

Child Safeguarding Policy

PRO 3.2

Version	4
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Applicable to	Asian Aid Organisation (AAO) Ltd and its associated entities
Authority	AAO Board
Responsible Officer	AAO Safeguarding Manager
Responsible Office	Programs
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Scope/Short description	This policy is part of the Asian Aid Organisation (AAO) Policy Framework and is included within the Programs (PRO) Policy Manual
Related Asian Aid Documents	AAO HRM 1.0 Code of Conduct AAO HRM 1.2 Child Safe Code of Conduct AAO Child Safe & SEAH Allegation Management SOP AAO PRO 3.3 Prevention of Sexual, Exploitation, Abuse and Harassment (PSEAH) Policy AAO HRM 3.4 Gender Equality, Disability and Social Inclusion (GEDSI) Policy AAO HRM 3.5 Privacy Policy AAO HRM 3.13 Performance Counselling and Disciplinary Policy AAO HRM 3.19 Recruitment Policy AAO HRM 3.2 Induction Policy AAO COMS 3.2 Complaints Handling Policy AAO HRM 3.3 EEO, Discrimination and Harassment Policy AAO COMS 3.3 Ethical Communications Policy AAO COMP 6.0 Whistleblower Policy AAO Partnership Guidelines AAO Partnership Agreement AAO Child Focused Development (CFD) Framework and Project Guidelines AAO Safeguarding Committee Terms of Reference
Related Legislation and External Documents	United Nations Convention on the Rights of the Child (CRC) Department of Foreign Affairs and Trade (DFAT) Child Protection Policy 2017 and Guidance Notes ACFID Code of Conduct (2019 revisions) ACNC External Conduct Standards
Key Words	Safeguarding; SEAH; Protection

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1. POLICY STATEMENT

This Policy reflects Asian Aid Organisation's ("**AAO**", "**the organisation**", "**we**", "**our**", "**us**") commitment to safeguarding children and young people from harm, abuse, and exploitation. We recognise that violence against children and various forms of child exploitation are persistent, global problems, including within the societies and communities where we work. In our work, we have zero tolerance for all forms of child abuse and understand that we are all responsible for the care and safeguarding of children. This Policy defines the Guiding Principles, organisational approach and procedures, and child safeguarding minimum standards to be met across all aspects of our program to ensure AAO is a child safe organisation.

This Policy is aligned with guidance provided from the Australian Council for International Development (ACFID) and the Department of Foreign Affairs and Trade (DFAT) on child safeguarding policy development and has been reviewed in line with findings and recommendations made by the Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission). Further details on the international conventions and national obligations that have been benchmarked against in the revision of this Policy are included in Appendix I.

2. SCOPE

This Policy applies to:

- AAO, including:
 - AAO board members
 - AAO representatives- including all personnel (permanent, part-time, or casual), interns, individual contractors, and consultants
 - AAO volunteers- including specialised and general
 - AAO visitors- referring to photographers/videographers, journalists, and any other persons who visit an AAO-funded program and activity where contact with children and young people is facilitated as part of the AAO program or activity
 - AAO Partner Organisations

As per requirements outlined through Partnership Agreements, Partner Organisations must “pass on” the requirements of this Policy to the organisations, institutions, and individuals with which they work in the delivery of AAO-funded work.

This Policy applies in any and all contexts related to AAO's work, including when Partner Organisations are implementing programs funded by AAO.

3. PURPOSE

The purpose of this Policy is to:

- prevent child abuse occurring in any and all contexts related to AAO's work, including within our Partner Organisations' programs;
- establish an organisational culture of child safety, where child safeguarding is embedded in organisational leadership and governance;
- ensure AAO and Partner Organisations have in place policies, systems, and procedures to prevent and respond to child abuse and the actions and behaviour that put children at risk of child abuse, violence, and harm;

- ensure all AAO representatives, board members, volunteers and visitors, and Partner Organisations are aware of their responsibilities for identifying possible occasions for child abuse, for establishing controls and procedures for preventing such abuse and/or detecting such abuse when it occurs;
- where possible, work to raise the awareness children supported through AAO's programs of AAO's commitment to prevent and respond to risks of harm against them;
- ensure children supported through AAO's programs are aware of the rights and processes available to them to have all suspected instances of child exploitation and/or abuse reported, investigated, and acted upon by relevant authorities;
- ensure children are informed about all of their rights (including to safety and information) and are active participants in the design, review, and learnings of AAO's programs;
- ensure parents, guardians and community members linked to children within AAO's programs, are informed and involved in promoting child safety and wellbeing.

AAO strives to comply with national and local laws for child welfare and protection, or international standards, whichever affords greater protection.

4. GUIDING PRINCIPLES

This Policy is underpinned by the following set of principles that AAO and Partner Organisations must abide by when implementing this Policy.

1. *Best Interests of the Child*- AAO and Partner Organisations are dedicated to upholding the rights of the child and, in accordance with the United Nations Convention on the Rights of the Child (CRC), commit to developing programs to achieve the best outcomes, and therefore what is in the 'best interests' of every child and young person.
2. *High Standards in Resource Management*- AAO and Partner Organisations are dedicated to ensuring representatives consistently make a positive contribution to their programs and the children and young people they serve. AAO and Partner Organisations will vet each representative periodically in accordance with applicable state and national laws to ensure they are safe to work with children, and likewise ensure that board members, volunteers and visitors engaged with AAO and Partner Organisation programs (when/where applicable) are suitable to work with children.
3. *Zero Tolerance of Child Abuse, Mistreatment and Exploitation*- All children have the right to be safe, and thus have equal rights to protection from abuse and exploitation. AAO and Partner Organisations maintain a zero-tolerance stance on all forms of child abuse, neglect, and exploitation of children. Translated into practice, this therefore means AAO and Partner Organisations will not knowingly engage anyone who poses an unacceptable risk to children and young people, or partner with any organisation that does not meet AAO and Partner Organisations' child safeguarding standards.
4. *Preventative Approach*- AAO and Partner Organisations recognise the effects of abuse on children to be both devastating and long-term. While AAO and Partner Organisations acknowledge it is not possible to eliminate all risks, AAO and Partner Organisations are committed to establishing careful management structures to reduce the risk of harm to children and young people associated with AAO and Partner Organisations' program activities. In line with AAO and Partner Organisations' supporting policies and procedures, AAO and Partner Organisations will do this through the implementation of the respective organisation Risk Management Approach.
5. *Shared Responsibility*- AAO and Partner Organisations believe all members of the organisation have a

shared responsibility for safeguarding children. For this reason, AAO requires every person working for, or associated with, AAO's work to be aware of and commit to the provisions of this Policy. All representatives, board members, volunteers and visitors will be held accountable to this Policy and supporting procedures. Partner Organisations are responsible for ensuring their representatives, board members, volunteers and visitors commit to and comply with this Policy.

6. *Promotion of Child Participation and Agency-* AAO and Partner Organisations will work to ensure the inclusion of children's views and opinions in the development of this Policy and in the development and implementation of all program activities that will affect them, their families, and the communities they represent.

5. DEFINITIONS

There are several relevant key terms used in this Policy and applicable in the work of implementing and monitoring this Policy by AAO and all its Partner Organisations. These are defined below.

Word/Term	Definition ⁵
Child/Children	Is defined as any person up to the age of 18 years.
Representatives	Refers to individuals who receive a regular salary for work through AAO as well as individuals paid by or through an AAO entity (if applicable) but located in another entity. Representatives includes contractors, or a range of contracted paid and non-paid individuals who have committed to work with or support AAO. It includes, among others, interns, researchers, and consultants.
Volunteers	Refers to individuals who have committed to work with or support AAO. Volunteers can include specialised volunteers engaged through skills-sharing placements in our international program, and general volunteers engaged through our promotions and events and administration.
Visitors	Refers to a range of persons who are visiting (in limited circumstances) AAO Australia-based or Partner Organisation offices or programs and may come into contact with children and young people, including journalists, photographers/videographers, donors and visiting supporters.
Partner Organisation	Organisations who are party to a Partnership Agreement with AAO.
Child Safeguarding	The actions, policies, and procedures that ensure children grow up in protective environments or circumstances consistent with the provision of safe and effective care.
Child Abuse (includes child harm)	All forms of physical abuse, sexual abuse, emotional ill treatment, neglect, commercial (e.g. for financial gain) or other exploitation that results in actual or potential harm to a child. This includes commission of abuse or other illegal acts in the presence of a child. Harm may be caused by abuse or exploitation whether intended or unintended.

Child Sexual Assault	Sexual abuse is the involvement of a child in sexual activity that he or she does not fully comprehend and by law is unable to give informed consent to, or that violates the laws of society. It includes all forms of sexual violence, including incest, early and forced marriage, rape, involvement in pornography, female genital mutilation, and sexual slavery. Child sexual assault may include indecent touching or exposure, using sexually explicit language towards a child and showing children pornographic material. Sexual exploitation is any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. The sexual exploitation of a child who is under the age of consent is child sexual abuse and a criminal offense.
Neglect	Is the persistent failure or the deliberate denial to provide a child with clean water, food, shelter, sanitation or supervision or care to the extent that the child's health and development are placed at risk.
Exploitation	The use of a child in work or other activities for the benefit of others that are to the detriment of the child's physical and mental health, education, or moral and social-emotional development. It includes, but is not limited to, child labour, child trafficking and child sexual exploitation.
Grooming	Grooming is when an adult builds an emotional connection with a child or an adult responsible for a child to gain their trust for the purposes of gaining access to the child to perpetrate sexual abuse, sexual exploitation, or trafficking.
Working with Children ¹	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. 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.
Contact with Children ²	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. Contact covers contact with children in the community not associated with the work being performed. Examples of contact with children include: • Any international work, in particular working in remote/rural locations. • Oral and written communication (including written communication) relating to a child. • Access to data relating to a person under 18. • Public diplomacy, official functions, visits or other communication activity involving photography, filming, videoing or social media activity where children are present. • Visiting premises e.g. schools, health or residential facilities, that provide

¹ DFAT. Child Protection Guidance Note: Establishing Child Protection Risk Context. (p. 11) November 2021.

² DFAT. Child Protection Guidance Note: Establishing Child Protection Risk Context. (p. 11) November 2021.

	services to children. • Any community consultation (data collection, surveying, training). • Women and gender-focused activities. • Health sector programs.
Child Participation (Agency)	Child participation is the process of supporting children and young people to freely express their views and ensures their right to participate in all matters affecting them. Child agency is defined as being able to make choices and decisions to influence events that have an impact on one's world, further acknowledging that children can initiate their own learning.
Duty of Care	The accepted responsibility of an organisation to provide children with an adequate level of protection and care from all reasonably foreseeable risks of harm.
Reasonable grounds for belief	A belief based on reasonable grounds that child abuse has occurred when all known considerations or facts relevant to the formation of a belief are taken into account and these are objectively assessed. Circumstances or considerations may include the source of the allegation and how it was communicated, the nature of and details of the allegation, and whether there are any other related matters known regarding the alleged perpetrator. A reasonable belief is formed if a reasonable person believes that: (a) the child is in need of protection, (b) the child has suffered or is likely to suffer "significant harm as a result of physical injury," or (c) the parents/caregivers are unable or unwilling to protect the child.
Reporters	Under this Policy, reporters include all AAO board members, representatives, volunteers, and visitors. Reporters are required to inform AAO when they have witnessed, suspected, alleged cases, or have a reasonable belief a child has been harmed or is at risk of harm (reference 'Reporting' page 9).
SEAH	Is an acronym for Sexual Exploitation, Abuse or Harm. <i>(further details on why included in the Child Safeguarding Policy).</i>

6. POLICY IN ACTION

Recruitment of New Personnel

AAO recognises harm to children is more likely to occur in organisations that do not have strong policies and procedures, do not adequately screen, train or supervise personnel, and that work in complex, remote or isolated areas. As such, AAO is committed to child safe recruitment, selection, and screening practices. AAO ensures child safe checks and procedures are followed in the engagement of all AAO representatives, board members, volunteers, and visitors.

For representatives, board members, volunteers **working with children**, AAO requires the following elements to be validated as a component of the recruitment process:

- National police check or use of screening tool such as Fit2Work
- Current Working with Children Check (or state/territory equivalent)
- Behavioural based questions at the interview(s)
- Minimum of three referee checks

For representatives, board members, volunteers, and visitors in **contact with children**, including volunteers and/or visitors to projects, the following checks are required:

- National police check or use of screening tool such as Fit2Work
- Current Working with Children Check (or state/territory equivalent)

In addition to the above, AAO requires volunteers and visitors **working with children** or in **contact with children** to undertake basic components of identified training modules on safeguarding to ensure a comprehensive understanding of the context of safeguarding and their obligations.

Where a visitor does not spend more than incidental time with children as part of their role with AAO, the visitor may not be vetted however they will be accompanied at all times by at least one AAO staff.

All AAO representatives, board members, volunteers and visitors must comply with the procedures set out in the Child Safe and SEAH Allegation Management Standard Operating Procedure (SOP).

All AAO representatives are responsible for reporting a change in their circumstances to AAO management. Examples of changes may include:

- Involvement in criminal activity;
- Criminal or civil court proceedings relating to child exploitation and abuse.

AAO management will consider an appropriate response to a change in circumstances on a case-by-case basis and by the appropriate person, e.g., as per the Performance Counselling and Disciplinary Policy and related procedures. Members of AAO's Safeguarding Committee may need to be involved in the review process and decide on the appropriate response. Further information regarding the formation and operation of the Safeguarding Committee is included in the Child Safe and SEAH Allegation Management SOP.

Partner Organisations must implement screening procedures to promote child safety in their recruitment of personnel who will be working with children in delivery of AAO-funded programs.

Risk Management Approach

Risk management is an essential and ongoing activity in reducing the risks of harm to children and young people involved in AAO's programs. Our risk management approach includes the following requirements:

- The AAO Safeguarding Committee undertakes an annual review of the developed Child Safeguarding Risk Management (CSRM) matrix to ensure ongoing evaluation of risks and impacts to children involved in AAO funded programs and will draw on guidance and supporting tools from the Risk Management Toolkit.
- AAO and Partner Organisations must conduct child safeguarding risk assessments on all AAO-funded activities that have potential contact with children, impact on children, work with children and/or access to children's personal information.
- Partner Organisations must develop and undertake annual reviews of Program Wide Risk Assessments (PWRA), Child-Led Risk Assessments (CLRA) and/or other required risk assessments as applicable to their program profile. These assessments will be used to monitor progress towards addressing more complex and serious risks, ensuring immediate action is taken to address risks identified as highly probable and with more serious consequences.
- Partner Organisations must report progress towards addressing potential risks (and in the case of incidents) to AAO representatives and board members through scheduled child safeguarding reports. These reports must also capture activities of volunteers, where such activities include contact with children, impact on children, work with children and/or access to children's personal information.

Responsibilities

We are all responsible for the care and safeguarding of children and young people. Nevertheless, AAO recognises, in practice, the board of AAO has ultimate responsibility for the detection and prevention of child abuse and is responsible for ensuring appropriate and effective internal control systems are in place. This includes implementing this Policy and associated policies, procedures, AAO's Code of Conduct and Child Safe Code of Conduct and the regular review of strategies and receiving of reports.

A component of the Board responsibility and its various delegations is to provide an accessible mechanism and be responsive to complaints, allegations, and/or incident reports received. AAO has an accessible process for managing complaints, allegations, and/or incidents as detailed through the company website and the relevant policies.

In support of ensuring safeguarding measures are enacted at the governance and leadership level of AAO, the **CEO of AAO** is responsible for:

- dealing with and investigating reports and incidents of child abuse within AAO's programs (both in the domestic and international contexts) in line with local and international legislation;
- ensuring all representatives, volunteers and visitors are aware of the relevant laws, AAO policies and procedures, and AAO's Code of Conduct and Child Safe Code of Conduct, and their obligations to comply with these;
- providing support and training for representatives, volunteers, and visitors in undertaking their child safeguarding responsibilities; and
- managing enquiries, including from the media, relating to suspected child abuse.

In support of ensuring safeguarding measures are enacted at the programming level of AAO, all **department managers** must ensure they:

- promote child safety at all times;
- assess the risk of child abuse within their area of control and eradicate or minimise any risk to the extent possible;
- educate AAO representatives, volunteers, and visitors under their supervision about the prevention and detection of child abuse (both in domestic and international contexts where/if relevant);
- facilitate a culture of supporting children and valuing children's opinions;
- ensure new representatives and volunteers in their team are properly screened in accordance with the child safeguarding procedures, have valid checks as required prior to commencing any interaction with children, and receive the required staff induction as it relates to child safety; and
- facilitate the reporting of any inappropriate behaviour or suspected abusive activities within their program area of control (both in the domestic and international contexts where/if relevant).

Management must be familiar with the types of abuse that might occur within their area of responsibility and be alert for any indications of such conduct.

All AAO **representatives**, **board members**, and **volunteers** share the responsibility for preventing and detecting child abuse, and must:

- familiarise themselves with the relevant laws, AAO's Code of Conduct and Child Safe Code of Conduct and AAO's policy and procedures in relation to child safeguarding and prevention of sexual exploitation, abuse, and harassment, and comply with all requirements;
- fully cooperate with the relevant national, state and territory child protection authority or police department in their investigation of suspected child abuse and any internal investigation by AAO;
- report any reasonable belief that a child's safety is at risk to the relevant authorities (such as the police and/or the state-based child protection service) and fulfil their obligations as mandatory reporters (where/if relevant);
- complete all compulsory training and development;
- value and respect the opinions of children and empower them to raise concerns;
- comply with all reasonable directions by AAO;
- immediately notify their supervisor if they are charged or convicted of an offence that might affect their Working with Children Check (WWCC) or state/territory-based equivalent or police check, or if they are aware that their relevant check might expire, be revoked or be at risk of being revoked;
- report any suspicion that a child's safety may be at risk to their supervisor (or, if their supervisor is involved in the suspicion, to a responsible person in the organisation); and
- promote an environment that is supportive of all children's emotional and physical safety in the course of their work.

In adherence to the safeguarding standards outlined in this Policy, the supporting Code of Conduct and Child Safe Code of Conduct, and AAO's partnership standards, all **Partner Organisations** must:

- develop and abide by their own child safeguarding policies and guidelines that reflect AAO's, ensuring these are regularly reviewed and updated;
- provide all implementing partner personnel, children and young people associated with programs and projects partially or fully funded by AAO with clear, age-appropriate, and legally coherent guidance on child safeguarding policies and laws;
- provide all implementing partner personnel, children and their caregivers associated with programs and projects partially or fully funded by AAO with written and verbal instructions on how to report suspected instances of child abuse and/or exploitation;
- empower children's agency to actively contribute to the development of child safeguarding measures within partner organisations' program design and delivery, and across AAO's programs; and
- ensure the requirements outlined above are included in agreements between the Partner Organisation and any other organisations (including contractors or consultants) with whom the Partner Organisation collaborates to deliver AAO programs.

Reporting

AAO's Code of Conduct, the Child Safe Code of Conduct and Child Safe and SEAH Allegation Management SOP outline the specific responsibilities shared by Reporters linked to AAO's programs. Reporters include all AAO board members, representatives, volunteers, and visitors. Reporters must immediately (within 24 hours) inform AAO in accordance with the Child Safe and SEAH Allegation Management SOP when they have witnessed, suspected, alleged cases, or have a reasonable belief a child has been harmed or is at risk of harm, when:

- it is due to the actions of board members and/or representatives;
- it involves volunteers and/or visitors; and/or
- it is due to the actions of partner organisation personnel, or contractors/consultants engaged on behalf of a partner organisation.

Examples of a reasonable belief of a concern and incident that must be reported include:

- an observation or disclosure of harm (by an adult or child) of actual harm or abuse to a child;
- a suggestion or indication of potential harm or abuse to a child;
- a breach of this Policy, the Code of Conduct, the Child Safe Code of Conduct, or supporting Child Safe and SEAH Allegation Management SOP;
- a breach of the behavioural guidelines for representative, volunteer/visitor trips;
- you are aware an individual involved with AAO, or a Partner Organisation has abused a child outside of work (a family member, domestic worker or through prostitution); and
- a child unconnected to AAO programs approaches an AAO board member, representative or partner organisation personnel for help with an issue of abuse or exploitation.

All concerns, allegations, or incidents of harm to a child should be made using directions provided in the supporting Child Safe and SEAH Allegation Management SOP and reporting facilities through the AAO website. The Child Safe and SEAH Allegation Management SOP is to be made available to all parties within the scope of this Policy, be accessible in a confidential manner both via the AAO website, email and in print form and can be emailed to a generic AAO-hosted email address to mitigate the risk of the subject matter of an allegation being revealed to any party.

Where safe to do so, where required by law and/or when in accordance with the wishes of the complainant(s) and/or whistleblower(s), ***all alleged allegations involving a criminal aspect must also be reported through the appropriate local law enforcement channels.*** Refer to the Child Safe and SEAH Allegation Flowchart (Appendix 1, domestic and international) and Complaints Handling Procedure Flowchart (Appendix 2) for further information on how complaints and allegation reports are received and managed by AAO.

Partner Organisation Reporting

In line with Partnership Agreements and according to their respective child safeguarding policies, Partner Organisation Directors and assigned child safeguarding personnel agree to immediately (within 24 hours) inform AAO when they have witnessed, suspected, alleged cases, or have a reasonable belief that a child has been harmed or is at risk of harm, when:

- it is due to the actions of AAO board members and/or representatives;
- it involves AAO volunteers and/or visitors;
- it is due to the actions of Partner Organisation personnel, or contractors/consultants engaged on behalf of a partner organisation.

In the context of Partner Organisations working through the Seventh-day Adventist church, Partner Organisation Directors and assigned child safeguarding personnel must also immediately (within 24 hours) inform AAO when they have witnessed, suspected, alleged cases, or have a reasonable belief that a child has been harmed or is at risk of harm, when it is due to the actions of partner Adventist school personnel and/or associated church employees.

Refer to page 8 above for examples of concerns and incidents that must be raised. In the case of incidents, The Partner Organisation child safeguarding personnel must provide reports in accordance with the Child Safe and SEAH Allegation Management SOP to:

- AAO CEO;
- AAO Program Manager;
- Relevant Partner Organisation Director; and
- Relevant in-country child protection service and/or local law enforcement.

Marketing, Fundraising and Public Relations

AAO is committed to upholding the United Nations Convention on the Rights of the Child (UNCRC) which requires children to be protected from unlawful interference with their privacy, family, home, or correspondence, including unlawful attacks on a child's honour and reputation. As the largest funding mechanism of AAO's program is currently child sponsorship, AAO has access to personal information, images, stories, and video footage of children, their families, and their communities. AAO recognises our responsibility to protect this material, stored both in hard and electronic copy, and has put systems in place to limit access to this

material in order to prevent harm to or exploitation of the children represented in the material in accordance with the AAO Privacy Policy and Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy. Procedural guidelines for the use of images both in online and written publications, facilitation of project site visits and management of sponsorship material are included in the AAO Ethical Communications Policy and supporting procedures.

AAO manages sensitive information we hold about children with whom we work in a manner that is respectful, professional and that complies with the applicable national, local, and international laws. AAO representatives who receive sensitive and/or personal information must keep all information about any suspected or reported incidents strictly private and secure and must only disclose that information to a local or national child safeguarding body, relevant human resource personnel and any other senior representatives directly involved in the investigation as required by the applicable safeguarding procedure or applicable law. Information about a child's disclosure of harm, or an investigation into suspected child abuse, when shared with inappropriate people, can increase the risk the child may experience harm.

Codes of Conduct

AAO's Code of Conduct and Child Safe Code of Conduct outline acceptable and unacceptable behaviour in relation to children. All AAO representatives, board members, volunteers and visitors must acknowledge understanding of this Policy, sign both the Code of Conduct and the Child Safe Code of Conduct, and agree to comply with the guiding principles, safeguarding standards, and behavioural expectations they contain.

7. POLICY BREACH

Breaches of this Policy, the Code of Conduct and/or the Child Safe Code of Conduct will be investigated by the appointed AAO Safeguarding Manager and AAO CEO in accordance with disciplinary procedures and contractual agreements (i.e., partnership agreements and employment agreements), or a referral may be made to the relevant local statutory authorities for criminal investigation. Breaches may incur sanctions including disciplinary action leading to possible dismissal, termination of all relations including contractual and partnership agreements, and where relevant, appropriate legal or other such actions. Sanctions to be determined by the AAO CEO.

The following measures may be applied to any person (board members, representatives, volunteers, Partner Organisation Directors and child safeguarding personnel, or visitors) who is alleged to have breached this Policy, AAO's Code of Conduct and/or the Child Safe Code of Conduct:

- meeting with the AAO Safeguarding Committee to discuss breach and opportunity for person to provide their account/understanding of the situation;
- following formal warning, the AAO Safeguarding Committee with support of AAO management to provide increased supervision, compulsory refresher training (including further education on this Policy, the Code of Conduct, and the Child Safe Code of Conduct), and/or adjustment to duties;
- internal investigation by the AAO Safeguarding Committee, with support from local police;
- alleged perpetrator stood down on full pay pending results of the investigation and distanced from children, young people and the AAO or Partner Organisation office workplace and/or project location(s);
- if allegations are confirmed, AAO to sever all ties with the perpetrator, resulting in termination of employment or engagement.

Notwithstanding the above, AAO has full discretion to:

- put in place safety management plans or take disciplinary action where it forms a reasonable belief that it is not safe for a board member, representative, volunteer, or visitor to interact with children;
- undertake an internal investigation, with legal assistance or an independent investigator if required; and/or
- immediately terminate its engagement with an individual for significant or repeated breaches of this Policy, AAO's Code of Conduct, the Child Safe Code of Conduct or where AAO believes there is an unacceptable health and safety risk.

All AAO representatives, board members, volunteers, visitors, and Partner Organisations must cooperate fully with an investigation, maintain confidentiality, and comply with directions from AAO.

AAO commits to provide victims of a policy breach with support and counselling in a survivor-centred approach (where applicable including trauma-informed care). If a legitimate concern about the suspected abuse of a child is raised but proves to be unsubstantiated on investigation, no action will be taken against the reporter. However, appropriate sanctions will be placed in cases of intentionally false and malicious accusations.

AAO CEO will take disciplinary action, including up to termination of employment or engagement based on the disciplinary findings, against any person:

- who fails to report a reasonable belief of a child safeguarding incident/concern;
- who makes an intentionally false or malicious allegation;
- who intentionally misleads an investigation; or
- whose behaviour breaches this Policy, AAO's Code of Conduct and/or the Child Safe Code of Conduct.

Due to the nature and scope of AAO's program, this policy must be read in conjunction with the relevant international conventions and obligations, the law of the Commonwealth or of the relevant state or territory within Australia (see Appendix I and related AAO documents linked to this Policy).

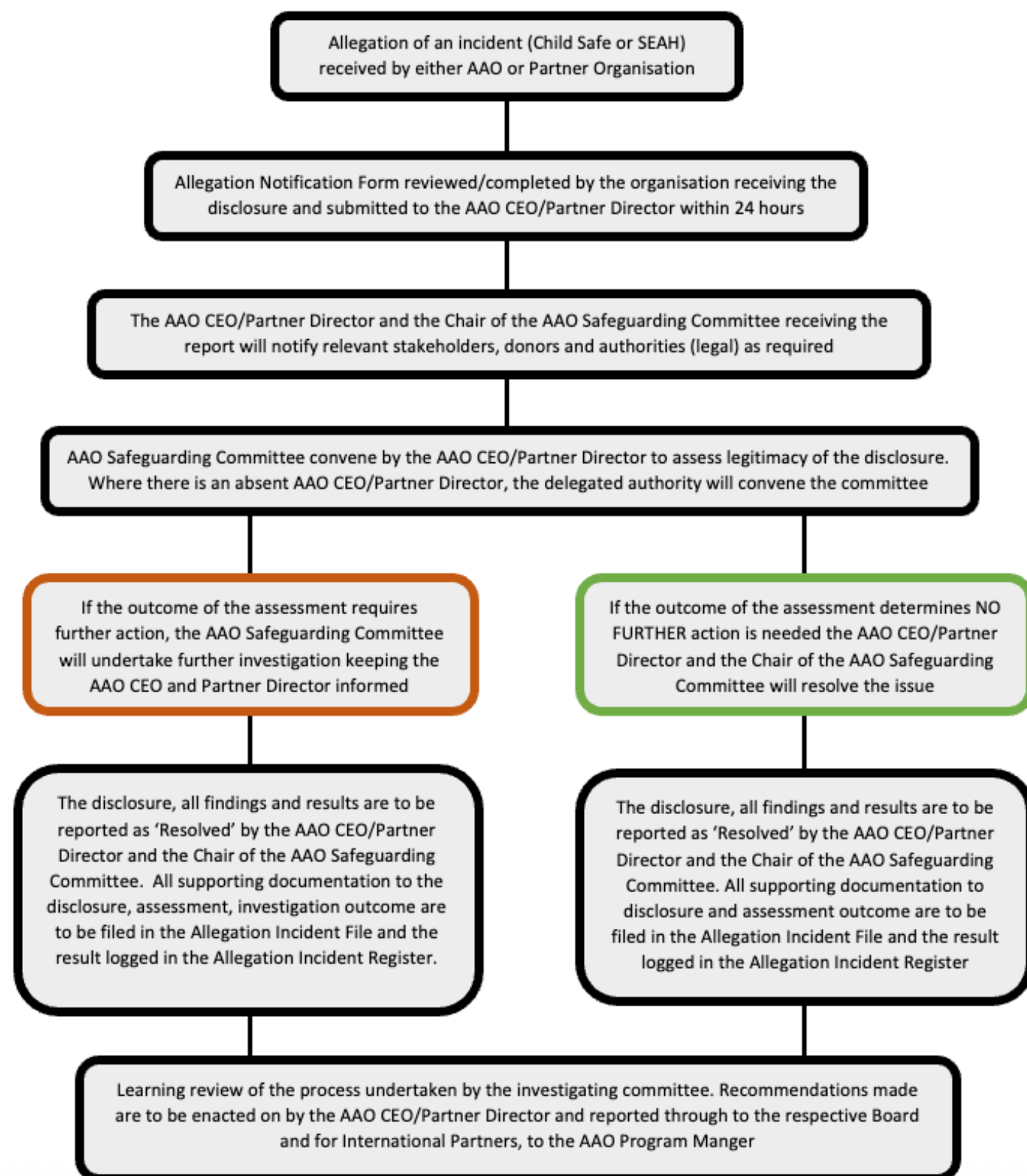
Policy Amendment Table

Version #	Date	Short description of amendment	Approved by:
2	28/05/2021	Updated format; table of amendments included; minor edits to include the new SOP for CS and SEAH; inclusion - policy code, responsible officer and office, related documents internal and external	CEO/Board
3	01/05/2024	Broadened scope of work, under 'Purpose' removed requirement for children to be aware of AAO's commitment to prevent and address cases of abuse (page 3); section '4. 'Guiding Principles' reworded to incorporate an active requirement for AAO and Partner Organisations to comply with the listed principles; definition for 'Partner Organisation' revised; inclusion of definition for 'Reporters', definition now incorporates volunteers and visitors; under 'Reporting' phrase mandatory reporter removed, noting specific (and different) legal meanings in Australia, instead listed reporters must report as per the Policy.	CEO/Board
4	18/06/2025	Inclusion of definitions for 'working with children' and 'contact with children' including recruitment procedure elements to be vetted/provided by volunteers and visitors; inclusion of appendices for allegation flowchart, complaints handling procedure flowchart, and external reporting jurisdictions table.	CEO/Board

APPENDIX I:

Allegation Flowchart (International and Domestic)

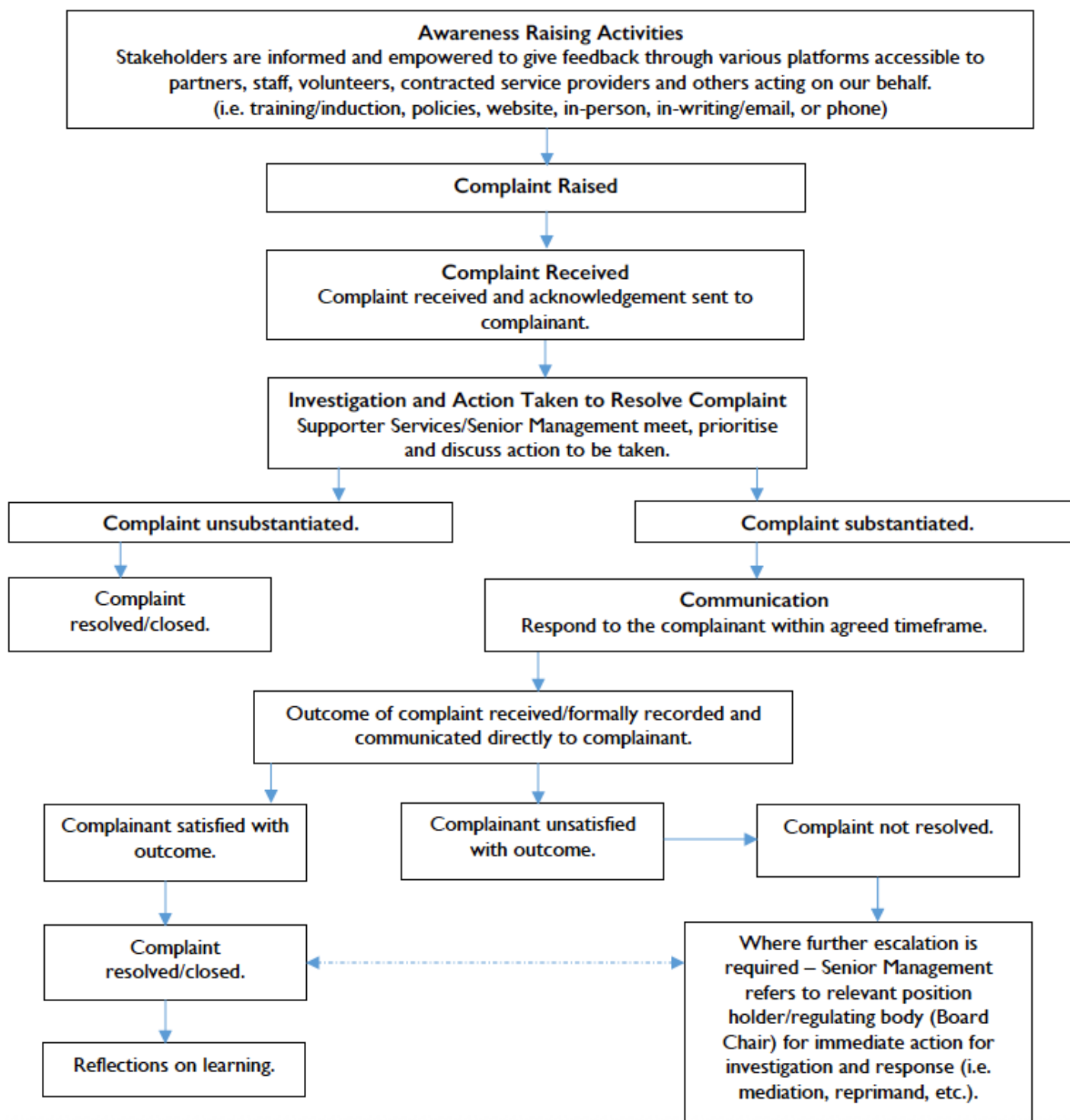
The following flowchart is for quick reference to the Standard Operating Procedure (SOP) for Child Safe and Sexual Exploitation, Abuse, and Harassment (SEAH) Allegation Management by AAO and AAO partner organisations. Refer to the full SOP for detailed steps to follow in the event of a child safe or SEAH disclosure.



APPENDIX 2:

Complaints Handling Procedure Flowchart

The following flowchart is an illustration of how stakeholder complaints and/or feedback are received and addressed through internal processes at AAO, as detailed in the AAO Complaints Handling Policy.



APPENDIX 3:

External Reporting – Jurisdictions*

State	Office	Child Protection Authorities
New South Wales	Office of the Children's Guardian	Department of Family and Community Services
Victoria	Commission for Children and Young People in VIC	Department of Health and Human Services
Queensland	Queensland Family and Child Commission	Department of Child Safety, Youth and Women
Western Australia	Commission for Children and Young People - WA	Department of Communities, Child Protection and Family Support
Australian Capital Territory	Public Advocate and Children and Young People Commissioner	Community Services Directorate
South Australia	Commission for Children and Young People in - SA	Department for Child Protection
Tasmania	Commission for Children and Young People - TAS	Department of Health and Human Services
Northern Territory	Office of the Children's Commissioner - NT	Territory Families

*Source of information: <https://www.ncca.org.au/national-child-safety-framework/state-bodies>

Any person (aged 18 or over) that forms a belief, on reasonable grounds, that a sexual offence has been committed in Victoria against a child (under the age of 16 years) by another person (aged 18 or older), must make a report to the Police as soon as practicable.

Any person that knows that there is a substantial risk that a relevant child will become the victim of a sexual offence committed by another adult associated with Asian Aid must not negligently fail to reduce or remove that risk. Reporting to the relevant authority and / or Police is one way to reduce or remove that risk.

NB: additional voluntary or mandatory reporting obligations may apply in each state or territory and may impose additional obligations on Representatives. For more information contact the Asian Aid Safeguarding Manager.

The AAO CEO must make a report to the Office of the Children's Guardian in NSW or the Commission for Children and Young People in VIC (Commission) if there is a reportable allegation under the applicable Reportable Conduct Schemes.

Any person may disclose a reportable allegation to those Commissions if operating in those jurisdictions.

NB: There are specific timeframes by which the CEO must abide by when making a report to the Commission (i.e. in Victoria it is within 3 business days of receiving a disclosure and forming a reasonable belief the conduct is reportable. In NSW this is 7 business days).

APPENDIX 4:

International Conventions and Obligations

The United Nations Convention on the Rights of the Child (UNCRC) 1989	The United Nations Convention on the Rights of the Child (UNCRC) is a human rights treaty which sets out the civil, political, economic, social, health and cultural rights of children. Australia ratified the UNCRC in December 1990, which means that Australia has a duty to ensure that all children in Australia enjoy the rights set out in the treaty. https://www.unicef.org.au/Upload/UNICEF/Media/Our%20work/childfriendlycsrc.pdf
Sustainable Development Goals and Targets	The Sustainable Development Goals (SDGs) are a collection of 17 global goals set by the United Nations General Assembly in 2015 to be achieved by the year 2030. The goals are a universal call to action to end poverty, protect the planet and ensure that all people enjoy peace and prosperity. AAO's program is currently contributing towards the achievement of the following SDGs: 1- No poverty 3- Good Health and Well-being 4- Quality Education 5- Gender Equality 11- Sustainable Cities and Communities 16- Peace and Justice Strong Institutions https://sustainabledevelopment.un.org
Department of Foreign Affairs and Trade (DFAT) Child Protection Policy 2017 and Guidance Notes	The Australian Government's Policy is part of DFAT's child protection framework and in collaboration with funded partners it aims to prevent child exploitation and abuse in the delivery of the international aid program. To assess AAO's compliance and program delivery against best practice, AAO has aligned this Child Safeguarding Policy to reflect the DFAT Child Protection Policy 2017 and supporting guidance notes. In 2019. https://dfat.gov.au/international-relations/themes/child-protection/Pages/child-protection.aspx
ACFID Code of Conduct (2023 revisions)	The Code is underpinned by a set of values which inform the behaviours of all ACFID Members in the course of their work. The values are translated into high-level Quality Principles that are then translated into specific Commitments and associated Compliance Indicators. AAO has aligned this Child Safeguarding Policy with ACFID's guidelines for safeguarding policy development, and associated Code revisions and compliance indicators. https://acfid.asn.au/code-of-conduct
ACNC Governance Standards	As a registered charity, AAO is required to comply with the five ACNC Governance Standards. The Governance Standards are a set of core, minimum standards that outline how charities are to run (processes, activities, and relationships etc.). AAO has aligned this Child Safeguarding Policy with the Governance Standards.
ACNC External Conduct Standards	The four External Conduct Standards (ECS) came into effect on 23 July 2019 and apply to all ACNC registered charities that are operating outside Australia or working with third parties operating outside of Australia. The ECS require AAO to take reasonable steps to ensure appropriate standards of behaviour, governance and oversight when undertaking its activities or providing funding overseas. AAO has aligned this Child Safeguarding Policy with the ECS.

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