



Good Return

Child Protection Policy

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Document Control

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1 Introduction

At Good Return we consider the safety and well-being of children to be a priority concern. Good Return adopts a zero tolerance approach to child abuse and exploitation and child pornography, including trafficking and other forms of exploitation, wherever and however they may occur in the context of Good Return activities.

All children without exception will be treated with appropriate respect and with recognition of their fundamental right to grow up safely and to enjoy a childhood that is free from exploitation and abuse. In all of its work Good Return sustains a focus on the rights of children that is in line with the UNHCR's Convention of the Rights of the Child, which in addition to the Child Protection Policy set forth by Department of Foreign Affairs and Trade (DFAT), serves to guide Good Return policy on child protection.

With a programmatic approach of working primarily with partner agencies and adult beneficiaries, staff of Good Return are not usually directly involved in dealing with children. However many of the people Good Return partners work with are poor women with children, and occasionally Good Return supports partners on specific projects that interact directly with children. It is therefore appropriate that all Good Return staff adhere to this policy. Such adherence is monitored through the range of procedures and controls outlined in this policy, and through formal acknowledgement via signature of the Child Protection Code of Conduct, which is retained on file (see Annex A).

2 Purpose

The purpose of this policy is to **protect children from abuse and exploitation** of any kind in the delivery of Good Return programs and services.

3 Definitions

Abuse comprises:

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

Note: the above includes a child or children being present (hearing or seeing) while a parent or sibling is subjected to any of the above

Child/Children means anyone under the age of 18 years.

Guardian means any adult person who is legally responsible for the care and protection of a child

Child protection is a broad term to describe philosophies, policies, standards, guidelines and procedures to protect children from both *intentional* and *unintentional* harm

Child Abuse or "*maltreatment*" constitutes "all types of physical and/or emotional ill-treatment, sexual abuse, neglect, negligence and commercial or other exploitation, which results in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power."

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.

Emotional or psychological abuse includes humiliating and degrading treatment such as bad name calling, intimidation, constant criticism, belittling, persistent shaming, solitary confinement and isolation.

Exploitation refers to one or more of the following: committing or coercing another person to commit an act/s of abuse, grooming or online grooming against a child, possessing controlling, producing, distributing or obtaining child exploitation material, or using a child for profit, labour, gratification or some other personal or financial advantage resulting in unjust, cruel and harmful treatment of the child.

Harm is the result of the exploitation, violence, abuse and neglect of children and can take many forms, including impacts of children's physical, emotional and behavioural development, their general health, their family and social relationships, their self esteem, their educational attainment and aspirations.

Good Return staff means any paid employee, in-country personnel, volunteer, contractor, Director or ambassador.

Informed Consent ensures the child and the parent or guardian understand the implications, purpose and potential uses of photographs or videos

Neglect means deliberately, or through carelessness or negligence, failing to provide for, or secure for a child, their rights to physical safety, food, shelter and development.

Personnel are either employed by an organisation, engaged by an organisation on a subcontract basis, or engaged by an organisation on a voluntary or unpaid basis. Personnel can include paid staff, volunteers, interns, trustees, board members

Sexual abuse includes all forms of sexual violence including incest, early and forced marriage, rape, involvement in pornography, sexual slavery, indecent touching or exposure, using sexually explicit language towards a child and showing children pornographic material.

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

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 work.

4 Guiding principles

Good Return supports and is committed to abiding by the following principles:

Zero tolerance to child abuse and exploitation: Child abuse and exploitation is not tolerated by Good Return, nor is possession of or access to child pornography. Good Return will actively manage risks of child abuse and exploitation associated with delivering its activities and trains its staff on their obligations. Good Return will not knowingly engage, directly or indirectly, anyone who poses an unacceptable risk to children, nor fund any individual or organisation that does not meet the child protection standards outlined in this policy in their own operations and activities.

Recognition of children's best interests: Australia is a signatory to the United Nations Convention on the Rights of the Child. Good Return is committed to upholding the rights and obligations of this convention. Good Return recognizes that some children, such as children with disabilities and children living in areas impacted by disasters (natural or conflict based), are particularly vulnerable.

Sharing responsibility for child protection: To effectively manage risks to children, Good Return requires the active support and cooperation of contractors and partner NGOs implementing activities funded or supported by Good Return, directly and indirectly. Good Return expects contractors and partners to meet relevant terms of this child protection policy and holds them accountable for complying with it through our MoU and regular field visits.

Use of children's images: Use of photographs, videoing or other images of children will be done in a manner that is sensitive to local traditions, dignified and respectful, and that is an honest representation of the context and facts; advance permission will be obtained to use any image, and the possible use of such image explained (a Photo Release Form used whenever possible); no identifying information will be made available about any child in sending or posting images electronically. Training to the staff of partner organisations will stress that photographs should not be solely of children (unless the project works directly with children), and that any location information must only be at the regional/state level, rather than at the village level.

Risk management approach: While it is not possible to eliminate all risk of child abuse and exploitation, we will adopt a risk management approach to reduce the incidence of child abuse and exploitation associated with the delivery of our services and activities through an approach which combines an initial risk assessment (when we commence dealings with a partner) followed by subsequent field visits.

Incorporating child protection strategies into risk management procedures: Child Protection risks must be considered for all projects that 'work with' and have 'contact with' children. In projects that work directly with children, risks to children are managed for the duration of the activity.

Procedural fairness: we will use fair and proper procedures when dealing with breaches of this Policy, recognising that our decisions could affect a person's rights and interests. We will contractually require our partner organisations to adhere to this principle when dealing with concerns or allegations of child exploitation and abuse.

Labour exploitation of children- we endorse ILO Convention 182 Concerning *Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour* and expect partners to comply with labour laws

regarding child labour.

5 Compliance

STAFF

Policy: Good Return will ensure that criminal reference checks are obtained for all personnel engaging in work that is likely to involve contact with children. This will include all program staff, not only those working with children. The check would need to be conducted, where possible, before an employee starts working for Good Return.

Procedure: Checks will be conducted for each country in which the individual lived for 12 months or longer over the last five years, and for each of the individual's countries of citizenship. In cases where a police check cannot be obtained, which can be the case in developing countries, a personal character reference check is obtained from at least one person, preferably with official status (in the community, company or government), plus a statutory declaration (or the equivalent legal statement) will be required in relation to child abuse and child pornography and exploitation. See Annex E.

Two verbal referee checks are conducted for all Good Return staff and the results recorded in their file. For program staff, referees are asked whether they are aware of any child protection related issues or risks.

Control A Working With Children check for all program staff who are Australian residents & citizens. For other program staff, a police check is preferred, and where this is not possible or feasible then a statutory declaration is required. For all staff, two referee checks, with results kept on file. Compliance will be checked annually by the Compliance Adviser.

Policy: Targeted interview questioning on child protection will be carried out during the recruitment process.

Procedure: Recruitment process will include a documented request for an applicant to disclose whether they have been charged with child exploitation offences, and include a provision for their response. Template questions are provided to all interviewers.

Control Recruitment process includes file note that relevant question has been asked & answered appropriately.

Policy: All Good Return staff will understand and comply with this Child Protection Policy (CPP) , and with DFAT Child Protection policy.

Procedure: All prospective employees, volunteers, Directors, contractors and partner organisations will be informed of Good Return Child Protection Policy during the recruitment process. Employment contracts and letters of engagement contain a clause enabling Good Return to take appropriate action (up to and including dismissal) in respect of any breach of the Policy.

Control: All staff sign CPP CoC to confirm they understand and accept. Relevant clause in employment contract/ engagement letter.

Control: All partners agree to adhere to relevant parts of this CPP (or equivalent) via MOU.

Policy: Staff will not use language or behaviour towards children that is inappropriate, harassing, abusive, exploitative, sexually provocative, demeaning or culturally inappropriate nor do we engage children in any form of sexual activity or acts.

Procedure: All prospective employees, volunteers, directors, contractors and partner organisations will be informed of Good Return's Child Protection Policy during the recruitment process. Employment contracts and letters of engagement contain a clause enabling Good Return to take appropriate action (up to and including dismissal) in respect of any breach of the Policy.

Control All staff to sign CPP CoC to confirm they understand and comply

Policy: All staff working on programs (overseas or in Australia) will be required to attend a training event (generally annually) to ensure understanding of this Child Protection Policy.

Procedure: CPP training will take place at induction, with (generally) annual refreshers. Material used in training is based on DFAT guidelines. Compliance Advisor will work with the CP Officer to ensure, as far as possible, that any legislative or other changes relevant to this Policy are promptly reflected in the document, and in related training and signed undertakings.

Control Register of staff completing training

Owner Program Director / Child Protection Officer / Compliance Advisor

PARTNERS

Policy: Development partners are required to formally confirm the rejection of all forms of sexual and labour exploitation and abuse or exploitation of women and children, and to adhere to the Child Protection Code of Conduct.

Procedure: Ongoing partner awareness of this CPP will be done by reference in progress reporting and/or

through site visits at least annually.

Control Relevant clause in MoU signed by partner, with follow-up monitored & reported in the progress reports

Owner Program Director & Program Managers

VISITORS

Policy: All visitors will understand and comply with this Child Protection Policy (CPP), and with DFAT Child Protection policy.

Procedure: All visitors will be informed of Good Return Child Protection Policy during the briefing process. All visitors sign CPP CoC to confirm they understand and accept.

Control All visitors agree to adhere to relevant parts of this CPP

6 Complaints & Sanctions

STAFF

Policy: Good Return will not allow any person presenting an unacceptable risk to children's safety or well-being to work with children.

Procedure: Should any Good Return staff become aware of (or have reported to them) a situation of child abuse or exploitation, or non compliance with the Child Protection Policy or Code of Conduct, they should report the incident to Good Return's Program Director and Child Protection Officer. Partner agency staff should report any such incidents to their own organisation's senior management and to the most senior Good Return counterpart known to them. This situation must be reported as soon as possible, and may initially be reported verbally, but must be followed up by a written statement by the person making the report. If the incident involves child abuse or exploitation involving a partner organisation then the organisation's senior management must be informed and the incident reported by them to the relevant social services and police agencies. Where the affected child is not associated with a partner organisation or its staff, Good Return staff should report the incident to police and social services themselves. Parents or guardian(s) of the child affected should be informed immediately, unless they are believed to be the perpetrator.

Control All staff to sign CPP CoC (see Annex A) confirming they understand and will comply

Owner CEO

Procedure: Where there is a complaint against a member of Good Return staff involving any breach or alleged breach of this policy, there may be three types of investigation:

- a criminal investigation
- a child protection investigation
- a disciplinary or misconduct investigation.

Whichever of the above investigations are underway, Good Return CEO will make an immediate report to the Conduct and Ethics Unit at DFAT in the format required, and to the address shown in their current Child Protection Policy. Supplementary reports will be provided as the investigation proceeds, or as requested by DFAT. Senior Good Return management will make an immediate decision about whether any individual accused of exploitation or abuse should be temporarily suspended or re-assigned pending further inquiries. Irrespective of the findings of the social services or police inquiries, the Good Return Board will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be done sensitively. Every effort will be made to ensure confidentiality is maintained for all concerned and that accepted standards of procedural fairness are followed. Information will be handled and disseminated on a need-to-know basis only.

Control On a case by case basis

Owner CEO and/or Chair

Sanctions

Policy: Should any staff member of Good Return breach this or the DFAT Child Protection Policy, then that staff member may be dismissed, suspended or transferred to other duties, as appropriate.

Control On a case by case basis

Owner CEO and/or Chair

PARTNERS

Policy: Good Return will not partner with any organisation presenting unacceptable risk to children.

Procedure: Should a staff member of a partner organisation present a risk to the safety and wellbeing of children, Good Return will re-assess the agreement between Good Return and the partner

Control On a case by case basis

Owner Program Director

Policy: All development partners are required to formally confirm the rejection of all forms of sexual and labour exploitation and abuse or exploitation of women and children, and to adhere to the Good Return Child Protection Code of Conduct.

Procedure: Ongoing partner awareness of this Child Protection Policy will be done via the partnership planning process and/or monitoring activities at least annually. Where requested, Good Return will support partners to develop appropriate child protection policies and will provide training to board, staff and clients.

Control Relevant clause in MoU signed by partner, with follow-up monitored & reported in progress reports

Owner Program Director & Program Managers

7 Project Design

Policy: Project appraisal and design procedures will incorporate appropriate consideration of child protection issues and risks

Procedure: For all projects designed by Good Return, a project design appraisal (see Project Design Appraisal Tool) checklist is completed to ensure that all internal and external issues that may affect the delivery of a project are considered at the activity design stage. The Project Design Appraisal Tool is used to ensure that a risk analysis has been completed including specific risks facing children being identified where appropriate, and that a risk management strategy identifying risks, classifying any high risk activities, mitigation strategies and actions to be taken in the event of the risk occurring (including immediate reporting to DFAT). As part of its project monitoring activities Good Return will undertake to review such risks on at least an annual basis.

Control Completed and signed Project Design Appraisal Tool form for all projects

Owner Program Director & Program Managers

8 Appropriate images & materials

Policy: Any use of images or written or other materials of children will be undertaken with the informed consent of the child and parent or guardian, will respect the right to privacy, dignity and culture of partners and participants, and will not identify their location.

Procedure: Where such consent is obtained verbally, a note will be placed on file. In taking photographs and film footage of children, Good Return follows procedures to ensure that permission is requested prior to film or photos being taken by obtaining permission from the parents or guardians of all concerned children. Where such permission is obtained verbally, a file note will be made.

Control Completed release form in place for all published photographs of children (Annex B)

Owner Relationship Leads / Field Support Officers

9 Policy review

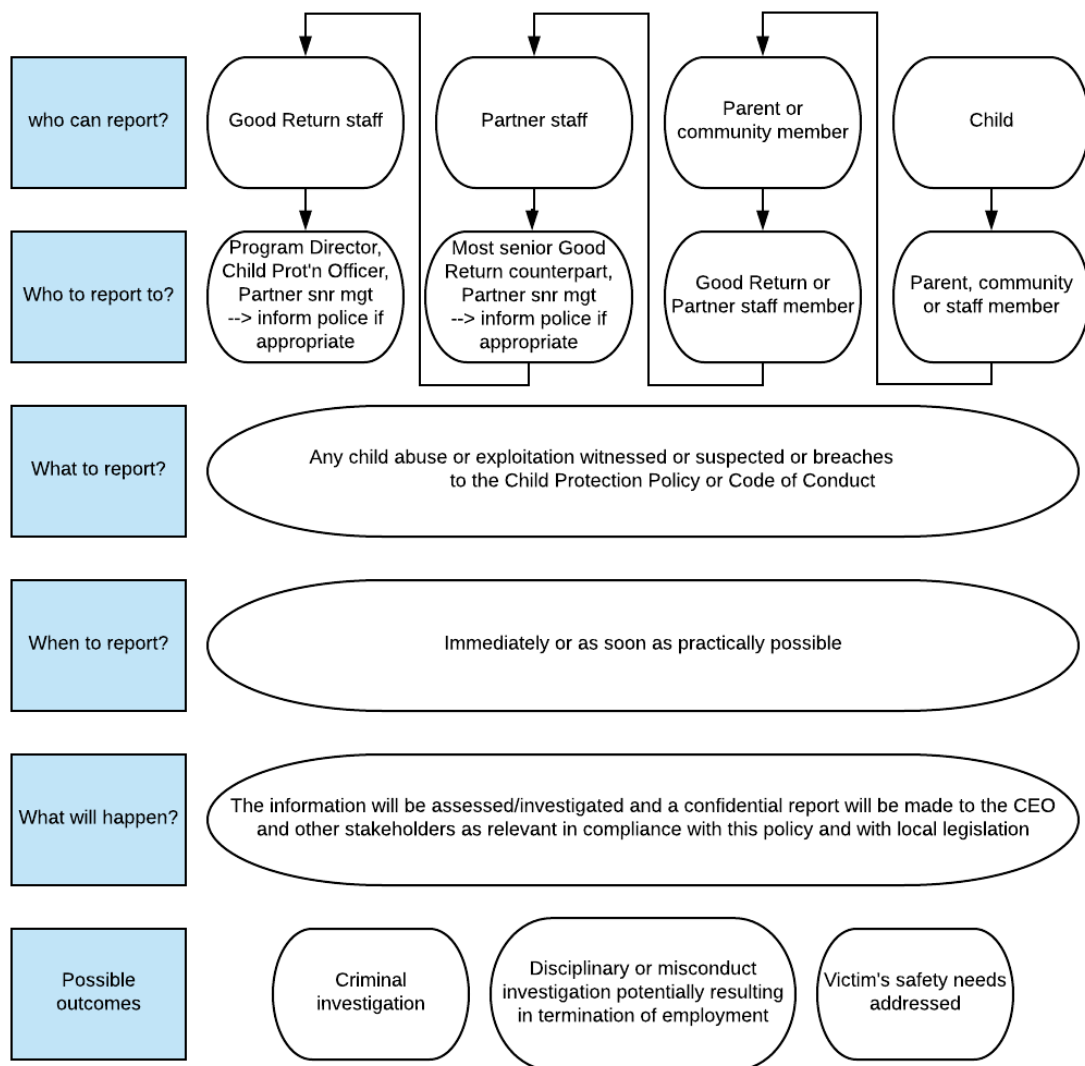
Policy: Good Return will review its child protection policy on a regular basis, in line with Australian government (DFAT) and ACFID guidelines.

Procedure: An internal review of compliance with this policy will be undertaken annually, and the policy itself will be reviewed at least once every 3 years or as required.

Control Board minute approving CPP

Owner Compliance Officer (per compliance plan & calendar)

10 Reporting Process flowchart



Procedure: The incident must immediately be reported verbally. A written report must be done in 24 hours, using the template set out in Annex D.

Control: The report is submitted to the Child Protection Officer or a senior leadership member

Annex A Undertakings: All contacts

As a staff member, volunteer, contractor or visitor engaged by Good Return, I, (*Insert your name*) acknowledge that I have read and understood Good Return's *Child Protection Policy* and agree that while implementing activities on behalf of, or in support of, Good Return, I will at all times:

- treat all children with respect, regardless of race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status
- not use language or behaviour towards children that is inappropriate, harassing, exploitative, abusive, sexually provocative, demeaning or culturally inappropriate
- not engage children under the age of 18 in any form of sexual intercourse or sexual activity, including paying for sexual services or acts
- wherever possible, ensure that another adult is present when working in the proximity of children
- not invite unaccompanied children into private residences, unless they are at immediate risk of injury or in physical danger
- not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible
- not provide children with alcohol or drugs, or gifts other than items related to program activities
- never use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material through any medium (see also 'Use of children's images for work related purposes')
- not upload photographs depicting children associated to work activities on personal or other social media channels and/or disclose their locations using GPS or identifying descriptors
- not use physical punishment on children
- not hire children for domestic or other labour which is inappropriate given their age or development stage, which interferes with their time available for educational and recreational activities, or which places them at significant risk of injury
- comply with all relevant Australian and local legislation, including laws in relation to child labour
- immediately report concerns or allegations of child exploitation or abuse or breaches of this policy to my supervisor and the CEO or Program Director
- immediately disclose all charges convictions and other outcomes of an offence that relates to child exploitation or abuse, including those under traditional law, which occurred before or occurs during association with Good Return
- Be aware of behaviour and avoid actions or behaviours that could be perceived by others as child exploitation and abuse.

These behaviours are not intended to interfere with normal family interactions.

Use of children's images for work related purposes

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

- take care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child
- before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child in conformity with Article 16 of the UNCRC – right to privacy. As part of this I must explain how the photograph or film will be used
- ensure photographs, films, videos and DVD's present a child in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive
- ensure images are honest representations of the context and the facts
- ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.

I understand that the onus is on me, as a person engaged by Good Return, to use common sense and avoid actions or behaviours that could be construed as child exploitation and abuse when implementing activities on behalf of, or in support, of Good Return.

Name (print):

Country of citizenship:

Signed: _____

Date: _____

Annex B Undertakings: Good Return partners

As a partner of Good Return, I (*Insert your name*), on behalf of (*Partner's name*), acknowledge that I have read and understood Good Return's Child Protection Policy and agree that while implementing activities in partnership with Good Return, (*Partner's name*) staff will at all times:

- treat all children with respect, regardless of race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status
- not use language or behaviour towards children that is inappropriate, harassing, exploitative, abusive, sexually provocative, demeaning or culturally inappropriate
- not engage children under the age of 18 in any form of sexual intercourse or sexual activity, including paying for sexual services or acts
- wherever possible, ensure that another adult is present when working in the proximity of children
- not invite unaccompanied children into private residences, unless they are at immediate risk of injury or in physical danger
- not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible
- never use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material through any medium (see also 'Use of children's images for work related purposes')
- not upload photographs depicting children associated to work activities on personal or other social media channels and/or disclose their locations using GPS or identifying descriptors
- not use physical punishment on children
- not hire children for domestic or other labour which is inappropriate given their age or development stage, which interferes with their time available for educational and recreational activities, or which places them at significant risk of injury
- comply with all relevant Australian and local legislation, including laws in relation to child labour
- immediately report concerns or allegations of child exploitation or abuse or breaches of this policy to my supervisor and the CEO or Program Director
- immediately disclose all charges convictions and other outcomes of an offence that relates to child exploitation or abuse, including those under traditional law, which occurred before or occurs during association with Good Return
- Be aware of behaviour and avoid actions or behaviours that could be perceived by others as child exploitation and abuse.

These behaviours are not intended to interfere with normal family interactions.

Use of children's images for work related purposes

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

- take care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child
- before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child in conformity with Article 16 of the UNCRC – right to privacy. As part of this I must explain how the photograph or film will be used
- ensure photographs, films, videos and DVD's present a child in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive
- ensure images are honest representations of the context and the facts
- ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.

I will ensure that (*Partner's name*) staff understand that the onus is on them, as staff members of (*Partner's name*), who is a partner with Good Return, to use common sense and avoid actions or behaviours that could be construed as child exploitation and abuse when implementing activities on behalf of and in partnership with Good Return.

On behalf of: (name)

Signed: _____ Date: _____

Nationality:	
Contact details:	
Age of child at time of alleged incident:	
Have any injuries been observed or reported? (If more space is needed, please utilise Section 6)	
5. Further Details	
Is the child still in danger of abuse or neglect?	
Are local police or other local authorities aware of the incident\allegation?	
What other authorities have been informed?	
6. Any other pertinent information for initial assessment	

7. Response Action Plan		
Date	Action Taken	By Whom

Report Received by:

Date: DD/MM/YYYY

Annex E Statutory Declaration Wording

Stat dec forms available at: <http://www.ag.gov.au/Publications/Pages/Statutorydeclarations.aspx>. All countries the individual has lived in for 12 months or longer over the last five years and each of the individual's countries of citizenship would need to be listed.

The following points must be included:

1. I resided in _____ from _____ during which period I was employed by _____ in the role/position of _____
2. At no time during my stay in _____ was I involved in or convicted of any criminal offence, including an offence of or relating to child exploitation or abuse or child pornography.

Signed and dated