

## 1. Introduction

The Leprosy Mission Nigeria believes in the fundamental right of children to grow up safely and enjoy a childhood that is free from exploitation and abuse.

TLMN is committed and obligated to ensuring child safety (including protection of children from exploitation and abuse) in all aspects of our work. All TLMN's programs and respective partners aim to create and maintain protective environments for children.

This policy provides a framework for protecting children from exploitation and abuse in the delivery of TLMN's programs.

TLMN's Child Protection Policy (CPP) follows five guiding principles:

1. Zero tolerance of child exploitation and abuse
2. Recognition of the best interests of the child
3. Sharing responsibility for child protection
4. A risk management approach
5. Procedural fairness.

TLMN is setting this standard for its staff both in the Abuja Headquarters Office and all field offices and programmes. Our collective responsibility is to follow this policy in our work. In doing so, we are doing everything we can to ensure a safe and secure childhood for children we have contact with in Nigeria

## 2. Protection of Children from Exploitation and Abuse

The need to protect children is an issue for all communities. Children across the world are subjected to exploitation and abuse, and experience sexual, physical, and psychological violation. Many are forced into exploitative work, including commercial sexual exploitation.

There are many factors that increase children's vulnerability to exploitation and abuse, including disability, being orphaned, displaced, homeless, or abandoned. During emergency and disaster situations, children are more likely to experience exploitation and abuse as a result of being separated from their parents and other caregivers who would normally protect them from such harm.

Child exploitation and abuse traumatises children and adversely affects their development and well-being. Children who are exploited and abused experience a greater likelihood of long-term consequences, including mental health issues, reduced educational outcomes, drug and alcohol abuse, and increased likelihood of coming into contact with the law. At its core, child exploitation and abuse undermines a child's right to grow up safely.

### **3. TLMN's Christian Perspective**

TLMN acknowledges the need to protect children and young people, and to minimise the risk of them being abused. TLMN expects the highest standards of professional practice in all our work and contact with children.

TLMN believes that:

- God loves children
- children have the right to a happy, healthy, and secure childhood
- the welfare of the child is paramount
- child abuse is never acceptable
- the abuse of children is an abuse of their rights as set out in the *United Nations Convention of the Rights of the Child*.

#### **3a. TLMN Policy Commitment**

TLMN acknowledges that it is always unacceptable for a child to experience any kind of abuse. TLMN recognises the need to protect children and young people, and to minimise their risk of being abused. This policy has been written to ensure that TLMN takes every possible measure to prevent abuse. It aims to ensure that none of its staff, volunteers, partners, or other representatives engage in behaviour that could be misinterpreted by children, their families, or other adults as constituting or leading to abuse.

#### **4. Rationale for TLMN's Child Protection Policy**

There is international recognition that adults who have a formal role in working with or supporting children are in positions of trust and authority. The relationship between an adult and child is not a relationship between equals. Children are dependent on adults to care for and protect them.

It is a shared and collective responsibility of all adults to prevent child exploitation and abuse. TLMN has adopted this policy in recognition of its responsibilities as a Civil Society Organisation receiving funds from various international organisation (e.g DFID, DFAT, EU etc). TLMN is committed to working with its respective partners to prevent and respond to child exploitation and abuse.

Child sex offenders often seek employment or volunteer placements in organisations that work with children in Nigeria. They might be attracted to working in NGOs like TLMN to access vulnerable children and to avoid tougher laws. This policy sends a clear message that child exploitation and abuse is not tolerated and attracts disciplinary and commercial sanctions.

### **5. Policy Goal and Objective**

#### **5a. Goal**

To protect children from exploitation and abuse of all kinds in the delivery of TLMN's programs.

#### **5b. Objective**

To create and maintain protective environments for children in TLMN's programs.

## 6. Scope of Policy

This policy applies to:

- TLMN staff, including those who work:
  - full time
  - part time
  - casually (volunteers);
- Partner organisations that receive funds through TLMN, including:
  - Government personnel
  - Implementing Partners personnel
  - all Ministries, Departments, Agencies that receive TLMN funds;
- Individual contractors funded by TLMN, including:
  - consultants
  - researchers
  - students
  - photographers;
- All “others,” including:
  - visitors to TLMN-funded IC programs and projects
  - TLMN-organised tour group members
  - any other individuals or groups working or volunteering for TLMN in a capacity that may involve contact with children.

## 7. Guiding Principles

*(Adapted from Nigeria’s Child’s Rights Acts (2003) and DFAT’s Child Protection Policy 2017)*

This policy is guided by the following principles:

### 7a. Zero tolerance of child exploitation and abuse

TLMN does not tolerate child exploitation and abuse. Such action attracts criminal, civil, and disciplinary sanctions. TLMN works to reduce the risks of child exploitation and abuse associated with delivering aid activities, and trains its staff on their obligations. TLMN will not knowingly engage—directly or indirectly—anyone who poses an unacceptable risk to children. TLMN will not fund any individual or organisation that does not meet TLMN’s child protection compliance standards in their operations and activities.

### 7b. Recognition of the best interest of the child

Nigeria is a signatory to the *United Nations Convention on the Rights of the Child* (*Signed on the 26<sup>th</sup> of January 1990 and Ratified on the 19<sup>th</sup> of April 1991*), and TLMN is committed to upholding the rights and obligations under this convention. TLMN recognises that some children, such as those with disability and children living in areas impacted by disasters, are particularly vulnerable.

### 7c. Sharing responsibility for child protection

To effectively manage risks to children, TLMN requires the commitment, support, and cooperation of staff, contractors, partners, and others connected to the organisation. They must meet the terms of this policy and will be held accountable, through contracts, audits, and spot checks, for complying with it.

#### **7d. A risk management approach**

While it is not possible to eliminate all risks of child exploitation and abuse, careful management can reduce the risks to children that may be associated with aid activities. These are identified during initial risk assessments and are managed for the duration of the aid activity.

#### **7e. Procedural fairness**

TLMN uses fair and proper procedures when making decisions that affect a person's rights or interests. Our partners are expected to adhere to this principle when responding to concerns or allegations of child exploitation and abuse.

### **8. Implementation within TLMN**

*(Adapted from Nigeria's Child's Rights Acts (2003) and DFAT's Child Protection Policy 2017)*

#### **8a. Ensuring coordinated policy implementation**

The TLMN Management Team is responsible for:

1. Responding to reports of child exploitation and abuse, and policy non-compliance in a timely manner
2. Conducting child protection audits and spot checks to monitor the child protection systems of contractors and partner organisations
3. Monitoring internal and external compliance with the policy
4. Providing child protection training for TLMN staff
5. Reviewing the policy every five years.

#### **8b. Increasing staff awareness of child protection obligations under the policy**

TLMN's staff receive regular training on child protection issues and on their obligations under this policy, including mandatory reporting of concerns or allegations of child exploitation and abuse. Training is compulsory for all staff and included in courses delivered at induction and before staff are deployed (see Attachment 13 for details of training).

TLMN staff must:

1. Immediately report any concerns or allegations of child exploitation and abuse, and policy non-compliance, by anyone covered by the policy
2. Complete child protection training and as part of that, acknowledge their responsibilities by signing TLMN's Child Protection Code of Conduct (See Attachment 2). They must comply with the code of conduct during the course of their employment
3. Consider child protection as part of the initial risk assessment for activities in Implementing Countries and throughout the program management cycle.

#### **8c. Internal recruitment and screening processes**

TLMN's internal recruitment processes include stringent screening measures to ensure

that inappropriate people are not employed by the agency. These include criminal record checks (or appropriate equivalent<sup>1</sup>) and background checks on all successful candidates before they begin work. Additional screening measures are incorporated into the selection processes for positions that involve working with children.

#### **8d. Internal procedures for handling reports related to child exploitation and abuse**

TLMN has internal procedures for handling reports related to child exploitation and abuse<sup>2</sup> and notifies relevant law enforcement agencies as appropriate. These procedures outline obligations and responsibilities for reporting on and managing concerns about inappropriate behaviour and are summarized in Attachments 3a and 3b.

#### **8e. Ensuring appropriate use of communications systems**

TLMN's guidelines on appropriate use of its communications systems apply to child exploitation material. Using the organisation's systems to access child exploitation material or to engage in online grooming is unacceptable and is dealt with promptly, including, as appropriate, reporting to relevant law enforcement agencies.

#### **8f. Incorporating child protection strategies into risk management procedures**

Risk management procedures are integrated into a comprehensive set of compliance and control systems embedded in TLMN operating processes. Risks to children are identified during initial risk assessments and are managed for the duration of the program's activities. The TLMN Risk Management procedures are reviewed six-monthly at Finance and Audit Committee meetings.

All projects in TLMN's Program are assessed for level of child protection risk according to *DFAT's Guidance Note on Establishing Child Protection Risk Context* (Attachment 14). If a project is found to have a moderate to high level of child-protection related risk, a project level risk assessment is conducted using the implementing partner's Risk Management Framework.

#### **8g. Ensuring risks to children are managed in insecurity and humanitarian disaster responses**

TLMN recognises that children living in areas impacted by insecurity and disasters are particularly vulnerable. Risks to children must always be considered when developing internally displaced and humanitarian disaster response activities.

#### **8h. Child Protection Code of Conduct**

All TLMN staff must comply with TLMN's Child Protection Code of Conduct (Attachment 2), which sets stringent standards for personal behaviour. TLMN expects staff to use common sense and avoid actions or behaviours that could be construed as child exploitation and abuse in the course of their association with TLMN.

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<sup>1</sup> TLMN recognises that in limited instances it may prove impossible to obtain a reliable criminal record check. A statutory declaration outlining efforts made to obtain a national police check, and disclosing any charges and spent convictions related to child exploitation, may be accepted in lieu.

<sup>2</sup> TLMN adheres to *Handling misconduct: a human resources practitioner's guide to the reporting and handling of suspected and determined breaches of the APS Code of Conduct* <http://www.apsc.gov.au/publications-and-media/current-publications/handling-misconduct>.

## **8i. Reviewing the child protection policy regularly**

This policy will be reviewed every five years, and lessons learnt will be incorporated into subsequent versions.

## **9. TLMN's expectations of partner organisations and contractors**

TLMN has mandatory child protection compliance standards to ensure that partner organisations and contractors understand and act on their obligations for managing risks to children. All partner organisations and individual contractors are expected to immediately notify TLMN's Management Team if any TLMN-funded personnel, or TLMN partner personnel, are accused of, charged with, arrested for, or convicted of criminal offences relating to child exploitation and abuse.

### **9a. Core partners**

TLMN requires core partners to develop and implement a TLMN-compliant child protection policy in accordance with the Compliance Guide (Attachment 1). The policy must apply to all personnel, volunteers, civil society organisations, and subcontractors who are engaged by a core partner to perform any part of an activity that receives TLMN funding. Core partners must ensure that any program participants and partners comply with the relevant child protection standards, including ensuring civil society organisations and subcontractors have a TLMN-compliant Child Protection Policy.

### **9b. Civil society organisations and contractors**

Contractor and civil society organisations play an important role in protecting children. TLMN-funded contractors and civil society organisations are required to develop and implement TLMN-compliant Child Protection Policies in accordance with the Compliance Guide (Attachment 1), which consists of nine standards that provide a framework for managing and reducing the risks of child exploitation and abuse. The organisation's child protection policy must apply to all personnel, partners, and subcontractors who are engaged by a contractor or civil society organisation to perform *any part* of a TLMN-funded activity. Those using TLMN funds to engage an organisation or individual subcontractor must ensure the organisation or individual subcontractor complies with the relevant child protection standards.

### **9c. Individual contractors**

Individual contractors for TLMN who are in contact with children are required to sign TLMN's Child Protection Code of Conduct (Attachment 2), and to ensure they comply with this during their employment. Individual contractors must obtain a criminal record check before they are contracted. Those using TLMN funds to engage an organisation or individual subcontractor must ensure the organisation or individual subcontractor complies with the relevant child protection standards.

### **9d. Volunteers**

TLMN's Child Protection Policy, developed in accordance with the Compliance Guide (Attachment 1), applies to all volunteers who are engaged by TLMN, to perform or participate in any part of a program activity. Volunteers must comply with the relevant child protection standards and those who are in contact with children are required to sign TLMN's Child Protection Code of Conduct (Attachment 2), and to ensure they comply with this during their volunteering period.

## 10. TLMN's compliance mechanisms

*These have been developed in accordance with the Child's Rights Act (2003) and DFAT Minimum Child Protection Standards (Attachment 1).*

### Compliance Standard 1

TLMN has a child protection policy that applies to all personnel, partners and subcontractors that are engaged by the contractor or civil society organisation to perform any part of a TLMN-funded activity.

Our due diligence framework requires all potential partners are compliant with TLMN policy and standards.

*Why is this required?*

A child protection policy provides clear guidance and demonstrates how the organisation, across its operations, will ensure that children are protected from child exploitation and abuse in the delivery of TLMN-funded activities.

*Evidenced by:*

- Child Protection Policy.
- Personnel are aware of the organisation's Child Protection Policy (that is, through internal communication and training).  
*Refer Above: 6, 8a.2, 8a.3, 8a.4, 8b, 8b.2, 8c, 8h*
- Documented plan for ensuring TLMN-funded implementing partners are meeting the minimum standards set out in the expectations section of this policy.  
*Refer: Attachment 4*

### Compliance Standard 2

TLMN's Child Protection Policy includes a documented reporting procedure for child exploitation and abuse allegations and policy non-compliance, including available sanctions for breaches.

*Why is this required?*

- An effective child protection policy requires a report handling procedure. One of the biggest hurdles to personnel reporting child exploitation and abuse is that there is no formal system in place to do so, or that personnel are not aware of a formal system to report concerns or allegations;
- Reporting systems must respect the rights of the alleged victim and alleged offender.

*Evidenced by:*

- TLMN's guidelines for managing concerns or allegations of child exploitation and abuse, and policy non-compliance.  
*Refer Above: 8a.1, 8b, 8b.1, 8d, 9, Attachments 3a and 3b*
- Documentary evidence that personnel can raise concerns about a child's safety or well-being or unacceptable behaviour by personnel.  
*Refer Above: 8a.1, 8b, 8b.1, 8d, 9, Attachments 7a and b*
- Documentary evidence outlining TLMN's details of available sanctions for breaches of the code of conduct.

*Refer Above: 8a.3, 8b.2, 8h, Attachment 3a*

### **Compliance Standard 3**

TLMN provides child protection training for personnel.

*Why is this required?*

- Personnel must be fully aware of their responsibilities to protect children and how to report concerns or allegations about child exploitation and abuse.

*Evidenced by:*

- Training agendas and timeframes for training.  
*Refer: Child Protection Training Manual*
- Materials used in training.  
*Refer: Child Protection Training Manual*

### **Compliance Standard 4**

TLMN's Child Protection Policy commits it to preventing a person from working with children if they pose an unacceptable risk to children.

*Why is this required?*

- Provides the TLMN with clear grounds as an employer to determine whether a person is the most appropriate to work with children.

*Evidenced by:*

- Referenced in relevant documentation, including policies, contracts and human resource guidelines.  
*Refer: 8a.3, 8c, 8d, TLMN Policies, H.R. Manual*

### **Compliance Standard 5**

TLMN's child protection policy is subject to regular review—at least every five years, or earlier if warranted.

*Why is this required?*

- Contexts change, particularly in the development sector. There must be a commitment to review and update the policy as required;
- Given that child protection policies are relatively new for many organisations, it is important that TLMN can learn and adapt from its experiences in implementing its child protection policy.

*Evidenced by:*

- Timetable/timeframe for review.  
*Refer: Attachment 9*
- Policy review report at least every five years.  
*Refer: 8a.5, 8i*
- Records of consultation with TLMN on policy review.  
*Refer: Attachment 10*



## **Compliance Standard 6**

TLMN undertakes a risk assessment that covers all TLMN-funded activities that have contact with children. The assessment should identify risks, classify any high-risk activities, and document steps being taken to reduce or remove these risks.

Our due diligence framework requires all potential partners to be assessed for risks and strengths before agreements are entered into.

*Why is this required?*

- Some activities are higher risk than others. This may be due to the nature of the activity or the location. For example, working with children with disability or in an emergency situation.

*Evidenced by:*

- Risk log identifying high risk activities and measures to reduce or remove the risk to children.  
*Refer: 8b.3, Attachment 12*
- Evidence that risk assessments are reviewed/updated throughout the lifecycle of the activities.  
*Refer: 8f, Attachment 9*

## **Compliance Standard 7**

TLMN's employment contracts contain provisions for dismissal, suspension, or transfer to other duties for any employee who breaches the Child Protection Code of Conduct.

Under current agreements and MOUs, TLMN can require individuals to be removed from working on an activity, and can also require anyone under formal investigation to be suspended from duty or transferred to other duties during said investigation. This right is exercised when an individual has been convicted of a criminal offence relating to child exploitation and abuse, or when it is considered that an individual poses an unacceptable risk to a child's safety or well-being.

In line with procedural fairness principles, TLMN reserves the right to terminate contract negotiations if appropriate criminal record checks are not provided. TLMN will not engage an individual, or will require an individual to be replaced, if there is an unacceptable risk to a child's safety or well-being).

*Why is this required?*

- Reinforces the importance of TLMN's policy to personnel;
- Ensures TLMN has legal recourse to remove or transfer personnel who pose an unacceptable risk to children.

*Evidenced by:*

- Contract with personnel.  
*Refer: 8a.3, 8h, Staff Contracts*

## **Compliance Standard 8**

TLMN has robust recruitment screening processes for all personnel in contact with children.

These recruitment procedures include:

- criminal record check before engagement
- verbal referee checks
- interview plans that incorporate behavioural-based interview questions. These are to be used when candidates are applying for positions that involve working with children.

*Why is this required?*

Child-safe recruitment and screening processes are essential to enable an organisation to choose the most appropriate person for a position that involves contact with children.

*Evidenced by:*

- Documented criminal record checks for personnel in contact with children.  
*Refer Above: 8c, 9c*
- Documented verbal referee checks.  
*Refer Above: 8c, 9c*
- Interview plans incorporating behavioural-based interview questions that are specific to positions that involve working with children.  
*Refer: Attachment 5*
- Documented request for an applicant to disclose whether they have been charged with child exploitation offences and their response.  
*Refer: Attachment 6*

### **Compliance Standard 9**

TLMN has a Child Protection Code of Conduct that meets the minimum standard set by DFAT.

Compliance is monitored through performance assessments, reviews, evaluations, TLM country office audits and other random audits and spot checks.

*Why is this required?*

- A Code of Conduct protects children and personnel. It makes clear TLMN's standards for acceptable and unacceptable behaviour in relation to children and must be signed by all personnel;
- It protects personnel by providing guidance on how to avoid situations that may be perceived as harmful to children. It also provides employers with a sound basis on which to conduct disciplinary action.

*Evidenced by:*

- A child protection code of conduct based on DFAT's Child Protection Code of Conduct.  
*Refer: 8b.2, 8h, signed copies of Attachment 2*
- Signed codes of conduct or a register documenting details of personnel who have signed the code of conduct.  
*Refer: 8b.2, 8h, Attachment 8*

## Revision History (see Attachment 10 for more details)

Version	Date	Author	Summary
1.0	27/8/2018	Sunday Udo	New draft created for next revisions

## Document Approval History

Version	Date	Approved by
1.0	8 <sup>th</sup> November	TLM-Nigeria Board

## Attachments

1. Compliance Guide for a Child Protection Policy (DFAT Minimum Child Protection Standards)
2. Child Protection Code of Conduct
- 3a: Internal Procedures for Handling Reports of Misconduct
- 3b: Checklist for Employee Suspension
4. Checklist to help Partners to Achieve CPP Expectations
5. Interview Questions Relating to Child Protection
6. Criminal Offense Disclosure Form
- 7a: Mandatory Reporting Process for TLMN Staff and TLMN Partner Organisations
- 7b: Report of a Reasonable Suspicion of Child Abuse and Neglect
8. Signed Code of Conduct and Police Check Register
9. Time Line for Child Protection Policy Implementation and Review
10. Records of consultation with TLMN on policy review
11. Child Protection Risk Assessment Template
12. Child Protection Risk Register
13. Guidelines for Child Protection Training
14. DFAT Guidance notes on Establishing Child Protection Risk Context

## Attachment 1: DFAT Minimum Child Protection Standards

Requirement	Minimum standard	Minimum standard – evidence	Why is this required?	What is the risk without it?
Having a Child Protection Policy and reporting procedure in place	<p><b>1.</b> The organisation has a child protection policy that applies to all personnel, partner's downstream personnel and subcontractors that are engaged by the organisation to perform any part of a DFAT funded activity.</p> <p>The managing partner must ensure the downstream organisation or individual subcontractor complies with the minimum child protection standards.</p>	<ul style="list-style-type: none"> <li>- Child protection policy in place</li> <li>- Personnel aware of the organisation's child protection policy (e.g. through internal communication and training)</li> <li>- Documented plan for ensuring downstream DFAT funded partners are meeting the minimum standards</li> <li>- Initial risk assessment of organisation and activities to inform policy development</li> </ul>	A child protection policy provides clear guidance and demonstrates how the organisation, across its operations, will ensure that children are protected from child exploitation and abuse in the delivery of DFAT administered/ funded programs.	<p>An organisation is unaware of the risks to children within their organisation and the activities they manage and/or implement.</p> <p>Having a sub-contractor sign up to a code of conduct as the only control does not provide sufficient contractual effect to address child protection issues.</p>
	<p><b>2.</b> The organisation's child protection policy includes a documented reporting procedure for</p>	<ul style="list-style-type: none"> <li>- Organisation's guidelines for managing concerns or allegations of child exploitation and</li> </ul>	An effective child protection policy requires a report handling procedure.	<p>Personnel are unaware how to report concerning behaviour.</p> <p>Community members</p>

	<p>child exploitation and abuse allegations, code of conduct and policy non-compliance, including available sanctions for breaches.</p>	<p>abuse, and policy non-compliance</p> <ul style="list-style-type: none"> <li>- Documentary evidence that personnel can raise concerns about a child's safety or well-being or unacceptable behaviour by personnel</li> <li>- Documentary evidence outlining the organisation's details of available sanctions</li> <li>- Documentary evidence of externally facing policy and reporting information</li> </ul>	<p>One of the biggest hurdles to personnel reporting child exploitation and abuse is that there is no formal system in place to do so, or that personnel or community members are not aware of a formal system to report concerns or allegations.</p> <p>Reporting systems must respect the rights of both the alleged victim and the alleged offender.</p>	<p>are unaware how to report concerning behaviour.</p>
	<p><b>3.</b> The organisation provides child protection training for personnel.</p>	<ul style="list-style-type: none"> <li>- Training attendance records</li> <li>- Training agendas and timeframes for training</li> <li>- Materials used in training</li> </ul>	<p>Personnel must be fully aware of their responsibilities to protect children and how to report concerns or allegations about child exploitation and abuse.</p>	<p>Personnel are unaware of behaviour that would arouse concern.</p> <p>Personnel are unaware of how to build child protection practices into their work. Personnel do not know how to report concerning behaviour.</p>

	<p><b>4.</b> The organisation's child protection policy includes a commitment to preventing a person from working with children if they pose an unacceptable risk to children.</p>	<ul style="list-style-type: none"> <li>- Referenced in relevant documentation, including policies, contracts and human resource guidelines</li> </ul>	<p>The organisation, as an employer, must have clear grounds to determine whether a person is the most appropriate to work with children.</p>	<p>A lack of leadership and governance and the right culture undermine personnel efforts to implement a child protection environment.</p>
	<p><b>5.</b> The organisation's child protection policy is subject to regular review, at least every five years or earlier if needed.</p>	<ul style="list-style-type: none"> <li>- Policy is subject to regular review in accordance to the policy commitment, or at least every five years</li> </ul>	<p>Contexts change, particularly in the development sector. There must be a commitment to review and update the policy as required.</p>	<p>Lessons learned from previous incidents are not taken into account, increasing the likelihood that those risks will be repeated.</p>
<p><b>Undertaking risk assessment</b></p>	<p><b>6.</b> The organisation undertakes a risk assessment to reduce the risk of any child being harmed as a result of operations or activities funded by DFAT. The assessment must identify risks, and document steps being taken to reduce or remove these risks.</p>	<ul style="list-style-type: none"> <li>- Risk plan identifying activities and measures to reduce or remove the risk to children</li> <li>- Documentation that risk assessments are reviewed and updated regularly during the life of the activity</li> <li>- Evidence of adaption to local context (when a different</li> </ul>	<p>Some activities are higher risk than others. This may be due to the nature of the activity or the location. For example, working with children with disability or in an emergency situation involve higher risks.</p>	<p>Risks to children are missed during activity design and implementation.</p>

		approach to standard risk controls is required)		
Recruitment and screening, and employment practices in place	<p><b>7.</b> The organisation's employment contracts contain provisions for suspension or transfer to other duties of any employee who is under investigation and provisions to dismiss any employee after an investigation</p>	<ul style="list-style-type: none"> <li>- Employment contracts for personnel/consultants contain appropriate provisions</li> </ul>	Robust recruitment, screening and employment practices reinforce the importance of the organisation's child protection policy to personnel.	Personnel that pose unacceptable risks to children are unable to be removed (suspended, transferred or terminated) without a criminal conviction, where contracts are in place.
	<p><b>8.</b> <b>Contact with children positions</b> The organisation has robust recruitment screening processes for all personnel in contact with children. These recruitment procedures include:</p> <ul style="list-style-type: none"> <li>- criminal record checks before engagement</li> <li>- verbal referee</li> </ul>	<ul style="list-style-type: none"> <li>- Documented criminal record checks for personnel in contact with children</li> <li>- Documented verbal referee checks</li> <li>- Documented request for an applicant to disclose whether they have been charged with child exploitation offences, and their response</li> <li>- Interview plans</li> </ul>	<p>Child-safe recruitment and screening processes are essential to enable an organisation to choose the most appropriate person for a position that involves contact with children.</p> <p>Recruitment and selection can strengthen external inhibitors by preventing access to</p>	<p>Adults with a background of unacceptable risks to children target organisations that will provide opportunities to be in contact with children.</p> <p>A person who poses an unacceptable risk of harm to children (as indicated by their background) is</p>

	<p>checks</p> <p><b>Working with children positions</b></p> <p>Additional screening measures (such as interview plans that incorporate behavioural-based interview questions) must be used when candidates are applying for positions that involve working with children.</p>	<p>incorporating behavioural-based interview questions that are specific to positions that involve working with children</p> <ul style="list-style-type: none"> <li>- Review checks when personnel have a change in circumstances</li> <li>- 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</li> <li>- Checks must be conducted for each country in which the individual has lived for 12 months or</li> </ul>	<p>children by those with a known history of harming children.</p> <p>Child safe recruitment and selection processes can discourage individuals who pose an unacceptable risk to children from applying for positions.</p>	<p>unknowingly appointed to a position within the organisation.</p>
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		longer over the last 5 years, and for the individual's countries of citizenship		
	<p><b>9.</b> The organisation has a child protection code of conduct that meets the minimum standard set by DFAT (see Attachment B – DFAT's Child Protection – Professional Behaviours).</p>	<ul style="list-style-type: none"> <li>- A risk based child protection code of conduct based on DFAT's Child Protection – Professional Behaviours</li> <li>- Signed codes of conduct or a register documenting details of personnel who have signed the code of conduct, or inclusion in employment contracts</li> <li>- Signed image consent forms/ verbal consent file notes</li> </ul>	<p>A code of conduct makes clear the organisation's standards for acceptable and unacceptable behaviour in relation to children, including use of images and must be signed by all personnel.</p> <p>It protects personnel by providing guidance on how to avoid situations that may be perceived as harmful to children. It also provides employers with a sound basis on which to conduct disciplinary action.</p>	<p>Lack of clear, well-advertised rules allows concerning behaviour to go unchallenged. Identification of a child and/or their whereabouts.</p>

## Attachment 2: Child Protection Code of Conduct

I, \_\_\_\_\_ [insert name], acknowledge that I have read and understand TLMN's Child Protection Policy and agree that in the course of my association with TLMN, I must:

- > treat children with respect regardless of race, colour, gender, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status
- > not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate
- > not engage children under the age of 18 in any form of sexual intercourse or sexual activity, including paying for sexual services or acts
- > wherever possible, ensure that another adult is present when working in the proximity of children
- > not invite unaccompanied children into private residences, unless they are at immediate risk of injury or in physical danger
- > not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible (noting that this does not apply to my own children)
- > use any computers, mobile phones, video cameras, cameras or social media appropriately, and never to exploit or harass children or access child exploitation material through any medium
- > not use physical punishment on children
- > not 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 significant risk of injury
- > comply with all relevant Nigerian and local legislation, including labour laws in relation to child labour
- > immediately report concerns or allegations of child exploitation and abuse and policy non-compliance in accordance with appropriate procedures
- > immediately disclose all charges, convictions and other outcomes of an offence that relates to child exploitation and abuse, including those under traditional law, which occurred before or occurs during association with DFAT

- > not develop any 'special' relationships with children that could be seen as favouritism (for example, the offering of gifts or special treatment for specific children)
- > be aware of behaviour and avoid actions or behaviours that could be perceived by others as child exploitation and abuse

**When photographing or filming a child or using children’s images for work-related purposes, I must:**

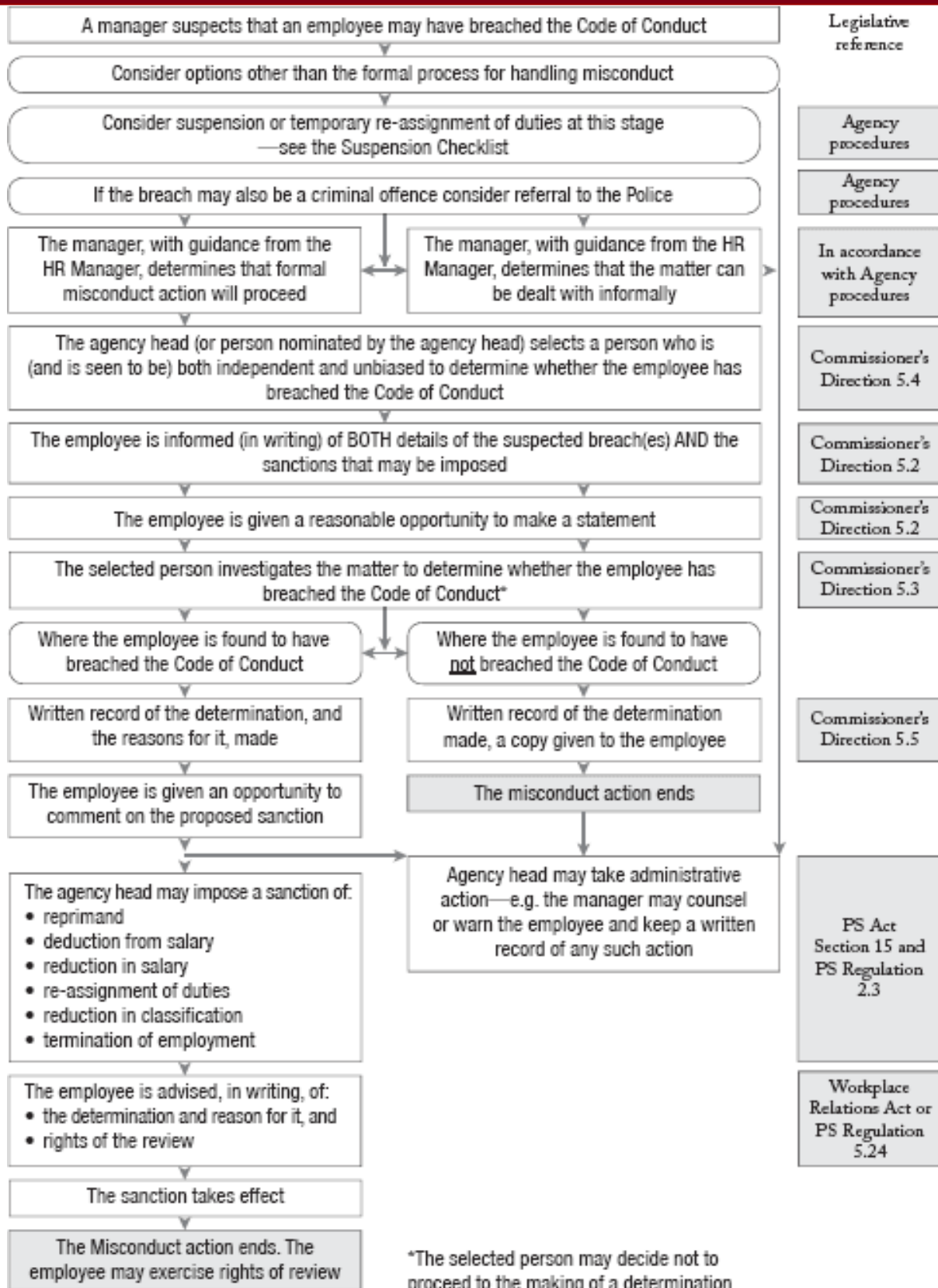
- > take care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child
- > obtain informed consent from the child and parent or guardian of the child before photographing or filming a child. As part of this I must explain how the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

I understand that the onus is on me, as a person associated with TLMN, to use common sense and avoid actions or behaviours that could be construed as child exploitation and abuse.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

## Attachment 3a: Internal Procedures for Handling Reports of Misconduct



## Attachment 3b: Checklist for Employee Suspension

### Deciding whether or not to suspend<sup>3</sup>

- Is it in the public interest, or the agency's interest, to remove the employee from the workplace?
- Has re-assignment of duties been considered as an option?
- Is it clear that the decision maker is not prejudging and is seen as not prejudging whether the employee has breached the Code?

### When imposing suspension

- Will the suspension be with pay or without pay?
- Has there been an opportunity for the employee to make a statement before the suspension is implemented?
- Has the employee been advised of the possible length of the suspension and of his/her ongoing status (e.g. attendance at training courses previously booked, entitlement to apply for vacancies, access to the work premises)?

### Where suspension is without pay

- Has the employee been advised about possible access to leave credits?
- Has the employee been advised about the length of the period of suspension and the fact that he/she could seek outside employment?

### During suspension

- Is the suspension being reviewed at reasonable intervals?
- Are there exceptional circumstances warranting the extending of unpaid suspension beyond 30 days?

### Where it is determined that the employee suspended without pay has not breached the Code of Conduct

- Is salary forgone during suspension to be reinstated or is there a case for not doing so?
- Is it appropriate to re-credit any paid recreation leave or long service leave applied for during suspension?
- Is it appropriate to take outside earnings into account before reinstating forgone salary?

### Terminating the suspension

- Has a sanction been imposed on the employee for the relevant breach? OR
- Does the agency head no longer believe that the employee has or may have breached the code? OR
- Does the agency head no longer believe that the suspension is in the public interest or in the agency's interest?

### At the conclusion of the period of suspension

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<sup>3</sup> Regulation 3.10 requires that an Agency Head may suspend an APS employee employed in the agency from duties if the Agency Head believes on reasonable grounds that:

- a. the employee has, or may have, breached the Code of Conduct; and
- b. the employee's suspension is in the public, or the agency's interest.

- Is it necessary to decide whether the period of suspension counts as service?
- Has the appropriate documentation been completed?

## Attachment 4: Checklist to help Partners to Achieve CPP

1. MOU in place between TLMN and Partner Organisation (including Core Partners, Civil Society Organizations, Individual Contractors, and Volunteers).
2. TLMN Child Protection Policy compliance standards explained to Partner Organisation, ensuring they understand and act on their obligations for managing risks to children.
3. Partner Organisation develops and implements its own TLMN-compliant Child Protection Policy in accordance with the Compliance Guide (Attachment 1), which consists of nine standards that provide a framework for managing and reducing the risks of child exploitation and abuse.
4. Partner Organisation develops and implements its own TLMN-compliant Code of Conduct (Attachment 2), which is signed by all staff and (international) volunteers, and re-signed with every new contract.
5. Partner Organisation staff and (international) volunteers must obtain a criminal record check (or accepted equivalent<sup>4</sup>) before they are employed, and with every new contract.
6. The Partner Organisation's Child Protection Policy, Criminal Record Check, and Code of Conduct must apply to all personnel, (international) volunteers, Civil Society Organisations, and subcontractors who are engaged by the Partner Organisation to perform any activity that receives TLMN funding. Partner Organisations must ensure that any program participants and other partners comply with child protection standards.
7. TLMN or designated trainers within the implementing country conduct Child Protection training conducted for all staff of Partner Organisation.
8. Partner Organisations are informed how to immediately notify TLMN's Management Team if any of their personnel are accused of, charged with, arrested for, or convicted of criminal offences relating to child exploitation and abuse.

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<sup>4</sup> TLMN recognises that in limited instances it may prove impossible to obtain a reliable criminal record check. A statutory declaration outlining efforts made to obtain a national police check, and disclosing any charges and spent convictions related to child exploitation, may be accepted in lieu.



## Attachment 5: Interview Questions Relating to Child Protection

The following questions are a necessary part of our child protection process. Please answer them as honestly as you can. The answers you provide will be kept confidential where possible, but may be provided to other senior staff within this organization if necessary.

- This organization has a Child Protection Policy. What is your understanding about having such a policy?  
*Note: Briefly explain the reason and content policy, if the applicant does not have a good understanding.*
- Why do you think it is important to abide by such a policy?  
*Note: Expect an answer that is about the protection and safety of children.*
- What type of behavior towards children would be culturally acceptable for you or your colleagues, when you find that children are present, as you perform your work activities?  
*Note: Expect an answer that mentions: respect for children as people, limited and/or culturally acceptable physical contact, always being in the presence of others, etc).*
- Please describe any good experiences you have had interacting with children or young people in the past?  
*Note: Was the good experience described culturally acceptable or usual?*
- What type of behavior towards children would NOT be culturally acceptable for you or your colleagues, when you find that children are present as you perform your work activities?  
*Note: Expect an answer that mentions: disrespect for children as people, culturally unacceptable physical contact, deliberately organizing to be alone with the child, etc).*
- Please describe any bad experiences you have had interacting with children or young people in the past?  
*Note: Was the bad experience described culturally acceptable or usual?*
- Please describe a situation where you have disciplined a child or young person recently?  
*Note: Was the discipline done in a culturally acceptable way?*
- Have you ever been accused of, charged with, arrested for, or convicted of criminal offences relating to child exploitation and abuse? If yes, please explain the situation, what happened and why you were arrested or convicted?
- Have you ever been investigated for violent or sexually related offences? If yes, please explain the circumstances?
- If you suspect or see that another staff member is behaving inappropriately

towards children, what would you do?

*Note: Expect an answer that mentions: Report the behavior or incident to a senior staff member, keep the situation confidential but expect some type of investigation, follow-up with a more senior staff member if you see no action has been taken after a few weeks.*

- Is there any other information relating to your suitability for this position that we should be aware of?

## Attachment 6: Criminal Offense Disclosure Form

Name \_\_\_\_\_ Date of Birth \_\_\_\_\_  
 \_\_\_\_\_

Former Names / Other Names \_\_\_\_\_  
 \_\_\_\_\_

Passport Number \_\_\_\_\_ Place of Issue \_\_\_\_\_ Expiry Date \_\_\_\_\_

Electoral / Identity Card Number \_\_\_\_\_ Expiry Date \_\_\_\_\_

Driver's License number \_\_\_\_\_ Place of issue \_\_\_\_\_ Expiry Date \_\_\_\_\_

Date of Criminal Offense <small>Estimate date if not known</small>	Criminal Offense	Location (City, State) Arresting Agency
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		

### Disclosure of Criminal Offense Record

List all arrests, convictions, and serious motor vehicle offenses (other than minor traffic violations) incurred as an adult, regardless of how long ago. *If you have no offenses to report, please indicate by putting N/A on first line.*

### Important

- This form is required of all applicants to The Leprosy Mission (TLM). Disclosure must be made if requested by TLM post-interview. Any change that occurs if employed, must be disclosed as soon as possible to the Human Resources Manager.
- Disclose all history of legal accusation, charges, arrests, or convicted of criminal offences relating to serious motor vehicle or traffic offenses, substance abuse offences, violence or sexually related offences, child exploitation and abuse, felonies and misdemeanors.

- Criminal offenses are evaluated by TLM on an individual basis, with consideration given to the nature and circumstances of the offense. The existence of a criminal offense record is not necessarily cause for disqualification of an application or dismissal from the organisation.
- If you fail to list any part of your criminal offense history, including omission and intentional falsification, your application to TLM may be disqualified and you may lose your opportunity for employment.

### **Signature and Release**

I certify that this information on my criminal offense disclosure form and criminal record (attached) is correct and complete.

I understand that providing false or incomplete information, or withholding information by omission or intention, may be cause for disqualification of employment application to TLM and loss of opportunity for employment.

I understand that TLM may contact referees, supervisors, and other individuals to clarify information supplied in the my application.

I understand that in unusual circumstances, TLM may see it necessary to share the findings of the background check with TLM senior management.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_



## Attachment 7b: Report of a Reasonable Suspicion of Child Abuse

### Details of child subject to report

Family name \_\_\_\_\_  
\_\_\_\_\_

Given names

Address  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_ Age \_\_\_\_\_

Date of Birth

Languages spoken \_\_\_\_\_ Interpreter  
required Yes / No

Does the child have a disability? Yes / No  
\_\_\_\_\_

Disability Type

Does the child attend school? Yes / No  
\_\_\_\_\_

School name?

### Persons living in the same household as the child

Name	Date of Birth / Age	Relationship to Child
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		

### Type of Abuse being Reported

Suspected: \_\_\_ Physical Abuse \_\_\_ Emotional Abuse \_\_\_ Sexual Abuse \_\_\_  
Neglect



**Are you aware of any protective factors and / or family / child strengths?**

**Yes** (detail below) / **No**

(eg. the presence in the home of a protective care giver; a child's ability to seek external help when they feel they are at risk)

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**Are you aware of any relevant previous health expectations? Yes** (detail below) / **No**

(eg. identify any previous presentations that may hold child protection concerns / reports in relation to the child)

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**Source of Information**

(eg. clinical presentation / assessment / observation / contact / advice)

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**Has the parent / carer been advised that this report has been made?**

**Yes** (detail below) / **No**

Comment:

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*Note: If you make a decision to inform the parent / carer / child that a report has been made, any reasonable expectation of confidentiality is lost.*

**Details of the person(s) allegedly responsible for the harm or risk of harm**

Name \_\_\_\_\_ Relationship to Child

\_\_\_\_\_

Address

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Telephone \_\_\_\_\_ Date of Birth / Age \_\_\_\_\_ Nationality \_\_\_\_\_

Employed by (if relevant) \_\_\_\_\_ Position \_\_\_\_\_

**Description of Harm or Risk of Harm**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Referral to a Child Protection Service**

Is the child a current client of a **health service** provider? Yes (detail below) / No / Unknown  
Name of service \_\_\_\_\_

Contact person \_\_\_\_\_ Telephone \_\_\_\_\_

Is the child a current client of a **protective service** provider? Yes (detail below) / No / Unknown  
Name of service \_\_\_\_\_

Contact person \_\_\_\_\_ Telephone \_\_\_\_\_

If not, have you made a **referral**? Yes (detail below) / No  
Name of service \_\_\_\_\_

Contact person \_\_\_\_\_ Telephone \_\_\_\_\_  
Date of referral \_\_\_\_\_

**Details of Reporting Professional**

Name \_\_\_\_\_ Telephone \_\_\_\_\_

Position \_\_\_\_\_ Employer \_\_\_\_\_

Signature \_\_\_\_\_  
\_\_\_\_\_

Date of Report

**Receiver of Report**

Name \_\_\_\_\_  
\_\_\_\_\_

Telephone

Position \_\_\_\_\_  
\_\_\_\_\_

Employer

Signature \_\_\_\_\_  
\_\_\_\_\_

Date of Report

**Action taken**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## Attachment 8: Signed code of Conduct and Police Check Register

No	Date	Name	Date Contract Started	Date Contract Ends	Code of Conduct (Date signed)	Police Check (Date obtained)
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						

## Attachment 9: Timeline for Child Protection Policy Implementation

Date	Activity	Achievement
November 2018	New TLMN Child Protection Policy approved by the Board and in Place	
March 2019	Child Protection Training provided to TLMN staff and volunteers	
Jan - June 2019	Partners informed of new Child Protection Policy and requirements	
July - Dec 2019	Child Protection Training provided to Partners	
December 2019	Partners have own policies updated and Risk assessments completed	
January 2020	Partners have Codes of Conduct signed and in place	
July 2020	Annual Review of Codes of Conduct, Risk Assessments and Training requirements	
July 2021	Annual Review of Codes of Conduct, Risk Assessments and Training requirements	
July 2022	Annual Review of Codes of Conduct, Risk Assessments and Training requirements	
July 2023	Annual Review of Codes of Conduct, Risk Assessments and Training requirements	
July 2024	Commence Child Protection Policy review	
January 2025	Updated version of TLMN Child Protection Policy approved by the Board and in Place	
Next 5 years	Repeat the Process	

## Attachment 10: Records of Consultation with TLMN on Policy

Date	Consultation / Discussion	Response / Result
16 July 2018	Philip Hamilton to TLMN Management: Opening discussion about policy reviews	
11 Aug. 2018	Draft TLMN CP Policy developed (in line with DFAT 2017 CP Policy).	
27 Aug. 2018	Draft TLMN CP Policy 2018 submitted to TLMN Programmes Unit for review.	
Oct. 2018	Draft TLMN CP Policy 2018 submitted to TLMN Board Governance Committee for review.	
Oct. 2018	CP Policy emailed to TLMN Board for approval	
08 Nov. 2018	TLMN CP Policy approved and adopted by TLMN Board.	

## Attachment 11: Child Protection Risk Assessment Template

Risk Factor	Typical impact if risk materialises	Risk likelihood	Risk Impact	Mitigation procedure	Overall Assessment	Actions planned to limit risk in coming year
TLMN						

## Attachment 12: Child Protection Risk Register

Risk Factor	Typical impact if risk materialises	Risk likelihood	Risk Impact	Mitigation procedure	Overall Assessment	Actions taken to limit risk in past year
<b>RISKS RELATED TO TLMN</b>						
Potential abuse of children during community fundraising sessions	Effect on child and family. Loss of reputation of staff and organization. Potential litigation	L	H	Child Protection Policy and Procedures in place. Reporting process for suspected abuse instances	H	New Revised Child Protection Policy in place. Informing & Training Partners ongoing
Potential abuse of children when staff do education sessions in schools	Effect on child and family. Loss of reputation of staff and organization. Potential litigation	L	H	Child Protection Policy and Procedures in place. Reporting process for suspected abuse instances	H	New Revised Child Protection Policy in place. Informing & Training Partners ongoing
Potential abuse of children when staff visit churches	Effect on child and family. Loss of reputation of staff and organization. Potential litigation	L	H	Child Protection Policy and Procedures in place. Reporting process for suspected abuse instances	H	New Revised Child Protection Policy in place. Informing & Training Partners

						ongoing
Potential abuse of children when staff visit homes of leprosy mission supporters	Effect on child and family. Loss of reputation of staff and organization. Potential litigation	L	H	Child Protection Policy and Procedures in place. Reporting process for suspected abuse instances	H	New Revised Child Protection Policy in place. Informing & Training Partners ongoing
<b>RISKS RELATED TO PARTNER ORGANISATIONS</b>						
<b>Risk Factor</b>	<b>Typical impact if risk materialises</b>	<b>Risk likelihood</b>	<b>Risk Impact</b>	<b>Mitigation procedure</b>	<b>Overall Assessment</b>	<b>Actions taken to limit risk in past year</b>
Potential abuse of children during assessment for leprosy skin patches	Effect on child and family. Loss of reputation of staff and organization. Potential litigation	M	H	Child Protection Policy and Procedures in place. Reporting process for suspected abuse instances	H	New Revised Child Protection Policy in place. Informing & Training Partners ongoing
Potential abuse of children during treatment for leprosy	Effect on child and family. Loss of reputation of staff and organization. Potential litigation	L	H	Child Protection Policy and Procedures in place. Reporting process for suspected abuse instances	H	New Revised Child Protection Policy in place. Informing & Training Partners ongoing



Potential abuse of children during prevention of disability and self-care sessions	Effect on child and family. Loss of reputation of staff and organization. Potential litigation	M	H	Child Protection Policy and Procedures in place. Reporting process for suspected abuse instances	H	New Revised Child Protection Policy in place. Informing & Training Partners ongoing
Potential abuse of children during community education sessions	Effect on child and family. Loss of reputation of staff and organization. Potential litigation	L	H	Child Protection Policy and Procedures in place. Reporting process for suspected abuse instances	H	New Revised Child Protection Policy in place. Informing & Training Partners ongoing
Potential abuse of children during self-help group meetings and activities	Effect on child and family. Loss of reputation of staff and organization. Potential litigation	L	H	Child Protection Policy and Procedures in place. Reporting process for suspected abuse instances	H	New Revised Child Protection Policy in place. Informing & Training Partners ongoing
Potential abuse of children when staff visit and stay in communities	Effect on child and family. Loss of reputation of staff and organization. Potential litigation	M	H	Child Protection Policy and Procedures in place. Reporting process for suspected abuse instances	H	New Revised Child Protection Policy in place. Informing & Training Partners ongoing
Potential abuse of children when staff do education sessions in schools	Effect on child and family. Loss of reputation of staff and organization. Potential litigation	L	H	Child Protection Policy and Procedures in place. Reporting process for suspected abuse instances	H	New Revised Child Protection Policy in place. Informing & Training Partners ongoing

Potential abuse of children when staff visit homes of people affected by leprosy and disability.	Effect on child and family. Loss of reputation of staff and organization. Potential litigation	L	H	Child Protection Policy and Procedures in place. Reporting process for suspected abuse instances	H	New Revised Child Protection Policy in place. Informing & Training Partners ongoing
<b>Risk Factor</b>	<b>Typical impact if risk materialises</b>	<b>Risk likelihood</b>	<b>Risk Impact</b>	<b>Mitigation procedure</b>	<b>Overall Assessment</b>	<b>Actions planned to limit risk in coming year</b>

## Attachment 13: Guidelines for Child Protection Training

Training for TLMN staff and partners in Child Protection practices will cover the following topics:

- Introduction to the UN Convention on the Rights of the Child
- Specific local legislation around the care of children (adjusted according to the state or country where the training is delivered)
- Roles and responsibilities of staff, partners, contractors, volunteers
- What is physical abuse, sexual abuse, emotional abuse, neglect and exploitation
- Why they happen
- What is the impact on children
- Indicators of abuse
- When to report abuse
- Reporting process
- Caring for children who have been abused
- Avoiding allegations – protective behaviours
- Ensuring children know their rights

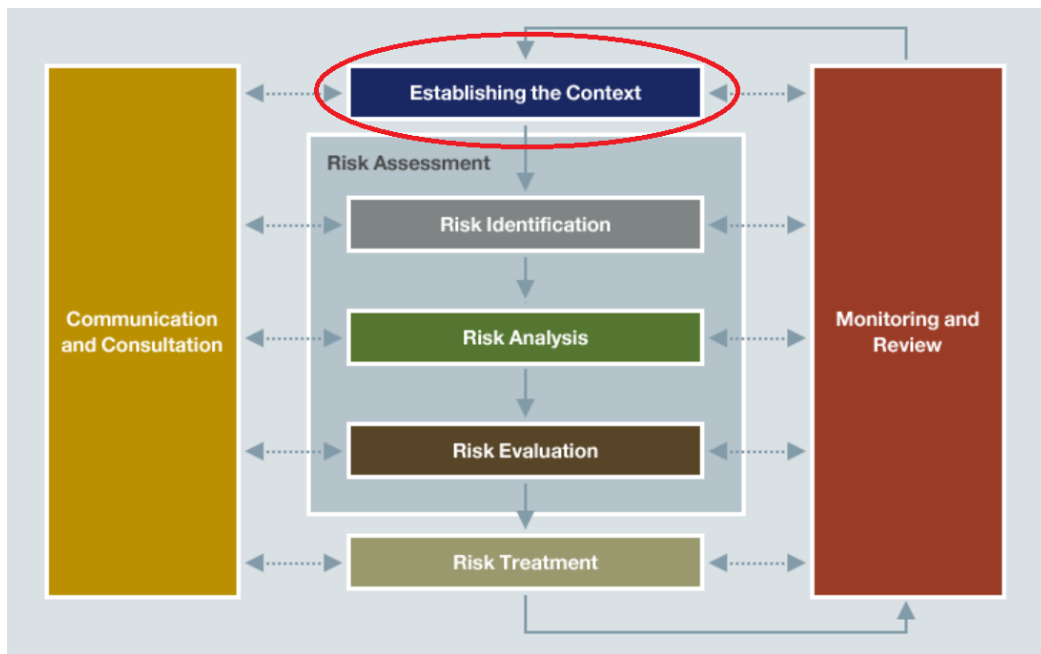
## Attachment 14: DFAT Guidance notes on Establishing Child Protection Risk Context

### Guidance Note Establishing Child Protection Risk Context DFAT Child Protection Policy

#### September 2016

This guide will assist DFAT staff and partners undertaking activities funded by DFAT (implementing partners) in establishing the **child protection risk context** to help determine whether a full child protection risk assessment is required. This guidance supports the DFAT Child Protection Policy 2013 (CPP) and is consistent with the DFAT approach to risk management.

Establishing the context of risk is the first step in the risk management process and is circled in the diagram below.<sup>5</sup> Following the steps outlined in this guide will determine whether a full child protection risk assessment needs to be undertaken.



Child protection risks need to be assessed as part of standard risk management processes at design, implementation, monitoring and evaluation – and managed throughout the lifecycle of an activity.

<sup>5</sup> The Risk Management Process - International Standard on Risk Management (ISO 31000:2009)

There are common **child protection risk context** areas that DFAT staff and implementing partners can review to determine whether a more detailed child protection risk assessment must be undertaken. These include the likely risk level of the partner organisation and the nature of contact between staff and children that will take place under the activity.

There are three steps outlined in this guide that are used to establish the **child protection risk context**. Once you have completed the three steps you can establish the overall potential **child protection risk context** and determine whether a full child protection risk assessment is required.

Risk levels included in this document are modelled on the DFAT Risk Matrix and follow the principles of the [International Standard on Risk Management \(AS/NZ 31000:2009\)](#).

**‘High’ Risk Activities**

Activities can be ‘high’ risk for a number of reasons. This can be due their nature, the organisation involved or a combination of both. Even though DFAT may be engaging in a low risk activity with an organisation, if that organisation is deemed a ‘high’ risk, then a risk assessment must be conducted before engagement and risk monitoring conducted throughout the engagement.

Establishing Child Protection Risk Context	
Step 1	Does the activity involve working with children or contact with children? This step will guide you through identifying the level of involvement with children. <i>If the activity is determined to be ‘working with children’ then a full child protection risk assessment is required</i>
Step 2	Is the organisation child-focused and what child protection controls <sup>6</sup> are currently in place?
Step 3	Determine the Child Protection Risk Context
<i>Note: All steps <u>must</u> be undertaken. It is not enough to identify an activity as low risk.</i>	

<sup>6</sup> Child protection controls for example can be, organisations undertaking child safe recruitment practices or ensuring their staff sign a child protection code of conduct. Controls are applied to limit the likelihood of a risk taking place.

**Step 1: Does the activity involve working with children or contact with children?**

There are two parts to this step:

Part A – Determine the activity level of working with or contact with children

Part B – Activity Inherent Risk

Use the definitions at the end of the document to assist with answering Part A and B

**Step 1**

**Part A - What is the level of working with or contact with children at the activity level?**

Complete the worksheet by adding a Yes/No response.

<b>1. Contact with Children - Assessment (No = nil contact)</b>		
<b>Inherent risk</b>	Personnel will be deployed in-country?	
	Personnel will be working in a remote and/or rural location?	
<b>Degree of Isolation</b>	Involves being alone with children? (not frequently enough to be working with children)	
	Involves activities that are away from organisation location	
	Involves meeting one-on-one with children? (not frequently enough to be working with children)	
	Involves unpredictable or remote settings?	
<b>Online contact or access to personal details</b>	Involves direct one-on-one or group access to children online?	
	Involves supervising child-to-child online contact?	
	Involves online access to a child's or children's personal and/or confidential information?	
	Inadequate/missing safe options for children to report unwanted attention or inappropriate behaviour by others?	
	Involves educating children and supporting adults on cyber safety?	
<b>2. Working with Children - Assessment</b>		
<b>Vulnerability of child/children</b>	Engages with children whose true or cognitive age impacts on their ability to protect themselves?	
	Engages with children who have challenges that contribute to their vulnerability? (e.g. psychological, situational)	
	Engages with children who do not have many support systems?	
<b>Degree of physical contact</b>	Involves demonstrating a skill to children?	
	Position involves need for physical contact/touching children?	
	Involves providing a personal service? (e.g. washing, dressing, toileting)	

<b>Degree of monopoly</b>	Monopoly on provision of goods and/or services <ul style="list-style-type: none"> <li>• Medical?</li> <li>• Food distribution?</li> <li>• Career training (sports/musical)?</li> </ul>	
<b>Degree of supervision</b>	Involves personnel having unsupervised contact with children?	
	Activities/engagement with children is not observed or monitored?	
	Insufficient number of trained staff to supervise activities/engagement with children?	
<b>Degree of trust</b>	Involves developing close, personal, long term relationships with children?	
	Involves transporting youth?	
	Involves one or more of the following: One-on-one supervision, overnight supervision, out of town activities, advising or offering guidance to youth or spending extended periods of time with youth e.g. camps?	
	Contributes to important decisions regarding the future of children?	
<b>Access to Property</b>	Has access to personal/confidential information?	
	Adult has a perceived or actual level of authority? (from child perspective)	
<b>Skills and knowledge required</b>	Requires specific skills, knowledge, qualifications or service eligibility requirements to undertake a child related position?	
<b>Child labour</b>	Possibility that activity will lead to the employment of children?	
	Possibility that activity will lead to the removal of children from school?	
	Possibility that activity will lead to children being employed in hazardous work?	
<b>Vulnerability of parent/carer</b>	Engages with parents whose true or cognitive age impacts on their ability to protect their children?	
	Engages with parents who have challenges that contribute to their ability to provide care? (e.g. psychological, situational)	
	Engages with parents who do not have many support systems?	
<b>Vulnerability can include:</b>	Physical and mental disabilities, homelessness, child sex workers or parents who are sex workers, children and families impacted by disasters, displaced, migrants, refugees and asylum seekers, children in contact with the law, children that have been subject to trafficking, orphans, unaccompanied minors and the very young?	

**Step 1**  
**Part B – Activity Inherent Risk**

Based on your responses in Part 1, identify the inherent risk of the activity using the table below. Activity Risk is the level of potential risks to children due to the nature of the activity (working with children) or the design of the activity (design of the activity introduces risks to children).

<b>LOW</b>	<b>No contact</b>	<input type="checkbox"/>	The activity does not involve any individuals working in-country (Nil Contact) (you answered No to all questions in Step 1 Part A)
<b>MODERATE</b>	<b>Contact with Children</b>	<input type="checkbox"/>	The activity involves or may involve contact with children (working in-country, remote or rural area) (you answered Yes to <u>any</u> questions in 'Contact with Children - Assessment' but 'No' for all questions in 'Working with Children - Assessment')
<b>HIGH</b>	<b>Working with Children</b>	<input type="checkbox"/>	The activity involves working with children (you answered YES to <u>any</u> questions under 'Working with Children - Assessment')

**Note:** If an activity is determined to be 'working with children' then a full child protection risk assessment is required regardless of the organisational context outcome.

**Step 2: Is the organisation child-focused and what child protection controls are in place?**

There are two parts to this step:  
 Part A – Assessment of Organisation’s Focus on Children and strength of child protection systems in place  
 Part B – Organisation Inherent Risk

**Step 2**  
**Part A – Assessment of Organisation’s Focus on Children and strength of systems**

Complete the worksheet below and add a Yes/No response against each question under 'Systems and Controls' and 'Focus'.

<b>Organisation Profile</b>		
<b>Size of organisation</b>	Number of staff employed by the organisation either paid or unpaid	
<b>Types of Personnel</b>	Contractors	
	Permanent staff	
	Volunteers	
	Sponsors	
	Other	



<b>Sites</b>	Number of sites operated	
	Proximity of sites to central management	
	Sites are located in unpredictable or remote / rural location	
<b>Systems and Controls</b> - Strength of systems and controls scaled by number of 'yes' responses. Use the scale 0 Yes answers = poor systems, 8 Yes answers = strong systems		
<b>Child protection policy and procedures</b> <sup>7</sup>	Child Protection Policy in place?	
	Recruitment practices, screening completed for all staff, before commencing work?	
	Notifications/Incident reporting procedures in place?	
	Staff receive child protection training?	
	Boundaries for appropriate behaviour/code of conduct are implemented?	
	Feedback on staff performance recorded?	
	Record keeping procedures are in place (meetings, activities, incidents, reports, logs, record of complaints)?	
	Organisation checks if third party service providers are child safe?	

<b>Focus</b> - A child-focused organisation is an organisation that answers 'yes' to any of the questions below.		
<b>Types of activities</b>	Does the organisation across all of its operations provide any direct activities/services for children?	
	Does the organisation provide any humanitarian relief?	
<b>Business model/services provided by organisation</b> <sup>8</sup>	Organisation provides Residential/Orphanage/Shelter services?	
	Organisation uses a child sponsorship model?	
	Organisation allows sponsors to visit with children?	
	Organisation is part of a 'voluntourism' <sup>9</sup> program?	
	Organisation requires technical experience/expertise to implement child related services?	
	Organisation uses children and/or images of children as a 'product' for fundraising activities?	

<sup>7</sup> A no response to all or most questions would indicate a high-risk organisation due to poor systems. A yes response to all or most questions would indicate strong systems

<sup>8</sup> A yes would indicate that an organisation would require a higher degree of child safeguarding than the minimum detailed in the DFAT Child Protection Policy.

<sup>9</sup> Voluntourism is "Volunteer travel, volunteer vacations or voluntourism is travel which includes volunteering for a charitable cause" Voluntourism is a business model that has been shown to be very high risk to children.

**Step 2  
Part B – Organisation Inherent Risk**

Organisational risk is the level of potential risk posed by the organisation due to their ability to address child protection risks through their policies, procedures and systems and the type of work the organisation engages in (e.g. if they are a child focussed organisation, their risks will be higher).

<b>LOW</b>	<b>NO FOCUS</b>	<input type="checkbox"/>	Organisation is not a child-focused organisation ( you answered No to all questions in Step 2 – Focus)
<b>MODERATE</b>	<b>FOCUS &amp; STRONG SYSTEMS</b>	<input type="checkbox"/>	Organisation is a child-focused organisation and has good child protection systems in place (You answered Yes to any question in Step 2 Focus and had a majority of Yes answers to the questions under systems and controls)
<b>HIGH</b>	<b>FOCUS &amp; POOR SYSTEMS</b>	<input type="checkbox"/>	Organisation is a child-focused organisation and has poor or nil child protection systems in place (You answered Yes to any question in Step 2 Focus and had a majority of No answers to the questions under systems and controls)

**Step 3: Establish the overall potential child protection risk context and whether a full child protection risk assessment is required**

Once you've completed steps 1 and 2 you can establish the overall risk context by placing the results of each activity in the appropriate field below:

<b>Organisation level of contact with children and systems in place</b> (organisation inherent risk from Step 2)	<b>Activity Level of Contact with Children</b> (activity inherent risk from Step 1)		
	<b>NIL (LOW)</b>	<b>CONTACT (MODERATE)</b>	<b>WORKING (HIGH)</b>
<b>NO FOCUS (LOW)</b>	<input type="checkbox"/> No further assessment required	<input type="checkbox"/> No further assessment required, monitor for changes	<input type="checkbox"/> Full assessment required
<b>FOCUS &amp; STRONG SYSTEMS (MODERATE)</b>	<input type="checkbox"/> No further assessment required, monitor for changes	<input type="checkbox"/> No further assessment required, monitor for changes	<input type="checkbox"/> Full assessment required
<b>FOCUS &amp; POOR SYSTEMS (HIGH)</b>	<input type="checkbox"/> Full assessment required	<input type="checkbox"/> Full assessment required	<input type="checkbox"/> Full assessment required

**If the matrix indicates a full child protection risk assessment is required**

Implementing Partners:

- conduct a full assessment of the child protection risks within the organisation and activity using the organisation’s internal risk processes and documentation using their own risk management framework.
- show evidence to DFAT that the assessment has been completed and documented in accordance with its internal risk processes.

DFAT Staff:

- conduct a full assessment of the child protection risks at design, tender, contract negotiation, implementation, monitoring and evaluation for the lifecycle of the activity, in accordance with the *Aid Programming Guide* and the *Risk Management for Aid Investments Better Practice Guide*.

**If the matrix indicates a requirement for monitoring of child protection risks**, it is recommended that the risk be included in the relevant Investment risk register and monitored accordingly.

Identify and record who completed the steps above and when full assessment (if required) will be completed.

**1.1. Definitions**

Definition	
<b>Working With children</b>	<p>Working with children means being engaged in an activity with a child where the contact would reasonably be expected as a normal part of the activity and the contact is not incidental to the activity. Working includes volunteering or other unpaid work.</p> <p><i>The risks of child exploitation and abuse generally increase with the frequency of contact, meaning that working with children is a higher risk than contact with children.</i></p>
<b>Examples</b>	<p>Activities or services for children:</p> <ul style="list-style-type: none"> <li>• Disability service: school for the deaf</li> <li>• Cultural youth exchange</li> <li>• Residential care</li> <li>• Child protection services</li> <li>• Justice facilities for children</li> <li>• Childcare services</li> <li>• Child education services: Children in sports</li> <li>• Child accommodation services</li> <li>• Health services: Access to Sexual &amp; Reproductive Health</li> <li>• Counselling and support services for children</li> <li>• Emergency response: Humanitarian assistance to children and families</li> </ul>
<b>Contact With children</b>	<p>Contact with children means being engaged in an activity or in a position that involves or may involve contact with children, either under the position description or due to the nature of the work environment. This means physical contact, face-to-face contact, oral communication, written communication or electronic communication.</p> <p><i>Contact covers contact with children in the community not associated with the work being performed.</i></p>

**Examples**

- Any in-country work, in particular working in remote/rural locations
  - Oral and written communication (including electronic communication) relating to a child
  - Visiting premises e.g. schools, health or residential facilities, that provide services to children
  - Any community consultation (data collection, surveying, training)
  - Women and Gender focussed activities
  - Health Sector Programs
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