers.

5. Procedures

(a) Employment of Anglican Aid Staff and Contractors and Recruitment of Volunteers

Anglican Aid is committed to screening, selecting and recruiting staff and volunteers that uphold the rights and dignity of all people, especially children and other vulnerable persons. The following procedures outline how Anglican Aid recruits the safe and suitable staff and volunteers. Anglican Aid's recruitment practices include, but are not limited to:

- Recruitment advertisements and selection criteria regarding child-related positions must include the following criteria: “It is an offence under the NSW Child Safeguarding Act for a person convicted of a serious sex offence to apply for this position. Relevant screening will be conducted.” Any person with an adverse WWCC is not to be employed by Anglican Aid in any position which requires working with children if they present an unacceptable risk to children.
- Personal interviews will be conducted for all staff and volunteer positions that may involve contact with children or vulnerable persons. Positions which may involve working with these individuals will include child and vulnerable persons safeguarding questions in the interview. Verbal referees are required for all positions who may have contact with children and vulnerable persons, including information about the applicant’s suitability to work with these individuals.
- All Anglican Aid Staff and volunteers involved in positions requiring contact with children in Australia or overseas will be required to have a Working with Children Check, through the NSW Office of the Children’s Guardian.
<http://www.kidsguardian.nsw.gov.au/working-with-children/working-with-children-check>. Where WWC checks are unavailable, criminal record checks, statutory declarations or a local legal equivalent (where criminal record checks are unavailable or unreliable) are required. For more information please see HR5.3 Recruitment Policy and PM7.2 Staff Field Trip Policy.
- All Anglican Aid staff and volunteers involved in positions requiring contact with vulnerable persons will in compliance with relevant laws, have appropriate background checks performed the Children’s Guardian.
- Individuals with a prior conviction of any crime against children, or sexual exploitation or abuse of an adult are not be employed or engaged for any work which may pose a risk to children or vulnerable persons.
- Volunteers from third party organisations will be required to read and sign Anglican Aid’s CPP and the Code of Conduct prior to travelling overseas.
- All staff, individual contractors and volunteers will be required to read and sign Anglican Aid’s CPP and the Code of Conduct at the commencement of employment.
- Anglican Aid reserves the right to refuse employment or terminate any person’s employment that may pose a risk to children or vulnerable persons.
- All staff and volunteers will be provided a copy of this policy and its procedures upon commencing work with Anglican Aid. The policy will be included as part of induction into the organisation. The policy will be discussed annually at staff meetings with all staff.

See HR5.3 Recruitment Policy for a detailed outline of Anglican Aid recruitment screening practices.

(b) Capacity Building of In-Country Partners

i. ORAF Partners

At the Partnership Application level, in-country partners will be assessed on their child and vulnerable persons safeguarding policy. Some partners do not

have a child and vulnerable persons safeguarding policy and some may not require one given the nature of the activities undertaken, however, in lieu of a partner's policy, the principles and requirements captured under the scope of this policy will be extended to the partner also, and this will be reflected in appropriate partnership agreements. The development of new partnerships will not be excluded if a partner does not possess an equivalent policy.

However, any ORAF child related program which does not have a child safeguarding policy will not commence until demonstrating they have a child safeguarding policy and are able to implement it.

ii. Anglican Aid and Overseas Ministry Fund Partners

For partners which have projects supported by the Anglican Aid Fund or Overseas Ministry Fund which involve children or vulnerable persons as beneficiaries, the minimum provisions of the ACNC's External Conduct Standards (3) and (4) will apply to any partnerships. Anglican Aid will work with partners to improve their Child and Vulnerable Persons safeguarding policy and help partners deepen their understanding of the rights of individuals. This may include the provision of Anglican Aid's Child and Vulnerable Persons Safeguarding Policy, as well as supporting the training of staff to increase awareness and understanding of safeguarding measures.

(c) Processes in Reporting Abuse and/or Exploitation

The abuse and exploitation of children or vulnerable persons is unacceptable. Anglican Aid will take all concerns and reports of abuse seriously and act on these reports immediately.

It is mandatory for all Anglican Aid staff and others to report concerns or allegations of abuse. These concerns may relate to a child or a staff member involved in the organisation or a concern about a child or persons within the overseas programs.

In Australia, reports of abuse must follow the protocols in the Safe Ministry Policy. Any abuse of children or vulnerable persons overseas must be documented and reported to a senior person in the partner organisation and followed up with a written report to that person referencing verbal communication, a copy is to be sent to the CEO of Anglican Aid.

Anglican Aid will ensure that the partners it works with possess or are developing reporting mechanisms to enable children, vulnerable persons and any other beneficiaries or project staff to report cases of abuse or exploitation.

(d) Project Management Cycle

Anglican Aid is committed to considering Child and Vulnerable Persons Safeguarding Policies and Procedures when implementing the Project Management Cycle in both ORAF and AAF. Anglican Aid understands that the mitigation of risks require a joint effort between Anglican Aid and the Partner Organisation. Anglican

Aid will give extra consideration to the suitability of a project during the project appraisal phase, for projects that work directly with children or vulnerable persons.

(e) Use of Children's Images

Anglican Aid will at all times portray children in a respectful, appropriate and consensual way. The following guidelines on the use of children's images are:

- A child should always be portrayed 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.
- Reasonable attempts should be made to ask a child and his or her family for consent when using their images. When asking for consent to use the image, details should be given as to how and where this image will be used.
- There should be no identifying information of the child used in the publication of images with their location.
- Children should be portrayed as part of their community.
- Local cultural traditions should be assessed regarding restrictions for reproducing personal images.
- Images should be an honest representation of the context and the facts.
- When sending electronically, file labels should not reveal identifying information.
- All photographers will be screened for their suitability, including police checks where appropriate.
- In line with its theological convictions, Anglican Aid will not use images for manipulative purposes in fundraising and will generally portray children in a positive light despite their economic situation.

(f) Consequences of Breaches

- It is expected that any suspected breach will result in an investigation.
- Any breach of this policy will be reported to the CEO or in the case of the CEO to the Chairman of the board. The CEO is required to notify the chairman of the board in the case of any investigations being undertaken.
- A range of penalties from warning and admonition, to counselling to dismissal may be imposed depending on the nature of any breach and the impact it has on others.
- Breaches involving criminal conduct must be reported by the appropriate management representative receiving the report to the police and the Professional Standards Unit, Diocese of Sydney.
- Disciplinary measures will vary between Anglican Aid's project partners, as each possesses its own procedures for addressing cases of abuse and exploitation.

6. Implementation by Partner Organisations

Effective Child and Vulnerable Persons safeguarding and risk mitigation measures are a shared responsibility between Anglican Aid, Partner Organisations and individual contractors. Anglican Aid understands that its Partner Organisations (ORAF and AAF) vary in organisational structure and policy strength, however Anglican Aid requires and expects its Partner Organisations to understand Child and Vulnerable Persons Safeguarding as a commitment. Our practices include, but are not limited to:

- (e) Considering Child and Vulnerable Persons Safeguarding policies when Partner Organisations apply for Partnership.
- (f) Partner Organisations developing a Child and Vulnerable Persons Safeguarding Policy in the context of the Partner nation.
- (g) Committing extra care for Child and Vulnerable Persons Safeguarding procedures in projects that work directly with children.
- (h) Considering Child and Vulnerable Persons Safeguarding concerns and procedures in project monitoring and evaluations.
- (i) Anglican Aid reserves the right to modify or terminate a Partnership agreement in the event of the Partner Organisation's breach of Child and Vulnerable Persons Safeguarding commitments.

7. Related documents

- Faithfulness in Service – A national code for personal behaviour and the practice of pastoral ministry by clergy and church workers (A Sydney Anglican Diocese publication) <http://safeministry.org.au/faithfulness-in-service-2014/>
- Safe Ministry Website <https://safeministry.org.au/>
- Code of Conduct for Working with Children (Attached)
- HR5.3 Recruitment Policy
- PM7.2 Staff Field Trip Policy
- ACNC External Conduct Standards: <https://www.acnc.gov.au/for-charities/manage-your-charity/governance-hub/acnc-external-conduct-standards>
- INF Nepal – Child and Vulnerable Adult Safeguarding Policy

8. Review

In order to ensure that this policy continues to be effective and applicable, the procedure will be reviewed annually in light of legislative and other changes which may occur.

DATE	COMMENT
30/10/18	PO7.2 Changed and Adopted

31/8/19	ACFID Code of Conduct amendments

ATTACHMENT A – Anglican Aid's Child and Vulnerable Persons Safe Code of Conduct

Code of Conduct for Working with Children and Vulnerable Persons

Anglican Aid Staff and Anglican Aid Others are responsible for maintaining a professional role with all people, but especially children and vulnerable persons. This means establishing and maintaining clear professional boundaries that serve to protect everyone from misunderstandings or a violation of the professional relationship.

All Anglican Aid staff and Anglican Aid Others should conduct themselves in a manner consistent with their role as an Anglican Aid representative and as a positive role model. All affiliates of Anglican Aid should endeavour to create and maintain safe environments that passively and actively prevent exploitation and abuse of others. As such, Anglican Aid has developed this code of conduct to protect children, vulnerable persons, staff and the organisation by providing clear behavioural guidelines and expectations.

All Anglican Staff and Contractors must sign this Code of Conduct before employment.

Anglican Aid's Child and Vulnerable Persons Safe Code of Conduct includes:

I will:

- Respect cultural differences and treat all people with dignity and respect in attitude, language and actions, both in person and on digital platforms;
- Be concerned with the reputation and perception of ANGLICAN AID and seek to reflect the organisation's Mission Statement, values and Core Beliefs in all of my relationships and activities, especially in relation to children and vulnerable persons.
- Provide a welcoming, inclusive and safe environment for all people, especially children and vulnerable persons, with whom I have contact;
- Encourage open communication between all children, young people, parents, staff and volunteers and have children and young people participate in the decisions that affect them;
- Encourage open communication between staff, volunteers and vulnerable persons and have vulnerable persons participate in decisions that affect them;
- Report any concerns of abuse to the appropriate people and speak up when I observe concerning behaviours of any person, including colleagues;
- Recognise that inappropriate behaviour towards children or vulnerable persons, including failure to follow these behaviour protocols, is grounds for discipline. (Disciplinary action will vary depending on the offence, and serious offences including sexual abuse will be considered gross misconduct resulting in instant dismissal from employment, volunteer/internship or board membership);
- Agree that at all times staff should be transparent in their actions and whereabouts;
- Take responsibility for ensuring that I am accountable and do not place myself in positions where there is a risk of allegations being made. (Where possible and practical, the 'two-adult' rule, wherein two or more adults supervise all activities where children or vulnerable persons are involved and are present at all times, should be followed. If this is not possible, ANGLICAN AID personnel are encouraged to look for alternatives such as being accompanied by community members on visits to children/vulnerable persons).

- Comply with any investigations related (internal or external) to safeguarding children or vulnerable persons, and provide information necessary for the completion of such investigations.

I WILL NOT:

- Engage in discrimination, prejudice, inappropriate or offensive language or oppressive behaviour of any kind that is intended to shame, humiliate or belittle another person, including children;
- Stay alone overnight with one or more children, understanding that it is unacceptable behaviour to take a child under my care to my home to stay overnight unsupervised or to sleep in the same bed as a child with whom I am working;
- Hire children as 'house help'. Even though providing employment for a child may be culturally acceptable and provide benefits not otherwise available to the child, it may lead to misunderstandings and is inconsistent with ANGLICAN AID's belief to ban exploitative child labour;
- provide drugs or alcohol to children at any time;
- provide any gifts that are inappropriate;
- use any inappropriate language or communication mediums that could be described as (but not limited to) abusive, exploitative, grooming, or culturally insensitive;
- Hold, kiss, hug, fondle or touch children or vulnerable persons in an inappropriate or culturally insensitive way. Whilst touch can be healthy and good, it is never appropriate if it is meeting the needs of the worker rather than the needs of the child or vulnerable person;
- Smack, hit or physically assault children or young people, nor use physical or mental abuse as a means of discipline. However, appropriate physical restraint may be needed to protect a child from harming themselves, myself or others;
- Do things of a personal nature that a child or vulnerable person can do for him/herself, such as assistance with toileting or changing clothes;
- Act in a way that shows unfair and differential treatment of children. (ANGLICAN AID personnel need to be aware that they may work with children, who because of circumstances and abuses they have experienced may use a relationship to obtain special attention. The adult is always considered responsible even if a child behaves seductively. Adults should avoid being placed in a compromising or vulnerable position);
- Develop sexual relationships with children or vulnerable persons or relationships with children or vulnerable persons that may be deemed exploitative or abusive;
- Behave provocatively or inappropriately with a child or vulnerable person;
- Condone or participate in, behaviour of children or vulnerable persons that is illegal, unsafe or abusive;
- Use photographs or videos of a child for publication in any form (including social networking sites such as Facebook) without making reasonable attempts to ask for the consent of the child's parents or guardians;
- Seek to make contact and spend time with any child or young person outside the program times.

- Use my own or ANGLICAN AID's computers, mobile phones, video and digital cameras inappropriately, nor use them for the purpose of exploiting or harassing children.
- Use any disciplinary measures towards children that are violent or intended to humiliate the child.
- Misuse private data of children, vulnerable persons or other beneficiary, partner or Anglican Aid staff related data/information.
- Remain silent, cover up or enable known or suspected cases of breaches of this policy or code of conduct, or any other forms of abuse or exploitation.

I acknowledge receipt of the ANGLICAN AID Child and Vulnerable Persons Safeguarding Policy and understand that I am required to adhere to it as an employee/volunteer/representative of Anglican Aid. I understand that breaches of this code may result in reports being made to the Children's Guardian and in cases where criminal behaviour is alleged to the NSW Police.

Signature _____

ANGLICAN AID Witness _____

Date _____