

CHILD PROTECTION POLICY



ORGANISATION:	Kokoda Track Foundation
ACN:	103 660 948
POLICY TITLE:	Child Protection
VERSION:	13.0
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ALLIED POLICIES / PROCEDURES:	Code of Conduct Child Protection Code of Conduct Child Protection & Prevention of Sexual Exploitation, Abuse & Harassment Allegation Management Procedures Working with Communities Policy Communications and Media Policy Life Stories & Photography Guidelines Partnerships Policy HR Policies Whistleblower Policy Complaints Handling Policy
OWNER:	CEO
APPROVED BY:	Board
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INTRODUCTION

Kokoda Track Foundation (KTF) is an Australian development organisation that implements programs in Papua New Guinea (PNG) aimed at helping to improve the lives and futures of communities. A number of these programs involve direct interaction with children.

This policy outlines KTF's policy in committing to protect all children supported by KTF from abuse and exploitation by its personnel, including (but not limited to) its staff, directors, volunteers, contractors, partners and donors. KTF considers the impacts and risks for children in the development and planning of all programs and their implementation, monitoring and review.

POLICY STATEMENT

KTF is committed to the protection of children from harm, abuse and exploitation. KTF is committed to taking all necessary steps to ensure that all children and young people with whom we work are provided a child safe environment at all times.

PURPOSE

This Child Protection Policy has been developed to provide a practical guide to prevent harm towards children in KTF's programs. It outlines a range of Child Protection risk management strategies that are to be implemented at all times to reduce the risk of children being harmed. It provides guidance on how to respond to concerns, reports and allegations of child abuse and provides guidance to KTF personnel on how to work respectfully and effectively with children.

GUIDING PRINCIPLES

- KTF believes that any form of child abuse and exploitation is unacceptable and will not be tolerated.
- KTF believes that all children should be equally protected regardless of their gender, nationality, religious or political beliefs, age, sexual orientation, ability, family and social background and culture, economic status, physical or mental health and criminal background.
- The protection of children is the responsibility of all personnel, partners and associates of KTF.
- All prospective personnel shall be made aware of KTF's commitment to child protection and are subject to the outcome of a criminal background / working with children / police check (in accordance with relevant State/Provincial and Federal/National laws). In limited circumstances it may prove impossible to obtain a reliable criminal record check. A statutory declaration, or local legal equivalent, outlining efforts made to obtain a foreign police check, and disclosing any charges and spent convictions related to child exploitation, may be accepted instead (upon the discretion of the CEO and/or Child Protection Working Group).
- In the best interest of children, KTF will not knowingly employ or engage anyone with a conviction for child abuse, paedophilia, or related offences.
- KTF will undertake in-depth risk assessment related to child safeguarding for all of its programs and will regularly monitor implementation of risk mitigation strategies and risk outcomes.
- Where possible, children will be consulted in the development of the Child Protection Policy and the implementation of child safe practices. Children in our programs should be given opportunities to express their views on matters affecting them.
- Adherence to this Child Protection Policy is a mandatory requirement for all personnel, partners and associates of KTF.

SCOPE

This policy applies to the following:

1. All personnel and associates of KTF:
 - Permanent, part-time and casual staff
 - Individual contractors and consultants
 - Volunteers
 - Board members
 - Partners with a formal / contractual relationship with KTF
 - Interns
 - Work experience students
2. For others engaged by KTF (known as 'representatives') having contact with children such as:
 - Journalists and media personnel
 - Photographers
 - Donors
 - Supporters
 - Guest presenters
 - Visitors including the spouse / partner or family member of KTF personnel or associates

The policy does not need to be signed by people engaged by KTF who will have no contact with children. These people must be made aware of the policy and required to sign and adhere to it if their contact with children status changes.

DEFINITIONS

Child Protection: is the term used to describe the responsibilities and activities undertaken to prevent or stop children from any form of harm, particularly arising from abuse, neglect, and/or exploitation.

Child Safeguarding: actions, policies and procedures that create and maintain protective environments for children including to protect them from exploitation and abuse of all kinds.

Child Abuse: abuse happens to male and female children of all ages, ethnicity and social backgrounds, abilities, sexual orientation, religious beliefs and political persuasion. Child abuse includes physical abuse, sexual abuse, emotional abuse, neglect, bullying, child labour and family violence. Abuse can be inflicted on a child by both men and women, as well as by children/young people themselves. Professionals and other adults working with children in a position of trust can also abuse children.

A Child or Young Person: any person under the age of 18 years.

Duty of Care: is a common law concept that refers to the responsibility of the organisation to provide children with an adequate level of protection against harm. It is the duty of the organisation to protect children from all reasonably foreseeable risk, including abuse, neglect, exploitation, grooming, and/or injury.

Emotional Abuse: occurs when a child is repeatedly rejected or frightened by threats including inappropriate verbal or symbolic acts toward a child, or a pattern of failure over time to provide a child with adequate non-physical nurture or emotional availability. This may involve name calling, being put down or continual coldness from parent, responsible adult or caregiver; to the extent that it affects the child's physical and emotional growth.

Employee: any person who provides services for compensation to KTF and whose duties are under the direction of the KTF.

Exploitation: Commercial or other exploitation of a child refers to the use of the child in work or other activities for the benefit of others that are to the detriment of the child's physical and mental health, education, or moral and social-emotional development. It includes, but is not limited to, child labour, child trafficking, and child sexual exploitation.

Grooming: A behaviour that makes it easier for an offender to procure a child, or who the offender believes to be a child, for sexual activity. This can occur in person or through electronic communication. For example, an offender might build a relationship of trust with a child, and then seek to sexualise that relationship; including but not limited to, encouraging romantic feelings or exposing the child to sexual concepts through pornography.

Harm: Any detrimental effect on a child's physical, psychological, or emotional wellbeing. Harm may be caused by physical, emotional, financial, or sexual abuse, neglect, and/or exploitation whether intended or unintended.

Neglect: is the persistent failure or the deliberate denial to provide the child with clean water, food, shelter, sanitation or supervision or care (where the adult or caregiver is in a position to do so) to the extent that the child's health and development are placed at risk.

Physical Abuse: occurs when a person purposefully uses physical force or threatens to use physical force against a child or young person that results in – or has a high likelihood of resulting in – harm to the child. This may take the form of slapping, punching, shaking, kicking, burning, shoving or grabbing. The injury may take the form of bruises, cuts, burns or fractures.

Sexual Abuse: occurs when a child or young person is used by an older or bigger child, adolescent or adult for their own sexual stimulation or gratification - regardless of the age of majority or age of consent locally. These can be contact or noncontact acts, including sexualised language, voyeurism, fondling genitals or breasts, masturbation, oral sex, vaginal or anal penetration by a penis, finger or any other object and exposing a child to, or involving a child in pornography.

Volunteer: Any person who enters into KTF's programs, or offers any service of their own free will, and who does not receive compensation for such a service.

**Note the above definitions of Child Abuse, Emotional Abuse, Exploitation, Neglect, Physical Abuse and Sexual Abuse includes a child or children being present (hearing or seeing) while a parent or sibling is subjected to any of the above.*

POLICY IN ACTION

CODE OF CONDUCT

KTF personnel are responsible for maintaining a professional role with children, which means establishing and maintaining clear professional boundaries that serve to protect everyone from misunderstandings or a violation of the professional relationship.

All KTF personnel who come into contact with children must sign and adhere to [KTF's Child Protection Code of Conduct](#). The Child Protection Code of Conduct clearly outlines what is acceptable and unacceptable behaviour in relation to working with children and young people. All KTF personnel and representatives must abide by the Child Protection Code of Conduct in their activities with KTF for all children anywhere and at any time.

PERSONNEL ENGAGEMENT PROCEDURES

Recruitment and screening of personnel and associates must reflect KTF's commitment to protect children by ensuring checks and procedures are in place to screen out anyone who may be unsuitable to be in contact with children and young people and attract the safest people who are committed to child safeguarding and who share KTF's values.

This policy commits KTF to preventing a person from working with children if they pose an unacceptable risk to children. All employment contracts must contain provisions for dismissal, suspension or transfer to other duties for any personnel who breach the Child Protection Policy or Child Protection Code of Conduct.

The following principles must be adhered to by KTF in recruitment of all KTF personnel including employees, directors, consultants, contractors, volunteers and partners:

1. All prospective personnel shall be made aware of KTF's commitment to child protection and are subject to the outcome of a criminal background / working with children / police check (in accordance with relevant State/Provincial and Federal/National laws). In limited circumstances it may prove impossible to obtain a reliable criminal record check. A statutory declaration, or local legal equivalent, outlining efforts made to obtain a foreign police check, and disclosing any charges and spent convictions related to child exploitation, may be accepted instead (upon the discretion of the CEO and/or Child Protection Working Group). 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.
2. In the best interest of children, KTF will not knowingly employ or engage anyone with a conviction for child abuse, paedophilia, or related offences.
3. All prospective employees, volunteers, partners, and board directors will be interviewed to determine suitability. Child safeguarding will be addressed in job advertisements, applications, interviews and references.
4. All interviewed applicants will be required to affirm their support of KTF's commitment to child protection and demonstrate an understanding of its application during interview.
5. Prior to an employment (paid or voluntary) or directorship offer being made, appropriate character reference checks of the prospective employee or director shall be conducted. All nominated referees will be asked whether, to their knowledge, there is anything in the prospective appointee's character / past that could be considered inappropriate for someone working with KTF (and in particular, working with children). Targeted / behavioural based interview questions will be used to determine attitudes, motivations, and values in regards to children and

young people and working with them. Referees will be specifically asked if they are aware of any breaches of child safeguarding policy by the prospective employee / volunteer / director.

6. A minimum of two verbal referee checks will be required for all preferred candidates in positions that have contact with children. This would include short- and long-term positions, volunteers on placement and consultants. The candidate's most recent employer/supervisor must be one of these referees. KTF will verify the identity of the referee and make direct contact with each of these referees. Written references will not be accepted. KTF reserves the right to request additional references.
7. Prior to an offer of employment (paid or voluntary) or directorship being made, the successful applicant's criminal background / working with children check results shall be considered before the position is formally occupied. In limited circumstances it may prove impossible to obtain a reliable criminal record check. A statutory declaration, or local legal equivalent, outlining efforts made to obtain a foreign police check, and disclosing any charges and spent convictions related to child exploitation, may be accepted instead (upon the discretion of the CEO and/or Child Protection Working Group).
8. During the induction process, all employees, volunteers, interns and directors will be issued with KTF's Code of Conduct and Child Protection Code of Conduct and be required to read, understand, sign and adhere.
9. All positions will be subject to a probationary period depending on the length of the contract.
10. Child protection will be included in staff performance reviews.
11. KTF reserves the right to refuse employment or terminate any person's employment that may pose a risk to children. Employment contracts will contain provisions for the prevention of a person working with children if they present an unacceptable risk to children. This may include suspension or transfer to other duties for any employee who is under investigation and provisions to dismiss any employee after an investigation or who breaches KTF's Child Protection Policy or Child Protection Code of Conduct.

RISK ASSESSMENT

Risk management is an ongoing part of KTF's approach including work involving and affecting children. In the interest of preventing risk, KTF conducts a child protection and safeguarding risk assessment as part of the development of all new projects. Mitigation strategies are put in place for any risk identified and these (and any emerging risks) are actively monitored throughout the activity/program cycle, at least on a quarterly basis. Guidelines on conducting a child protection risk assessment guidelines are [located here](#). Senior Managers are to utilise KTF's Child Protection Risk Screening Tool to determine the child protection risk and whether a full assessment of Child Protection Risk and application of all of DFAT's nine minimum Child Protection Standards is required.

USE OF VISUAL IMAGES AND CASE STUDIES OF CHILDREN:

KTF will at all times portray children in a respectful, appropriate and consensual way. A child should always be portrayed in a dignified and respectful manner and not in a vulnerable or submissive manner.

When taking images of children (photography, video, other), KTF personnel and associates must adhere to KTF's Photography & Life Stories Guidelines. In particular, the following guidelines must be adhered to:

- KTF will always ask permission when taking photographs or recording video footage of individuals (including children) in PNG;
- Consent for taking and using photographs and case studies of children will be sought directly from parents or teachers at the child's school;
- KTF will always explain to the subject the likely use of the images or video footage;
- KTF will never take pictures of people who say they do not want to be photographed or filmed;
- Children will be adequately clothed and not in poses that could be seen as sexually suggestive;
- KTF will not manipulate the subject in a way that distorts the reality of the situation;

- KTF is always sensitive to the concerns and advice of our PNG staff and partners in gathering and use of visual material;
- There should be no identifying information of the child used in the publication of images. This includes the child's family name, community or school name;
- KTF will always aim to use only high-quality images;
- KTF may use digital manipulation of images for creative effect, but not in a way that deliberately and misleadingly distorts the reality of the situation depicted;
- KTF will not crop an image in a way that misleadingly distorts the reality of the situation;
- In video editing, KTF does not misleadingly distort the reality of the situation;
- Images will be current and appropriate;
- KTF employees will ensure the privacy of personal information concerning children including their name and location, when sending and storing images electronically and when using images publicly.

CHILD SAFEGUARDING TRAINING & EDUCATION

KTF is committed to training and educating its personnel and representatives about child protection and abuse, KTF's Child Protection Policy and Code of Conduct, how to reduce risks, and how to create child safe environments. We will promote child safe practices which keep children safe in the organisation and in their own community, and provide information about child protection to the children and communities in which we work.

KTF personnel are required to participate in child protection training as part of their induction, in annual intensive workshops and in refresher and targeted training depending on their role or contact with children.

Staff with specialist child safeguarding responsibilities, including KTF's Child Protection Officer, will be supported to attend child safeguarding training delivered externally to stay informed of current practice.

KTF commits to undertake capacity building and training in child safeguarding with all development partners who work with us to implement programs that involve or affect children.

PARTNERS' ENGAGEMENT AND RESPONSIBILITIES

For the purpose of the policy, partners are defined as those with whom formal relationships, including funding agreements and memorandum of agreements, are held for implementing projects. These may include but are not limited to:

- Academic and research institutions
- International Non-Government Organisations (INGOs)
- Local Non-Government Organisations (NGOs) and Community Based Organisations
- Government bodies (National, Provincial or Local)
- Churches and other interfaith groups
- Partners and subcontractors who are engaged by KTF to perform any part of an activity (including DFAT Australian Aid funded activities)

KTF determines a partners' status as a child safe organisation by including child safeguarding in the partner capacity assessment and appraisal processes and commits to strengthening partners capacity to protect children in our programs by investing in targeted capacity building, training and awareness raising on child safeguarding. This includes socialising the expectations extended to partners with regards to implementation of child safeguarding behaviours.

KTF ensures the partner complies all required child protection standards, including KTF's Child Protection Policy and Child Protection Code of Conduct and, when using DFAT Australian Aid funds, DFAT's Child Protection Policy standards.

Partners must have:

- Their own KTF and DFAT compliant Child Protection Policy in place, or
- A plan to develop their own KTF and DFAT Child Protection Policy and sign on to the KTF Child Protection Policy and Child Protection Code of Conduct in the interim. Under this arrangement, KTF will ensure that any of the Partner's personnel working on the KTF project will have a current clean criminal background check for offenses against children, with evidence to be given to KTF

KTF works with partners to undertake a child protection risk assessment for all programs and activities working with children, that have contact with children, or impact on children and this is monitored throughout the life of the project cycle.

CORRESPONDENCE OR VISITS BETWEEN DONORS AND CHILDREN:

KTF recognises the need to implement specific guidelines to manage the child protection risks associated with any programs where correspondence or visits between donors or sponsors are facilitated (although this is mainly discouraged across the organisation's programming and fundraising). These guidelines include ensuring that:

- All correspondence, including letters and gifts, will be screened by KTF
- Favouritism must not be shown through the provision of gifts or inappropriate attention
- KTF will not disclose children's personal addresses or contact information
- A donor must not reveal their personal address or contact information to a child
- No money is to be sent directly from a donor to a child
- All sponsors/volunteers/donors will receive a child safeguarding briefing that includes clear child protection and behavioural guidelines
- Police / Working with Children checks are required for visiting sponsors/volunteers/donors and any accompanying family members
- All sponsors/visitors are expected to read and abide by KTF's Child Protection Policy and read, abide and sign the Child Protection Code of Conduct and Organisational Code of Conduct
- KTF or its partner agency staff will be present at all times during the visit/program
- Children should not be invited to leave or taken away from their communities
- Invitations to the sponsors/volunteers/donors' country are not permitted
- The exchange of mailing addresses and contact details (including online forums and social media platforms) is not permitted at any time
- All visits will be monitored
- Return visits to the child/community without the facilitation of KTF will be considered a breach of the Child Protection Policy or Child Protection Code of Conduct and follow up action will be taken by KTF, including reporting to authorities if deemed necessary.

TRAVEL OF CHILDREN

KTF does not permit visits of children outside of PNG.

If the travel of a child or young person within PNG is required, the travel is to be organised by KTF in accordance with the following principles:

1. The safety and wellbeing of the child/young person is at all times paramount;
2. KTF must obtain permission from the child/young person's parent or guardian before the young person travels

- outside of their home country;
3. KTF will be responsible for covering all travel relevant costs including airfares, passports and visas, travel insurance, accommodation, food, and entertainment;

In the majority of cases, children travelling associated with KTF's projects will be the children of KTF employees or other KTF personnel and will be travelling with their parents or guardians. KTF is still committed to prioritising the child's health, safety and wellbeing in these cases.

REPORTING AND PROCESSING OF ALLEGATIONS OF CHILD ABUSE

KTF considers harm to children, from acts of abuse, exploitation and neglect, to be completely unacceptable. We will take all concerns and reports of child abuse seriously and act on these reports immediately. KTF is committed to a reporting process which is truthful, fair and professional.

Reporting processes are summarised here; details are contained within KTF's Child Protection and PSEAH Allegation Management Procedures.

It is mandatory for all KTF personnel and representatives to report any witnessed, suspected or alleged incidents of child exploitation or abuse or any breach of the Child Protection Policy or Child Protection Code of Conduct.

Where any personnel, associate or representative develops concerns or witnesses an incident regarding child abuse, neglect or exploitation they must report such concerns to KTF's CEO, COO or Child Protection Officer (CPO) in Australia or the relevant position in KTF's partner organisation in PNG (see aligned Procedures for reporting tools and processes).

KTF's CEO can be contacted on: gen.nelson@ktf.ngo

KTF's COO can be contacted on: mike@ktf.ngo

KTF's CPO can be contacted on: sage@ktf.ngo or +61 418 811 748

KTF's Program Manager, PNG can be contacted on: lydia@kokodatrackfoundation.org

General KTF Phone: +61 418 811 748

KTF will follow its Child Protection & PSEAH Allegation Management Procedures for following up reports and addressing allegations of child- and young person-related offences. KTF will also report any instances or reports of breaches of this Policy and Child Protection Code of Conduct to DFAT (childwelfare@dfat.gov.au) and any Australian Government managing contractors as required.

RESPONSE TO ALLEGATION OF ABUSE

Reporting processes are summarised here; details are contained within KTF's Child Protection and PSEAH Allegation Management Procedures.

KTF will treat all concerns raised seriously and ensure that all parties will be treated fairly. KTF will investigate and respond to reports of child abuse in KTF programs in ways which are consistent with PNG law and DFAT's Child Protection Policy. All reports will be handled professionally, confidentially and expediently.

Details procedures are outlines in KTF's allied Document, but include (not limited to):

1. Receive the allegation in a timely manner
2. Document the allegation by completing KTF's [Child Protection Incident Reporting Tool](#) and in the case of DFAT funded projects, complete the DFAT Child Incident Notification Form ([accessible here](#))

3. Notify KTF's Child Protection Working Group and CEO (and board report in severe cases).
4. Undertake investigation including:
 - a. Notify the subject of the complaint and allow them the opportunity to state his or her perspective of the incident(s). An alleged perpetrator of child abuse will be suspended from their normal duties pending outcomes of the investigation
 - b. Gather and study background material and documentary evidence
 - c. Interview complainant
 - d. Interview victims if different from above
 - e. Interview witnesses if they exist
 - f. Write an investigation report
5. Report to local police and or child protection authority when it is suspected or becomes clear that a crime has been committed
6. Report to the Australian Federal Police when it is suspected or becomes clear that a crime has been committed regarding child sex tourism, child sex trafficking and child pornography
7. Report to local child protection services as necessary and if available
8. Handle the concern internally if it is not a criminal matter
9. Conclude investigation with recommendations
10. The findings of the investigation and recommendation will be reviewed for appropriate disciplinary action by the CEO and appropriate members of the board of directors
11. Advise all parties of relevant aspects of action to be taken
12. Deal with the investigation in a timely manner from its commencement and as considered appropriate by the Board of Directors and advice from relevant authorities

After appropriate investigation, any employee who has been found to have either been involved in the abuse of a child, or who was aware of such a situation but did not report it, will be subject to appropriate discipline, including possible termination of employment. Appropriate government authorities must be notified.

Confidentiality is a key principle of reporting and managing child protection concerns. All information regarding a child protection concern must only be shared with the designated Manager, CEO or Child Protection Working Group. All relevant KTF Employees (including the CEO, Child Protection Working Group members, Program Heads, and any other representative where agreed upon by the CEO) must sign and adhere to KTF's Child Protection Confidentiality Agreement. The names of people involved and the details of the report will remain confidential. Information will only be released on a "need to know" basis or when required by Australian or overseas law or when a report to police or child protection authorities is made.

KTF assures that no action will be taken against those who inform of incidents or risks in good faith. KTF's Whistleblower Policy outlines that all reports and information provided to KTF will be treated with respect and confidentiality and that KTF will take steps to ensure that the whistleblower can report without fear of retaliation. However, anyone who wilfully informs using false information or accusations may be subject to disciplinary action.

CHILD FRIENDLY DISCLOSURE & COMPLAINTS HANDLING POLICY

KTF has a child friendly complaints handling mechanism in place and children need to be aware that the mechanism exists and how to submit complaints. Formalities need to be reduced to the minimum absolutely necessary and children need to be able to submit a complaint directly to KTF personnel.

If a child discloses abuse, whatever the outcome, the child must be taken seriously. KTF personnel must remain calm and in control and 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 experiencing harm or at risk of experiencing harm, 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
- Telling the child/young person you are pleased he/she told you.

The above processes must then be followed for reporting the claim, completing an investigation and making reports to authorities where relevant. Information for the child is an essential element of a child-friendly complaint mechanism and the child must be kept informed of the process, the status of the complaint, and the outcome.

MEASURES FOR BREACH OF POLICY

The following measures can be applied for any personnel, associate or representative who breaches the Child Protection Policy and / or Code of Conduct:

- Meeting to discuss breach and opportunity for person to provide their account / understanding of the situation
- Performance management
- Further education on the Child Protection Policy and Code of Conduct
- Formal warning and monitoring
- Transfer to other duties
- Suspension pending investigation
- Internal investigation
- Report to Police
- Dismissal

These measures will apply alongside any criminal investigation where relevant.

MONITORING OF CHILD PROTECTION POLICY

KTF is committed to ensuring the currency of this policy. It is the responsibility of the CEO to ensure that the policy is reviewed annually and that it continues to support the ethical and safe work of KTF in PNG. Any change made to the Policy will be signed off by KTF's Board of Directors.

KTF employees will periodically assess all KTF documentation, policies and procedures against these standards and accordingly, recommend and implement changes if necessary.

END