



# Safeguarding Code of Conduct

## Policy Statement

Our Safeguarding Code of Conduct explains what is expected of TAI representatives and what TAI representatives can expect in return, to safeguard themselves and others from harm, including sexual exploitation, abuse and harassment. We explain these expectations so that TAI representatives understand how to do the right thing, all the time as we work for 'a world where poverty has ended, and all people enjoy the fullness of life that God intends'.

TAI acknowledges an imbalance of power between workers and beneficiaries, adults and children, men and women, ability and disability, ethnic and indigenous status, religion, gender identity and sexual orientation, age, health, poverty and geographic location. We acknowledge that an imbalance of power can increase a person's vulnerability.

TAI is committed to preventing sexual exploitation, abuse and harassment by TAI Representatives and implementing partners within all contexts and regarding any power imbalance. Any form of misconduct by a TAI representative is unacceptable and will be dealt with according to the relevant TAI policy and may result in termination of employment or engagement.

## Scope and Purpose

This Policy applies to all TAI representatives, whether in Australia or overseas;

- employees
- volunteers, interns and work experience students
- board members
- contractors and consultants
- participants of supporter trips

TAI is committed to the safety and wellbeing of all children and adults participating in TAI activities and TAI funded activities (Australian based and/ or overseas). Whilst this Code of Conduct protects all children and adults, it aims to particularly reflect TAI's commitment to safeguarding vulnerable persons. Vulnerable persons are defined as a) a child or young person; and b) vulnerable adults.

A child or young person is a person under the age of 18 years. This includes any child a TAI representative comes into contact with, including attendees or participants in TAI or TAI funded events or activities (in Australia and overseas), visitors to TAI's offices and TAI supporters under the age of 18 years. We support the Rights of the Child and will act without hesitation to ensure a child safe environment is always maintained.

Vulnerable adults are people who are either of or above the age of 18, who may be placed in a position of vulnerability including but not limited to not being able to care for themselves and/or not being able to protect themselves from any harm or exploitation. Individuals could be vulnerable due to their position in an organisation, age, gender identity, mental or physical health, ability and disability, ethnic and Indigenous status, race, religious identity, sexual orientation, economic or social status, or being located in disaster or conflict prone regions. We acknowledge that an imbalance of power can increase a person's vulnerability.



I, \_\_\_\_\_, agree that whilst employed, engaged by or representing Transform Aid International, I must:

- Treat all people with respect regardless of their position in an organisation, age, gender identity, mental or physical health, ability and disability, ethnic and indigenous status, race, religious identity, sexual orientation, political opinion, economic or social status, or being located in disaster or conflict prone regions.
- Never use language or behaviour that is inappropriate, abusive, bullying, harassing, sexually provocative, demeaning or culturally inappropriate. Never have a sexual relationship (including sexual intercourse, sexual activity or sexual exploitation) with any program participants, children or any vulnerable adults.
- Never engage in any transactional sex, being the exchange of money, employment, goods or services for sex (including sexual favours) with any adult engaged in TAI activities and TAI funded activities, or with any child (engaged in TAI activities or TAI funded activities or not). Never engage in any sexual activity with children (persons under the age of 18) regardless of the age of the majority or the locally recognised age of consent. Mistaken belief in the age of the child is not a defence.
- Never engage with commercial sex workers or engaging in prostitution of any form whilst on a work trip (including travel time, field visits and leisure time) and representing TAI, even if commercial sex work is legalised in that country.
- Never develop a relationship that involves or appears to involve bias, preferential treatment or improper use of your position including but not limited to a close and emotional relationship involving intimate relations, public displays of affection and/or public expression of intimate relations.
- Strongly discourage sexual relationships between implementing partner staff and program participants. If a relationship develops, ensure that a conflict of interest is declared to protect against exploitation and abuse.
- Unless absolutely necessary, ensure that, another adult is present when in contact with children involved in TAI activities or TAI funded activities in Australia and overseas.
- Encourage all children and adults, parents/guardians, community members, implementing partner organisation representatives and representatives of TAI to raise concerns of any exploitation and/or abuse and harassment.



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- Not invite unaccompanied children that participate in TAI activities or TAI funded activities into my place of accommodation, unless they are at immediate risk of injury or in physical danger.
- Not sleep close to unsupervised children unless necessary, in which case I must obtain my manager's or the TAI representative's permission, and ensure that another adult is present (if possible).
- Not do things of a personal nature that a vulnerable person can do for him/herself, such as providing aid with changing clothes or using the bathroom
- Not hold, kiss, cuddle or touch a vulnerable person in an inappropriate, unnecessary or culturally insensitive way.
- Not consume alcohol or illegal substances within the presence of children or provide alcohol or drugs to children including illegal and prescription substances.
- Not under any circumstances provide gifts to vulnerable people that have not been approved by a TAI representative.
- Never possess, control, distribute, obtain or transmit child exploitation material or child pornography.
- Not use physical punishment or discipline of children participating in TAI activities or TAI funded activities.
- Comply with all relevant Australian and local legislation, including labour law in relation to child labour.
- Immediately report concerns or allegations of wrongdoing including but not limited to exploitation, sexual exploitation, abuse, harassment and/or policy non-compliance in accordance with TAI Child Safe and SEAH (Sexual Exploitation, Abuse and Harassment) Allegation Management Procedure.
- Immediately inform my manager of any concerns that my words, actions or behaviour in any situation may be considered to breach the Child Safe Policy, PSEAH Policy and Code of Conduct.
- Immediately disclose all charges, convictions and other outcomes of an offence, which occurred before or occurs during my association with TAI and relates to child exploitation and abuse.
- Not knowingly link any Child Partner with a supporter who is known to intend harm to a child.



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- Not knowingly provide any identifying information about a child to a supporter.
- Not develop inappropriate relationships with any child who participates in TAI activities of TAI funded activities. This includes having contact with a child who is a supporter or volunteer through personal telephone, email or social media accounts.
- Ensure children involved in TAI activities or TAI funded activities are well informed of the process and have provided consent for any photos/film or stories gathered.
- Not publish undignified\* photos taken of children in Transform Aid International programs in social media.

\* Undignified:

- Images should be decent and respectful and not present people as victims.
- Images should not depict people in a vulnerable or submissive manner.
- People (especially children) should be adequately clothed in photographs and not in poses that could be interpreted as sexually suggestive.
- Paternalistic images should be avoided, e.g. portraying the agency/donors as the 'providers'.
- Photographs should be used in context and should be a true representation of events.

## **USE OF CHILDREN'S IMAGES FOR WORK RELATED PURPOSES**

Before photographing or filming a child or using images, I must:

- Assess and endeavour to comply with local traditions before photographing or filming a child.
- Obtain informed consent from the child and parent / guardian before photographing or filming a child. As part of this I must explain how photographs and / or video will be used.
- Ensure that photographs, film, videos and DVD 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 an honest representation of the context and the facts.
- Only use images that are relevant to the organization or implementing Partner's activities and services, such as children participating in an activity specifically associated with the organization or implementing partner.



- Not produce photographs, films, videos or DVDs that contain identifying information about children for example, show a school uniform, a document with a child's name, address, telephone number or location.
- Ensure file labels, text descriptions and metadata do not reveal identifying information including GPS location data about the child when sending or publishing images electronically.
- Where using images in communications, that I have sighted the consent form for the Image, ensure that it is filed appropriately, and I am aware of when that consent will expire.

**I will conduct myself in a manner consistent with TAI's values (Called, Caring, Together, Dedicated, Innovative) and Child Safe and PSEAH Policies and Allegation Management Procedures.**

**I understand that it is my responsibility, as a TAI representative, to avoid actions or behaviours that are, or could be construed as exploitation, sexual exploitation (including sex transactional or otherwise), abuse, harassment, sexual harassment and/or bullying.**

**I understand that it is my obligation to report wrongdoing or suspicion of wrongdoing following the TAI Child Safe and SEAH (Sexual Exploitation, Abuse and Harassment) Allegation Management Procedure.**

<b>Name</b>	
<b>Signature</b>	
<b>Date</b>	



## Document Control Information

Safeguarding Code of Conduct	
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Master Copy	Policy QA Coordinator
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Date	Version	Revision Description	Reviewed / Updated by
01/08/2011	1	Created	HR Advisor
02/06/2017	2	Updated to apply to people participating in supporter trips. Updated photograph consent requirements.	Policy QA Coordinator & HR Advisor
10/10/2017	3	Updated to align with ACFID standard (gifts, consumption of substances, physical contact)	HR Advisor
23/10/2019	4	Updated after PSEAH changes	Governance & Risk Coordinator; HR Manager
09/12/2019	5	Updated to Safeguarding – combining Child Safe and PSEAH within one Code of Conduct	Chief of Staff; Governance & Risk Coordinator; HR Manager; Safeguarding Officer
16/03/2020	6	Clarified definitions of children and adults	Policy QA Coordinator
6/5/2022	7	Review by Safeguarding Committee	Safeguarding Committee

**IMPORTANT INFORMATION: If this Code is revised, please ensure that the Supporter Trip Booklet titled “Travelling with TAI” is updated to align.**