ENSURING CHILD SAFEGUARDING

Plan International Australia Child Safeguarding Procedures
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PART 1: UNDERSTANDING CHILD SAFEGUARDING
Introduction

Plan International Australia believes every child and young person has the right to live a life free from any form of violence, and deserves to grow up in a safe, peaceful, nurturing and enabling environment where they can fully exercise their rights.\(^1\)

The United Nations Convention on the Rights of the Child (1989) provides a foundation for the way Plan International works with children, both here in Australia and overseas. All Plan Participants\(^2\) are responsible for protecting children “... from all forms of physical and mental violence, injury or abuse, neglect, maltreatment or exploitation, including sexual abuse.”\(^3\) These guidelines are informed by a set of principles derived from the UN Convention on the Rights of the Child. They state that:

- All children have equal rights to protection from abuse and exploitation. All children should be encouraged to fulfil their potential, and inequalities and discrimination should be challenged.
- Everybody is responsible for the care and protection of children.
- Plan has a duty of care toward children who, either directly or indirectly, come into contact with us.
- Our duty of care extends to our partner organisations and individuals.

In addition, the Universal Declaration of Human Rights recognises fundamental human rights, the dignity, worth and equal rights of people at any age, thus including young people aged 18 to 24 years old.

Plan International Australia’s Safeguarding Children and Young People Policy (SCYPP) clearly voices our global commitment to protecting children. It states, “PIA is fully committed to the gender responsive safeguarding of all children and young people from all forms of violence. We take very seriously our responsibility and duty to ensure that we, as an organisation, and anyone who represents us, does not in any way harm, abuse or commit any other act of violence against children and young people or place them at risk of the same.

We promote child and youth safe practices, approaches, interventions and environments which respects, recognises and responds to the specific safeguarding needs and addresses the protection risks of the differing gender and other identities. We take a zero tolerance approach to all forms of violence against children and young people. We will challenge and do not tolerate inequality, discrimination or exclusion.

We respond to a child or young person who may be in need of protection and or psycho-social support and intend that their welfare and best interests will at all times be of paramount consideration. In the event that a child or young person has been harmed, PIA will do all that is legally and practically feasible to provide follow up support to that child or young person, particularly through referral to appropriate agencies, and at the very minimum will ensure the child is at no further risk of experiencing that same harm.

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\(^1\) As detailed in the Plan International position statement ‘The Rights of Children and Young People to Live Free From Violence’

\(^2\) Plan Participants are Plan in Australia staff, associates and visitors as outlined in Plan’s Child Protection Policy.

We ensure that all who work with, and engage with us, understand and are supported in their responsibilities to meet our safeguarding roles and responsibilities. We take positive action to prevent anyone who might be a risk to children and young people from any association or involvement with us and take stringent measures against PIA participants who perpetrate an act of violence against a child and/or young person. We promote the active involvement of children and young people in their own gender responsive protection.

Plan International Australia is a signatory to the Australian Council for International Development (ACFID) Code of Conduct.


The guidelines aim to introduce the issue of child safeguarding at a local level, both within the organisation and the community. It provides procedures on how to deal with child abuse and exploitation when a child, young person, member of the local community or anyone employed by or associated with PIA raises a suspicion, allegation or concern of harm to a child or young person. It also includes procedures on how to prevent violence against children and young people through safe recruitment and management practices, preventative programs such as police and database checking, and marketing practices that are mindful of protecting children. The guidelines also include customised child safeguarding standards for each department.

The behavioural guidelines in this document are designed to protect children. However, they can also help to protect Plan Participants from false accusations of inappropriate behaviour or abuse. They describe how Plan Participants can behave appropriately with children.

**Who are these guidelines for?**

These guidelines apply to:

1. Plan International Australia staff, **managers and directors**

2. PIA associates, including board members, volunteers, interns, consultants, contractors, suppliers and supporters (including donors, sponsors, advocates and ambassadors). This also includes the staff and representatives of partner organisations/government with whom PIA works and anyone who, while working with or for PIA, is in contact with children or who have access to Plan International child-sensitive data.

3. PIA visitors, including journalists, media, researchers and celebrities who may come in contact with children through PIA.

These people are referred to collectively as **PIA Participants**.

During their induction and while working with Plan International Australia, every PIA Participant should be made aware of the PIA Safeguarding Children and Young People Policy, **Code of Conduct** and these procedure guidelines.
**Context**

**Child protection and safeguarding = child rights**

The United Nations *Convention on the Rights of the Child* is the basis for child protection and establishes a universal duty of care for children and young people. PIA’s *Safeguarding Policy* clearly states that all children have an equal right to protection.

The fundamental principle of the Convention is the recognition that children’s rights are human rights.

The Convention rests on four foundation principles:

1. Non-discrimination (Article 2)
2. The best interests of the child (Article 3)
3. The child’s rights to life, survival and development (Article 6)
4. Respect for the views of the child (Article 12).

For more information on the United Nations *Convention on the Rights of the Child* visit:


**Who, what, where?**

Violence against children and young people occurs not only in families but in institutions and workplaces, on the streets, in war zones and in emergencies. Children and young people in especially difficult circumstances, such as homeless children and young people, children and young people with disabilities, children and young people in conflict with the law, and children and young people living in institutions, war zones and emergency situations are especially vulnerable to abuse and exploitation.

Professionals and other adults who work with children or young people in a position of trust can also cause harm.

Child abusers (particularly sex offenders) who want to gain access to children often target child-centred organisations by appearing to have a genuine concern for them.

Abuse and exploitation happens to children and young people of all ages, sexes, genders, ethnicities, social backgrounds, abilities, sexual orientation, religious beliefs and political persuasions. Abuse can be inflicted on a child or young person by adults, and by children or young people themselves. Bullying is a common form of violence, where children or young people may experience physical and emotional abuse resulting from the actions of their peers. In addition, children or young people may sexually abuse their peers.

Prejudice and discrimination can prevent some children and young people from getting the help they need. Children or young people with disabilities are particularly vulnerable. They can often be vulnerable due to dependency on caregivers, communication difficulties and physical disabilities. Children or young people with disabilities are often treated differently to others, and this can result in severe maltreatment and neglect, sometimes resulting in death.
Children or young people with disabilities may:

- Receive intimate personal care, possibly from a number of carers, which increases the risk of abuse
- Not be able to resist or avoid abuse
- Not be able to communicate their difficulties or have the relevant vocabulary, making it difficult to tell others what is happening
- Not have someone to turn to. They may lack the privacy to do this, or the person they turn to may not be receptive to their issues.
- Be afraid to complain because they fear losing services
- Be especially vulnerable to bullying and intimidation
- Be more vulnerable than other children to abuse by their peers.

In addition:

- Society devalues and disempowers people with disabilities. Their lack of opportunity to participate may lead to them lacking access to services.
- There is a lack of awareness amongst carers, professionals and the general public about the vulnerability of children and young people with disabilities and indicators of abuse.
- Some people believe that children and young people with disabilities are not prone to abuse. This can lead to denial and a failure to report abuse.
- There is a general lack of communication and consultation with children and young people with disabilities about their experiences, views, wishes and feelings, and this robs them of choice and control in many aspects of their lives.
- Inappropriate and poorly co-ordinated support services can leave children and young people with disabilities and their families unsupported and isolated. Isolation is widely considered to be a risk factor for abuse.

Children and young people from minority ethnic communities may be the direct target of violence in the form of discrimination, harassment or hostility. They may also suffer indirectly from discrimination directed toward their family.

Children and young people from areas with high levels of poverty are often the direct target of abuse in the form of exploitation, including child trafficking and child labour.

Children and young people living in popular tourist destinations are vulnerable to abuse by child-sex tourists (people who travel overseas and sexually abuse children) and organised paedophile rings.

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Children and young people are abused via cyber technology. Paedophiles and other abusers target and/or ‘groom’ children via the internet and mobile telephones.

**Cultural understandings of abuse**

In many countries where Plan International works, there are different understandings of what constitutes child abuse. Each Plan International office is expected to develop specific guidelines and procedures that fit within the local context.

This does not mean Plan International accepts norms and values that condone abuse. Plan International has a responsibility to challenge behaviours and seeks to change practices that harm children. All but one of the countries in which we work has signed the UNCRC and these internationally agreed standards should be our starting point. How Plan International works to challenge and change behaviours is a matter for local discussion and judgement.

The definition of violence against children and young people should be understood within local contexts. Initially, the definition of ‘neglect’ may seem to apply to most children we work with. Clearly, we don’t want to invoke the Safeguarding Children and Young People Policy for all these children, however, staff should be able to recognise and respond to situations where a child is harmed because they receive significantly less care than other children that is within the caregivers’ ability and resources to provide.

Plan International condemns traditional harmful practices (THP) including female genital cutting. Practices that are harmful or potentially harmful to children should be seen as child protection issues and must be challenged. Plan International’s local child safeguarding procedures should include what to do when state laws have made these practices illegal. In-country programs should respond to these issues but be aware that individual cases may also require a response under the Global Safeguarding Children and Young People Policy.

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5 Say No to Abuse – Practice Guidance and Standards for Keeping Children Safe in Plan 2006
Definitions

Associate refers to a range of contracted paid and non-paid individuals who have committed to work with or support a Plan International Entity. It includes, among others, board members, volunteers (including community volunteers), interns, sponsors, researchers, donors, consultants and contractors, staff and/or representatives of partner organisations and local governments (when operating in partnership agreement with PIA).

Bias/Hate Crime is a crime or violent act committed with a bias motive. It is an act which targets an individual or group, motivated by prejudice or intolerance towards their real or perceived national origin, race, ethnicity, colour, religion, gender, gender identity, sexual orientation, disability, language, physical appearance, or other characteristic, or a combination thereof. Non-criminal actions that are motivated by these reasons are called ‘hate / bias incidents’.

Bullying is now understood to be a significant and very common form of harm that children experience. This may take the form of physical or verbal intimidation, aggression, violence, or exclusion on the part of a person – typically a peer or another child/young person - who is more powerful than the victim of the bullying. Bullying may happen for a number of reasons and includes expressions of racist and sexist attitudes.

Child in line with the United Nations Convention on the Rights of the Child and for the purposes of this Global policy, is defined as any person – girl, boy, young woman, young man, and children of other gender identities - under the age of 18 years (UNCRC Article 1). (See definition of Young Person/People or Youth below).

Child Abuse is defined as all forms of physical abuse, emotional ill-treatment, sexual abuse and exploitation, neglect or negligent treatment, commercial or other exploitation of a child and includes any actions that results in actual or potential harm to a child.

Child abuse may be a deliberate act or it may be failing to act to prevent harm. Child abuse consists of anything which individuals, institutions or processes do or fail to do, intentionally or unintentionally which harms a child or damages their prospect of safe and healthy development into adulthood.

Commercial or other exploitation of a child refers to use of the child in work or other activities for the benefit of others. This includes, but is not limited to, child labour and child prostitution. These activities are to the detriment of the child’s physical or mental health, education, moral or social-emotional development (WHO, 1999).

Children living in especially difficult circumstances are often more vulnerable to abuse. Prejudice and discrimination can prevent some children getting the help they need.

Children living with a disability can often be vulnerable due to their dependency on caregivers and isolation due to their difficulty or inability to communicate with others or physically move to seek help if needed. The differential treatment of children with disabilities means they are more likely to suffer severe maltreatment and neglect, sometimes resulting in death.

Children from minority ethnic communities may be the direct target of abuse in the form of discrimination, harassment or hostility or suffer indirectly from the discrimination directed towards a child’s family.

**Contact with children** means working on 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 (also see Working with children definition).

**Director** is an Executive Director of PIA.

**Direct beneficiaries** are the people who are the target of, and who we know will be immediately affected by one or more project outputs; irrespective of whether these are delivered directly by Plan International Australia or by partners or organisations who are acting on behalf of Plan International Australia.

- Direct beneficiaries are individuals who receive materials, equipment; interventions such as training, awareness raising, mentoring or other personal support.
- Direct beneficiaries may be a single member of a household (for example a mother participating in training on nutrition); or it may be all members in the household (for example, distribution of hygiene kits or malaria nets that the whole family use).

**Emotional ill-treatment or psychological violence** includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure, so that the child can develop a stable and full range of emotional and social competencies commensurate with her or his personal potential, and in the context of the society in which the child dwells. There may also be acts toward the child that cause or have a high probability of causing harm to the child’s health or physical, mental, spiritual, moral or social development. These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust or power. Acts include restriction of movement, patterns of belittling, denigrating, scape-goating, threatening, scaring, discriminating, ridiculing, or other non-physical forms of hostile or rejecting treatment (WHO, 1999).

**Harm** is any detrimental effect on a child's or young person's physical, psychological, or emotional wellbeing. Harm may be caused by 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.

**Internet abuse and abusive images of children** Abusive images of children, commonly referred to as child pornography, is defined as 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 sexual purposes.

**Manager** refers to a Staff member who has responsibility for line managing or supervising the work of Staff or Associates.

**Neglect and negligent treatment** is the inattention or omission on the part of the caregiver to provide for the development of the child in all spheres: health, education, emotional development, nutrition, shelter and safe living conditions, in the context of resources reasonably available to the family or caretakers and which causes, or has a high probability of causing, harm to the child's
health or physical, mental, spiritual, moral or social development. This includes the failure to properly supervise and protect children from harm as much as is feasible.

**Physical Violence** of a child is that which results in actual or potential physical harm from an interaction or lack of interaction, which is reasonably within the control of a parent or person in a position of responsibility, power, or trust. There may be single or repeated incidents.

**Safeguarding children and young people** is the responsibilities, preventative, responsive and referral measures that we undertake to protect children and young people, ensuring that no child or young person is subject to any form of harm as a result of their association with the organisation. This includes, ensuring that their contact with us and those associated with us and/or their participation in our activities, interventions and operations is safe and where there are concerns over a child or young person’s welfare or where a child or young person has been subject to violence, appropriate and timely actions are taken to address this and incidents are analysed so as to ensure continued learning for Plan International Australia.

**Safeguarding - Gender Responsive Safeguarding** is a safeguarding approach that:

- takes full account of gender in considering the specific safeguarding needs of girls, boys and other gender identities;
- integrates safeguarding measures that address protection risks for children and young people (girls, boys, young women, young men, and children of other gender identities) that stem from issues relating to gender bias and discrimination; and
- supports the empowerment and fosters the inclusion of girls, particularly in the safeguarding process, in a manner that promotes equality, equity and ultimately their increased safety and protection.

**Serious Abuse** The term “serious” is used in relation to cruel deliberate or unusual maltreatment of children and is meant to distinguish these incidents from prevalent low-level violence against children which is a regrettable feature of some societies. These refer to incidents of a deliberate preventable nature which constitute a crime against children in local law. For example in settings where physical punishment remains a common form of discipline, extreme punishment including the use of implements and punishment which causes bleeding, bruising and broken bones should be reported within these procedures.

**Sexual Violence (Child)** the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared and cannot give consent, or that violate the laws or social taboos of society. Child sexual abuse is evidenced by an activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person. This may include but is not limited to the inducement or coercion of a child to engage in any unlawful sexual activity; the exploitative use of a child in prostitution or other unlawful sexual practices; the exploitative use of children in pornographic performances and materials.

**Significant Harm** The concept of significant harm can be used when deciding on whether a child has been or is being treated in an abusive or neglectful way. There is no absolute criteria on which to rely — consideration is given to the severity of ill-treatment; the degree and extent of physical harm; the duration and frequency of abuse and neglect; the extent of pre-meditation; the degree of
threat and coercion etc. Significant harm can be caused by one traumatic event or a compilation of events that interrupt, change or damage the child’s physical or psychological development. The level at which harm to a child can be regarded as significant is difficult to define but should nevertheless form the basis of discussions of any concerns

*Spiritual Abuse* occurs when a spiritual leader, or someone in a position of spiritual power or authority (whether organisation, institution, church or family) misuses their power or authority, and the trust placed in them, with the intention of controlling, coercing, manipulating, or dominating a child. Spiritual abuse is always about the misuse of power within a framework of spiritual belief or practice, in order to meet the needs of the abuser (or enhance his or her position) at the expense of the needs of the child. Spiritual abuse results in spiritual harm to a child and can be linked to other abuse, such as physical, emotional and sexual abuse.

*Staff* refers to individuals who receive a regular salary for work in any Plan International Entity as well as individuals paid by or through a Plan International Entity but located in another entity.

*Violence* against a child or young person includes all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, emotional ill-treatment or psychological violence, sexual abuse and exploitation, harassment, and commercial or other exploitation of a child or young person. Acts of violence can also take place online through, for example, the web, social media or mobile phones. It may be an intentional act involving the use of physical force or power or it may be failing to act to prevent violence against a child or young person. Violence consists of anything which individuals, groups, institutions or organisations do or fail to do, intentionally or unintentionally, which either results in or has a high likelihood of resulting in actual or potential harm to the child or young person’s wellbeing, dignity and survival and development.

*Visitor* refers to a range of persons who are visiting Plan’s offices or programmes and may come into contact with children and young people through Plan International Australia, including journalists, media, researchers, visiting sponsors and celebrities.

*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.

*Young Person/People or Youth* in line with United Nations definitions, include individuals – young women, young men, and young persons of other gender identities - aged 15 years to 24 years old. This group spans the categories of ‘children’, ‘adolescents’ and ‘adults’ but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.
Indicators and impacts of child abuse

Indicators of child abuse

Physical abuse

Possible physical signs:
- Bruises (including bruises which look like hand or finger marks), burns (including cigarette burns), scalds, sprains, dislocations, human bites and cuts
- Injuries that the child cannot explain, or explains unconvincingly
- Untreated or inadequately treated injuries
- Injuries to parts of the body where accidents are unlikely such as thighs, the back and the abdomen.

Possible behavioural signs:
- Becomes sad, withdrawn or depressed
- Has trouble sleeping
- Behaves aggressively or is disruptive
- Shows fear of certain adults
- Is afraid to return home or of parents being contacted
- Lacks confidence and has low self-esteem
- Is very passive and compliant
- Uses drugs or alcohol
- Continually runs away.

Sexual abuse

Possible physical signs:
- Pain, itching, bruising or bleeding in the genital or anal areas
- Genital discharge or urinary tract infections
- Stomach pains
- Discomfort when walking or sitting
- Sexually transmitted infections.
**Possible behavioural signs:**
- A marked change in the child's general behaviour
- Is unusually quiet and withdrawn, or unusually aggressive
- Shows unexpected fear or distrust of a particular adult/s
- Starts using sexually explicit behaviour or language. This is particularly important if the behaviour or language is not appropriate for their age.
- They describe receiving special attention from a particular adult, or refer to a new "secret" friendship with an adult or young person.

**Emotional abuse**

**Possible signs:**
- Delayed physical, mental and emotional development
- Highly anxious
- Showing delayed speech or sudden speech disorder
- Low self-esteem
- Inappropriate emotional responses to painful situations
- Extremes of passivity or aggression
- Abuses drugs or alcohol
- Continually runs away
- Steals compulsively.

**Neglectful/negligent treatment**

**Possible signs:**
- Is dressed inappropriately for the season or the weather. Exposure symptoms might include recurrent colds, pneumonia, sunburn or frostbite.
- Has poor personal hygiene
- Is inadequately supervised or left in the care of an inappropriate caregiver
- Has untreated medical problems
- Is frequently hungry
• Is malnourished. They may be undersized; have low weight and a sallow complexion; lack body tone; and be constantly tired.

• Frequent lateness or non-attendance at school

• Steals compulsively

• Abuses drugs or alcohol

• Has low self-esteem

• Has poor social relationships.

**NOTE 1:** Keep in mind that due to varying degrees of poverty, many of these indicators, specifically those referring to physical abuse and neglect, will be evident within many Plan International communities. Despite their best efforts, the means to prevent such indicators may be beyond the control of parents and caregivers within Plan International communities. For example, despite their best efforts, families within Plan International communities may have children who are malnourished. This is not considered neglect because it is not an intentional denial of the child’s basic needs. Rather, it is a consequence of the socio-economic difficulties that challenge many Plan International-assisted families and communities. All investigations into cases of suspected child abuse by parents or primary caregivers, in relation to neglect, should be mindful of this.

**NOTE 2:** These indicators are to be used as a guideline only. Children and young people who have been abused may present other indicators that are not mentioned above. Children and young people who have not been abused may present some of these indicators. Also, a child or young person may be subjected to a combination of abuses. It is important that each allegation of child abuse is investigated in a fair and sensitive manner to ascertain whether such indicators are the result of violence.

**The impact of child abuse**

Violence damages children and young people physically, emotionally and behaviourally. Its impact can result in both short-term and long-term effects on children, young people, their families and their communities.

Short-term effects may include:

• Impaired ability to enjoy life

• Low self-esteem

• Impaired brain development

• Anxious attachment to parents

• Fear or distrust

• Self-destructive behaviour such as depression or suicidal tendencies

• Medical problems such as sexually transmitted infections, pregnancy and physical injury
• Emotional problems such as guilt, anger, hostility, anxiety, fear, shame and lowered self-esteem
• Behavioural problems such as aggression, delinquency, nightmares, phobias, and eating and sleeping disorders
• School problems and truancy
• Inappropriate, sexualised behaviour.

Research by ACT for Kids (previously the Abused Child Trust) indicates child abuse and neglect can have the following long-term consequences on subsequent growth and development.

Personal consequences:
• Retarded cognitive development
• Poor self development
• Poor language development
• Diminished verbal skills
• Possible psychiatric disorders
• Lower self-esteem.

Interpersonal consequences:
• Inability to form meaningful relationships
• Lowered social maturity
• Diminished life coping skills.

There is also an increased likelihood of:
• Poor health
• Self-destructive behaviours
• Homelessness and depression
• Abusing their own children
• Future delinquency
• Adult crime, such as violence
• Substance abuse
• Personality abnormalities
• Youth suicide
• Violence or aggressive behaviour.

In addition, the Paediatrics and Child Health Division of the Royal Australian College of Physicians reports in *Protecting Children is Everybody’s Business: Paediatricians Responding to the Challenge of Child Abuse* that abuse and neglect can lead to:

• Extreme attention-seeking behaviour
• Delayed developmental milestones
• Non-organic failure to thrive during infancy
• Psychosocial growth failure in older children.

Their study showed that children who are physically abused and maltreated are up to three times more likely than non-abused children to be violent, commit crimes, attempt suicide and suffer from anxiety disorders when they are teenagers and are more likely to be victims of violent assault.

The study also found that children who are abused and exposed to constant threats process information from the world differently to other children, and therefore respond in a different way. For example, children in a state of fear:

• Have a shortened sense of future. Immediate rewards are gratifying, and delayed gratification and reflection on their behaviour (and its consequences) is not possible.
• Are less able to process and store verbal information. They are therefore less likely to perform well in school and are often thought to have learning disabilities.

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*Protecting Children is Everybody’s Business: Paediatricians Responding to the Challenge of Child Abuse* - Paediatrics and Child Health Division, Royal Australasian College of Physicians, 2000.
Australian legislation

Many countries have some form of legislation that aims to protect children from violence. This legislation varies in its level of effectiveness across different countries, and is implemented to differing degrees. However, it is essential for PIA staff to be fully aware of the legal context of the country they operate in and the relevant parts of the law that relate to child protection so PIA can effectively use the law to protect children and ensure we comply with our legal requirements, such as mandatory reporting of criminal offences against a child.

Commonwealth Principle acts:


Criminal Code Act 1995:

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<td>Division 272 (child sex offences outside Australia)</td>
<td>Engaging in sexual intercourse outside of Australia with a child under 16 years of age</td>
<td>20 years imprisonment</td>
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<tr>
<td></td>
<td>Engaging in sexual activity outside of Australia with a child under 16 years of age</td>
<td>15 years imprisonment</td>
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<tr>
<td></td>
<td>Engaging in sexual intercourse or sexual activity outside of Australia with a child under 16 years of age and the child has a mental impairment or is under the care, supervision or authority of the defendant</td>
<td>25 years imprisonment</td>
</tr>
<tr>
<td></td>
<td>Engaging in sexual intercourse outside of Australia with a young person aged 16 or 17 years and the defendant is in a position of trust or authority</td>
<td>10 years imprisonment</td>
</tr>
<tr>
<td></td>
<td>Engaging in sexual activity outside of Australia with a young person aged 16 or 17 years and the defendant is in a position of trust or authority</td>
<td>7 years imprisonment</td>
</tr>
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<td></td>
<td>Grooming a child under 16 years of age to engage in sexual activity outside of Australia</td>
<td>12 years imprisonment</td>
</tr>
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<td>Division 273 (offences involving child pornography material or child abuse material outside Australia)</td>
<td>Possessing, controlling, producing, distributing or obtaining child pornography or child abuse material outside Australia</td>
<td>15 years imprisonment</td>
</tr>
<tr>
<td>Division 474 (telecommunications offences, subdivision C)</td>
<td>Accessing, soliciting or transmitting child pornography or child abuse material using a carriage service</td>
<td>15 years imprisonment</td>
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<tr>
<td></td>
<td>Engaging in sexual activity with a child under 16 years of age using a carriage service</td>
<td>15 years imprisonment</td>
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<tr>
<td></td>
<td>Online grooming of a child under 16 years of age</td>
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</table>

The Crimes (Child-Sex Tourism) Amendment Act

Crimes Act 1914 Part IIIA – Child-Sex Tourism
The Crimes Act 1914 sets out the laws that govern the way legal proceedings under the Criminal Code Act 1995 are conducted, including the conduct of investigations and the protection of children involved in proceedings for sexual offences.

It is a crime for Australians to engage in or benefit from sexual activity with children (under 16 years of age) whilst overseas. This law carries penalties of up to 25 years’ imprisonment. The Australian Federal Police are actively monitoring and prosecuting child-sex tourists.

Papua New Guinea and Solomon Islands have relevant legislation and reporting requirements available at the relevant office and from the Child Safeguarding Focal Points and contained in the individual country mapping documents.

**The legalities of reporting child abuse**

As advised by legal firm Slater and Gordon, privacy legislation in Australia does not override PIA’s responsibility to report child protection concerns to the Australian State or Federal Police, based on our suspicions of inappropriate activity. Given our duty of care and position of trust with the children, young people and their parents, it is in the best interest of those parties for us to report our suspicions if there is evidence of a crime.
Part 2: Responding and reporting
Responding to child abuse and exploitation

When working with children and young people — especially vulnerable children and young people living in high risk situations — it is inevitable that staff and associates will, at some stage, be confronted by some kinds of protection issues. These will mainly be external to the organisation, but PIA acknowledges children and young people may sometimes be at risk or be harmed by adults employed by or associated with agencies such as PIA.

An organisation with an open and vigilant culture regarding safeguarding of children and young people, which also has an effective reporting procedure, increases its ability to be a child and youth safe organisation. Child abusers are less likely to target or remain in an environment where children, young people, the local community, and PIA staff and volunteers are trained to identify and report inappropriate behaviour.

These guidelines should help people identify the steps to take when reporting and responding to concerns, suspicions or allegations of harm against children or young people.

It is mandatory for all PIA Participants to report any witnessed, suspected or alleged incidents of harm against children or young people or violation of the Safeguarding Children and Young People Policy or Working with Children Code of Conduct. Failure to report may result in disciplinary and/or other appropriate actions being taken.

Reporting safeguarding concerns is not easy but it is extremely important that concerns, suspicions or allegations are reported immediately to protect the allegedly affected child or young person from further harm, to secure evidence and to ensure action is taken in relation to the alleged perpetrator. The exception is when the affected child or young person has urgent medical and/or safety needs that have to be attended to before a formal report can be made.

PIA will treat all reports seriously, and our response will reflect the seriousness of the concern or allegation.

PIA will ensure that the interests of anyone making a report are properly protected and that all parties involved with the reporting process are treated fairly. The principles of natural justice will be a prime consideration. We will aim to manage the reporting process in a professional, confidential and expedient manner.

If children and members of PIA-assisted communities have a concern about the inappropriate behaviour of a PIA Participant and want to report a suspicion or allegation of harm occurring to a child or young person, they should be made aware of their rights and directed to the relevant Child Safeguarding Focal Point so they can make a report. The relevant Child Safeguarding Focal Point is the one assigned to the complainant's country/region.
How to report violence and abuse against children and young people

Who to report to

If you have a concern, suspicion or any information that harm is occurring to a child or young person, it is your responsibility to report this. The reporting procedures are outlined later in this section.

If you are in Australia, report your concerns to:

Child Safeguarding Advisor/Focal Point, Melanie Sleap

melanie.sleap@plan.org.au

Telephone: (03) 9672 3671

If the matter is urgent, and the Child Safeguarding Advisor (CSA) is unavailable, contact the Focal Point backup Executive Team member Gaye Wealthy.

Gaye.wealthy@plan.org.au

Telephone: (03) 9672 3626

If you are in Papua New Guinea, report your concerns to:

Child Safeguarding Focal Point, Alvin Kumani (PNG Finance and Operations Coordinator)

Alvin.kumani@plan.org.au

Telephone: +675 71824201

Mobile: +675 7182 4201

If you are in the Solomon Islands, report your concerns to:

Child Safeguarding Focal Point, Emmanuella Kauhue (Solomon Islands Country Program Manager)

Emmanuella.kauhue@plan.org.au

Telephone: +677 29922

Mobile: +677 747 8637

All Pacific Child Safeguarding Focal Points report to the Australian Child Safeguarding Advisor, Melanie Sleap, who will be advised of the report within 24 hours.

If any of the Pacific Child Safeguarding Focal Points are unavailable you can report directly to the Australian Child Safeguarding Focal Point, Melanie Sleap

You can also report by emailing: anochildprotection@plan.org.au
If you are overseas, report your concerns to:

The Safeguarding Children and Young People Focal Point (SCYPFP) or a Senior Manager located in that Plan International Country Office (where a SCYPFP is not available). It is good practice to check who is the SCYPFP whilst making your travel arrangements or upon arrival at the Plan International office.

The local overseas Plan International Safeguarding Children and Young People Focal Point/Advisor/Manager reserves the right to liaise with the Plan International Australia Child Safeguarding Advisor and the relevant authorities if necessary, including the Australian Federal Police under the Crimes (Child Sex Tourism) Amendment Act 1994.

International Head Office contact details:

Global Safeguarding Unit: SafeguardingandEngagement.Unit@plan-international.org

Director of Safeguarding Children and Young People – Mariama Deschamps

mariama.deschamps@plan-international.org.au

Telephone: 44 (0) 1483 733 346

When to report

Reporting of concerns, suspicions or allegations should be acted upon immediately or within 24 hours.

What safeguarding concerns are reportable under the policy?

Plan International Australia works in many countries where the situation of many children and young people may be described as 'abusive'. Millions of children and young people live in extremely difficult circumstances where they are denied their basic human rights, are exploited and are in need of protection in a collective sense. Many of these issues are ones that we may tackle through our child protection programme and influencing work. The Safeguarding Children and Young People Policy, being an internal/organisational policy does not require that Plan Participants intervene in the lives of children and young people where abuse is occurring in the "wider sense" as this would be an unrealistic use of the policy.

For this reason Plan International Australia’s local procedures are used first and foremost to report and respond to incidents of or concerns about violence against children and young people where the alleged perpetrator/s falls within the scope of the Safeguarding Policy (Plan Participants).

However, the guidance also covers violence against children and young people which are perpetrated by individuals who are outside the scope of our Safeguarding Policy (i.e. individuals who are not Plan Participants) where such violence is serious and criminal in nature.

Reporting under the policy can therefore be summarised as follows:

1. Where the alleged perpetrator is a Plan Participant, all safeguarding concerns and breaches of the policy (including those related to our interventions, activities, operations and engagement) must be reported.
2. Where the alleged perpetrator is outside the scope of the policy (i.e. not a Plan Participant) only safeguarding concerns relating to sexual abuse and exploitation, concerns which suggest a crime has been committed as per the local legislation, and other serious forms of violence which are reported to the Plan International Australia office/staff, should be reported under the policy.

All types of abuse and violence regardless of who the perpetrator is where local law so requires.

The above reporting requirement ensures that as an organisation we never ignore serious forms of violence and crimes perpetrated against children regardless of whom the perpetrator might be and ensures that we address all safeguarding issues and concerns within own activities.

Within each office there are staff designated for dealing with breaches of the Safeguarding Children and Young People Policy. These staff are known as the Safeguarding Children and Young People Focal Points.

IMPORTANT: If you have a concern, don't worry or waste time wondering whether the concern is something that should be reported under the policy. Simply make a report to your Safeguarding Children and Young People Focal Point and/or the relevant Office Director. They will then take further action to ensure that the issue is addressed and appropriate referrals are made in line with local procedures.

**What is serious abuse?**

The term ‘serious’ is used to describe cruel, deliberate or unusual maltreatment of children (whether this be physical abuse, emotional abuse or neglect). The term distinguishes these incidents from prevalent, low-level violence against children that is a regrettable feature of some societies. Serious abuse refers to incidents of a deliberate and preventable nature that constitutes a crime against children in local law. Even in settings where physical punishment remains a common form of discipline, extreme punishment should be reported. This includes punishments that use implements and when punishments cause bleeding, bruising and broken bones.\(^8\)

The above reporting requirement ensures PIA never ignores serious forms of abuse and crimes perpetrated against children, regardless of the perpetrator. We also ensure that we address any form of abuse or exploitation (low-level or serious) within our own activities.

**Grounds for concern**

All reports concerning possible violations of the PIA SCYPP and Code of Conduct must be taken seriously, regardless of whether they constitute illegal or prohibited acts in the country in which they are allegedly committed.

Grounds for concern that must be reported include (but are not limited to):

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\(^8\) Definition provided by Lorraine Wilson, International Child Protection consultant.
• A specific indication from a child or young person that s/he is being harmed, or if a child or young person gives reason to suspect that they or another child/ren or young person/people is/are being harmed

• A statement from a person who witnessed/heard of/is concerned about/suspects that violence is occurring

• Any sign, illness, injury or behaviour which is consistent with possible harm or abuse or which gives rise to concern or suspicion

• A symptom, injury or behaviour which may not be consistent with abuse but which, when coupled with other information or evidence, gives cause for concern

• A child or young person PIA is in contact with abuses or harms another child or young person

• Seeing or hearing about abuse or exploitation in another organisation or in a community in which PIA works

• A practice or behaviour suggesting a PIA participant has used the power invested in him/her, by virtue of his/her post, to harm a child or young person

• Inappropriate use of Plan’s photographic equipment, mobile phones or computers, including evidence of child pornography

• PIA participants engaging in suspicious behaviour that could be associated with sexual exploitation or trafficking

• An allegation/concern/rumour from any source that indicates a PIA participant has breached PIA’s SCYPP and related behavioural protocols as detailed in the Plan International Australia Code of Conduct. This also relates to concerns regarding past behaviour.

• Any violation of the behavioural protocols as detailed in PIA’s Visit Agreement Form

• Any expression of concern about a PIA Participant from an external body that is related to any of the above grounds for concern.

Child to child abuse

Sometimes you may be concerned about the way a child or young person behaves toward another child or young person. Grounds for concern will exist in cases where there is an age difference and/or difference in power, status or intellect between the two. It is important to ensure these cases are not ignored and they must be reported in the same manner.

However, since the alleged perpetrator is still a child, such cases should be handled with extra sensitivity. Any response should seek to protect and consider the safety needs of both the child victim and the alleged child abuser.
**Historical allegations of abuse**

Cases of abuse are often reported some time, even years, after the event. When such a case is reported, it must still be taken seriously and raised through the appropriate reporting process, irrespective of the length of time since the alleged event.

Most importantly, IF IN DOUBT SPEAK OUT.

**What to record and report**

These scenarios illustrate situations that must be recorded and reported under PIA’s safeguarding children and young people procedures. However, since they are only illustrations, there are many more situations that may require recording and reporting.

<table>
<thead>
<tr>
<th>Nature of concern</th>
<th>Recording/reporting action</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. A Plan International staff member witnesses or receives a report on a minor incident. For example, a teacher is seen delivering a mild slap to a child's leg or a father is reported to have shouted harshly at his son in the village.</td>
<td>This is a minor incident/low-level abuse and the alleged perpetrator is outside the scope of the SCYPP. Therefore no formal reporting is required under the SCYPP, unless local legislation considers this behaviour to be abusive. Note: The office may decide to record such incidents for its own monitoring purpose. Over time, such incidents may give rise to behavioural patterns that require some form of intervention, either with an individual or as part of a program/advocacy response to an identified protection issue. If this is the case, this decision should be detailed in the local reporting and responding procedures.</td>
</tr>
<tr>
<td>2. A Plan International staff member witnesses a serious incident. For example, a teacher in a school with no association to Plan International hits a child in his class and the child receives a broken arm.</td>
<td>The alleged perpetrator is outside the scope of the SCYPP but this scenario is a serious physical assault and is probably a criminal offence. Therefore, reporting under the SCYPP is required. This incident should be reported to</td>
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<td></td>
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<tr>
<td>3.</td>
<td>A serious incident which is external to Plan International (the alleged perpetrator and victim have no formal relationship to Plan International) is reported to a Plan International staff member. The staff member is aware of a case of serious physical or sexual abuse in the community and ensures that this is reported to the local statutory agencies responsible for dealing with child protection cases. Plan International may be active in making or supporting this referral.</td>
</tr>
<tr>
<td></td>
<td>The alleged perpetrator is outside the scope of the SCYPP but the scenario is a serious abuse/crime which Plan International staff are aware of. We need to keep track of the matter, ensure we have correctly referred it on, and monitor any other involvement.</td>
</tr>
<tr>
<td></td>
<td>Reporting under the SCYPP is also required.</td>
</tr>
<tr>
<td></td>
<td>This incident and referral/support action should be reported within the local office in line with local procedures.</td>
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<tr>
<td></td>
<td>The incident should be recorded using the Incident/Loss Notification Form and a notification should be made to the RO and IH.</td>
</tr>
<tr>
<td></td>
<td>The report should record details on Plan's involvement and the support and advice we gave.</td>
</tr>
<tr>
<td></td>
<td>Annual data on cases is collected by IH.</td>
</tr>
<tr>
<td>4.</td>
<td>Any incident/concern, which may be serious or minor, is reported/witnessed/suspected/rumoured/alleged against a PIA participant</td>
</tr>
<tr>
<td></td>
<td>The alleged perpetrator falls within the scope of the SCYPP. All incidents, whether minor/serious, should be reported under the SCYPP.</td>
</tr>
<tr>
<td></td>
<td>Incidents should be reported in line with the local office and in line with local procedures.</td>
</tr>
<tr>
<td></td>
<td>The incident should be recorded</td>
</tr>
</tbody>
</table>

the police and within the local office in line with local procedures.

The incident should be recorded using the Incident/Loss Notification Form and a notification made to the Regional Office (RO) and International Headquarters (IH).

Annual data on cases is collected by IH.
Key principles for reporting: ACT!

**Act on your concerns**

- If you witness, suspect or know any information about the abuse of a child or young person or have concerns involving significant harm or serious abuse to a child or young person, it is your responsibility to report this to the Child Safeguarding Advisor (in Australia) or the Child Safeguarding Focal Point (in PNG and SI) or the Safeguarding Children and Young People Focal Point or relevant Senior Manager (overseas). Remember, **IF IN DOUBT SPEAK OUT**.

- Act immediately. Inaction may place children in further danger.

**Child-centred approach**

- The most important consideration is the protection of children and young people.

- Children and young people’s health and welfare needs are also important and must be addressed.

- Decisions within the reporting and responding process are based on the ‘best interests of the child’.

- The views and wishes of children and young people must be sought, taken seriously and used to inform decision-making as far as possible.

**Timely and appropriate actions**

- Ensure responses to incidents and concerns, suspicions or allegations are timely, effective and appropriate.

- Confidentiality is important. Information should be shared on a ‘need to know’ basis.

- The reporting process should fully recognise and be based on thorough understanding of local contexts, including local laws and child protection systems.

- It is essential to work with other agencies, including statutory/national agencies, to protect children and young people.

- Involve the right people at the right time. Reports should be made to the SCYPFP
Incident reporting (receiving a complaint)

Incident reporting is when a third party reports their concern to you regarding the suspected or known abuse of a child or young person.

Anyone can raise genuine concerns or allegations about the suspected or known abuse of a child or young person by a PIA Participant, including a member of the child or young person’s family or the local community.

Concerns, suspicions and allegations can be raised in relation to a child or young person’s welfare where there is no specific disclosure or allegation made by the child or young person.

In serious cases, it is necessary to take urgent action, but often child protection concerns develop over time and may not be clear-cut. It is still important to report them to the SCYPFP/CSFP as soon as they arise, in response a longer process of internal reporting and decision-making.

Concerns regarding the inappropriate behaviour of a PIA Participant or a member of a partner organisation must be reported. Concerns raised about a child or young person being harmed by someone who is not directly involved with PIA must be reported to the CSFP/SCYPFP for assessment and possible referral to local authorities and/or agencies.

Incident reporting procedure

Information regarding an allegation of harm to a child or young person may be used in subsequent disciplinary or legal action and therefore needs to be carefully recorded, in detail. When receiving a complaint, please use the following procedure:

1. **Respond calmly** and listen **carefully** to what the complainant says.

2. **Reassure** them that they were right to raise the concern.

3. **Take what they say seriously.** The unthinkable is possible.

4. **Address any immediate protection or health needs.** Before you undertake any reporting, ensure the complainant’s physical safety, psychosocial needs and medical needs are addressed.

5. **Create trust** with the complainant but **DO NOT** promise to keep secrets.

6. **Gather information about the concern or incident.** IMPORTANT! Do not undertake your own investigation, as this should be done by trained staff/individuals.

7. **Avoid asking too many questions.** Only ask questions that help you gain a clear understanding of the complaint. This will help you to pass it on via the appropriate reporting procedures. The best questions to ask are “W” questions:

   "What (happened)?"

   "Where (did it happen)?"

   "When (did it happen)??"
"Who (did it/was there)?”

Asking "Why?” and “How?” something happened is discouraged

Remember to establish the age and details of all children or young people who are or may be at risk.

8. **Address issues of confidentiality.** Explain that you can only ensure limited confidentiality, but that information will only be shared on a ‘need to know’ basis, and that it is in their best interest that the abuse was reported. You may wish to obtain a written consent from the complainant so the information can be made available to others within the case management system.

9. **Explain to complainant what will happen next.** Tell them who will be told, both within and external to Plan International (for example, parents/guardians, health agencies or social services). Tell them that you will let them know what happens.

10. **Report** the complaint to the Child Safeguarding Focal Point (CSFP) as soon as possible.

11. **Record the information with the CSFP.** You will need to spend time with the CSFP to record your concern/report and assist to identify potential risks to those involved. The information you share may be used to make a decision on further referrals or undertake a formal investigation. **Record the actual words used.** This is important, especially when allegations are about sexual abuse and exploitation.

12. **Make yourself available for interviewing** by the CSA and, if necessary, a Senior Manager. The CSA may take notes and use them in an internal or external investigation.

**Do not:**

- Panic or show an extreme reaction to what the complainant says (such as shock, distaste or disbelief)
- Speculate or make assumptions
- Make negative comments or judgmental statements about the alleged abuser. Remain objective.
- Inform the alleged abuser about the complaint
- Make promises or agree to keep secrets
- Permit personal doubt to prevent you from reporting the allegation/s
- Take the matter into your own hands. It will be followed up.
- Try to conduct your own investigation
- Offer to put the abused child or young person up at your home, no matter how desperate their circumstances appear.

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9 Draft Model Complaints and Investigation Procedures and Guidance Related to Sexual Abuse and Sexual Exploitation. March 2004
Inter-Agency Standing Committee Task Force on Protection from Sexual Exploitation and Abuse
Disclosure

‘Disclosure’ is when a child or young person discloses they are being or have been harmed. Children may disclose this to a PIA participant.

Disclosure procedures

1. Respond calmly and listen carefully to what the child or young person says.

2. Reassure the child or young person. Tell them that they were right to raise the concern. The child or young person is never to blame in situations of violence and should be reassured they have done nothing wrong, either in relation to the violence or for reporting it.

3. Take what they say seriously. The unthinkable is possible.

4. Address any immediate protection or health needs. Before you report the allegation, attend to any urgent psychosocial or medical needs and ensure the child or young person is safe. If you believe a child or young person is in immediate danger (for example, they have just described a serious physical assault by their stepfather and are due to go home), arrange for the child or young person to temporarily go to a safe place. If, as a result of the assault, the child or young person needs emergency medical treatment, make sure they get the necessary treatment.

The Australian Institute of Family Studies has information on how to report abuse and neglect within Australia, including contact details for relevant statutory agencies within each state in Australia: https://aifs.gov.au/cfca/publications/reporting-abuse-and-neglect

PNG and SI contact details for relevant statutory agencies are listed within the mapping tools as held by all Child Safeguarding focal points and within the individual offices.

5. Create trust with the child or young person but DO NOT promise to keep secrets.

6. Gather information about the concern or incident. IMPORTANT! Do not undertake your own investigation. This should be done by trained staff/individuals. Start a discussion with the child or young person to clarify the allegation (rather than adopting an interviewing style).

- During the discussion try not to repeat the same question. This may give the child or young person the impression they did not give correct information the first time or that you do not believe them.

- Remember that the child or young person has taken a risk. Responding in a positive and empathic manner will encourage the child or young person to talk more readily and openly to others in later investigations.

- Avoid asking too many questions. Only ask questions that help you gain a clear understanding of the complaint. This will help you to pass it on via the appropriate reporting procedures. The best questions to ask are “W” questions:

  a. "What (happened)?"
  b. "Where (did it happen)?"
  c. "When (did it happen)"
d. "Who (did it/was there)?"

Note: Asking "Why" and "How" something took place is discouraged.

- Avoid questioning the child or young person unless what they say is unclear. Avoid leading questions. Use open and non-specific questions, for example, “Can you explain to me what you mean by that?”

7. Remember to establish the age and details of all children or young people who are/may be at risk.

8. Explain what will happen next and issues of confidentiality. You may need to tell the child or young person that you need to share their information with someone else so you can help them. Tell them who will be told within Plan International and external to Plan International (for example parents/guardians, health agencies or social services). Tell him/her that you will let them know what happens. Also, bear in mind that the child or young person may have been threatened and/or may be feeling bad about reporting the abuse and feels very vulnerable. Try to address their fears and concerns.

9. Report the complaint to the Child Safeguarding Advisor/Child Safeguarding Focal Point or Senior Manager as soon as possible.

10. Record the information with the CSA. You will need to spend time with the CSA to record your concern/report and assess the potential risks to those involved. The information you share may be used to make a decision on further referrals or undertake a formal investigation. Record the actual words used. This is important, especially when allegations are about sexual abuse and exploitation.

11. Make yourself available for interviewing by the CSA and, if necessary, a Senior Manager. The CSA may take notes and use them in an internal or external investigation.

**Do not:**

- Panic or show an extreme reaction to what the child or young person says (such as shock, distaste or disbelief)
- Speculate or make assumptions
- Make negative comments or judgmental statements about the alleged abuser. Remain objective.
- Inform the alleged abuser about the complaint
- Make promises or agree to keep secrets
- Permit personal doubt to prevent you from reporting the allegation/s
- Take the matter into your own hands. It will be followed up
- Try to conduct your own investigation
- Offer to put the child or young person up at your home, no matter how desperate their circumstances appear.
Anonymous reporting

When a concern, suspicion or allegation is reported anonymously, it does not necessarily have less substance than one reported by a child, young person or adult who is prepared to be identified and give evidence. An anonymous report may indicate fear of reprisal. If this is the case, anonymous reports should be treated as seriously as ‘named’ reports, although the extent to which they can be investigated may be limited by the anonymity. Managers and project staff should also consider how to facilitate anonymous reporting for children (for example, via an anonymous reports box). PIA staff are expected to submit named reports but when, for any reason, this is not an option (for example genuine fear of reprisal), they can make an anonymous report using the Whistle Blowing Policy. Anonymous reports should contain enough facts to verify the issue.

Within the disciplinary process, it is sometimes possible to maintain the anonymity of someone reporting protection concerns or providing a witness testimony. Indeed, in some cases it is not desirable to reveal who is reporting the issue, or who are the victims or other witnesses, as this could seriously compromise their safety.

When an incident relates to someone in another organisation

PIA staff may receive reports or disclosures about suspected harm to children or young people perpetrated by staff from other agencies. These reports must be documented and passed on to the CSA using the Incident Reporting Procedure. The CSA or a senior staff member (Executive Team) must then relay these concerns to the local head of the agency (preferably in person) and also in writing to the agency’s head office (for example to the CEO or Director of Human Resources). Criminal breaches should be reported to the statutory authorities as previously described.

PIA should seek feedback on their referral’s progress and outcomes. If it seems insufficient action has been taken to protect children or young people, PIA may decide to pursue further action.

Confidentiality

Always report information on possible or actual harm to children or young people. All information relating to violence against children or young people, including details of alleged victims, witnesses and alleged abusers, must be considered confidential. This means treating the information carefully and respectfully, and only sharing it with people who need to know about it. It does not mean keeping secrets.

Any allegation of child abuse is serious. A breach in confidentiality can have devastating effects on the life of the child victim, their family, the person reporting it and the alleged abuser. Maintaining confidentiality ensures a fair and proper process.

Sometimes, to protect a child/ren or young person/people, information offered by an individual may need to be passed on against their express wishes. This is a particularly difficult issue when it

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10 It is also not possible to guarantee limited disclosure or transfer of information. Inevitably a number of key staff within Plan International will need to know about and become involved in making and managing the response to such incidents. Nor can the information always remain in-house when a referral is made to national authorities.
is a child or young person disclosing or alleging harm, especially since PIA believes that the child or young person’s view must be taken into consideration. In such a case, refer to the guidelines on disclosure.

At the beginning of the reporting process, it is important to inform the child, young person and their family that sensitive information will need to be shared with the police, child protection agencies or other institutions in some instances. This could be done verbally or (preferably) by a written statement.

The decision to pass on information should be discussed with the child or young person and their views should be sought. Discuss how to release the information and safeguard it. It is important that the child, young person and their family continue to be informed about what is happening.

Unless harm or violence has been solidly proven, always refer to an issue as “alleged”, and all records must be kept in a secure location.
Incident involves individual external to Plan

If incident is serious notification to the Global Child Protection Advisor at IH

Refer to relevant local agency/body

Incident involves individual internal to Plan – i.e. Plan Staff or Associate

Plan Australia CPA reports to CEO & Global Child Protection Advisor (GCPA) at IH within 24 to 48 hours

Within 24 hours

GCPA informs/involves other senior staff. Plan Serious Incident Group / Case Management Meeting convenes as required

If necessary, arrange urgent medical assistance and/or immediate protection if the child is in imminent danger

Where allegation suggests a crime may have been committed e.g. serious physical assault, sexual abuse, report externally to national authorities.

A full risk assessment is carried out depending on severity of incident

Nature of allegation/ concern agreed and level of investigation required, i.e. decision regarding referral to:

- Internal investigation
- Police
- CP (statutory) Services

Report issue immediately to ANO Child Protection Advisor (CPA completes an initial risk assessment)

If incident is serious notification to the Global Child Protection Advisor at IH

Nature of allegation/ concern agreed and level of investigation required, i.e. decision regarding referral to:

- Internal investigation
- Police
- CP (statutory) Services

Child protection issue - suspicion, incident, allegation

Within 24 hours
How to make a report to Plan International overseas

Child protection issue - suspicion, incident, allegation

Report issue immediately to local Child Protection Focal Point or Senior Manager (CPA completes an initial risk assessment. Other people to be informed: Country Director/Regional Director/National Director)

Incident involves individual internal to Plan – i.e. Plan Staff or Associate

CPA reports to Global Child Protection Advisor (GCPA) at IH within 24 to 48 hours

GCPA informs/involves other senior staff. Plan Serious Incident Group / Case Management Meeting convenes as required

A full risk assessment is carried out depending on severity of incident

If necessary, arrange urgent medical assistance and/or immediate protection if the child is in imminent danger

Where allegation suggests a crime may have been committed e.g. serious physical assault, sexual abuse, report externally to national authorities.

Nature of allegation/concern agreed and level of investigation required, i.e. decision regarding referral to:

- Internal investigation
- Police
- CP (statutory) Services

Incident involves individual external to Plan

If incident is serious notification to the Global Child Protection Advisor at IH

Refer to relevant local agency/body

Within 24 hours

Reporting overseas
**Reporting procedure**

a. All child safeguarding reports (for example from a child, young person, parent or staff member) should be recorded immediately or within 24 hours using PIA’s Incident reporting form. The form should be signed, dated and passed on immediately to the Child Safeguarding Advisor (CSA) if in Australia, the designated Child Safeguarding Focal Point (CSFP) in the Pacific, or the line manager or designated Safeguarding Children and Young People Focal Point if overseas.

Suspicion of abuse or risk. Where no abuse allegation or disclosure has been received, but there are suspicions of possible child abuse or risks to children, discuss this with the CSA if in Australia, or the line manager or designated CSFP if overseas (see 'b' below) as a matter of urgency. This discussion and the decisions reached must be recorded in writing using PIA’s Incident reporting form.

**Difficulties with the reporting route.** The first point of contact is the CSA/CSFP (or designated Executive Team member if the CSA is unavailable). However:

- If the staff member genuinely believes this reporting route is compromised, believes they would be victimised, has no confidence in the local management structure or, at any stage, feels dissatisfied with the manner in which the issue is being dealt with, the report should be raised directly with another manager or CPFP at the Plan International regional or IH level.

- If, for any reason, it is not possible to make contact with the people listed in your local procedures, the report must be made to another senior manager or preferably the Global Safeguarding Unit or the Director of Safeguarding Children and Young People at IH.

- The line manager and/or designated CSFP are responsible for making further reports up the management chain, in line with local procedures.

b. **Discussing actions with the Child Protection Advisor/Focal Point.** You should discuss:

- Whether the child has/had any immediate safety and welfare needs which need to be/have been addressed.

- Whether the actions or allegations you are dealing with indicate a possible criminal offence. If this is the case, refer the matter to the local investigative authorities.

**Responding to reports**

Plan can respond to reports of child abuse allegations in two ways:

1. Report internally = internal investigation

2. Report externally = external investigation

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11 The outcome of an internal investigation could be the decision to report to relevant authorities, who would then conduct an external investigation.
Working in conjunction with staff who are already involved in the process at the national office, regional and country levels, the GSU and other IH staff will agree on a strategy for managing each case and agree to actions to address the situation.

When concerns or allegations are raised about a PIA staff member, volunteer, consultant, contractor, visitor, partner organisation member or others within the scope of Plan’s policy, and when there is no apparent criminal breach and no need to take urgent action, a process of internal discussion and decision-making will be initiated. The CSA must report the incident to the Global Safeguarding Unit at IH as soon as possible. The GSU will inform and involve key people at IH level, liaise with the office making the report and help to develop an action plan to respond to the concern.

When an allegation suggests a crime may have been committed, such as serious physical assault or sexual abuse, an external report to national authorities will be made.

**Do not inform the alleged abuser that the report has been made.** Staff and managers who are involved in the report should not approach or inform the alleged abuser, or make any internal or external response, unless they have been specifically requested to do so by the CEO or Country Director, who should have sought appropriate advice on this action from the Regional Director and Global Safeguarding Children and Young People Director at IH. Contacting the alleged abuser may undermine subsequent police or internal formal investigations.

The CSA will carry out an initial risk assessment of the case to ensure all risks (including risks to the alleged victim, witnesses, Plan and the alleged perpetrator) are identified and appropriately managed.

Further responses will be made depending on whether the subject of concern or the alleged abuser falls within the scope of PIA’s SCYPP.

A feedback process, including an evaluation of lessons learned and recommendations for improvement, will occur after each case. This will help to better handle child protection incidents and develop policy and practice in this area.

All Plan offices must also follow these standards as outlined in PIA’s Child Safeguarding Implementation Standards – Practise Guidance for Keeping Children Safe in Plan:

- When internal child protection concerns are investigated, they must be guided by PI’s *Guidelines for Carrying out Administrative Investigations*. Ensure you identify local personnel responsible for the investigation, that all parties maintain confidentiality and that those involved in the investigation are regularly informed of the process.

- If a child must be interviewed as part of an investigation, special attention should be given to providing a trained interviewer of the right gender, providing an interpreter (if needed) and choosing an environment where the child feels reasonably safe.\(^\text{12}\)

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\(^{12}\) It is best practice to obtain parental (guardians’ and carers’) consent prior to interviewing a child, as they are best placed to support and protect the child. However, in instances where this is not appropriate, consideration should be given to (a) a child’s request for an appropriate person to accompany them, (b) obtaining alternative support from a community elder or existing advocacy groups etc. Full guidance is available in Plan’s *Guidelines for Carrying out Administrative Investigations*. 

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• Complaints and reporting processes must be regularly updated to take into account any significant change/s.

Note: In serious cases, it is necessary to take urgent action. However, child protection concerns often develop over time and are not clear-cut. It is still important to report them soon as they arise, but a longer process of internal reporting and decision-making may be appropriate. As part of the reporting process, the CSA should inform local and regional senior managers as soon as possible.

**External reporting**

In Australia it is not mandatory for members of international non-government organisations to report abuse (it is for professionals in the education and health sectors), however Plan in Australia has a moral obligation and is duty-bound to report alleged cases of child abuse to Plan International Headquarters, the police or child welfare authorities.

In every case in which a crime appears to have been committed against a child/children, the default position should be for immediate referral to the police or relevant statutory authorities responsible for investigating such matters and for protecting children. However, this needs serious consideration in countries and places where there are doubts about the integrity and/or competence of police or other agencies, and therefore where referrals could violate the best interest of the child. In this case, the local or regional Child Protection Officer and International Head Office Child Protection Advisor would assess the incident and provide support, advice and referral as he/she determines appropriate.

Other appropriate action may include informing other relevant Plan offices.

Any decision to not report criminal allegations (for example sexual abuse) to police or other statutory authorities should be documented and include the reasons for not reporting it\(^3\).

Such a decision must be informed by ‘the best interest of the child’, the protection needs of other children (for example failure to report someone to the police may expose other children to subsequent abuse) and Plan’s legal and professional responsibilities.

All decisions must be documented and appropriately endorsed by the Director or other senior manager.

**External reporting procedure**

The CSA and Executive Team usually decide whether to make an external report once a child protection disclosure or concern has been reported. If the matter is urgent, the CSA will make a report to the relevant and agreed authorities, and then report to International Head Office. Once there is an agreement to make an external report, the CSA should contact the relevant authorities to make an official report. The report should always include a written version that is also sent to the Senior Management Team and the relevant Regional Child Safeguarding Officer, Country Director and Global Safeguarding Unit/Director at the International Headquarters. A detailed record of information gathered via the complaints procedure (including information documented on the Incident/Loss Notification Form) should be kept confidentially on file because it

\(^3\) This section refers to overseas incidents. Criminal offences should always be referred to local authorities in Australia as support structures and systems exist to adequately address such disclosures.
may be used in subsequent disciplinary or legal action. Make every effort to ensure the security of these files.

The CSA should monitor the progress of any external reporting, and should evaluate and report on the process and outcome to the Senior Management Team, relevant Country Director, Regional Director and International Headquarters. In addition, the relevant Child Safeguarding Officer (or appropriate Officer/Director) at program country level is responsible for informing the child and their family of the investigation’s progress and outcome.

If the matter is not deemed urgent, the Child Safeguarding Advisor must still report in a timely manner to International Headquarters' Global Safeguarding Unit/Director (as per the global child protection reporting procedures), who will liaise with senior staff. After consultation with the Country Office (if the incident took place overseas), they will then make their decision regarding reporting.

**Note:** In addition to the Australian Federal Police\(^4\), the CSA has access to and can report to Child Protection and Police services in each state. These contacts are reviewed and updated annually.

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Where the alleged perpetrator is outside the scope of the SCYPP (i.e. not a Plan staff member, associate or visitor in contact with children through Plan)

In all cases, where a criminal offence or serious abuse is indicated, consideration must be given to reporting the matter to the national investigative authorities and/or local child protection agencies.

Plan should seek feedback on the referral’s progress and outcomes. When it seems insufficient action has been taken to protect children, Plan may decide to pursue further action.

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**As per our Head Agreement with the Department of Foreign Affairs and Trade (DFAT), Plan International Australia must advise the DFAT Child Protection Team promptly in writing if the incident is connected to a DFAT funded project or activity.**

**Why report?**

Child abuse and neglect are serious, persistent problems. Through the SCYPP, Plan is committed to safeguarding children, preventing abuse whenever possible, and responding quickly and appropriately when abuse is suspected. If the policy is to achieve its aims and intention, it is essential that all Plan participants\(^15\) understand their responsibility when reporting and responding to potential child safeguarding risks. **It is mandatory to report child safeguarding issues where children are possibly being abused or are at risk of abuse.**

Not reporting a child safeguarding concern or not doing enough about a concern can leave children unprotected and at risk of further abuse. It may also mean more children become harmed. Furthermore, it is important to follow the proper reporting and responding procedures so the child

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\(^{14}\) Concerns about Australians can be reported to the Australian Federal Police on 1800 813 784 or Child Wise on 1800 991 099.

\(^{15}\)’Plan associates’ refers to the field, National Organisations, International Headquarters and International/National Boards in relation to Plan’s Board members, volunteers, sponsors, employees, consultants, contractors and representatives of partner organisations/local governments who have been brought into contact with children while working for Plan.
victim is no longer harmed. An inappropriate response could leave the child prone to further abuse.

Reporting child safeguarding issues through the appropriate channels also creates a forum to discuss problems, access appropriate support, establish an appropriate response in the best interest of the child and consider the wider implications for the organisation as a whole.

Staff and others may be reluctant to report child safeguarding issues for many reasons. It is important to address these blocks to making a complaint through child protection training, awareness raising workshops and other forums like staff meetings and one-to-ones.

PI works in many countries where the situation of all or many children may be described as ‘abusive’. Many of these issues are being or should be tackled through program work. The PIA SCYPP does not require staff to intervene in the lives of children where abuse in occurring in the wider sense, as this is unrealistic. Rather, the policy looks at specific abuses at the level of the individual child. The procedures are to be used when a PIA staff member or associate is informed of, becomes aware of or suspects a specific incident of maltreatment of children by any person.

Note:

- These procedures apply to children (anyone under 18 years of age).
- These procedures must be used regardless of who the alleged abuser is.

**Discipline process for PIA staff and others**

**Personnel employed by Plan International Australia:**

**Failure to report**

All staff must internally report any concerns (including specific complaints and rumours) regarding possible child abuse and/or violation of the PIA SCYPP by a PIA staff member, associate and other persons external to PIA. Reports should be made even when the identity of the perpetrator is unknown. Failure to report may result in action being taken against the staff member or associate. This may include:

- Employees – disciplinary action/dismissal
- Partners – withdrawal of funding/support
- Contractors – termination of contract
- Other Plan associates – ending the relationship with the organisation.

**False or malicious reporting**

All reports made in good faith are considered to be in the best interests of the child, regardless of the outcome of any investigation. No action will be taken against any staff member who, in good faith, reports information indicating a violation of the SCYPP and applicable Code of Conduct (including reports that, on investigation, are unfounded). However, if a staff member knowingly and wilfully makes a false report, or gives false or malicious information regarding another
member of staff or PIA associate, PIA will take disciplinary action. This action will be decided by the Senior Management Team or Board (if necessary), in line with the Plan International Australia Discipline and Dismissal Policy.

When under investigation

PIA will investigate all child abuse allegations regarding PIA employees. The CSA is responsible for investigating such allegations with the Executive Team, who makes the final decision regarding what action to take.

Where the alleged perpetrator of child abuse is within the scope of PIA’s policy, they will be immediately removed from any contact with children involved in PIA’s activities and will normally be suspended without prejudice, on full pay, from their normal relationship with PIA during the investigation of the allegation. The decision to suspend should be supported by the information in the initial report or as a result of any fact-finding exercise which is undertaken to establish the exact nature of the complaint, concern or allegation (see Section 12, “Investigation”). However, if this involves delays and the person is in contact with children through their role, then a decision may be made to temporarily remove them from their duties pending the outcome of the fact-finding exercise.

Where a formal investigation is underway, removing a staff member from active duty until the investigation/formal follow-up is conducted is, for many reasons, a sensible precaution. Preparing for potential public relations issues and getting legal advice may be timely and require key people. Local legislation pertaining to labour matters must be complied with first.


Global Internal Resources

There are a number of Plan International staff who have been trained in carrying out administrative investigations (formal investigations) and case management. These staff represent an internal resource that may be deployed to support Country and National offices in dealing with a restricted range of safeguarding issues and incidents (see important note below). In addition, the Global Safeguarding Unit at IH retains the services of an independent investigation firm for significant safeguarding breaches which may require an independent oversight.

IMPORTANT Note:

It is important that all safeguarding concerns are reported and managed in line with existing procedures and guidance – both global and local HR disciplinary procedures and safeguarding reporting procedures.

The safeguarding reporting procedures require that where a safeguarding issue represents a breach of a country’s criminal code, it must be reported to the relevant national authorities (as identified through the process of local mapping and in line with local procedures) who are also responsible for formally investigating these issues.
When a safeguarding concern is reported, a basic fact finding exercise may be undertaken to establish the basic facts of the report which may need to be reported to the authorities and or which may be used to determine whether a formal internal investigation is required. This exercise may be termed a preliminary investigation but should not be confused with a formal investigation.

Formal investigations into safeguarding concerns should only be carried by trained individuals. The internal investigators can be deployed where assistance is required in basic fact finding or where a formal investigation is required for safeguarding policy concerns of a non-criminal matter, and/or where it is necessary to identify and address control weaknesses which may have allowed the policy breach. In some instances, the internal investigators may also carry out formal investigations into criminal matters where external reporting is not possible or the issue is not taken up by the external agencies.

The decision on which staff to appoint to carry out any investigation will be a decision of the PIA Executive Team.

Legally convicted of or admitting to child abuse

PIA will immediately sever all relations with anyone employed by PIA who is proven (generally by conviction or declaration of guilt) to have committed child abuse.

As part of PIA’s SCYPP, in the event an employee is dismissed for child abuse, PIA may disclose such information if requested by a prospective employer. Such disclosures are made in accordance with applicable laws, particularly privacy laws and/or customs.

Plan associates

If a PIA associate has a legitimate concern about suspected child abuse, which proves to be unfounded on investigation, no action will be taken against the associate.

PIA will take appropriate legal or other action against a PIA associate who makes false and malicious accusations of child abuse.

PIA will investigate all child abuse allegations regarding PIA associates, and the CSA is responsible for investigating these allegations with the support of the Global investigations team as required. The CSA and the ET will make the final decision regarding what action to take. The action may include monitoring, cancelling or refusing sponsorship and/or other support and partnership.

PIA will sever all relations with any PIA associate if they have adequate cause for concern regarding child abuse. The relevant department manager and the CEO are responsible for notifying the supporter in writing. PIA documents stipulate that “Plan International Australia reserves the right to cancel sponsorships/partnerships at any time without explanation”, so it is not necessary to mention the exact reason (i.e. suspicion of child abuse) for cancellation. It is unlikely that convictions have been made, and PIA would be left open to legal action. Copies of all such letters should be stored in a secure location by the CSA.

The CSA is responsible for monitoring supporters and would usually decide to undertake this action when sufficient evidence is not yet available. This action aims to minimise or prevent any risk to the sponsored child. Monitoring actions can include:
• Checking all sponsorship communications

• Not facilitating program country visits

• Not placing them in an environment where they have access to children, such as events, media opportunities and volunteering

• Monitoring media and relevant internet (public) databases for indications of conviction or further evidence

• Maintaining contact with the relevant field office and region office (who would have been notified during the investigation phase). Monitoring is an ongoing activity and any new evidence or information must be shared with the Executive Team so that the case can be reviewed.

PIA will sever all relations with any Plan associate who is proven (by conviction or written declaration of guilt) to have committed child abuse. The relevant department manager and the CEO are responsible for notifying the associate in writing. In such cases, it is acceptable to mention the exact reason for PIA’s actions. Copies of all letters should be stored in a secure location.

PIA will report all suspected and known cases of child abuse regarding a Plan Participant to the relevant authorities using the external reporting procedures outlined in the “Responding to child abuse and reporting” section.

Visits to the field

The Plan International Australia website, sponsorship welcome pack (which is sent to all sponsors) and the Visit Procedures (which is sent to anyone who expresses an interest in visiting a program country) all clearly state that all visits to Plan International program countries must be arranged via the Plan International Australia Office.

Therefore, any visitor who knowingly breaches the visit guidelines will be discontinued or refused partnership.

Any PIA staff member who knowingly avoids using the visit guidelines and/or procedures regarding police checks to facilitate an overseas visitor (outlined in the SCYPP) will have disciplinary action taken against them.

Consideration will only be given in circumstances where it can be proven that Plan International Australia has not fulfilled its duty to provide visit information to those who have expressed an interest.

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16 If you require further information or assistance when arranging a visit, see the ANO Region Coordinators or Child Protection Advisor.
As per AusAID’s Child Protection Policy, AusAID staff should have Australian Federal Police Checks.
If they are unable to provide a valid check, Plan will request the visitor/s have a Crimcheck background check undertaken prior to the visit.

For **Australian citizens living overseas**, this check should be obtained in Australia.

**Guidelines for requesting a Crimcheck background check**

As of 2012 only specific staff at Plan in Australia can arrange and process police checks. These staff members have been trained and authorised as **Crimcheck Users**.

**What is different?**

There are very specific legal requirements associated with running a background check via Crimcheck, therefore, unlike previous background check procedures, **PIA staff MUST NOT send out forms to an Applicant**, this must be undertaken by a PIA Crimcheck User only.

This means that when you request the PIA Crimcheck User in your department to run a background check they will:

A) Send /give the forms to the Applicant  
B) Liaise with the Applicant to explain how to complete the forms properly.  
C) Witness the Applicants ID and consent forms (or give alternative instructions regarding a community based authorised witness)  
D) Process the application via the Crimcheck database  
E) Confirm the results with you and the Applicant

**When do I put in a request?**

Approximately 95% of Crimcheck police checks are returned with an outcome within hours. However, this is not always the case, therefore **you must send a request to your departmental Crimcheck User, where possible, two weeks prior to the Applicant starting with PIA to avoid a delay in them starting with us.**

**Who is my Plan Crimcheck User?**

<table>
<thead>
<tr>
<th>TEAM</th>
<th>CRIMCHECK USER 1</th>
<th>CRIMCHECK USER 2</th>
<th>CRIMCHECK USER 3</th>
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</thead>
<tbody>
<tr>
<td>Executive</td>
<td>Gaye Wealthy (Administrator)</td>
<td></td>
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</tr>
<tr>
<td>People and Culture</td>
<td>Jane Leopard</td>
<td>Irfan Ali</td>
<td>Melanie Sleap</td>
</tr>
<tr>
<td>Programs</td>
<td>Molly Garcia Underwood</td>
<td></td>
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<tr>
<td>Supporter Services</td>
<td>Kris Murray</td>
<td>Rekha Srethsta</td>
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<tr>
<td>Corporate Services</td>
<td>Glenn Martin</td>
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</tbody>
</table>
Options for running overseas background checks

Plan International Australia can obtain international police checks through Crimcheck. PIA emails crimcheck who will forward the relevant country’s consent form to be completed and processed. Please note that international police checks require a longer lead time to be completed and so a four week lead time is recommended.

For details of how to apply for criminal record checks in other overseas countries, please refer to the Department of Immigration & Citizenship Form 47P


If in doubt, request further information from that country’s nearest embassy or consulate

Alternatively, you can ask either the People and Culture Department or the Child Safeguarding Advisor for assistance as we can also request assistance from other National and Country Offices.

Guidelines for running a Working with Children Check

Working with Children Clearances are to be used where PIA is facilitating programs that have volunteers or staff working in programs that have direct contact with children in Australia. Every state has a different card and process. For the two states we currently work in, Victoria and the Northern Territory, see below:

See here for an application form, information on how to apply and how to renew or update your working with children check in Victoria: http://www.workingwithchildren.vic.gov.au/

See here for information on how to apply for an Ochre card in the Northern Territory: https://www.pfes.nt.gov.au/Police/Community-safety/SAFE-NT.aspx

Employer and volunteer organisation obligations

PIA staff need to:

- Ensure that you do not engage a person in “child-related work” if they are required to apply for a Working with Children clearance check and have not done so by the due date.
- Ensure that employees or volunteers who are given a Negative Notice do not undertake “child-related work”, even if directly supervised.
- Ensure PIA complies with obligations to keep employees’ and volunteers’ information confidential as required under the Working with Children Act 2005 and any other relevant laws.

People and Culture Business Partners need to:

- Confirm that the employees and/or volunteers have passed the WWC Check.
• Sight the employees' or volunteers' WWC Check card as evidence that they have passed the WWC Check or sight and retain on file a copy of the WWC check letter confirmation

• Record your employees’ and volunteers’ WWC Check Number, which is different from their Application Receipt Number.

• If you engage a self-employed person who is required to pass the WWC Check, you should sight the person’s WWC Check card and check its status via the WWC Check website.

• Refer to the reporting guidelines in the event of an existing employee or volunteer being given an Interim Negative Notice or Negative Notice.

• If a new volunteer or staff member joins PIA with a WWC Check, the supervisor or manager must ensure the applicant lodges PIA with the Department of Justice. The supervisor or manager will need to give their contact details, including postal address, so that the Department of Justice can forward a letter of verification regarding the addition of PIA as an organisation associated with the Applicant’s WWC card.

**Cardholder obligations**

If you or an applicant holds a current Assessment Notice and WWC Check card, you/they must:

• Inform your employer, agency or volunteer organisation and the Department of Justice if you have a “relevant change in circumstances”, for example, if you have been charged or found guilty of a new relevant offence

• Inform your employer, agency or volunteer organisation in writing within seven days if you have been given an Interim Negative Notice or Negative Notice

• Return your Assessment Notice and WWC Check card as requested if the Department of Justice revokes your Assessment Notice after reassessment

• Return your Assessment Notice and WWC Check card if your Assessment Notice has been expired for more than three months and the Department of Justice requests that you return them

• Present your WWC Check card to your employer, volunteer organisation or the individual or organisation to whom you provide services on request or when applying for “child-related work”

• Keep your Assessment Notice and WWC Check card in a safe and secure place

• Not give your WWC Check card to anyone else

• Apply for a new WWC Check within three months of your card expiring.

**Guidelines for using a Child Safeguarding Self Disclosure Form**

The *Plan International Australia Self Disclosure Form* should only be used to replace criminal background checking in very exceptional circumstances. The form is normally signed by all staff as recognition of their agreement to adhere to the Safeguarding Children and Young People policy.
and code of conduct but to be used in the place of a criminal background check it must be witnessed by an authorized Justice of the Peace. This should only be used after a full investigation of the usual background check avenues has been undertaken but deemed not possible or applicable. A child safeguarding risk assessment must then be carried out and signed off by the relevant Executive Team member or senior manager and the CSA. Extra prevention and supervisory measures must be included as part of the mitigation measures.
Guidelines for child safeguarding and facilitating visits

Plan International recognises that visits by sponsors and donors to the field fulfil a number of objectives: accountability, development education, advocacy and fundraising. However, it is of utmost importance to PI that abuse is not perpetrated or compounded by people that PI puts in contact with children and in whom children place their trust. It is therefore essential that everyone understands the issue of child protection and their own role in protecting children, and that all practical and reasonable steps are taken to counter this risk.

There are several types of visitors and visits facilitated by Plan International Australia and partner countries overseas, and they can be broken down into two categories:

1. **Visits to projects and programs, including in Australia**

   Visitors in this category can be:
   - Sponsors (including friends and family)\(^{18}\)
   - VIPs (including government officials, celebrities etc)
   - DFAT staff and contractors (such as evaluation consultants etc)
   - Individuals from institutional or workplace\(^{19}\) donors
   - Individual donors (known as Major Donors)\(^{20}\)
   - School groups (only facilitated as part of established ANO/Country Office program for development education).

2. **Visits to Plan Country Offices only**

   Visitors in this category can be any of the above but are more likely to be:
   - VIPs (including government officials)
   - DFAT staff and contractors (such as evaluation consultants)
   - Institutional donors (large scale)
   - Individual donors (know as Major Donors).

**Note:** All Plan Participants travelling overseas must be briefed on the acceptable and unacceptable behaviour towards children in that context, and advised to adapt their behaviour as necessary\(^{21}\).

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\(^{18}\) Procedures were specifically designed for facilitating sponsor visits. These are managed by the Region Coordinators in the Supporter Service Team.

\(^{19}\) As part of Plan International Australia’s Workplace Giving Program.

\(^{20}\) The procedures were specifically designed for sponsor visits and also cover major and individual donors. These are also managed by the Region Coordinators in the Supporter Service Team.

\(^{21}\) However, no behaviour should violate Plan’s *Child Protection Policy and Code of Conduct*. 
Coordination within ANO

Prior to all non-sponsorship visits, the following staff and teams must coordinate:

- Relevant Marketing and Communications staff
- Region Coordinators in the Supporter Service Team
- Relevant program and management staff
- Chief Executive Officer as necessary.

Whilst it would be usual for Region Coordinators to facilitate police checking and visit arrangements for individuals, depending on their area of work, it would be more appropriate for other ANO staff to facilitate such measures for VIPs, DFAT staff and contractors, institutional donors and school groups. However, initially Region Coordinators should always be copied into any visit arrangements.

Police checks

All sponsors, donors and individuals (such as those visiting as part of a school or corporate/partnership visit) visiting communities in PIA-assisted communities must have or undergo a National Name or other relevant Police Check facilitated by PIA22.

All other visitors associated with a government department (including Australia-based and DFAT Post staff and consultants such as evaluators etc) or an institution, as well as support staff such as drivers and translators visiting communities in PIA-assisted communities, must be able to provide assurance that they have a valid Australian Federal Police23 Check or Nationally Coordinated Criminal History Report (a check is valid if it was run within the last 12 months). If they are unable to do so, Plan will request the visitor/s to have a check undertaken prior to the visit.

Note:

1. WWC Checks can be accepted, however, it is the responsibility of the Region Coordinator or other Plan staff members arranging the visit to check the WWC Check website for the status of the visitor’s WWC Check registration. (See “Checking WWC Check status” in the “Guidelines for running a Working with Children Check” section.)

2. Victorian Teachers Association (VTA) cards are not acceptable as they are valid for five years and do not have a monitoring mechanism.

NOTE: Hard copy (or scanned version of) any background check must be sent to the Child Safeguarding Advisor for filing

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22 Usually, police checks and visit logistics are facilitated by the Region Coordinators in the Supporter Service Team.

23 As per AusAID's Child Protection Policy, AusAID staff should have Australian Federal Police checks.
Child safeguarding policies and behavioural guidelines

All visitors to Plan International projects or programs (the field) must sign onto the Plan International Australia Child Protection Policy and Code of Conduct.

All visitors to the field must comply with local child safeguarding requirements when asked by overseas Plan International offices or officials.

Logistical arrangements

Prior to the visit:

All visits must be arranged as per the Visit Procedures when facilitating visits for sponsors and individuals.

The Plan International Guidelines for Sponsorship Visits have been designed to minimise any protection risk to children and ensure a safe and rewarding visit for all. Therefore it is advised that ALL visits to the field follow the procedures outlined as part of the aforementioned document24. Relevant points have been summarised below:

1. Both National Organisations (NOs) and Country Offices (COs) are responsible and accountable for ensuring successful, productive and safe visits by sponsors and/or other visitors to the field.

2. Visits must be arranged through NOs. NO staff shall notify the field at least six weeks in advance of the upcoming visit and, if possible, longer, to allow the field to make the necessary preparations. The NO should inform the CO of the nature of the visit so they can assess and make preparations accordingly. (Some COs may wish to prepare differently for a VIP or government visitor, for example.) Exceptions to the six-week rule should be rare and need to be discussed by the NO with the countries. There must be a clear and compelling reason for the exception, which should be documented. COs must make the final decision on whether the visit is feasible.

3. Unannounced visits will NOT be allowed. See “Unannounced Visits – Zero Tolerance”, below.

4. NOs shall conduct appropriate criminal checks on the credentials of all visitors as allowed by their local laws.

5. NOs shall inform the sponsors and/or other visitors who wish to visit about Plan International’s Safeguarding Children and Young People Policy and the Working with Children Code of Conduct. NOs shall ask the sponsors and/or other visitors to complete a visit agreement form, which includes an acknowledgement that they have read and understood Plan International’s Safeguarding Children and Young People Policy and the Working with Children Code of Conduct. NOs shall inform the field that this form has been signed. Some Plan International program countries may require visitors to sign their local Safeguarding Children and Young People Policy upon arrival. The NO should inform the visitor of this possibility.

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24 In some places, the term “sponsor” has been deleted, added or changed to “visitor” to make this section more relevant to non-Region Coordinator readers. Where this is the case, italics have been used.
6. The CO shall prepare (and regularly update) the Visitor Information Guide (VIG)\textsuperscript{25} that NOs can provide to visitors who wish to visit Plan’s programs.

7. Visits for large parties (five or more visitors) must be negotiated between the NO, CO and RO concerned to ensure that support and logistical arrangements are in place for the visit.

During the visit:

1. The CO/PU provides a short briefing to the visitors about Plan International’s operations and programs in the country or program area. This briefing should include information on local arrangements for child safeguarding and any requirements for sponsors regarding health and safety arrangements. It will also be helpful to the visitors to know about cultural norms or behaviours that are expected and accepted in the community, and also that Plan International is required to supervise the visits.

2. At least one member of staff is designated as chaperone for the visit (more may be necessary depending on number of visitors). The chaperone must accompany the visitor at all times during the visit to ensure it proceeds in line with these procedures.

3. At the end of the visit, the CO/PU may conduct a debriefing meeting with the visitor to get feedback, clarify matters as needed and/or respond to questions that may have arisen as a result of the visit.

Post visit:

1. The CO/PU sends a Visit Report to the NO. If the visit has not been positive, the CO/PU needs to contact the NO as soon as possible, explaining what happened and what issues the visitor may raise with the NO.

2. After the visit, the NO contacts the visitor to seek feedback on the visit. The NO may send feedback to the CO/PU where this provides additional information.

\textit{Unannounced visits – zero tolerance}

Most sponsors/visitors understand and respect Plan International’s measure to protect children. Occasionally, however, some sponsors do not.

Unannounced visits and any other visits that do not follow internal procedures represent a significant risk in terms of child protection and infringe on the rights of the child. Such visits are completely unacceptable. Unannounced visits often mean we have to seriously compromise the arrangements we normally make for visits and so undermine the protection we can offer.

Should a visitor arrive unannounced in a field office, the CO or PU staff should not pursue any visit to communities or sponsored children, but should follow the guidelines for unannounced visits outlined in the \textit{Plan International Guidelines for Sponsorship Visits}.

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\textsuperscript{25} Ask Region Coordinators for the copy relevant to your visit arrangements.
Requests for exceptions
Any request from NO staff, sponsors or sponsors’ friends for special exceptions to existing procedures for visits should be referred to the Director of Sponsorship and Grant Development at IH, who shall determine with the NO the rationale for the request and the importance of the visit. The Director of Sponsorship and Grant Development will consult with Global Safeguarding Unit colleagues and others, as necessary, prior to delivering a decision on such requests.

Guidelines for visits to the Country Office only (Category 2)
For visitors who are not visiting a Plan International community and only visiting the Country Office, the following guidelines should be followed.

Coordination within ANO
Prior to all non-sponsorship visits, the following staff and teams must coordinate:

- Relevant Marketing and Communications staff
- Region Coordinators in the Supporter Service Team
- Relevant program and management staff
- Chief Executive Officer as necessary.

Whilst it would be usual for Region Coordinators to facilitate police checking and visit arrangements for individuals, depending on their area of work and the nature of the visit, it would be more appropriate for other ANO staff to facilitate such measures for VIPs, DFAT staff and contractors, institutional donors and school groups. However, initially Region Coordinators should always be copied into any visit arrangements.

Police checks
All sponsors, donors and individuals (such as those visiting as part of a school, corporate/partnership visit) visiting communities in Plan-assisted project areas must have or undergo a Nationally Coordinated Criminal History Report facilitated by Plan International Australia.

All other visitors associated with a government department (including DFAT Post staff, consultants such as evaluators, DFAT personal etc) or an institution/workplace and their support people (such as drivers and translators) visiting communities in Plan-assisted project areas must be able to provide assurance that they have a valid Australian Federal Police Check. (A check is valid if it was run within the last 12 months.) Where a valid certificate cannot be assured, a new one must be run via the Australian National Police with results returned and passed onto PIA prior to the visit. See flowchart overpage for more guidance.

Note:

1. WWC Checks can be accepted, however, it is the responsibility of the Region Coordinator or other PIA staff members arranging the visit to check the WWC Check website for the status of the visitor’s WWC Check registration. (See “Checking WWC Check status” in the “Guidelines for running a Working with Children Check” section.)
2. Victorian Teachers Association (VTA) cards are not acceptable as they are valid for five years and do not have a monitoring mechanism.

NOTE: Hard copies (or scanned version of) any background check must be sent to the Child Safeguarding Advisor for filing

Child safeguarding policies and behavioural guidelines

All visitors must sign onto the Plan International Australia Safeguarding Children and Young People Policy and Plan International Australia Code of Conduct. All visitors must comply with local child safeguarding requirements when asked by overseas Plan International offices and officials.

Logistical arrangements

Prior to the visit:

1. Both National Organisations (NOs) and Country Offices (COs) are responsible and accountable for ensuring successful, productive and safe visits.

2. Visits must be arranged through NOs. NO staff shall notify the Country Office at least six weeks in advance of the upcoming visit and, if possible, longer, to allow the Country Office to make the necessary preparations. The NO should inform the CO of the nature of the visit (who the visitor/s are and the purpose of their visit) and if any special arrangements need to be made (meetings with particular staff or provision of certain documents, for example) so that they can assess and prepare accordingly. Some COs may wish to prepare differently for a VIP or government visitor, for example. Exceptions to the six-week rule should be rare and need to be discussed by the NO with the countries. There must be a clear and compelling reason for the exception, which should be documented. COs must make the final decision on whether the visit is feasible.

Post visit

1. The NO should request the CO to send them a Visit Report. If the visit has not been positive, the CO needs to contact the NO as soon as possible, explaining what happened and what issues the visitor may raise with the NO.

2. After the visit, the NO should contact the visitor to seek feedback on the visit. The NO may send feedback to the CO/PU where this provides additional information.
Guidelines for child safeguarding in partnership agreements and contracts

All Country and National Offices must adhere to the Plan International 13 implementation standards. All downstream partners must adhere to a reduced 10 implementation standards (as outlined in the CPP partner assessment tool) and at a minimum, the DFAT 9 minimum standards. The adherence to standards and capacity building requirements are ascertained through the Partner Capacity Assessment process and the Field Visit or Partner Audit Checklist conducted annually through monitoring visits.

Partnerships with Plan International Country and National Offices

All partnership agreements with Plan International Country or National Offices must reflect our global commitment to child safeguarding.

All partnership agreements (Grant Agreement Documents and supporting systems) with Plan International offices must include:

1) Commitment to child safeguarding as it is outlined in the Plan International Australia Safeguarding Children and Young People Policy and the Plan International Australia Working with Children Code of Conduct

2) Agreed minimum child safeguarding requirements that the partner will comply with in relation to the work they are engaged in with Plan International and an assessment of how these requirements will be met. This includes the following:

   ➢ A way to verify that minimum standards for child safeguarding in recruitment is being undertaken for all personnel (including volunteers) working on DFAT funded projects, including:
     • Background checks
     • Verbal reference checks with CP questions
     • Signed copies of the local Country Office Child Safeguarding Policy and Plan International Code of Conduct
     • Targeted CP questions in the interview processes

3. (If the project is DFAT funded) - agreement to share any information if any of the Organisation’s personnel is alleged to have committed, or been arrested for, or convicted of, criminal offences relating to child abuse or child pornography as well as any information relating to incidents of child abuse or exploitation within DFAT funded projects and activities.

In addition, as per the Plan International Minimum Standards for Child Safeguarding, when a new relationship (sponsorship or grant) is made between a National Office and Country Office, the Directors of the Country and National Offices must ensure their respective child safeguarding procedures on reporting are complementary. Any inconsistencies must be identified, resolved and confirmed in writing.
**Partnerships with external stakeholders**

As part of Plan’s commitment to maintaining child safeguarding, Plan International Australia must ensure that those organisations with whom we are working to increase our impact have a commitment to child protection.

In line with our global Plan International Minimum Standards for Child Safeguarding external partners are considered those organisations with whom we are working collaboratively to increase our impact e.g. NGOs, Government bodies or funders and companies and organisations that will have direct contact with children or access to children’s data or images.

PIA must proactively determine if existing or potential partners have their own child safeguarding policy that includes a child safe recruitment process. If a partner does not have a child safeguarding policy, PIA must ask partners to sign onto PIA’s Safeguarding Children and Young People Policy and Plan International Australia Working with Children Code of Conduct and other relevant child safeguarding documents. It may be also necessary for partners to sign onto PIA’s Safeguarding Children and Young People Policy if their own policy does not meet the same standards as Plan’s. This will be determined on a case-by-case basis by the relevant departmental manager and the CSA.

**All external partnership agreements/contracts**

All external partnership agreements/contracts must include:

- If partner has their own child safeguarding policy and it is in line with PIA’s Safeguarding Children and Young People Policy then reference to child safeguarding as it is outlined in both policies and the Plan International Australia Working with Children Code of Conduct must be reflected in all partnership agreements/contracts – see the child protection section used in the consultant companies or sole trader contract template.

- If a partner does not have their own policy then PIA’s Safeguarding Children and Young People Policy and Plan International Australia Working with Children Code of Conduct must be reflected in all partnership agreements/contracts - see the child protection section used in the consultant compagnie or sole trader contract template.

**All external partnership agreements where personnel work directly with children or have access to children and children’s data (including Plan International's image bank)**

If partners need to or have access to and/or manage child sensitive data, they should be vetted appropriately to ensure they are credible and able to guarantee the security of data held before being covered by a contract. Access to Plan International information should not be granted until the contract has been signed.

In addition to including a statement regarding commitment and adherence to the PIA’s Safeguarding Children and Young People Policy and Plan International Australia Working with Children Code of Conduct and actions taken for any breeches, all external partnership agreements where personnel work directly with children or have access to children or children’s data (including Plan International's image bank) must include:
1) Agreed minimum child safeguarding requirements that the partner will comply with in relation to the work they are engaged in with Plan and an assessment of how these requirements will be met. This includes the following:

- Child safe recruitment, including a way to verify that minimum standards for child protection in recruitment is being undertaken for all personnel (including volunteers) working on AusAID funded projects, including:
  - Background checks
  - Verbal reference checks with child protection questions
  - Signed copies of the Child Protection Policy and Plan in Australia Working with Children Code of Conduct (or the partners own policy if deemed appropriate and in-line with Plans)
  - Targeted CP questions in the interview processes

- Agreement on non-disclosure and data protection

- Agreement on relevant child safeguarding procedures such as informed consent and joint reporting protocols

- (If the project is DFAT funded) - agreement to share any information if any of the Organisation’s personnel is alleged to have committed, or been arrested for, or convicted of, criminal offences relating to child abuse or child pornography as well as any information relating to incidents of child abuse or exploitation within DFAT funded projects and activities.

- Agreed strategies for how (if relevant) PIA will support the partner with the necessary resources to develop their own child safeguarding policy and procedures.

- Agreed strategies and plans to improve child safeguarding practices with PIA support.

In addition, Plan International Australia and their partner must ensure their respective child safeguarding procedures on reporting are complementary. Any inconsistencies must be identified, resolved and confirmed in writing.

Recruitment and screening procedures

Any organisation that works with children needs to be vigilant when recruiting staff and volunteers. PIA has a duty of care to the children we work with which includes undertaking robust screening and recruitment procedures to ensure we recruit personnel who will uphold children’s rights at all times.

It is an unfortunate reality that child sex offenders target organisations that are unaware of the risks and dangers of child abuse. They are also attracted to organisations that conduct little or no screening and those that provide opportunities to make contact and be alone with children. The majority of sex offenders look and act like everybody else. By far, the majority do not have criminal convictions and are often extremely clever at presenting themselves as caring and trustworthy individuals. Indicators of abusive behaviour, however, can emerge through inappropriate attitudes
or inconsistent reactions. The recruitment and selection process provides some important first-point-of-engagement opportunities to deter an offender and highlight aspects of concern for potential employees.

Promotion of PIA’s open and aware culture – where staff and volunteers can discuss child safeguarding and are aware of the issues involved – should occur throughout the recruitment and selection process.

PIA will not permit a person to work with children if they pose an unacceptable risk to children’s safety or wellbeing.

Child Safeguarding is included in a range of relevant human resources documents covering all types of engagement with PIA.

Specific actions include:

- Conducting criminal record checks
- Including a child protection statement in job advertisements or initial email correspondence
- Using self-disclosure forms (if no background check is possible)
- Reference checking
- An interview (with behavioural questions if having direct contact to children or access to children’s data)
- Signing onto the Plan International Australia Safeguarding Children and Young People Policy, Plan International Code of Conduct and or Plan International Australia Working with Children Code of Conduct
- Child safeguarding induction and follow-up training (as necessary)
- A child safeguarding clause in the contract
- Child safeguarding included in staff appraisals
- When third parties have access to and/or manage child sensitive data, they should be vetted appropriately to ensure they are credible and able to guarantee the security of

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26 If the applicant is from overseas, see the Department of Immigration & Citizenship Form 47P http://plan.intranet/development/Childprotection/Documents/character-penal.pdf. If in doubt, request further information from the nearest embassy or consulate for that country.

27 The reference check contains the following child protection–related questions: a) Did you ever have any reason to be concerned about this person’s behaviour with children? b) Were there ever any complaints from staff, children or parents about this person (regardless of whether they were substantiated)?

28 Follow-up training should be within six months of joining. Induction and training is supported by the ANO CPA.

29 That includes non-disclosure and data protection plus the consequences of a breach.

30 Someone other than Plan.

31 For example, examining, evaluating services and performance, and performing a background check on the party.
data held, before being covered by a contract. Access to Plan International information should not be granted until the contract has been signed.

- Child safeguarding guidelines appropriate to the type of engagement should be part of the contract (such as reporting, informed consent guidelines)
Part 4: Departmental guidelines
Management responsibilities and child safeguarding

Plan International Australia management staff (including directors) have specific child safeguarding responsibilities. It is crucial to have support from this leadership level and maintain the ongoing management and supervision of all child safeguarding measures.

It is the responsibility of the Board/National Executive Director, through department directors, to ensure they and all Plan Participants in their area of responsibility:

- Are aware of, understand, sign onto and agree to abide by the Plan International Australia Safeguarding Children and Young People Policy, Plan International Code of Conduct, Working with Children Code of Conduct and other applicable local procedures (including this implementation document), and that compliance is monitored

- Report any child abuse and safeguarding concerns. This is a mandatory requirement and failure to comply may result in disciplinary action.

- Respond to a child who may have been abused or exploited in accordance with applicable local office procedures

- Cooperate fully and confidentially in any investigation of concerns or allegations

- Contribute to an environment where children are respected and encouraged to discuss their concerns and rights.

Supervision

Supported by the Child Safeguarding Advisor, Directors and Board members, should ensure all staff and volunteers are supervised; are provided with support and guidance; and maintain accountability in relation to child protection.

Staff responsible for supervising/managing other staff should ensure:

Management responsibilities

- Staff with specialist responsibilities under the CPP and related procedures are provided with appropriate and detailed courses to support their responsibilities.

- Child safeguarding is included in their regular risk management processes. This should be detailed, documented and encourage continuous improvement of risk mitigation.

- Staff, consultants, contractors and volunteers and other associates are concerned about the perception and appearance of their language, actions and relationships with children. They should seek to maintain Plan’s professional reputation and uphold the principles of and abide by Plan International Australia’s Safeguarding Children and Young People Policy and Working with Children Code of Conduct in all instances.

32 This may be as a result of witnessing an incident or hearing a disclosure, suspicion or rumour of child abuse, a child at risk of poor practices or procedures that may lead to a child being placed at risk of harm. It may be current or related to a historical event. See Ensuring Child Protection – Plan in Australia Child Protection Procedures for further guidance on how to make a report.

33 Each Plan office will have its own local child protection procedures.
• Staff, consultants, contractors and volunteers and other associates are aware of situations that may present risks and manage these in consultation with their supervisors, managers and the Child Safeguarding Advisor. They should plan and organise work/the workplace with the aim of minimising risks.

• Staff and volunteers empower children – talk to them about their rights; what is acceptable and unacceptable; and what they can do if there is a problem.

• A culture of openness exists so issues or concerns about inappropriate behaviour or abuse can be raised and reported.

• There are regular opportunities to discuss concerns about poor practice. Poor practice should be reported, monitored and challenged.

• All Plan Participants visiting program countries have a valid background check, understand and commit to adhere to Plan International Australia Safeguarding Children and Young People Policy and Working with Children Code of Conduct (via a signed or email statement). Also ensure they understand and adhere to related procedures and policies (especially the Sponsorship Visit Guidelines).

• Child safeguarding procedures represent best practice, are current and up to date.

• The SCYPP is reviewed every three years.

• There is always a designated CSA in the Plan International Australia office.

• Staff involved in and affected by child protection issues are allowed to debrief with their manager or the Child Safeguarding Advisor. If a staff member feels the debrief with Australian National Office (ANO) staff does not meet their needs, they can seek professional counselling services.

Prevention (general)

• All key child safeguarding documents are widely publicised. Include versions in child-friendly language.

• Training needs are identified and implemented.

• Advocacy for child rights and protection is encouraged and resourced.

• Child safeguarding is seen as a cross-cutting issue and is integrated into all activities.

• All child safeguarding training, workshops and other information-sharing events are evaluated to review whether the level of understanding and practice has improved and to monitor attitudes and perceptions. Evaluations should inform future events.

Prevention (specific circumstances)

• There is a comprehensive sponsor pre-visit and post-visit procedure. Ensure all checks and systematic recording mechanisms are in place and being used.
• All Plan participants travelling overseas are briefed on acceptable and unacceptable behaviour towards children in the context of their work and are advised to adapt their behaviour as necessary\(^\text{34}\).

• A risk assessment is done for all projects, programs, events and activities involving children and young people, and appropriate levels of preventative care are taken\(^\text{35}\).

• Child safeguarding is part of all partnership agreements and contracts.

Recruitment, selection and screening

• The recruitment procedure is based on best practice in relation to child safeguarding and includes reference checks and a criminal record check. Staff members, consultants, contractors and volunteers may only begin working in their position once the form is returned with “no disclosable outcomes”. If a check is delayed, undertake an adequate risk assessment and implement mitigation activities to ensure they have no access to children (including overseas visits) or their personal information until the check is returned clear.

• Senior management and recruiting staff use a range of selection measures and pre-employment checks for all Plan Participants

• PIA’s Safeguarding Children and Young People Policy and Code of Conduct and Ensuring Child Protection – Plan International Australia Child Safeguarding Procedures are part of the induction given to all new staff, volunteers and other relevant associates.

Marketing communications and media

• All marketing and communications guidelines, as outlined in Ensuring Child Protection – Plan International Australia Child Safeguarding Procedures, are followed in all instances.

• Media visitors are briefed on and sign the Plan International Australia Safeguarding Children and Young People Policy and Working with Children Code of Conduct and media guidelines, and are accompanied by a PIA staff member or associate during their visit\(^\text{36}\).

• PIA suppliers and contractors provide an acceptable degree of privacy and protection when working with Plan International information and marketing materials outside the Plan International Australia office.

Emergencies

• Emergency response work is carried out according to the SCYPP, internationally agreed principles, and codes for humanitarian assistance and protection.

\(^{34}\) However, no behaviour should violate Plan’s Child Protection Policy and Code of Conduct.

\(^{35}\) This not only includes development programs but any activity where a Plan Participant could be in direct contact with a child/children or have access to a child/children’s personal information. This includes activities such as Marketing and Communications events, ICT projects that engage children and Direct Dialogue fundraising programs.

\(^{36}\) This can be a staff member from Plan in an overseas office, as arranged in partnership between Plan in Australia and partnering Country Offices.
Child safeguarding and sponsorship – guidelines for the Donor Services Department

PIA’s sponsorship program is a major part of our work. Facilitated by PIA’s sponsorship program, sponsors, children and their communities build positive relationships through letter writing, photographs, gifts, reports and news articles in PIA publications. PIA also accommodates sponsors to visit their sponsored child and community. Without child safeguarding policies and procedures, such a program leaves children vulnerable to abuse and exploitation.

Therefore, the following procedures have been formulated to ensure the safety of, specifically, children, but also Plan participants.

The Donor Services Department must ensure the following guidelines are implemented:

- The Donor Services Team (DST) will monitor repeat pre-assignments and will not send out more than two Sponsor Child Information Sheets (SCIs) to a prospective sponsor. The original should be returned to PIA first.


- Sponsor visit procedures must be followed and monitored for visits to program countries (excluding PIA staff visits). Refer to “Sponsor visits to the field” later in this section.

- Plan International Australia must build and foster good working relationships with support field staff and encourage them to report repeat, unannounced and unauthorised visits as well as inappropriate behaviour of Australian visitors. Staff should be appropriately briefed on PIA’s zero tolerance to unannounced visits. Unannounced visits must be treated and reported in line with the Sponsor Visits to the Field Policy.

- Documentation and personal information relating to children and sponsors is confidential and must be kept safely.

- PIA will not facilitate special preferences for sponsorship such as children who are orphans, children with disabilities etc. This is a privacy and safety issue for children. DST staff should explain to prospective supporters that PIA does not have access to such personal information as we do not record it on SCIs and to do so would breach the child’s personal privacy.

- No visitors to the Plan International Australia office or prospective sponsors are allowed to read SCIs when choosing a sponsored child.

- A child safeguarding statement is to be included in all new sponsorship materials as they are being developed.

- Donor Services staff involved in, and affected by, child safeguarding issues will be allowed to debrief with their manager or the Child Safeguarding Advisor. If a staff member feels that the debrief with ANO staff does not meet their needs, they can seek non-Plan assistance from professional counselling services.

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• It is important that Donor Services staff feel supported and equipped to deal with cases they are presented with spontaneously in their work on the telephone. Accordingly, a matrix of concern has been developed to assist staff to educate and escalate concerns. Escalation of concerns will involve consultation and appropriate mechanisms for flagging constituents who pose a potential risk to children in the CRM. See details in the Donor Contact and Services process document: https://planetoz.plan.org.au/collaboration/SupporterProcessKnowledgeBank/Documents/Procedure%20-%20Child%20Protection%20with%20SupportersV4.docx

• Sponsors are informed, in writing, of any relevant complaints procedure.

• On initial contact with PIA, sponsors receive information referring them to our SCYPP and preventative procedures, particularly as they relate to correspondence, use of the child’s image, information on personal websites, visits to the child and the consequences of failure to follow these requirements. Sponsors acknowledge and commit to following these guidelines when they sign up.

• Sponsoring a child from the same or nearby country of residence will not be permitted. Visits to the child and their community could take place without following Plan procedures, and facilitating such a request poses a high level of risk to children and their communities. While the Plan visit procedures could be followed for the first visit, due to geographical location, an individual could then re-visit without following proper procedures. This would be a child protection risk that also burdens the Country and Program Unit Offices of that country.

• No exchange of contact details should take place between a sponsor and the child they sponsor during the life of sponsorship. Upon graduation of the sponsorship, ie when the sponsored child (SC) reaches 18 years, approval of requests for contact detail exchange are the exception (based on a risk assessment, which includes the relationship to date, and frequency and reciprocity of contact) and must agreed upon by the appropriate senior management37 at NO, IH and CO level. Where continued contact is approved, PI informs the graduated SC and their family about the implications of the continued relationship, its risks and its potential. Then final approval for contact is obtained from the graduated SC.

• PIA will not permit an overseas-based donor or institution to sponsor a child in the same country or a nearby country. Such a request poses a high level of risk to children and their communities because visits to the child and their community could take place without following PIA procedures. While the PIA visit procedures could be followed in for the first visit, due to geographical location, an individual could then revisit without following proper procedures. This would be a child safeguarding risk and would also burden the Country and Program Unit Offices of that country.

37 As a minimum, this should include Senior Managers in Sponsorship and Child Protection.
Marketing and Communications guidelines

Including direct dialogue, major donors, corporate supporters and sponsorship communications.

This section also includes informed consent

We are all responsible for the protection of children’s rights. The UN Convention on the Rights of the Child asserts that every child has the right to privacy and this extends to the right not to have their image used for any purpose for which they have not given consent.

In all marketing and media activities, we must take every precaution to protect children from harm and exposure to risk. We must make every effort to ensure the way we represent children in our marketing materials and media is done in a way that upholds their rights and personal dignity; follows PIA’s child safeguarding and data protection policies; and accords with PIA’s child-centred community development ethos.

These guidelines explain PIA’s requirements for using images of, and information about, children in any media or communication publication, both internal and external. In this context, media publications include all print media (books, reports, newspapers, press releases etc), broadcast media (television, radio etc), and electronic or internet media (web, streaming, multimedia etc).

Note: To ensure consistency in child safeguarding approaches, please share these guidelines with all graphic design contractors.

Obtaining images

On image-capture assignments, photographers and videographers should be accompanied by a PIA staff member and all photo sessions must be supervised. The staff member has a key role in ensuring children are protected and it is their responsibility to obtain consent forms from the children being photographed.

Use of children’s images and personal information

Using children’s images and personal information can help us share their stories. However, if done the wrong way, we can also put them at risk. The following guidelines help to ensure our research, marketing and communications activities do not place children at risk.

- Wherever possible, children must be named, particularly in photographs of individuals or small groups of children. Note: There are exceptions to this guideline, for example in mass media promotions such as billboards. The Media and Communications team in the ACE Department, in liaison with the Child Safeguarding Advisor, will address these examples on a case-by-case basis.

- Only use dignified and respectful images. Children should not be presented as victims or in a vulnerable or submissive manner.

- Images of children should not be used if they do not include relevant and appropriate context to PIA’s work or the activity they are partaking in. All photographs must be
accompanied by a relevant and correct caption. Where possible, it must mention the subject’s first name only.

- Only use images of children that are relevant to the textual context. For example, a photograph of a child should not be used to promote education if it is unknown whether they are receiving an education or attending school.

- Images accompanying stories of specific projects should be of the mentioned project. Otherwise, a disclaimer-type narrative is necessary.

- Prior to taking photos, assess the local cultural/social traditions regarding taking photos. These may include taboos against taking photos, and presenting people undertaking particular activities or grouped in certain ways. If you are unsure, consult Plan International field staff.

- Children should be adequately clothed in photographs. They should not be in poses that could be interpreted as sexually suggestive.

- Plan Participants should be aware that the internet is a vast, unregulated space and that images may be taken and used in other contexts that are not in the best interests of children and that deny their protective rights. A risk assessment of any activity that involves the use of children’s images should be undertaken and preventative measures should be put in place accordingly.

- Promotion that lends itself to the concept of “selling children”, ie being able to choose a child to sponsor based on their appearance, is not acceptable.

- Personal or physical information that could be used to identify the location of a child/children within a country should not be used on a PIA website or in any other form of communication about a child. Do not use community names or locality maps of specific communities. Do not use a child’s surname or school name. Only use a child’s first name, Program Unit area and or country name.

- Avoid paternalistic images portraying PIA and/or sponsors as the “providers”.

**Informed Consent**

As a general rule of law, the person who is the subject of a photograph or video recording has the right to object to the use of their image being published or broadcasted (despite the fact that they may not own the intellectual property rights). You must therefore ensure that you obtain the consent of the person being photographed or filmed to be able to use their images. Consent must also be sought when interviewing a child for research, media, marketing or any other purpose. In addition, consent must be sought for the use of the content from the interview in any research, media or marketing publication.

As images and case studies are often shared between separate parts of Plan International, you must ensure that the person also consents to their images being used by PI in any country in the world and in any form of media.
Consent in this context means informed consent. An individual must understand and acknowledge what they are giving consent for. In many circumstances, a child cannot give informed consent so it will be necessary to obtain the consent of the child’s parents or guardian.

All child subjects in Plan International Australia-generated research, communications and marketing materials, where Plan Participants have interviewed/collected personal stories, filmed or taken photographs, should have signed a consent form or had a parent or guardian sign it on their behalf.

The contents of this form, the nature and possible distribution options (e.g., location of the media, promotional material, research material etc) must be explained to the child and/or their parent/guardian in their local language before they sign the form. See


Where possible, negotiate with field staff to assist with translations so that a copy of the signed document can also be provided to the subject in their local language.

In some circumstances, it may not be possible to obtain the informed consent of a parent or guardian of the child. If this is the case, you may have to consider whether a responsible, independent third party (for example, a school teacher or doctor) could explain the consent process to the parent/guardian and the child, and why their consent is required. They should state that the image may be used in any country in the world and in any form of media, and ask that the parent/guardian and child say that they understand and give their consent.

In all cases, it must be explained to the parent/guardian and child that they are not under any obligation to agree to the use of the images. If consent is not obtained, the image cannot be used.

Note that these requirements may conflict with the self-interest of PIA’s contractors. For example, a photographer may be commissioned to take a set number of photographs for PIA. If that contractor takes photographs of a group of several children, the photographer may not be willing to spend as much time speaking to those children and their parents to ensure that consent has been obtained.

For this reason, all photographers must be accompanied in the field to ensure that consent is obtained. A PIA representative must work with the photographer or videographer to ensure the children in the images are identified and the necessary consent is obtained.

Final copies of materials should be sent to the relevant P1 field staff (Communications/Building Relationship Officer) and include a copy for each person referred to in the communication.

Using images from the Global Image Bank is acceptable in the short term. The Media and Communications Team in the ACE Department has created a bank of images and photographs to help you meet the above guidelines.

**Occasions when children’s consent is not needed**

As a general rule, all children who are the subject of a photograph or video recording will need to give PI their consent. However, this is not always the case. Photographs or footage of people in a street scene do not need consent for the image to be used. This is because the image has been taken in a public place and the people in the image are not the direct subject. In this case, the street is the subject of the image and the people in it are merely incidental to that scene.
Equally, there is a distinction between a photograph or footage of one or two children who are required to give consent and an image of a large number of children who are not required to give consent. This distinction lies not in the number of children but rather whether the children are aware that the image is being taken and if the children are in a public place or not.

For example, consent is not needed for an image of a group of children playingunawares in the street because the children are in a public place and they are not aware that a picture is being taken of them. However, a group of children playing in a school playground will need consent because their image has not been taken in a public place.

There is a fine distinction as to when consent is required. The distinction is often difficult to gauge and will be different in every circumstance. Generally, the consent of all the children photographed and filmed should always be obtained.

**Transitional provisions**

While PIA is working towards a comprehensive database of content that has 100 per cent consent, the global image/film bank will still need to be used because many of the photographs and footage on PI’s image and film banks do not have the requisite consent referred to in these guidelines. These photographs and footage may still be used but care should be taken as to how they are used in the context of the issues and requirements highlighted in these guidelines.

**Use of language**

- PIA’s communication materials should not use language that disempowers, embarrasses or disrespects a child. This includes slogans like “Give them hope”. All language should be positive, real, engaging and empowering. Children and their communities must be represented as capable people, working in partnership with PIA.

- Language that implies a relationship of power should be avoided.

- Always attempt to use the voices/writing of children and communities rather than speaking on their behalf.

- Sponsors should be positioned as partners, not saviours or celebrities.

- Do not label children. For example, do not label children as orphans or disabled. See ANO editorial guidelines for further guidance.

- When talking about children in publications, introduce them personally, eg Four-year-old Carlotta from Guatemala.

- Do not use the fact file formula:

  NAME: Carlotta
  SEX: Female
  AGE: 4
  Place of birth: Guatemala

**Note:** The exceptions to this are Sponsor Child Information Sheets (SCIs) and Sponsor Child Updates (SCU).
Plan International Australia Brand Manual

The Plan International Australia Brand Manual is an important document that supports child safeguarding. It includes specific guidelines designed to ensure child protection is considered in our communications and public appearance: https://planetoz.plan.org.au/externalengagement/CommunicationsTeam/Documents/Plan%20International%20Australia%20Brand%20Manual_Final%202018.pdf

Media

Staff and associates with responsibility for media work should receive specific training. Prior to any events/media activities PIA must provide a briefing to the media on children’s rights and PIA’s commitment to child protection.

When arranging a media visit to the field PIA must ensure that members of the communications, publicity and media teams (including celebrities) undergo the routine pre-visit arrangements (i.e. are appropriately checked and receive pre-visit materials and briefings on the SCYPP, COC and media visit guidelines


Media visits must include a PIA member of staff or associate whose role includes ensuring PIA’s child safeguarding guidelines are fully understood, signed and followed.

PIA staff must ensure that the best interests of the individual child on issues of protection are always prioritised over the opportunity for advocacy or media coverage on child rights and children’s issues.

Children in contact with the media

The Plan International Media Visit Guidelines should be followed when arranging media visits.

Before any media contact with children is facilitated or arranged by Plan International Australia, the children involved should be briefed about what will take place and provided with basic media training (if appropriate) to ensure they are presented fairly and in an informed fashion in subsequent print, radio and/or TV coverage. PIA staff will need to provide this support to Australian children engaged in PIA media activities and may need to provide field colleagues/chaperones with resources and information for children from program countries that are engaged in PIA media activities.

Children must be provided with a supported environment that empowers them, if they so wish, to:

- Refuse comment
- Refuse to have their photograph taken
- Refuse to have their story told on their behalf.

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Identifying children in media publications

One of the fundamental rights of the child is the right to a name. This must be balanced with PIA’s policy on child safeguarding to prevent a child’s identity falling into the hands of those who may wish to harm that child.

Children who have experienced violence, exploitation, abuse or are in some way vulnerable or at risk, if identified, should not have their faces displayed or be represented in any way that may lead to their identification. Their names and location should also be concealed.

In general, a child’s real name should not be used in media publications or broadcasts, or, if it is (for example, where it is considered that a child would benefit from increased self-esteem by seeing their name in print), the published information should not allow for the identification of their precise location (either directly or indirectly).

For example, a child’s identity and location could be discovered if an image of a child is published or broadcasted showing the name of his or her school and location.

When false names are used, the media should refer to the fact that names have been changed.

Use of images by others

The following information must accompany any images provided by Plan International Australia to reporters, photographers or media companies in general:

“Images provided by Plan International may only be reproduced if they accompany a story about the PIA project or PIA-supported community portrayed in the image, or if permission has been given by PIA to use the image to illustrate a story about a related issue. Images must also have captions that explain the context of the image and acknowledge Plan International as the contributor. To comply with PIA’s Safeguarding Children and Young People policy, full names of children or exact geographical locations should not be published. Please ensure this detail accompanies any images filed in image banks and media databases.

Contact: PIA Media Manager

Note: The above statement should also be applied to:

- Designers (who must also adhere to the PIA’s Brand Manual)
- Direct approach companies (who have clauses in their contracts relating to the design of their own materials)
- Friends of PIA groups and PIA Community Representatives.

Privacy and security issues

In the same way we take measures to ensure the privacy of staff and supporter details, we must ensure that children’s privacy is also respected. Therefore, the following guidelines should be followed at all times:

- Personal or physical information that could be used to identify the location of a child/children within a community should not be used on a PIA website, in marketing
materials or in any other form of communication about a child. Do not use community names or locality maps, or the child’s surname.

- In the case of a child/youth reporter, the last name can be given to acknowledge who wrote/produced the product but no other identifying information can be given. For example, “Joe Bloggs from Australia” is appropriate but “Joe Bloggs from Sunshine, Victoria, Australia” is not appropriate.

- Publicising a traditional Sponsor Child Information sheet (SCI) with a child photo and personal/community details for marketing purposes is not acceptable. Mini SCIs are acceptable.

- Using images of children known to be living with HIV or AIDS; or working in exploitative labour conditions such as the sex industry, bonded labour, etc, to promote children living in especially difficult circumstances without their personal or parental/guardian written consent is not acceptable. Using file copies of silhouetted or back shots where identities cannot be recognised may be used on a case-by-case basis after consultation with the Child Safeguarding Advisor or relevant Program Manager.

- All SCIs and children’s information must be stored securely.

- Before contacting an external contact (sponsor, supplier, celebrity, VIP etc), check CRM for their history with PIA. Follow up any records of complaints or questionable behaviour with the relevant staff member and, if necessary, the Child Safeguarding Advisor.

- Third parties who have access to and/or manage child sensitive data should be vetted appropriately to ensure their credibility and ability to guarantee the security of the data, before being covered by a contract. Access to PI or PIA’s information should not be not granted until the contract has been signed.

- Child safeguarding guidelines, appropriate to the type of engagement, should form part of any contract (eg global media guidelines on the use of children’s images).

- If you store an image with details of the subject (ie the name and address of the child), that data is “personal data” and may be subject to data protection laws. This will usually mean that the information may only be kept for as long as is necessary and it may not be used for any purpose other than that which it was intended to be used for.

- Once consent forms have been signed, they must be stored in a secure manner for reasons of confidentiality and data protection. However, they must also be readily available should the need arise for PIA to show that a child has given consent. They should be kept in such a way as to allow the images to be married with the consent forms. Consent forms must be kept for as long as the image is used, which is usually five years.

- Consent forms should never be shown to a third party.

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38 Someone other than Plan.

39 For example examining, evaluating services and performance, and performing a background check on the party.
Working with field colleagues

To ensure PIA’s project information is authentic and that we have gained consent for using information about children in marketing materials, please follow these guidelines:

- Undertake appropriate planning. Provide enough time to share draft copies of marketing materials with field staff and subjects so they can comment and value add before they are published. If necessary, allow time for editing.

- Send final copies of mass marketing materials to relevant PI field staff (Communications/Building Relationship Officer) and include multiple copies so they can be distributed to the people referred to in the materials. Informed consent for such use of photographs and written content should already have been sought and given. In addition, when there are case studies being used in general marketing materials (appeals, supporter communications etc), the relevant field staff or PIA program staff should sign off on the content or assist with gaining informed consent.

- When approaching field or country office staff for information, adequate time (a minimum of one month) should be given to allow them to schedule it into their work plan and for subjects to find appropriate time to contribute.

- Where possible and appropriate, request that children speak for themselves.

- Consider the subjects’ culture and lifestyle. Think about the issue you are asking them to speak about. Is it culturally acceptable for them to do so? Is it age and gender appropriate? Realistically, how long will it take them to respond?

Partnership agreements and contracts

PIA should only enter into partnerships with donors, companies and institutions that share the same level of commitment to ensuring children’s protection rights. Therefore, child safeguarding should be a part of all partner agreements and contracts. See the Guidelines for Child Protection in Partnership Agreements and Contracts section. In this section there are guidelines for developing partnership agreements for partners and suppliers, with specific guidance for those who are working directly with children or have access to children or children’s data in the Please follow these guidelines for all potential and existing partners and suppliers.

In addition:

- PIA staff should not send images of children to suppliers or contractors who have not signed a contract or a Terms of Agreement document that incorporates child safeguarding.

Recruitment of consultants and contractors

There are guidelines for recruitment in the Recruitment and Screening section. Please refer to these when recruiting any personnel.

Social networking media

The benefits of using social networking (Facebook, Myspace, Twitter etc) for communicating are well known. The speed and convenience of such media, and the number of new forums available
to engage people and issues globally, is ever changing. As a contemporary global organisation, Plan uses a number of social networking forums to share our work. In addition, we know that our supporters also use the same forums for the same purpose. Plan acknowledges and understands that the internet is a vast and unregulated space, and this poses potential risks for the children we work for.

Therefore, we are obliged to ensure all measures are taken to control what we place on our own social networking site and to undertake an educative role to help make our supporters more aware of the potential risk to children that such sites can pose.

Accordingly, PIA must undertake the following:

- Consider child safeguarding risks when developing or adding content to PIA social networking sites
- Monitor inbound traffic where external sites publish links back to PIA (known as referring sites)
- Monitor Google Alerts where there is a published mention of PIA
- Follow up with external sites and supporters when a concern has been identified regarding the use of PIA-assisted children’s information
- Develop, integrate and implement educative activities regarding the dangers for children when sharing information about them on social networking sites
- Invest in research on child protection and social media

In addition, PIA should commit to:

- Advocating for more child safeguarding initiatives and self-protective measures that protect children in PIA-facilitated ICT programs
- Advocate for a global PIA policy on social media
- Increased budgeting to improve ways of monitoring risks to children via social media.

**Child safeguarding statements**

Child safeguarding statements must be shown on all relevant PIA materials, including:

- The PIA website, including the *Child Safeguarding* and *Sponsorship Sign Up* pages
- PIA’s contractual documents
- Sponsorship and marketing materials.

The following example could be used:

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*With the internet so easily accessible, sponsored children could also contact their sponsors via their social networking sites. This should be included in the ANO educative material and systems should be implemented to ensure ANO is made aware of this, if and when it happens.*

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Plan International Australia considers child abuse unacceptable in all circumstances and is committed to ensuring that all possible and necessary steps are taken to acknowledge the rights of and protect the well being of all children (a person under the age of 18 years) that we work with.

**Donor Relations and corporate supporters**

Both the Donor relations and Corporate Relations teams need to consider child safeguarding issues in relation to:

- Visits to the field (both overseas and in Australia)
- Sponsoring a child from the same or nearby country of residence
- Use of children’s personal information
- Partnership agreements and contracts.

**Visits to the field (overseas and in Australia)**

As outlined in the “Guidelines for child safeguarding and facilitating visits” section:

- ALL sponsors, major donors and individuals (including those visiting as part of a school visit) visiting communities in Plan-assisted project areas must have or undergo a National Coordinated Criminal History Report (police check) facilitated by PIA.

- ALL other visitors associated with an institution/workplace, as well as support staff such as drivers and translators visiting communities in Plan-assisted project areas, must provide assurance that ALL visitors have either a valid Australian Federal Police Check or a Nationally Coordinated Criminal History Report (a check is valid if was run within the last 12 months). If they are unable to do so, PIA will request the visitor/s have a check prior to the visit.

- ALL visitors to the field must sign onto PIA’s Safeguarding Children and Young People Policy and the Plan International Australia Working with Children Code of Conduct

- ALL visitors to the field must comply with local child protection requirements when asked by overseas Plan offices and officials.

For guidelines on how to arrange a visit, other than criminal record checks, refer to the Guidelines for Child Safeguarding and Facilitating Visits.

**Use of children’s personal information**

Direct approach fundraising

Direct approach fundraising is an effective recruitment tool, however, it has a number of potential child protection risks. The following processes and guidelines have been developed to mitigate these risks:

- Child safeguarding must be included in all contracts with direct approach companies
- Child safeguarding must be included in the PIA training/refresher package for direct approach company employees and advocates
- Advocates joining a PIA account, who are not Australian residents, must sign a Plan International Australia Self Declaration Form, sign onto the Plan International Australia Safeguarding Children and Young People Policy and the Plan International Australia Working with Children Code of Conduct, and receive a child protection induction (using e-learning tool) and ongoing training (included in the PIA training package) and increased supervision
- Ongoing, full-time employees of direct approach companies must undergo a criminal records check via Victoria Police, sign onto Plan International Australia Safeguarding Children and Young People Policy and the Plan International Australia Working with Children Code of Conduct, and receive a child safeguarding induction and ongoing training (included in the PIA training package)
- Spot check audits must be undertaken by PIA staff every six months to ensure the above procedures are being implemented
- Measures must be undertaken to ensure the security of Sponsor Child Information Sheets (SCIs). SCIs are to be returned to team leaders, be stored in a lockable location and undergo reconciliations that are undertaken by PIA. Financial penalties apply for the loss of any SCIs.
Information safeguarding and Information, Communications and Technology (ICT) – child safeguarding procedures

PIA is committed to protecting the security, privacy and dignity of all children with whom we work. Children and their families must be assured that PIA is protecting the integrity of publicly available information that we share about them, including photographs. PIA takes potential abuse of child photographs on the web very seriously. Privacy also demands that children, their families and communities be shielded from any potentially inappropriate contact from sponsors or others.\(^{41}\)

PIA is increasingly using ICT for existing and new work, and children respond positively and benefit from these new initiatives. Whilst there may be a general digital divide, it is important that PIA challenges the assumption that communities where we work do not have access to technology, mobile phones and image messaging as there is the potential for unmonitored communication between sponsors and children. It is essential that protocols and portals are closely monitored to keep up with technological developments\(^{42}\) and that information relating to children is safeguarded and used in a way that respects their privacy and rights, and minimises the risks of intentional and unintentional harm to children.\(^{43}\)

Therefore, the following measures will be put in place and monitored by Plan in Australia’s Information Systems and Technology Department, the Fundraising Department (including the Donor Services Team where relevant [eg use of child sponsorship information and child data]) and the ACEDepartment where relevant (research, project reporting, case studies, youth participation and global learning projects etc):

- Ensure that downloading, copying, or other replication of photos/information on PIA’s website is restricted
- Ensure My Plan pages are right-click disabled to prevent separate components of that page being downloaded
- Any content displayed on PIA’s website that relates to individual children must be protected by secure processes and systems designed to prevent unauthorised access to the source database
- Development and activation of child safeguarding anomaly, and offender wash list reports on CRM
- Limit and mitigate child safeguarding risks in regard to social media sites
- Data relating to children is collected for a specific authorised use and only used as intended. All collected information is protected in accordance with local Privacy Acts and Data Protection Laws. Information that identifies families or children is not disclosed or accessed by an unauthorised person without the informed consent of the family and, when appropriate, the child.

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\(^{41}\) Edited from World Vision’s Child Protection website.

\(^{42}\) Setting the Standards.

\(^{43}\) Plan’s Child Protection Policy – Implementation Standards.
Policies and procedures are in place to govern the safe storage, handling (including transmission) and disposal of child sensitive data/information (including all sponsorship communications and images), ensuring that:

- Information is held securely. Electronic information is password protected and hard copies are filed in lockable storage
- Child sensitive data is not stored on public, borrowed, personal or portable equipment or any local or remote computer not owned by Plan
- Child Data information is only transferred by authorised means
- Authorised access is only given to staff that need the information to perform their duties. Access to images is continually monitored
- Clear and documented accountability includes regular reviews on who has access and explicitly include a review of their continued need for access to the data to perform their role
- There is a system in place to control and authorise the release of information on children (such as data and images) to the internet or another public domain
- Posted documents are parcelled so that information contained is kept secure
- Hard copies of confidential and child sensitive data are disposed of or destroyed in an appropriate manner, with an appropriate supplier, and in line with country legislation
- Any deviation from agreed processes is appropriately authorised in advance.
- Breaches to the security of child sensitive data are reported and acted upon immediately
- Unauthorised access to child sensitive data (electronic information, printed information or knowledge information) is immediately reported to the department manager who must follow it up appropriately (the Child Safeguarding Advisor can assist with this)
- All information loss is reported to the Help Desk, including information that may be on lost assets (laptops, thumb drives etc)
- ICT use (both in and out of the office) is appropriately monitored. Inappropriate sites are banned. Local policies (based on the global policy) exist and clearly state what disciplinary action will be taken for breaches.

In addition, PIA's Information Security Policy [http://plan.intranet/Staff/Policies/Documents/Electronic%20Communication%20Network.docx](http://plan.intranet/Staff/Policies/Documents/Electronic%20Communication%20Network.docx) outlines conditions and rules including prohibiting "the viewing and/or downloading of pornography or other offensive material". This clause includes sites whereby children have been exploited in what is more commonly known as "child pornography".

44 VPN, SSL etc.
Child Safeguarding and the Programs and ACE Departments

Addressing the rights of children, including their right to protection, is a strategic focus of the work undertaken by the Programs and ACE Departments at PIA.

Partnerships

Child safeguarding should be a part of all partner agreements and recruitment (with specific guidelines for those working directly with children or having access to children’s data). For specific guidelines see the Guidelines for Child Safeguarding in Partnership Agreements and Contracts section and the Recruitment and Screening Procedures Section.

Programs

- The Programs Department must consider and address (as relevant) child safeguarding throughout the project cycle of projects and programs. See the Programs Department Manual of Procedures for specific guidelines on mainstreaming and risk assessment for child protection.

- The Programs Department will utilise the information collected in the annual Plan International child safeguarding self assessment tool and other global monitoring mechanisms such as global assurance audits to monitor the implementation of child safeguarding across Plan International programs globally, particularly those directly funded by Plan International Australia.

Working in emergency situations

Children are particularly vulnerable to abuse in emergency situations. Recent investigations have revealed that adults who are part of the humanitarian relief effort have abused children. PIA has a duty to ensure our work is implemented with additional vigilance and that children are not harmed as a result of direct or indirect contact with Plan participants (including media) during times of emergency.

- Recruitment of new staff and consultants should be undertaken according to the Plan International Australia Emergency Standard Operating Procedures

- Deployment of Plan staff should be undertaken according to the Plan International Australia Emergency Standard Operating Procedures

- New partner organisations should receive an explanation of the SCYP and Plan Australia Working with Children Code of Conduct and relevant procedures at an early stage, and practical protection steps should be identified, subject to the activity and context. Training needs and other protection measures should be identified and implemented as a priority

- Media and marketing teams are subject to the usual protection checks before departure. They must be fully briefed by PIA’s Child Safeguarding Advisor on the SCYP and Plan
Australia Working with Children Code of Conduct as well as related procedures and practice.\(^{45}\)

**Advocacy and Community Engagement**

- ACE Department must ensure child safeguarding measures are undertaken in all of their youth participation, advocacy and development education initiatives and will work with other departments to ensure these measures are undertaken for similar activities.\(^{46}\)
- ACE Department will include child protection in advocacy work.

**Informed consent**

There are guidelines for informed consent outlined in the Marketing and Media Guidelines section under Informed Consent as well as Privacy and Security Issues. Please refer to this section for guidance on obtaining informed consent.

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\(^{45}\) Also see Plan’s Global Brand Guidelines and Media Visit Guidelines.

\(^{46}\) For relevant guidelines regarding working with children see the “Projects, events and communication involving children and young people” section.
Activities, projects, events and communication involving children and young people

This section applies to all departments.

PIA must ensure we are keeping children safe when developing, implementing and inviting children to participate in projects, events, activities, research and online social networking, as well as visiting Plan offices.

Through PIA facilitated/organised youth participation, global learning, program and media activities, children and young people are engaged in direct and active ways that sometimes even requiring them to leave the safety and familiarity of their local communities. Plan Participants are also starting to engage more in activities that involve children. Unless PIA has adequate child protection measures in place, such activities leave them open to child abuse and breaches of their rights.

The types of activities mentioned above include:

- Overseas projects involving children in Plan-assisted communities
- Youth participation and global learning projects facilitated by Plan International Australia
- Children and young people visiting National Offices from overseas Program Units and communities
- Local media and other public relations events
- Conferences
- Working groups
- School presentations in Australia
- Children’s Boards at National Offices
- Large scale media events
- Web linkups and social networking.

Refer to the PI toolkit: Making Events for Children and Young People Safe on Planet 2.0 for further guidance

Please also see the risk assessment guidelines for activities and events involving children:

http://plan.intranet/development/Childprotection/Documents/Children%20events%20risk%20assessment%20form.docx

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