



POLICY

CHILD & VULNERABLE PEOPLE PROTECTION POLICY

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.

As a recipient of DFAT funding, SeeBeyondBorders also uses DFAT's 9 Minimum Child Protection Standards, as set out in Appendix D, as a basis for this policy and related procedures.

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 HR Manual 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 Vulnerable People.

10. REPORTING

It is mandatory for all SeeBeyondBorders Personnel (as defined in Section 3) to immediately report any suspected, alleged or evidenced case of child exploitation, abuse or policy non-compliance to the Safeguarding Focal Point or most appropriate alternative individual, as outlined in Appendix C.

SeeBeyondBorders, in turn, is obligated to report any suspected, alleged or evidenced incidents to some funders in Australia, the UK and Ireland. The details of these reporting obligations are included in Appendix C and will be managed by the Compliance Manager.

11. BREACH OF POLICY

SeeBeyondBorders takes any concerns and/or reports of abuse against children or policy non-compliance very seriously and will rigorously investigate and act on these.

SeeBeyondBorders will exercise its right to dismiss (from employment) or withdraw (from assignment) SeeBeyondBorders Personnel when it considers that the person poses an unacceptable risk to the safety or well-being of children or vulnerable people, to prevent the individual from working with children or vulnerable people. This reflects our policy principle of Zero Tolerance of abuse or exploitation. If deemed appropriate, SeeBeyondBorders may suspend Personnel or transfer them to other duties as a temporary measure while an investigation is conducted.

SeeBeyondBorders reserves the right to terminate contract negotiations, refuse to engage an individual, or require an individual to be replaced if appropriate criminal record checks are not undertaken, or cannot be undertaken for roles that are identified as working with or having contact with children.

12. 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.

13. POLICY MANAGEMENT

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

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Amendments and or developments will be recommended to the Board from time to time as deemed appropriate by senior management. Formal reviews are recommended within 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		
CVPPP/09/20 20/1.0	Policy Update	Board 16.09.2020	Agenda item 8	28.9.2020	File Note 28.9.20		
CVPPP/09/20 20/1.1	Policy Update	CEO 08.09.2021					

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 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/vulnerable person or using children's images for work-related purposes, SeeBeyondBorders will ensure:

- Local traditions or restrictions for reproducing personal images are adhered to before photographing or filming.
- Informed consent is obtained from the child/vulnerable person (verbally) and parent/guardian of the child/vulnerable person (in writing) before photographing or filming including an explanation of how the photograph or film will be used. This process will be conducted in Khmer.
- All publications present children/vulnerable people in a dignified and respectful manner and not in a vulnerable or submissive manner, and that children are fully clothed with shoulders covered and not in poses that could be seen as sexually suggestive.
- Images honestly represent and convey the context and complexity of the situations in which they are taken.
- File labels, meta data and text descriptions do not reveal identifying information about a child or vulnerable person when sending images electronically or publishing images in any form. This includes full names, names of schools, specific geographical location details and any other information that may enable a third party to identify and locate a specific person as a result of a

SeeBeyondBorders publication. Appoint selected members of the SeeBeyondBorders team with cross reference access to the library of photographs and the informed consent forms, to ensure and document that there is informed consent for images before publication.

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 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 Compliance Manager; Country Manager; CEO; 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:

Type of visitor	Description of visit	Safeguards and Guidelines
<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 the individual to a close.</p>

<i>Type of visitor</i>	<i>Description of visit</i>	<i>Safeguards and Guidelines</i>
<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 one-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.

Type of visitor	Description of visit	Safeguards and Guidelines
	<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 check.</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>
<p><i>Board & Trustee Members</i></p>	<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>
<p><i>Staff from Overseas Office Locations</i></p>	<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): Taing Im Lok

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, HR and Finance: Derek Culligan

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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

Reports can be made at any time from any country to safeguarding@seebeyondborders.org.

SeeBeyondBorders has additional obligations to report incidents to funders, as follows:

Australia

It is mandatory for SeeBeyondBorders (as a DFAT funded partner) to immediately report any suspected or alleged case of child exploitation, abuse or policy non-compliance by anyone within scope of the DFAT Child Protection Policy in connection with official duties or business. All reports should be made to childwelfare@dfat.gov.au.

Reports should be accompanied by a Child Protection Notification Form, available at www.dfat.gov.au/childprotection

If there are any doubts about whether the incident should be reported, SeeBeyondBorders will seek confidential advice from DFAT's Child Protection Compliance Section on childprotection@DFAT.gov.au or on +61 2 6178 5100.

UK

Concerns regarding a breach in safeguarding policy should be reported immediately to FCDO's Fund Manager, Mannion Daniels by emailing ukaidssafeguarding@manniondaniels.com.

Organisational Reporting Procedures

As soon as a child protection incident or breach of policy is reported, the following actions will be taken:

1. The Child Protection Officer will complete a Cause for Concern report with the information that is currently available (found [here](#) in SBB New Drive/Administration/Published Documents/Supporting Documentation)
2. The Child Protection Officer will report the incident to the Compliance Manager and/or the CEO
3. The Compliance Manager will complete a Child Incident Notification form (provided by DfAT and saved [here](#) in SBB New Drive/Administration/Published Documents/Supporting Documentation) for any incident that is witnessed/suspected in a DFAT funded project
4. The Compliance Manager will send the Child Incident Notification form to childwelfare@dfat.gov.au within 24 hours of report being received
5. The Compliance Manager will notify FCDO's Fund Manager of the allegation or suspicion via email on ukaidssafeguarding@manniondaniels.com if it has taken place in an FCDO funded project
6. The Child Protection Officer will continue investigating to gain more details (where necessary) and take appropriate actions at a local level (such as reporting to school principal, district office of education, national agencies or police) as agreed with the leadership team and/or CEO

7. The Child Protection Officer will add full details of the incident to the Child Protection register

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: DFAT’s 9 Minimum Child Protection Standards¹

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>1.</p> <p>Partners</p> <p>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 relevant minimum child protection standards.</p> <p>Individuals</p> <p>An individual contractor is not required to have a child protection policy. However, they will be required to sign a code of conduct that applies and builds on where</p>	<p>Partners</p> <ul style="list-style-type: none"> - Child protection policy in place - Personnel aware of the organisation’s child protection policy (e.g. through internal communication and training) - Documented plan for ensuring downstream DFAT funded partners are meeting the minimum standards - Initial risk assessment of organisation and activities to inform policy development <p>Individuals</p> <ul style="list-style-type: none"> Attend child protection training Sign code of conduct Commitment to child protection Current Criminal Record Check 	<p>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 funded programs.</p>	<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>

¹ Extracted from DFAT Child Protection Policy, Jan 2018

Requirement	Minimum standard	Minimum standard – evidence	Why is this required?	What is the risk without it?
	<p>appropriate DFAT’s Child Protection Professional Behaviours and provide evidence of their commitment to child protection.</p>			
	<p>2. The organisation’s child protection policy includes a documented reporting procedure for child exploitation and abuse allegations, code of conduct and policy non-compliance, including available sanctions for breaches.</p>	<ul style="list-style-type: none"> - Organisation’s guidelines for managing concerns or allegations of child exploitation and abuse, and policy non-compliance - Documentary evidence that personnel can raise concerns about a child’s safety or well-being or unacceptable behaviour by personnel - Documentary evidence outlining the organisation’s details of available sanctions - Documentary evidence that policy and reporting information is publically available and accessible to community members 	<p>An effective child protection policy requires a report handling procedure.</p> <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>Personnel are unaware how to report concerning behaviour.</p> <p>Community members are unaware how to report concerning behaviour.</p>

Requirement	Minimum standard	Minimum standard – evidence	Why is this required?	What is the risk without it?
	<p>3.</p> <p>The organisation provides child protection training for personnel, including downstream partners.</p>	<ul style="list-style-type: none"> - Training attendance records - Training agendas and timeframes for training - Materials used in training 	<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.</p> <p>Personnel do not know how to report concerning behaviour.</p>
	<p>4.</p> <p>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"> - Referenced in relevant documentation, including policies, contracts and human resource guidelines 	<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>

Requirement	Minimum standard	Minimum standard – evidence	Why is this required?	What is the risk without it?
	<p>5.</p> <p>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"> - Policy is subject to regular review in accordance to the policy commitment, or at least every five years 	<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>Undertaking assessment and management of risk</p>	<p>6.</p> <p>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"> - Risk plan identifying activities and measures to reduce or remove the risk to children - Documentation that risk assessments are reviewed and updated regularly during the life of the activity - Evidence of adaption to local context (when a different approach to standard risk controls is required) 	<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>
<p>Recruitment and screening, and employment practices in place</p>	<p>7.</p> <p>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"> - Employment contracts for personnel/consultants contain appropriate provisions 	<p>Robust recruitment, screening and employment practices reinforce the importance of the organisation’s child protection policy to personnel.</p>	<p>Personnel that pose unacceptable risks to children are unable to be removed (suspended, transferred or terminated) without a criminal conviction.</p>

Requirement	Minimum standard	Minimum standard – evidence	Why is this required?	What is the risk without it?
	<p>8. Contact with children positions 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"> - criminal record checks before engagement - verbal referee checks <p>Working with children positions 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>	<ul style="list-style-type: none"> - Documented criminal record checks for personnel in contact with children - Documented verbal referee checks - Documented request for an applicant to disclose whether they have been charged with child exploitation offences, and their response - Interview plans incorporating behavioural-based interview questions that are specific to positions that involve working with children - Review checks when personnel have a change in circumstances - 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 	<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 prevent access to 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</p>	<p>Your organisation may be targeted by adults who wish to harm children (due to weak recruitment and screening practices) A person who poses an unacceptable risk of harm to children (as indicated by their background) is unknowingly appointed to a position within the organisation.</p>

Requirement	Minimum standard	Minimum standard – evidence	Why is this required?	What is the risk without it?
		exploitation, may be accepted instead - Checks must be conducted for each country in which the individual has lived for 12 months or longer over the last 5 years, and for the individual’s countries of citizenship	children from applying for positions.	
	<p>9.</p> <p>The organisation has a child protection code of conduct that meets and – builds on (where appropriate) – the minimum standard set by DFAT (see Attachment B – DFAT’s Child Protection –Professional Behaviours).</p>	<ul style="list-style-type: none"> - A risk based child protection code of conduct based on DFAT’s Child Protection – Professional Behaviours - Signed codes of conduct or a register documenting details of personnel who have signed the code of conduct, or inclusion in employment contracts - Signed image consent forms/ verbal consent file notes 	<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.</p> <p>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>

APPENDIX E: Contact details for child protection and agencies in Cambodia

Organization	Contact Details	Referral Cause
SEEBEYONDBORDERS	Child Protection & Inclusion Officer / Safeguarding Focal Point - Taing Im Lok taing_im.lok@seebeyondborders.org CEO - Ed Shuttleworth ed@seebeyondborders.org safeguarding@seebeyondborders.org	First points of contact for SeeBeyondBorders staff and volunteers/donors.
CHILDSAFE HOTLINE (http://thinkchildsafe.org/hotline/)	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
NATIONAL POLICE HOTLINE:	1288 or 023 997 919	Suspected sexual abuse or trafficking
CAMBODIA CHILD HELPLINE (http://childhelpline.org.kh/en/)	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 _____