



POLICY

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# CHILD & VULNERABLE PEOPLE PROTECTION POLICY

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*Change begins with Education*

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## **CHILD & VULNERABLE PEOPLE PROTECTION POLICY**

### **1. INTRODUCTION AND PREAMBLE**

SeeBeyondBorders is a not-for-profit organisation that is registered as a charity in Australia and the UK, and operates as a registered international non-government organisation in Cambodia. Our vision is to provide Cambodian children with access to quality teaching and learning at school.

SeeBeyondBorders' staff, volunteers and program participants work in schools with teachers, children and young people, therefore it is imperative that the organisation has a clearly defined child and vulnerable people protection policy and effective procedures that govern all three SeeBeyondBorders operations.

### **2. PURPOSE OF THE POLICY**

SeeBeyondBorders is committed to the protection and safeguarding of all children and vulnerable people from all forms of harm and abuse and this policy sets how, in the context of our work, we will endeavour to reduce the risk of such harm and abuse occurring and deal with specific incidents where they are identified. Given our endeavours to improve the lives of the communities with whom we work, the safety and wellbeing of the children and vulnerable people coming into contact with SeeBeyondBorders' personnel and programs is of paramount concern.

SeeBeyondBorders recognises the definition of safeguarding to encompass protecting children from maltreatment, preventing impairment of children's health or development, and ensuring children grow up in safe circumstances and these values are the basis for this Policy. Our activities related to child protection, as outlined in this Policy, aim to protect both children and vulnerable people where we identify that they are suffering, or are at risk of suffering, significant harm.

SeeBeyondBorders recognises that risk of abuse to children and vulnerable people exists from the staff and believes a key mitigating factor is the recruitment process for all personnel. The policy covers recruitment and screening of SeeBeyondBorders' Personnel, child and vulnerable people protection education and training, risk management, code of conduct, photography and filming of children and vulnerable people, and policy management. We also support the rights and welfare of SeeBeyondBorders' personnel, encourage their active involvement in ensuring safe and respectful environments whilst engaged in any SeeBeyondBorders activities so minimising risks for themselves and other participants.

### **3. SCOPE OF THIS POLICY**

This policy applies to all SeeBeyondBorders personnel, defined as:

- board members and trustees
- current staff and volunteers
- external consultants and contractors (paid or voluntary)
- contracted staff or personnel of contracted organisation and services
- project team participants

Any other person working for or on behalf of SeeBeyondBorders.

This policy also applies to other individuals and third parties who through their association with SeeBeyondBorders may visit our project activities (i.e. donors, Australian and UK Partner Organisations, service providers) although the management process for these groups may differ in certain aspects given their involvement.

#### **4. GUIDING PRINCIPLES**

The SeeBeyondBorders Child & Vulnerable Beneficiary Protection Policy has five guiding principles:

- **Zero tolerance of abuse and exploitation:**  
Abuse and anything else that causes harm to children, young people and vulnerable beneficiaries is not tolerated by SeeBeyondBorders, nor is possession of or access to child images or films of children being sexually abused or exploited.
- **Recognition of children's interests:**  
SeeBeyondBorders is committed to upholding the rights of children and recognises that some children, such as children with disabilities and children living in areas impacted by disasters (natural or conflict based), are particularly vulnerable.
- **Shared responsibility for child and vulnerable beneficiary protection:**  
To effectively manage risks to children and vulnerable beneficiaries, SeeBeyondBorders requires the active support and cooperation of all its Personnel. SeeBeyondBorders Personnel must comply with this policy and will be held accountable for complying with it.
- **Use of a risk management approach:**  
Careful management can reduce the incidence of child and vulnerable beneficiary abuse associated with aid activities. This policy introduces strategies for minimising a range of recognised risks to children and vulnerable beneficiaries.
- **Duty of Care:**  
SeeBeyondBorders recognises its Duty of Care responsibilities and takes all reasonable steps to safeguard the children and vulnerable beneficiaries in its programs.

#### **5. DEFINITIONS**

##### **Child and young person**

In accordance with the United Nations Convention on the Rights of the Child (1989), SeeBeyondBorders defines a child or young person as any person below the age of 18 years, regardless of local laws or other definitions.

##### **Abuse**

Abuse includes physical abuse, emotional abuse, neglect, exploitation or sexual abuse.

Both boys and girls, women and men can be the victims of abuse, and abuse can be inflicted on a child or other vulnerable person by men, women and other children.

- *Physical abuse* occurs when a person purposefully injures, or threatens to injure, a child or vulnerable beneficiary. This may take the form of slapping, hitting, beating, punching, shaking, kicking, burning, shoving or grabbing.

- *Emotional or psychological abuse* occurs when a child or vulnerable person is repeatedly rejected and/or intimidated through verbal and/or non-verbal means. This may involve insults, taunts, threats, isolation and ridicule including using gestures as well as language.
- *Sexual abuse* occurs when an adult, more powerful child, or adolescent, uses his or her power to involve a child or vulnerable person in, or expose them to sexual activity. That coercive power can be physical, verbal or emotional. Sexual activity includes a wide range of behaviour from inappropriate touching or fondling, grooming behaviour, exposing a child to pornography, through to having sex with a child.
- *Neglect* is the continual and deliberate failure to provide a child or vulnerable person with the conditions essential for their physical and emotional development and well-being, or failure to address issues around health and illness.
- *Ill-treatment* is disciplining or correcting a child or vulnerable person in an unreasonable and seriously inappropriate or improper manner; making excessive and/or degrading demands; hostile use of force; and/or a pattern of hostile or unreasonable and seriously inappropriate degrading comments or behaviour.

### **Protection**

An activity or initiative designed to protect children/vulnerable people from any form of harm, particularly arising from abuse. Child Protection is an activity that contributes to successful safeguarding.

### **Duty of care**

Duty of care is a common law concept that refers to the responsibility of the organisation to provide children and vulnerable beneficiaries who are participating in SeeBeyondBorders' programs with an adequate level of protection against harm. It is the duty of the organisation to ensure that there is no negligence on its part and to protect children and vulnerable beneficiaries from all reasonably foreseeable risks of injury.

### **Safeguarding**

Safeguarding is a broader term than Child Protection. It is the process of protecting children and vulnerable beneficiaries from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables beneficiaries to have optimum life chances.

Note that for the purposes of this policy, "Safeguarding" refers to the action taken by SeeBeyondBorders to prevent harm or in the worst case to take action where harm has been committed by a member of SeeBeyondBorders Personnel. It does not differ from the principals included in the Safeguarding Policy other than to the extent that the Child and Vulnerable People Protection Policy (this one) extends the requirement to take action beyond the follow up of harm perpetrated by SeeBeyondBorders Personnel to a broader public. Therefore, the Child and Vulnerable People Protection Policy incorporates all aspects of Safeguarding as referred to in the Safeguarding policy.

### **Vulnerable Person**

This can be defined as a person who may be vulnerable to abuse because of their age, health, physical or mental abilities, or economic circumstances and dependencies for their basic needs. This is not limited to children, but could also apply to adults who participate in SeeBeyondBorders' programs.

## **6. PERSONNEL RECRUITMENT, SCREENING AND ORIENTATION**

Recruitment and screening of Personnel and associates reflects SeeBeyondBorders' commitment to protect children and vulnerable people by ensuring appropriate, relevant checks and procedures are in place to screen out anyone who may be unsuitable to be in contact with children and vulnerable people, and attract the safest people who share SeeBeyondBorders' values and commitment to protect these groups.

SeeBeyondBorders has a robust recruitment and screening process for all personnel (as defined above). SeeBeyondBorders basic commitments in our recruitment screening processes are:

- Criminal record checks before engagement; statutory declarations of local legal equivalence where criminal record checks are unavailable or unreliable
- Minimum of two verbal referee checks to include a question on whether any incidents relating to the protection of a child or a vulnerable person had come to their attention.
- Behavioural-based interview questions relating to contact with children

This process is more fully documented in our recruitment and selection procedures which is saved in our internal shared drive.

No persons under 18 years of age will be employed in any capacity. Should any person be introduced by SeeBeyondBorders in areas that could be considered to represent the workplace, for example by being a project team member, she or he will always be accompanied by an adult who will be responsible for her or his behaviour.

## **7. EDUCATION AND ONGOING TRAINING**

Education and training to promote awareness and understanding about child protection and the treatment of other vulnerable beneficiaries in the context of SeeBeyondBorders' responsibilities is provided to all Personnel during their induction and orientation to the organisation and its programs, even where that is in the context of a one off visit by a donor or other visitor (see Appendix B - Volunteer, Donor and Other Visit Programs – assurance processes). Training incorporates familiarisation with SeeBeyondBorders Child and Vulnerable People Protection Policy, including the recording and reporting procedures, and Personnel are required to sign a Child and Vulnerable People Protection Agreement declaration. Refresher training sessions for employees will be provided annually or whenever changes are made to this SeeBeyondBorders' policy or recording and reporting procedures.

### **CHILD & VULNERABLE BENEFICARY PROTECTION RISK MANAGEMENT**

SeeBeyondBorders acknowledges that abuse is a risk faced by all organisations that work with children and vulnerable people. The risk of abuse to vulnerable people, is particularly prevalent when organisations operate in rural, remote and poor areas. SeeBeyondBorders identifies possible risks at a program and project level through means of a risk assessment. This risk assessment identifies: adverse events or occurrences that could occur (i.e. areas of risk); the probability of that risk occurring; the level of seriousness of the outcome if the particular event does happen; and what preventative and protective measures that are in place. Risk management and assessment procedures are included

as an area that is part of the overall project management cycle and addressed on an ongoing reflective basis.

## **8. RESPONDING TO DISCLOSURE BY A CHILD / YOUNG PERSON**

SeeBeyondBorders will treat all concerns raised seriously and ensure that all parties will be treated fairly and without bias or judgement. All reports will be handled professionally, confidentially and expediently.

All reports made in good faith will be viewed as being made in the best interests of the child / young person regardless of the outcomes of any investigation. SeeBeyondBorders will ensure that the interests of anyone reporting child abuse in good faith are protected as covered in our Whistle-blowing Policy. The rights and welfare of the child / young person is of prime importance. Every effort will be made to protect the rights and safety of the child throughout any investigation.

When a child / young person discloses that he or she has been abused, it is important to keep in mind:

- They may be feeling scared, guilty, ashamed, angry and powerless. You, in turn, may feel a sense of outrage, disgust, sadness, anger and sometimes disbelief.
- If a child discloses abuse, whatever the outcome, the child must be taken seriously.
- It is important for you to remain calm and in control and to reassure the child / young person that something will be done to keep him or her safe.
- When a child or young person's discloses they are being harmed you can show your care and concern for the child / young person by:
  - Listening carefully
  - Telling the child / young person you believe him or her
  - Telling the child / young person it is not their fault and he / she is not responsible for the abuse
  - Telling the child / young person you are pleased he / she told you
- You will not be helping the child / young person if you:
  - Make promises you cannot keep, such as promising that you will not tell anyone
  - Push the child / young person into giving details of the abuse. Your role is to listen to what the child / young person wants to tell you and not to conduct an investigation (beware of asking any leading questions as this may prejudice any subsequent investigation)
  - Indiscriminately discuss the circumstances of the child / young person with others not directly involved.
- If a report is made to you as a staff member / volunteer, follow the SeeBeyondBorders reporting processes, support, and response guidance in Appendix C.

## **9. PHOTOGRAPHY OR FILMING INVOLVING CHILDREN AND/OR VULNERABLE PEOPLE AND USE OF THESE IMAGES**

This process is fully documented in SeeBeyondBorders' Images Policy and Communications Policy and is referred to below in Appendix A: Code of Conduct for Working with Children and Venerable People.

## 10. WORKING WITH PARTNERS

With respect to arrangements with Partners as defined in our Working With Partners Policy and also with other definitions of partner that embrace any activity conducted jointly for or on behalf of SeeBeyondBorders, the following principles relating to the application of the Child & Vulnerable People Protection Policy and in particular the principles relating to the protection and safeguarding of children and vulnerable people, apply:

- For clarity, wherever SeeBeyondBorders establishes a formal agreement with another individual, contractor, or organisation to work as a partner, including with Partners as governed by our Working With Partners Policy, in implementing its programs or undertaking a project involving children and or vulnerable people, it will ensure that the relevant partner has processes and procedures that will provide at least a similar level of protection of children and vulnerable people.
- Where any partner does not have the requisite policy and procedures in place, SeeBeyondBorders may choose either to not work with them or to assist them to build their capacity and introduce the necessary protection mechanisms before undertaking any work.

## 11. POLICY MANAGEMENT

This Policy has been approved by the Australian Board and the Trustees of SeeBeyondBorders' other entities as noted below.

Amendments and or developments will be recommended to the Board from time to time as deemed appropriate by senior management. Formal reviews will take place before the expiry of three years from the anniversary date of approval by the Board. Recommendations for minor changes can be approved by the CEO before the expiry of three years, and recommendations for changes to the background or policy in practice can be approved by the relevant Sub-Committee.

Doc ref	Doc type	Approved by Australian Board Date	Minute ref.	Approved by UK Trustees Date	Minute ref	Approved by Irish Board Date	Minute ref
	Policy Review	Board 21 Aug 2018	?	11 Oct 2018	Minutes: 11/10/18	N/A	N/A
	Policy Update	Board 12 Nov 2019	?			N/A	N/A
CVPPP/06/20 20/1.0	Policy Update	Board 29.6.20	Agenda item 8	21.7.20	Agenda item 5		

## APPENDIX A: CODE OF CONDUCT FOR WORKING WITH CHILDREN AND VULNERABLE PEOPLE

SeeBeyondBorders views child and vulnerable people protection as a shared responsibility. To effectively manage risks to children and other vulnerable people, SeeBeyondBorders requires the active support and cooperation of all SeeBeyondBorders Personnel. SeeBeyondBorders also encourages awareness of child protection issues and vulnerability in communities among our partner organisations in Cambodia, Australia and the UK.

It is a requirement that SeeBeyondBorders Personnel must 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 their association with SeeBeyondBorders.

SeeBeyondBorders endeavours wherever possible to reduce the risk of inappropriate behaviour by SeeBeyondBorders Personnel. Accordingly, SeeBeyondBorders will exercise its right to dismiss or withdraw SeeBeyondBorders Personnel when it considers that the person poses an unacceptable risk to the safety or well-being of children or vulnerable people. If deemed appropriate, SeeBeyondBorders may suspend Personnel or transfer them to other duties as a temporary measure while an investigation is conducted.

### Our responsibilities

*SeeBeyondBorders' Personnel and partners will:*

- Treat every individual with dignity and respect regardless of differences of ethnicity, religion, age, ability, gender, sexual orientation, race, colour, language, political or other opinion, national or social origin, property, disability, birth status, and economic circumstances.
- Conduct themselves in a manner consistent with their position as a positive role model to children and communities, and as a representative of SeeBeyondBorders.
- Immediately raise and report any concerns for the safety or wellbeing of a child with the SeeBeyondBorders' Child Protection & Inclusion Officer/ Safeguarding Focal Point Officer, the Monitoring and Compliance Manager, Country Manager or CEO, in accordance with the SeeBeyondBorders' Code of Conduct and reporting procedures.
- Be visible when working with children and other vulnerable beneficiaries.
- Avoid being alone with children or vulnerable beneficiaries and wherever possible, ensure that other adults are present when working in the proximity of children.
- Comply with all relevant Australian/UK and local legislation, including labour laws in relation to child labour.

*SeeBeyondBorders' Personnel will not:*

- Engage in any behaviour that is intended to shame, humiliate, belittle or degrade people or groups of people
- Use language, make suggestions, offer advice or engage in any behaviour that is inappropriate, discriminatory, offensive, harassing, sexually provocative, demeaning, culturally inappropriate or abusive
- Supply alcohol and drugs to a child or other vulnerable beneficiary as this is inappropriate behaviour

- Show differential treatment or favouritism to a child or other vulnerable beneficiary, including offering gifts to children
- Do things of a personal nature that a child or other vulnerable beneficiary can do for him/herself, such as assistance with toileting or changing clothes.
- Take children/vulnerable people to their own accommodation unless they are at immediate risk of injury or in physical danger.
- Sleep in the same room or bed as a child/vulnerable beneficiary unless absolutely necessary, in which case, the project team leader's permission must be obtained, and another adult must be present wherever possible.
- Physically punish or discipline any child or vulnerable beneficiary.
- Engage any child, children, or vulnerable beneficiaries in any form of sexual activity or acts, including paying for sexual activity or acts.
- Act in ways that may be abusive or place a child/vulnerable beneficiary at risk of abuse or harm.
- Behave physically in a manner that is inappropriate or sexually provocative towards a child/vulnerable beneficiary.
- Condone, or participate in, behaviour towards children/vulnerable beneficiaries that is illegal, unsafe or abusive.
- Act in a way that shows unfair differential treatment, or favour towards particular children/vulnerable beneficiaries to the exclusion of others.
- Record or publish any child's or vulnerable person's name or any address details with photographs.
- Hold, kiss, cuddle or touch a child/vulnerable beneficiary in an inappropriate, unnecessary or culturally insensitive way. Touching should only be in response to the need of the individual; be only with the individual's permission (except in an emergency situation); avoid the breasts, buttocks and groin; and be open and non-secretive.
- Use any computers, mobile phones, or video and digital cameras inappropriately, or access images or films of children being sexually abused or exploited through any medium.
- Hire children/vulnerable beneficiaries 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.

*When photographing or filming a child or using children's images for work-related purposes, SeeBeyondBorders will:*

- Obtain informed and documented consent of the child and his / her parents or guardians before photography / filming and provide an explanation on how the photograph / 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.
- Images are honest representations of the context and 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
- Take care to ensure the local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child.

*Responsibilities where inappropriate behaviour is witnessed*

- Where SeeBeyondBorders Personnel witness another person committing an act that breaches this policy such that it would fall within the definition of Abuse as set out in Section 5 'Definitions', it is the responsibility of that person to report what they have witnessed in the first instance to the Child Protection & Inclusion Officer, or if not appropriate or possible, to one of: the Monitoring and Compliance Manager; Country Manager; Country Director; or nominated member of the leadership team WHETHER OR NOT THE PERPETRATOR IS CONNECTED WITH SEEBEYONDBORDERS. The details of what and how to report are included in APPENDIX C. They may then be required to assist with the ensuing investigation.

## APPENDIX B: Volunteer, Donor and Other Visit Programs – assurance processes

SeeBeyondBorders recognises the need to implement specific guidelines to manage risks relating to the protection of children and vulnerable persons from its volunteer, donors and other visit programs. These guidelines include:

<b>Type of visitor</b>	<b>Description of visit</b>	<b>Safeguards and Guidelines</b>
<p><i>Teacher Volunteers</i></p>	<p>In January every year we invite qualified teachers from Australia, the UK and Ireland to join us in Cambodia for a two week volunteering experience.</p>	<p>All visits are arranged in advance through our office and volunteer teachers (on occasions accompanied by family members) are screened through our processes, including (but not limited to) reference checks, Police or Working with Children checks. Where a family member may not have a Police check, they complete the Child and Vulnerable People Protection Self Declaration form (as appropriate). All visitors are expected to read and sign the declaration to commit to abiding by the Safeguarding Policy, Child and Vulnerable People Protection Policy and the Code of Conduct.</p> <p>All volunteer teachers will receive a child protection and safeguarding briefing that includes clear child protection and behavioural guidelines.</p> <p>All teacher visits to schools are accompanied by an appropriate number of members of the SeeBeyondBorders Team.</p> <p>The exchange of mailing addresses and contact details (including online forums) is not permitted at any time.</p> <p>Other Considerations:</p> <p>Visitors will be accounted for and removed from the site at the conclusion of any visit once the activity is complete. It hardly needs to be said that visitors will not be permitted to stay with a child in their home / centre or community overnight.</p> <p>Where teacher visitors go against policies we will accompany them to the airport and arrange for them to return to their country of origin, going so far as reporting them to the authorities as appropriate. Needless to say, under such circumstances SeeBeyondBorders will bring the relationship with SeeBeyondBorders to a close.</p>

<b>Type of visitor</b>	<b>Description of visit</b>	<b>Safeguards and Guidelines</b>
<i>Support Staff Volunteers</i>	SeeBeyondBorders offers short term volunteer opportunities in the Cambodian office for up to six months and in limited situations longer for individuals with specific skills.	<p>All volunteer contracts are arranged in advance through our office and volunteers are screened through our HR processes, including (but not limited to) Police or Working with Children checks. Volunteers are expected to read and sign the declaration to undertake to abide by all SeeBeyondBorders' Policies including the Safeguarding Policy, Child and Vulnerable People Protection Policy and the Code of Conduct.</p> <p>Individuals will participate in child safeguarding training as part of their induction with SeeBeyondBorders and prior to any visit to schools.</p> <p>The exchange of mailing addresses and contact details (including online forums) is not permitted at any time.</p> <p>Other considerations are the same as for Teacher Volunteers as above.</p>
<i>Donors</i>	Short-term individual visitors to Cambodia who are significant SeeBeyondBorders donors are invited for on-off and limited visits to view our work.	<p>All visits will be arranged in advance through our office.</p> <p>Individuals to complete the Child and Vulnerable People Protection Self Declaration form and to read and sign the declaration to undertake to abide by all SeeBeyondBorders' Policies including the Safeguarding Policy, Child and Vulnerable People Protection Policy and the Code of Conduct.</p> <p>The donor will be supervised at all times by a senior member of the SeeBeyondBorders Cambodian Leadership Team when in schools (no more that 2-3 hours) and therefore will have minimal contact with children.</p> <p>The exchange of mailing addresses and contact details (including online forums) is not permitted at any time.</p> <p>Other considerations are the same as with Teacher Volunteers as set out above.</p>
<i>Corporate Trip participants</i>	Long-term corporate partners every year are invited to join SeeBeyondBorders in	All visits are arranged in advance through our office and participants are initially selected by their organisations who vouch for their good character.

<i>Type of visitor</i>	<i>Description of visit</i>	<i>Safeguards and Guidelines</i>
	<p>Cambodia for up to a two week volunteering experience to offer an insight into the complexities we face in our efforts to deliver meaningful dividends from their investment.</p>	<p>Participants need to have a Police or Working with Children checks.</p> <p>Trip participants are expected to read and sign the declaration to undertake to abide by all SeeBeyondBorders’ Policies including the Safeguarding Policy, Child and Vulnerable People Protection Policy and the Code of Conduct.</p> <p>All volunteers/donors will receive a child safeguarding briefing that includes clear child protection and behavioural guidelines.</p> <p>All corporate partner visits to schools are accompanied by a member/s of the SeeBeyondBorders team.</p> <p>The exchange of mailing addresses and contact details (including online forums) is not permitted at any time.</p> <p>Other considerations are as per Teacher Volunteers as above</p>
<i>Board &amp; Trustee Members</i>	<p>SeeBeyondBorders Australian Board members, UK Trustees and Irish Trustees who have sustained relationships with us prior to their trip.</p>	<p>All Board members and Trustees are to have a current Working with Children or Police check. Their visits are arranged in advance through our office. Any accompanying family members are subject to the same arrangements as Donors.</p> <p>Where they haven’t already done so these individuals are expected to read and sign the declaration to undertake to abide by all SeeBeyondBorders’ Policies including the Safeguarding Policy, Child and Vulnerable People Protection Policy and the Code of Conduct.</p> <p>The visitor will be supervised at all times by a senior member of the SeeBeyondBorders Cambodian Leadership Team for a short visit to the schools (no more that 2-3 hours) and therefore will have minimal contact with children.</p>
<i>Staff from Overseas Office Locations</i>	<p>This includes SeeBeyondBorders staff and volunteers visiting the Cambodia operations</p>	<p>All visits will be arranged in advance through our office.</p> <p>Where they have not already done so, individuals are to complete the Child and Vulnerable People</p>

<i>Type of visitor</i>	<i>Description of visit</i>	<i>Safeguards and Guidelines</i>
	<p>from the UK, Ireland and Australia</p>	<p>Protection Self Declaration form and to read and sign the declaration to undertake to abide by all SeeBeyondBorders' Policies including the Safeguarding Policy, Child and Vulnerable People Protection Policy and the Code of Conduct.</p> <p>The staff member will be supervised at all times by a senior member of the SeeBeyondBorders Cambodian Leadership Team when in schools (no more that 2-3 hours) and therefore will have minimal contact with children.</p> <p>The exchange of mailing addresses and contact details (including online forums) is not permitted at any time.</p> <p>Other considerations are the same as with Teacher Volunteers as set out above.</p>

## APPENDIX C: Child Abuse Reporting Processes, Support and Response

SeeBeyondBorders takes any concerns and/or reports of abuse against children seriously and will rigorously investigate and act on these. The Child Protection & Inclusion Officer plays a key role within the associated processes.

### Who should report?

All SeeBeyondBorders personnel, defined as:

- board members and trustees
- current staff and volunteers
- external consultants and contractors (paid or voluntary)
- contracted staff or personnel of contracted organisation and services
- project team participants.

Any other person working for or on behalf of SeeBeyondBorders.

Individuals and third parties who through their association with SeeBeyondBorders may visit our project activities.

### What should be reported?

- Any disclosure or allegation about or suspicion of abuse that is made by someone in or involved with SeeBeyondBorders, including beneficiaries and third parties.
- Any behaviour by anyone employed by, volunteering with or visiting SeeBeyondBorders that breaches the Safeguarding Policy and/or Child & Vulnerable People Protection Policy.
- Inappropriate use of the organisation's photographs and other media.
- Staff, volunteers and visitors engaging in suspicious behaviour linked to child trafficking, exploitation, abuse, and similar activities.
- Any suspicion of abuse, neglect or exploitation of a child or vulnerable beneficiary that may be as a result of actions of someone from outside of SeeBeyondBorders.

### Who to report to?

Any incidents or concerns about abuse of children or vulnerable people, safeguarding, sexual exploitation, sexual abuse, or sexual harassment must be reported immediately. In all countries, the Safeguarding Focal Point should be the first person to receive the report, but if it is inappropriate to report to this person (eg if they might be implicated in the allegations), there are other people who will be able to receive the report, as follows:

#### Cambodia

Safeguarding Focal Point (and Child Protection Officer): Kimlen Tan

*If not appropriate to report to the Safeguarding Focal Point, please report to one of the following people:*

General Manager, HR and Finance: Derek Culligan

Country Manager: Pov Pheung

CEO: Edward Shuttleworth

#### Australia

Safeguarding Focal Point: Priscilla Chang

*If not appropriate to report to the Safeguarding Focal Point, please report to one of the following people:*

General Manager, Australia: Andy Wade

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CEO: Edward Shuttleworth

### UK

Safeguarding Focal Point: Jayne Crow

*If not appropriate to report to the Safeguarding Focal Point, please report to one of the following people:*

UK Country Manager: Sarah Reynolds

CEO: Edward Shuttleworth

### **Organisational Reporting Procedures**

Reporting of any cause for concern will follow the same procedure regardless of where the report is made. Reports can be made by anyone and can be done in writing or verbally. Written reports do not have to be made using the reporting forms, an email or hand-written note is sufficient, however it is good practice that any report is followed up with Cause for Concern reporting forms.

In the first instance the Child Protection & Inclusion Officer will manage the reporting procedures, however if the Child Protection & Inclusion Officer is unavailable or it is not appropriate for them to lead the process this will then fall to the Country Manager in conjunction with the Country Director/CEO.

Whoever is leading the process will liaise directly with the Compliance Lead who is responsible for working with the CEO to ensure appropriate reports are provided immediately to any donors, regulatory organisations or civil authorities including Police forces as appropriate as discussed further in the section below.

The person leading the process (ie the Child Protection Officer or the Country Manager) will be responsible for liaising with the leadership team regarding any reports, investigations and actions to be taken as appropriate to the circumstances.

### **Steps to be taken:**

- The Child Protection & Inclusion Officer will consult with the Compliance Lead and conduct an initial assessment of the concern and decide on immediate action to be taken.
- The Child Protection & Inclusion Officer (or other appropriate person as per the section above on 'who to report to') will follow up to ensure the appropriate reporting forms and documentation is completed and filed. They will then become the 'Lead Officer' for the concern/incident.
- If required, the Lead Officer will seek support for the immediate protection of the child or vulnerable beneficiary. Relevant referrals can be made through the organisations listed in Appendix D of the Child and Vulnerable People Protection Policy.
- The Lead Officer will co-ordinate the gathering of information to investigate the concern/incident and liaise with the Compliance Lead (or other appropriate person). There is no set time for gathering information and evidence as it will depend on the nature of the concern and who is involved. However, it should be done as speedily as possible and the Lead Officer is responsible for daily recording of action taken by anyone involved.
- Initial information collected within the first 24 hours will be referred to the Leadership Team for them to decide whether they feel a criminal offence has taken place. If there is any doubt, it should be treated as criminal. All criminal offences or suspected offences will be reported to the police in the country the offence took place and in the resident country of the suspected

offender. Contact with the Police in the respective countries is to be made by the respective Country Manager or CEO only. If an occurrence of a breach of Policy is not considered to be criminal, then the organisation's disciplinary and grievance/complaints policies and procedures will be followed.

- The Lead Officer will ensure that the Leadership Team is updated regularly on the information gathered and co-ordinate the organisation's decision on action to be taken. External donors and regulatory bodies will be informed as appropriate.
- Once all the information that is available and relevant is gathered, the Lead Officer will provide a written report to the Compliance Lead (or other appropriate person) within 4 hours, using the Cause for Concern report. This will then be referred to the Leadership Team (to be discussed with a minimum of 3 members of the leadership team with a gender mix represented), who will meet on the same day as the report is received, unless it is received within 1 hour of the end of business and then they will meet at the beginning of the next working day (this is subject to the nature of the report and if it is deemed urgent, then a meeting will be called immediately). This representation of the Leadership Team will decide on the action to be taken as per SBB policies and procedures.
- In all cases the CEO will be kept fully informed and his counsel sought about appropriate actions where communication and time permit. Liaison with external parties is naturally a priority and needs to be undertaken by the Leadership Team in conjunction with the Compliance Lead ideally including the CEO or separately with the CEO as communications and availability allow.
- Only when all action has been taken and the cause for concern/incident has been fully investigated and responded to, can it then be closed and filed.
- Files will be kept in a secure location in SBB offices (Cambodia, Australia or UK as appropriate) for a minimum of 7 years.

### **Confidentiality**

Any staff member will ensure that any concern raised to them is handled according to the principles of confidentiality, safety, impartiality, thoroughness, timeliness and accuracy.

All complaints and reports, and the names of people involved, will be handled in the strictest of confidence. Details will only be released on a 'need to know' basis, or when required by relevant local, Australian or UK law, or when a notification to police or child protection authorities has been made.

## APPENDIX D: Contact details for child protection and agencies in Cambodia

Organization	Contact Details	Referral Cause
<b>SEEBEYONDBORDERS</b>	Child Protection & Inclusion Officer / Safeguarding Focal Point - Kimlen Tan kimlen@seebeyondborders.org CEO - Ed Shuttleworth ed@seebeyondborders.org feedback@seebeyondborders.org	First points of contact for SeeBeyondBorders staff and volunteers/donors.
<b>CHILDSAFE HOTLINE</b> ( <a href="http://thinkchildsafe.org/hotline/">http://thinkchildsafe.org/hotline/</a> )	012 311 112 (Phnom Penh), 017 358 758 (Siem Reap), 092 911 115 (Battambang) childsafe@friends-international.org	Works with a network of NGOs to provide services and referrals for all Child Protection issues/ abuse
<b>NATIONAL POLICE HOTLINE:</b>	1288 or 023 997 919	Suspected sexual abuse or trafficking
<b>CAMBODIA CHILD HELPLINE</b> ( <a href="http://childhelpline.org.kh/en/">http://childhelpline.org.kh/en/</a> )	Call 1280 or SMS 017 985 810 (toll free)	Professional phone-counselling and information service, as well as referrals and follow ups for children and concerned citizens

### ***Declaration of Understanding and Compliance***

I, \_\_\_\_\_ (write name), declare that I have read and understood the contents of the SeeBeyondBorders Child & Vulnerable People Protection Policy and the SeeBeyondBorders Code of Conduct for Working with Children and Vulnerable People and confirm that I understand my responsibilities to comply, as specially stated in Appendix A.

Signed \_\_\_\_\_ Date \_\_\_\_\_

Role/Association \_\_\_\_\_