

## Child Safeguarding Policy

Policy Owner	National Human Resource Manager
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Approved by	Markus Bucy, Chief Operating Officer

### Preamble

Disaster Relief Australia (DRA) recognises that children living in areas affected by natural disasters and other humanitarian crises are particularly vulnerable. Therefore, risks to children must always be considered when developing and planning for disaster relief operations and other projects in service to the community, both within Australia and overseas.

DRA is committed to safeguarding the children it helps and who reside in the communities in which we are involved. We recognise that the nature of DRA's work may place our workers in positions of authority and trust in relation to the communities we work with, especially with children.

DRA employees and volunteers have an obligation to uphold high standards of personal and professional conduct at all times and must not abuse this position in order to exploit or abuse another person. They are responsible for maintaining a professional role with children, which means establishing and maintaining clear professional boundaries that serve to protect everyone from misunderstandings or a violation of the professional relationship.

DRA has a zero-tolerance approach to child abuse. We will actively prevent and respond to child protection issues and maintain an organisational culture that prioritises safeguarding against abuse so that it is safe for those affected to come forward and report incidents and concerns with the assurance they will be handled sensitively and appropriately.

## Purpose

This Child Safeguarding Policy has been developed to provide a practical guide to prevent child abuse in DRA's activities. It will outline a range of risk management strategies that will be implemented to reduce the risk of children being harmed. The Child Safeguard Policy will provide guidance on how to respond to concerns and allegations of child abuse. It provides guidance to staff and associates on how to work respectfully and effectively with children. This will provide all stakeholders, including staff and associates with a safe working environment.

## Scope

The following must comply with this Policy in the course of their work and when representing DRA:

- DRA employees, members and board members
- all spontaneous and corporate volunteers coordinated by DRA
- any contractors, members of partnered organisations accompanying DRA

## Guiding Principles

DRA believes that any form of child abuse and exploitation is unacceptable and will not be tolerated. We believe that all children should be equally protected regardless of their gender, nationality, religious or political beliefs, age, sexual orientation, family and social background and culture, economic status, physical or mental health and criminal background. DRA recognises its duty of care to take all reasonable steps to ensure that children are safe from harm. We take seriously our duty of care and obligations to protect children.

## Definitions

**DRA employees and members** within this policy means employees (Australia and overseas), consultants, contractors, office volunteers, interns, the DRA Board, or anyone engaged to undertake work for this organisation.

**Program beneficiaries** means any person who, either directly or by association, derives a benefit from an DRA or affiliated program. Examples include, but are not limited to; Partner Organisation employees and community members who directly receive a service or engage with a program participant in the course of the participant's work with a Partner Organisation.

**Child Protection** is the term used to describe the responsibilities and activities undertaken to prevent or stop children being abused or maltreated.

**Child Safeguarding** actions, policies and procedures that create and maintain protective environments for children including to protect them from exploitation and abuse of all kinds.

**Child Abuse** happens to male and female children of all ages, ethnicity and social backgrounds, abilities, sexual orientation, religious beliefs and political persuasion. Child abuse includes physical, sexual, emotional, neglect, bullying, child labour and family violence. Abuse can be inflicted on a child by both men and women, as well as by young people themselves. In some cases, professionals and other adults working with children in a position of trust also abuse children.

**Child** any person under the age of 18 years as defined by the Convention on the Rights of the Child, irrespective of local country definitions of when a child reaches adulthood.

**Duty of Care** is a common law concept that refers to the responsibility of the organisation to provide children with an adequate level of protection against harm. It is the duty of the organisation to protect children from all reasonably foreseeable risk of injury.

**Physical abuse** occurs when a person purposefully injures or threatens to injure a child or young person. This may take the form of slapping, punching, shaking, kicking, burning, shoving or grabbing. The injury may take the form of bruises, cuts, burns or fractures.

**Emotional abuse** occurs when a child is repeatedly rejected or frightened by threats. This may involve name calling, being put down or continual coldness from parent or caregiver; to the extent that it affects the child's physical and emotional growth.

**Neglect** is the persistent failure or the deliberate denial to provide the child with clean water, food, shelter, sanitation or supervision or care to the extent that the child's health and development are placed at risk.

**Sexual abuse** occurs when a child or young person is used by an older or bigger child, adolescent or adult for his or her own sexual stimulation or gratification - regardless of the age of majority or age of consent locally. These can be contact or noncontact acts, including sexualised language, voyeurism, fondling genitals or breasts, masturbation, oral sex, vaginal or anal penetration by a penis, finger or any other object and exposing a child to, or involving a child in pornography.

**Exploitation** Commercial or other exploitation of a child refers to the use of the child in work or other activities for the benefit of others that are to the detriment of the child's physical and mental health, education, or moral and social-emotional development. It includes, but is not limited to, child labour, child trafficking and child sexual exploitation.

**Online Child Sexual Exploitation (or child pornography)** in accordance with the Optional Protocol to the Convention on the Rights of the Child, 'child pornography' means 'any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes.

## Code of Conduct

DRA has developed this Child Safeguarding Code of Conduct to protect children, staff and the organisation by providing clear behavioural guidelines and expectations. All DRA employees, volunteers, members, partners/collaborators and project visitors (hereafter referred to collectively as DRA Members) who are likely to come into contact with children are to comply with the following Code of Conduct:

As a DRA Member, I commit that **I will**:

- a. conduct myself in a manner that is consistent with the values of DRA.
- b. provide a welcoming, inclusive and safe environment for all children and young people.
- c. respect all children and treat them equally regardless of gender, race, religious or political beliefs, age, physical or mental health, sexual orientation, family and social background and culture, economic status or criminal background.
- d. encourage open communication between all children, young people, parents, staff and volunteers and have children and young people participate in the decisions that affect them.
- e. immediately report any concerns of child abuse or breach of the Child Safeguarding Policy or this Code of Conduct according to the guidelines outlined in the Child Safeguarding Policy.
- f. immediately disclose all charges, convictions and other outcomes of an offence that relates to child exploitation and abuse, including those under traditional law, which occurred before, or during my association with DRA.
- g. take responsibility for ensuring that I am accountable and do not place myself in positions where there is a risk of allegations being made.
- h. self-assess my behaviours, actions, language and relationships with children.
- i. comply with all relevant Australian and overseas child protection legislation, including labour laws in relation to child labour.
- j. consult with the Child Protection Advisor /Focal Point or other relevant staff if I have any questions regarding child protection and how it relates to my work/relationship with DRA.
- k. comply with the DRA Child Safeguarding Policy and Procedures.
- l. whenever possible, ensure that another adult is present when working near children.
- m. be a positive role model for children.

As a DRA Member, I commit that **I will not**:

- a. engage in behaviour that is intended to shame, humiliate, belittle, degrade or exploit children.
- b. use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, discriminatory, demeaning or culturally inappropriate.

- c. do things of a personal nature that a child can do for him/herself, such as assistance with toileting or changing clothes.
- d. invite unaccompanied children into my home/hotel or other private location, unless they are at immediate risk of injury or in physical danger.
- e. sleep in the same room or bed as a child.
- f. smack, hit or physically assault or physically punish children.
- g. involve children in sexual relationships or any form of sexual activity, including paying for sexual services.
- h. develop relationships with children that may be deemed exploitative or abusive.
- i. not give or provide children with alcohol or illegal drugs.
- j. not show favoritism through the provision of gifts or inappropriate attention.
- k. behave provocatively or inappropriately with a child.
- l. condone or participate in, behaviour of children that is illegal, unsafe or abusive.
- m. act in a way that shows unfair and differential treatment of children.
- n. hold, kiss, cuddle or touch a child in an inappropriate, unnecessary or culturally insensitive way.
- o. seek to make contact and spend time with any child or young person outside the program times.
- p. use any computers, mobile phones, video and digital cameras, or social media inappropriately, nor use them for the purpose of exploiting or harassing children.
- q. hire minors for domestic or other labour.

When photographing or filming a child, or using children's images for work-related purposes, **I will:**

- a. obtain informed and documented consent of the child and his/her parents or guardians before photography/filming .
- b. provide an explanation on how the photograph/film will be used.
- c. ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner.
- d. children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- e. images are honest representations of the context and facts.
- f. ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.
- g. take care to ensure the local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child.

## Policy

### Risk assessment

In order to provide safe activities, programs and environments for children, a child protection risk assessment needs to be undertaken for all activities that involve children, either directly, or indirectly. This includes processes for monitoring and evaluating risk and child safeguarding processes, at all stages of the program/activity/initiative. DRA will conduct a child protection risk assessment on every activity and project involving and affecting children prior to commencement. Mitigation strategies are put in place for any risk identified and these (and any emerging risks) are actively monitored throughout the activity/program/initiative cycle.

The form at Annex A establishes the child protection risk context for both the activity and the organisation and will determine the additional steps required.

### Communication and use of children's images

Whenever DRA decides to use images of children, how the children's images and personal information could be used, adapted and viewed must be a primary consideration. DRA will only use images with the consent of their guardian using the [Homeowner – Right of Entry Form and Liability Waiver](#) form. Specific guidelines are necessary to protect the privacy of children and not to create opportunities where children can be identified and contacted by potentially harmful people. The following principles must be followed at all times:

- DRA will at all times portray children in a respectful, appropriate and consensual way
- a child should always be portrayed 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
- informed consent must always be sought and documented for the use of a child's story or image. When asking for consent, details should be given as to how, where and for how long the story, information and/or image will be used. We will provide examples of how the story, information and/or image will be used. We will explain how we cannot control the use of images once they are loaded onto the internet and that they can be viewed by anyone with internet access at any time
- there should be no identifying information of the child used in the publication of images. This includes the child's family name, community or school name
- children should not be portrayed in isolation; instead, they should be portrayed as part of their community
- local cultural traditions should be assessed regarding restrictions for reproducing personal images
- images should be an honest representation of the context and the facts.

- when sending images electronically, file labels should not reveal identifying information
- all photographers will be screened for their suitability, including police checks where appropriate
- a risk assessment (with the child and their family) will be undertaken prior to the publishing of the story or information about an especially vulnerable child.
- a story about an especially vulnerable child will not show their face or any other identifying factors
- children should not be portrayed as weak, isolated and vulnerable. Images of children should portray them as resilient human beings and as partners in the development and disaster recovery process
- all images and information about children will be stored safely and will only be accessed by authorised personnel

### **Personnel recruitment and selection**

DRA will apply robust recruitment and screening procedures for all DRA members to reduce the risk of engaging a person with a background of unacceptable risks to children. These procedures include:

- verbal referee checks from an applicant's last place of employment/volunteer placement including when working in overseas locations and will include a question regarding any concerns of sexual misconduct.
- Human Resource records to include performance or conduct issues regarding concerns or allegations of actions contrary to this policy.
- all employment/assignment contracts must contain provisions for potential disciplinary action, including termination of employment/assignment following breach of this policy.
- all staff will be required to provide proof of identity including birth certificate, passport, drivers licence and relevant qualifications. Original documents are required.
- where the candidate is working directly with children in Australia, they will require a criminal history or Working with Children Check (depending on the jurisdiction).
- promoting our child safe commitment on our website.

### **Working with partners**

DRA ensures that any implementing partner is a child safe organisation by including partners in the scope of DRA's Child Safeguarding Policy and procedures. DRA's Child Safeguarding Policy and Child Safeguarding Code of Conduct is to be included in partnership agreements, contracts and MOUs. In support of our advancement of the safeguarding of children, we will support our implementing partners through actions such as training, monitoring, capacity building and the provision of advice. We will employ these methods on a case-by-case basis according to the arrangements in place with our partners.

## **Working in emergency contexts**

DRA is committed to ensuring the protection of children when we respond to a disaster or humanitarian emergency. We have specific safeguarding standards in place that are implemented in all our disaster relief responses. All personnel sent to the field to work in emergency contexts with or around children will be pre-screened and given training in child safeguarding. All personnel deployed on an international operation will undergo a criminal history check.

## **Involving children and young people**

DRA recognises the unique insight, experiences and contribution of children and young people and works with them to help identify any potential child protection risks in all programs that include or affect children and young people. These risks are included in the risk management strategy and monitored throughout the program/activity/initiative cycle.

## **Focal person**

DRA National Human Resource Manager is the Child Safeguarding Focal Person for the organisation. They are responsible for raising awareness throughout the organisation and in coordinating, supporting and advising on the development and implementation of policy and practices.

For any international deployment of DRA where there are more than five members deployed, the National Human Resource Manager is to allocate an Operation Child Safeguarding Focal Person. For missions that have five or less deployed members, the National Human Resource Manager is to support and advise remotely.

## **Responding to and reporting child protection concerns**

DRA considers the abuse and exploitation of children to be completely unacceptable. We will take all concerns and reports of child abuse seriously and act on these reports immediately. DRA is committed to a reporting process which is truthful, fair and professional. It is mandatory for all DRA personnel and associates to report any witnessed, suspected or alleged incidents of child exploitation or abuse or any breach of the Child Safeguard Policy and/or the Code of Conduct. These concerns may relate to a child or a DRA member involved in the organisation or a concern about a child or person/s outside of the organisation's program/activity/initiatives. Any concern should be immediately actioned in accordance with DRA's child abuse reporting procedures.

## **Reporting Procedures**

DRA provides a safe, supportive and secure environment to report child protection concerns. DRA will take all concerns seriously and respond immediately. All reports will be recorded, regardless of whether substantiated or whether a full investigation is required. DRA members must immediately report any concerns, suspicions or allegations of abuse or breach of the DRA Child Safeguard Policy.

DRA employees and volunteers may report a concern to any of the following people if the member feels comfortable doing so, and if he/she is not directly or indirectly implicated in the alleged report:

- their Line Manager
- a member of the Human Resources or Wellness team
- Mission Commander (specific to the DRA activity)
- Chief Operating Officer (COO)
- Chief Executive Officer (CEO), or
- by email to [feedback@disasterreliefaus.org](mailto:feedback@disasterreliefaus.org)
- the Police.

A subsequent report should be verbally made to the COO and CEO (if not already notified) as soon as possible.

The COO in consultation with the National Human Resource Manager will investigate the allegations and then decide upon the next step. This may involve one or more of the following:

- interviewing the person/s who made the allegations and/or other witnesses to gather more information with which to make a decision about the allegation
- reporting to local police and or child protection authority when it is suspected or becomes clear that a crime has been committed
- reporting to the Australian Federal Police when it is suspected or becomes clear that a crime has been committed regarding child sex tourism, child sex trafficking and child pornography
- reporting to local child protection services as necessary
- standing down the member during external/internal investigative proceedings
- handling the concern internally if it is not a criminal matter
- providing support to all stakeholders (including reporter) as necessary
- take no further action taken.

## **Investigations**

Internal investigations are only to be conducted where there has been a breach of this policy, but there is no immediate indication that a criminal act has occurred. If during an

investigation it becomes apparent that there has been criminal child abuse then the matter is to be referred to police and the alleged person is to be stood down immediately.

The principles of natural justice will apply to all investigations and are to be conducted using DRA extant quick assessment and investigation procedures. Investigations of abuse or exploitation will be carried out in a manner that is timely, fair, objective and as far as is practicable, confidential.

All information and documented evidence will be held securely and in the strictest confidence as far as is appropriate. The name of the complainant will not be revealed to the person/s potentially implicated in the allegation or to any other person unless the individual personally authorises the disclosure of their identity. This may become a requirement in subsequent investigative processes.

Sensitive information related to reports of child abuse whether involving DRA employees and volunteers or others in the communities in which DRA works shall be shared only with Australian or local law enforcement authorities, when a notification to police or appropriate authorities must be made or on a 'need-to-know' basis. In all cases, consideration should be made to the best interests of the child.

## **Disciplinary action**

Acts of child abuse or exploitation by DRA members constitute acts of gross misconduct. Disciplinary actions or possible outcomes for breach of the DRA Child Safeguarding Policy include:

- referral to local law enforcement authorities (as per national and any mandatory reporting laws), where appropriate
- referral to Australian Federal Police, where appropriate
- DRA internal investigation
- suspension pending investigation
- performance management
- formal warning and monitoring
- termination of employment or volunteer engagement

## **Policy review**

DRA's Child Safeguard Policy and Code of Conduct will be reviewed every two years. The National Human Resources Manager will manage the review of the Child Safeguard Policy and personnel, children and young people as well as other stakeholders will be consulted in this process. Any changes made to the Policy will be signed off by DRA executive management and the Board. DRA undertakes an annual self-audit of Child Safeguard Policy implementation in order to review adherence to our child safeguarding standards.

## Related Policies

- DRA Code of Conduct
- DRA Digital Media
- DRA Prevention of Sexual Exploitation and Abuse Policy
- DRA Whistleblower Protection Policy
- DRA Human Resource Manual
- DRA Diversity and Inclusion Policy
- DRA Quick Assessment and Investigation Procedures

## Relevant Laws, International Conventions and other guiding principles

- International Bill of Human Rights
- The UN Convention on the Elimination of all Forms of Discrimination Against Women
- The UN Convention on the Rights of the Child
- International Labour Organization Convention 182 Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour
- DFAT Child Protection Policy 2017
- ACFID Code of Conduct 2017
- Commonwealth Criminal Code Act 1995 - It is a crime for Australian citizens, permanent residents or bodies corporate to engage in, facilitate or benefit from sexual activity with children (under 16 years of age) while overseas. These offences carry penalties of up to 25 years imprisonment for individuals and up to \$500,000 in fines for companies (extraterritorial legislation)

## References

ACFID Code of Conduct:

<https://acfid.asn.au/content/commitment-14-we-advance-safeguarding-children>

DFAT Child Protection Policy:

<http://dfat.gov.au/aid/topics/safeguards-riskmanagement/child-protection/pages/child-protection.aspx>

United Nations Convention on the Rights of the Child:

<http://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>

Terminology Guidelines for the Protection of Children from Sexual Exploitation and Sexual Abuse – Adopted by the Interagency Working Group in Luxembourg, 28 January 2016



<http://cf.cdn.unwto.org/sites/all/files/docpdf/terminologyguidelines.pdf>

DFAT Code of Conduct for Overseas Service

<http://dfat.gov.au/about-us/publications/Pages/dfat-code-of-conduct-for-overseas-service.aspx>

## Annex A - Establishing the child protection risk context

There are three steps outlined in this guide that are used to establish the **child protection risk context**. Once you have completed the three steps you can establish the overall potential **child protection risk context** and determine whether a full child protection risk assessment is required.

Establishing Child Protection Risk Context	
<b>Step 1</b>	Does the activity involve working with children or contact with children? This step will guide you through identifying the level of involvement with children.  <i>If the activity is determined to be 'working with children' then a full child protection risk assessment is required</i>
<b>Step 2</b>	Is the organisation child-focused and what child protection controls are currently in place?
<b>Step 3</b>	Based on the outcomes of the first two steps, determine the Child Protection Risk Context
<i>Note: All steps <u>must</u> be undertaken. It is not enough to identify an activity as low risk.</i>	

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

There are two parts to this step:

Part A – Determine the activity level of working with or contact with children

Part B – Activity Inherent Risk

Use the definitions at the end of the document to assist with answering Part A and B

#### Step 1: Part A – What is the level of working with or contact with children at the activity level?

Complete the worksheet by adding a **Yes** or **No** response.

<b>1. Contact with Children - Assessment (No = nil contact)</b>		
<b>Inherent risk</b>	Personnel will be deployed internationally (outside their usual country of residence)?	
	Personnel will be working in a remote and/or rural location?	
<b>Degree of Isolation</b>	Involves being alone with children? (not frequently enough to be working with children)	
	Involves activities that are away from organisation location	
	Involves meeting one-on-one with children? (not frequently enough to be working with children)	
	Involves unpredictable or remote settings?	
<b>Online contact or access to personal details</b>	Involves direct one-on-one or group access to children online?	
	Involves supervising child-to-child online contact?	
	Involves online access to a child's or children's personal and/or confidential information?	
	Inadequate/missing safe options for children to report unwanted attention or inappropriate behaviour by others?	
	Involves educating children and supporting adults on cyber safety?	
<b>2. Working with Children - Assessment</b>		
<b>Vulnerability of child/children</b>	Engages with children whose true or cognitive age impacts on their ability to protect themselves?	
	Engages with children who have challenges that contribute to their vulnerability? (e.g. psychological, situational)	
	Engages with children who do not have many support systems?	
<b>Degree of physical contact</b>	Involves demonstrating a skill to children?	
	Position involves need for physical contact/touching children?	



	Involves providing a personal service? (e.g. washing, dressing, toileting)	
<b>Degree of monopoly</b>	<p>Monopoly on provision of goods and/or services</p> <ul style="list-style-type: none"> <li>· Medical?</li> <li>· Food distribution?</li> <li>· Career training (sports/musical)?</li> </ul>	
<b>Degree of supervision</b>	Involves personnel having unsupervised contact with children?	
	Activities/engagement with children is not observed or monitored?	
	Insufficient number of trained staff to supervise activities/engagement with children?	
<b>Degree of trust</b>	Involves developing close, personal, long term relationships with children?	
	Involves transporting youth?	
	Involves one or more of the following: One-on-one supervision, overnight supervision, out of town activities, advising or offering guidance to youth or spending extended periods of time with youth e.g. camps?	
	Contributes to important decisions regarding the future of children?	
<b>Access to Property</b>	Has access to personal/confidential information?	
	Adult has a perceived or actual level of authority? (from child perspective)	
<b>Skills and knowledge required</b>	Requires specific skills, knowledge, qualifications or service eligibility requirements to undertake a child related position?	
<b>Child labour</b>	Possibility that activity will lead to the employment of children?	
	Possibility that activity will lead to the removal of children from school?	
	Possibility that activity will lead to children being employed in hazardous work?	

<b>Vulnerability of parent/carer</b>	Engages with parents whose true or cognitive age impacts on their ability to protect their children?	
	Engages with parents who have challenges that contribute to their ability to provide care? (e.g. psychological, situational)	
	Engages with parents who do not have many support systems?	
<b>Vulnerability can include:</b>	Physical and mental disabilities, homelessness, child sex workers or parents who are sex workers, children and families impacted by disasters, displaced, migrants, refugees and asylum seekers, children in contact with the law, children that have been subject to trafficking, orphans, unaccompanied minors and the very young?	

**Step 1: Part B – Activity Inherent Risk**

Based on responses in Part 1, identify the inherent risk of the activity using the table below. Activity Risk is the level of potential risks to children due to the nature of the activity (working with children) or the design of the activity (design of the activity introduces risks to children).

<b>LOW</b>	<b>No contact</b>		The activity does not involve any individuals working in-country (Nil Contact) (you answered No to all questions in Step 1 Part A)
<b>MODERATE</b>	<b>Contact with Children</b>		The activity involves or may involve contact with children (working in-country, remote or rural area) (you answered Yes to <u>any</u> questions in 'Contact with Children - Assessment' but 'No' for all questions in 'Working with Children - Assessment')
<b>HIGH</b>	<b>Working with Children</b>		The activity involves working with children (you answered YES to <u>any</u> questions under 'Working with Children - Assessment')

**Note:** If an activity is determined to be 'working with children' then a full child protection risk assessment is required regardless of the organisational context outcome.

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

There are two parts to this step:

Part A – Assessment of Organisation’s Focus on Children and strength of child protection systems in place

Part B – Organisation Inherent Risk

**Step 2: Part A – Assessment of Organisation’s Focus on Children and Strength of Systems**

Complete the worksheets below and add a Yes/No response against each question under ‘Systems and Controls’ and ‘Focus’.

**Systems and Controls** - Strength of systems and controls scaled by number of ‘yes’ responses.  
Use the scale 0 Yes answers = poor systems, 9 Yes answers = strong systems

<b>Child protection policy and procedures [2]</b>	Child Protection Policy in place?	
	Risk management practices in place and include risks to children	
	Recruitment practices, screening completed for all staff, before commencing work?	
	Notifications/Incident reporting procedures in place?	
	Staff receive child protection training?	
	Boundaries for appropriate behaviour/code of conduct are implemented?	
	Feedback on staff performance recorded?	
	Record keeping procedures are in place (meetings, activities, incidents, reports, logs, record of complaints)?	
	Organisation checks if third party service providers are child safe?	

**Focus** - A child-focused organisation is an organisation that answers 'yes' to any of the questions below.

<b>Types of activities</b>	Does the organisation across all of its operations provide any direct activities/services for children?	
	Does the organisation provide any humanitarian relief?	
<b>Business model/services provided by organisation [3]</b>	Organisation provides Residential/Orphanage/Shelter services?	
	Organisation uses a child sponsorship model?	
	Organisation allows sponsors to visit with children?	
	Organisation is part of a 'voluntourism'[4] program?	
	Organisation requires technical experience/expertise to implement child related services?	
	Organisation uses children and/or images of children as a 'product' for fundraising activities?	

**Step 2: Part B – Organisation Inherent Risk**

Organisational risk is the level of potential risk posed by the organisation due to their ability to address child protection risks through their policies, procedures and systems and the type of work the organisation engages in (e.g. if they are a child focussed organisation, their risks will be higher).

<b>LOW</b>	<b>NO FOCUS</b>		Organisation is not a child-focused organisation ( you answered No to all questions in Step 2 – Focus)
<b>MODERATE</b>	<b>FOCUS &amp; STRONG SYSTEMS</b>		Organisation is a child-focused organisation and has good child protection systems in place (You answered Yes to any question in Step 2 Focus and had a majority of Yes answers to the questions under systems and controls)
<b>HIGH</b>	<b>FOCUS &amp; POOR SYSTEMS</b>		Organisation is a child-focused organisation and has poor or nil child protection systems in place (You answered Yes to any question in Step 2 Focus and had a majority of No answers to the questions under systems and controls)

**Step 3: Establish the overall potential child protection risk context and whether a full child protection risk assessment is required**

Once you have completed steps 1 and 2 you can establish the overall risk context by placing the results of each activity in the appropriate field below:

Organisation level of contact with children and systems in place (organisation inherent risk from Step 2)	Activity Level of Contact with Children (activity inherent risk from Step 1)		
	NIL (LOW)	CONTACT (MODERATE)	WORKING (HIGH/VERY HIGH)
<b>NO FOCUS (LOW)</b>	“ No further assessment required	“ Include risks in relevant Investment risk register, monitor for changes	“ Full child protection risk assessment required
<b>FOCUS &amp; STRONG SYSTEMS (MODERATE)</b>	“ Include risks in relevant Investment risk register, monitor for changes	“ Include risks in relevant Investment risk register, monitor for changes	“ Full child protection risk assessment required
<b>FOCUS &amp; POOR SYSTEMS (HIGH/VERY HIGH)</b>	“ Full child protection risk assessment required	“ Full child protection risk assessment required	“ Full child protection risk assessment required

Low Risk	Moderate Risk	High Risk	Very High Risk
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**If the matrix indicates a full child protection risk assessment is required**

Conduct a full assessment of the child protection risks within the organisation and activity using the organisation’s own risk management processes and documentation. A full child protection risk assessment requires the partner to assess all possible child protection risks within the activity.



**If the matrix indicates a requirement for monitoring of child protection risks**, it is recommended that the risk be included in the relevant Investment risk register and monitored accordingly.

Identify and record who completed the steps above and when full child protection risk assessment (if required) will be completed.