CHILD PROTECTION POLICY
Approved by Board: 16 August 2016
Next review date: August 2017
Managed on behalf of the CEO and Board by:
Child Protection Officer

Preamble

Interplast is committed to the welfare of children and their protection from abuse and exploitation. This commitment is underpinned by Interplast’s upholding of the UN Convention of the Rights of the Child (1989). Every person who shares in the work of Interplast shares in the responsibility to take every precaution to protect the children associated with our programs.

In its work, Interplast commits to protect children from “all forms of physical and mental violence, injury or abuse, neglect, maltreatment or exploitation, including sexual abuse.”

To this end, Interplast will ensure:

- Interplast’s commitment to protecting children is embedded in the organisation’s culture and responsibility for taking action is understood and accepted at all levels of the organisation;
- Interplast will carefully recruit and manage its staff and volunteers;
- Staff, volunteers and other parties will be educated and trained about child safety and the Child Protection Policy.

The process flow chart for child protection and response can be found on page 7 of this document.

The detailed process for child protection and response can be found on page 16 of this document.

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1. **Purpose of this Policy**

The aim of this policy is for Interplast Australia & New Zealand (Interplast) to take all possible steps to ensure the protection of children against child abuse. This policy outlines Interplast's policy aims and the responsibilities that every Interplast personnel must follow, and includes a Code of Conduct for interactions with children. The attached procedure document details specific actions and guidelines for implementing this policy.

As an organisation that works in developing countries with vulnerable communities and children with disabilities, Interplast recognises the importance of a firm commitment to child protection, as part of its broader commitment to human rights and anti-discrimination. This Child Protection Policy is accompanied by appendices which provide a framework for managing and reducing the risks of child abuse by persons engaged in Interplast's programs and activities both in Australia and overseas.

2. **Scope of the Policy**

This policy applies to the following people:

- Interplast staff members, contractors and consultants;
- Interplast volunteers;\(^1\)
- Interplast Board of Directors; and
- observers/visitors accompanying an Interplast activity.

These people are collectively referred to as Interplast personnel for the purposes of this policy, the full definition of which is given in section 3 below.

3. **Definitions**

**Child (plural: children):** in line with the United Nations Convention on the Rights of the Child, Interplast considers a child to be a person under the age of 18.

**Child Abuse:** all forms of physical or mental violence, injury or abuse, maltreatment or exploitation, including sexual abuse.

**Child Protection:** an activity or initiative designed to protect children from any form of harm, particularly arising from child abuse or neglect.

**Child Pornography:** in accordance with the Optional Protocol to the Convention on the Rights of the Child, child pornography means 'any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes.' For further information regarding child pornography offences, refer to the Crimes Legislation Amendment (Sexual Offences Against Children) Act 2010 (specifically Division 272, Division 273, and Division 474, subdivision D).

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\(^1\) Volunteers include medical volunteers (surgeons, anaesthetists, nurses and allied therapists) undertaking an activity overseas or participating in professional development in their own country or overseas and non-medical volunteers, such as those in administrative, promotional or fundraising roles.
**Child-Sex Tourism**: the sexual exploitation of children by men or women who travel from one place to another, usually from a richer country to one that is less developed, and there engage in sexual acts with children. For further details, refer to the *Crimes Legislation Amendment (Sexual Offences Against Children) Act 2010*.

**Criminal Record Check**: a check of an individual’s criminal history record. In Australia, national criminal record checks are available through state and territory police departments. Overseas, different checking procedures apply in each country.

**Grooming**: the act of forming a special or power-based relationship with children with the intention of getting close to them in order to sexually abuse them.

**Interplast personnel**: this includes all employees of Interplast. It includes individuals who volunteer their services for Interplast, including medical volunteers (surgeons, anaesthetists, nurses and allied therapists) and non-medical volunteers, such as those in administrative, promotional or fundraising roles. It also includes members of the Interplast Board of Directors and all members of Interplast Committees.

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

**Particularly Vulnerable Children**: children who are particularly vulnerable to abuse, such as children with physical and mental disabilities, homeless children, child sex workers and children impacted by disasters.

**Working with Children**: working in a position that involves regular contact with children, either under the position description or due to the nature of the work environment.

## 4. Policy Statement

### 4.1 Context

Children have a right to survival, development, protection and participation as stated in the United Nations Convention on the Rights of the Child (UNCRC). The UNCRC is the universal foundation for child protection. The fundamental principle of the Convention is that children have their own indivisible rights. Interplast is committed to upholding these rights.

Child abuse is a global problem that affects both boys and girls. It has existed since the beginning of time and is deeply rooted in cultural, economic and social practices. Children are abused physically, sexually, emotionally, and through neglect. Children are forced to endure the most hazardous forms of child labour including sweat shops and prostitution. In some countries, boys are kidnapped and forced into armed conflict as soldiers. In many countries, children experience severe corporal punishment in schools. Children living in poverty are more at risk of child abuse and exploitation and, in many cases, offenders are acquainted with their victims.

- According to the World Health Organisation (2001) 40 million children below the age of 15 suffer from abuse and neglect and require social and health care.
An estimated two million children are trafficked every year. One million children enter the commercial child sex trade every year (1995 estimate). The numbers are likely to be higher now. An estimated one in five females will experience some form of sexual abuse in their childhood.

Interplast is obliged to adhere to local and international child protection criminal laws, which prohibit the abuse and exploitation of children (appendix 4). These include local laws in countries where Interplast's programs are implemented, and international laws and conventions in relation to all forms of child abuse and child exploitation, including: child sex tourism, preparatory laws, child sex trafficking, child labour and child pornography.

4.2 Responsibilities

Management:

It is the responsibility of the CEO and Board to ensure all Interplast personnel are aware of and agree to abide by this policy and applicable local procedures while working or volunteering for Interplast. The CEO must also ensure that all personnel who have contact with or impact on children are trained in and understand child protection issues, and that all personnel are recruited in line with the recruitment and screening guidelines outlined in section 5.1 of this policy.

It is the responsibility of management to ensure the risk assessment process (as outlined in Appendix 1) is followed for all Interplast programs or activities to identify and minimise potential risks to children.

It is the responsibility of the CEO (and Board if necessary) to ensure that any issues raised relating to child protection (including during the recruitment and screening process for any personnel) are addressed and documented, and any personnel who have identified child protection offences against them are not permitted to engage in Interplast activities.

Program Manager

The Program Manager is required to oversee the Program Activities Coordinators or the Program Activities Officer ensuring that all team members (including medical volunteers and observers) participating in program activities have current criminal record checks and have received the Child Protection Policy and signed the Code of Conduct prior to departing on an overseas program. All team members must have signed the Personal Information and Program Participant Agreement (online or hard-copy) which includes a section for disclosing any previous charges related to child protection offences. All new volunteers and observers must supply two referees and Program Activities Coordinators or Program Activities Officer are responsible for undertaking verbal referee checks, including questions related to child protection. They are responsible for ensuring that all program activity observers have been briefed on the child protection issues and contacts.

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in the country where they are going to. If any issue relating to a child protection offence or concern is raised through the documentation, criminal record check or referee check process, the Program Manager, Program Activities Coordinator or Program Activities Officer, in conjunction with the Interplast Child Protection Officer, is responsible for raising this concern to the CEO for further action, which may include further referee checks.

Other Personnel:

It is the responsibility of all personnel to ensure they are aware of and agree to abide by this policy and applicable local procedures while working for Interplast. All participants are responsible for reporting concerns wherever they arise, within the parameters outlined for each specific country. The welfare of the child must always come first, and if warning signs are ignored, a child may remain unprotected and subject to further abuse.

The Child Protection Officer has specific responsibilities outlined throughout this policy. The Child Protection Officer is a member of staff appointed by the CEO to fulfill the accountabilities of this role in consultation with the Board Executive. It is the responsibility of the Child Protection Officer, in conjunction with the Programs team, to maintain an up-to-date understanding of the child protection context within all countries which Interplast works, and update briefing and training material as appropriate.

The Child Protection Reporting and Response Process Flow Chart on the following page outlines who is responsible and what process should be followed. This process is described in detail in Appendix 2.

Partners

In line with the 2014 DFAT Child Protection Policy, Interplast is working towards having an agreement in place with all civil-society program partners in relation to child protection. In relation to in-country hospitals, the vast majority are state hospitals, which means they fall under the ‘Government Department’ jurisdiction and therefore are not subject to the DFAT Child Protection Policy. However, Interplast programs actively promote child protection standards in all partner agreements and MOUs, and work to raise awareness of child protection issues and reporting in all programs.

4.3 Confidentiality

All reports, the names of people involved and the details will remain confidential. Only the CEO and the Child Protection Officer will be informed of the report, as will the Program Activities Coordinator/Officer (when appropriate). Details will be released on a need-to-know basis or when required by relevant local or Australian law or a notification to police or child protection authorities is made.
This process is described in detail in Appendix 2 of this policy.
5. Policy in Practice

5.1 Recruitment and Screening

Interplast is committed to child safe recruitment, selection and screening practices. These practices aim to recruit and most suitable people to work in the programs.

For all applicants for Interplast staff positions, the relevant recruiting staff member will ensure:

- all applicants are made aware of Interplast’s Child Protection Policy and be informed of the recruitment screening requirements including through promotion of our child safe commitments in all job advertisements;
- all successful applicants for staff positions will be screened through national criminal record checks and will not commence any activity dealing with children in their position until the satisfactory completion of this check. This check will be updated every two years to maintain currency;
- all applicants will possess relevant training and/or qualifications and experience in working with children. Where they do not have this experience, they will be given training and briefings appropriate to their position by the Interplast Child Protection Officer, CEO and/or external organisations. This will take place prior to any newly recruited staff member participating in any Interplast activity during which they have direct contact with children;
- interviews will be conducted for all staff, with a preference for face-to-face interviews. Behavioural-based questions will be used to ask for examples of the candidate’s past behaviour and experiences;
- in positions working directly working with children, the panel will explore the candidate’s motivations for working with children, which will include both behavioural and value-based questions seeking information about the candidate’s attitudes to children, professional boundaries, accountability, team work and how they have responded to ethical dilemmas;
- a minimum of two reference checks will be required for all preferred candidates. This would include short and long-term positions and consultants. In the case of preferred candidates for staff positions, the candidate’s most recent employer/supervisor must be one of these referees. Interplast will verify the identity of the referee and make direct contact with each of these referees. Written references will not be accepted. Interplast reserves the right to request additional references;
- all staff, and relevant contractors/consultants will be required to sign Interplast’s Child Protection Code of Conduct, noting that they have fully read and understood it;
- sanctions for breaching the Child Protection Code of Conduct will be outlined in all employment contracts for Interplast staff; a new Child Protection Code of Conduct must be signed by Interplast medical volunteers/observers ahead of participation on each program activity to ensure they are continuously reminded of this policy and its implications;
- All new staff members will be briefed by Interplast’s Child Protection Officer on commencement, and;
Interplast reserves the right to refuse employment or terminate any person’s employment that may pose a risk to children based on criminal history or perceived/actual risk.

For Interplast medical volunteers, the relevant Program Activities Coordinator / Officer will ensure:

- all potential volunteers are made aware of Interplast's Child Protection Policy and be informed of the recruitment screening requirements including through promotion of our child safe commitments in all material for prospective volunteers;
- all successful applicants for volunteer positions will be screened through national criminal record checks and will not commence their position until the satisfactory completion of this check and these checks will be renewed every 2 years to maintain currency;
- a minimum of two reference checks will be required for all potential volunteer position candidates. Interplast will verify the identity of the referee and make direct contact with each of these referees. Written references will not be accepted. Interplast reserves the right to request additional references;
- all volunteers will be required to sign Interplast's Child Protection Code of Conduct, noting that they have fully read and understood it;
- sanctions for breaching the Child Protection Code of Conduct will be outlined in the Volunteer Protocol. A new Child Protection Code of Conduct must be signed by Interplast medical volunteers ahead of participation on each program activity to ensure they are continuously reminded of this policy and its implications; and
- Interplast reserves the right to refuse a volunteer placement or terminate any person’s volunteer position if Interplast believes that may pose a risk to children based on criminal history or perceived/actual risk.

For observers participating on Interplast program activities, the relevant Program Activities Coordinator/Officer will ensure:

- all potential observers are made aware of Interplast's Child Protection Policy and be informed of the recruitment screening requirements including through promotion of our child safe commitments in all material for prospective observers, including the Observer Guidelines;
- all successful applicants for observer positions will be screened through national criminal record checks and will not commence their position until the satisfactory completion of this check. This check will be updated every two years to maintain currency;
- a minimum of two reference checks will be required for all potential observer position candidates. Interplast will verify the identity of the referee and make direct contact with each of these referees. Written references will not be accepted. Interplast reserves the right to request additional references;
- all observers will be required to sign Interplast's Child Protection Code of Conduct, noting that they have fully read and understood it;
- sanctions for breaching the Child Protection Code of Conduct will be outlined in the Observer Guidelines. A new Child Protection Code of Conduct must be signed by
Interplast observers ahead of participation on each program activity to ensure they are continuously reminded of this policy and its implications; and

- Interplast reserves the right to refuse an observer placement or terminate any person’s observer position if Interplast believes that may pose a risk to children based on criminal history or perceived/actual risk.

For other volunteers (including fundraising, administrative and special-projects), the relevant supervising Interplast staff member will ensure:

- all potential volunteers are made aware of Interplast's Child Protection Policy and be informed of the screening requirements including through promotion of our child safe commitments when they first enquire about volunteering;
- all successful applicants for non-medical volunteer positions will be screened through national criminal record checks. This check will be updated every two years to maintain currency;
- if their volunteer position will have contact with or impact on children, applicants for these positions will demonstrate completed training related to child protection, or will receive training and briefing from the Interplast Child Protection Officer, CEO and/or external organisations prior to commencing their position;
- in positions working directly working with children, the interviews will be conducted to explore the candidate’s motivations for working with children, which will include both behavioral and value-based questions seeking information about the candidate’s attitudes to children, professional boundaries, accountability, team work and how they have responded to ethical dilemmas;
- a minimum of two reference checks will be required for all volunteer position preferred candidates. Interplast will verify the identity of the referee and make direct contact with each of these referees. Written references will not be accepted. Interplast reserves the right to request additional references;
- all non-medical volunteers will be required to sign Interplast's Child Protection Code of Conduct, noting that they have fully read and understood it;
- sanctions for breaching the Child Protection Code of Conduct will be outlined in all volunteer agreements for non-medical volunteers; and
- Interplast reserves the right to refuse a volunteer position or terminate any person’s volunteer position if Interplast believes that the individual may pose a risk to children based on criminal history or perceived/actual risk.

National Police Checks

On commencement, or prior to a program activity, a valid Australian Federal Police Check (NPC) or New Zealand Ministry of Justice Criminal Record Check is a basic requirement for all Interplast staff, medical volunteers and observers. In Australia, as of 30 July 2013, the checks are done through CrimCheck, who provide background checks including spent convictions and identify if there are any pending court cases against the individuals.

Individuals are required to give their consent to a police check and must be informed of the purpose for which the resulting police clearance certificate will be used, including being sighted by Interplast. All information relating to criminal record checks must be
handled in accordance with Interplast’s Privacy Policy. Police clearance certificates will be kept on file and considered valid for a period of two years. The CEO has the authority to request a new police check within the two year period at any time as deemed necessary.

Interplast will cover the costs of police checks for Interplast funded volunteers and staff and authorised observers only.

Should a police check reveal criminal issues that relate to children or raise concerns about the candidate’s suitability for the role, Interplast has the right to either refuse employment or a volunteer/observer placement to the candidate on that basis.

Sanctions

Where this policy or the Code of Conduct has been breached by any Interplast personnel, the Interplast Board of Directors may decide to remove or suspend paid staff (on full pay) and remove or suspend volunteers or observers from any program activity while a case is being assessed or where a child’s safety is at risk. During any formal investigation period they will not be accepted as team members. However, this action is to be taken as a matter of precaution not a judgement of guilt.

After due investigation by the relevant authorities, volunteer team members or observers who are found to have put children at risk or abused children will not be accepted for further Interplast program activities.

Where a potential team member, who is an overseas resident or citizen, is suspended from duty in their home country, they will not be included in any program activity in that country. If they have local authorisation to work normally without restriction in their home country, they will be able to participate as a local representative counterpart in program activities in their own country. However, they would not be included in any program team activities in another country in the region, until they were cleared.

Interplast may consider the following sanctions where this policy and/or the Child Protection Code of Conduct have been breached by Interplast employees - suspension, transfer, demotion and/or dismissal.

5.2 Local Child Protection Policy Requirements

In each country where Interplast works, it must develop a summary of country-specific child protection information which includes:

- local child protection legislation;
- a list of local organisations working in child protection or child welfare;
- local child helplines or contact numbers;
- a list of police contacts; and
- Australian consulate or embassy details.

Appendix 3 of this policy has further information on this process.
5.3 Child Photo and Story Requirements

Interplast will, at all times, portray children in a respectful, appropriate and consensual way.

When photographing or filming a child for work-related purposes, staff must:

- before photographing or filming a child, assess and endeavour to comply with local traditions or restrictions for reproducing personal images;
- before photographing or filming a child, obtain consent from the child (where they are 16 years and older) or a parent or guardian of the child (if they are younger than 16 years old). If the child is old enough to understand and make decisions but under the age of 16, the photographer should ensure that the child is also happy to have their image taken and used. As part of this they must explain how the photograph or film will be used;
- ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive;
- ensure images are honest representations of the context and the facts; and
- ensure file labels do not reveal identifying information about a child when sending images electronically.

Our guidelines on the use of children’s images are in line with the ACFID Code of Conduct Clause 2.6 and the DFAT Child Protection Policy. Guidelines for any individual who is taking or using photos or stories of children related to an Interplast initiative will adhere to these principles.

6. Monitoring and Reviewing the Child Protection Policy

Interplast’s Child Protection Policy will be reviewed every two years. The CEO will manage the review of the Child Protection Policy and staff will be consulted in this process.

The Child Protection Officer is accountable to the CEO and Board for managing and maintaining this policy. Where compliance issues surface, the Child Protection Officer will work with staff and other relevant stakeholders to address these issues promptly.

All staff members are accountable for understanding and adhering to this policy in their daily work.
I, ___________________________, engaged by Interplast, agree that while implementing Interplast activities, I will:

- Treat 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, abusive, sexually provocative, demeaning or culturally inappropriate;
- Not engage children in any form of sexual activity or acts, including paying for sexual services or acts, where under the law(s) applicable to the child (including the Crimes Legislation Amendment (Sexual Offences Against Children) Act 2010), the child is below the age of consent or the act(s) are an offence under relevant laws;
- Wherever possible, ensure another adult is present when working in the proximity of children;
- Not invite unaccompanied children into my home, hotel or a remote or isolated area unless they are at immediate risk of injury or in physical danger;
- Not sleep close to unsupervised children;
- Use any computers, mobile phones or video and digital cameras inappropriately and never to exploit or harass children or to access child pornography through any medium;
- Refrain from physical punishment or discipline of children (excluding my own children);
- Refrain from hiring children for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury;
- Comply with all relevant Australian and local legislation, including labour laws in relation to child labour;
- Immediately report concerns or allegations of child abuse in accordance with appropriate procedures.

By signing this declaration, I confirm and accept:

- I shall abide by all the standards and guidelines of this policy, including the Child Story and Photo guidelines and procedures in the attached appendices.
- My failure to comply with the standards of the Child Protection Policy and Code of Conduct may result in disciplinary action.

______________________________________________________________
Signature

_________________________________________
Full Name (print)
In assessing child safety risks, Interplast is aware that programs that work directly with children have a higher risk profile. As an organisation working with and for communities, Interplast recognises its duty of care to take all reasonable steps to ensure that children in contact with our activities are free from the risk of harm, abuse or exploitation. To achieve this, the relevant Interplast Program Activities Coordinator will:

- assess the child safety risks in existing and emerging programs and projects (and in the communities in which they are implemented) - it should be included in existing program and imitative risk assessment;
- manage child safety risks identified in its programs through implementation of child protection measures (outlined within this CPP) and take other actions as required; and
- continually assess and actively minimise situations where children are exposed to the risk of harm, abuse or exploitation.

Low/Acceptable Risks – should be monitored and periodically reviewed to ensure they remain acceptable.

Medium Level Risks – require more intervention to move them to the low risk end of the continuum.

High Level Risks – require even greater intervention.

Examples are outlined below:

<table>
<thead>
<tr>
<th>Low/Acceptable Risks</th>
<th>Medium Level Risks</th>
<th>High Level Risks</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Older less dependent and able bodied children</td>
<td>- Younger, more dependent children</td>
<td>- Very young and/or vulnerable children</td>
</tr>
<tr>
<td>- Take place in full view of others in an open environment</td>
<td>- View of activity is obscured</td>
<td>- Take place out of sight</td>
</tr>
<tr>
<td>- High adult/child ratios</td>
<td>- Minimal supervision</td>
<td>- Involve bathing or toileting</td>
</tr>
<tr>
<td>- Active parent involvement</td>
<td>- Less parent involvement</td>
<td>- Low adult/child ratio</td>
</tr>
<tr>
<td>- No bodily contact</td>
<td>- Policies and procedures are not actively implemented</td>
<td>- No supervision</td>
</tr>
<tr>
<td>- Active staff supervision</td>
<td>- Physical activities with children present</td>
<td>- Overnight stay</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Take place in a private home or in an isolated setting</td>
</tr>
</tbody>
</table>
The below matrix can be used to assess risk for each activity. The first is an example.

<table>
<thead>
<tr>
<th>Activity (Example)</th>
<th>Risks</th>
<th>Level of Risk</th>
<th>Reducing the Risk</th>
<th>Priority</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medical assessment of a child</td>
<td>No parent, or if the parent leaves the room. Physical contact</td>
<td>Low - Medium</td>
<td>Ensure at least one parent or another team member remains in the room</td>
<td>Medium</td>
</tr>
</tbody>
</table>
The first concern should always be for the best interests of the child.

What should be reported?

- Any disclosure or allegation from a child/community member or staff regarding the safety/abuse/exploitation of a child;
- Any observation of concerning behaviour exhibited by an Interplast staff, volunteer or other relevant stakeholder that breaches the Child Protection Policy and Code of Conduct;
- Inappropriate use of the organisation’s photographic equipment or computers including evidence of child pornography; and
- Staff engaging in suspicious behaviour that could be associated with sexual exploitation or trafficking.

Who to report to?

Child abuse reports and concerns should be made to the relevant Program Activities Coordinator. They should notify the nominated Child Protection Officer for Interplast in Australia as per the Child Protection Report and Response Flow Chart in Section 4.4 of this policy and the reporting table below. The Child Protection Officer should ensure the response procedure is followed and there is correct documentation of any allegation or concern. Where appropriate, they should also notify the CEO.

Alternatively, reports or concerns may be made directly to the nominated Child Protection Officer for Interplast.
<table>
<thead>
<tr>
<th>Description</th>
<th>Response</th>
<th>Escalation – Who and When</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allegation of abuse or exploitation of a child by Interplast staff or of a</td>
<td>Report required</td>
<td>Program Coordinator immediately. Child Protection Officer</td>
</tr>
<tr>
<td>child involved in Interplast or partner organisations’ activities by an</td>
<td></td>
<td>immediately. CEO immediately. Board immediately.</td>
</tr>
<tr>
<td>external actor.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Disclosure of suspicion of abuse or exploitation of a child by Interplast</td>
<td>Report required</td>
<td>Program Coordinator immediately Child Protection Officer</td>
</tr>
<tr>
<td>staff, or of a child involved in Interplast or partner organisation</td>
<td></td>
<td>within 12 hours. CEO as required. Board as required.</td>
</tr>
<tr>
<td>activities by an external actor.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Witnessed or reported allegation of abuse or exploitation of a child</td>
<td>Report required</td>
<td>Program Coordinator within 24 hours. Child Protection Officer</td>
</tr>
<tr>
<td>external to an Interplast activity, not involving Interplast staff or</td>
<td></td>
<td>within 36 hours.</td>
</tr>
<tr>
<td>partner organisation staff.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Reporting of child abuse allegations overseas**

- The first step must always be to protect the best interests of the child. Once an allegation is made, there should be an immediate response that protects the child from further potential abuse or victimization. The best interests of the child may warrant the standing down of a staff member or volunteer.
- A local reporting procedure (e.g. to local authorities) will guide the process based on whether the allegation constitutes a criminal offence in the country, or if it is a breach of the Interplast Child Protection Code of Conduct and will be dealt with as a disciplinary matter.
- Concerns should be raised immediately prior to completing paperwork. Child abuse reports should be made initially to the Program Coordinator and followed up using the Interplast Child Protection Incident Form (Appendix 5 of this policy).
- The Program Activities Coordinator should gather all the relevant information and address any health and protection needs of the child.
- The matter may be directly referred to the local police and or authorities if the allegations are considered to be criminal offences.
- If the incident has occurred outside of the program (such as an incident witnessed by a volunteer) the matter will be referred to an external body or authority dealing with child protection matters within the country.

**When to report?**

- Child abuse concerns should be raised immediately.
How should it be reported?

- Verbally and by completing the Interplast Child Protection Incident Form (Appendix 6).

What will happen next?

- The Child Protection Officer, in consultation with the Program Activities Coordinator and/or CEO, will discuss the allegations and then decide upon the next step. This may involve:
  - interviewing the person/persons who made the allegations or other witnesses to gather more information with which to make a decision. Notes of any interview must be taken and transcribed onto an incident report form;
  - reporting to local police and or child protection authority;
  - making a report to the Australian Federal Police;
  - handling any concerns about staff internally, if it is not a criminal matter; and
  - no further action needing to be taken.
- Interplast will treat all concerns raised seriously and ensure all parties are treated fairly and the principles of natural justice will be a prime consideration.
- All discussions and concerns will be documented through an Incident Report Form.
- All reports will be handled professionally, confidentially and expediently.
- All reports made in good faith will be viewed as being made in the best interests of the child regardless of the outcomes of any investigation. Interplast will ensure the interests of anyone reporting child abuse in good faith are protected.
- Any individual who intentionally makes false and malicious allegations will face disciplinary action.

How to respond to a disclosure by a child?

- If a child/young person discloses that he or she has been abused, they may be feeling scared, guilty, ashamed, angry and powerless. You, in turn, may feel a sense of outrage, disgust, sadness, anger and sometimes disbelief.
- If a child discloses abuse, whatever the outcome, the child must be taken seriously.
- It is important for you to remain calm and in control and to reassure the child/young person that something will be done to keep him or her safe.
- When a child or young person discloses they are being harmed, you can show your care and concern for the child/young person by:
  - listening carefully;
  - telling the child/young person you believe him or her;
  - telling the child/young person it is not their fault and he/she is not responsible for the abuse; and
  - telling the child/young person you are pleased he/she told you.
- Try and obtain some details such as where the abuse is taking place (school, home, work), whether it is currently occurring or did occur in the past and the name of the perpetrator if possible, but not necessary.
- It is possible that some children or young people will make a disclosure and then ask you not to tell anyone. It is important you seek guidance from the Program Activities Coordinator and/or CEO.
Coordinator to discuss how the child or young person can be supported and the disclosure managed.

You will **not** be helping the child/young person if you:

- make promises you cannot keep, such as promising that you will not tell anyone;
- push the child/young person into giving details of the abuse. Your role is to listen to what the child/young person wants to tell you and not to conduct an investigation (beware of asking any leading questions as this may prejudice any subsequent investigation); and
- indiscriminately discuss the circumstances of the child/young person with others not directly involved.

**Other actions to take:**

- Protect the child - once an allegation is made, there should be an immediate response that protects the child from further potential abuse or victimization. The child may require medical assistance or counselling support. Where possible, the child should remain in the place of residence or relevant program. Exceptions may be made where the child is deemed to be at risk of victimization by peers as a result of the allegation or because the alleged abuse has occurred in home-based care. If the child is in immediate danger you should make arrangements for the child to go to a safe place.
- Distance the alleged perpetrator - the best interest of the child may warrant the standing down of a staff member or volunteer. Any staff member stood down in this manner continues to receive full pay. This measure recognizes that the member is entitled to a just process that does not pre-judge guilt or innocence. Any volunteers who are stood down should similarly receive any reasonable reimbursement of costs.
This tool should be used as a framework to guide and ensure an effective child protection approach for each country where Interplast conducts its programs and activities. The aim is to identify the local child protection context, including the arrangements and resources for the protection of children and the investigation, including criminal investigations, of child protection concerns and allegations.

Details to be recorded should include:

**Summary**
A summary and brief analysis of the main child protection risks and issues facing children locally needs to be developed. This should include details of commonplace/culturally accepted practices that may be harmful or shocking to Interplast staff and volunteers.

**Child Protection – Statutory Bodies**
Details of any government bodies or agencies with statutory authority for the protection of children, including names and contact details of senior officers and local police bodies need to be documented. A summary of local legislation (and international legislation that the country is a signatory to) governing the welfare/protection of children should be included. Additionally, a brief analysis of how effective the enforcement of legislation is, if known, should be included.

**Other Agencies – Health Services, NGOs, Interagency Forums**
Details of health and other services that may be accessed as part of victim response, including names and contact details of NGOs, other agencies, other relevant bodies and professional networks, including any local joint arrangements for dealing with child protection issues should be recorded.

**Community**
Details of informal/community based justice and protection mechanisms, and how these function, need to be documented. On completion of the mapping exercise, these details should be used to form the basis of country-specific child protection information to be used in conjunction with the Interplast Child Protection Policy. Copies should be made available to all staff within the country program and sent to and held by the Child Protection Officer at Interplast's head office. These details should be updated annually.

It is recommended a local child protection chart be developed for each country (ideally one A4 page) which details the key elements of the local policy including local reporting guidelines. This should be displayed in key areas.
CHILD PROTECTION POLICY
Appendix 4: Australian Legislation Relating to Sexual Abuse of Children

- **Criminal Code Act 1995, Division 474:**
  This Act provides for a penalty of 10 years’ imprisonment for possession of child pornography depicting a person under 18 years of age and up to 15 years’ imprisonment for online grooming of a person under 16 years of age.

- **Crimes Legislation Amendment (Sexual Offences Against Children) Act 2010:**
  This repealed the Crimes Act 1914 Part IIIA (Child Sex Tourism), and inserted expanded provisions previously contained therein into new divisions of the criminal code, namely Divisions 272 and Division 273. Under this Act, it is a crime for Australians to engage in, encourage, or benefit from sexual activity with persons under 16 years of age while overseas. The law provides for penalties of up to 17 years’ imprisonment and up to $561,000 in fines for companies. It also makes the act of preparing to travel with the intent of committing child sex offences punishable by law.

- **Criminal law and child protection legislation, state and territory:**
  - The Children and Young Persons (Care and Protection) Act, 1998 (NSW)
  - Children, Youth and Families Act, 2005 (VIC)
  - The Child Protection Act, 1999 (QLD)
  - Children and Community Services Act, 2004 (WA)
  - Children’s Protection Act, 1993 (TAS)
  - Children and Young Persons Act, 1999 (ACT)
  - The Community Welfare Act (NT).

- **Local (international) legislation:**
  Most countries in which Interplast sends programs have legislation pertaining to illegal child abuse. When working in-country, all Interplast personnel are required to abide by local legislation, including labour laws, with regards to child labour.

- **Interplast adheres to the following International Child Protection Instruments:**
  - The United Nations Convention on the Rights of the Child (UNCRC)
  - Geneva Declaration of the Rights of the Child
  - ILO Convention 182 Concerning the Prohibition and Immediate Action for the Elimination of the worst Forms of Child Labour
In addition to the legislative frameworks, Interplast is a signatory to ACFID’s Code of Conduct. Interplast therefore commits to meeting the child protection standards outlined in Section B.3.4 of the ACFID Code of Conduct. As a DFAT accredited NGO, Interplast also complies with DFAT’s mandatory child protection compliance standards.
The applicant has submitted your name to us to act as a character reference with particular regard to child protection issues. Interplast is required to maintain the highest standards in relation to background checks of all volunteers and personnel, as part of our child protection responsibilities.

We would be extremely grateful if you could cooperate with answering some questions as openly and honestly as possible.

Please note that this is a character reference only and you are therefore not expected to comment on the applicant’s professional abilities. Please be assured that this information will be kept strictly confidential and destroyed when the applicant ceases to work or volunteer for Interplast Australia & New Zealand.

Applicant Name: ________________________________________________________________

Referee Name: ________________________________________________________________

Interviewer: _________________________________________________________________

Verbal Interview Date (dd/mm/yyyy): ____________________________________________

A. Knowledge of the Applicant

1. How long have you known the applicant?

___________________________________________________________________________

___________________________________________________________________________

2. In what capacity have you known the applicant?

___________________________________________________________________________

___________________________________________________________________________
B. Ability to Work in Challenging Conditions

3. Please comment on the applicant's ability to adapt and work under difficult and changing conditions.

C. Child Protection

4. All volunteers will have direct and indirect access to extremely vulnerable children. To your knowledge, in the past, has there ever been any issue or incident with the candidate involving his or her contact with children?

5. Do you have any reason to believe that the candidate may not be an appropriate volunteer for Interplast in the future, because of concerns relating to their contact with children?

D. Additional Comments and Supporting Information
<table>
<thead>
<tr>
<th>Name of complainant:</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>Address/contact details:</td>
<td></td>
</tr>
<tr>
<td>Age:</td>
<td></td>
</tr>
<tr>
<td>Sex:</td>
<td></td>
</tr>
<tr>
<td>Name of alleged victim (if different from complainant):</td>
<td></td>
</tr>
<tr>
<td>Address/contact details:</td>
<td></td>
</tr>
<tr>
<td>Age:</td>
<td></td>
</tr>
<tr>
<td>Sex:</td>
<td></td>
</tr>
<tr>
<td>Name(s) and address of parents, if applicable:</td>
<td></td>
</tr>
<tr>
<td>Has the alleged victim given consent to the completion of this form?</td>
<td>Yes ☐ No ☐</td>
</tr>
<tr>
<td>Date of incident(s):</td>
<td></td>
</tr>
<tr>
<td>Time of incident(s):</td>
<td></td>
</tr>
<tr>
<td>Location of incident(s):</td>
<td></td>
</tr>
<tr>
<td>Physical &amp; emotional state of victim (describe any cuts, bruises, lacerations, behaviour and mood):</td>
<td></td>
</tr>
<tr>
<td>Witnesses’ names and contact information:</td>
<td></td>
</tr>
<tr>
<td>Question</td>
<td>Answer</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>Brief description of incident(s) (attach extra pages if necessary):</td>
<td></td>
</tr>
<tr>
<td>Name of accused person(s):</td>
<td></td>
</tr>
<tr>
<td>Job title of accused person(s):</td>
<td></td>
</tr>
<tr>
<td>Organisation accused person(s) works for:</td>
<td></td>
</tr>
<tr>
<td>Address of accused person(s) (if known):</td>
<td></td>
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<tr>
<td>Age:</td>
<td></td>
</tr>
<tr>
<td>Sex:</td>
<td></td>
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<tr>
<td>Have the police been contacted?</td>
<td>Yes ☐</td>
</tr>
<tr>
<td>If yes, what happened?</td>
<td></td>
</tr>
<tr>
<td>If no, does the alleged victim want police assistance, and if not, why?</td>
<td></td>
</tr>
<tr>
<td>Has the alleged victim been informed about available medical treatment?</td>
<td>Yes ☐</td>
</tr>
<tr>
<td>If yes, has the alleged victim sought medical treatment for the incident?</td>
<td>Yes ☐</td>
</tr>
<tr>
<td>If yes, who provided treatment?</td>
<td></td>
</tr>
<tr>
<td>What immediate security measures have been undertaken for victim?</td>
<td></td>
</tr>
<tr>
<td>Who is responsible for ensuring safety plan (name, title, organisation):</td>
<td></td>
</tr>
<tr>
<td>Any other pertinent information provided in interview (including contact made with other organisations, if any):</td>
<td></td>
</tr>
<tr>
<td>Details of referrals and advice on health, psychosocial, legal needs of victim made by person completing report:</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td></td>
</tr>
<tr>
<td><strong>Report completed by:</strong> (name, position, organisation, date, time, location)</td>
<td></td>
</tr>
<tr>
<td><strong>Has the complainant been informed about the organisation’s procedures for dealing with complaints?</strong>  Yes ☐  No ☐</td>
<td></td>
</tr>
<tr>
<td><strong>Complainant’s consent for data to be shared with other entities (check any that apply):</strong>  Police ☐  Other (specify) ☐________________________</td>
<td></td>
</tr>
<tr>
<td><strong>Date report forwarded to relevant management structure:</strong></td>
<td></td>
</tr>
</tbody>
</table>


### *Revisions to Child Protection Policy*

<table>
<thead>
<tr>
<th>Nature of proposed revisions</th>
<th>Date on which CEO endorsed</th>
<th>Date on which Board approved</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initially approved</td>
<td>6 November 2012</td>
<td>12 November 2012</td>
</tr>
<tr>
<td>Minor grammatical and wording changes</td>
<td>28 August 2013</td>
<td>3 September 2013</td>
</tr>
<tr>
<td>Minor grammatical and wording changes. References to Program Activities Officer (newly created position) included. AusAid references replaced by DFAT</td>
<td>1 September 2014</td>
<td>9 September 2014</td>
</tr>
<tr>
<td>Minor grammatical and wording changes. Need for referee checks every three years deleted as police checks are performed every two years. Interplast also reserved its right to perform regular, ad hoc referee checks</td>
<td>12 August 2015</td>
<td>18 August 2015</td>
</tr>
<tr>
<td>Minor wording changes and amendments to ordering in reporting processes and clarification about ensuring children are happy to have their photo taken (even if parent has said yes). P.12 Inclusion of reference on first page to where process for child protection and response can be found in document for easy reference.</td>
<td>29 July 2016</td>
<td>16 August 2016</td>
</tr>
</tbody>
</table>
*This Policy will be reviewed and adjusted, as required, by the CEO, staff and Board on an annual basis.