SAFEGUARDING POLICY

SIGHT FOR ALL
TEACHING THE WORLD TO SEE

1. Scope

Sight For All is committed to protecting all involved with the organisation and the activities undertaken.

The Board of Directors takes seriously the responsibility of protecting people from harm, and responding appropriately should the unfortunate event occur that someone is harmed.

This Safeguarding Policy is to be read in conjunction with Sight For All's Child and Young Person Protection Policy and Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy.
The Policy applies to Sight For All Board Directors, staff, Visionaries, contractors, volunteers, Fellows, project participants and project partners.

2. Commitment

Sight For All's commitment to safeguarding includes a zero-tolerance approach to the abuse and exploitation of children and young people, and sexual exploitation, abuse and harassment. Sight For All has a duty of care, takes a survivor centred approach and plays an active role in preventing child and young person exploitation and abuse, and the prevention of sexual exploitation, abuse and harassment.

Adherence to this policy is a mandatory requirement for all Sight For All personnel and representatives. It also applies to downstream partners.

Sight For All is committed to always prioritising the needs and wishes of victim-survivors.

3. Resources

This Safeguarding Policy, along with Sight For All's Child and Young Person Protection Policy and Prevention of Sexual Exploitation, Abuse and Harassment Policy have been developed with guidance from the Department of Foreign Affairs and Trade (DFAT). This includes DFAT's Child Protection Policy September 2025, Protection from Sexual Exploitation, Abuse and Harassment Policy September 2025 and Child and Adult Safeguards Implementation Handbook for Staff and Partners April 2026.

As an agency accredited with the Australian Government's Australian NGO Cooperation Program (ANCP), Sight For All acts in accordance with the policies and the organisation's own policies and regulations.

4. Definitions

Sight For All follows guidance from the Australian Charities and Not-for-profit Commission (ACNC) and DFAT in defining the following:

Safeguarding – protecting the welfare and human rights of people that are connected with the organisation or its work, particularly people that may be at risk of abuse, neglect or exploitation.

Child and Young Person – as noted in Sight For All's Child and Young Person Protection Policy, a child is defined as being 15 years of age or younger and a young person as aged 16 – 17 years.

Child Abuse – includes physical abuse, emotional abuse, sexual abuse, ill treatment, neglect and online or digital abuse. It also includes a child or children witnessing such abuse against another child or adult.

Child Exploitation – includes:

- Committing or coercing another to commit an act or acts of abuse against a child
- Possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material
- Committing an act of grooming, including online grooming

- Using a child for profit, labour, sexual gratification, trafficking, forced labour or another personal or financial advantage.

Sexual Exploitation – any actual or attempted abuse of a person of vulnerability, differential power or trust for sexual purposes. This may include but is not limited to profiting monetarily, socially or politically.

Sexual Abuse – the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes all forms of sexual assault, rape, molestation, and other forms of non-consensual sexual activity.

Sexual Harassment – any unwelcome conduct of a sexual nature that occurs in circumstances in which a reasonable person, aware of those circumstances, would anticipate that the person being harassed might feel offended, humiliated or intimidated. Examples include, but are not limited to, unwelcome physical touching, comments or jokes of a sexual nature, suggestive looks, staring or leering and display or circulation of pornographic material.

Victim-Survivor – a term used to describe a person who is, or who has been, sexually exploited, abused or harassed. The term acknowledges the harm suffered (victim) and the resilience of the individual in coping with the aftermath (survivor).

5. Compliance

Sight For All is committed to good governance at all levels, including the safety of children, young people, adults and those who are vulnerable. As noted throughout this Policy, as an Accredited Agency with the Australian Government's Australian NGO Cooperation Program (ANCP), Sight For All adheres to DFAT's Child Protection Policy September 2025, Protection from Sexual Exploitation, Abuse and Harassment Policy September 2025 and Child and Adult Safeguards Implementation Handbook for Staff and Partners April 2026.

As a DFAT funded agency, Sight For All is required to:

- Adhere to the principles of policies
- Comply with DFAT's mandatory reporting requirements and any mandatory reporting requirements to law enforcement as required by legislation
- Comply with relevant Australian and local legislation
- Take a risk-based approach in applying the child and young person protection and PSEAH standards
- Put controls in place to manage and monitor the risk of child exploitation, abuse and harm and sexual exploitation, abuse and harassment
- Support downstream partners to meet all policy obligations.

Sight For All is a registered charity with the Australian Charities and Not-for-Profit Commission (ACNC) and adheres to the external conduct standards. Sight For All is a member of the Australian Council for International Development (ACFID) and adheres to the ACFID Code of Conduct. Safeguarding is a standard agenda item at Sight For All Board meetings.

6. Implementing DFAT's Five Child Protection and PSEAH Standards

DFAT has five child protection and prevention of sexual exploitation, abuse and harassment standards that are to be met. The standards and how Sight For All adheres to them includes:

1. Policy, Procedures and Code of Conduct
   Sight For All has this Safeguarding Policy, a Child and Young Person Protection Policy, PSEAH Policy, Code of Conduct Policy, and a Vulnerable Person's Code of Conduct. All policies are reviewed by the Board of Directors. They are circulated and required to be adhered to by all representatives, including Board Directors, staff, contractors, Visionaries, volunteers, project participants and project partners.

2. Reporting Mechanisms and Investigation Procedures
   Sight For All's policies detail requirements for reporting abuse and exploitation of children and young people and sexual exploitation, abuse and harassment.

- Any reports of concerning behaviour that may breach Sight For All's Child and Young Person Protection Policy, DFAT's Child Protection Policy, Sight For All's Code of Conduct or Vulnerable Person's Code of Conduct is required to be reported.
  Reporting is also required for any observation of inappropriate taking of children/young person's photographs or use of inappropriate photographs, a person having committed, been arrested for or convicted of a criminal offense(s) relating to child and young person exploitation and abuse and any observation of increased risk or harm to children and young people as a result of involvement in Sight For All activities.
- For sexual exploitation, abuse and harassment mandatory and immediate reporting **within 24 hours** using the Sight For All Suspected Cases of Sexual Exploitation, Abuse and Harassment Form is required. Where a matter relates to DFAT business, it must also be reported to DFAT within 24 hours in accordance with DFAT requirements. The DFAT Sexual Exploitation, Abuse and Harassment Form is to be used when reporting to DFAT.
- **Reports and/or** concerns **are to be made immediately and within a 24-hour period of becoming aware of an alleged incident.** Anyone can make a report to DFAT. Sight For All requests that, where possible, appropriate reports are made to the Organisational Leader, Chair or Vice Chair in the first instance. The Sight For All Organisational Leader, Chair or Vice Chair will ensure the matter is reported to DFAT within the required 24-hour period.

Information about reporting methods is provided within Sight For All's Child and Young Person Protection Policy and PSEAH Policy, via Sight For All representative inductions, as part of Good Development Practice Workshops and in project agreements with partners. Fact Sheets for PSEAH and child and young person protection are translated into several languages and are circulated in country.

Both the Child and Young Person Protection and PSEAH Policies outline the investigation process and sanctions should a breach occur.

In managing and investigating reports and allegations, Sight For All strives to ensure reporting processes are victim-survivor centred and based on a 'do no harm' approach. Confidentiality of reports is also maintained wherever possible.

3. <u>Risk Management Process</u>
   As outlined in Sight For All's Risk Management Policy, Board Directors, the Finance, Risk, Remuneration Audit and Compliance Committee (FRRACC), along with the Organisational Leader manage risk in a way that ensures:
   - Potential risks are identified in terms of the likelihood of its occurrence and what could potentially happen
   - That appropriate controls are identified and put in place to mitigate risks
   - That likely risks are identified in terms of the severity of the consequence if an incident does occur
   - That duty of care for Board Directors, staff, Visionaries, Country/Project Officers, Fellows, project participants and non-medical volunteers is recognised, and strategies are put in place to eliminate risks
   - That stakeholders are communicated with in terms of addressing potential risks and ways to manage risks
   - That risk management is incorporated into the strategic and operational planning process within the organisation.

   Sight For All considers the risk of child and young person exploitation and abuse, and sexual exploitation, abuse and harassment at the organisational, country and project level. Risk assessments are undertaken for all projects and are reviewed throughout the project period. The organisational risk register is reviewed by FRRACC at each meeting and is presented to the Board of Directors for review at each Board meeting.

   Sight For All recognises that there may be potential risks for staff, Visionaries, Fellows and project participants in-country. These may be health-related or hazard-related risks. As such, management plans are in place for each project. A risk management framework is undertaken as part of the project management plan.

In designing projects with partners, the Country Situational Analysis and Partnership and Capacity Assessments are the tools used to establish and assess the risks associated with child protection, PSEAH, gender equity and diversity, disability inclusion, cultural respect and innovation. In managing risks, Sight For All considers five safeguards that are outlined in DFAT's Environmental and Social Safeguard Policy which are: environmental protection, children, vulnerable and disadvantaged groups, displacement and resettlement, indigenous peoples and health and safety.

Sight For All recognises that there may be potential risks for staff, Visionaries, Fellows and project participants in-country. These may be health-related or hazard-related risks. As such, management plans are in place for each project. A risk management framework is undertaken as part of the project management plan. Sight For All takes necessary steps to ensure the safety of representatives in-country and for those we work with. Board Directors, staff, Visionaries, Fellows and project participants are also responsible for identifying potential risks and reporting identified issues.

4. Training

Sight For All has an established Good Development Practice Workshop that is required to be undertaken by all Sight For All representatives including Board Directors, staff, project participants, contractors, volunteers and Visionaries. The Good Development Practice Workshop includes scenarios that are particularly related to the prevention of sexual exploitation, abuse and harassment and the protection of children and young people. An assessment is required to be completed by all following the workshop. Attendance at Good Development Practice Workshops is mandatory for all Board Directors, staff, Visionaries, Fellows and project participants. Refresher workshops are held for projects running longer than 12 months.

Information about the protection of children and young people and the prevention of sexual exploitation, abuse and harassment is included in Head and Project Agreements, with the aim to inform and outline requirements with partners in delivering projects.

Sight For All country and project officers and relevant team members also undertake specific training such as ACFID's Child Protection and International Development online training program.

Child Protection and PSEAH fact sheets are translated in the local language of countries in which projects are being undertaken. These fact sheets are provided in addition to the Child and Young Person Protection and PSEAH policies.

5. Recruitment and Screening Processes

Sight For All aims to recruit the safest and most suitable people to undertake positions of Board Directors, staff, contractors, 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 others.

By implementing robust recruitment and screening practices, Sight For All can create and maintain a safe environment and prevent opportunities for sexual exploitation, abuse and harassment wherever possible.

All those involved with Sight For All including Board Directors, staff, Visionaries, Fellows and project participants are required to provide a National Criminal Record Check 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 the Asian Development Bank Sanctions List.

Sight For All's robust recruitment practices for Board Directors, staff, Fellows and project participants are outlined in detail in the Human Resources Policy. Such practices include that job and person specifications exist for all staff and contractors. A clause regarding expectation for the prevention of sexual exploitation, abuse and harassment and the protection of children is included in staff contracts. Visionaries are required to sign the Visionary Engagement Arrangement and Fellows are required to sign the Fellows Engagement Arrangement.

All representatives are required to read and understand Sight For All's suite of policies and procedures, including the Child and Young Person Protection Policy and PSEAH Policy, and sign the Vulnerable Persons Code of Conduct and Code of Conduct Policy.

7. Sanctions

Where the Child and Young Person Protection Policy or PSEAH 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 or another individual'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 the Child and Young Person Protection Policy or PSEAH Policy, or when, after investigation by appropriate authorities, an individual is found to have put another individual at risk, has harmed or has abused a child or young person, or has sexually exploited, abused or harassed another individual, will not be permitted to have any further involvement with Sight For All. In cases of an employee in breach of the Child Protection Policy or the PSEAH Policy, their employment with Sight For All will be terminated.

8. Related Documents

Sight For All Anti-Fraud and Corruption Policy
Sight For All Code of Conduct Policy
Sight For All Child and Young Person Protection Policy
Sight For All Disability Inclusion Policy
Sight For All Gender Equality Policy
Sight For All Human Resources Policy
Sight For All Human Rights Policy
Sight For All Incident Investigation and Reporting Policy
Sight For All Prevention of Sexual Exploitation, Abuse and Harassment Policy
Sight For All Reporting form for suspected cases of sexual exploitation, abuse and harassment
Sight For All Reporting form for suspected cases of child and young person abuse or mistreatment or policy breach

9. Review

The Sight For All Safeguarding Policy is reviewed on a biennial basis.

Sight For All Safeguarding Policy July 2026
Approved by the Board of Directors
Version 4

Document Revision History		
Document Name	**Version #**	**Date Approved**
Safeguarding Policy	1	17 November 2020
Safeguarding Policy	2	21 September 2021
Safeguarding Policy	3	26 September 2023
Safeguarding Policy	4	28 July 2026