

Child Protection Policy

Introduction

The principles described in this policy are drawn from the [Department of Foreign Affairs and Trade \(DFAT\) Child Protection Policy 2017](#), being the latest version, as at March 2022.

The aim of this policy is to promote the safety and well-being of all children and articulate the Crawford Fund's zero tolerance of child exploitation and abuse. Although the Crawford Fund training activities do not involve children, it is the Crawford Fund's policy to ensure that people associated with the Crawford Fund are aware of its Child Protection Policy. As an organisation that works in developing countries with vulnerable communities and children, the Crawford Fund has a strong commitment to child protection as part of its broader commitment to human rights and anti-discrimination.

It is noted that the Crawford Fund works with DFAT funded partners such as Australian Volunteers Program (AVP). DFAT funded partners such as AVP are required to develop and implement a child protection policy and implement child protection practices. The child protection approach applies to all personnel, volunteers, partner organisations and subcontractors who are engaged by the managing contractor under the Australian Volunteers program.

Scope of the policy

This policy sets out Crawford Fund's principles, obligations, standards, and procedures to protect and safeguard children against all forms of child exploitation and abuse. It includes professional behaviours/code of conduct to follow for all Crawford Fund personnel who may have interactions with children through the course of their engagement.

This policy is for program staff, management and all other personnel including mentors and volunteers. It is to assist in managing and reducing the risks of child exploitation by persons engaged in Crawford Fund's programs and activities both in Australia and overseas.

This policy is based on [DFAT's Child Protection Policy 2017](#) and the Crawford Fund's policy requires adherence to DFAT's Child Protection Policy 2017 minimum child protection standards (reproduced in Attachment A). In the absence of information in this Crawford Fund Child Protection Policy, it will be assumed DFAT's Child Protection Policy 2017 will apply.

Guiding principles

The Crawford Fund's child protection policy is guided by the principles as outlined in [DFAT's Child Protection Policy 2017](#):

- Zero tolerance of child abuse - Crawford Fund has zero tolerance to child exploitation and abuse
- Recognition of children's interests - Australia is a signatory to the United Nations Convention on the Rights of the Child. The Crawford Fund is committed to upholding the rights of the child and Australia's obligations under this convention. In all actions concerning children, the best interests of the child shall be a primary consideration

- Sharing responsibility for child protection - the Crawford Fund requires the active support and cooperation of contractors for Crawford Fund-funded aid activities. Contractors must be aware of the child protection policy. The Policy is available at the Crawford Fund website.

Approach

The Crawford Fund's Child Protection Policy is in line with DFAT's Child Protection Policy and provides a risk-based approach. If a project is assessed as involving potential contact with children, impact on children or working with children, an assessment of child protection risk must be conducted. Relevant risk and decision-making processes and documents must reflect this assessment and can be incorporated into existing planning and risk management processes. CF training/project managers are to ensure all personnel working on the training/project are aware of the Crawford Fund's Child Protection Policy and its requirements. This is to ensure that all funded partners understand and act on their obligations to manage risks to children.

Professional Behaviours - Code of Conduct

Based on [DFAT's Child Protection Policy 2017](#), contractors working on behalf of the Crawford Fund will adhere to the following professional behaviours:

- treat all children with respect
- not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate
- not engage children under the age of 18¹ in any form of sexual intercourse² or sexual activity,³ including paying for sexual services
- wherever possible, ensure that another adult is present when working near children
- not invite unaccompanied children into private residences, unless they are at immediate risk of injury or in physical danger
- not sleep close to unsupervised children unless absolutely necessary, in which case the supervisor's permission must be obtained, and ensuring that another adult is present if possible (noting that this does not apply to an individual's own children)
- never use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material through any medium
- not use physical punishment on children
- not hire children for domestic or other labour: which is inappropriate given their age or developmental stage; which interferes with their time available for education and recreational activities; or which places them at significant risk of injury
- comply with all relevant Australian and local legislation, including labour laws in relation to child labour
- immediately report concerns or allegations of child exploitation and abuse and policy non-compliance in accordance with appropriate procedures
- immediately disclose all charges, convictions and other outcomes of an offence that relates to child exploitation and abuse, including those under traditional law, which occurred before or occurs during association with DFAT
- be aware of behaviour and avoid actions or behaviours that could be perceived by others as child exploitation and abuse

¹ Where the child is 16 years or older and the other party is not more than 2 years older; and it can be established that the child consented to the relationship, an exception can be recorded promptly on personnel files.

² As defined under the *Criminal Code Act 1995*.

³ As defined under the *Criminal Code Act 1995*.

Use of children's images for work related purposes

When photographing or filming a child for work related purposes, they will:

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

The onus is on the person engaged to use common sense and avoid actions or behaviours that could be construed as child abuse when implementing Crawford Fund funded activities.

Responsibilities and Reporting

Any suspicion or disclosure of child abuse and exploitation must be reported immediately through to the Crawford Fund Central Office and DFAT on childwelfare@dfat.gov.au. You must report any behaviour that is suspected of being child exploitation or abuse (including possession of child exploitation material) or policy non-compliance. Where an individual or organisation has already reported, but becomes aware of additional information, the individual or organisation must also report that information.

Further Information

Further information is available via DFAT:

Email: childprotection@dfat.gov.au
Telephone: +61 2 6178 5100
Web: www.dfat.gov.au/childprotection

Legislation relevant to child protection

There are a range of laws including Australian Commonwealth, state and territory laws and local laws in the overseas countries in relation to child protection. A number of international child protection instruments also apply. These can be found within [DFAT's Child Protection Policy 2017](#)

Minimum Child Protection Standards

Requirement	Minimum standard	Minimum standard – evidence	Why is this required?	What is the risk without it?
Having a Child Protection Policy and reporting procedure in place	<p>1.</p> <p>Partners</p> <p>The organisation has a child protection policy that applies to all personnel, partner’s downstream personnel and subcontractors that are engaged by the organisation to perform any part of a DFAT funded activity.</p> <p>The managing partner must ensure the downstream organisation or individual subcontractor complies with the relevant minimum child protection standards.</p> <p>Individuals</p> <p>An individual contractor is not required to have a child protection policy. However, they will be required to sign a code of conduct that applies and builds on where appropriate DFAT’s Child Protection Professional Behaviours and provide evidence of their commitment to child protection.</p>	<p>Partners</p> <ul style="list-style-type: none"> - Child protection policy in place - Personnel aware of the organisation’s child protection policy (e.g. through internal communication and training) - Documented plan for ensuring downstream DFAT funded partners are meeting the minimum standards - Initial risk assessment of organisation and activities to inform policy development <p>Individuals</p> <ul style="list-style-type: none"> Attend child protection training Sign code of conduct Commitment to child protection Current Criminal Record Check 	<p>A child protection policy provides clear guidance and demonstrates how the organisation, across its operations, will ensure that children are protected from child exploitation and abuse in the delivery of DFAT funded programs.</p>	<p>An organisation is unaware of the risks to children within their organisation and the activities they manage and/or implement.</p> <p>Having a sub-contractor sign up to a code of conduct as the only control does not provide sufficient contractual effect to address child protection issues.</p>

Requirement	Minimum standard	Minimum standard – evidence	Why is this required?	What is the risk without it?
	<p>2.</p> <p>The organisation’s child protection policy includes a documented reporting procedure for child exploitation and abuse allegations, code of conduct and policy non-compliance, including available sanctions for breaches.</p>	<ul style="list-style-type: none"> - Organisation’s guidelines for managing concerns or allegations of child exploitation and abuse, and policy non-compliance - Documentary evidence that personnel can raise concerns about a child’s safety or well-being or unacceptable behaviour by personnel - Documentary evidence outlining the organisation’s details of available sanctions - Documentary evidence that policy and reporting information is publically available and accessible to community members 	<p>An effective child protection policy requires a report handling procedure.</p> <p>One of the biggest hurdles to personnel reporting child exploitation and abuse is that there is no formal system in place to do so, or that personnel or community members are not aware of a formal system to report concerns or allegations.</p> <p>Reporting systems must respect the rights of both the alleged victim and the alleged offender.</p>	<p>Personnel are unaware how to report concerning behaviour.</p> <p>Community members are unaware how to report concerning behaviour.</p>

Requirement	Minimum standard	Minimum standard – evidence	Why is this required?	What is the risk without it?
	<p>3.</p> <p>The organisation provides child protection training for personnel, including downstream partners.</p>	<ul style="list-style-type: none"> - Training attendance records - Training agendas and timeframes for training - Materials used in training 	<p>Personnel must be fully aware of their responsibilities to protect children and how to report concerns or allegations about child exploitation and abuse.</p>	<p>Personnel are unaware of behaviour that would arouse concern.</p> <p>Personnel are unaware of how to build child protection practices into their work.</p> <p>Personnel do not know how to report concerning behaviour.</p>
	<p>4.</p> <p>The organisation’s child protection policy includes a commitment to preventing a person from working with children if they pose an unacceptable risk to children.</p>	<ul style="list-style-type: none"> - Referenced in relevant documentation, including policies, contracts and human resource guidelines 	<p>The organisation, as an employer, must have clear grounds to determine whether a person is the most appropriate to work with children.</p>	<p>A lack of leadership and governance and the right culture undermine personnel efforts to implement a child protection environment.</p>
	<p>5.</p> <p>The organisation’s child protection policy is subject to regular review, at least every five years or earlier if needed.</p>	<ul style="list-style-type: none"> - Policy is subject to regular review in accordance to the policy commitment, or at least every five years 	<p>Contexts change, particularly in the development sector. There must be a commitment to review and update the policy as required.</p>	<p>Lessons learned from previous incidents are not taken into account, increasing the likelihood that those risks will be repeated.</p>

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Undertaking assessment and management of risk	<p>6.</p> <p>The organisation undertakes a risk assessment to reduce the risk of any child being harmed as a result of operations or activities funded by DFAT. The assessment must identify risks, and document steps being taken to reduce or remove these risks.</p>	<ul style="list-style-type: none"> - Risk plan identifying activities and measures to reduce or remove the risk to children - Documentation that risk assessments are reviewed and updated regularly during the life of the activity - Evidence of adaption to local context (when a different approach to standard risk controls is required) 	Some activities are higher risk than others. This may be due to the nature of the activity or the location. For example, working with children with disability or in an emergency situation involve higher risks.	Risks to children are missed during activity design and implementation.
Recruitment and screening, and employment practices in place	<p>7.</p> <p>The organisation’s employment contracts contain provisions for suspension or transfer to other duties of any employee who is under investigation and provisions to dismiss any employee after an investigation.</p>	<ul style="list-style-type: none"> - Employment contracts for personnel/consultants contain appropriate provisions 	Robust recruitment, screening and employment practices reinforce the importance of the organisation’s child protection policy to personnel.	Personnel that pose unacceptable risks to children are unable to be removed (suspended, transferred or terminated) without a criminal conviction.
	<p>8.</p> <p>Contact with children positions</p>	<ul style="list-style-type: none"> - Documented criminal record checks for personnel in contact with children 	Child-safe recruitment and screening processes	Your organisation may be targeted by adults

Requirement	Minimum standard	Minimum standard – evidence	Why is this required?	What is the risk without it?
	<p>The organisation has robust recruitment screening processes for all personnel in contact with children. These recruitment procedures include:</p> <ul style="list-style-type: none"> - criminal record checks before engagement - verbal referee checks <p>Working with children positions Additional screening measures (such as interview plans that incorporate behavioural-based interview questions) must be used when candidates are applying for positions that involve working with children.</p>	<ul style="list-style-type: none"> - Documented verbal referee checks - Documented request for an applicant to disclose whether they have been charged with child exploitation offences, and their response - Interview plans incorporating behavioural-based interview questions that are specific to positions that involve working with children - Review checks when personnel have a change in circumstances - In limited circumstances it may prove impossible to obtain a reliable criminal record check. A statutory declaration, or local legal equivalent, outlining efforts made to obtain a foreign police check, and disclosing any charges and spent convictions related to child exploitation, may be accepted instead - Checks must be conducted for each country in which the individual has lived for 12 months or longer over the last 5 years, and for the individual’s countries of citizenship 	<p>are essential to enable an organisation to choose the most appropriate person for a position that involves contact with children.</p> <p>Recruitment and selection can prevent access to children by those with a known history of harming children.</p> <p>Child safe recruitment and selection processes can discourage individuals who pose an unacceptable risk to children from applying for positions.</p>	<p>who wish to harm children (due to weak recruitment and screening practices) A person who poses an unacceptable risk of harm to children (as indicated by their background) is unknowingly appointed to a position within the organisation.</p>
	<p>9. The organisation has a child protection code of conduct that meets and – builds on (where</p>	<ul style="list-style-type: none"> - A risk based child protection code of conduct based on DFAT’s Child Protection – Professional Behaviours - Signed codes of conduct or a register 	<p>A code of conduct makes clear the organisation’s standards for acceptable and unacceptable behaviour in relation to</p>	<p>Lack of clear, well-advertised rules allows concerning behaviour to go unchallenged.</p>

Requirement	Minimum standard	Minimum standard – evidence	Why is this required?	What is the risk without it?
	<p>appropriate) – the minimum standard set by DFAT (see Attachment B – DFAT’s Child Protection –Professional Behaviours).</p>	<p>documenting details of personnel who have signed the code of conduct, or inclusion in employment contracts</p> <ul style="list-style-type: none"> - Signed image consent forms/ verbal consent file notes 	<p>children, including use of images and must be signed by all personnel.</p> <p>It protects personnel by providing guidance on how to avoid situations that may be perceived as harmful to children.</p> <p>It also provides employers with a sound basis on which to conduct disciplinary action.</p>	<p>Identification of a child and/or their whereabouts.</p>