

## HFHA CHILD PROTECTION POLICY AND PROCEDURES

<b>Policy Title</b>	Child Protection Policy and Procedures		
<b>Unit</b>	CEO, Habitat for Humanity Australia		
<b>Version</b>	Version 8.0		
<b>Authorised by</b>	Board of Directors		
<b>Date first ratified</b>	27 June 2008	<b>Re-ratified</b>	July 2011
<b>Reviewed</b>	September 2013	<b>Re-ratified</b>	18 November 2013
<b>Reviewed</b>	November 2016	<b>Re-ratified</b>	December 19 2016
<b>Reviewed</b>	March 2018	<b>Re-ratified</b>	7 May 2018
<b>Reviewed</b>	October 2019	<b>Re-ratified</b>	18 November 2019
<b>Reviewed</b>	July 2021	<b>Re-ratified</b>	16 August 2021

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## 1. Introduction

HFHA recognises and is committed to the principles enshrined in Article 19 of the *UN Convention on the Rights of the Child* that all children, wherever they may live and whatever their circumstances, have the right to be protected, nurtured and free from all forms of violence, abuse, neglect, maltreatment and exploitation.

HFHA's Child Protection Policy and Procedures is guided by the principles enshrined in the United Nations Convention on the Rights of the Child and Department of Foreign Affairs and Trade's (DFAT) Child Protection Policy (2018).

HFHA's Child Protection Policy and Procedures are reviewed every two years and re-ratified by HFHA's Board of Directors. HFHA's Child Protection Policy and Procedures is reviewed more regularly if required to comply with any changes to the DFAT Child Protection Policy, the Australian Council for International Development (ACFID) Code, or child protection legislation or other applicable legislation.

This policy should be read in conjunction with HFHA's Child Labour Policy which outlines our commitment to supporting programs which protect the health and safety of children, HFHA's Prevention of Sexual Exploitation, Abuse and Harassment Policy, HFHA's Use of Photos and Stories Policy and HFHI's Safeguarding Policy which outlines specific provisions for managing child protection risks in humanitarian response contexts.

## 2. Definition of Terms

**Child:** In keeping with the UN Convention on the Rights of the Child, HFHA defines a child as a person under the age of 18 years.

**Abuse:** There are several forms of child abuse, all of which have the potential to have a significant impact on a child's development and well-being. They include:

- **Physical Abuse**

Physical abuse occurs when a person purposefully injures or threatens to injure a child or young person. This abuse may include slapping, punching, shaking, kicking, burning, shoving, grabbing, forced labour or making available alcohol or drugs to a child. Physical injury may take the form of bruises, cuts, burns or fractures. It is not always the case that physical injuries will be visible.

- **Emotional Abuse**

Emotional abuse occurs when persistent ill treatment of a child affects their self-esteem. This may include name calling, rejection, threatening, intimidating, cyberbullying or any other act which can affect the child's physical and emotional growth, and self-esteem.

- **Neglect**

Neglect occurs when a child's basic needs have consistently not been met to the extent that this has a detrimental effect on the child's health and personal development. These basic needs include food, clothing, shelter and supervision.

- **Sexual Abuse**

Sexual abuse occurs when there has been any (or likely) sexual exploitation of a child by an adult. Sexual abuse includes any actual, attempted or threatened sexual activity involving children, including intercourse, fondling, oral sex, exhibitionism and exposing the child to pornography.

- **Commercial Sexual Exploitation of Children (CSEC)**

CSEC occurs when a child is sexually abused or exploited in return for cash or any other goods or services. Examples of CSEC include children in prostitution, children involved as subjects in child pornography and child sex tourism.

**Volunteer:** Includes National Office volunteers, interns, National Board Directors, Committee members and Global Village, Local Village and Community volunteers (HFHA's international volunteering program). All Volunteers including those under the age of 18, must adhere to this Policy and the Code of Conduct.

- **Global Village (GV) Volunteer**

A Global Village volunteer is a registered volunteer who pays to partake in a week-long overseas volunteering program. GV Volunteers will depart their home country and fly to the Hosting Country (HC) where they will spend roughly a week in local accommodation, while partaking in various volunteer activities.

- **Local Village (LV) Volunteer**

A Local Village volunteer is a registered volunteer who pays to partake in a multiple day domestic volunteering program within Australia. LV Volunteers may travel interstate where they will spend multiple days in local accommodation, while partaking in various volunteer activities.

- **Community Volunteer (CV)**

A Community volunteer is a registered volunteer who volunteers free of charge on a single day volunteering program within Australia.

**Stakeholder:** Includes National Board Directors, Committee Members, Staff (full-time, part-time, casual), consultants, contractors, interns, volunteers, agents and partners including Habitat for Humanity National Offices (NOs), Habitat for Humanity International Branches and State based Affiliates

**Report or Complaint:** Includes any expression or communication that suggests that there may have been a breach of this Policy, including a breach of HFHA's Child Protection Code of Conduct.

### 3. Policy Statement

HFHA has zero tolerance for any form of child exploitation or child abuse and will take all necessary measures to minimise the risk of child abuse. HFHA strives to be a child safe organisation and to remove the risk of child abuse in all aspects of HFHA's operations. While it is not possible to entirely eliminate risks of child exploitation and abuse, careful management can identify, mitigate, manage and reduce the risks to children associated with HFHA operations.

HFHA will encourage, respond to and support initiatives that:

- Affirm that all children in all circumstances have the right to feel and be safe and to live free from harm, exploitation and abuse.
- Keep the health and safety of children paramount at all times.
- Ensure that personal dignity and respect for children and young people is maintained through all projects, programs, activities and departments.
- Work both directly and indirectly to reduce the risks children face, both from outside and within the family.

### 4. Policy in Practice

HFHA requires all HFHA Stakeholders, including its directors, staff, volunteers, partners and agents to understand and act in accordance with the Child Protection Policy and Procedures at all times.

HFHA has zero tolerance for any form of child exploitation or child abuse and will take all necessary measures to minimise the risk of child abuse. This risk will be minimised by employing a number of safeguards, including:

- Defining child abuse in its various forms in its policies and procedures
- Upholding and enforcing HFHA's Child Protection Code of Conduct
- Ensuring appropriate safeguards in recruitment, selection and screening of all HFHA Stakeholders
- Promoting awareness of child protection issues amongst HFHA Stakeholders, including overseas partners
- Assigning an HFHA staff member as the Child Protection Officer (CPO)

- Specifying child protection risk management obligations of Partners in Partnership and Activity Agreements with HFHA
- Undertaking annual assessments of Partner organisational compliance with HFHA Child Protection Policy
- Undertaking risk assessments for every project that may contact children
- Establishing clear procedures for dealing with child abuse allegations and breaches of this Policy
- Reviewing child protection policy standards on a regular basis and at least every two years
- Undertaking child protection risk assessments for all projects which include working with children
- Ensuring this Policy and associated reporting mechanisms are publicly available.

These activities will be assessed throughout the monitoring and evaluation of projects.

HFHA has a zero tolerance to child exploitation and abuse and will ensure the rights of the child are held paramount at all times. If an allegation of child abuse or breach of HFHA's Child Protection Policy has been made, HFHA will take steps to fully investigate the matter. Further information on this process is outlined later in this document.

#### **4.1 Confidentiality**

HFHA recognises the importance of confidentiality with regards to reporting and investigating child protection allegations, and that a breach in confidentiality can have negative effects on the child, their family, the complainant and the alleged offender. In order to protect the interests of the child, their confidentiality will be respected at all times. HFHA will not reveal the name or personal details of those alleged to anyone in or outside the organisation other than to those who need to know as part of the investigation.

#### **4.2 Code of Conduct**

HFHA's Child Protection Code of Conduct is designed to minimise the risk of child abuse allegations, policy breaches and serves as a guide for all HFHA Stakeholders to conduct themselves in a manner which in turn reduces their own risk of any allegations made against them. On commencement of their association with HFHA, all Stakeholders are required to read and commit to HFHA's Child Protection Policy and Procedures and to sign HFHA's Child Protection Code of Conduct (Appendix 1). All HFHA Stakeholders are expected to adhere to the Child Protection Code of Conduct at all times during their involvement with HFHA.

#### **4.3 Recruitment**

To uphold the principles of Child Protection, the following steps are taken during HFHA's recruitment processes:

- ***Interview and Selection Process***

The requirement to provide a National Criminal History Check is flagged during selection processes. For positions that involve direct contact with children or child-related projects; specific questions about child safety or situations working directly with children, may be asked as part of the interview process.

- ***Reference checks***

All potential employees undergo at least two comprehensive reference and character checks prior to being offered any position. Reference checks are to be documented and filed accordingly. For positions that involve direct contact with children or child-related projects, specific questions regarding the applicant's suitability to work directly with children may be asked as part of verbal reference checks.

- ***Criminal Background Checks***

National Criminal History Record Checks (NCHRC) or equivalent, are undertaken for all staff and other HFHA Stakeholders on commencement. For those staff who are in direct contact with children as part of their role, a Working with Children Check will also be required. HFHA reserves

the right to not hire staff or engage with Stakeholders with a prior conviction directly or indirectly related to child abuse.

**All Court Disclosures are required to be assessed, irrespective of the offence and their potential Child Protection risk. See Appendix II for more information.**

**a) HFHA Staff and National Office Volunteers:** HFHA staff (including full-time, part-time, casual employees, contractors, consultants and interns) will undertake a NCHRC as part of the recruitment process. HFHA National Office volunteers will require a NCHRC check only if dealing with children or if they have access to sensitive information such as details of financial accounts. Employment with HFHA is subject to the result of the NCHRC. Any staff member who will have direct access to children, as well as all senior management staff, including the Chief Executive Officer (CEO), Heads of Programs, Board Members, employees with access to sensitive information, such as details of financial accounts will need to have their NCHRCs *re-submitted every two years*. Any HFHA staff member who has direct access to children under an on-site supervisor role will be required to submit a Working with Children Check (WWCC) (or Australian State or Territory Government equivalent) in addition to their NCHRC. The check is valid for 5 years and applicants are continuously monitored on the site should HFHA need to review eligibility at any time.

**Global Village (GV) and Local Village (LV) Volunteers:** GV and LV Volunteers over the age of 18 will be required to undertake a NCHRC as part of volunteer preparation process. These checks are conducted at the volunteers' expense and processed before the volunteer's trip. A NCHRC needs to be completed before every GV or LV Build (if volunteer completes two builds within 12 months of their NCHRC check, a new NCHRC does not need to be completed). If the volunteer provides an Australian Working with Children Check, it needs to be validated with the relevant State or Territory authority by HFHA before every volunteer build. HFHA will keep the NCHRC on file for three years.

GV or LV Volunteers aged less than 18 years at the time of their build are not required to complete a NCHRC. However, GV or LV volunteers under 18 years are required to adhere to the Child Protection Code of Conduct and Child Protection Policy. HFHA also provides a Child Protection Briefing for Children and Young People (under 18 years). The briefing reiterates that the volunteer must uphold the Child Protection Policy, and that as children/young people themselves they too should feel safe at all times whilst participating in the program and know how to report incidents.

#### **4.4 Child Protection Awareness and Training**

HFHA recognises the importance of ensuring all Stakeholders are aware of child protection issues and their responsibility to uphold the rights of the child at all times.

As part of the induction process for all new HFHA staff members, they receive a copy of HFHA's Child Protection Policy and are expected to complete the online training on HFHA's Child Protection Policy and Procedures within the first month of their employment

Annual staff training (or more frequently to introduce any policy changes) is provided by the Child Protection Officer to ensure that:

- a) Staff understand what Child Protection is, understand the HFHA Child Protection Policy and Code of Conduct, why they are both important and how it impacts their work.
- b) Staff understand the reporting procedure and consequences if there is an issue where the Child Protection Policy or Code of Conduct is breached.
- c) Staff have an opportunity to raise any questions, challenges and apprehensions they may have in implementing the Child Protection Policy and Procedures.
- d) Staff are aware of any changes to the HFHA Child Protection Policy or Code of Conduct.

HFHA National Board Directors and sub-Committee members are briefed on HFHA's Child Protection Policy and Procedures on commencement and are required to familiarise themselves with the Policy and Procedures and to sign the Child Protection Code of Conduct.

#### **4.5 Australian Child Protection Laws & Regulations**

Each State or Territory in Australia follows certain processes when investigating or responding to allegations or suspicions of child abuse. Any allegations or suspicions resulting from HFHA activities in Australia will be referred to the relevant State or Territory authority by the CEO and CPO.

#### **4.6 International and Local (in field country) Child Protection Laws**

All HFHA Stakeholders have a legal obligation to adhere to International and Local (in field country) Child Protection Laws whilst representing HFHA. This obligation is part of the Child Protection Code of Conduct.

#### **4.7 Child Protection Officer**

The CEO appoints a Child Protection Officer (CPO) (and an acting CPO in their absence) who is responsible for:

- Ensuring Child Protection Policy and Procedures are up to date and relevant.
- Monitoring organisation-wide compliance with the Child Protection Policy and Procedures.
- Coordinating staff induction and trainings/briefings on HFHA Child Protection Policy and Procedures.
- Together with the CEO, jointly responding to any allegations of child abuse, neglect or any other action which directly contravenes HFHA's Child Protection Policy and Procedures.

#### **4.8 Risk Mitigation**

To ensure that HFHA upholds the the Child Protection Policy and Procedures to the highest standard possible, risk management strategies are applied across the organisation. These include:

- Planned activities and programs consider the rights of children and their safety, and every project's risk management plan includes analysis of child protection risks and measures required for their mitigation. Management of these risks is monitored through regular project reporting.
- Wherever children are involved in an activity, at least two adult staff members are present at all times, and where possible, open plan spaces are used for activities involving children.
- All HFHA Stakeholders are informed about HFHA's Child Protection Policy and Procedures and any revisions to the policy or procedures
- The Child Protection Policy and Code of Conduct are enforced at all times.
- Child Protection risks are included as a standing item in HFHA's Organisational Risk Register and the International Programs Risk Register.

#### **4.9 Child Protection and our Overseas Partners**

HFHA works with partners to address child protection in our international development programs and projects. HFHA supports its Partners to understand and comply with the Child Protection Policy and Procedures through:

- Providing guidance on risk identification and minimum requirements for Child Protection (refer to Appendix VII)
- Assistance with developing their own Child Protection or Safeguarding Policy
- Annual monitoring of Policy compliance by HFHA's International Program Team during monitoring trips (travel restrictions permitting) to ensure partners and secondary partners meet minimum requirements for Child Protection (refer to Appendix V and VI for monitoring checklist and tools)
- Capacity building support for policy implementation as needed.
- Including Child Protection as a cross-cutting theme in overseas project design.

As part of our Partner's Child Protection Policy, HFHA encourages each Partner to put in place a Local Reporting Procedure to include local contacts and referral list of networks.

HFHA has an obligation to report to HFHI and to DFAT immediately any suspected or alleged case of child exploitation, abuse or policy non-compliance or Code of Conduct breaches in DFAT funded activities or projects. This includes any incidents from downstream partners. As outlined in our Partnership Agreements, HFHA requires Partner Organisations to alert HFHA of any such incidents or reports immediately, so that these reports can be referred to DFAT and HFHI.

#### **4.10 Marketing and Communications**

HFHA takes steps to ensure the appropriate use of children's images (including photographs, videos, DVDs etc.) in all its marketing activities and communications. All HFHA staff are briefed and receive consent forms to use when collecting media content on Global Village builds, Local Village builds or project visits. Further information on the appropriate use of stories and photos is in HFHA's Use of Stories and Photos Policy. Steps we have taken to ensure the appropriate use of children's images include the following:

- a) Any image of a child shall not be printed, scanned or distributed without consent from the child's parents/guardians.
- b) All children must be appropriately dressed in images and concern for their dignity and respect will remain paramount at all times.
- c) An image must not be taken which depicts children in a submissive or sexually suggestive manner.
- d) An image must not disclose details which could enable the child to be identified.
- e) An image of a child must portray a truthful account of their situation.
- f) No information will be published which will identify the exact location of a child e.g. surname, first name and village name may be changed to protect children's identity; and geo-tagging of photos must be turned off.

#### **4.11 Child Protection and our Global Village and Local Village Programs**

Global Village (GV) is HFHA's international volunteering program and involves members of the public visiting, building with and interacting with people in our project communities. Various procedures are in place to mitigate any risks to children as part of a Global Village build.

Local Village (LV) is HFHA's domestic volunteering program and involves members of the public visiting, building with and interacting with people in our project communities for multiple days. Various procedures are in place to mitigate any risks to children as part of a Local Village build.

##### **a) Pre-departure Screening and Awareness Raising**

- All volunteers (18 years and older) complete a registration form and are interviewed to gauge if the volunteer is a good fit for the program.
- All volunteers (18 years and older) complete a NCHRC or provide an Australian Working with Children Check. Registrations are not official until adequate evidence is provided.
- All volunteers must read and commit to HFHA's Child Protection Policy and Procedures, which includes signing HFHA's Code of Conduct, the behavioral guidelines for all HFHA representatives, as well as HFHA's Use of Stories and Photos Policy.
- All volunteers are provided with a range of pre-departure trainings and briefings which outline their obligations around child protection including; the Team Member Manual (provided to volunteers up to six months before build departure) and pre-departure briefings (between 1-2 months before build departure).

##### **b) During the Build Trip**

- GV and LV Team Leaders (voluntary leader of the other volunteers) are required to ensure their team is compliant with HFHA Policies at all times. If at any time a team member does not comply with HFHA policies, Team Leaders are required to inform both the local host coordinator and the HFHA Global Village staff immediately.
- All GV and LV volunteers are only allowed in project communities with HFH staff at designated times. They are not left alone with children or families and volunteer activities are not undertaken directly with children. The nature of the program mitigates the risk of participants interacting with a child and their family. GV and LV volunteers work on our build sites with local construction staff and alongside the beneficiary family.
- Advice on collection of media content (including stories and photos) is outlined in the Use of Stories and Photos Policy. Where possible, HFHA staff monitor what photos volunteers are sharing through social media platforms. HFHA staff also encourage volunteers to use specific hashtags and tagging on social media whilst on their build, which assists with this monitoring.

##### **c) Post-Build**

- A debrief call with Team Leaders and post-build surveys to Team Members capture any concerns or issues, such as Child Protection Policy or Code of Conduct breaches that have

not been escalated during the build week.

#### **4.12 Child Protection Policy and Code of Conduct Breaches**

A breach occurs when a Stakeholder's behaviour contravenes the principles outlined in the Child Protection Policy or the Code of Conduct, but does not constitute child abuse, as described in the definitions (see definitions in Section 1). A complaint of a breach of the Child Protection Policy and the Code of Conduct by any HFHA Stakeholder, must be reported to the CPO immediately.

#### **4.13 Child Abuse Report or Complaint**

There is an ethical, moral and legal obligation that all incidents of physical, sexual or emotional abuse are reported (see definitions in Section 1 Introduction). Any complaint or report of any form of child abuse must be reported to the CPO immediately. For allegations connected with DFAT funded projects, any suspected or alleged case of child exploitation, abuse or policy non-compliance must be reported immediately to [childwelfare@dfat.gov.au](mailto:childwelfare@dfat.gov.au)

#### **4.14 Investigation of Reports or Complaints**

- 1) Any report or complaint is to be reported immediately to the CPO who will immediately inform the CEO and Chair of the Board of Directors. Wherever possible this should be done using the Reporting Form for Suspected Child Abuse or Child Protection Policy Breach (Appendix IV). For all complaints of breaches, the CPO will make an initial assessment of the severity of the breach and the urgency of action. In the event that the alleged perpetrator is the CEO, the CPO will notify the Chair of the Board directly. Any relevant donors or third parties (such as DFAT) will be informed as required, where a breach involves an activity which is supported by such a donor or third party.
- 2) The CEO will appoint a team to conduct a formal investigation into the complaint or report. The investigation team may include HFHA staff (such as Managers) or members of the Board of Directors. The investigation team will treat all complaints and reports seriously. The investigation will be handled professionally, in confidence and in a timely manner. Procedural fairness will be applied and all decisions made will be in the best interests of the child. HFHA will ensure that the person who raises the complaint or report is not required to express their suspicion to the person implicated. Individuals who report a suspected breach are not responsible for investigating their concern.
- 3) If the report or complaint is assessed as being a potential criminal offence, the CEO is required to refer the complaint or report to relevant State Territory, or Federal authorities or in the case of HFHI National Offices, in-country law enforcement authorities.
- 4) HFHA's investigation must not interfere with any steps being taken by appropriate authorities. Ordinarily this will mean that the HFHA investigation will not proceed further until the investigation by law enforcement authorities has concluded.
- 5) If the alleged perpetrator is an HFHA employee, the CEO has the authority to stand them down until an investigation has been completed. If the alleged perpetrator is associated with HFHA in a volunteer capacity, they must cease HFHA activities until the investigation has been completed. If the allegations are from previous involvement with HFHA, the alleged perpetrator is not able to re-engage with HFHA until the investigation has been completed.
- 6) If the breach concerns an HFHA Stakeholder overseas or one of our overseas partners; HFHA will work with the relevant overseas partner and local Habitat office to investigate the matter and to manage the allegation. If it involves an HFHA Stakeholder on a volunteering program team, HFHA will work with the Host Coordinator, Supervisor, Team Leader and other team members (when required) to investigate the issue.
- 7) The team that conducts the investigation will provide a written report to the CEO setting out the investigation findings and course of action to address the matters raised by the investigation.
- 8) Once an outcome has been determined by the CEO, the people involved will be informed including (where appropriate) the child, family, and alleged perpetrator. Anyone else actively involved will be informed on a need-to-know basis consistent with confidentiality requirements.
- 9) All necessary steps will be taken after the investigation has been completed to address the outcome. This may include:
  - Compensation for a child harmed
  - Reinstatement of a staff member
  - Necessary actions to address any reputational impact or concern amongst HFHA Stakeholders



- Dismissal of the perpetrator
- Disciplining of a staff member
- Steps to terminate engagement of a volunteer with HFHA
- Requiring any associated organization such as an Affiliate or Partner organization to carry out appropriate steps including those set out above.
- Liaison with law enforcement authorities.

HFHA will keep a record of all reports and complaints and the investigation and outcomes of those reports and complaints. This record must be appropriately kept so as to protect confidentiality.

Refer to Appendix III for a flowchart of the procedure for addressing reports or complaints. The HFHA Complaints Policy should also be referred to for principles and procedures adopted by HFHA.

NB: Habitat for Humanity International has also provided a mechanism for raising in good faith any suspected violations of the laws or of Habitat for Humanity's policies. Habitat Ethics and Accountability Line (HEAL) is a hotline and website provided by a third-party service. This system can be used when the reporter or complainant wishes to remain anonymous.

Reports or complaints can be made online or via telephone 24 hours a day, 7 days a week:

- Within the United States, call toll-free 1-800-461-9330
- Outside the United States, call collect 1-800-763-983
- Online at <https://app.convercent.com/en-us/LandingPage/499b0647-c9d1-e511-80cc-000d3ab1b4ff>

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2. Habitat for Humanity International. Child Labour Policy
3. Habitat for Humanity Vietnam (July 2007) Child Labour and Protection Policy.
4. United Nations (1990) Convention on the Rights of the Child (UN CRC)
5. International Labour Organisation (1973) Convention No. 138
6. International Labour Organisation (1999) Convention No. 182 (ratified 2006 Australia)
7. DFAT (2018) Child Protection Policy
8. ChildWise (2006) Child Protection Strategy outline
9. NSW Ombudsman (2004) Child Protection in the workplace: Responding to allegations against employees.
10. DFAT Child Protection – Professional Behaviours, Attachment B of DFAT Child Protection Policy 2018

## Appendix I: Habitat for Humanity Australia's Child Protection Code of Conduct

As an HFHA representative, I **WILL**:

- Treat all children and young people with respect at all times, regardless of race, religion, ethnicity, indigeneity, disability, age, displacement, caste, gender, gender identity, sexuality, sexual orientation, poverty, class or socio-economic status or any other difference.
- Ensure that I am fully aware of HFHA's Child Protection Policy, Principles and Procedures.
- Ensure that I am fully aware and abide by HFHA's Prevention of Sexual Exploitation and Abuse Policy, Principles and Procedures.
- Promote a safe environment where children (and young people, parents and families) feel safe, empowered and able to communicate openly.
- Act professionally and maintain appropriate boundaries at all times.
- Avoid circumstances where my behaviour may be misinterpreted as hostile, suggestive, inappropriate or neglectful.
- Always ensure that a minimum of two adults are present when with a child. If it is not possible to have another adult present, ensure that I am at least visible to others.
- Act swiftly and ensure that any perceived risk to a child is immediately reported via the procedures in the HFHA Child Protection Policy and Procedures.
- Immediately report concerns or allegations of Policy and Code of Conduct non-compliance, child exploitation or abuse; to HFHA senior management, Child Protection Officer or build team leader, regardless of whether this has resulted in harm to a child.
- Immediately disclose all charges, convictions and other outcomes of an offence under any legislation (not only relating to Child Protection), which occurred prior too during my association with HFHA.
- Keep all cases and allegations (proven or otherwise) reported to HFH confidential at all times.
- Adhere to international or local (in field country) child protection laws
- Comply with all relevant Australian and local legislation, including labour laws in relation to child labour.

As an HFHA representative, I **WILL NOT**:

- Engage in any behaviour (including use of language or physical) with a child which is, or could be interpreted as inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Engage in any unwarranted or inappropriate touching of a child.
- Engage in any form of sexual intercourse or sexual activity with a child or any persons under the age of 18 years, regardless of the age of consent.
- Spend time alone with a child or children in their home or community.
- Invite unaccompanied child or children to visit my home, hotel accommodation or office, or take an unaccompanied child or children in a vehicle (except in emergency situations, or if they are at immediate risk of injury or in physical danger).
- Not sleep close to unsupervised children.
- Undertake or participate in any activities with children present which are illegal.
- Give or provide children or their parents with alcohol or illegal drugs.
- Hire or use children for domestic assistance or any other form of labour.
- Engage in special treatment of a child e.g. spending inappropriate special time with a child, inappropriately giving gifts, showing special favours to them but not other children, allowing the child to overstep rules.
- Use physical punishment on children,
- Not use any electronic equipment to exploit or harass children, or access child exploitation material through any medium.
- Engage in testing of boundaries with a child e.g. undressing in front of the child,

- talking about sex, 'accidental' touching, for example, of the genitals.
- Misuse photographs for the purpose of exploiting children.
- Exchange personal contact details with children and have ongoing communication with them after my visit to the community with Habitat for Humanity.
- Visit or return to HFHA communities/families I have previously visited, without the facilitation of Habitat for Humanity.
- Give gifts or special favours to a particular child or family member. This can appear to be grooming and shifting the power dynamic between you and the child and their family.

### **Children in Stories and Photos**

I will ensure the appropriate use of children's images in my emails, donor updates and communications. As such:

- Obtain informed consent from the child AND parent or guardian of the child before photographing or filming a child. As part of this I must explain how the photograph or film will be used.
- All children must be appropriately dressed in images and concern for their dignity and respect will remain paramount at all times.
- An image must not be taken which could depict the child in a sexually suggestive manner.
- An image must not in any way include information which will identify the child.
- An image of a child should portray a truthful account of their situation.
- I will protect the identity and location of a child by not reporting their full names and exact location. HFHA requires you to not publish surnames and village names when you communicate stories or display photos of children or adults.
- Assess and endeavor to comply with local traditions or restrictions for reproducing personal images before acquiring consent to photograph or film a child or adult.
- I will have GPS tracking turned off when taking pictures/video of children, so that when they are uploaded to social media the photo will not contain data that can be used to identify the location of the child.
- I will not add location mapping to any photos shared through Instagram, Facebook, Snapchat, Twitter and any other social media platforms.
- Use any computers, mobile phones, video cameras, cameras or social media appropriately and never to exploit or harass children or access child exploitation material through any medium.
- Ensure file labels, Meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.
- I have also read the HFHA Policy on Use of Stories and Photos and agree to abide by its provisions.

*I have read and familiarised myself with the HFHA Child Protection Policy and Procedures and reviewed the HFHA Child Protection Code of Conduct and I agree to adhere to these standards throughout my association with HFHA. I understand that the onus is on me as a person associated with HFHA, to use common sense and avoid actions or behaviours that could be construed as child exploitation and abuse.*

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Name of Witness: \_\_\_\_\_

Date: \_\_\_\_\_

Signature of Witness: \_\_\_\_\_

## Appendix II: National Criminal History Record Checks

### **State, Territory and Federal Police conduct Criminal Background Checks.**

Habitat for Humanity Australia conducts and accepts police checks via appropriately accredited providers.

Appropriately accredited providers of National Criminal History Record Checking Services (NCHRC Services) work in cooperation with the Australian Police Services. By using these online services HFHA is able to:

- View results online
- Print certificates when required
- Obtain copies of any disclosable outcomes (police records) to nominated authorised officer

The majority of checks are completed within one business day unless (a) the check reveals a conviction or (b) someone with a similar name to the applicant has a conviction and the check is then manually processed **by each State or Territory police force** which can take approximately one to four weeks.

Applicants must complete a waiver, sign the CoC and provide a NCHRC to be eligible to volunteer on a program. HFHA will keep the NCHRC on file for three years.

A NCHRC needs to be completed before every Global Village or Local Village Build (if volunteer completes two builds within 12 months of their NCHRC, a new NCHRC does not need to be completed).

Australian **Working with Children Checks** can be provided in lieu of a NCHRC. A certified copy of the Australian Working with Children Check card needs to be provided and validated with the relevant State or Territory authority before every volunteer build or engagement with HFHA. Any HFHA staff member who will have direct access to children under an on-site supervisor role will be required to submit a Working with Children Check (WWCC) (or Australian State or Territory Government equivalent) in addition to their NCHRC. The check is valid for 5 years and applicants are continuously monitored on the site should HFHA need to review eligibility at any time.

If police checks are not attainable (particularly in instances where people from other countries are volunteering with HFHA and a NCHRC equivalent is not available in their country) a Statutory Declaration needs to be signed and disclose any child abuse or exploitation offences.

HFHA has a process for reviewing and assessing National Criminal History Check Court Disclosures; see below for process and related form. **All Court Disclosures are required to be assessed using this form, irrespective of the offence and their potential Child Protection risk.**

## Assessment Procedure for National Criminal History Check Disclosures

Habitat for Humanity Australia (HFHA) has a process for reviewing and assessing National Criminal History Check Court Disclosures. In the event of disclosure of criminal record, this process determines whether it is appropriate for the individual with a Disclosable Court outcome to continue their involvement with HFHA (for example participate in a volunteering Program, HFHA Board directorship, office volunteering, employment, etc.). HFHA will assess the relevance of a person's criminal history to the inherent requirements of the position based on the condition outlined below. Having a criminal record does not automatically preclude an individual from participating in activities with HFHA. HFHA recognises that National Criminal History Checks alone are not a rigorous or full assessment of suitability for a role and HFHA will undertake a comprehensive assessment on a case-by-case basis of an individuals' involvement in the event of a National Criminal History Check Court Disclosure.

<b>Name:</b>
<b>Position Applied for:</b> <i>(e.g. Global Village Volunteer, Committee Member)</i>
<b>Details of Criminal History:</b>
<b>Date of Offence:</b>
<b>Seriousness of the conviction/s or offence/s and its relevance to the job in question:</b> -
<b>Whether in relation to the offence there was a finding of guilt but without conviction, which indicates a less serious view of the offence by the courts:</b>
<b>The age of the applicant when the offences occurred:</b> -
<b>Length of time since the offence occurred:</b> -
<b>Whether the applicant has a pattern of offences:</b> -
<b>The circumstances in which the offence took place, for example if it was an offence that took place in a work, domestic or personal context:</b> -
<b>Whether the applicant's circumstances have changed since the offence was committed (for example, past drug use):</b> -

<b>The attitude of the job applicant to their previous offending behaviour:</b> -
<b>Character, work and professional references:</b> -
<b>Other relevant mitigating circumstances:</b> -

Action Taken: **Approved or not approved** application for position of **(insert position)**

HFHA has determined that the inherent requirements of the activity (**list requirements of activities or association with HFHA**), i.e. *participating in a Global Village Build* include:

- *Travel overseas to a developing country*
- *Fundraise a donation to the Global Village or Local Village Programme*
- *Be part of a team*
- *Build in a community*

We decided that the nature of the offence **does or does not** impact the inherent requirements of the activity.

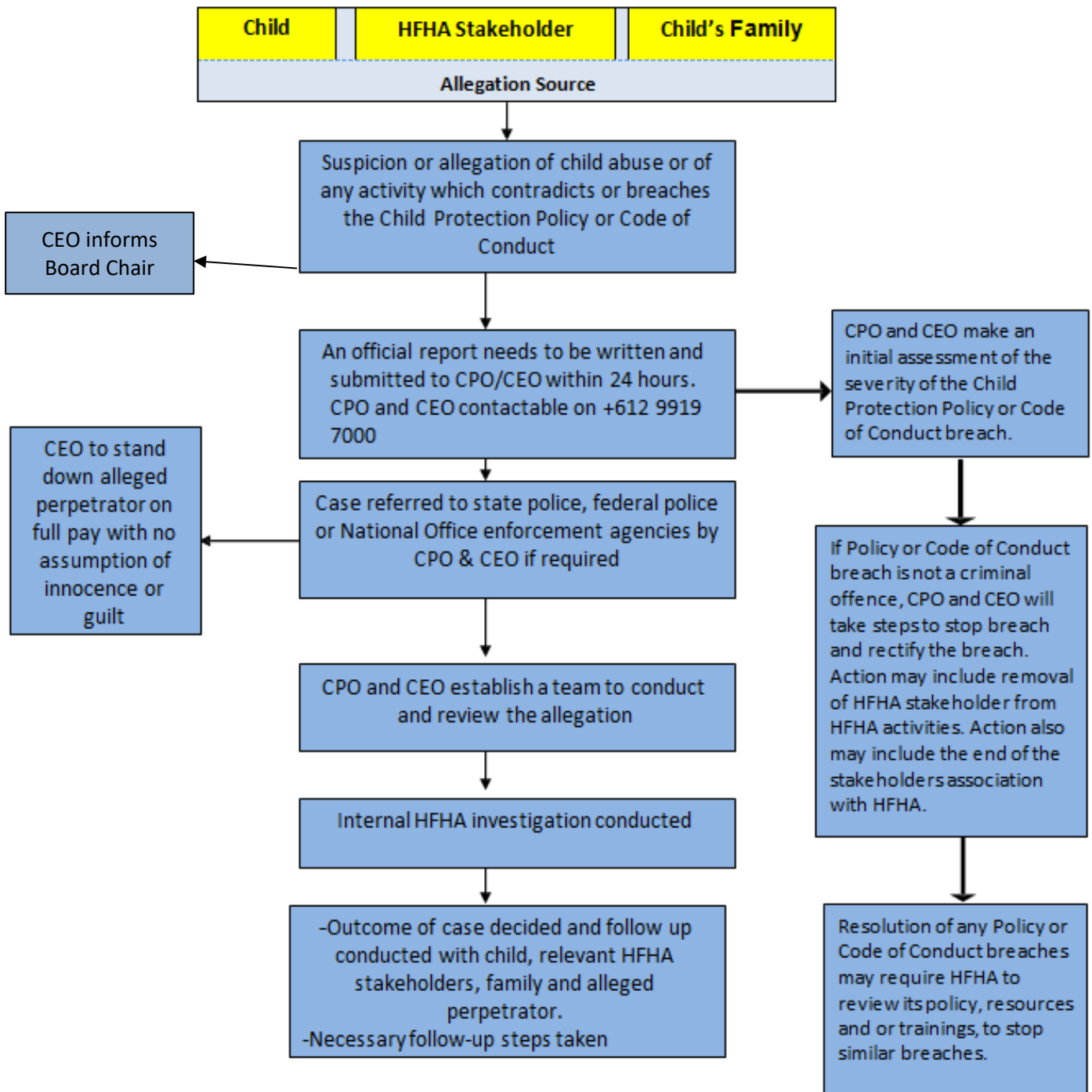
We would therefore like to **accept or deny** (full name of person) position on the (name of build/committee or activity).

Signature of CEO or their representative:

Signature of Child Protection Officer:

Signature of Relevant Functional Manager:

Appendix III: Process of Handling & Responding to Accusations of Child Abuse





## Appendix IV: Reporting Form for Suspected Child Abuse or Policy Breaches

HFHA REPORTING FORM FOR SUSPECTED CHILD ABUSE OR A CHILD PROTECTION POLICY BREACH
<ul style="list-style-type: none"> <li>This form is to be completed <b>immediately</b> after becoming aware of a potential breach of the Child Protection Policy.</li> <li>Once completed to the extent possible, send this report to the Habitat for Humanity Australia CPO and CEO. Phone +61 2 9919 7000 and email <a href="mailto:complaints@habitat.org.au">complaints@habitat.org.au</a></li> <li>Until further directions have been passed on by the CPO &amp; CEO, ensure that all the information listed below remains <b>CONFIDENTIAL</b>. It is important that confidentiality is maintained when making a report (by reporting only to the designated person). Any breach in confidentiality can have negative effects on the child, their family, the complainant and the alleged offender.</li> <li>It is important to note that those who report suspected Child Abuse or Child Protection Policy or Code of Conduct breaches are not required to investigate their concern.</li> <li>If you do not have all the information necessary to complete this form, please only complete the relevant sections based on the knowledge you have.</li> <li>All reports and complaints will be treated seriously, handled professionally, in confidence and in a timely manner. Procedural fairness will be applied and all decisions made will be in the best interests of the child.</li> <li>An alternate reporting mechanism is also available called Habitat Ethics and Accountability Line (HEAL). HEAL is a hotline and website provided by a third-party service. This system can be used when the reporter or complainant wishes to remain anonymous. Reports can be made online or via telephone 24 hours a day, 7 days a week:               <ul style="list-style-type: none"> <li>Within the United States, call toll-free 1-800-461-9330</li> <li>Outside the United States, call collect 1-800-763-983</li> <li>Online at <a href="https://app.convercent.com/en-us/LandingPage/499b0647-c9d1-e511-80cc-000d3ab1b4ff">https://app.convercent.com/en-us/LandingPage/499b0647-c9d1-e511-80cc-000d3ab1b4ff</a></li> </ul> </li> </ul>
Part One: About You
Name:
Your role or association with Habitat for Humanity Australia:
Details of any other organisation involved:
Your relationship to the child or young person concerned:
Part Two: About the Child(ren)/Young Person(s)
Name(s):

Sex:
Age:
Address:
Who does this young person(s) live with?

<b>: Your Concerns</b>
How did your concern arise? Was any form of abuse observed or suspected? Was any breach observed or suspected?
Was an allegation made by the child? Did the child or someone else disclose abuse to you? Who disclosed the policy breach? Date, time and place of any incident(s):
Describe the nature of your concern/allegation:
Observations made by you of the child's state (mental, physical, emotional) or observations made by you of the policy breach:
If you spoke with the child(ren) concerned, write down exactly what the child said, and what you said:
Any other relevant information?
Were other children either involved in the incident or aware of it?

Who else have you discussed or reported this incident to? When and where did this occur?

List any action that has been taken so far:

- *I declare that, to the best of my knowledge, the information listed above is true and accurate.*
- *I understand that it is my duty at all times to ensure that the rights of children are held paramount.*
- *I understand the serious implications in falsely accusing or reporting a HFHA stakeholder of actual or suspected Child abuse.*

Completed by: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

### Appendix V: Child Protection – Policy Implementation Checklist

– HFH Affiliates To be completed annually during a monitoring visit

Q	QUESTIONS TO ASK	YES/NO	COMMENTS/EVIDENCE
1.	Please confirm the existence of safeguarding policies that govern the organisation’s activities in relation to Child Protection (CP) and Prevention of Sexual Exploitation, Abuse & harassment (PSEAH)		
2.	Do these policies address minimum requirements of DFAT Safeguarding (CP and PSEAH) Policies (see below)?		
3.	Are these policies reviewed frequently? How often? (Please refer to most recent policy review checklist)		
4.	Are all staff familiar with the organisation’s Safeguarding (CP and PSEAH) policies?		
5.	Have all staff signed the Child Protection Code of Conduct?		
6.	Have downstream project partner organisation staff signed the Child Protection Code of Conduct? Which organisations?		
7.	Have all visitors to the project community/site as part of project activities signed the Child Protection Code of Conduct?		
8.	Is there a procedure in place for recording, investigating and acting against CP and PSEAH allegations?		
9.	Are thorough reference checks conducted for new staff? Are criminal history checks conducted?		
10.	Have there been any staff trainings on Safeguarding including Child Protection and PSEAH risks and issues? When?		
11.	Are steps taken to ensure the appropriate use of images in all marketing activities and communications? - Ensuring children are appropriately dressed - Ensuring no images are taken of children which could be viewed in a sexually suggestive manner - Ensuring that images truthfully reflect their situation - Obtaining child/guardian permission to take/use the photos		
12.	Are there reporting mechanisms in place for monitoring child rights, child protection and PSEAH issues at project level?		

13.	Is there a Safeguarding/Child Protection/PSEAH Focal Point identified in the organisation?		
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**What is the name and position of the current Safeguarding/Child Protection Officer/Focal Point at the organisation?**

<b>Name:</b>	
<b>Position:</b>	

**Actions for follow up**

Action Required	Person Responsible	Resources Needed	Completion Date

**Checklist Completed by:**

<b>Name(s):</b>	
<b>Position(s)/Organisation:</b>	
<b>Date:</b>	

### **MINIMUM STANDARDS for CP and PSEAH Policies**

As a minimum, HFH Safeguarding (CP and PSEAH) policies and practices must support the following standards:

#### **Child Protection (CP)**

1. Regularly reviewed Child Protection Policy in place
2. Commitment to Child Protection
3. Reporting Procedure
4. Risk assessment and management
5. Child Protection Training
6. Safe Recruitment and screening with employment contracts to include right to suspend or terminate

#### **Prevention of Sexual Exploitation, Abuse & Harassment (PSEAH)**

1. PSEAH Policy in place that has expectations clearly communicated
2. Reporting and investigation procedures in place
1. Risk management processes that include PSEAH risks
2. Effective and regular PSEAH training in place
3. Recruitment, screening and employment processes that manage PSEAH risk
4. Prohibit transactional sex for all personnel while engaged in delivery of DFAT business
5. Prohibit fraternisation for all non-national personnel while engaged in delivery of DFAT business.

## **Appendix VI: Child Protection Policy Checklist – HFHA & Partners**

This checklist has been developed by Habitat for Humanity Australia as a tool for partner organisations to develop their Child Protection Policy and supporting guidelines and procedures.

The purpose of a Child Protection Policy is to provide a statement of an organisation's commitment to best practice in child protection. A Child Protection Policy:

- Demonstrates commitment to keeping children safe from harm and abuse
- Educates everyone about child abuse and the rights of children
- Provides a practical guide to the protection of children from abuse within the organisation
- Supports staff and volunteers to work safely and positively with children.

The following checklist ensures that an organisation's child protection policy meets the minimum standards for ACFID and DFAT Accreditation.

### ***When to use this tool***

The following tool should be used as part of the review cycle for Habitat for Humanity Australia's Child Protection Policy, every two years.

Habitat for Humanity Australia should use this tool in assessing the quality of our partner organisation's Child Protection policies and procedures.

It must be updated to reflect changes in the ACFID or DFAT Child Protection Policies and changes in child protection legislation or other applicable legislation.

**Habitat for Humanity Australia Child Protection Policy and Procedures Checklist Tool**

Check information	
<b>Policy Title</b>	
<b>Partner Organisation</b>	
<b>Date of check</b>	
<b>Check conducted by:</b>	
Name	
Position	
Name	
Position	
<b>Due date for agreed actions</b>	

Item	Description Or Example	In Place	Partially In Place	Not In Place	Action Required To Meet Standard
<b>Content</b>	The policy and procedures must be consistent in scope and content with the Australian Council for International Development Code of Conduct and DFAT Child Protection Policy 2018 and HFHA Child Protection Policy and Procedures and HFHA Child Protection Code of Conduct.				
Title	Example: [Organisation] Child Protection Policy or Child Safe policy or Child Safe and Friendly Environment Policy				



Item	Description Or Example	In Place	Partially In Place	Not In Place	Action Required To Meet Standard
Aim/Objective/Vision	A clear statement that sets out the main objectives of the policy including information about the organisation's philosophy regarding child protection				
Scope	Example: The Policy applies to staff, volunteers, visitors etc.				
Definitions	Include a definition of a child and the organisation's understanding and definition of child abuse, child rights and child protection				
Code Of Conduct	<p>The Code must set out the appropriate boundaries and professional standards for working safely and respectfully with children and young people; This must be signed by all personnel implementing DFAT-funded activities. The DFAT Child Protection Policy provides a sample Code of Conduct called Child Protection – Professional Behaviours.</p> <p>The Code of Conduct must meet the universal child protection standards but also be culturally relevant. It can be translated.</p>				
Reporting Procedures	<p>The Policy must include reporting procedures which are known by personnel and partners and are applied in practice and cover/include:</p> <ul style="list-style-type: none"> <li>• child exploitation and abuse suspicions and/or allegations</li> <li>• non-compliance with the code of conduct or policy</li> <li>• sanctions that are/would be applied in the event of breaches</li> <li>• immediate reporting to DFAT where DFAT funds are involved</li> <li>• contact information to enable an external person to report.</li> </ul>				
Child Safe Recruitment Procedures	<p>These should include:</p> <ul style="list-style-type: none"> <li>• Pre-employment screening procedures such as criminal record and verbal reference checks,</li> </ul>				

Item	Description Or Example	In Place	Partially In Place	Not In Place	Action Required To Meet Standard
	<p>targeted interview questions for staff and volunteers who will be working with children</p> <ul style="list-style-type: none"> <li>• additional screening measures such as behavioural-based interview questions for 'working with children' positions. Checks must be conducted for each country in which the individual has lived for 12 months or longer over the last 5 years, and for the individual's countries of citizenship</li> <li>• A commitment that the organisation will not permit personnel to work with children if they pose an unacceptable risk to children's safety or wellbeing</li> <li>• A provision in all employment contracts that the organisation has the right to dismiss or transfer to other duties personnel who breach the child protection code of conduct.</li> </ul>				
Child Protection Training	Annual child protection training (which includes its reporting procedures) for personnel.				
Policy Review	Provision for policy review every two years				
DFAT Compliance	A statement must be included that says the organisation must comply with all child protection requirements stated in DFAT's funding agreements				
Child Protection/Safe Focal Point	The Policy can make an appointment for a person within the organisation who can act as a child protection contact point.				
Child Protection Risk Strategy	The Policy or accompanying Guidelines includes a Child Protection Risk matrix and steps to identifying and managing child protection risks across all activities of the organisation, which will be regularly re-assessed.				

Item	Description Or Example	In Place	Partially In Place	Not In Place	Action Required To Meet Standard
Positive Discipline	Positive discipline or safe behavioural management techniques can be included to guide staff working with children or providing support to parents.				
Safe internet, social media and email use	Safe internet and social media procedures can be included when staff or children/young people are using the organisations' computers or communicating with staff and children or young people via email, social media or SMS				
Relevant laws, child protection authorities and local reporting and referral details	Attach relevant laws such as child protection, mandatory reporting, child protection authority contact numbers and local reporting/referral contact details.				

## **Appendix VII: Child Protection Guidelines for Implementing Partners**

### **Managing Child Protection Risks on Habitat for Humanity Projects**

#### **Why Child Protection?**

Managing child protection risks effectively is critical to safeguarding the children and families who we work with, protecting our staff and volunteers, and protecting the reputation of Habitat for Humanity. Child protection risks need to be assessed as part of standard risk management processes at design, implementation, monitoring and evaluation stages – and managed throughout the lifecycle of an activity. Child Protection must be considered at the project level, as well as at the organisational level.

#### **Habitat for Humanity *is* a child-focused organisation**

Habitat for Humanity has zero tolerance for child abuse or exploitation in all its operations globally. HFH strives to be a child safe organisation at all times in all areas of operation. All organisations that work with families in communities where there are vulnerable children can be considered as working with children. HFH also engages children directly in program activities through programs such as youth build.

HFH's programs include several potential risk areas to children, including construction activities and sending volunteers into communities through various volunteering programs.

#### **Understanding risk in your context**

[DFAT's Child Protection Risk Assessment](#)<sup>1</sup> can help you to identify the overall child protection risk of your context by helping you to analyse:

1. The level of working with or contact with children in your programs.
2. Child protection controls you already have in place and the strength of these.

Through these steps, you can start to identify possible gaps in your existing child protection policies and systems and plan to address these.

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<sup>1</sup> Also available at: <http://dfat.gov.au/about-us/publications/Pages/child-protection-policy.aspx>

## Examples of common child protection risks in HFH programs

The table below includes some common potential risks from HFH programs. This list is intended as a reference to help you identify risks and possible actions to mitigate them. The list is not comprehensive, and you must consider at the start of each project or activity, what specific risks need to be considered and managed.

Project Activity	Potential Risks	Risk Mitigation
Construction activities	Children playing on construction site exposed to onsite hazards including tools or hazardous materials.	<ul style="list-style-type: none"> <li>Briefing to home partners and labourers at start of construction and monitoring by project staff.</li> <li>Fence off dangerous build sites where possible.</li> </ul>
	Children hired or used as labourers by local contractors	Brief contractors prior to signing contracts on HFH stance against child labour and monitoring by project staff.
	Children playing in area where construction materials delivered	Try to schedule deliveries during school hours and keep children away from the area where materials are being unloaded.
Training activity with child participants	Child left alone with trainer	Ensure all trainers working with children (whether they be HFH staff, local partners staff or community volunteers) have undergone internal child protection screening processes.
Staff/Volunteers have opportunity to spend time alone with children  (Children may include project beneficiaries, community members, child GV volunteers eg youth build, school builds)	Child abuse perpetrated by a volunteer or staff member	<p>Prior to employment:</p> <ul style="list-style-type: none"> <li>All staff are screened through reference checks and police checks (where possible).</li> <li>All staff are inducted on Child Protection Policy and sign Child Protection Code of Conduct.</li> </ul> <p>Prior to GV volunteers visiting site:</p> <ul style="list-style-type: none"> <li>All volunteers screened through police checks (sending country).</li> <li>Volunteers briefed on Child Protection Policy and sign Code of Conduct (sending country).</li> </ul>
Volunteers provide gifts to individual children or make available or provide alcohol and/or drugs.	Gift giving or the provision of drugs or alcohol provides opportunity for abusing children or grooming children for future abuse	<p>During GV build/volunteer visit:</p> <ul style="list-style-type: none"> <li>GV Hosting staff and Team Leader remind volunteers of expectations under Code of Conduct as part of briefing.</li> <li>GV Hosting staff and Team Leader monitor behaviour of volunteers</li> </ul>

Project Activity	Potential Risks	Risk Mitigation
Staff/Volunteers have access to personal information about children	Volunteers return to visit child/family	<p>throughout build and take action immediately to address any of code of conduct breaches that occur, including reporting to GV Managers in hosting and sending Nos.</p> <ul style="list-style-type: none"> <li>• Drugs or alcohol are not permitted under any circumstances on HFH projects or activities.</li> </ul>
Stories and photos taken by volunteers and staff of children	Inappropriately clothed children included in photos	<ul style="list-style-type: none"> <li>• All staff and volunteers are briefed on Use of Stories and Photos Policy (or similar).</li> <li>• Communications staff ensure photos/stories comply with these standards prior to publication, including ensuring appropriate consent is in place.</li> <li>• Volunteer photos are monitored by GV sending staff through social media feeds during and post build and volunteers are asked to remove any inappropriate photos.</li> <li>• Geo-tagging switched off when taking. Photos to ensure locations cannot be easily identified.</li> </ul>
	Personal information of children made publicly available	
	Children's photos/information published without parent or guardian's permission	

## Minimum Child Protection Compliance for HFHA Funded Projects

HFHA requires National Organisations (**NOs**) we work with to maintain certain minimum standards to be eligible to receive HFHA funding. HFHA also requires NOs to meet client protection standards which extend to children under SOE 6.1.6<sup>2</sup>. These should be considered as industry standard, and all NOs are encouraged to have these systems in place across their organisation, regardless of funding source.

### Child Protection Policy

1. The NO has a current Child Protection Policy and Code of Conduct (NB, NOs are encouraged to develop their own contextually relevant policies but can use HFHA's Policy while their own policy is under development).
2. The Policy includes a clear process for recording, investigating and acting against child abuse allegations. This includes that any suspected or alleged abuse in an HFHA supported project is reported to HFHA immediately (NB other institutional donors may have similar requirements).
3. The Policy includes provision for regular review (recommended every 2 years).

There are many online resources available to support organisations to develop/review Child Protection Policies. A useful starting point is [this guideline from ACFID](#) and also the DFAT Child Protection Policy 2018.

The Child Protection Policy must reflect the following actions which are required to be implemented by each NO:

### Child Protection Focal Point

4. Each NO has a staff member who is assigned the role of Child Protection Focal Point (generally an HR staff member) whose role it is to ensure implementation and review of the Child Protection Policy and to act as primary contact for any allegations made.

### Staff Training and Recruitment

5. Recruitment processes include some screening of candidates for Child Protection (depending on what is possible locally - this could include police checks, reference checks, and questions during interview). Implementation and results of these processes must be documented by HR.
6. All new staff are inducted on Child Protection Policy and sign the Child Protection Code of Conduct on starting.
7. All staff receive annual refresher training on Child Protection.

Many child-focused NGOs are able to support implementation of local training if you don't have existing staff with this capacity. HFHA has also developed training materials which are available [on sharepoint](#) and the Open Learning platform.

### Local Partners

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<sup>2</sup> The NO has established an Ethics Covenant and Code of Conduct to which each of its staff members, directors, and volunteers agrees to adhere, including conduct related to the protection of people in the communities in which we work from sexual abuse, corruption, exploitation, and other human rights violations. If working in communities through implementing partners or sub-contractors, the NO requires that those organizations similarly bind the conduct of their personnel.

8. All implementing partners are required to comply with the NO's Child Protection Policy as part of agreements signed.
9. Signed Code of Conducts are provided for all implementing partner staff working on HFH funded projects.

### **Project Implementation**

10. Each project's risk management plan includes child protection risks relevant to the project and plans to mitigate them.
11. Child protection risks are monitored by project staff as part of regular project risk monitoring and reporting.



