

# Child Safe Policy

## Policy Statement

Transform Aid International's (TAI) vision of a world free from poverty where all people live in the fullness of life God intends cannot be achieved unless all children are free from exploitation and abuse. Children worldwide face significant risks, including physical, emotional, and sexual abuse, neglect, and the compounded effects of poverty, conflict, disasters, and unequal access to services. Emergencies further heighten these risks, and TAI's response projects follow international child protection standards.

TAI acknowledges that a human rights approach to child protection nurtures the dignity of children; rejecting the notion that children are of intrinsically lower status than adults. Child abuse is a serious violation of children's rights and protecting children from all forms of abuse is a human rights imperative. TAI will consider the best interests of the child in all operations concerning children.

## Scope

This Policy applies to our people including employees, volunteers and all TAI representatives and operations, whether in Australia or overseas.

Aspects of this policy apply additionally to third parties including: implementing Partners and downstream partners, project participants, supporters of TAI and its subsidiaries, and participants in events or trips facilitated by TAI or its subsidiaries. Where this is the case, these parties are specified in the relevant section below.

## Policy Objectives

The objective of this policy is to create and maintain protective environments for children in the delivery of TAI activities or TAI funded activities.

This policy is guided by the following principles that have been informed by the DFAT Child Protection Policy.

### Principle 1: Zero tolerance for child exploitation, abuse and harm

TAI does not tolerate child exploitation and abuse. 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. Such action attracts criminal, civil and disciplinary actions up to and including termination of employment. TAI works to reduce the risks of child exploitation and abuse associated with delivering TAI or TAI funded activities including training TAI representatives on their obligations. TAI will not knowingly engage anyone who poses a risk to children or partner with any organisation that does not meet TAI's child safeguarding standards.

## **Principle 2: Prioritise the best interests of the child.**

In all actions concerning children, the best interests of the child (including adolescents) shall be the primary consideration. Responses to address child exploitation and abuse should be guided by a “do no harm” approach prioritising the rights, needs, wishes and best interests of the child victim-survivor. This approach treats the child victim-survivor with dignity and respect; involves the child victim-survivor in age-appropriate decision making; provides the child victim-survivor with age-appropriate information; protects privacy and confidentiality; considers the need for support to assist the child victim-survivor with their recovery and takes a trauma-informed approach to avoid further traumatising or re-traumatising the child victim-survivor

## **Principle 3: Promote inclusion and equity and recognise diversity**

TAI is committed to ensuring that all children, regardless of their circumstances, abilities, sex, gender, sexual orientation, ethnicity, age, displacement, and social, economic and cultural background are welcomed and afforded protection and support. Particular attention should be given to children with disabilities and gender-diverse children, who may be at higher risk of exploitation and abuse. Our policies and procedures uphold equity and respect diverse needs. This includes ensuring that children with disabilities receive information in formats they can easily access, making accommodations for their needs, addressing gender inequalities and power imbalances, promoting inclusive practices, and establishing clear mechanisms they can use to report concerns or abuses, while also addressing the unique risks and challenges faced by these diverse groups. Efforts must address barriers to participation, protection, reporting and support such as language, safety, discrimination and accessibility.

## **Principle 4: Prioritise prevention**

TAI will be proactive in promoting the safety of children and minimising risks to children. Actions to protect children are embedded in policies, programs, recruitment, staff training and daily operations to minimise risks and protect children, both in physical and online spaces.

## **Principle 5: Adopt an empowering and participatory approach**

TAI is committed to empowering 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 are engaged as partners in promoting child safety and wellbeing, fostering trust and enhancing collaboration. TAI will consult with people and communities, including children and adolescents and vulnerable groups to inform the design of child protection approaches. TAI will build on and strengthen existing community and national mechanisms where these are already established and trusted within the community. By building on what is already in place, efforts to assess risks and design child protection responses become more effective, culturally relevant, and sustainable.

## **Principle 6: Reporting incidents is mandatory**

TAI is committed to mandatory and immediate reporting of child protection concerns. Reporting mechanisms, management responses, investigations and support will be trustworthy, culturally appropriate, clear and accessible (including to children) and confidential. All those involved in an incident or allegation will where possible be protected from retaliation, have their confidentiality

and dignity respected and receive appropriate support. Procedural fairness is essential when making decisions that affect the rights or interests of any party involved, including victim-survivors, complainants, witnesses, whistleblowers, and the subject(s) of concern (alleged perpetrator). TAI follows a fair and proper process when making decisions that affect a person's rights or interests and works with implementing Partners [with the expectation/on the basis] that they do the same. The principles of procedural fairness are set out in the Child Safe and SEAH Allegation Management Procedure.

### **Principle 7: Embed safeguarding into organisational culture and leadership**

Effective implementation of child protection measures relies on strong organisational leadership, commitment and a culture that promotes good practice. Leadership should demonstrate accountability and commitment, and organisations can build a culture that promotes risk management and good practice. Effective practices to educate, prevent and respond appropriately to child exploitation and abuse are not cost neutral and require investment.

There is international recognition that adults who have a formal role in working with or supporting children are in positions of trust, power and authority. The relationship between an adult and child is not a relationship of equals. It is a shared responsibility of all adults to prevent child exploitation and abuse. To effectively manage risks to children, all TAI representatives and Consultants must show that they understand and agree to comply with the Policy, Code of Conduct and Child Safe and SEAH Allegation Management Procedure within their induction/onboarding period and during their employment or engagement.

This Policy recognises TAI's responsibilities and commitment to working with implementing Partners to prevent and respond to child exploitation and abuse against children who are in contact with TAI representatives, TAI activities and TAI funded activities.

### **Principle 8: Child safeguarding and theology of development**

Both the Christian scriptures and TAI's theological reflection on development frame TAI's Child Safe strategy. TAI understands development as the process by which people are able to live in a world filled with healthy, vibrant creatures living in safe, just, participatory, and equitable communities who are lovingly engaged with God. This is fullness of life. This is explained more fully in our Organisational Faithfulness document.

## **What does this policy look like in practice?**

TAI takes a risk based approach to safeguard and protect children within our own operations and with partners, that is proportionate to risk and the expected level of contact with children. The table on the following page summarises the child protection standards that will be applied at TAI.



## Child Protection Standards

Level of Contact	Definition	Child Protection Standards Required
Incidental or minimal contact with children	<p>Activities where interaction with children is limited, indirect or incidental</p> <p>Examples include:</p> <ul style="list-style-type: none"><li>• Activities focused on adults but run in a setting where children may be present. E.g. community, school, hospital</li><li>• Delivery of equipment of goods or services at a public event where children are present.</li></ul>	Essential Standards
Direct, sustained or significant contact with children	<p>Activities involving regular or ongoing interaction with children</p> <p>Examples include:</p> <ul style="list-style-type: none"><li>• Activities involving children, service provision to children</li><li>• Interviews with children or collections of stories or images of children</li><li>• Any activity conducted in child spaces or child residential settings</li></ul>	Comprehensive Standards

Refer to [Appendix 1](#) for a detailed explanation of the essential and comprehensive standards that apply to each of the DFAT child protection standards: (1) Child Protection policy, procedures and code of conduct; (2) Reporting mechanism and investigation procedures; (3) Risk management processes; (4) Child protection training; and (5) Child safe recruitment and screening processes.

In addition to the level of contact with children, contextual risk factors will also be considered when determining the level of safeguarding risk in our own practices and for partners. These may include but are not limited to:

- High risk settings: humanitarian settings, locations with high rates of gender-based violence
- Working alone with children
- Direct or unsupervised online contact with children or access to personal details
- Working with children or parents in situations of vulnerability e.g. malnutrition, displaced, children with disabilities, children and families impacted by disasters, unaccompanied minors, children who have been subject to trafficking
- Activities that involve physical contact with children e.g. sports coaching, toileting, health services
- Degree of supervision or trust

- Activities that may lead to employment of children
- Reduced capacity, weak procedures, or history of poor leadership on child protection

The presence of the above contextual factors may elevate the safeguarding risk and require implementation of appropriate strategies to mitigate, manage and reduce risks.

TAI has implemented the following practice to mitigate, manage and reduce risk to children in its operations: -

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## Risk Assessment & Governance

TAI implements comprehensive standards to our risk management processes. Safeguarding risks are identified, monitored and managed in accordance with our Organisational Risk Management Framework and Risk Appetite Statement. Risk matrices are developed at an organisational level and at department and project level. Risk Matrices include mitigation actions to reduce any identified risks.

TAI reports numbers of Safeguarding incidents to its Board on a regular basis to allow Board oversight of Safeguarding. The details are not provided to protect children and vulnerable individuals.

The Safeguarding Committee will prepare an annual Safeguarding Action Plan and undertake a bi-annual Safeguarding Self-Audit. The audit will identify the activities that have potential contact with children, assess the risk and review staff awareness regarding safeguarding policies and matters.

TAI assesses the safeguarding risk presented by its partnerships through regular due diligence and capacity assessment requirements, as detailed in the TAI Partnership Framework and in accordance with the Child Protection Standards Table included above.

TAI requires implementing Partners to conduct a safeguarding risk assessment during project design, and then to provide an updated assessment on an annual basis, in line with the annual

project planning cycle. These assessments are reviewed by Programs staff for inclusion of consideration of risks to children. TAI staff and advisory support are available to Partners to support in the development, monitoring and review of safeguarding risk assessments.

## Recruitment and Engagement

TAI has a robust recruitment, screening process to minimise the risk of a person who poses an unacceptable risk to children being employed by the organisation. TAI must attract safe people who share TAI's values and commitment to protect children. TAI must ensure the Background Checking Policy and Procedures are followed when conducting checks to screen potential representatives. Recruitment and Engagement practices align with DFAT's comprehensive standards.

### Procedures include:

- Using child safe messaging in the job advertisement
- Analysing job roles to determine level of contact with children and apply stricter screening measures for roles involving more frequent or intensive contact with children
- Applicants will be requested to disclose whether they have been charged with child exploitation offences in Australia or overseas in the Job Application Form or Consultant Agreement;
- Using tailored child-protection focused interview questions that match job requirements to determine past actions, beliefs, attitudes, motivations, and values in regard to children and young people and working with them;
- Maintaining an accurate record of the interview process
- Two verbal reference checks - including question relating to the applicant's general conduct and questions regarding any concerns about candidate's conduct when working or interacting with children and young people. One reference must be from the person's current or most recent employer;
- Signed Safeguarding Code of Conduct;
- Verified National Criminal History Check for each country in which the applicant has lived for 12 months or longer over the last 5 years, and for the individual's countries of citizenship.\* Police checks will be **verified** using original or certified documents and be **less than 12 months old**;
- Working with Children Check (upon recruitment and renewed in line with legislative requirements) \*\*
- Once engaged, completion of Safeguarding training suite.

\*A statutory declaration (criminal declaration form) where a foreign police check is not available and disclosing any charges and spent convictions related to child protection, may be accepted in lieu.

\*\* WWCC or equivalent will be undertaken as allowed by legislation.

This process is usually evidenced by::

- Job Application Form;
- Documented criminal record checks;
- Documented verbal referee checks;

- Interview plans incorporating tailored interview questions;
- Documented request for an applicant to disclose whether they have been charged with child exploitation offences and their response.

TAI people including employees, volunteers and all TAI Representatives are responsible for reporting a change in their circumstances to TAI management or the Safeguarding Committee, for example:

- involvement in criminal activity.
- Disciplinary procedures and criminal or civil court proceedings relating to child exploitation and abuse.

The appropriate response to a change in circumstances will be considered by TAI on a case-by-case basis by the appropriate person/s, e.g., as per the Business Continuity Policy, Disciplinary Policy and related procedures.

All employment contracts contain provisions for disciplinary actions up to and including dismissal for any person who breaches the Child Safe Policy or Safeguarding Code of Conduct. Response measures for breach of this Policy and the Safeguarding Code of Conduct are detailed in the TAI Disciplinary Policy.

Recruitment and Selection Practices required by implementing partners will be determined in accordance with the safeguarding risk assessment.

## **Safeguarding Code of Conduct**

The Safeguarding Code of Conduct outlines acceptable and unacceptable behaviour in relation to children and vulnerable adults. All TAI representatives must review the Policy and sign the Safeguarding Code of Conduct, agreeing to comply with the principles and standards they contain. A breach of the Code may result in disciplinary action including termination of employment or engagement.

## **Increasing Awareness of Child Safeguarding Obligations Under the Policy**

The Safeguarding Committee together with our International Program team will increase awareness of child protection among TAI Representatives through ongoing education and training, technical advice, collaboration with all programs and departments, child protection program design and providing day to day guidance.

## **Training**

All TAI representatives, including implementing partners and downstream partners will be trained on child protection and on this policy so that they understand why it is necessary to protect children, their responsibilities in protecting children including mandatory reporting of concerns or allegations about child exploitation and abuse. Training as set out in the training agenda is mandatory.

The Safeguarding Committee sets and reviews the Child Safe training agenda to ensure training is ongoing and relevant. Training in accordance with the Essential Standards is provided, unless the context requires comprehensive standards of training. The Training Agenda includes:

- Basic Child Safe Training as part of orientation and induction, or onboarding and repeated annually
- Regular Safeguarding spotlights in staff meetings and via Teams
- Job specific training, including comprehensive training for staff in contexts assessed as high risk, on child protection in emergencies, pre-deployment training, child rights training, department specific training
- Annual child protection webinars for Partners. Webinars will be tailored to the needs of the partners and delivered as basic training or comprehensive training as required by safeguarding risk assessments.
- A more comprehensive child protection refresher provided every three years which may be facilitated by an external provider.

### **Use of Visual Images, Written Publications and Social Media**

TAI must always portray children in a dignified and respectful manner and not as vulnerable or submissive. Photographs, films of children and website publications must respect and be in the best interest of the child and comply with the Safeguarding Code of Conduct.

Refer to the Informed Consent and Communication Resources Policy for TAI's policy on obtaining consent for communication resources featuring children, including photographs, films, and direct quotes.

### **Visits to International Projects**

TAI recognises the need to implement specific guidelines to manage the child safeguarding risks when allowing people to engage with international programs through participation in 'Supporter Trips' and/or visits to TAI projects. TAI proactively manages these risks by undertaking the following preventative measures:

- TAI will determine the expected level of contact with children and assess other contextual factors in assessing the safeguarding risks associated with each supporter trip and apply a proportionate level of controls
- TAI must facilitate all TAI initiated Supporter Trips and/or visits to TAI projects.
- TAI requires a National Police History Check and Working with Children Check for all people participating in Supporter Trips and/or visits to TAI projects
- All people participating in Supporter Trips and/or visits to TAI projects sign the TAI Safeguarding Code of Conduct.
- TAI must conduct pre-visit Child Safe training covering Child Safe Policy, Safeguarding Code of Conduct, Child Safe and SEAH Allegation Management Procedure and practical examples of Child Safe while on the visit including taking and using photographs.
- TAI will advise the implementing partner if the Supporter Trip and/or visit to TAI projects is cancelled due to a person not providing a National Police History Check, or if a check contains information that would disqualify the person from visiting the program.
- TAI will not intentionally facilitate a direct introduction between Supporter/Child Partner during a Supporter Trip and/or visit to TAI project/s.

## Supporter Program Communication

TAI understands that sponsorship as a funding mechanism includes inherent risks through children's pictures on physical and online profiles and through the activity of letter writing between an adult supporter and a child in a development program across international borders. This form of funding can potentially increase the risk to children participating in the program.<sup>1</sup> These risks will be mitigated by:

- Protection of children's identities by covering a child partner's face in online and physical profiles upon acquisition
- Minimising identifying information, where possible, in images used in communications
- Not facilitating contact outside letter writing. This applies during sponsorship and thereafter, TAI strongly discourages personal communication between an existing or former project participant and supporter outside of the letter writing program.
- Screening all supporters' communication to ensure that no political, religious, or inappropriate comments which could cause offence or are unsuitable to the context are included.
- Concluding a relationship between a supporter and a child partner if a supporter has not followed CYCC Program Guidelines.

## Reporting Child Exploitation and Abuse

All TAI representatives, implementing Partners and third parties must report any concerns they have for the safety or wellbeing of a child including child exploitation and abuse allegations, the possession of child exploitation material, and Safeguarding Code of Conduct or policy non-compliance. The Child Safe and SEAH Allegation Management Procedure must be followed.

TAI will ensure that reporting mechanisms are well publicised, accessible to all stakeholders (including to children), confidential and safe for reporting child protection concerns and include protections from retaliation.

TAI will treat all concerns raised seriously and ensure that all parties will be treated fairly. TAI will meet country, state or territory specific legislative requirements. Any person who intentionally makes a false allegation or malicious allegation will face disciplinary action.

Reports can be made by:

- Completing the [Child Safe and SEAH Reporting Form](#) in accordance with the CS and SEAH Allegation Management procedure.
- Using the Whisplii Speak Up System, which is an anonymous, secure communication system accessible via this link: <https://tai.whispli.com/report>

TAI must immediately notify the Department of Foreign Affairs and Trade (DFAT) (via childprotection@dfat.gov.au) using the [DFAT Incident Notification Form](#) of any concerns relating to the abuse or exploitation of children in DFAT-funded activities, including suspected or alleged instances of child exploitation, abuse and harm.

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<sup>1</sup> Preventative measures outlined in the TAI Child Safe Policy have been taken from the ACFID Guidance for the Development of a Child Protection Policy. Specific guidelines are outlined in the Supporter Welcome Booklet.

Communities involved in TAI activities and TAI funded activities must be informed on how to raise a concern through TAI or the implementing Partner about the safety or wellbeing of a child.

Investigations are conducted in accordance with the Child Safe and Sexual Exploitation, Abuse and Harassment Allegation Procedure and will use trauma-informed responses, procedural fairness, and transparent and timely investigation processes that ensure privacy protections and support for victim-survivors.

## **Measures for Breach of the Policy and Safeguarding Code of Conduct**

Any TAI representative who breaches this Policy and/or Safeguarding Code of Conduct will be managed according to the Disciplinary Policy. In addition, to measures set out in the Disciplinary Policy, TAI will make reports to DFAT and relevant local authorities where it is required to or chooses to do so. TAI's Disciplinary Policy applies alongside any criminal investigation that may apply.

## **Implementing Partners**

Implementing Partners have their own Child Safe Policy and Code of Conduct, or equivalent, in place. TAI will assess and support Partners to socialise and implement their own policies including to downstream partners using TAI's and DFAT's (when required) Policy and Code of Conduct as a minimum standard.

TAI will not knowingly engage Partners with any individual or organisation who poses an unacceptable risk to children or does not meet TAI's child safeguarding compliance standards. Implementing Partners are required to ensure adequate quality standards for safeguarding are met by any downstream partners, or other relevant participating entities, engaged through funded delivery of TAI programs.

It is a requirement that any individuals or partner organisations engaged by TAI report concerns, suspicions or allegations of child exploitation or abuse in TAI or TAI funded activities to TAI. The TAI Child Safe and SEAH Allegation Management Procedure details how TAI monitors and supports partner-led response and investigation to allegations of child safeguarding incidents.

In high risks contexts, where comprehensive standards apply, implementing partners must ensure that:

- Reporting mechanisms are well publicised, accessible to all stakeholders (including to children), confidential and safe for reporting child protection concerns and include protections from retaliation
- Documented procedures are in place to support investigations that include trauma-informed responses, procedural fairness, and transparent and timely investigation processes that ensure privacy protections and support for victim-survivors.
- children, families and communities are informed about expected behaviours, reporting mechanisms and investigation processes in accessible and culturally appropriate ways.

## Responsibilities

Child safeguarding is everybody's responsibility as outlined in the Child Safe Policy and Safeguarding Code of Conduct. Specific roles have responsibilities and accountabilities for child safeguarding and protection including Human Resources (HR), Safeguarding Committee (SC), IP Safeguarding focal point, Board Members, Directors, and Managers. These roles are explained in the Safeguarding Committee Terms of Reference, position descriptions and this policy.

Position	Responsible for:
Director of Risk, Governance and Business Optimisation	<ul style="list-style-type: none"> <li>• Strategic oversight of the policy</li> <li>• Chairing the Safeguarding Committee</li> <li>• Oversight of safeguarding aspects of engaging Board Directors, consultants and suppliers</li> </ul>
The Safeguarding Committee	<ul style="list-style-type: none"> <li>• Reviewing, developing, implementing and managing effective Safeguarding policy and procedures</li> <li>• Ensuring that Safeguarding is embedded into all aspects of TAI's operations</li> <li>• Developing and implementing mechanisms to ensure Safeguarding policies and procedures are being adhered to by TAI Representatives</li> <li>• Identifying and initiating improvements in the way TAI works to ensure policies and procedures are followed</li> <li>• Identifying, responding and escalating, as appropriate, organisational risk within TAI related to safeguarding</li> <li>• Responding to reports of SEAH, child exploitation and abuse, and policy non-compliance</li> <li>• Raising the profile of Safeguarding in all TAI's work, promoting proactive communications and raising awareness both internally and externally.</li> <li>• Conducting child safeguarding risk assessments, audits and spot checks</li> <li>• Monitoring internal and external compliance with the policy</li> <li>• Providing child safeguarding / protection training</li> <li>• Reviewing the policy</li> </ul>
People and Culture Leader	<ul style="list-style-type: none"> <li>• Implementation of recruitment practices</li> <li>• Oversee that the implementation of training for internal staff and volunteers has occurred</li> </ul>
Director of International Programs	<ul style="list-style-type: none"> <li>• Operational implementation of policy with international Partners</li> </ul>

IP Safeguarding Focal Point	<ul style="list-style-type: none"> <li>• Oversight of child safe and PSEAH safeguarding systems</li> <li>• Participating in relevant communities of practice</li> </ul> <p>In collaboration with the Safeguarding Committee:</p> <ul style="list-style-type: none"> <li>• Raising awareness, coordinating, supporting and advising on the development and implementation of safeguarding policy and practice</li> <li>• Responding to reports of SEAH, child exploitation and abuse, and policy non-compliance</li> </ul>
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Compliance with this policy will be monitored by the positions listed in the table above. Noncompliance with this policy will be managed in accordance with the Disciplinary Policy.

## Accessing the Policy

This policy will be available on TAI's Governance Hub on the Policies and Procedures Teams Channel, and from TAI's websites.

This policy will be provided to all staff during induction.

## Review and Amendment

This policy will be reviewed every three years, or sooner as required, and amendments will be made as required in response to changing circumstances.

## Definitions

**Abuse:** Includes but is not limited to the experience of, or witness of, any of the following types of abuse:-

- **Physical abuse** – the use of physical force against a child that results in harm to the child. Physically abusive behaviour includes shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning.
- **Neglect** – the failure by a parent or caregiver to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being.
- **Emotional abuse** – refers to a parent or caregiver's inappropriate verbal or symbolic acts toward a child, or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child's self-esteem or social competence.
- **Sexual abuse** – the use of a child for sexual gratification by an adult or significantly older child or adolescent. Sexually abusive behaviours can include fondling genitals, masturbation, oral sex, vaginal or anal penetration by a penis, finger or any other object, fondling breasts, voyeurism, and exhibitionism and exposing the child to, or involving the child in, pornography.

- **Ill treatment** — disciplining or correcting a child in an unreasonable and seriously inappropriate or improper manner; making excessive and/or degrading demands of a child; hostile use of force towards a child; and/or a pattern of hostile or unreasonable and seriously inappropriate degrading comments or behaviour towards a child.
- **Online or digital abuse**

**Adolescent** – A person between the ages of 10 and 19, adolescents experience a transition period between childhood and adulthood and with it, significant growth and development.

**Child:** A person under the age of 18 years. This is the UN definition of a child.

**Child Abuse Material:** Material that depicts (expressly or implicitly) a child under 18 years of age as a victim of torture, cruelty or physical abuse.

**Child Exploitation:** One or more of the following:

- committing or coercing another person to commit an act or acts of **abuse** against a child, including sexual abuse.
- possessing, controlling, producing, distributing, obtaining or transmitting **child exploitation material**
- Committing or coercing another person to commit an act or acts of **grooming** or **online grooming**.
- Using a child for profit, labour, sexual gratification, trafficking, forced labour, or any other personal or financial advantage.

**Child Exploitation Material:** Material, irrespective of its form, which is classified as child abuse material or child pornography material.

**Child Pornography:** In accordance with the Optional Protocol to the Convention on the Rights of the Child, ‘child pornography’ means ‘any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes.’ For further information regarding child pornography offences, refer to the *Criminal Code Act 1995*.

**Child Pornography Material:** Material that depicts a person, or is a representation of a person, who is, or appears to be, under 18 years of age and is engaged in, or appears to be engaged in, a sexual pose or sexual activity, or is in the presence of a person who is engaged in, or appears to be engaged in, a sexual pose or activity, and does this in a way that a reasonable person would regard as being, in all the circumstances, offensive.

**Child Protection:** Program activities or initiatives designed to protect children from all forms of harm, especially those related to child exploitation and abuse.

**Child Safeguarding:** Preventative measures we put in place to ensure that our organisation, partner organisations and project activities do not expose children to adverse impacts, including the risk of abuse and exploitation, and that any concerns about children’s safety within the communities where we work are appropriately reported. (e.g. policies and procedures put in place to ensure as an organisation we are ‘child safe’)

**Contact with Children:** Working on an activity or in a position that involves or may involve incidental contact with children, either under the position description or due to the nature of the work environment. This can include physical contact, communication (in person, over the phone, or online), and being in the presence of children, even if no direct interaction occurs.

**Criminal Record Check:** A check of an individual's criminal history record. In Australia, national criminal record checks are available through state and territory police departments. They take around 20 working days. The type of employment should be specified as 'overseas employment.' Overseas, different checking procedures apply in each country and may take six weeks or longer. Individuals need to consent to a criminal record check and should be informed of the purpose for which the resulting police clearance certificate will be used, including sighting by DFAT.

**Downstream Partner:** An entity or organisation that is subcontracted or engaged by TAI to perform activities related to DFAT business. Downstream partners are expected to adhere to the same child protection principles, reporting requirements, and standards as direct DFAT partners.

**Grooming:** Generally refers to behaviour that makes it easier for an offender to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child and then seek to sexualise that relationship (for example by encouraging romantic feelings or exposing the child to sexual concepts through pornography).

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

**Informed Consent:** Ensures the child and the parent or guardian understand the implications, purpose and potential uses of photographs or videos.

**Localisation:** Localisation refers to the strategic intent to empower and support local actors, including communities, organisations, and governments, to lead and implement initiatives.

**Online Grooming:** The act of sending an electronic message with indecent content to a recipient who the sender believes to be under 16 years of age, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender. For further details, refer to the Criminal Code Act 1995, Division 474 (telecommunications offences, subdivision C).

**Safeguarding Code of Conduct:** outlines acceptable and unacceptable behaviour in relation to children and other vulnerable individuals.

**Safeguarding Committee:** The Safeguarding Committee is made up of one or more representatives from each functional team within TAI. The Safeguarding Committee is responsible for the development, implementation and promotion of the Child Safe Policy, PSEAH Policy and Safeguarding Code of Conduct.

**Sexual Abuse:** Involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. This may also include involving children in looking at, or in the production of, pornographic material, or encouraging children to behave in sexually inappropriate ways.<sup>2</sup>

**Supporter Trip:** A TAI initiated and organised visit to one or more TAI projects

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<sup>3</sup> Physical, neglect, emotional & sexual abuses are common categories used to explain the different forms of abuse. The definitions outlined above apply as guide when considered for global application. TAI has adopted the National Society for the Prevention of Cruelty to Children (NSPCC) - UK (NSPCC) – <https://learning.nspcc.org.uk/child-abuse-and-neglect>

**TAI Representatives:** TAI activities and TAI funded activities, including TAI subsidiaries, whether in Australia or overseas:

- TAI employees
- TAI volunteers
- TAI interns and work experience students
- TAI Board members

**Trauma Informed:** An approach that prioritises understanding, recognising, and responding to psychological and emotional needs of victim-survivors, promoting their well-being and recovery. It emphasises creating safe environments, providing appropriate support, and avoiding re-traumatisation of victim-survivors

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

**Victim-survivor:** A term used to describe a person who has experienced abuse or exploitation, particularly in the context of child protection. 'Victim-survivor' acknowledges both the harm suffered (victim) and the resilience or agency of the individual 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.

**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 works. This includes child focused activities.

## Related Policies and Procedures

This Policy should be read in conjunction with:

- Safeguarding Committee Terms of Reference
- Safeguarding Code of Conduct
- TAI Code of Conduct
- Child Safe and SEAH Allegation Management Procedure
- Protection from Sexual Exploitation, Abuse and Harassment Policy
- Informed Consent and Communication Resources Policy
- Background Checking Policy
- Recruitment Policy
- Child [Partner] Death Procedure
- TAI Consultant Service Agreement

## External References

This policy draws from domestic and international standards and guidelines, including:

- [ACFID Code of Conduct](#)
- [Australian Government DFAT Child Protection Policy](#)
- Australian Privacy Principles January 2014

- <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child> Setting the Standard: A common approach to child protection for International NGOs: [Setting the Standards: A Common Approach to Child Protection](#)
- CPHA Minimum Standards for Child Protection in Humanitarian Action: [https://alliancecpha.org/en/CPMS\\_home](https://alliancecpha.org/en/CPMS_home)
- External Conduct Standards  
<https://www.acnc.gov.au/for-charities/manage-your-charity/governance-hub/acnc-external-conduct-standards>

## Appendix 1. DFAT Child Protection Standards

More detailed guidance about implementing this policy can be found in [DFAT's Interim Guidance Manual](#).

Standard Number	Essential Standard	Comprehensive Standard
1. Policy, procedures and code of conduct	<ul style="list-style-type: none"> <li>The organisation has a Child Protection Policy or statement or other documented policies and procedures which meet the expectations of DFAT's Child Protection Policy.</li> <li>The organisation has a Code of Conduct that is consistent with the DFAT Child Protection Code of Conduct. All personnel are required to acknowledge they have read and agreed to the organisation's Code of Conduct.</li> </ul> <p><b>Note:</b> Downstream partners are encouraged to develop their own policies, procedures and codes specific to child protection, but may adopt the policies of their upstream partner if appropriate.</p>	<ul style="list-style-type: none"> <li>The organisation has a detailed Child Protection Policy and procedures in place which meet the expectations of DFAT's Child Protection Policy and are subject to regular review. The policy should demonstrate the organisation's commitment to zero tolerance for child exploitation, abuse and harm and establish procedures in line with these standards.</li> <li>The organisation has its own Code of Conduct that is consistent with the DFAT Child Protection Code of Conduct. All personnel are required to acknowledge they have read and agreed to the organisation's Code of Conduct.</li> </ul> <p><b>Note:</b> Downstream partners are encouraged to develop their own policies, procedures and codes specific to child protection, but may adopt the policies of their upstream partner if appropriate.</p>
2. Reporting mechanism and investigation procedures	<ul style="list-style-type: none"> <li>The organisation can receive and manage incident reports safely and confidentially in accordance with Australian and/or local law.</li> <li>Reporting mechanisms are accessible to all stakeholders including children.</li> <li>The organisation must report incidents and investigation outcomes to DFAT.</li> </ul>	<ul style="list-style-type: none"> <li>The organisation has a well-publicised, accessible (including to children), confidential and safe mechanisms for reporting child protection concerns or incidents which includes protections from retaliation.</li> <li>The organisation has documented procedures for managing child protection incidents that include trauma-informed responses, procedural fairness, transparent and timely investigation processes, privacy protections and support for victim-survivors (including children if the victim-survivor is a child), and</li> </ul>



		<p>appropriate disciplinary actions if the incident involves their personnel.</p> <ul style="list-style-type: none"><li>• The organisation ensures children, families and communities are informed about expected behaviours, reporting mechanisms and investigation processes in accessible and culturally appropriate ways. Reporting mechanisms are accessible to all stakeholders including children.</li><li>• The organisation must report incidents and investigation outcomes to DFAT.</li></ul>
3. Risk management processes	<ul style="list-style-type: none"><li>• The organisation undertakes a child protection risk assessment including mitigation actions tailored to the activities and the context, this is reviewed at least annually and revised as needed.</li></ul>	<ul style="list-style-type: none"><li>• The organisation undertakes a child protection risk assessment including mitigation actions tailored to the activities and the context, that is reviewed at least annually and revised as needed.</li><li>• The organisation must provide documented evidence that senior management and executive boards have visibility of child protection risk management.</li><li>• The organisation has documented evidence of its expectations for downstream partners and how those partners will manage child protection risk.</li></ul>
4. Training	<ul style="list-style-type: none"><li>• The organisation provides basic child protection training to all relevant personnel. Personnel are required to complete the training annually.</li></ul>	<ul style="list-style-type: none"><li>• As for Essential Standards, but to a comprehensive level in keeping with the expected high level of risk. See DFAT policy for more details</li></ul>
5. Recruitment and screening processes	<ul style="list-style-type: none"><li>• The organisation conducts recruitment and integrity screening for all personnel (including child safe if applicable). Screening should include reference checks, recent police checks, Working with Children or Vulnerable People checks, or locally appropriate alternatives or, where these are not feasible, a self-declaration.</li></ul>	<ul style="list-style-type: none"><li>• The organisation conducts recruitment and integrity screening for all personnel (including child safe if applicable). Screening should include reference checks, recent police checks, Working with Children or Vulnerable People checks, or locally appropriate alternatives or, where these are not feasible, a self-declaration.</li></ul>

		<ul style="list-style-type: none"><li>Additional integrity measures required include targeted messaging and questioning about child and adult safeguarding at all stages of recruitment and onboarding and ongoing monitoring of staff behaviour and adherence to child protection policies and procedures.</li></ul>
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## Document Control Information

<b>Child Safe Policy</b>	
<b>Owner</b>	Director of Risk, Governance and Business Continuity
<b>Master Copy</b>	Risk & Governance Team
<b>Document Type</b>	<b>Approval required</b>
<input type="checkbox"/> Governance, Substantive Operational/ Organisation Policies	Board
<input checked="" type="checkbox"/> <b>Operational/ Organisation Policies</b>	<b>Executive</b>
<input type="checkbox"/> Departmental Policies	Department Director
<input type="checkbox"/> Procedure	Department Director
<input type="checkbox"/> Substantive Procedure/ Procedure that impacts whole organisation	Executive
<input type="checkbox"/> Other TAI Documents: work instructions, forms, guidelines, manuals	Department Director
<input type="checkbox"/> Other substantive TAI Document	Departmental Director, Executive and Board
<b>Date created</b>	12/11/2011
<b>Date last reviewed</b>	9/9/2025
<b>Date Approved</b>	22/7/2025
<b>Date next Review</b>	28/5/2028

Date	Version	Revision Description	Reviewed / Updated by
2011	1	Created	
24/4/2015	2	Reordering of information, rewriting to make language more succinct, cross checking against DFAT and other industry leaders to ensure policy exceeds standards required.	Director of Business and Board of Directors
02/08/2016	3	Updated review date to 2017	HR Advisor
24/10/2017	4	Reviewed and updated to align with DFAT Child Protection Policy 2017	Policy QA Coordinator, International Program Coordinator (Child Safeguarding Officer) and HR Advisor
18/07/2019	5	Minor update by adding ACNC External Conduct Standards as an External Reference	Policy QA Coordinator
01/11/2019	6	Alignment with PSEAH Policy and Procedures	Policy QA Coordinator

09/05/2022	7	Reviewed and minor updates made to align with current practice.	Safeguarding Committee
27/09/2022	8	Corrected review timeline from annually to every three years	Policy QA Coordinator
23/01/2024	9	Updated date of next review in line with above correction and minor editing updates	Risk & Governance Coordinator
30/5/2025	10	Updated as part of regular review cycle and to align with DFAT revised Child protection policy	Risk & Governance Coordinator
17/09/2025	11	Updated to align with DFAT published Child Protection Policy	Risk & Governance Coordinator