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1. PURPOSE

To describe the procedure for implementing the reporting requirements of the:

- IWDA Child Protection Policy
- IWDA Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy
- IWDA Safeguarding Code of Conduct.

This is to ensure that all IWDA Representatives understand and act in accordance with the reporting requirements of each policy.

This Procedure merges and replaces the previous Child Protection Reporting Procedure and PSEAH Reporting Procedure (both retired July 2024).

The procedure is also summarised in annexed flow charts.

2. SCOPE

This procedure applies to all representatives of IWDA, including IWDA personnel (employees, directors, volunteers and contractors), family members accompanying IWDA personnel on travel or assignment, personnel of IWDA program partner organisations and visitors to IWDA project sites.

3. DEFINITIONS

Refer to Safeguarding documents listed above for definitions.

In addition:

Safeguarding Report: an umbrella term used for any concern, complaint, allegation, suspicion, disclosure or observation that is reported to IWDA about:

- any form of child abuse or exploitation
- sexual exploitation, abuse or harassment (SEAH)
- breaches of the Child Protection Policy
- breaches of the PSEAH Policy
- breaches of the Safeguarding Code of Conduct.

Safeguarding Reports can be received through the complaints process, whistle-blower process or through the Child Protection Policy or PSEAH Policy.

Safeguarding Reports can be received internally from IWDA representatives or externally from partners, members of the public, children, or young people.

This procedure outlines the ways that IWDA manages safeguarding reports.

4. WHAT MUST BE REPORTED?

All IWDA representatives must report, to an IWDA representative or Safeguarding Focal Point, any reports that they receive, or any beliefs that they form on reasonable grounds about:

any form of child abuse or exploitation.	any sexual exploitation, abuse or harassment of any person.	any breaches of the PSEAH Policy.	any breaches of the Child Protection Policy.	any breaches of the Safeguarding Code of Conduct.
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- If representatives are unsure about whether or not a report is required, they can seek support from either the IWDA Safeguarding Focal Points (ethics@iwda.org.au) or from the IWDA People and Culture Manager. However, they are not required to seek this support.
- **If the child or victim/ survivor of SEAH requires emergency health care or is at immediate risk of further harm, contact emergency services. Do not delay by seeking advice.**
- Reports can be made to an IWDA staff member verbally, in person or in writing
- An IWDA staff member will complete an IWDA [Safeguarding Incident Report Form](#) (if necessary, on behalf of the incident reporter) within 24 hours of receiving the report
- Alternatively, IWDA representatives can make a formal whistleblower report as per the IWDA [Whistleblower Policy](#).
- Not reporting, or delays in reporting, could be considered a violation of Policy and therefore subject to disciplinary action.

What is a belief on reasonable grounds?

A belief on reasonable grounds is more than suspicion. There must be some objective basis for the belief. However, it is not the same as having proof.

'Believes on reasonable grounds' means that a reasonable person, doing the same work, would have formed the same belief on those grounds. Reasonable grounds may include:

- your own observations of a person or child's behaviour
- when a person or child tells you they, or another person or child, have been harmed
- when you hear about an incident from someone who is in a position to provide reliable information, perhaps a relative, colleague, friend or neighbour of a person or child who is at risk.

It is not expected that representatives have proof about their concerns or the incident that has occurred. Nor is it the responsibility of representatives of IWDA to investigate their concerns, interview other adults or children, or have expertise or conclusive facts.

Representatives of IWDA should ensure they feel equipped and have an awareness of child protection to make a report should they have concerns.

What if I am wrong? All reports made in good faith will be viewed as being made in the best interests of the child or victim/ survivor regardless of the outcomes of any investigation. If in doubt, contact the safeguarding focal points for advice.

Emergency Services

Australia	Emergency Services Phone 000	Fiji	Police Phone 917, 911 or 000 Ambulance Phone 911 or 000
Thailand	Police Phone 191 Tourist Police Phone 1155 Medical and Rescue Phone 1669	Vanuatu	Family Protection Unit Phone: 1111
Timor Leste	Police Phone: 112 Ambulance Phone 331 1044	Samoa	Emergency Services Phone: 911
Cambodia	Phnom Penh Police (24 Hour) Ph: 023 366 841; 023 720 235 Ambulance Phone: 023 724 891	Solomon Islands	Police Phone: 999 Police Family Violence Office Phone 200023 National Referral Hospital Phone: 24452 Gizo Hospital Phone 60224
		PNG	Police Phone 112 Ambulance Phone 110

Representatives should review country specific information about relevant child protection, health, social welfare and emergency services. Refer to [ACFID PSEA Country Mapping](#) for an outline of this information for some countries.

5. ALL SAFEGUARDING REPORTS ARE ACKNOWLEDGED AND RECORDED

All safeguarding reports must be acknowledged and recorded using the IWDA [Safeguarding Incident Report Form](#). These reports are filed in restricted access folders in the Partnerships network folder. Access is restricted to the relevant Program Manager (PM)/ Senior Program Manager (SPM), Focal Point and Director. All risk cases are recorded (without identifying detail) in the Executive Leadership Team risk matrix, which gives visibility to all Directors and the CEO.

Other than recording the report in accordance with this Procedure, reports must be kept confidential and not shared with any other person. Once assessed, IWDA may need to share information about the report with external authorities to comply with the law or to prioritise safety.

6. ALL SAFEGUARDING REPORTS ARE TREATED SERIOUSLY AND RESPONDED TO

This means that:

- 6.1 within 24 hours of receiving the report, the IWDA representative who received the report will notify the CEO, who will notify the Chair of the IWDA Board.
- 6.2 within 24 hours, IWDA Safeguarding Focal Point, in consultation with the IWDA representative who received the initial report, 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.
- 6.3 Based on this initial assessment, the Safeguarding Focal Point will determine if the report can be resolved, or whether the report requires investigation.
 - Allegations relating to an IWDA representative that are assessed to be about alleged child abuse or any form of SEAH, sexual misconduct, breach of the PSEAH or Child Protection Policy or breach of the Safeguarding Code of Conduct will be investigated.
 - If it is determined that the report does not require further investigation, the reason will be explained to the complainant. The complainant will be provided referral information for alternative options to make the complaint and / or obtain advice or support in relation to the nature of their complaint. This will occur within 48 hours of making the determination.
 - If it is determined that the report requires further investigation, Focal Point(s) will:

- assess any immediate risks to safety or wellbeing of the child, young person, victim/ survivor of SEAH or other people involved in the report.
- assess what next steps need to be taken to address and manage risks through the reporting process.
- assess whether the child, young person, or victim/ survivor of SEAH affected by the complaint (or other children, witnesses etc. impacted) require additional support during the reporting process.
- determine what evidence needs to be immediately secured/protected/kept confidential.
- assess whether further information is needed from the complainant in order to properly assess and resolve the complaint.
- determine the involvement of the child or young person, or victim/ survivor of SEAH in the reporting process, including when and how information will be shared with them throughout the reporting process, and how they will be supported.

It is assumed all children and young people are capable of being involved in the complaints process and will be asked about the type of supports they need to participate. During this step, a plan for involving them will be developed. We will be honest and open about the things that children and young people have a control over or a say in, and those where they do not.¹

7. MAKING EXTERNAL REPORTS OR NOTIFICATIONS

7.1 If the report relates to a possible crime:

- and relates to an Australian citizen engaged by IWDA to work overseas, IWDA's Chief Executive Officer will consult with/report to the Australian Federal Police.
- and relates to an Australian citizen engaged by IWDA to work in Australia, IWDA's Chief Executive Officer will consult with/report to the Victorian Police.
- and relates to a non-Australian citizen engaged by IWDA to work overseas, IWDA's Chief Executive Officer will consult with/report to local authorities of the country in which the incident took place.

If the victim/ survivor is an adult, their consent will be sought before making an external report to authorities.

IWDA understands that managing reports about possible criminal offense can be very challenging. Legislation and legal systems in some countries that IWDA operate in may not be in place, fully functioning or trusted. This can result in complex decisions about how to best respond.

As such, in all cases a risk assessment will be conducted to assess safety for the complainant, the victim/ survivor, and the respondent ahead of external reporting to authorities.

The best interests of the child and a victim/ survivor centred approach will be balanced with the assessment of ongoing risk to help determine decisions. All decisions will be recorded, including the rationale for the decisions. Decisions not to report must be authorised by the Chief Executive Officer.

Note: Unless the risk assessment indicates that more harm could occur as a result of reporting, IWDA expects any possible criminal matters involving children to be reported to the authorities. If the report relates to possible criminal offense against an adult victim/ survivor, reports should be in

¹ [nocs-complaint-handling-reference-guide.docx \(live.com\)](#)

line with the victim/ survivor's consent and wishes.

7.2 If the report relates to possible abuse in the family, either family violence or child abuse:

- the matter will be reported to the local child protection or family welfare authority.

If the victim/ survivor is an adult, their consent will be sought to make an external report to authorities.

IWDA understands that managing child abuse, family violence or gender-based violence allegations can be very challenging. Some countries that IWDA operate or partner in may not have legislation or systems that offer protection and support, or these systems may not be fully functioning or trusted. This can result in complex decisions about how to best respond.

As such, in all cases a risk assessment will be conducted to assess safety for the complainant, the victim/ survivor, and the respondent ahead of external reporting to authorities.

The best interests of the child and a victim/ survivor centred approach will be balanced with the assessment of ongoing risk to help determine decisions. All decisions will be recorded, including the rationale for the decisions. Decisions not to report must be authorised by the Chief Executive Officer.

In Australia, PNG and Fiji certain professions are mandated by law to make reports to child protection authorities if they have concerns about child abuse.

For more information about mandated reporting please refer here:

Australia: [Mandatory reporting of child abuse and neglect | \(aifs.gov.au\)](https://www.aifs.gov.au)

Fiji [Child Protection Guidelines for Health Workers in Fiji](#)

PNG [cca1974115.pdf \(paclii.org\)](#)

Note: Unless the risk assessment indicates that more harm could occur as a result of reporting, IWDA expects any concerns about child abuse to be reported whether or not the law requires it.

7.3 If the report relates to a person employed by an IWDA program partner organisation

IWDA's Chief Executive Officer, or their delegate, will, subject to obligations of consent, confidentiality, and risk assessment, discuss the report with the partner organisation's Chief Executive Officer and decide together upon the next steps. These may involve:

- Report to local police or child protection authority
- Report to the Australian Federal Police
- Report investigated by the partner
- Report managed internally if it is not a criminal matter
- No further action taken.

7.4 IWDA will follow and adhere to all donor contractual obligations and notification requirements as they relate to Child Protection, Child Protection Policy non-compliance, SEAH or PSEAH policy non-compliance.

This includes:

- Immediately notifying DFAT (or relevant Managing Contractor) of any reports related to child abuse, exploitation, harm or child protection policy non-compliance of DFAT funded partners.

Child protection notifications are to be completed using the DFAT Child Incident Notification Form [child-](#)

[incident-notification-form.docx \(live.com\)](#) and sent to the DFAT Conduct and Ethics Unit via childwelfare@dfat.gov.au.

- Notifying DFAT of any reports related to SEAH or misconduct in connection with any DFAT funded activities. There are two kinds of notifications required:
 - Mandatory and immediate (**within two working days**) of becoming aware of an alleged incident) reporting by all staff and DFAT partners of any alleged incident of sexual exploitation, abuse or harassment related to the delivery of DFAT business. This includes any alleged incident that poses a significant reputational risk to DFAT. For example, an allegation against a senior staff member of a partner organisation.
 - Mandatory reporting (**within five working days**) by all staff and DFAT partners of any alleged Policy non-compliance; for example, failure to adhere to the PSEAH Policy Minimum Standards or principles.

SEAH notifications are to be completed using the DFAT Incident Notification Form: [seah-incident-notification-form.docx \(live.com\)](#) and sent to seah.reports@dfat.gov.au. Reports can be made by phone on +61 2 6178 5100.

DFAT takes a victim/ survivor centred approach to the reporting of alleged SEAH incidents. Incidents should only be reported where it is safe to do so and where it is in line with the victim/ survivor's wishes. Information that identifies individuals does not need to be reported.

All members of the Executive Leadership Team are authorised to make reports to DFAT and other donors and to delegate to another staff member to report on IWDA's behalf.

8. SAFEGUARDING INVESTIGATIONS

IWDA will conduct a safeguarding investigation of any reports about any alleged child abuse or SEAH, any form of sexual misconduct, or any breaches of the related policies or codes of conduct.

If the report has been shared with authorities, such as the police or child protection, IWDA will seek advice before commencing their workplace investigation. This is to prevent an internal workplace investigation interfering in any way with the investigation of authorities.

Investigations should be undertaken as promptly as is practicable, thoroughly and follow a defined process, including:

- Deciding whether the investigation will be managed internally, or by a suitably qualified external investigator.
- Developing an investigation plan, including an assessment of risk and support needs for all parties involved.
- Obtaining and protecting evidence, including identifying relevant witnesses.
- Interviewing the complainant, the victim/ survivor (if different from the complainant), witnesses and other relevant parties.
- Putting the allegations to the respondent.
- Analysing evidence and making findings about the allegations.

All reports will be investigated professionally, confidentially, and expediently, ensuring procedural fairness. Procedural fairness means that:

- the respondent will be afforded a reasonable opportunity to be heard before any findings are made, or a response plan implemented.
- the decision maker should be objective and impartial, with an absence of bias or the perception of bias.

- any findings made will be based on proper and genuine consideration of the evidence.

Investigation details will be limited to those who have direct input into and are involved in the allegation or incident. If the investigation reveals new information that is of relevance to authorities, this information will be shared in line with confidentiality and informed consent.

IWDA will take all reasonable endeavours to protect the confidentiality of all parties during an investigation, all details of the reporting and investigation process will be kept confidential and only shared with relevant authorities and DFAT as is mandatory.

IWDA will report investigation findings to the complainant, the respondent and other stakeholders, considering privacy, confidentiality, and procedural fairness obligations. This will occur as soon as reasonably practicable following the determination of an investigation outcome.

9. CLOSE AND RECORD OUTCOME

Following the outcome of the investigation, the report will be closed. The report may also be closed following assessment, if it is decided that the report can be resolved without an investigation.

A member of the Executive Leadership Team will determine consequences or sanctions based on the outcome findings of the investigation. Possible consequences are detailed in the Child Protection Policy, PSEAH Policy and Safeguarding Code of Conduct and can include transfer to other duties or dismissal/termination of contract.

During this stage we will also consider what, if any, ongoing supports are required for the complainant or the victim/ survivor (if they are different from the complainant). This may include support provided by IWDA, or it may include facilitating referrals to other support organisations.

9.1 Record keeping

IWDA is committed to making and keeping full and accurate records of all safeguarding reports. Reports and other documentation is filed in restricted access folders in the Partnerships network folder. Access is restricted to the relevant Program Manager and/or Senior Program Manager, Safeguarding Focal Point and Director. All risk cases are recorded (without identifying detail) in the Executive Leadership Team risk matrix, which gives visibility to all Directors and the CEO.

Complaint record forms, external reporting information, incident forms, investigation records, including the investigation plan, evidence, findings, rationale, outcomes, and actions taken will be maintained confidentially and stored securely. Records will be kept even if an investigation does not substantiate a complaint. Records will be kept by IWDA for at least 45 years.

10. REVIEW AND AMENDMENT

The Chief Executive Officer (CEO), with support from the Executive Leadership Team (ELT), is responsible for the administration, revision, interpretation, and application of this procedure.

This procedure will be reviewed every three years by the CEO, in line with the PSEAH and Child Protection Policies, to ensure it remains compliant with law, relevant and effective.

11. REFERENCES/RELATED DOCUMENTS

- IWDA Child Protection Policy
- IWDA PSEAH Policy
- IWDA Safeguarding Code of Conduct
- IWDA Incident Report Form template
- IWDA Code of Conduct
- IWDA Complaints Policy and Procedure
- DFAT Child Protection Policy 2017
- ACFID Code of Conduct
- United Nations Convention of the Rights of the Child.

- IWDA Risk Management Policy
- IWDA Delegations Matrix Policy
- IWDA Social Media Policy
- IWDA Whistleblower Policy and Procedure
- IWDA Internet and Email Policy
- IWDA Recruitment and Selection Policy
- IWDA Cessation of Employment Policy
- IWDA Partnership Agreement template
- IWDA Funding Order template
- CrimCheck Police check application forms
- DFAT Preventing Sexual Exploitation, Abuse and Harassment Policy
- DFAT Preventing Sexual Exploitation, Abuse and Harassment Risk Guidelines
- 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)

12. CHILD PROTECTION REPORTING FLOWCHART – INTERNAL

Who is responsible for making an internal report to IWDA?

All IWDA representatives: employees, volunteers, board members, partners and contractors

What to report?

If you receive a report, or hold any beliefs that you have formed on reasonable grounds about:

- Any form of child abuse or exploitation
- Any breaches of the Child Protection Policy or Safeguarding Code of Conduct

In relation to IWDA business, whether by a representative of IWDA or someone outside of IWDA



When to report?

Immediately (or within 24hrs)

Is the child in imminent danger of serious harm?



Yes

No



If the victim/ survivor is in immediate danger and in Australia: Call 000 and address immediate safety needs.

If the victim/ survivor is in immediate danger and overseas, contact local emergency services and/ or work with IWDA partner to ensure their immediate safety needs are being addressed. This will likely mean ensuring the child has access to immediate medical services that are available in the relevant country.

How to report

Immediately seek advice and support

- Talk to your Line Manager, IWDA Safeguarding Focal Point or CEO, and complete an [IWDA Safeguarding Incident Report Form](#). This must be done within 24 hours.
- Or make a formal whistleblower report as per the [IWDA Whistleblower policy](#) if applicable.
- You can also seek support from the IWDA People & Culture Manager.

What happens next?

The CEO or their nominee will:

- Work with the Safeguarding Focal Point/ your line manager or organisational contact to determine and fulfil any contractual or other legislative reporting requirements as required.
- Initiate internal risk management processes to ensure the safety of the victim/ survivor, clarify the nature of the complaint and commence investigation process (if required)
- Decide, in accordance with legal requirements, whether the matter should be reported to an external authority (such as the police) and, if so, make report as soon as possible. **Immediate reporting to DFAT is mandatory for incidents that occur on DFAT funded projects.**
- Identify whether there are grounds for proceeding with a detailed investigation and, where an investigation is to be undertaken - subject to any necessary clearance from authorities, appoint the investigating officer or team to carry out the investigation.

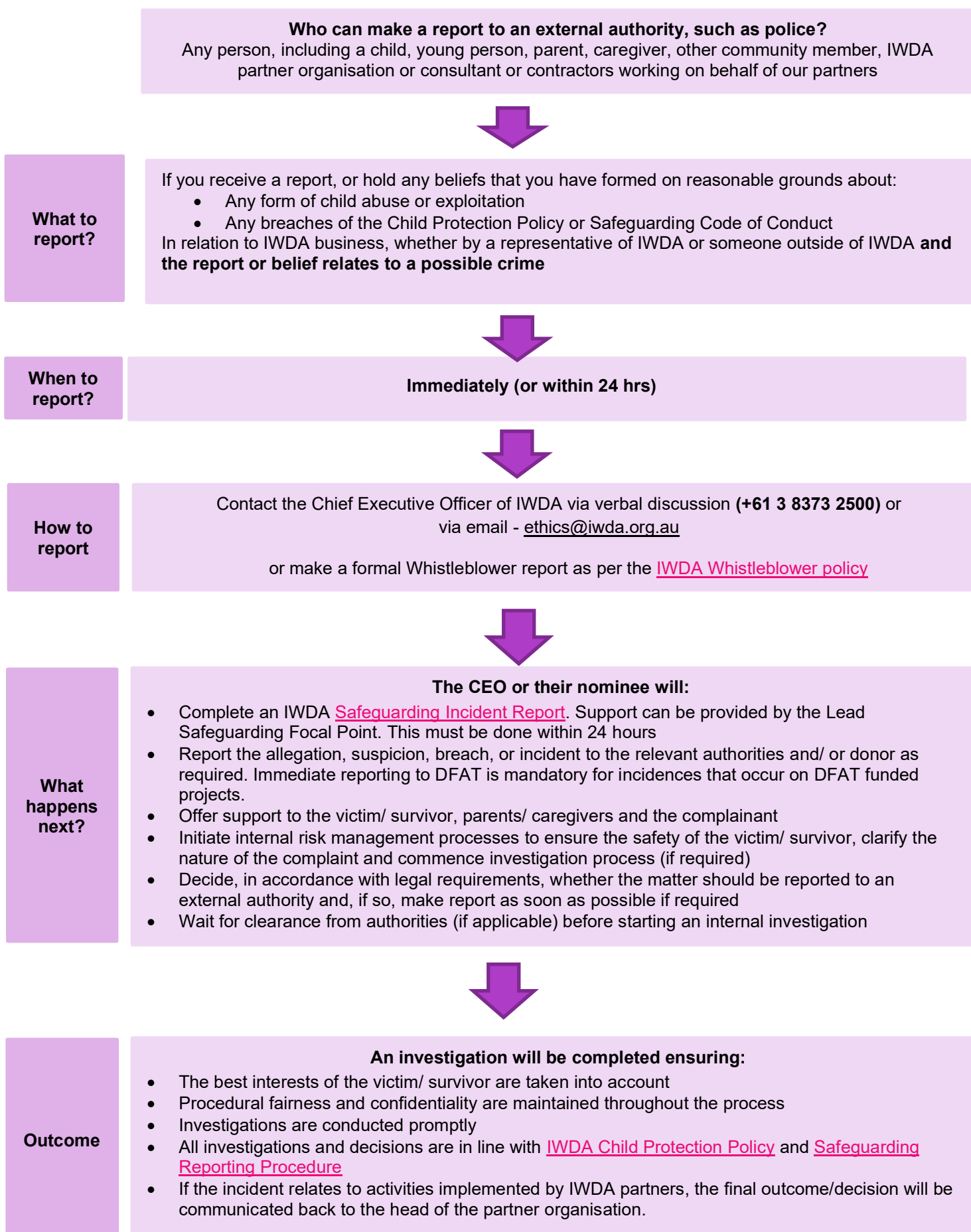


Outcome

An investigation will be completed ensuring:

- The best interests of the victim/ survivor are taken into account.
- Procedural fairness and confidentiality are maintained throughout the process
- Investigations are conducted promptly
- All investigations and decisions are in line with [IWDA Child Protection Policy](#) and [Safeguarding Reporting Procedure](#)
- If the incident relates to activities implemented by IWDA partners, the final outcome/decision will be communicated to the head of the partner organisation.

13. CHILD PROTECTION REPORTING FLOWCHART – EXTERNAL



14. PSEAH REPORTING FLOWCHART - INTERNAL

Who is responsible for making an internal report to a Safeguarding Focal Point?
All IWDA representatives: employees, volunteers, board members, partners and contractors

What to report?

If you receive a report, or hold any beliefs that you have formed on reasonable grounds about:

- Any sexual exploitation, abuse or harassment of any person
- Any breaches of the PSEAH Policy or Safeguarding Code of Conduct

In relation to IWDA business, whether by a representative of IWDA or someone outside of IWD



When to report?

Immediately (or within 24hrs)

Is the victim/ survivor in imminent danger of serious harm?

No



Yes



If the victim/ survivor is in immediate danger and in Australia: Call 000 and address immediate safety needs.

How to report

Immediately seek advice and support

- Talk to your Line Manager, IWDA Safeguarding Focal Point or CEO, and complete an [IWDA Safeguarding Incident Report Form](#). This must be done within 24 hours.
- Report to Director People, Finance & Operations where an incident involves the CEO
- Or make a formal whistleblower report as per the [IWDA Whistleblower policy](#) if applicable.
- You may also seek support from the IWDA People & Culture Manager

If the victim/ survivor is in immediate danger and overseas, contact emergency services or work with IWDA partner to ensure their immediate safety needs are being addressed. This will likely mean ensuring the person has access to immediate medical services that are available in the relevant country.

What happens next?

The CEO or their nominee will:

- Work with the Safeguarding Focal Point/ your line manager or organisational contact to determine and fulfil any contractual or other legislative reporting requirements as required
- Initiate internal risk management processes to ensure the safety of the victim/ survivor, clarify the nature of the complaint and commence investigation process (if required)
- Decide, in accordance with legal requirements, whether the matter should be reported to an external authority (such as the police) and, if so, make report as soon as possible if required. **Reporting to DFAT is mandatory for incidents that occur on DFAT funded projects.**
- Identify whether there are grounds for proceeding with a detailed investigation and, where an investigation is to be undertaken - subject to any necessary clearance from authorities, appoint the investigating officer or team to carry out the investigation.

Outcome

An investigation will be completed ensuring:

- A victim/ survivor centred approach
- Procedural fairness and confidentiality are maintained throughout the process
- Investigations are conducted promptly
- All investigations and decisions are in line with [IWDA PSEAH Policy](#) and [Safeguarding Reporting Procedure](#)
- If the incident relates to activities implemented by IWDA partners, the final outcome/decision will be communicated to the head of the partner organisation.

15. PSEAH REPORTING FLOWCHART - EXTERNAL

