

Child Protection Policy



1. Scope

Sight For All delivers comprehensive, evidence-based, high quality eye health care in Australia and partner countries.

Sight For All is committed to ensuring safety and wellbeing of those it works with, including children.

Sight For All considers child abuse and child exploitation unacceptable in all cases.

Children have the right to be protected and safe from abuse and exploitation.

Sight For All has a zero tolerance to child abuse and exploitation.

Adherence to this policy is a mandatory requirement for all Sight For All personnel.

Sight For All implements risk management strategies, undertakes stringent recruitment activities and adheres to local and international legislative requirements.

This policy applies to Sight For All Board Directors, staff, Visionaries, volunteers, Ophthalmic Country Officers, Fellows, project participants, project partners, consultants, contractors, advisors and their relevant personnel.

2. Commitment

As a child safe organisation, Sight For All makes the following commitments:

- Having a zero-tolerance approach to child abuse and exploitation
- All Sight For All representatives adhering to the organisation's Vulnerable Person's Code of Conduct and this Child Protection Policy at all times
- Not knowingly engaging, either directly or indirectly, anyone who poses a risk to children
- All actions concerning children are undertaken with the best interests of the child as the primary concern
- Adherence to strict recruitment, selection and screening practices for Board Directors, staff, Visionaries, Fellows and project participants
- Provisions included in employee contracts and Visionary engagement documents regarding breaches of the Vulnerable Person's Code of Conduct and Sight For All Child Protection Policy
- Minimising the risks of child abuse and exploitation in all undertakings
- Carefully managing the organisation and projects to identify, mitigate and reduce the risk to children
- Undertaking child protection risk management strategies for all projects
- Conducting child safe training for personnel and ensuring personnel understand their responsibilities to protect children
- Applying procedural fairness when responding to concerns or allegations of child abuse or exploitation
- Organisational representatives adhering to local and international legislative frameworks
- Having clear guidelines on how to respond to concerns and allegations of the safety and welfare of children
- Immediately report any suspected or alleged instances of child abuse following the reporting guidelines outlined in this policy
- Adherence to the ACFID Code of Conduct and Child Protection Policy of the Department of Foreign Affairs and Trade, January 2018
- Reviewing this Child Protection Policy on an annual basis.

3. Guiding Principles

Sight For All activities may involve direct work, indirect work or regular contact with children.

As an organisation working in international development, with vulnerable communities and supporting adults and children with vision impairment or who are blind, Sight For All recognises the importance of a strong commitment to child protection.

Personnel found to be in breach of this Policy, Sight For All's Vulnerable Person's Code of Conduct or who present an unacceptable risk to children may be dismissed, suspended or transferred to other duties.

The guiding principles in the development of this policy include:

- Zero tolerance of child abuse and exploitation
- Recognition of children's best interests
- Responsibility for child protection
- Operating and procedural fairness
- Implementing risk management procedures
- Ensuring all involved with Sight For All are aware of this policy and guidelines.

As such the Sight For All Child Protection Policy is in place to:

- provide a practical guide to the protection of children from abuse
- provide a risk management strategy to prevent child abuse
- protect Sight For All employees and volunteers from unfair processes
- provide a clear guide on what to do if child abuse is suspected

4. Risk Based Approach to the Prevention of Sexual Exploitation, Abuse and Harassment

Sight For All maintains an organisational risk register, reviewed by the Board of Directors twice per year.

Risk Assessments are undertaken for all projects and are reviewed by the Finance, Risk, Audit and Compliance Committee (FRACC) at the commencement of projects.

Capacity Assessments undertaken prior to the commencement of projects examines practices to ensure the protection of children.

Specific child protection risks are identified for all projects. In identifying risks to children, Sight For All asks the question "does the project involve potential contact with children, impact children or involves working with children?" When the answer to this question is yes, risk mitigation strategies are implemented.

Child protection risks are monitored throughout the project with the strategies including monitoring by Visionaries via trip reports, ongoing review by the Ophthalmic Public Health Officer and monthly Operations Meetings.

5. Code of Conduct

Sight For All has a Code of Conduct Policy and Vulnerable Person's Code of Conduct that must be adhered to.

The Vulnerable Person's Code of Conduct is required to be read, acknowledged and signed prior to engagement with Sight For All. The Code of Conduct Policy and Vulnerable Person's Code of Conduct outline the expected behaviours that Board Directors, staff, Visionaries, Fellows, volunteers and partner organisations are required to display at all times.

Failure to comply with the Code of Conduct Policy and Vulnerable Person's Code of Conduct may result in disciplinary action, restriction of duties, termination of services, legal action or criminal investigation.

6. Responsibilities

Sight For All is responsible for:

- Undertaking risk assessments of activities to ensure risks to children are identified and managed
- Implementing child protection safeguards that are in keeping with the minimum child protection standards including appropriate recruitment, screening and employment practices
- Ensuring personnel are trained in child protection awareness and understand their obligation to protect children in carrying out work
- Having clear and internal reporting mechanisms and procedures for personnel to report concerns
- Immediately reporting any suspected or alleged instances of child abuse, exploitation, harm or Child Protection Policy non-compliance to the Executive Officer for reporting to the Conduct and Ethics Unit via childwelfare@dfat.gov.au
- Sight For All Board Directors are responsible for reviewing this policy on an annual basis
- The Sight For All Executive Officer is responsible for implementing the policy and ensuring the recruitment practices outlined in this document are undertaken
- The Executive Officer is responsible for ensuring appropriate training in child protection is provided for all involved
- The Ophthalmic Public Health Officer is responsible for undertaking risk assessments and including specific child protection risks for projects
- The Finance Office Coordinator is responsible for ensuring police checks are received for all Sight For All personnel and checking personnel against required consolidated lists.

7. Child Protection Officer

The Sight For All Child Protection Officer is the Executive Officer. The Executive Officer holds responsibility for promoting child protection, coordinating training, monitoring compliance and answering any queries.

The Sight For All Board of Directors supports the Executive Officer in undertaking training so as to remain abreast of child protection information on an ongoing basis.

8. Recruitment Practices

All those involved with Sight For All including Board Directors, staff, Visionaries, Fellows and project participants are required to provide a National Police Clearance and are checked against the DFAT Consolidated list, Attorney General's Department List of Terrorist Organisations, World Bank Listing of ineligible firms and individuals and Asian Development Bank Sanctions List.

All are required to read and understand Sight For All's suite of policies and procedures, including the Code of Conduct Policy, Prevention of Sexual Exploitation, Abuse and Harassment Policy and sign the Vulnerable Person Code of Conduct.

Job descriptions are in place for all staff, Lead Visionaries and specific volunteer appointments.

Face to face interviews and referee checks are always conducted.

A clause regarding expectations for child protection is included in staff contracts.

Visionary and Fellow's duties are outlined in their respective handbooks.

Visionaries, Fellows and project partners are personally recommended to participate in Sight For All projects. Sight For All does not permit any personnel to work with children if they pose an unacceptable risk to children's safety or wellbeing.

9. Training of Personnel

All Sight For All Board Directors, staff, Visionaries, Fellows and project partners receive a copy of this Child Protection Policy upon engagement with Sight For All.

All Sight For All personnel are required to read and sign the Vulnerable Person's Code of Conduct upon engagement and prior to mobilisation in-country.

Visionaries are provided with information about child protection in the Visionary handbook and via a video induction to be watched prior to mobilisation.

The Executive Officer or Country Officer deliver workshops on good development practices, including child protection to all Fellows and project participants. These workshops are delivered upon project commencement and on an annual basis thereafter.

Visionaries are aware of specific risk assessments for projects via Project Management Plans.

10. Reporting Processes

All concerns or allegations of child abuse and exploitation must be reported immediately. Sight For All takes all reports and concerns seriously and acts on them immediately.

In investigating concerns or allegations of child abuse or exploitation, Sight For All ensures that principles of natural justice will prevail.

The process to report an allegation of suspected or actual child abuse or exploitation is:

Who can make a report?	Sight For All personnel and representatives Child or young person Adult
What should be reported?	Any allegation from a child, adult or Sight For All representative regarding harm, abuse or exploitation of a child. Any suspected breaches of Sight For All's Child Protection Policy, DFAT Child Protection Policy, Sight For All Vulnerable Person Code of Conduct or the ACFID Code of Conduct. Any observation of concerning behaviour exhibited by Sight For All representatives that may breach Sight For All's Child Protection Policy, DFAT Child Protection Policy, Sight For All Vulnerable Person Code of Conduct or the ACFID Code of Conduct. Any observation of inappropriate taking of children's photographs, or use of inappropriate photographs including child pornography
When should it be reported?	Reports and/or concerns are to be made immediately and within a 24 hour period of becoming aware of an alleged incident.
Who should it be reported to?	Sight For All Executive Officer – 0400 249 709 Sight For All Chairman – 0419 977 509 Conduct and Ethics Unit via childwelfare@dfat.gov.au For further general information on child protection or child abuse contact DFAT's Child Protection Officer on +61 6178 5100 or childprotection@dfat.gov.au
How should the report be made?	Reports can be made verbally initially and are then required in writing. Reports of abuse are to be made using the Sight For All Reporting Form for suspected cases of child abuse or mistreatment.
What are the next	Sight For All will conduct a preliminary assessment of the situation

<p>steps?</p>	<p>and determine whether on the basis of the information at hand there has been a criminal act or a breach of code of conduct.</p> <p>If it is clear that a crime has been committed, it will be reported to the appropriate law enforcement authorities and consideration given to whether any administrative investigation will be postponed.</p> <p>If there has been a breach of the code of conduct, then a formal internal investigation process will be undertaken by the Sight For All Board of Directors:</p> <ul style="list-style-type: none"> - Gather and study background material and documentary evidence - Interview complainant - Interview victims if different from above - Interview witnesses if they exist - Interview subject of complaint - Write investigation report - Conclude the investigation with recommendations
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11. Use of Children's Images

Sight For All will always portray children in a way that complies with local traditions, presents children in a dignified manner and is an honest representation of the facts.

In displaying images of children, Sight For All will adhere to the DFAT Child Protection Policy, ACFID Code of Conduct and ACFID Fundraising Charter.

Those taking photographs and sharing stories about Sight For All, do so within the guidelines of Sight For All's Fundraising Policy, Published Material Quality Assurance Procedure and Personal Image Consent Procedure.

When photographing or filming a child for work related purposes, Sight For All personnel must:

- Before photographing or filming a child, assess and endeavour to comply with local traditions or restrictions for reproducing personal images
- Before photographing or filming a child, obtain consent from the child or a parent or guardian of the child. This includes explaining how the photography or film will be used
- Ensure photographs, films, videos and DVD's represent children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive
- Ensure images are an honest representation of the context and facts
- Ensure file labels do not reveal identifying information about a child when sending images electronically
- Hard copies and scanned copies of consent forms are kept at Sight For All head office,

Sight For All's Personal Image Consent Procedure and Photographic Consent Record Procedure outline specific requirements in the taking and storage of photographs of children.

12. Related Documents

Sight For All Police Check Policy

Sight For All Code of Conduct Policy

Sight For All Prevention of Sexual Exploitation, Abuse and Harassment Policy

Sight For All Personal Image Consent Procedure

DFAT Child Protection Policy April 2019

Sight For All Incident Investigation and Reporting Policy

Sight For All Reporting Form for suspected cases of child abuse or mistreatment

ACFID Code of Conduct (www.acfid.asn.au/code-of-conduct)

13. Review

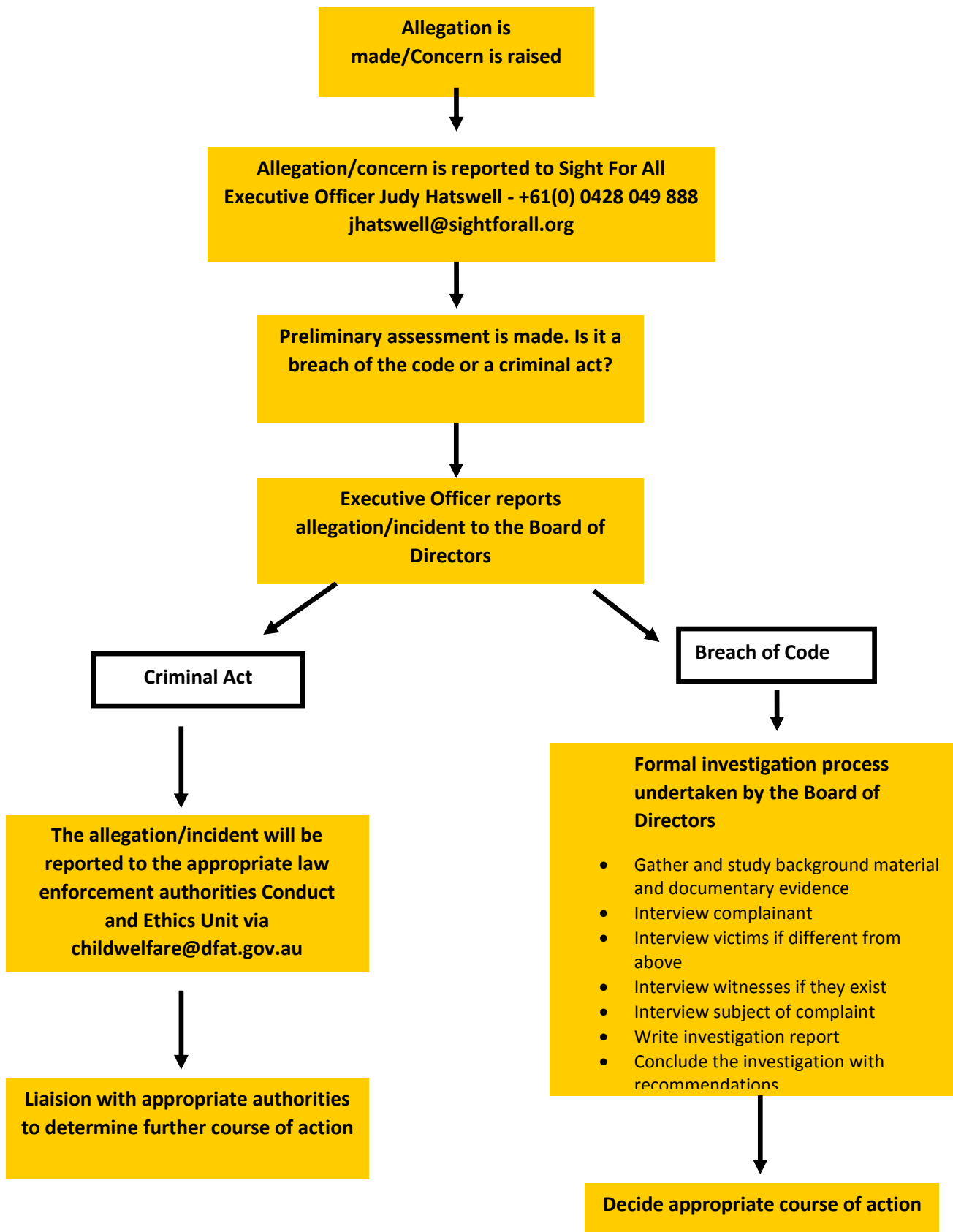
The Sight For All Child Protection Policy is reviewed on an annual basis.

Sight For All Child Protection Policy 2019
Approved by the Board of Directors 28.5.2019
Version 7.0

Addendum A

Child Protection Reporting Process

The process is to be followed in responding to report of concern:



Addendum B Definitions

Abuse	<p>Physical Abuse The use of physical force against a child that results in harm to the child. Physically abusive behaviour including shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning.</p>
	<p>Neglect The failure by a parent or caregiver to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and wellbeing.</p>
	<p>Emotional Abuse Refers to a parent or caregiver's inappropriate verbal or symbolic acts toward a child, or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child's self-esteem or social competence.</p>
	<p>Sexual Abuse The use of a child for sexual gratification by an adult or significantly older child or adolescent. Sexually abusive behaviours can include fondling genitals; masturbation; oral sex; vaginal or anal penetration by a penis, finger or any other object; fondling breasts; voyeurism; exhibitionism; and exposing the child to, or involving the child in, pornography.</p>
	<p>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 of behaviour towards a child.</p>
Child or children	<p>In accordance with the United Nations Convention on the Rights of the Child, 'child' means every human being under the age of 18 unless under the law applicable to the child, majority is attained earlier. For the purposes of this policy, Sight For All considers a child to be a person under the age of 18 years.</p>
Child exploitation	<p>One or more of the following:</p> <ul style="list-style-type: none"> - 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 Pornography	<p>In accordance with the Optional Protocol to the Convention in the Rights of the Child, 'child pornography' means 'any representation, by whatever means, of a child engaged in real or stimulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes.' For further information about child pornography offenses refer to</p>

	the Criminal Code Act 1995.
Child Protection	An activity or initiative designed to protect children from any form of harm, particularly that arising from child exploitation and abuse.
Child Safeguarding	The broad obligation on staff and partners to ensure that the design and delivery of Sight For All projects and organisational processes do not expose children to adverse impacts, including the risk of abuse and exploitation, and that any concerns about children's safety within the communities where Sight For All works is appropriately reported.
Contact with children	Working on an activity or in a position that involves or may involve contact with children, either under the position description or due to the nature of the working environment.
Personnel	Personnel are either employed by Sight For All, engaged by Sight For All on a contractual basis, or engaged by Sight For All on a voluntary or unpaid basis. Personnel includes Board Directors, staff, Visionaries, volunteers, Fellows, project participants, Ophthalmic Country Officers.
Working with children	Working with children means being engaged in an activity with a child where the contact would reasonably be expected as a normal part of the activity and the contact is not incidental to the activity. Working includes volunteering or other unpaid works.
Sexual Exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from sexual exploitation of another.
Sexual Abuse	The actual or threatened physical intrusion of a sexual nature, whether by force or under physical or coercive conditions. It covers sexual offences including but not limited to: attempted rape (which includes attempts to force someone to perform oral sex; and sexual assault (which includes non-consensual kissing and touching). All sexual activity is with someone under the age of consent (in the law of the host country or under Australian Capital Territory law [16 years], whichever is greater) is considered to be sexual abuse.
Sexual Harassment	A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favours, or engages in other unwelcome conduct of a sexual nature, in circumstances in which a reasonable person, having regard to all the circumstances would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated. Sexual harassment can take various forms. It can be obvious or indirect, physical or verbal, repeated or one-off and perpetrated by any person of gender towards any person of any gender. Sexual harassment can be perpetrated against beneficiaries, community members, citizens, as well as staff and personnel.
Transactional Sex	The exchange of money, employment, goods or services for sex, including sexual favours.
Victim/Survivor	A person who is, or has been, sexually exploited, harassed or abused.

Addendum C Relevant Legislation

Relevant Australian legislation

Under Commonwealth law an Australian citizen or resident can be prosecuted for an offence committed against a child in another country under laws that have an extra territorial application.

Commonwealth legislation

Division 272 (child sex offences outside Australia)

Division 273 (offences involving child pornography material or child abuse material outside Australia)

Division 474 (telecommunications offenses, subdivision C)

The Crimes Act 1914 sets out the laws that govern the way legal proceedings under the Criminal Code Act 1995 are conducted, including the conduct of investigations and the protection of children involved in proceedings for sexual offences (under Part 1AD).

Local legislation

Most countries that Sight For All works in have legislation relating to child exploitation and abuse.

When working in-country, Sight For All personnel are required to abide by local legislation, including labour laws about child labour.

State and Territory child protection legislation

State/Territory	Legislation	Source
New South Wales	Child Protection (Working with Children) Act 2012	www.legislation.nsw.gov.au
Victoria	Working with Children Act 2005	www.legislation.vic.gov.au
Queensland	Commission for Children and Young People and Child Guardian Act 2000	www.legislation.qld.gov.au/OQPCHome.htm
Western Australia	Working with Children (Criminal Record Checking) Act 2004	www.slp.wa.gov.au/statutes.nsf.default.html
South Australia	Children's Protection Act 1993	www.legislation.sa.gov.au
Tasmania	Education and Care	www.thelaw.tas.gov.au

	services National Regulations 2011: Education and Care Services National Law (Tas)	
Australian Capital Territory	Working with Vulnerable People (Background Checking) Act 2011 Children and Young Persons Act 2008	www.legislation.act.gov.au
Northern Territory	Care and Protection of Children Act 2007	www.nt.gov.au/dcm/legislation/current.html

International child protection instruments that Australia is a signatory to

Instrument	Source
The United Nations Convention on the Rights of the Child	www.unicef.org/crc
Optional Protocol to the United Nations Convention of the Child on the sale of children, child prostitution and child pornography	www.unhcr.org/refworld/docid/50b353232.html
Optional Protocol to the United Nations Convention on the Rights of the Child on the involvement of children in armed conflict.	www.unhcr.org/refworld/docid/47fdb180.html
Geneva Declaration on the Rights of the Child	www.un-documents.net/gdrc1924.htm
International Labour Organisation Convention 182 Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour	www.ilo.org/ilolex/english/convdisp1.htm