CR 000 709 Children and Vulnerable People Safeguarding Policy

About This Policy

This policy outlines the legal obligations and safeguarding responsibilities of all individuals representing ADRA Australia in protecting children and vulnerable people.

It applies to **ADRA Australia Personnel**, including employees, volunteers, contractors, interns, board directors, Conference ADRA Directors, and personnel from partner organisations engaged by or representing ADRA Australia. These individuals are collectively referred to as **ADRA Australia Personnel** throughout this policy.

To effectively implement this policy, ADRA Australia has developed a Safeguarding Code of Conduct and a Safeguarding Operations Guideline.

Trigger Warning

This policy contains references to sexual abuse, exploitation, and harassment. If you need support, contact Adsafe:

Phone: +61 2 9847 3488 | AU Helpline: 1800 220 468
To report concerns: safeguarding@adra.org.au

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1. PURPOSE

This policy is designed to uphold strong safeguarding standards across all ADRA Australia operations. It aims to protect children and vulnerable people by preventing abuse, promoting accountability, supporting survivors, and ensuring legal and sector compliance. Specifically, this policy aims to:

- **Protect children and vulnerable people** by proactively identifying, reporting, and responding to risks of abuse, exploitation, and neglect. It seeks to prevent harm through screening, training, and clear consequences for misconduct.
- **Establish clear standards and promote accountability** by defining the roles and responsibilities of ADRA Australia personnel and partners, setting expectations for respectful and ethical conduct, and maintaining a robust framework for reporting and investigation.
- **Support victims and survivors** by providing access to appropriate assistance, protection, and guidance. The policy also promotes awareness and ongoing training to build a culture of safety and responsiveness.
- **Ensure legal compliance** with local, national, and international laws, including Department of Foreign Affairs and Trade (DFAT)'s Child Protection and Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) policies.
- **Align with sector standards**, including the IASC Six Core Principles on PSEA, the ACFID Code of Conduct, and CAN DO's Joint Commitment to Safeguarding.

2. SCOPE

This policy applies to all individuals representing ADRA Australia, referred to as **ADRA Australia Personnel**. This includes employees, contractors, sub-contractors, interns, volunteers, Board Directors, Conference ADRA Directors, and personnel from partner organisations engaged by or acting on behalf of ADRA Australia. It covers **all ADRA-funded activities**, regardless of:

- **Funding source**
- **Location**
- **Department**
- Whether or not children or vulnerable people are the primary focus

The policy applies **at all times**—during work hours, outside of work hours, and in any context where someone is representing ADRA Australia. Stakeholders are expected to uphold these safeguarding standards **even when they exceed local legal requirements**.

3. DEFINITIONS

To ensure clarity, the policy defines key terms:

3.1 Vulnerable Person

A *vulnerable person* is any child (under 18) or adult who is at increased risk of harm, exploitation, or abuse due to a range of factors, including:

a. **Personal and physical factors**: age-related vulnerability, disability, and mental health conditions.

b. **Social and economic factors**: socio-economic disadvantage, displacement, and systemic or cultural marginalisation.

c. **Situational and relational factors**: power imbalances, language barriers, survivors of sexual exploitation, abuse, or harassment (SEAH), and victims of modern slavery.

Exclusion Clause: Individuals with a history of perpetrating abuse or exploitation of children or vulnerable people are *not* considered vulnerable under this policy.

3.2 Sexual Exploitation

Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. This includes gaining monetary, social, or political benefit.

3.3 Sexual Abuse

The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes attempted rape and sexual assault.

Note: All sexual activity with children under the age of 18 is considered sexual abuse, regardless of consent or local age-of-consent laws.

3.4 Sexual Harassment

Unwelcome sexual behaviour that may cause a person to feel offended, humiliated, or intimidated. It can be a single incident or repeated behaviour.

Note: For further terms and a deeper explanation of concepts refer Safeguarding Operations Guideline.

4. POLICY STATEMENT

ADRA Australia maintains a zero-tolerance stance toward SEAH in any form, whether within the organisation or among those it works with. This commitment ensures that every allegation will be acted upon fairly, timely, and transparently, with due regard for procedural fairness.

This policy is fundamentally guided by six core principles, adopted from the Australian Government DFAT:

4.1 Principle 1: Zero Tolerance of Inaction

Zero tolerance means every allegation is addressed promptly, fairly, and transparently.

4.2 Principle 2: Strong Leadership Accelerates Culture Change

Leaders actively fostering a safeguarding culture and being accountable for prevention efforts.

4.3 Principle 3: Survivor Needs Are Prioritised

Adopting a 'do no harm' approach that respects their rights, needs, and wishes, while ensuring dignity, involvement in decision-making, privacy, and access to essential services.

4.4 Principle 4: Preventing SEAH is a Shared Responsibility

Requires collaboration with partners, governments, and communities.

4.5 Principle 5: Gender Inequality & Other Power Imbalances Increase Vulnerability

Recognises SEAH stems from unequal power dynamics (e.g., gender, authority, ability, age, ethnicity, socio-economic status). ADRA's approach is guided by its Gender Equality and Disability Inclusion Policies.

4.6 Principle 6: Stronger Reporting Will Enhance Accountability & Transparency

Achieved by informing beneficiaries of their rights and reporting channels in accessible, culturally sensitive, and age-appropriate ways.

5. ORGANISATIONAL COMMITMENTS

ADRA Australia is committed to proactively preventing harm and fostering a culture of safety and accountability. These commitments support the implementation of this policy and reflect our zero-tolerance approach to SEAH. We commit to:

5.1 Safeguarding Code of Conduct

All ADRA Australia Personnel must sign and follow a Code of Conduct that sets clear behavioural expectations and strictly prohibits sexual relationships with beneficiaries.

5.2 Safe Programs and Risk Management

Safeguarding and risk management are integrated into all our programs through comprehensive risk assessments, partner audits, and continuous monitoring.

5.3 Rigorous Recruitment and Screening

Recruitment processes are designed to engage safe and suitable personnel. These include:

- **a.** Behavioural interviews
- **b.** Two verbal references (one from the most recent employer)
- **c.** Criminal record checks and Working With Children Checks (WWCC)
- **d.** Adsafe screening for Church-affiliated personnel
- **e.** Safeguarding expectations are clearly communicated at every stage.

5.4 Mandatory Induction and Training

All personnel and partners receive:

- **a.** A mandatory safeguarding induction
- **b.** Regular, role-specific training, including the prohibition of sexual relationships with beneficiaries and survivor-centred approaches.

5.5 Tailored Guidelines and Tools

Safeguarding tools and resources—such as risk templates and reporting forms—are tailored to the needs of different departments, programs and roles.

5.6 Visible Leadership

Leaders model safeguarding behaviours and ensure it is embedded in decisions, operations, and organisational culture.

5.7 Accountability in Partnerships

ADRA Australia requires all partners, suppliers, and contractors to uphold equivalent safeguarding standards. This is achieved through:

a. Rigorous due diligence, including risk assessments and personnel screening prior to engagement

b. Formal agreements that include safeguarding clauses and require partners to maintain equivalent child protection and PSEAH policies

c. Ongoing oversight through audits, risk monitoring, and mandatory safeguarding training

Where necessary, ADRA provides support to help partners meet these standards. Failure to comply may result in the suspension or termination of agreements or project funding.

6. ROLES AND RESPONSIBILITIES

Safeguarding is a shared responsibility across the organisation. The key roles below provide a framework, but individuals may have additional safeguarding duties specified in their Job Descriptions (JDs), performance plans, or partnership agreements.

All ADRA Australia Personnel
Comply with safeguarding policies, uphold ethical behaviour, and report any concerns or incidents.

- **Board of Directors**
  Embed safeguarding in governance, ensure adequate resourcing, review reports, and appoint a Board Safeguarding Focal Point.
- **Chief Executive Officer (CEO)**
  Provide strategic oversight, supervise the Safeguarding Focal Lead, manage high-level concerns, and ensure organisation-wide risk management.
- **Safeguarding Focal Lead**
  Coordinate safeguarding implementation, oversee training, respond to complaints, liaise with external bodies, and chair the Safeguarding Committee.
- **Human Resources (HR)**
  Support training, maintain compliance registers, integrate safeguarding into recruitment and performance systems, and ensure police/WWCC checks.
- **Directors and Volunteer Managers**
  Embed safeguarding in departmental operations, support focal points, and promote a culture of accountability.
- **Department Safeguarding Focal Points**
  Support implementation at the departmental level, provide guidance, and escalate concerns as needed.

- **Safeguarding Committee**
  Monitor safeguarding systems, review risks, and support continuous improvement.
- **Partners and Contractors**
  Meet safeguarding requirements, provide staff training, report concerns, and comply with risk management expectations.

7. PROCEDURES

ADRA Australia is committed to responding to all safeguarding concerns with fairness, timeliness, and accountability.

7.1 Reporting

7.1.1 Who can report

All ADRA Australia Personnel are mandatory reporters, and community members, beneficiaries, and participants are encouraged to report.

7.1.2 What to report

Any suspected or alleged incident of exploitation, abuse, or harm involving children or vulnerable people, or any breach of the policy or Code of Conduct. *When in doubt, report.*

7.1.3 When to report

Reports should be made immediately, ideally within 24 hours.

a. If the Safeguarding Focal Lead is unavailable or the subject of the concern, report to the CEO.
b. If the CEO is involved, report to the Board Safeguarding Focal Point.

7.1.4 How to report

a. Complete Safeguarding Complaint Form (Annex 2) and email it to safeguarding@adra.org.au
b. Verbal reports can be made to the Safeguarding Focal Lead or a manager and must be documented.

7.1.5 Escalation

Reports may be escalated to:

a. Law enforcement
b. Statutory child protection agencies
c. DFAT, ACFID, CAN DO
d. Adsafe (if within scope)
e. ADRA International

7.1.6 Privacy and confidentiality

All reports are handled with care and sensitivity. Information is shared only on a strict need-to-know basis and securely stored.

7.2 Investigations

7.2.1 Survivor Support

a. ADRA Australia investigates all safeguarding concerns, guided by a **survivor-centred approach**, legal obligations, and procedural fairness.

b. Survivors undergo immediate risk assessment, are offered access to appropriate support services (e.g., counselling, advocacy), and are kept informed of investigation progress and outcomes.

7.2.2 Qualified investigators

Investigations are conducted by qualified professionals trained in trauma-informed approaches.

a. External investigators may be engaged if needed.

b. Adsafe's support may be requested where applicable.

c. Stakeholders and beneficiaries are encouraged to report, not investigate, concerns independently.

7.2.3 Record Keeping

All documentation related to complaints and investigations must be securely recorded by the Safeguarding Focal Lead to help identify patterns of concern.

7.2.4 Governing principles

Investigations are guided by neutrality, privacy, confidentiality, and procedural fairness. Criminal conduct is referred to appropriate legal authorities.

7.2.5 Investigation conclusion

Outcomes may include:

a. **Sustained**: Disciplinary action and/or legal referral

b. **Not sustained**: Individual resumes duties – reintegration support may be provided

c. **Inconclusive**: Risk assessment, interim measures, monitoring, or further inquiry

8. COMPLIANCE AND ENFORCEMENT

Breaches of this policy or the Safeguarding Code of Conduct may result in disciplinary action. All responses will follow principles of procedural fairness.

8.1 ADRA Australia Personnel

a. Serious breaches (e.g. sexual or physical abuse) may be referred to Adsafe for independent assessment.

b. Failure to report known or suspected concerns may lead to suspension, reassignment, or termination.

8.2 Partners and Contractors

a. Non-compliant partners may face termination of MOUs or project funding.

b. ADRA may provide support to meet standards; however, persistent failure to comply will not be tolerated.

8.3 Examples of Breaches

a. Engaging in or failing to report SEAH.
b. Breaching confidentiality or neglecting safeguarding duties.
c. Undermining ADRA Australia's safeguarding standards.

8.4 Procedural Fairness

a. Individuals have the right to respond and present evidence.
b. Good faith reports will not result in action against the reporter.
c. False or malicious allegations may lead to disciplinary action.

9. RELATED DOCUMENTS

This policy is supported by key internal documents:

- ADRA Australia Code of Conduct
- Safeguarding Code of Conduct
- Complaints Policy & Procedures
- Conflict of Interest Policy
- Disability Inclusion Policy
- Gender Equality Policy
- Gift Acceptance Policy
- Non-Development Activity Policy
- Privacy Policy
- Volunteer Policy
- Work Health and Safety Policy
- Workplace Relations Policy

Additional guides, forms, and templates support implementation and may be tailored by department. External standards referenced include:

- ACFID Code of Conduct
- IASC Six Core Principles on PSEA
- DFAT Child Protection and PSEAH policies
- ADSAFE policies
- CAN DO Joint Safeguarding Commitments.

10. REVIEW AND REVISION

This policy and its associated procedures will be reviewed **every three years**, or earlier if required, in response to legislative changes, sector developments, or organisational needs. Policy reviews may be initiated by the Safeguarding Focal Lead in consultation with the CEO.

ANNEX 1 – COMPLAINTS FORM

ADRA Representatives must report any behaviour that is suspected of causing harm and any instances of Policy non-compliance. You can lodge this form by sending it directly to the ADRA Australia Safeguarding Focal Point via safeguarding@adra.org.au

Please complete this form to the best of your knowledge.

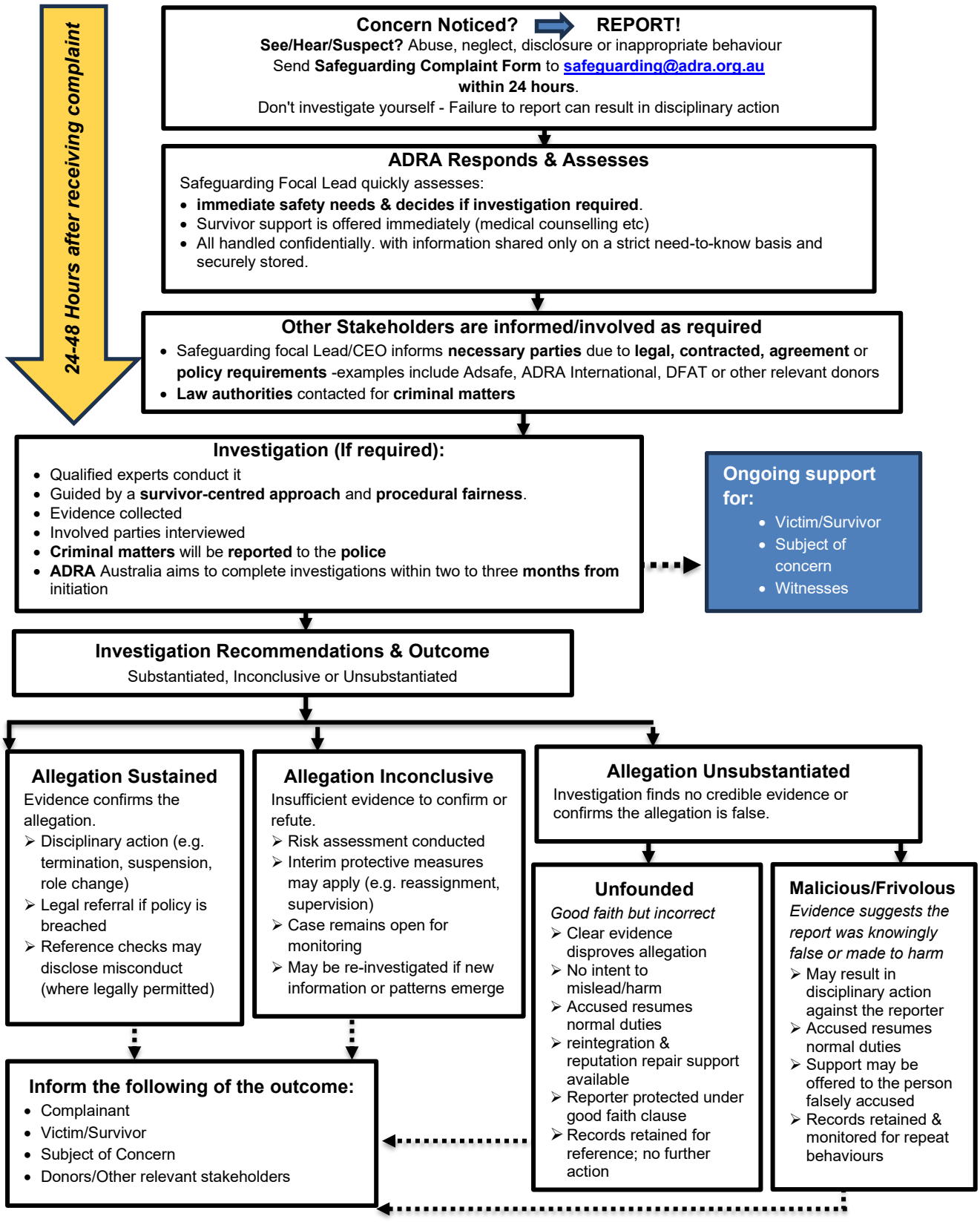
PART A – Complainant to complete:
The person making complaint (can be anonymous):
Date:

1. Who is the complaint about?
2. Who was the victim of the breach of conduct (name and contact details desirable but not essential)?
3. When did breach of conduct occur?
4. What was the breach of conduct?
5. Where did breach of conduct occur?
6. Who else was involved in this breach of conduct?
7. How did you come by this information about breach of conduct?
8. Any other details you would like to add?

PART B – Safeguarding Focal Point to complete:
Date received by ADRA Australia Safeguarding Focal Point:

1. When did breach of conduct occur?
2. Report origin (member agency, partner or community member):
3. Name of program/location of program:
4. Who is the report about?
5. Who was the victim of the breach of conduct (name and contact details desirable but not essential)?
6. Survivor support services offered:
7. What was the breach of conduct?
8. Was this complaint investigated? Yes/No
9. If No, why not?
10. Is there evidence or suspicion of a breach of conduct? Yes/No
11. If No, what is the next step you will take?
12. If Yes, what disciplinary action or further investigation will take place?
13. What is the final outcome of this complaint?
14. Report submitted to ADRA Australia? Yes/No
15. Date of completion:

Any documentation associated with the complaints procedure and investigation should be filed together for future reference if needed.

It is important to keep records as several unproven or minor breaches may indicate a pattern of negative behaviour that is forming in a person and more supervision should be implemented with such Personnel around minors.

ANNEX 2 – SAFEGUARDING CONCERN RESPONSE & INVESTIGATION FLOW