

SAFEGUARDING POLICY

1. 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.

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

We are passionate about serving others and seek to enhance wellbeing, purpose and meaning for everyone we work with. Our work is underpinned by the following core values that guide the ways we achieve and measure success:

- **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 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

2. Safeguarding Policy 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 respond if harm occurs.

This Safeguarding Policy was developed to

- Guide and educate AOP personnel and partners about what is expected of them.
- Promote a culture and environment where everyone is committed to safeguarding the communities and individuals we work with.
- Prevent abuse or exploitation of children within AOP or its programs.
- Prevent sexual exploitation, abuse or harassment within AOP or its programs.
- Respond immediately and appropriately if child abuse, harm or exploitation, or if sexual exploitation, sexual abuse or sexual harassment occurs.
- Meet legislative and regulatory requirements for child protection and child safeguarding, and to meet the minimum standards of the Australian Government Department of Foreign Affairs and Trade Child Protection and PSEAH Policies.

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.

3. Scope

- 3.1 This policy applies to all AOP activities.
- 3.2 This policy applies to all personnel, including board members, staff, consultants, as well as visitors and volunteers. Safeguarding is a shared responsibility for all personnel and compliance with this Policy is mandatory.
- 3.3 This policy applies at all times when personnel can be considered to represent the organization, whether during working hours or not.
- 3.4 This policy cascades and applies to AOP partners and contractors and is built into AOP agreements with partners and contractors. These are known as associated personnel.
- 3.5 Family members that accompany AOP personnel on international (away from their usual workplace) assignment must also follow this Policy while accompanying.

4. Associated Policies and Procedures.

This policy is accompanied by the:

- [Safeguarding Code of Conduct](#). AOP is committed to setting and enforcing standards of safeguarding conduct across the organisation. Upholding human rights and dignity is central to AOPs values and work, and all AOP Personnel are to reflect these values in their conduct as representatives of AOP.

AOP recognise that the nature of AOPs 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. The Safeguarding Code of Conduct outlines expected conduct and prohibited conduct.

AOP requires all personnel to comply with the Safeguarding Code of Conduct. Non-compliance results in disciplinary action up to and including termination of engagement with AOP and criminal proceedings.

- [Safeguarding Policy Implementation Guideline](#). The guideline outlines detailed requirements and processes and provides tools and guidance to assist AOP personnel to operationalise this Policy across all areas of the organisation's operations.
- This Policy is also implemented through [AOP Policies](#) available on the AOP Website.
 - Complaints Handling Policy
 - Conflict of Interest Policy
 - Procurement Policy
 - Risk Management Policy
 - Staff Code of Conduct
 - Safe Workplace Policy
 - Staff Recruitment Policy
 - Values Ethics & Corporate Conduct Policy
 - Welfare Evangelism & Partisan Politics Policy
 - Whistleblowing Policy

5. Policy Principles

Sexual exploitation, abuse and harassment (SEAH) and all forms of Child Abuse are violations of human dignity and rights. AOP is committed to implementing strategies to create safe environments and to setting and enforcing standards of conduct and processes that identify and manage safeguarding risks across the organisation including its programs and partnerships.

AOP applies the following principles across the implementation of this Policy.

- 5.1** AOP believes that any form of child abuse or exploitation, including child labour, child sex tourism, and grooming are unacceptable. AOP has **zero tolerance toward all forms of child abuse**.
- 5.2** AOP believes that sexual exploitation, abuse or harassment are unacceptable. AOP has **zero tolerance toward SEAH**.
- 5.3** AOP Leaders will set clear expectations and will **model and champion** safeguarding behaviours and processes. AOP believes in transparency and leaders will encourage scrutiny of their own behaviour and that of other AOP senior managers.
- 5.4** AOP believes all children and adults should have the right to be **equally protected and assisted** regardless of their gender, nationality, religious or political beliefs, family background, economic status, physical or mental health or criminal background. In particular, AOP recognizes that effective safeguarding requires us to address gender inequality, power imbalances and other personal characteristics that can increase risks of safeguarding abuse.
- 5.5** AOP will prioritise the **prevention of harm** to children and the sexual exploitation, abuse or harassment of all people. This is achieved by taking a risk-based approach across the organisation to identify and assess risks, document existing controls, and put in place additional treatments where required to reduce or remove safeguarding risks.
- 5.6** AOP believes children in our programs have the **right to express their views on matters affecting them**. AOP takes proactive steps to create child safe and child friendly programs. AOP implements a rights-based approach in our programs and ensures that all activities integrate the key principles of the United Nations Convention on the Rights of the Child¹, including additional optional protocols as well as relevant International Labour Organisation Conventions.
- 5.7** AOP believes that effective safeguarding requires AOP to act on every concern, complaint or incident raised. **Not taking action is unacceptable and will not be tolerated**. AOP Personnel must immediately report concerns or any reasonable belief regarding sexual exploitation and abuse, and child abuse by a fellow worker, whether in AOP or not.
- 5.8** AOP believes that all **children have a right to be safe at all times** and that everyone at AOP has an obligation to provide safe and protective programs and environments that prevent violence, abuse, neglect or exploitation of children. The **best interests of the child** will be the guiding principle in the implementation of the Safeguarding Policy.
- 5.9** AOP believes in the principle of **procedural fairness** when investigating complaints, concerns and allegations.
- 5.10** While ensuring procedural fairness, AOP will **prioritise the rights, needs and wishes of the victim/survivor** when investigating safeguarding complaints.

¹ UN Convention on the Rights of the Child, 1989 – accessed at <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>

6. Policy Settings

6.1 Safeguarding Leadership and Culture

AOP is committed to creating a healthy, safe and trusted safeguarding culture that is representative of our values.

The AOP Board is responsible for ensuring safeguarding is a strategic focus, adequately resourced and continually improved. The Board will be champions for safeguarding and has responsibility to provide organisational oversight of the implementation of policy and to promote safeguarding culture to ensure AOP's accountability for this issue.

The CEO has ultimate responsibility to ensure adherence with this Policy, including that safeguarding is adequately incorporated into annual plans and budgets.

Senior Management (executives) are responsible for leading, championing and promoting the implementation of this Policy, the Safeguarding Code of Conduct and associated guidelines. This includes that ensuring adequate resourcing to operationalise this Policy.

Program Managers are responsible assessing and mitigating safeguarding risks in all programs and partnerships.

Human Resource Management are responsible for ensuring recruitment, screening and training policy settings are fully implemented and for managing and maintaining robust and accountable reporting and case management systems for safeguarding complaints or allegations made against personnel and partner staff engaged in its activities.

Safeguarding Focal Points are appointed to monitor and support the implementation, enforcement, compliance, and monitoring of the AOP Safeguarding Policy, Code of Conduct and Implementation Guidelines.

AOP Management, at all levels will role model and enforce a safeguarding culture that supports all personnel to meet these safeguarding expectations. While management has a set of specific responsibilities, **everyone at AOP is responsible for:**

- Actively implement and adhere to the Safeguarding Policy.
- Create and maintain an environment and culture that prevents sexual exploitation and abuse and all forms of child abuse and promotes the implementation of this policy.
- Demonstrate the highest professional and ethical standards in their day-to-day conduct.
- Adhere to and actively implement the Safeguarding Code of Conduct. Compliance with the Code is compulsory.
- Ensure the safety and wellbeing of children and young people.
- Identify and raise any safeguarding risks relevant to their roles or programs. This includes any risks to children's safety, risks of child abuse, or risks of sexual exploitation, abuse or harassment.
- Ensure that all training requirements are complied with as outlined in the Safeguarding Policy and related guidelines.
- Immediately report all concerns, suspicions, and incidents in accordance with reporting requirements as outlined in the Safeguarding Policy and related guidelines. This includes raising concerns about misconduct or concerning behaviours of adults that may present a risk to the safety and well-being of children, young people or vulnerable adults.

The AOP Safeguarding Implementation Guideline provides additional information about specific safeguarding responsibilities.

6.2 Safeguarding Risk Management

AOP prioritise the **prevention of abuse or exploitation of** children and the sexual exploitation, abuse or harassment of all people and is **committed to proactively managing safeguarding risks**

across its operations.

Identifying and managing risk is an integral part of AOP's approach to decision-making and accountability. Whilst it is never possible to eliminate all risks, the aim of safeguarding risk management is to identify and minimize specific risks to children and vulnerable adults' safety and wellbeing as a result of AOP People, Programs or Partners.

This is achieved by:

- Ensuring safeguarding is managed in accordance with the AOP Risk Management Policy, including identifying and assessing safeguarding risks, documenting existing controls, and putting in place additional treatments where required to reduce or remove safeguarding risks.
- Identifying and managing safeguarding risks associated with our people (see 6.3), partners (see 6.4), and programs (see 6.5).
- Identifying and managing safeguarding risks in communications and fundraising. This includes by ensuring:
 - AOP **Brand Guidelines** outline expectations for communications and photography, including expectations for safeguarding children and vulnerable adults.
 - Providing an **Ethical Decision-Making Framework** for Public Communication that outlines detailed step by step processes, including **for informed consent**, that ensuring images and stories are safeguarded.
 - Enforcing expectations around images, photography, stories and consent through the Safeguarding Code of Conduct.

6.3 Safeguarding in Recruitment

AOP is committed to prevent, in compliance with applicable laws, anyone from working with children or vulnerable adults if they pose an unacceptable safeguarding risk. AOP has embedded safeguarding into its robust recruitment processes outlined in the AOP Staff Recruitment Policy. It includes the following:

- All roles are assessed for their levels of safeguarding risk and **categorized** accordingly. Roles assessed as high risk – such as those working directly with children or vulnerable adults require the highest level of screening.
- Safeguarding inclusions in all job/role **advertisements, position descriptions, interviews, reference checking, screening, and contracting.**
- All personnel are screened before engagement with AOP. Screening includes criminal history checks (for all), working with children checks (for Australian based staff) safeguarding declarations, and reference checks.
- Roles that work with children or vulnerable adults have additional behavioral based questions included in their interviews and reference checks to test their suitability.
- All AOP Personnel must sign and abide by the Safeguarding Policy and Code of Conduct as part of their **contract terms and conditions**. All candidates receive the Safeguarding Policy and Code of Conduct as a condition of contracting.

Detailed processes are outlined in the AOP Safeguarding Guidelines, the AOP Staff Manual of Procedures and the Human Resources Manual (Vietnam).

6.4 Safeguarding in Partnerships

Most of AOP's work is carried out in collaboration with partners, therefore it is vital to ensure partners commit to the same safeguarding standards. **AOP is committed to ensuring that AOP partners**

incorporate this Policy into their own policies and practices and abide by them

To this end:

- AOP requires all partners to read, acknowledge, and sign the AOP Safeguarding Policy and AOP Safeguarding Code of Conduct. **Partnership agreements** commit Partner organisations to meet the same safeguarding standards as AOP and include conditions that AOP may terminate partnership agreements for breaching the AOP Safeguarding Policy or Code of Conduct.
- AOP has **policy and organisational assessments** that enable AOP and its partners to understand and meet required standards.
- AOP **inducts partners** into AOP's safeguarding policy expectations. AOP also makes other **safeguarding training** available for all partners or supports them in the delivery of their own training for their personnel (AOP Associated Personnel).
- AOP requires partners to ensure **Safeguarding information is publicly available** for program participants, including information about how to raise a safeguarding complaint or concern.
- AOP requires that all partners, from the day of signing the Contract, Safeguarding Policy and Code of Conduct, **without exception, report any suspected Safeguarding incidents** to AOP within 24 hours, in addition to responding to the incident. Failure to do so will result in suspension and potentially termination of any Project Agreement.

6.5 Safeguarding Programs

AOP is committed to identifying and managing safeguarding risks for all programs and activities.

To meet this commitment:

- AOP completes **Risk Assessments** when assessing a new program. Assessments ensure that safeguarding risks are identified, assessed and that mitigation strategies are put in place and monitored through AOP's program management process.
- Programs that involve work with children or vulnerable adults are considered higher risk and require more stringent and regular risk assessments and oversight, which are integrated in project development, budgeting, implementation, monitoring and evaluation. In addition, AOP requires that a higher risk program appoint a Safeguarding Focal Point.

6.6 Safeguarding Awareness, Support and Training

AOP is committed to Informing, supporting and training personnel and partners about this Policy and their roles and responsibilities for implementing strategies to prevent and respond to safeguarding abuses.

The following steps to ensure awareness, support and training are provided:

Awareness

- All personnel and associated personnel have **access** to the Safeguarding Policy and Code of Conduct, in both English and Vietnamese, through the AOP Internet and Intranet. They are also available at every AOP (program) office.
- **Inducting all personnel** into the Safeguarding Policy and Code of Conduct within 3 months of commencing their role. Induction training includes information about safeguarding roles, responsibilities and obligations under this Policy, identifying and responding to safeguarding concerns, and the complaints handling process.
- Ensuring that all AOP Personnel are aware of the problem of child abuse and the risks to children, and are aware of the problem of sexual exploitation, abuse, and harassment in the international development sector and the steps being taken to end it.

Support

- AOP have developed the **Safeguarding Policy Implementation Guideline** to provide detailed support to implement safeguarding policy settings.
- At least two **Safeguarding Focal Points** are appointed to support the implementation of the Safeguarding Policy and to be the first point of contact to receive reports on safeguarding incidents. AOP ensures that AOP Personnel and partners know who the Focal Points are and how to contact them
- **Supervision and performance appraisal** processes include a focus on the Safeguarding Policy, Code of Conduct and related Guidelines, as well as a commitment to performance management.

Training

- All AOP personnel receive **safeguarding training every 3 years**. Training includes roles, responsibilities and obligations under this Policy, safeguarding in risk management and partnerships, identifying and responding to safeguarding concerns, and the complaints handling process.
- Additional training is provided by AOP as required, to ensure commitments are met, risks are managed or in response to recommendations from safeguarding reviews or investigations.
- Safeguarding Focal Points **complete additional training** to support them in their function.
- AOP maintains full and **accurate records about training** and support

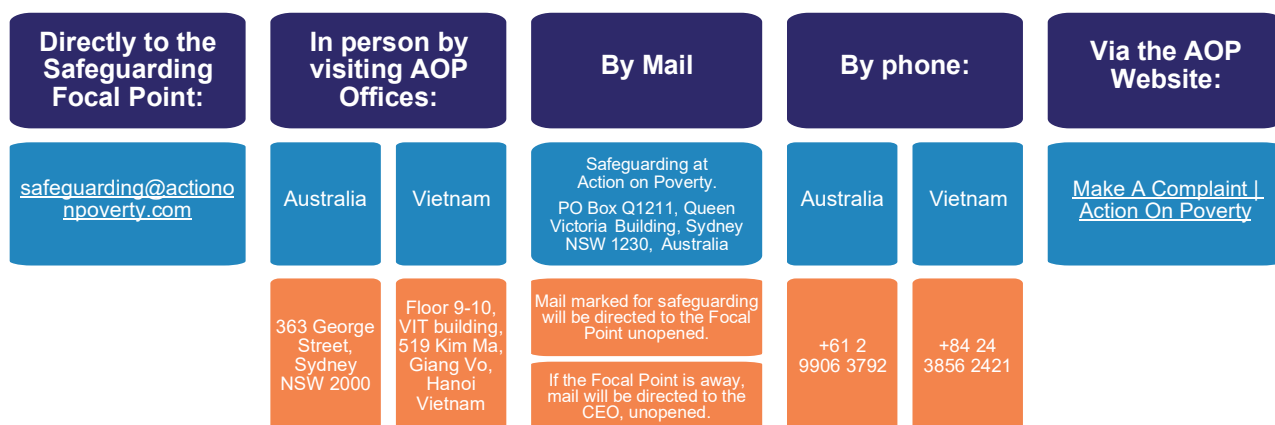
6.7 Complaints Management

AOP is committed to implementing safe, accessible and trusted complaints management processes where all safeguarding incidents concerns or complaints are taken seriously, managed and investigated sensitively and effectively, and reported appropriately.

To meet this commitment AOP:

- Encourages safeguarding complaints Including complaints, concerns, incidents or a **reasonable belief** about:
 - breaches of the Safeguarding Policy
 - breaches of the Safeguarding Code of Conduct
 - harm to children as a result of the presence or activities of AOP. Harm includes all forms of child abuse, child exploitation and child labour. A complaint should also be raised if there are concerns that a could be harmed.
 - sexual exploitation, abuse or harassment of people involved in AOP programs or partnerships.
- Makes information and communication materials **publicly available** to all through the website and visible at every AOP (program) office. [See Annex 2 for a summary flow chart.](#)
- Makes it **mandatory for all AOP Personnel to report** any reasonable belief about a safeguarding breach, without exception, within 24 hours of becoming aware. Reports must be submitted to the Safeguarding Focal Point using the **Safeguarding Reporting Form**.
- Implements a **Whistle Blower** Policy and Procedure for AOP Personnel to make a protected complaint.
- Ensure anyone raising a complaint or making a report in good faith will be protected. There are no negative consequences for people that raise a complaint in good faith that is later unsubstantiated.

- Ensures multiple **pathways**, in addition to the Whistleblowing Pathway, are available to raise a complaint, including:



Regardless of pathways, all complaints are immediately (same day) forwarded to the Safeguarding Focal Point safeguarding@actiononpoverty.org

If someone is at immediate risk or in danger, do not delay – call emergency services. In Australia Triple Zero (000). In Vietnam One One Three (113).

- Makes this Policy and information about complaints, including the Whistleblower Policy, available in both **English and Vietnamese**.
- Includes information about this Policy and the Complaints Process into **Partner Agreements and Induction**. AOP also share communications materials with Partners to support them to develop their own.
- Works with partners to ensure **accessible pathways for communities** and service users. This includes providing information about pathways in appropriate language and format. Where the partner delivers programs for children or young people, this will include providing information in **child-friendly formats**.
- **Protects from retaliation** to the best of AOPs ability, a person making a safeguarding complaint.
- **Takes every complaint seriously** and manages it in accordance with the Safeguarding Policy Implementation Guidelines. All complaints are acknowledged and assessed to plan for the next steps. The assessment outcome is documented, approved and communicated.

If the complainant is not satisfied, they can escalate the complaint to the Chair of the AOP Board. chairperson@actiononpoverty.com They can take this escalation without any negative repercussions.

- **Adopts a Survivor-Centred Approach** that prioritizes the victim/survivor's experiences, considerations, and needs throughout the complaints management process.
- **Shares information about the complaint and makes external reports appropriately.** Information is shared on a strictly need-to-know basis, only when it is safe to do so and in line with adult survivors' wishes².

AOP will **report suspected criminal activity promptly** to relevant authorities for appropriate action, both in the country where the abuse occurred, and in the abuser's country of origin. AOP will provide full assistance to the authorities with their investigation. If the complaint relates to abuse or safety risks for a child within their family, the complaint will be reported to the relevant **child protection authority**.

Under AOP contracts with the Australian Department of Foreign Affairs and Trade, AOP must

² There are some exceptions to this, including when AOP has serious concerns about people's safety, when it is agreed that a report is required for the best interest of the child, or when we are contractually or legally mandated to make reports.

immediately notify DFAT about any child protection or PSEAH concerns that occur in the course of delivering DFAT business.

- **Investigate all safeguarding complaints**, concerns or incidents about AOP personnel or programs and ensuring that our partners do the same. Investigations are undertaken according to the Safeguarding Guidelines and which include processes to assure procedural fairness.

If the subject of the complaint is an AOP Personnel, they will be suspended or placed on leave during the investigation.

6.8 Disciplinary Action

Breaching or failing to comply with this Policy may result in disciplinary action up to and including dismissal, depending on the severity of the breach.

Substantiated complaints about sexual exploitation, abuse or harassment and all forms of child abuse or exploitation are considered gross misconduct and are grounds for summary dismissal of employment or termination of contract/agreement and referral to local law enforcement authorities in the case of criminal action.

Substantiated breaches of the Safeguarding Policy or Code of Conduct that are not found to include child abuse or exploitation, sexual exploitation, abuse or harassment may result in disciplinary action, including and up to suspension or dismissal.

Other disciplinary measures may include:

- Formal warning and ongoing monitoring.
- Increased supervision.
- Requirement for additional safeguarding training or education.
- Transfer to other duties.

Complaints that are not substantiated or proven to be untrue may still result in remedial action being taken, such as increased supervision or additional training because the complaint may highlight measures required to strengthen safeguarding.

Disciplinary and remedial action is shared with the subject of the complaint, and in most cases the survivor.

6.9 Monitoring and evaluation for continually improvement

AOP is committed to continually improving the effectiveness of our safeguarding strategies.

This is achieved by:

- Analysing information on concerns, complaints, allegations, incidents, and investigations in order to monitor effectiveness of prevention and response strategies.
- Requiring all investigations to make recommendations about how to strengthen future safeguarding, including recommendations for improving the complaints management process.
- Reporting on safeguarding performance following partner or program monitoring visits.
- Including safeguarding as a required topic in program and partnership reports.
- Assessing performance against safeguarding policy in relevant reviews and end of program evaluations.
- Including a question about safeguarding culture into the annual AOP workplace culture.
- Maintaining a Safeguarding Improvement Plan through the Safeguarding Worktracker.
- Reporting quarterly to the Board about implementation of this Policy and the Safeguarding Code of Conduct.

7. Monitoring Safeguarding Policy Review

AOP is committed to continually improve the effectiveness of this Policy and the Safeguarding Code of Conduct. The policy will be reviewed following incidents and near misses and/or at least every 3 years to ensure that it remains relevant to the needs of AOP and its partners.

8. Acknowledgement

I acknowledge that I have received, read and understood AOP's Safeguarding Policy. I understand that disciplinary measures, legal action and/or suspension from duties may be undertaken in case of breach of the Safeguarding Policy and its associated Policy and procedures.

<p>SIGNED BY:</p> <p>_____</p> <p>(SIGNATURE)</p> <p>_____</p> <p>(PRINT NAME)</p> <p>_____</p> <p>(DATE)</p>	<p>WITNESSED BY:</p> <p>_____</p> <p>(SIGNATURE)</p> <p>_____</p> <p>(PRINT NAME)</p> <p>_____</p> <p>(DATE)</p>
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*This Policy has merged the following Policies:
Child Protection Policy (April 2021 version) and PSEAH Policy (April 2021) version.*

*Safeguarding Policy Version 1: Approved: March 2025.
Next Revision Date: March 2028*

Annex 1: Policy Definitions

AOP Personnel:	Personnel include board members, staff, consultants, as well as visitors, volunteers and interns.
AOP Associated Personnel	This includes personnel of non-AOP entities who have entered into partnerships, sub-grant or sub-recipient agreements with AOP.
Best interest of the child	<p>Support to child survivor/victims must be provided in a manner consistent with the UN Convention on the Rights of the Child (UNCRC), in particular the principle of the “best interests of the child”, as per article 3 of the CRC.</p> <p>Children have the right to have their best interests assessed and considered as a primary consideration in all actions or decisions that concern them. In addition, children shall be assured of the right to express their views freely in all matters affecting them, their views being given due weight in accordance with the child’s age and level of maturity, as per article 12 of the CRC. For children who are too young to understand information about their rights and service options, this information should also be shared with their trusted adult who can support the child to participate in making a decision.</p>
Child	In accordance with the United Nations Convention on the Rights of the Child (UNCRC) and for the purpose of this Policy (as well as the Safeguarding Guidelines and Safeguarding Code of Conduct), AOP defines a child as ‘any person under the age of 18 years, regardless of whether a country’s laws recognise adulthood earlier.’
Child Abuse	<p>Abuse happens to male and female children of all ages, ethnicity and social backgrounds, abilities, sexual orientation, religious beliefs and political persuasion.</p> <p>Child Abuse includes physical, sexual, emotional, neglect, child labour and family violence. In some cases, professionals and other adults working with children in a position of trust also abuse children.</p> <ul style="list-style-type: none"> • Physical abuse: the use of physical force against a child that results in harm to the child. Physically abusive behaviour includes shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning. • Neglect: the failure by a parent or caregiver to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being. • Emotional abuse: refers to a parent or caregiver’s inappropriate verbal or symbolic acts toward a child or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child’s self-esteem or social competence. • Sexual abuse: the use of a child for sexual gratification by an adult or significantly older child or adolescent. Sexually abusive behaviours can include fondling genitals, masturbation, and oral sex, vaginal or anal penetration by a penis, finger or any other object, fondling breasts, voyeurism, and exhibitionism and exposing the child to, or involving the child in, pornography. (Australian Government/AusAID Child Protection Policy, January 2013). • Grooming Behaviour: behavior that makes it easier for an offender to procure a child for sexual activity. For example, an offender may build a relationship of trust or intimacy with the child and then seek to sexualize that relationship. Examples include favouring a child, isolating a child, giving excessive attention or gifts, using sexualised language or physical contact, exposing a child to sexual concepts, or providing a child with drugs or alcohol.
Child Abuse &	Material that depicts (expressly or implicitly) a child under 18 years of age as a victim of

Exploitation Material	torture, cruelty or physical abuse; or which may be classified as child pornography material.
Child Exploitation	Child Exploitation refers to the use of children for someone else’s advantage, gratification or profit often resulting in unjust, cruel and harmful treatment of the child. These activities are to the detriment of the child’s physical or mental health, education, moral or social-emotional development.
Child Labour	Work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Whether or not particular forms of “work” can be called “child labour” depends on the child’s age, the type and hours of work performed, the conditions under which it is performed and the objectives pursued by individual countries. The answer varies from country to country, as well as among sectors within countries. (Source: International Labor Organisation). It refers to work that is mentally, physically, socially or morally dangerous and harmful to children; and interferes with their schooling by depriving them of the opportunity to attend school by obliging children to leave school early.
Child Safeguarding	An organisation’s responsibility to make sure its staff and related personnel, programs and operations do no harm to children. It includes all the actions taken to protect and prevent as well as the steps taken respond if harm occurs.
Child Sexual Abuse Material Also referred to as Child Pornography or Child Pornography Material.	<p>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.’</p> <p>For further information regarding child pornography offences, refer to the Australian Criminal Code Act 1995.</p> <p>Child Sexual Abuse Material is material that depicts a person, or is a representation of a person, who is, or appears to be, under 18 years of age and is engaged in, or appears to be engaged in, a sexual pose or sexual activity, or is in the presence of a person who is engaged in, or appears to be engaged in, a sexual pose or activity, and does this in a way that a reasonable person would regard as being, in all the circumstances, offensive.</p> <p>AOP has included the definition of child pornography and child pornography material as a reference only, recognizing that the term continues to be used in legislation. AOP uses the term Child Sexual Abuse Material.</p>
Criminal Record Check	<p>A check of an individual’s criminal history record. In Australia, national criminal record checks are available through state and territory police departments. They take around 20 working days. The type of employment should be specified as ‘overseas employment.’</p> <p>Overseas, different checking procedures apply in each country and may take six weeks or longer. Individuals need to consent to a criminal record check and should be informed of the purpose for which the resulting police clearance certificate will be used, including sighting by the Department of Foreign Affairs and Trade.</p> <p>Sometimes referred to as a Police Check or clearance.</p> <p>Also see working with children check.</p>
Fraternisation:	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. It includes sexual behaviour not amounting to intercourse, a close and emotional relationship involving public displays of affection or private intimacy and the public expression of intimate relations.

	Where there are significant power imbalances at play (based on gender, age, ability, authority, social and economic inequality, etc) the potential for exploitative fraternisation is heightened.
Grooming	<p>Generally refers to behaviour that makes it easier for an offender to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child and then seek to sexualise that relationship (for example by encouraging romantic feelings or exposing the child to sexual concepts through pornography).</p> <p>Online Grooming: The act of sending an electronic message with indecent content to a recipient who the sender believes to be under 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 Australia Criminal Code Act 1995, Division 474 (telecommunications offences, subdivision C).</p>
Partner	For the purposes of this policy, partner(s) refers to any organisation or person that AOP works with to deliver services in Australia or in specific countries and has a formal Implementation Agreement in existence with AOP.
Preventing Sexual Exploitation, Abuse and Harassment (PSEAH)	An organisation's responsibility to put in place measures to protect people from sexual exploitation, abuse and harassment by their own personnel or associated personnel.
Reasonable Belief	<p>A reasonable belief is formed if a reasonable person in the same position would have formed the belief on the same grounds. Grounds for forming a belief are matters of which you have become aware, and any opinions in relation to those matters. Reasonable grounds may include:</p> <ul style="list-style-type: none"> • your own observations of behaviour. This may include observations of the behaviour of the person that you believe has been harmed, or the person that you believe has caused harm. • when someone tells you they, or another person, have been harmed. • when you hear about it from someone who is in a position to provide reliable information. <p>A belief on reasonable grounds is more than suspicion because there must be some objective basis for the belief, but it is not the same as having proof.</p>
Safeguarding	<p>Safeguarding is AOP's responsibility to make sure our staff and related personnel, programs and operations do no harm to children or adults and do not expose children or adults to the risk of harm and abuse.</p> <p>Safeguarding includes protecting children from all forms of child abuse and Preventing Sexual Exploitation, Abuse and Harassment (PSEAH). Safeguarding includes all the actions taken to protect and prevent as well as the steps taken respond if harm occurs.</p>
Sexual Exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from sexual exploitation of another.
Sexual Abuse	<p>The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual offences including but not limited to: attempted rape (which includes attempts to force someone to perform oral sex); and sexual assault (which includes non-consensual kissing and touching).</p> <p>All sexual activity with someone under the age of consent (in the law of the host country or under Australian Capital Territory law [16 years], whichever is greater) is considered to</p>

	be sexual abuse.
Sexual Harassment.	<p>A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favours or engages in other unwelcome conduct of a sexual nature, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated. Sexual harassment can take various forms. It can be obvious or indirect, physical or verbal, repeated or one-off and perpetrated by any person of any gender towards any person of any gender. Sexual harassment can be perpetrated against beneficiaries, community members, citizens, as well as staff and personnel.</p> <p>Some examples of behaviour that may be sexual harassment include:</p> <ul style="list-style-type: none"> ▪ staring or leering. ▪ unnecessary familiarity, such as unwelcome affection or touching. ▪ suggestive comments or jokes. ▪ insults or taunts of a sexual nature. ▪ intrusive questions or statements about your private life. ▪ displaying posters, magazines or screen savers of a sexual nature. ▪ sending sexually explicit emails or text messages. ▪ inappropriate advances on social networking sites. ▪ accessing sexually explicit internet sites. ▪ requests for sex or repeated unwanted requests to go out on dates; and ▪ behaviour that may also be considered to be an offence under criminal law such as physical assault, indecent exposure, sexual assault, stalking or obscene communications.
Staff	People employed by AOP on a permanent or temporary basis in Australia or overseas.
Survivor/Victim	<p>Refers to a person who has experienced sexual exploitation, abuse or harassment or a child that has experienced any form of child abuse.</p> <p>In the main AOP use the term survivor because it is the term generally preferred in psychosocial support because it implies resiliency. The term victim is also used, which is generally the term used in legal or medical sectors.</p>
Survivor Centred Approach³	<p>A victim/survivor-centred approach places the rights, wishes, needs, safety, dignity and well-being of the survivor/victim at the center of all safeguarding prevention and response measures concerning sexual exploitation and abuse (SEA) and sexual harassment (SH) and all forms of Child Abuse.</p> <p>A survivor-centered approach helps to promote a survivor’s recovery and to reinforce their capacity to make decisions about possible interventions. The guiding principles of the survivor-oriented include doing no harm, respect, safety, confidentiality and non-discrimination.</p> <p>Also refer to Best Interest of the Child</p>
Transactional Sex	The exchange of money, employment, goods or services for sex or sexual acts), even in places where sex work is legal.
Unacceptable	The portion of identified risk that cannot be tolerated, and that must be either eliminated or controlled.

³ Adapted from [Statement by Principals of the IASC on Accountability to Affected People in Humanitarian Action](#)

Risk	
Volunteer	A volunteer is a person who engages in an activity with AOP or its partners for no financial payment and is of the volunteer's own free will and without coercion. For the purpose of this Policy, volunteers include board members and interns as well as any visitor to one of AOP's or its partner's projects (including study tours, donors, and media personnel).
Vulnerable Adult	<p>People aged over 18 and</p> <ul style="list-style-type: none"> - who identify themselves as unable to take care of themselves or protect themselves from harm or exploitation; or - who due to their gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status - who is or has been impacted by natural disaster, conflict, or displacement. <p>For the purpose of this Policy, any adult that is receiving or accessing a service or program funded by, delivered by, or conducted in partnership with AOP are also defined as vulnerable adults. This approach recognises the inherent power imbalances between people delivering and receiving support, programs or services. It does not imply that people accessing programs or supports are generally regarded as vulnerable and is intended solely to ensure that AOP is comprehensive in its safeguarding duties.</p>
Working with Children⁴	Working with children means being engaged in an activity with a child where the contact would reasonably be expected to be a normal part of the activity and the contact is not incidental to the activity. Working includes volunteering or other unpaid works.
Working with Children Check	<p>A Working with Children Check is a legislated (legal) requirement for anyone who works or volunteers in child related work.</p> <p>Each state and territory in Australia have their own WWCC legislation and requirements. Checks involve a check of criminal history and a review of reportable workplace misconduct. Some checks also include a review of sex offender registers, child protection notifications, and working with children registers in other states.</p> <p>Information gathered through the check is not shared with employers. The outcome of a check is either a clearance to work with children or a bar (or negative notice) against working with children.</p> <p>Checks are continuously monitored.</p> <p>Checks are valid for 2 years (Northern Territory), 3 years (QLD and Western Australia) or 5 years (NSW, Victoria, ACT, South Australia, Tasmania) and unless revoked.</p>
Zero Tolerance	<p>Zero tolerance is not the same as zero incidents. Zero tolerance means that AOP:</p> <ul style="list-style-type: none"> • Identify, assess, control and treat safeguarding risks. • Ensure that recruitment processes screen for unsuitable people. • Take every safeguarding incident, complaint, concern, or allegation seriously. • Fully, fairly and promptly respond. • Hold all AOP representatives to the same professional standards and processes, regardless of their position or reputation in the organisation. • Learn from incidents to continually improve our safeguarding policy and practice.

⁴ DFAT, Child Protection Policy

Annex 2: Safeguarding Complaints Management Flow Chart



Action on Poverty Safeguarding Policy Complaints Flow Chart

<p>Who Can Report a Complaint</p>	<p>Child or young person</p>	<p>Parents or other adults</p>	<p>AOP staff or associated personnel</p>	<p>AOP partner organisations</p>				
<p>What to report</p>	<p>Any allegation, disclosure, observation or other reasonable belief of</p> <ul style="list-style-type: none"> • sexual exploitation, abuse or harassment or child abuse or exploitation of any kind. • breaches of AOP's Safeguarding Policy or Safeguarding Code of Conduct. 							
<p>When to report</p>	<p>If anyone is in immediate danger, do not wait, call emergency services immediately.</p> <p>All other concerns should be reported as soon as practically possible, but at least within 24 hours.</p>							
<p>How to report</p>	<ul style="list-style-type: none"> • Report to the Child Protection Focal Point in country, using the Child Protection Incident Reporting Form. • Email the safeguarding focal point: safeguarding@actiononpoverty.com 			<p>Use this QR Code to complete an online complaint form.</p>				
<p>What will happen with your report?</p>	<p>The AOP Safeguarding Focal Point is responsible to manage the report.</p> <table border="1"> <tr> <td data-bbox="389 1626 644 1975"> <p>Within 2 days: contact you to confirm receipt of the report</p> </td> <td data-bbox="660 1626 916 1975"> <p>Within 5 more days: assess the report to plan next steps. The Focal Point may also ask you some questions to better understand the report, how it can be resolved and any support you may need.</p> </td> <td data-bbox="938 1626 1193 1975"> <p>If the complaint is about possible criminal conduct, it will be reported to the police or other relevant authorities.</p> <p>We talk with you about this before making a report (unless its an emergency)</p> </td> <td data-bbox="1216 1626 1461 1975"> <p>If the complaint is about an AOP person, we will investigate.</p> <p>During this time, the safety and wellbeing of the survivor will be ensured and will be the primary consideration.</p> </td> </tr> </table>				<p>Within 2 days: contact you to confirm receipt of the report</p>	<p>Within 5 more days: assess the report to plan next steps. The Focal Point may also ask you some questions to better understand the report, how it can be resolved and any support you may need.</p>	<p>If the complaint is about possible criminal conduct, it will be reported to the police or other relevant authorities.</p> <p>We talk with you about this before making a report (unless its an emergency)</p>	<p>If the complaint is about an AOP person, we will investigate.</p> <p>During this time, the safety and wellbeing of the survivor will be ensured and will be the primary consideration.</p>
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<p>Possible outcomes</p>	<p>AOP provide ongoing support to survivor and others impacted by the report as required.</p>	<p>Criminal matters are investigated by appropriate authorities. AOP fully cooperates.</p>	<p>Possible workplace investigation outcomes include:</p> <ul style="list-style-type: none"> • Mandatory safeguarding training ¹⁶ • Formal warning and ongoing monitoring • Transfer to other duties • Suspension • Dismissal 					