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1. PURPOSE

In line with IWDA's rights-based approach to international development practice, IWDA is committed to ensuring the safety and wellbeing of all children. IWDA believes that children have a right to survival, development, protection, empowerment and participation as enshrined in the [United Nations Convention on the Rights of the Child](#) and the associated optional protocols.

Due to the nature of IWDA and program partner activities, some of IWDA's work involves regular contact with children, including:

- working with children directly (in a small number of projects), i.e. as program beneficiaries.
- indirect work with children, i.e. as children that are brought along to activities with their parent or guardian; or via other care providers, and children that are located in the vicinity of activities.

This policy outlines how IWDA emphasises the rights of children to an equitable and safe future and will work to promote child-safe environments to ensure that all children directly associated with IWDA activities are protected from harm, and where they are the beneficiary, are supported in their empowerment and participation. It also sets out general principles, guidelines and obligations to assist IWDA stakeholders understand their role and responsibilities in protecting children.

2. SCOPE

This policy applies to all representatives of IWDA, including IWDA personnel (employees, volunteers, board members and consultants), family members accompanying staff on travel and assignment, and any other organisations or people acting for or on behalf of IWDA ('Representatives of IWDA').

This policy applies at all times when such persons are working for, travelling or representing IWDA, both during and outside normal working hours. It applies any time they are outside their country of residence on work-related travel, including socialising or holidaying (whether IWDA funded or self-funded) before or after work-related travel.

Staff of IWDA Partners are not considered IWDA representatives, but are required to comply with the requirements of this Policy as set out in clause 8.6.

This Child Protection Policy is part of a suite of Safeguarding documents, which must be read alongside this Policy. They include:

- IWDA Preventing Sexual Exploitation, Abuse or Harassment Policy.
- IWDA Safeguarding Code of Conduct.
- IWDA Safeguarding Reporting Procedure.

[Other associated policies and procedures are listed in section 12: Reference and Related Documents](#)

3. COMMITMENT STATEMENT

IWDA's vision is gender equality for all. Our purpose is to defend and advance the rights of diverse women and girls. We cannot achieve our purpose without an unwavering commitment to children's safety. IWDA has zero tolerance for child abuse, and we actively work to listen to and empower children. We put

systems in place to identify and manage risks to children through our services, programs, and partnerships. We carefully recruit and select personnel that align with our values and our commitment to children's safety. There are systems in place to respond when harm occurs. We will take all allegations or complaints about child safety seriously, ensuring that they are all reported in line with our Safeguarding Reporting Procedure.

4. DEFINITIONS

Board Member – A Director, Chair or Co-Chair on the Board of Directors of IWDA.

Child/Children - Means a person below the age of 18 years for the purposes of this Policy and the Safeguarding Code of Conduct.

Child Abuse - Abuse can be perpetrated against children of all ages, ethnicity and social backgrounds, abilities, sexual orientation, gender identity, religious beliefs and political persuasion. Child abuse can include physical, sexual, emotional, neglect, bullying, child labour, grooming and family violence. It can also include trafficking for the purposes of sex or labour and can include being used in or exposed to pornography. Child abuse can be both in person and through online platforms including social media. Child abuse can cause significant harm to a child's growth and development. Child abuse in all its forms is harmful.

Neglect - Neglect is the failure to provide for the child's basic needs for life to the extent that the child's health and development are, or are likely to be, placed at risk, including, Food, Clothing, Shelter, Medical attention, Supervision or care.

Emotional Abuse - Emotional abuse occurs when a child's parent, caregiver or any other adult repeatedly rejects the child or uses threats to frighten the child. This may involve children:

- Being repeatedly rejected, called names or being put down
- Being frightened by threats
- Experiencing continual coldness to the extent that it significantly damages their physical, social, intellectual or emotional development
- Being exposed to family violence.

Exposure to Family Violence - Family violence is behaviour by a person towards a family member that is:

- Physically or sexually abusive
- Emotionally (psychologically) abusive
- Coercive or in any way controls or dominates that family member and causes that family member to fear for their safety or wellbeing, or for that of another family member
- Causing a child to hear or witness or be exposed to the effects of behaviour referred to above
- Exposing a child to family violence which includes seeing, hearing or experiencing violence in a number of ways.

Physical Abuse - Physical abuse occurs when a child suffers or is likely to suffer significant harm from an injury inflicted by a child's parent or caregiver or any other adult. The injury may be inflicted intentionally or may be the inadvertent consequence of physical punishment or physically aggressive treatment of a child. This may take the form of punching, beating, shaking or otherwise harming a child.

Ill-treatment—disciplining or correcting a child in an unreasonable and seriously inappropriate or improper manner; making excessive and/or degrading demands of a child; hostile use of force towards a child; and/or a pattern of hostile or unreasonable and seriously inappropriate degrading comments or behaviour towards a child.

Sexual Abuse - Sexual abuse occurs when a person uses power, force or authority to involve a child in any form of sexual activity. Behaviour sex offenders engage in may include:

- touching or fondling children
- sending obscene or suggestive phone calls/texts to children
- exhibitionism and or voyeurism in front of children
- exposing children to pornographic images
- penetration with penis, finger or other object into the mouth, anus or vagina

It is important to note that sexual abuse includes both contact and non-contact behaviours.

Child Exploitation - One or more of the following:

- committing or coercing another person to commit an act or acts of abuse against a child
- possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material
- committing or coercing another person to commit an act or acts of grooming or online grooming
- using a minor for profit, labour, sexual gratification, or some other personal or financial advantage

Child Exploitation Material - Material that depicts (expressly or implicitly) a child as a victim of torture, cruelty, sexual or physical abuse.

Child Protection - An activity or initiative designed to protect children from any form of harm, particularly that arising from child exploitation and abuse.

Code of Conduct – Means the IWDA Safeguarding Code of Conduct in Annex 1.

Contractor – A person or organisation retained by IWDA to undertake a contract to provide materials, tasks or labour to do a service or job.

Grooming - Grooming is predatory behaviour designed to prepare a child for sexual abuse. Many perpetrators of sexual offences against children purposefully create relationships with children and young people, their families and carers in order to establish the conditions necessary for them to abuse the child. For example:

Spending special time with a child e.g. in private settings, away from their family or organisation, including online

- Isolating the child or young person from family and peers
- Giving gifts to a child
- Showing favouritism
- Allowing the child to step out of boundaries or rules
- Touching the child
- Testing and breaking professional boundaries.

Harm - Any detrimental effect on a child's physical, psychological or emotional wellbeing. Harm may be caused by financial, physical or emotional abuse, neglect, and/or sexual abuse or exploitation whether intended or unintended.

Harmful Sexual Behaviour - a term used to describe sexual behaviours exhibited by children which are developmentally inappropriate and cause harm to themselves or to others.

Informed consent – Agreement to do something or to allow something to happen only after all the relevant facts are known.

IWDA Personnel - all IWDA employees, directors, volunteers, interns, consultants and contractors.

IWDA Representative: IWDA personnel and family members accompanying IWDA personnel on travel to project sites, and visitors to IWDA project sites.

Online Grooming - The act of sending an electronic message to a child, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender; or of sending an electronic message with indecent content to a recipient who the sender believes to be a child.

Program partners – organisations with whom IWDA has signed Partnership Agreements and/or who receive DFAT or other donor funding in association with IWDA programs.

Visitor – A person who is not an IWDA personnel, visiting an IWDA project site (i.e. donor/supporter visits).

Volunteer – An unpaid person who acts on a voluntary basis supporting IWDA program delivery or operations.

5. GUIDING PRINCIPALS

Zero tolerance of child exploitation and abuse - IWDA will not tolerate any form of child exploitation or abuse. All representatives of IWDA are held to high standards in their conduct with and around children and young people.

Child protection risk and impact – IWDA will work to identify, mitigate and reduce the risks to children through its programs and services.

Shared responsibility – IWDA believes keeping children safe is everyone’s responsibility.

Best interests of the child –IWDA supports the rights of children and their participation in decision making. In all actions concerning children, the best interest of the child will be a primary consideration.

Accountability – IWDA commits to maintaining systems to document, monitor and report on the implementation of the Child Protection Policy.

Procedural fairness - When responding to concerns or allegations of child abuse, exploitation or misconduct, IWDA will apply relevant procedural fairness processes and ensure all stakeholders receive appropriate support.

6. POLICY

IWDA recognises that children are members of every community in which we work. IWDA’s work ranges from working with children in programs focused on engagement and positively impacting the lives of children, through to activities with no direct or indirect contact.

IWDA will apply child safe practices to all aspects of program management and implementation, including recruitment, training and awareness, risk management, selecting and monitoring program partnerships, reporting and responding to misconduct and applying sanctions. IWDA’s child safe practices include:

- requiring representatives of IWDA to commit to ‘do no harm’ to the children and communities we support.
- embedding compliance with the Australian Council for International Development (ACFID) and Department of Foreign Affairs & Trade (DFAT) Code of Conduct and Child Protection Policy, respectively in its policies and systems.
- requiring all program partners to be compliant with child protection standards
- promoting our child safe commitment and reporting processes and pathways publicly and on our website, ensuring our messaging to keep children safe is transparent and accessible.
- understanding the vulnerability of all children, particularly those more at risk of abuse or exploitation.

- never identifying children as survivors of sexual exploitation, family violence or abuse in any IWDA publication or external report.
 - always prioritising the best interests and protection of children over the opportunity for advocacy and promotion of the agency.
 - at all times portraying and treating children in a respectful and appropriate way. The participation and empowerment of children and young people is prioritised at all times.
 - prioritising the safety of children in activities regarding human rights and changing gender norms.
 - committing to a culture of reporting and responding to all allegations, suspicions, disclosures and breaches to this Child Protection Policy or Safeguarding Code of Conduct promptly and efficiently.
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- investigating all allegations, suspicions, disclosures and breaches whilst supporting notifiers, alleged victims and alleged perpetrators, and ensuring a fair and thorough investigation is undertaken.
 - protecting confidentiality, including protecting the confidentiality of children's information, (ensuring data is stored appropriately and accessed only by authorised personnel).

7. RESPONSIBILITIES

Board	<ul style="list-style-type: none"> • Oversight of this Policy • Approval of any revisions to this policy and IWDA's Safeguarding Code of Conduct. • Oversight and management of any child protection incident reports that relate to the IWDA CEO
CEO	<ul style="list-style-type: none"> • Overall implementation of this Policy • Authorising financial and human resource allocations to meet child protection standards • Accountability for tracking and responding to child protection issues to ensure continuous monitoring and improvement • Authorising changes to the procedures, systems and performance management which support this policy • Monitoring IWDA compliance with relevant legislation, sector and donor requirements • Holding people accountable to IWDA's Child Protection requirements • Oversight and management of all child protection incident reports, including determining the most appropriate methods and personnel for investigating and addressing such reports, in accordance with this policy and the Whistleblowing procedure where applicable the Safeguarding Reporting Procedure.
Safeguarding Focal Points	<ul style="list-style-type: none"> • Supporting the completion of any child protection incident reporting and ensuring reporting procedures and documentation is completed. • Reviewing and providing feedback on program partner and IWDA organisation policy and procedures.

	<ul style="list-style-type: none"> • Reviewing and monitoring child protection capacity and risk assessments. • Delivering training on child protection and IWDA’s child protection reporting procedures • Acting as a first point of contact when IWDA personnel have a child protection question or concern and reporting the same to the CEO or, where the CEO is implicated, to the chair of the Board
The IWDA Leadership Team	<ul style="list-style-type: none"> • Ensuring that all IWDA personnel in their department, all contractors they engage and all visitors they invite onto a site comply with this policy and the Safeguarding Code of Conduct, including undergoing the required induction and training • Holding representatives accountable to IWDA’s Child Protection requirements.
The People & Culture (P&C) Manager	<ul style="list-style-type: none"> • Ensuring that all IWDA personnel are adequately inducted, have completed the ACFID Safeguarding module, and signed IWDA’s Safeguarding Code of Conduct. • Implementing and maintaining procedures to ensure child protection: <ul style="list-style-type: none"> ○ safeguarding questions are asked at interviews ○ safeguarding questions are asked during employee reference checks ○ safeguarding questions are asked during performance appraisals ○ criminal record checks are completed. 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. Where police checks aren’t available, Statutory Declarations will be obtained. • Maintaining records of IWDA personnel child protection training • Supporting IWDA personnel reporting in accordance with the Safeguarding Reporting Procedure.
The Director of Systemic Change and Partnerships	<ul style="list-style-type: none"> • Initial risk assessment of organisations and activities to inform child protection policy development • Documented plan for ensuring downstream DFAT funded program partners are meeting the DFAT child protection minimum standards • Ensuring and monitoring IWDA’s program partner compliance with the requirements in clauses 8.5 and 8.6 of this policy. • Ensuring all partnership team members undertake yearly child protection training • Oversight of child protection incident reports that relate to IWDA funded activities • Appointing IWDA Safeguarding Focal Points • The ongoing review and maintenance of this Policy to a standard which is compliant with Australian Government State and Federal, DFAT and ACFID requirements
All representatives of IWDA	<ul style="list-style-type: none"> • Taking individual and collective responsibility to ensure the protection of children at all times • Role modelling awareness, responsibility and self-management • Reading, understanding and complying with this policy and Safeguarding Code of Conduct

	<ul style="list-style-type: none"> • Reporting any allegation, suspicion or disclosure of child abuse, or breach of this Policy or Code of Conduct in accordance with the Safeguarding Reporting Procedure
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8. IMPLEMENTATION

8.1 Awareness raising

This Child Protection Policy is published on the IWDA website.

The Child Protection Policy is required reading as part of induction/ orientation/ pre-briefing processes for all IWDA representatives including employees, volunteers, interns, consultants, contractors, and partnership agreements.

8.2 Code of Conduct

IWDA Safeguarding Code of Conduct communicates expectations about safeguarding conduct, including clear behavioural guidelines and expectations when engaging with children and young people. This includes establishing and maintaining clear professional boundaries designed to prevent harm to children as well as guard against misunderstanding.

IWDA's Safeguarding Code of Conduct must be signed by all IWDA personnel upon commencement of their engagement, all family members who are accompanying IWDA personnel on travel and assignment before they commence such travel, all consultants and contractors, and all personnel of IWDA program partner organisations working on IWDA supported programs as set out in clause 8.6.

8.3 Recruitment and Screening

IWDA have robust practices for recruiting, screening and selecting IWDA personnel. These practices serve to minimise the risk of engaging anyone who poses a risk to children. Practices include:

- assessing all employee, volunteer, contractor and board positions for their level of risk in relation to contact with children.
- promoting IWDA's child safety commitment in job adverts and position descriptions.
- the use of behavioural-based questions for positions identified as working with children, to explore examples of a candidate's past behaviour and experiences and conducting verbal referee checks for successful candidates prior to engagement.
- requiring all IWDA staff, volunteers, contractors, and board directors to undergo a National Police Check from the Australian Federal Police prior to engagement and, where possible, any country where they have lived for more than 12 months over the past 5 years. Where this is not achievable a statutory declaration may be required.
- Completing working with children checks for Australian personnel whose role involves working directly with children.
- requiring applicants to disclose whether they have been charged with child abuse/exploitation offences.

IWDA will not knowingly permit any person to work or have contact with children in the course of IWDA activities if they pose an unacceptable risk to children's safety or wellbeing.

All employment contracts will include an entitlement for IWDA to dismiss, suspend or transfer them to other duties, if they breach the Child Protection Policy or Safeguarding Code of Conduct.

Refer to [IWDA Recruitment and Selection Policy](#).

8.4 Staff training and awareness

All IWDA personnel will receive the following training at a minimum:

- induction / introduction briefing into this Policy and associated procedures.
- induction/ introduction briefing on the Safeguarding Code of Conduct.
- induction/introduction briefing on the Incident Reporting and Compliance procedures.
- additional child protection training or briefing sessions, commensurate to a child safety risk assessment of the engagement, visit or deployment.

Child safeguarding is incorporated into regular performance discussions.

All personnel are expected to participate in annual child protection training to ensure they continue to understand their obligations and responsibilities.

8.5 Risk Management

While it is not possible to completely eliminate all risks of child abuse, IWDA will ensure risks of child abuse are identified, monitored and reasonably mitigated against in the assessment of all our activities.

IWDA will undertake a risk assessment for all program partnerships to identify risks, classify any high-risk activities and document steps being taken to reduce or remove these risks.

Child protection risk assessments for all programs and activities involving children will be undertaken at the program design and proposal stage, form part of regular monitoring and be reviewed at regular reporting intervals.

Any travelling staff are required to have read and declared their understanding of this Policy, the IWDA Preventing Sexual Exploitation Policy, the IWDA Safeguarding Code of Conduct and the IWDA Safeguarding Reporting Procedures. In addition, IWDA require all travelling staff to have completed the IWDA Safeguarding E-Learning Module to ensure they understand safeguarding expectations.

Child protection risks are monitored during program/country visits and included into trip reports. Assessment of child protection is included in end of activity or program evaluations or reviews.

8.6 Program Partners

IWDA requires all program partners meet the minimum standards of child protection when representing or partnering with our organisation.

All program partners will:

- sign IWDA's Safeguarding Code of Conduct and commit to adhering to this Policy. This is renewed every time the Policy or Code is reviewed and updated.
- have child protection clauses included in all program partnership agreements and audits
- have robust recruitment and selection processes for all personnel in contact with children.
- undertake their own risk assessment to determine and manage risk to children.
- have in place their own child protection policy and ensure their personnel have read and understand this policy
- carry out training on child protection for all their personnel.
- Make available accessible information that helps children and their families to understand child protection policies, including how to raise a complaint or concern.

IWDA will provide program partners with the following support to meet these requirements:

- introduction briefing to the program partner regarding this Policy and the IWDA Safeguarding Code of Conduct.

- training that supports program partners' understanding of their obligations under this policy.
- developing a plan for ensuring program partners are meeting the requirements of this Policy.
- providing policy and reporting templates to assist with developing their own policy and reporting processes and systems.

IWDA may terminate a Partnership Agreement if it believes gross misconduct has occurred, or there has been a serious or persistent breach of any of the obligations stated in Partnerships Agreements. This would include any breach of these child protection obligations.

Refer to [IWDA Partnership Agreement template](#)

8.7 Use of Images

IWDA sometimes uses images of or stories about children (and their families) to promote its work. When doing so, IWDA will always prioritise the best interests and protection of children over the opportunity for advocacy and promotion of the agency. Expectations are outlined in our Safeguarding Code of Conduct, which include that IWDA will at all times portray children in a dignified, respectful, and appropriate and that informed consent must always be sought and documented for the use of a child's story or image.

Informed means that the parents of the child are given information in ways that they can understand, that explains how, where and for how long the story, information or image will be used. If required, IWDA will provide examples. If the story or image will be used in online communications, IWDA will explain that images cannot be controlled once they are loaded onto the internet and that they can be viewed by anyone with internet access at any time.

Consent means that the parent or carer provides written or documented agreement that the image or story can be used in the way described. In addition to informed consent, and where appropriate given the aged and development of the child, IWDA will also seek the informed agreement of the child.

No story or image will include identifying information about the child. This includes the child's family name, community, or school name. Local cultural traditions should be assessed regarding restrictions for reproducing personal images. Images should be an honest representation of the context and the facts. IWDA will never identify a child as a survivor of sexual abuse, exploitation, or family violence.

All photographers will be screened for their suitability, including police checks where appropriate and a risk assessment (with the child and their family) will be undertaken prior to the publishing of any information/story about an especially vulnerable child.

When sending images electronically, file labels will not reveal identifying information. All images and information about children will be stored safely and will only be accessed by authorised personnel.

9. REPORTING CONCERNS OR COMPLAINTS.

Anyone can make a complaint or raise a concern to IWDA, including children, young people, their families, staff, volunteers, contractors or partners.

IWDA encourages any person, including to children, to raise concerns or make a complaint.

IWDA requires any IWDA personnel or representative to immediately report any concern, complaint, allegation, suspicion, disclosure or observation of child exploitation or abuse, harmful behaviours, or a breach of this Policy or the Safeguarding code of Conduct. If an incident takes

place and you are unsure of the age of the victim/survivor, and there is a reasonable likelihood they are under the age of 18, you should consider them a child for the purposes of reporting.

Concerns and complaints might include suspicions, allegations, observations, or disclosures about any form of child abuse or exploitation, including physical abuse, sexual abuse, emotional abuse, neglect, grooming (including online grooming), or exposure to family violence. Concerns may also be about IWDA representatives breaching this Policy of the IWDA Code of Conduct.

All complaints or concerns made in good faith will be viewed as being made in the best interests of the child regardless of the outcome. IWDA will ensure that the interests of anyone making a complaint about child abuse in good faith are protected.

Complaints can be made:

- By phone: +61 3 8373 2500
- By email: ethics@iwda.org.au
- Through our website: [Contact Us | IWDA](#)
- By post: Safeguarding Complaint, PO BOX 64, Flinders Lane, Victoria, Australia 8009
- In person to the safeguarding focal point or Program Manager.

In addition, IWDA representatives can inform their supervisor within IWDA at any time in person or via phone, text, email, or other communication.

Children and community members that IWDA works will be provided with information about how to make a complaint.

Refer [IWDA Complaints-Policy](#) and [Complaints Procedure](#)

If IWDA representatives prefer to make a Whistle Blower report, they can do so:

- By phone: +61 3 8373 2500
- By email: ethics@iwda.org.au

Refer: [IWDA Whistle-Blower-Policy](#) and [Whistle-Blower-Procedure](#)

9.1 Anonymity:

When reporting a concern, the reporting person may do so anonymously. People are encouraged to share their identity when reporting a concern, as it will make it easier for IWDA to address the concern, but they are not required to do so. If they do not share their identity, IWDA will assess the disclosure in the same way as if they had revealed their identity. However, there may be some practical limitations in conducting the investigation.

9.2 Confidentiality

Confidentiality is a key principle of reporting and managing complaints and reports about child abuse or exploitation. Anyone making a child protection report to IWDA must comply with the provisions regarding confidentiality. This means that all information about the complaint or report must be kept confidential and only shared with those that need to know and that are authorised to receive information.

9.2.1 Limits of Confidentiality

Information may only be released on a “need to know” basis or when required by Australian or overseas law or when a report to police or child protection authorities is made. Information may also need to be shared to protect children from further harm.

9.3 Responding to concerns or complaints.

Concerns or complaints are managed and reported in accordance with our the [IWDA Safeguarding Reporting Procedure](#), which is aligned with the [IWDA Complaints-Policy](#) and [IWDA Complaints Procedure](#). Each of these provide for confidentiality, objectivity, person and survivor centred approach, and accountability.

All concerns or complaints will be recorded, using the Incident Report template.

Refer: [IWDA Incident Report Form template](#)

The Safeguarding Focal Point will acknowledge receipt of the complaint, inform the complainant about the process and next steps. Complaints made anonymously or without any contact information will not be provided with this notification.

IWDA will complete an initial assessment of the report to assess how serious, complicated, or otherwise urgent the issues are that are raised through the report. This assessment will determine the next steps, which can include resolving and closing or further investigation.

If a complaint is not assessed as warranting a full investigation, the complainant will be notified including the reason for closing out the complaint without an investigation.

Where the initial assessment determines that further investigation is required, a prompt, impartial and appropriate investigation will be undertaken.

Complaints relating to IWDA personnel will be **investigated** by IWDA. If the CEO is implicated in a complaint, then a member of the Executive Leadership Team will manage the report.

Complaints related to IWDA partners, or their personnel will be investigated by the partner or by IWDA depending on the nature of the complaint.

The IWDA investigation process includes:

- Developing an investigation plan, ensuring that, where appropriate, relevant authorities are consulted and involved in its design and implementation to ensure the IWDA workplace investigation does not compromise police or child protection processes.
- Obtaining and protecting evidence, including identifying relevant witnesses.
- Putting the allegations to the subject of complaint.
- Analysing evidence and making findings about the allegations.

The rights and welfare of the child is of prime importance throughout the investigation. Every effort will be made to protect the rights and safety of the child throughout the investigation.

Procedural fairness will be applied when investigating to incidents, concerns or allegation of child exploitation or abuse. Procedural fairness means that:

- the subject of the complaint will be afforded a reasonable opportunity to be heard before any findings are made, or a plan implemented.

- the decision maker should be objective and impartial, with an absence of bias or the perception of bias; and
- any findings made will be based on proper and genuine consideration of the evidence.

9.4 Reporting

9.4.1 Reports to external organisations

IWDA is required to report to DFAT any allegation, suspicion or disclosure of child abuse or exploitation within defined timelines. These are outlined in the Safeguarding Reporting Procedure.

IWDA may be required to report to other donors or partners, in line with their contractual obligations.

9.4.2 Reports to authorities or organisations

IWDA may report to relevant child protection or welfare authorities and/or the police.

Reporting to child protection (or similar) authorities occurs when the report relates to child abuse or exploitation in the child's family.

Most countries, including Australia, have legislated requirements for reporting child abuse to child protection agencies. For example, each Australian state and territory have legislated requirements for the reporting of child abuse to departments of child protection. IWDA will comply with relevant legislation unless it is not safe to do so.

Reporting to police occurs when there is any suspicion that a crime may have occurred unless it is not safe to do so.

IWDA will complete a risk assessment to assess safety for the complainant, the child, and the subject of the complaint ahead of external reporting to authorities. The best interests of the child, balanced with an assessment of ongoing risk, will determine decision making. All decisions will be recorded, including the rationale for the decisions.

9.5 Case closure and Record Keeping

IWDA will report final findings to the complainant, the subject of complaint and other stakeholders, considering privacy, confidentiality, and procedural fairness obligations. During this stage IWDA will also consider what, if any, ongoing supports are required for the complainant or the child or young person (if they are different to the complainant). This may be support that IWDA can offer, or it may include facilitating referrals to other organisations.

Record keeping.

IWDA is committed to making and keeping full and accurate records about all child-safety related complaints. In line with the Safeguarding Reporting Procedure, all child safety complaints and information about the case, investigation, and outcomes will be recorded and stored securely in restricted access folders.

9.6 Escalation of complaint:

If you have already raised a concern or complaint, and are not completely satisfied with IWDA's response then you can contact the Australian Council for International Development (ACFID) at the address below:

The Australian Council for International Development (www.acfid.asn.au)

Phone: +61 2 6285 1816

Email: main@acfid.asn.au

Mail: Private Bag 3, Deakin ACT 2600

10 MISCONDUCT AND SANCTIONS

All forms of child exploitation or abuse wherever or whenever it occurs, or any breach of this Policy or Code of Conduct will be deemed serious misconduct and potential grounds for termination.

IWDA reserve the right to:

- Refuse employment or terminate any person's employment where an allegation of abuse or threat to a child has been substantiated.
- Dismiss or transfer to other duties personnel who breach IWDA's Safeguarding Code of Conduct.

These terms of employment are included in all employment contracts.

IWDA requires that all staff, volunteers, contractors and board members sign that they have read, understood and agree to abide by this Policy and the IWDA Safeguarding Code of conduct.

Refer IWDA [Cessation of Employment Policy](#).

11 REVIEW AND AMENDMENT

This policy will be reviewed every three years, or as required to ensure it remains compliant with law, relevant and effective. Any changes must be approved by the Board.

IWDA will engage with stakeholders, including staff, volunteers, contractors, partners as well as community members who are impacted by this policy in the review policy.

As part of the review process, IWDA will analyse child protection complaints, incidents and reports to identify any trends or other areas that will help to strengthen the Policy.

Changes to the policy will be communicated to representatives.

12 REFERENCES/RELATED DOCUMENTS

- IWDA Code of Conduct
- IWDA Safeguarding Code of Conduct
- IWDA PSEAH Policy
- IWDA Safeguarding Reporting Procedure
- IWDA Incident Report Form template
- IWDA Complaints Policy
- IWDA Risk Management Policy
- IWDA Delegations Policy
- IWDA Social Media Policy
- IWDA Whistleblower Policy
- IWDA Whistleblower Procedures
- IWDA Internet and Email Policy
- IWDA Recruitment and Selection Policy
- IWDA Cessation of Employment Policy
- IWDA Partnership Agreement template
- IWDA Funding Order template
- Crim Check Police check application forms

- DFAT Child Protection Policy 2017
- ACFID Code of Conduct
- United Nations Convention of the Rights of the Child.
- Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child pornography (2002)
- Optional Protocol to the Convention on the Rights of the Child on the involvement of children in armed conflict
- Geneva Declaration of the Rights of the Child
- International Labour Organization Convention 182 Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour The Royal Commission into Institutional Responses to Child Sexual Abuse (Australian Commonwealth)
- National Principles for Child Safe Organisations (Australia)