

SAFEGUARDING CODE OF CONDUCT

Vision

All people thriving in a world without poverty.

Mission

We identify high-potential initiatives and work with partners and funders to transform them into sustainable products. When communities, governments, or markets adopt and scale these products, more people experience lasting improvements in wellbeing, resilience, and opportunity.

Values

The Safeguarding Code of Conduct aligns with AOP's organisational values:

- Integrity:** we are open, transparent and accountable to build trust with all
- Pursuit of excellence:** we hold ourselves to the highest standards in all we do
- Respect:** we include, value and respect the people we work with and interact with
- Innovation:** we have the courage to explore new ideas and identify ways to be more effective
- Collaboration:** we value working with others to optimize our impact

Introduction

Action on Poverty (AOP) is an independent, secular, not for profit, non-governmental organisation (NGO). Founded in Australia in 1968, AOP was incorporated in the state of New South Wales in 1983. AOP works with partners and communities in Africa, Asia and the Pacific.

AOP is committed to supporting work that is of the highest standard, and in doing so, holds full accreditation with the Australian Government through the Department of Foreign Affairs and Trade (DFAT). AOP is a signatory to the Australian Council for International Development (ACFID) Code of Conduct which requires high standards of corporate governance, public accountability and financial management to be in place.

Safeguarding Code of Conduct Purpose

At Action on Poverty upholding the dignity and human rights of every individual is central to our values and development work. Every person who represents AOP is expected to reflect these values in their professional conduct wherever and with whomever they work. This is particularly important when engaging with marginalised communities and with children and vulnerable adults.

AOP defines safeguarding as its responsibility to ensure its staff and related personnel, programs and operations do not harm children or adults and do not expose children or adults to the risk of harm and abuse. Safeguarding includes protecting children from all forms of child abuse or exploitation as well as preventing sexual exploitation, abuse or harassment (PSEAH). Safeguarding includes all the actions taken to protect and prevent as well as the steps taken to respond if harm occurs.

AOP recognise that the nature of its work places its personnel in positions of trust and authority in relation to the communities and individuals they work with. AOP personnel must never abuse this trust to exploit or abuse another person and are obligated to uphold the highest standards of personal and professional conduct at all times.

This Safeguarding Code of Conduct was developed to set and enforce standards of expected and prohibited safeguarding conduct across the organisation. Whilst acknowledging that local laws and customs may differ from one country to another, the AOP Safeguarding Code of Conduct is based on international safeguarding standards and industry practice.

Scope

AOP's capacity to ensure the protection of all people that it works with depends on the commitment and ability of its personnel to uphold and promote the highest standards of ethical and professional conduct. As such, this Code of Conduct applies:

- 1.1 To all AOP activities.
- 1.2 To all personnel, including board members, full time and part time staff, international and national staff, volunteers, and contractors and consultants.
- 1.3 To all associated personnel, including visitors, work experience students or interns, family members that accompany AOP personnel on international (away from their usual workplace) assignment.
- 1.4 At all times when personnel and associated personnel can be considered to represent the organization, whether during working hours or not.

Safeguarding is a shared responsibility for all personnel and associated personnel. Compliance with this Code is mandatory.

This Code also cascades and applies to AOP partner personnel and is built into AOP agreements with partners.

All AOP personnel and associated personnel must sign and abide by the Code of Conduct. Non-compliance results in disciplinary action up to and including termination of engagement with AOP and criminal proceedings.

Associated Policies and Procedures.

This Code of Conduct is accompanied by the:

The AOP **Values, Ethics and Corporate Conduct Policy**,

Safeguarding Policy, which outlines AOP Policy settings for implementing safeguarding across its operations and programs. The Policy should be read alongside the Code of Conduct.

Safeguarding Policy Implementation Guideline. The guideline outlines detailed requirements and processes and provides tools and guidance to assist AOP personnel to operationalise the Safeguarding Policy across all areas of the organisation's work. The Guideline also includes a section that defines all the key terms used in the Code of Conduct.

Expected Conduct

All personnel must always:

- Read and act in accordance with the associated policies and procedures, including the Safeguarding Policy and Safeguarding Policy Implementation Guidelines.
- Uphold the integrity of AOP by ensuring that my professional and personal conduct is, and is seen to be, of the highest standard and consistent with Action on Poverty's values and the Values, Ethics and Corporate Conduct Policy.
- Act with integrity and professionalism, abide by the relevant Australian and local law in all areas of work - including labour laws in relation to child labour, and avoid or declare conflicts of interest.
- Promote and model the highest levels of professional conduct with program participants, partners and colleagues. Trust forms the basis of successful development work and must be protected.
- Take steps, within the scope of their role, to prevent child abuse.
- Take steps, within the scope of their role, to prevent sexual exploitation, abuse or harassment of any person.
- Promote and advocate for adherence to the Code of Conduct, including with partners and associated personnel.
- Talk to children and vulnerable adults about their contact with personnel and associated personnel and encourage them to raise any concerns.
- Make children aware of their rights, what is acceptable and unacceptable, and what they can do if there is a problem.
- Treat children and adults with respect regardless of race, nationality, ethnicity, language, religion, indigeneity, ability, age, displacement, caste, gender, gender identity, sexuality, sexual orientation, poverty, class, socio-economic status, or any other status.

- Endeavour to provide an inclusive, welcoming and safe environment for all children, young people, and vulnerable adults.
- Contribute to a culture of openness to enable any issues or concerns to be discussed.
- Foster a sense of accountability among personnel and associated personnel so that unacceptable practices or potentially exploitative or abusive behaviours do not go unchallenged.
- Avoid circumstances where my behaviours may be perceived as hostile, neglectful, exploitative, abusive or inappropriate to children or vulnerable adults.
- Make myself aware of situations which may present risks and manage them accordingly.
- Plan and organise the work and the workplace so as to minimise risks to children and vulnerable adults.
- Ensure that another adult is present when working within the proximity of children.
- Immediately disclose all charges, convictions and other outcomes of an offence that relates to exploitation and abuse of a child or vulnerable adult, including those under traditional law, which occurred before, or during my association with Action on Poverty.
- Immediately report any concerns, allegations or disclosures related to child abuse or sexual exploitation, abuse or harassment in line with the Safeguarding Policy and Guidelines.
- Undertake safeguarding risk assessments appropriate to my role, and in line with the Safeguarding Policy and Guidelines.
- Use computers, mobile phones, video cameras, cameras or social media appropriately and in accordance with IT and Social Media Policy.
- Safeguard and use AOP information and resources in a responsible manner that will not place children or vulnerable adults at risk of harm.
- Inform my manager or Safeguarding Focal Point if I become engaged in a personal relationship which may be perceived as inappropriate or exploitative. This includes any relationship with people that accesses or benefits from AOP Programs or Supports.
- Participate in safeguarding, child safeguarding or PSEAH training, supervision and performance processes, as required for my role.

When photographing, filming or otherwise recording a child or using children’s images or voices, I will:

- Assess and endeavour to comply with local traditions or restrictions for obtaining and reproducing personal images before photographing or filming a child.
- Obtain informed consent from the child and parent or guardian of the child before photographing or filming a child.
- Explain the possible uses of the photograph or film by AOP
- Ensure photographs, films, videos and other recordings present children in a dignified and respectful manner and not in a vulnerable or submissive manner.
- Ensure children are adequately and appropriately 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, tags, data or text descriptions do not reveal identifying information about a child when sending images electronically, publishing images in any form, or in discussions.
- Share a copy of the communication product with the child, if possible.

Prohibited Conduct:

AOP believes that all children have the right to be safe and feel safe. AOP does not tolerate any form of child exploitation, child abuse (including physical abuse, sexual abuse, emotional abuse, neglect and grooming), child labour or child sex tourism.

All personnel must never:

- Engage in any form of sexual intercourse or sexual activity with a child (a person under the age of 18). Sexual activity with children is strictly prohibited regardless of the local age of majority or age of consent. Mistaken belief about the age of a child is not a defense.

- Hit or physically assault children.
- Use physical, corporal, or other degrading punishment against children.
- Act in ways that may be abusive or may place a child at risk.
- Hire 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 risk of injury.
- Develop relationships with children, which could in any way be deemed exploitative, abusive, or “grooming behaviour.
- Make or accept social media or online friend/connect/direct message requests with children who access or benefit from AOP Programs.
- Hold, kiss, cuddle or touch a child in an inappropriate, unnecessary, or culturally insensitive way.
- Provide drugs or alcohol to a child.
- Behave physically in a manner which is inappropriate or sexually provocative.
- Use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Take or invite unaccompanied children into the home unless they are at immediate risk of injury or physical danger. In which case I must inform and receive approval from my supervisor as soon as possible.
- Sleep in the same room with a child, unless absolutely necessary in which case I must inform and receive approval from my supervisor first.
- Do things for children of a personal nature that they can do for themselves.
- Condone, or participate in behaviour with children which is illegal, unsafe or abusive.
- Act in ways intended to shame, humiliate, degrade children, or otherwise, perpetrate any form of emotional abuse.
- Discriminate against, show differential treatment, or favour particular children to the exclusion of others.
- Release or discuss any personal and confidential information about suspected or proven child abuse cases, other than with the designated Child Protection Focal Point/s according to the AOP Child Protection Policy Guidelines.
- Work or spend time alone with a child.

**AOP believes that sexual exploitation, abuse or harassment are unacceptable.
Any form of SEAH will not be tolerated.**

All personnel must never:

- Engage in sexual relationships with program participants or beneficiaries. These relationships are inherently based on unequal power dynamics. Such relationships undermine the credibility and integrity of AOP’s programs.
- Exchange money, employment, goods or services for sex, including sexual favours while working or volunteering with AOP. This includes the exchange of assistance that is due to program participants. This also includes a prohibition on engaging the services of sex workers even when it is legal to do so and further prohibits the procurement of sex for others or the use of a third party to do so.
- Use any form of humiliating, degrading or exploitative behaviour.
- Use AOP or partner organization facilities, vehicles, personnel, or resources for the purpose of arranging or facilitating access to sex workers by any person, including visitors to AOP or partner offices or programs
- Use computers, mobile phones, video cameras, cameras or other technology inappropriately, or to exploit or harass, or access and disseminate exploitative material, including child sexual abuse or exploitation material, through any medium including social media.
- Fraternise¹, when working on, deployed or engaged in the delivery of an activity that is assessed as very high risk for sexual exploitation, abuse or harassment.

¹ Fraternisation refers to any relationship occurring in the course of conducting business, that involves — or appears to involve — partiality, preferential treatment or improper use of rank or position including but not limited to voluntary sexual behaviour. Refer to the Safeguarding Policy for further information.

ACKNOWLEDGMENT

- I, _____, acknowledge that I have received, read and understood AOP's Safeguarding Code of Conduct, Safeguarding Policy, Safeguarding Policy Implementation Guidelines, and Values, Ethics and Corporate Conduct Policy.
- I am committed to upholding the standards and behaviours described in the AOP Safeguarding Code of Conduct.
- I fully appreciate that this is not an exhaustive or exclusive list.
- I understand that this Code of Conduct will be reviewed at least every 3 years, alongside the Safeguarding Policy and following any significant breach and that I will be required to renew my acknowledgement and commitment to the Code accordingly.
- I understand that failure to comply with the standards detailed in this Code of Conduct and the associated policies may be grounds for disciplinary measures, legal action, suspension from duties, and/or dismissal.

SIGNED BY:	WITNESSED BY:
_____ (SIGNATURE)	_____ (SIGNATURE)
_____ (PRINT NAME)	_____ (PRINT NAME)
_____ (DATE)	_____ (DATE)

Safeguarding Code of Conduct Approved: February 2020.

Reviewed: May 2021, April 2025.

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