

# Child Protection Policy



## 1. Intent

Sight For All delivers comprehensive, evidence-based, high quality eye health care in Australia and partner countries. 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. In this policy, Sight For All considers a child to be a person under the age of 18 years.

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

Sight For All is committed to ensuring the safety and well-being of those it works with, including children. Some Sight For All projects have a focus on children, such as paediatric ophthalmology activities. Training in other sub-specialty areas may also involve the treatment of children. Sight For All's Child Protection Policy applies in all cases, with additional focus for projects involving child health. Sight For All also builds on DFAT's nine minimum child protection standards.

Adherence to this policy is a mandatory requirement for all Sight For All personnel and representatives. Sight For All implements risk management strategies, undertakes stringent recruitment practices and adheres to local and international legislative requirements.

## 2. Scope

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 involved with activities in Australia and overseas. Sight For All acknowledges that Fellows, project participants and project partners are often public servants employed by Government. Sight For All further acknowledges that the laws and operating contexts for child safeguarding differ across countries. At a minimum, Sight For All will comply with the laws in Australia (including extra-territorial laws) and the laws in countries where we operate.

## 3. Compliance

Sight For All has this Child Protection Policy in place to ensure good development practices that are aligned with the organisation's principals and international human rights conventions. Sight For All is also required by the Australian Government to have a Child Protection Policy in place that meets DFAT's nine minimum standards. In ensuring child protection, this policy and Sight For All's practices are also in keeping with the United Nations Conventions on the Rights of the Child, the Child Protection of the Department of Foreign Affairs and Trade, January 2018 and the ACFID Code of Conduct. This Sight For All Child Protection Policy is reviewed on an annual basis.

## 4. Commitment

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

### 4.1 Having a zero tolerance approach to child abuse and exploitation

- Sight For All Board Directors, staff, Visionaries, volunteers, Ophthalmic Country Officers, Fellows, project participants, project partners, consultants and contractors are required to adhere to the Code of Conduct Policy, Vulnerable Person's Code of Conduct and this Child Protection Policy. Sight For All has an unbreakable commitment to preventing an individual from working with children if a risk is posed.

### 4.2 Best interests of the child

- Sight For All is committed to upholding the rights of the United Nation's Convention on the Rights of the Child. Sight For All fully recognises that children with a disability, including blindness or visual impairment are particularly vulnerable.

- All actions concerning children are undertaken with the best interests of the child as the primary concern. Sight For All will not knowingly engage, either directly or indirectly anyone who poses a risk to children.

#### **4.3 Awareness and Management of Risks**

- While elimination of all risks of child exploitation and abuse cannot be realistically achieved, Sight For All is committed to minimising the risks of child abuse and exploitation in all undertakings. Sight For All will carefully manage the organisation and projects to identify, mitigate and reduce the risks to children. Sight For All undertakes child protection risk management strategies for all projects.

- Initial Screening for Risk Context

Sight For All uses the three steps as outlined in the DFAT Child Protection Risk Assessment Guidance to establish the child protection risk context.

Step 1 – Does the activity involve working with or contact with children?

Step 2 – Is the organisation child-focused and what child protection controls are currently in place?

Step 3 – Based on the outcomes of steps 1 & 2, determine the child protection risk context. Is an assessment of child protection risk required? Does the organisation need to apply all or some of DFAT’s nine minimum standards? These steps are undertaken as part of the capacity assessment for all Sight For All projects.

#### **4.4 Child Safety Responsibilities**

- Sight For All Board Directors, staff, Visionaries, volunteers, Ophthalmic Country Officers, Fellows, project participants, project partners, consultants and contractors share responsibility to ensure the protection of children. Sight For All Board Directors, staff, Visionaries, volunteers, Ophthalmic Country Officers, Fellows, project participants, project partners, consultants and contractors are provided with a copy of this policy to be read and signed upon their engagement and when the policy is updated.
- While Fellows, project partners and project participants are required to abide by their own Government requirements, Sight For All does require them to read and sign their understanding of this policy.
- This Child Protection Policy is shared as part of Head Agreements and Project Agreements.
- Sight For All has recruitment, selection, screening and training practices that are outlined further in this policy.

#### **4.5 Reporting and Procedural Fairness**

- Through this policy, Sight For All provides clear guidelines on how to respond to concerns and allegations of the safety and welfare of children.
- Any suspected or alleged instances of child exploitation and abuse are to be immediately reported following the reporting guidelines as outlined in this policy.
- Sight For All will apply procedural fairness when responding to concerns or allegations of child abuse and exploitation.

### **5. Recruitment Practices**

Sight For All aims to recruit the safest and most suitable people to undertake positions of Board Directors, staff, Visionaries, volunteers, Fellows and project participants. Sight For All will not knowingly engage, either directly or indirectly, an individual who poses an unacceptable risk to children. By implementing child safe recruitment and screening practices, Sight For All can create and maintain a child safe environment and keep children safe in the delivery of our programs and activities. Table A below outlines the specific requirements for recruitment and screening of Board Directors, staff, Visionaries, volunteers, Ophthalmic Country Officers, consultants and contractors. The table also outlines the requirements for Fellows, project participants and partners.

Position	Requirement															
	Criminal Record Check on engagement and updated every 2 years	Working with Children Check	Sign Sight For All Code of Conduct	Sign Sight For All Vulnerable Person's Code of Conduct	Sign Sight For All Child Protection Policy	Sign Sight For All PSEAH Policy	Provide copy of CV	Interview	Referee Checks	Checked against sanctions lists	Good Development Practice Workshop attendance	Job and Person Specification	Signed Agreement	AHPRA Registration	ACFID Code of Conduct Workshop	Noted recommendation for position
Board Director	✓	✓☀	✓	✓	✓	✓	✓	✓		✓	✓				✓	✓
Staff Member	✓	✓☀	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓			✓	
Visionary	✓	✓☀	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓
Volunteer	✓		✓	✓	✓	✓	✓	✓		✓	✓	✓				
Ophthalmic Country Officer	✓	✓☀	✓	✓	✓	✓	✓	✓		✓	✓	✓				✓
Fellow/Project Participant	✓		✓	✓	✓	✓	✓			✓	✓		✓			✓
Project Partner/Hospital Director	✓		✓	✓	✓	✓	✓			✓	✓		✓			
Consultant	✓	✓☀	✓	✓	✓	✓	✓			✓			✓			
Contractor	✓		✓	✓	✓	✓	✓			✓			✓			
Supplier										✓						

☀ Subject to project requirements and working with children check requirements per country.

**Table A**

Recruitment practices include the provision of national police checks, signing Sight For All's Code of Conduct Policy, Vulnerable Person's Code of Conduct, Child Protection Policy, Prevention of Sexual Exploitation, Abuse and Harassment Policy, and the provision of a CV and checking against sanctions listings.

**Personnel Screening / Criminal Record Checks**

As outlined in Sight For All's Criminal Record Check Policy, it is a requirement of all involved with Sight For All to provide a current Criminal Record Check at their point of engagement with the organisation. Checks are also required to be updated every two years. The Criminal Record Check Policy notes requirements for Working With Children Checks and undertaking checks outside of Australia and instances for when statutory declarations may be required.

**Sanctions Lists**

As noted in **Table A**, all Board Directors, staff, Visionaries, volunteers, Ophthalmic Country Officers, Fellows, project participants, project partners, consultants and contractors are checked against various sanctions lists. These lists include: the DFAT Consolidated List, Attorney General's Department List of Terrorist Organisations, World Bank Listing of Ineligible Firms & Individuals, and Asian Development Bank Sanctions List. These lists are checked at the point of individuals and organisations commencing engagement with Sight For All and on a bi-annual basis thereafter.

**Staff Appointments**

Sight For All has a small staff team, located in the Adelaide office. Sight For All's Country Officers in Cambodia and Myanmar are employed through recruitment agencies in country. All staff employed by Sight For All, whether directly in Adelaide or via agencies in-country, are referee checked and undergo requirements as outlined in **Table A**.

All positions have job and person specifications that include Sight For All's commitment to child protection and expectations of employees. Face to face interviews conducted for employees include behavioural-based questions for all appointments. Three referee checks are conducted, including the applicants most recent manager. The Sight For All referee check template includes a specific child protection question. All Sight For All employees are provided with a fixed term contract. These contracts include a clause outlining expectations for child protection and sanctions for breaching.

**Visionary Appointments**

Sight For All in-country projects and online learning programs are supported by Visionaries. Visionaries are primarily Australian based ophthalmologists. Australian ophthalmic Visionaries are, in most cases, at least partially employed within the public hospital system and all are registered with the Australian Health Practitioner Regulation Agency (AHPRA). Public hospitals require medical professionals to have a current Criminal Record Check and Working With Children Check (WWCC), updated every two years. Maintaining AHPRA registration requires evidence of these documents on an annual basis. Sight For All requires copies of criminal record checks and WWCC for all ophthalmic Visionaries.

Optometry Visionaries working with Sight For All are usually employed in private practice and must also have AHPRA registration. Optometry Visionaries must provide Sight For All with a current Criminal Record Check and WWCC in addition to evidence of their current AHPRA registration.

Where ophthalmologists, optometrists, orthoptists, ophthalmic nurses or scientists residing outside of Australia volunteer as a Sight For All Visionary, a WWCC in addition to a current Criminal Record Check and a relevant government medical regulatory body certificate are to be provided.

Sight For All's Recruitment and Selection Procedure outlines details for the recruitment of and selection of staff, Visionaries and Board Directors.

## 6. Training

All Sight For All Board Directors, staff, Visionaries, volunteers, Ophthalmic Country Officers, Fellows, project participants, project partners, consultants and contractors receive a copy and sign their understanding of this Child Protection Policy, the Sight For All Code of Conduct Policy, Sight For All's Vulnerable Person's Code of Conduct and Sight For All's Prevention of Sexual Exploitation, Abuse and Harassment Policy.

Training in child protection is included as part of Sight For All's Good Development Practice Workshops. Attendance at these workshops is compulsory for Board Directors, staff, Visionaries, volunteers, Fellows and project participants. The workshops are delivered upon commencement and refresher training is undertaken annually. Good Development Practice Workshops include a comprehensive presentation on child protection. Topics covered include responsibilities, reporting processes, assessing risks, mitigation strategies and sanctions. The workshop includes delivery of information and incorporates scenarios. Additional training is identified and coordinated as required. Where possible, Sight For All will also work to strengthen the understanding and capacity of partner's child safeguarding.

## 7. Partners

This Child Protection Policy is included as an Addendum to all Head Agreements and Project Agreements in place with partner organisations. At the commencement of projects, Sight For All coordinates a Good Development Practice Workshop. These workshops cover topics including child protection, prevention of sexual exploitation, abuse and harassment, gender equity, disability inclusion and anti-fraud and corruption. The workshop covers the process for reporting suspected incidents and how to make a complaint to Sight For All or the ACFID Code of Conduct Committee. Partner organisations and relevant Directors/staff/project participants will be monitored to ensure they are not in breach of this policy. Monitoring will be proportionate to the arrangement in place with each partner and the risk of the breach.

### **Non-Government Partners**

Sight For All requires non-government partners to maintain their own child protection policies. Instances where partners do not have their own policy, they are required to sign and comply with Sight For All's Child Protection Policy.

### **Government Partners**

Sight For All acknowledges that Fellows, project participants and project partners are often public servants employed by Government. Sight For All further acknowledges that the laws and operating contexts for child safeguarding differ across countries, and that Sight For All is unable to require government employees be bound by this policy. Sight For All and Government partners will work together to ensure that child safeguarding standards are included in partner agreements. This includes reporting arrangements and identification of child safeguarding risks. Partner agreements acknowledge the shared responsibility for identifying, reducing and monitoring risks and reporting suspected safeguarding breaches. Actions that cause Sight For All staff to believe that children are being exposed to significant risk will result in the termination of the agreement with that partner organisation.

Fellows and project participants attend Good Development Practice Workshops at the commencement of projects and on an annual basis. Project Capacity Assessments and Country

Situational Analysis have sections that include review of how the country manages the prevention of sexual exploitation, abuse and harassment.

## **8. Risk Management**

### **Project Level Risks**

An initial project risk assessment is conducted as part of the initiation and concept phase. The risk assessment is re-assessed at the project planning and design phase. Project risk assessments cover child safeguarding risks and include actions and recommendations to mitigate or remove potential risks. Child safeguarding risks are discussed as project risk registers are reviewed at Program Management Committee meetings, with ongoing review conducted by Project/Country Officers.

### **Organisational Level Risks**

Organisational risks are monitored by the Board of Directors on a biannual basis. This includes monitoring of child protection risks. Additionally, the Board of Directors reviews a different section of the risk register in further detail at each meeting. The Executive Officer reports any safeguarding issues or concerns to Board Directors as a standing agenda item at each meeting. Staff have undertaken child protection training through ACFID and all new Board Directors and staff attend a Good Development Practice Workshop at the commencement of their engagement.

## **9. 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 project participants are required to display at all times. In-country Fellows and project participants have demonstrated good English skills and thus understanding of the Code of Conduct. However, additionally it is outlined by the Country Officer upon engagement and as part of Good Development Practice Workshops.

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

## **10. 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. Supporting the Executive Officer and additional points of contact in country are the Cambodian/Lao/Vietnam Country Officer and Myanmar/Mongolia/Sri Lanka Country Officer. 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.

## **11. Reporting Processes**

All concerns, suspicions or allegations of child abuse and exploitation, a breach of this policy or Sight For All's Code of Conduct Policy 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 confidentiality and that the principles of natural justice will prevail. As outlined in the Whistleblower Policy, Sight For All supports those who report suspected incidents of illegal, unethical, fraudulent or undesirable conduct, to do so confidentially and without fear of retribution.

The process to report an allegation of suspected or actual child abuse or exploitation, or breach of this Child Protection Policy is:

<p><b>Who can make a report?</b></p>	<p>Sight For All Board Director, staff member, Ophthalmic Country Officer, Visionary, volunteer, Fellow, project participant, project partner, consultant or contractor. Any member of the general public, including adults, children, young people, carers and guardians.</p>
<p><b>What should be reported?</b></p>	<p>Any observation of concerning behaviour that may breach Sight For All's Child Protection Policy, DFAT's Child Protection Policy, Sight For All's Code of Conduct, Sight For All's Vulnerable Person's Code of Conduct or the ACFID Code of Conduct. Any allegation or disclosure from a child, adult or Sight For All Board Director, staff member, Ophthalmic Country Officer, Visionary, volunteer, Fellow, project participant, project partner, consultant or contractor regarding harm, abuse or exploitation of a child. Any suspected breaches of Sight For All's Child Protection Policy, DFAT's Child Protection Policy, Sight For All's Code of Conduct, Sight For All's Vulnerable Person's Code of Conduct or the ACFID Code of Conduct. Suspicion or allegation of possession or access of child pornography or child exploitation material by a Sight For All Board Director, staff member, Ophthalmic Country Officer, Visionary, volunteer, Fellow, project participant, project partner, consultant or contractor Any observation of inappropriate taking of children's photographs or use of inappropriate photographs including child pornography. A person having committed, been arrested for or convicted of a criminal offense(s) relating to child exploitation or abuse. Any observation of increased risk or harm to children as a result of being involved in Sight For All activities.</p>
<p><b>When should it be reported?</b></p>	<p><b>Reports and/or concerns are to be made immediately and within a 24 hour period of becoming aware of an alleged incident.</b> Anyone can make a report to DFAT. Sight For All requests that, where possible, appropriate reports are made to the Executive Officer, Chairman or Vice Chair in the first instance. The Sight For All Executive Officer, Chairman or Vice Chair will ensure the matter is reported to DFAT within the required 24 hour period.</p>
<p><b>Who should it be reported to?</b></p>	<p>Sight For All Executive Officer – 0400 249 709 or <a href="mailto:jhatswell@sightforall.org">jhatswell@sightforall.org</a> Sight For All Chairman – 0419 977 509 or <a href="mailto:jsmuecke@bigpond.com">jsmuecke@bigpond.com</a> Sight For All Vice Chair – 0418 857 813 or <a href="mailto:cassonrobert@gmail.com">cassonrobert@gmail.com</a> Sight For All Cambodia, Lao, Vietnam Country Officer - +85512200717 or <a href="mailto:cambodiacountryofficer@sightforall.org">cambodiacountryofficer@sightforall.org</a> Sight For All Myanmar, Mongolia and Sri Lanka Country Officer - +959795785914 or <a href="mailto:myanmarcountryofficer@sightforall.org">myanmarcountryofficer@sightforall.org</a> DFAT via <a href="mailto:childwelfare@dfat.gov.au">childwelfare@dfat.gov.au</a> Verbal reports can also be made to Sight For All's Country Officers or Ophthalmic Country Officers where they are not implicated in the breach. Refer to Addendum A for contact details.</p>
<p><b>How should the report be made?</b></p>	<p>Reports can be made verbally initially and are then required in writing. Reports can be made to the EO, Chairman, Vice Chair, Country Officer or OCO as outlined in "Who should it be reported to" above. Reports can initially be made using the accessible form using the link on the Sight For All website via ***** Following that, further details are to be included using Sight For All's Reporting Form for Suspected Cases of Child Abuse or Mistreatment. This form includes details such as:</p> <ul style="list-style-type: none"> <li>- Details of the incident, including statement of facts/dates</li> <li>- Nature of the incident</li> <li>- Details of those involved</li> <li>- Current safety of the child</li> <li>- Details of other organisations/parties involved</li> </ul> <p>Sight For All will ensure appropriate authorities, in Australia and/or partner countries are informed.</p>
<p><b>What are the next steps?</b></p>	<p>Sight For All will conduct a preliminary assessment of the situation 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"> <li>- Gather and study background material and documentary evidence</li> <li>- Interview complainant</li> <li>- Interview victims if different from above</li> <li>- Interview witnesses if they exist</li> <li>- Interview subject of complaint</li> <li>- Write investigation report</li> <li>- Conclude the investigation with recommendations</li> </ul>
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## 12. Sanctions

Where this Child Protection Policy has been breached, the individual will be immediately suspended from their role during the period of the breach investigation, or where there may be a potential risk to a child's safety. Such action is taken as a matter of precaution and does not form evidence of a judgement of guilt. Sight For All believes in natural justice and does not presume guilt or innocence throughout the investigation process. Sight For All will immediately report any breach to DFAT where DFAT funding is involved.

Staff who are suspended during an investigation will continue to receive full pay during the suspension period. The exception is in circumstances of serious misconduct where an individual may be suspended without pay. Such exceptions are made at the discretion of the Board of Directors. Visionaries or volunteers who are stood down during an investigation will be reimbursed for reasonable expenses.

In circumstances of confirmed breaches of this Child Protection Policy, or when, after investigation by appropriate authorities, an individual is found to have put a child at risk, has harmed or has abused a child, will not be permitted to have any further involvement with Sight For All. In cases of an employee in breach of this Child Protection Policy, their employment with Sight For All will be terminated.

## 13. Translation

Key elements of this policy are translated into the local language for dissemination to Fellows, project participants and partners along with the full version of the policy.

## 14. Use of Children's Images

Sight For All portrays 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
- Scanned copies of consent forms are kept in Sight For All's electronic filing system.

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.

## 15. Related Documents

Sight For All Code of Conduct Policy

Sight For All Complaints Handling Policy

Sight For All Criminal Record Check Policy

Sight For All Partner and Capacity Assessment Procedure

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

Sight For All Personal Image Consent Procedure

Sight For All Published Material Quality Assurance Procedure

Sight For All Recruitment and Selection Procedure

Sight For All Reporting and Investigating Incidents, Concerns and Allegations Procedure

Sight For All Termination of Employment Policy

Sight For All Whistleblower Policy

Sight For All Reporting Form for suspected cases of child abuse or mistreatment (Addendum D)

DFAT Child Protection Policy April 2019

DFAT Child Protection Guidance Note Reporting and Notifications January 2018

DFAT Child Protection Guidance Note, Establishing Child Protection Risk Context January 2018

DFAT Child Protection Guidance Note, Recruitment and Screening June 2021

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

ACFID Code of Conduct ([www.acfid.asn.au/code-of-conduct](http://www.acfid.asn.au/code-of-conduct))

## 16. Review

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

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Sight For All Child Protection Policy June 2021

Approved by the Board of Directors

Version 9.0

## ADDENDUM A

### Sight For All contact details

Executive Officer	Mrs Judy Hatswell	0400 249 709	<a href="mailto:jhatswell@sightforall.org">jhatswell@sightforall.org</a>
Chairman	Dr James Muecke	0419 977 509	<a href="mailto:jsmuecke@bigpond.com">jsmuecke@bigpond.com</a>
Vice Chair	Prof Robert Casson	0418 857 813	<a href="mailto:cassonrobert@gmail.com">cassonrobert@gmail.com</a>
Country Officer – Myanmar, Mongolia & Sri Lanka	Dr Ye Win	+959795785914	<a href="mailto:myanmarcountryofficer@sightforall.org">myanmarcountryofficer@sightforall.org</a>
Country Officer – Cambodia, Lao & Vietnam	Mr Sith Sam Ath	+8551200717.	<a href="mailto:cambodiacountryofficer@sightforall.org">cambodiacountryofficer@sightforall.org</a>

## ADDENDUM B

### Child Protection Reporting Process

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



## ADDENDUM C

# Sight For All Vulnerable Persons Code of Conduct



Sight For All has an organisational commitment to the inclusion and protection of those who are vulnerable. This includes both adults and children.

Definitions:

- 'Vulnerable persons' are defined as a people aged under 18 or other individuals who may be unable to take care of themselves or are unable to protect themselves against harm or exploitation.  
<https://www.acnc.gov.au/tools/topic-guides/vulnerable-persons-or-people>
- 'Child' means every human under the age of 18 unless under the law applicable to the child, majority is attained earlier. <https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

The purpose of the Sight For All Vulnerable Persons Code of Conduct is to set out the standards of behaviour that Sight For All expects in the protection of children and vulnerable people.

The Sight For All Vulnerable Persons Code of Conduct applies to all Sight For All Board Directors, employees, medical volunteers (Visionaries), non-medical volunteers, Ophthalmic Country Officers, Fellows, project participants, Eye Unit Directors, contractors, in-country representatives involved with Sight For All projects. It also includes Sight For All supporters attending hospital or clinical sessions.

All parties mentioned above are required to read, sign and abide by this Code of Conduct, in conjunction with Sight For All's Code of Conduct Policy.

### General obligations

I understand that the obligations listed below apply while I am representing Sight For All. This includes while I am in Australia or a partner country, when I am publicly displaying a connection to Sight For All (such as via social media or in wearing branded clothing or name badges) and in situations where I am recognised as a Sight For All representative.

### In signing the Sight For All Vulnerable Persons Code of Conduct I will:

- Conduct myself in a manner consistent with Sight For All's values, Code of Conduct Policy, Child Protection Policy and Protection of Sexual Exploitation, Abuse and Harassment Policy (PSEAH) Policy
- Treat all people (children and adults) with respect regardless of their age, race, colour, gender, language, religion, opinions, nationality, ethnicity, social origin, property, disability or other status
- Not use language or behaviour towards children or adults that is inappropriate, harassing, abusive, sexually provocative, intended to humiliate, demeaning or culturally inappropriate
- Not engage children and/or vulnerable persons in any form of sexual activity or acts, including paying for sexual services or acts
- Not engage anyone unwillingly in any form of sexual activity or acts
- Wherever possible ensuring that another adult is present when working in the proximity of children and /or vulnerable persons
- Not visit a child or vulnerable person's home alone or invite unaccompanied children or vulnerable persons into my home or accommodation, unless they are at immediate risk of injury or harm or in physical danger

- Not sleep close to an unsupervised child, children or vulnerable person unless absolutely necessary, in which case the supervisor's permission must be obtained, and ensuring that another adult is present if possible (noting that this does not apply to an individual's own children)
- Not use any form of physical punishment on children or vulnerable people
- Not to do things of a personal nature that a child or vulnerable person can do for themselves e.g. toileting, dressing or touching children or vulnerable person in an inappropriate way
- Not use any electronic equipment, including computers, mobile phones, video cameras or social media inappropriately and never exploit or harass children or vulnerable people or access other child exploitation material through any medium
- Not hire children or vulnerable people for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury
- Comply with all relevant Australian and local legislation, pertaining to the country in which Sight For All activities are being conducted. This includes during travel and includes labour laws in relation to child labour and the protection of vulnerable people
- Immediately report concerns or allegations of child abuse and exploitation in accordance with the Sight For All Child Protection Policy and any relevant legislative reporting requirements. This includes reporting immediately to Department of Foreign Affairs and trade (DFAT) where DFAT funding is involved
- Use the Sight For All Reporting Form for Suspected Cases of Child Abuse or Mistreatment when making a report
- Immediately report concerns or allegations of sexual abuse or exploitation as outlined in the Sight For All PSEAH Policy. This includes reporting immediately to DFAT where DFAT funding is involved
- Use the Sight For All Reporting Form for Suspected Cases of Sexual Exploitation, Abuse and Harassment when making a report
- Immediately disclose all charges, convictions and outcomes of an offence, which occurred before or occurs during my association with Sight For All that relate to child exploitation or abuse and sexual exploitation and abuse
- Not condone or participate in any child related activity which is illegal, unsafe or abusive
- Not form a physical relationship with another Visionary, Fellow or local person, to avoid any risk of power imbalances
- Not engage in any fraternisation while engaged in direct delivery of DFAT project activities
- Be aware of behaviour and avoid actions or behaviours that could be perceived by others as child exploitation and abuse
- Be aware of behaviour and avoid actions or behaviour that could be perceived by others as sexual exploitation or abuse
- Not abuse my position within Sight For All at the expense of or to the detriment of others.

**Photographing or filming children or vulnerable people and use of images for work-related purposes**

I agree that while working or volunteering with Sight For All or being engaged in Sight For All related activities and when photographing or filming a child or using an image for work-related purposes, I will:

- Gain consent from the child or their parent/guardian of the child prior to taking images, and ensure that they understand how the images will be used
- Have assessed and endeavour to comply with local traditions and restrictions for the reproduction of images
- Ensure that photographs and filming taken depict children and vulnerable people in a dignified and respectful manner and not in a submissive or vulnerable manner. Children will be adequately clothed and not in poses that could be viewed as sexually suggestive
- Ensure that images are an honest representation and related to the work undertaken by Sight For All in the context of the setting

- Ensure that file labels, text relating to images do not reveal identifying information about the child when sending images electronically or using the images in [an](#) form such as publications or social media
- Follow the requirements as set out in the Sight For All Personal Image Consent Procedure and use the Sight For All Personal Image Consent Form.

I have read the Sight For All Code of Conduct, Child Protection, Human Rights, and PSEAH Policies and understand my responsibility to abide by these guidelines at all times to protect myself and the children and vulnerable people I may come into contact with through my involvement with Sight For All. I understand that I must use common sense and avoid actions and behaviours that may be construed as child exploitation, child abuse or sexual abuse and exploitation.

I agree to abide by Sight For All's Code of Conduct Policy and the ACFID Code of Conduct, of which Sight For All is a signatory.

I understand that failure to comply with this code may result in disciplinary procedures, restriction of duties, termination of services, legal action or criminal investigation.

Signature: \_\_\_\_\_

Full Name: \_\_\_\_\_

Date: \_\_\_\_\_

Attachments    Sight For All Child Protection Policy, June 2021  
                      Sight For All Prevention of Sexual Exploitation, Abuse and Harassment Policy (PSEAH), June 2021

Date of Revision – June 2021

## ADDENDUM D

### SIGHT FOR ALL REPORTING FORM FOR SUSPECTED CASES OF CHILD ABUSE OR MISTREATMENT OR POLICY BREACH



*This reporting form is to be used to report violations to Sight For All's Child Protection Policy, Vulnerable Persons Code of Conduct or any child safeguarding concerns. The form is to be completed immediately and within 24 hours of an incident, allegation or concern occurring.*

In emailing this form the subject line should read 'CONFIDENTIAL URGENT EMAIL'. It is to be returned to the Executive Officer, Judy Hatswell via email [jhatswell@sightforall.org](mailto:jhatswell@sightforall.org) or another Sight For All contact person as outlined in Addendum A of the Child Protection Policy.

Name of person completing report: \_\_\_\_\_ Date: \_\_\_\_\_  
Position at Sight For All: \_\_\_\_\_  
Email address: \_\_\_\_\_ Phone number: \_\_\_\_\_

Please **tick** which situation you are reporting on:

- Witnessing an incident of child abuse
- Suspected child abuse
- Has there been an accusation of child abuse
- Has a report of child abuse been made against you
- You are aware that a child has been sexually abused
- You are aware that a child has been emotionally abused
- You are aware that a child has been physically abused
- You are aware that a child has been neglected
- There has been a breach of the Sight For All Child Protection Policy
- There has been a breach of the Sight For All Vulnerable Person's Code of Conduct

#### Details of incident

Date of incident: \_\_\_\_\_ Time of incident: \_\_\_\_\_  
Location of incident: \_\_\_\_\_  
Name(s) of witnesses: \_\_\_\_\_

Description of incident (please describe the sequence of events):

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#### Information about the child

Name of child involved: \_\_\_\_\_  
Child's address: \_\_\_\_\_  
DOB: \_\_\_\_\_ Male  Female   
Parent's name: \_\_\_\_\_ Parent's phone number: \_\_\_\_\_

Do you believe the child is currently safe: Yes  No

Please describe what has been implemented to ensure the child's safety:

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Does the child have a disability: Yes  No

If yes, please provide details of the disability:

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Do you believe the child is:

- Particularly vulnerable Yes  No
- Is traumatised Yes  No
- Has been repeatedly abused Yes  No

Is an interpreter required to communicate with the child and/or their guardian: Yes  No

Are there specific cultural factors to be considered: Yes  No

If yes, what are they:

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Have other organisations been informed of this allegation: Yes  No

If yes, list the organisations, names and contact details of who you liaised with:

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**Information about the person against whom the allegation has been made (if known)**

Name: \_\_\_\_\_ Male  Female

Relationship to the child: \_\_\_\_\_

Relationship to Sight For All: \_\_\_\_\_

Contact details: \_\_\_\_\_ Employer: \_\_\_\_\_

Are you aware of the person against whom the allegation has been made, has been confronted with the allegations:

Yes  No  If yes, detail the conversation:

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Please detail any further information you would like to provide:

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Signature of person completing the report: \_\_\_\_\_ Date: \_\_\_\_\_

Signature of Executive Officer/Chairman/Country Officer: \_\_\_\_\_ Date: \_\_\_\_\_

**ADDENDUM E**  
**Definitions**

<b>Abuse</b>	<p><b>Physical Abuse</b> 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><b>Neglect</b> 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><b>Emotional Abuse</b> 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><b>Sexual Abuse</b> 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><b>Ill-treatment</b> 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>
<b>Child or children</b>	<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>
<b>Child exploitation</b>	<p>One or more of the following:</p> <ul style="list-style-type: none"> <li>- Committing or coercing another person to commit an act or acts of abuse against a child</li> <li>- Possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material</li> <li>- Committing or coercing another person to commit an act or acts of grooming or online grooming</li> <li>- Using a minor for profit, labour, sexual gratification, or some other personal or financial advantage</li> </ul>
<b>Child Pornography</b>	<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 the Criminal Code Act 1995.</p>

<b>Child Protection</b>	An activity or initiative designed to protect children from any form of harm, particularly that arising from child exploitation and abuse.
<b>Child Safeguarding</b>	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.
<b>Contact with children</b>	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.
<b>Working with children</b>	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.
<b>Sexual Exploitation</b>	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.
<b>Sexual Abuse</b>	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.
<b>Sexual Harassment</b>	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.
<b>Transactional Sex</b>	The exchange of money, employment, goods or services for sex, including sexual favours.
<b>Victim/Survivor</b>	A person who is, or has been, sexually exploited, harassed or abused.

## ADDENDUM F 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	<a href="http://www.legislation.nsw.gov.au">www.legislation.nsw.gov.au</a>
Victoria	Working with Children Act 2005	<a href="http://www.legislation.vic.gov.au">www.legislation.vic.gov.au</a>
Queensland	Commission for Children and Young People and Child Guardian Act 2000	<a href="http://www.legislation.qld.gov.au/OQPChome.htm">www.legislation.qld.gov.au/OQPChome.htm</a>
Western Australia	Working with Children (Criminal Record Checking) Act 2004	<a href="http://www.slp.wa.gov.au/statutes.nsf.default.html">www.slp.wa.gov.au/statutes.nsf.default.html</a>
South Australia	Children's Protection Act 1993	<a href="http://www.legislation.sa.gov.au">www.legislation.sa.gov.au</a>
Tasmania	Education and Care services National Regulations 2011: Education and Care Services National Law (Tas)	<a href="http://www.thelaw.tas.gov.au">www.thelaw.tas.gov.au</a>

Australian Capital Territory	Working with Vulnerable People (Background Checking) Act 2011 Children and Young Persons Act 2008	<a href="http://www.legislation.act.gov.au">www.legislation.act.gov.au</a>
Northern Territory	Care and Protection of Children Act 2007	<a href="http://www.nt.gov.au/dcm/legislation/current.html">www.nt.gov.au/dcm/legislation/current.html</a>

International child protection instruments that Australia is a signatory to

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