



CHILD PROTECTION POLICY

1. PURPOSE

- 1.1. This policy articulates the framework for managing and reducing the risk of child abuse by persons engaged in delivering WWF-Australia's activities or persons or organisations funded by, or through, WWF-Australia.

2. OBJECTIVE

- 2.1. To create and maintain protective environments for children in the delivery of WWF-Australia's projects and programs.

3. BACKGROUND

- 3.1. Child exploitation and abuse is not tolerated by WWF-Australia. WWF-Australia is committed to the protection of children and the rights guaranteed to them under The United Nations *Convention on the Rights of the Child* (1989).
- 3.2. WWF-Australia recognises that it is the shared responsibility of all adults to prevent child exploitation and abuse. Especially where its work involves, interacts with or otherwise affects children, WWF-Australia has additional responsibilities to ensure that risks to children are identified, mitigated and managed.
- 3.3. All children have equal rights to protection, regardless of their race, gender, religion or abilities; whatever they think or say, whatever type of family they come from, where they live, what language they speak, what their parents do, whether they have a disability or whether they are rich or poor. No child should be treated unfairly on any basis and all children are entitled to protection from all forms of physical and mental violence, injury, abuse, neglect, maltreatment and exploitation, including sexual abuse.
- 3.4. WWF-Australia is signatory to the Australian Council for International Development's (ACFID) Code of Conduct which requires members to have:
 - 3.4.1. A demonstrated commitment to respect and protect human rights.
 - 3.4.2. A demonstrated commitment to the safeguarding of children.
 - 3.4.3. A code of conduct that advances child safeguarding behaviours and applies to all personnel, partners and project visitors.
 - 3.4.4. A documented child safeguarding incident reporting procedure and complaints handling procedure that aligns with principles of privacy and promotes safety and dignity.
- 3.5. This Policy should be read in conjunction with WWF-Australia's *Policy on Human Rights and Working with Marginalised Groups & Vulnerable People*.

4. POLICY

- 4.1. WWF-Australia will not permit any personnel to work with children if they pose an unacceptable risk to children's safety or well-being.
- 4.2. Managers and supervisors will assess and eliminate or mitigate the risk of child abuse associated with the delivery of all programs, projects and activities. WWF-Australia requires its Partner Organisations, including WWF offices internationally, subsequent sub-contractors, grantees or representatives of WWF-Australia, to similarly assess and manage these risks.
- 4.3. In the event that a project or activity is determined as directly "working with children" (i.e. an activity



where contact with children would reasonably be expected as a normal part of the activity, as opposed to incidental contact), a full child protection risk assessment, consistent with DFAT *Child Protection Policy* (2017) must be conducted.

- 4.4. WWF-Australia personnel, partners and contractors taking photographs or capturing video footage will obtain the informed consent of any children and/or their guardians. All images should present 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 reasonably seen as sexually suggestive.
- 4.5. WWF-Australia will not fund, or provide other forms of support, to any individual or organisation that plans to work with children, unless they meet WWF-Australia's child protection compliance standards in their operations and activities.
- 4.6. Managers and supervisors will not knowingly engage, directly or indirectly, anyone who poses an unacceptable risk to children, nor will WWF fund any individual or organisation that does not meet WWF's child protection compliance standards in their operations and activities.
- 4.7. WWF requires the active support and cooperation of contractors and other NGOs implementing WWF-funded activities. Contractors and NGOs must meet the terms of the Child Protection Policy and are held accountable, through contracts and audits, for complying with it.
- 4.8. WWF-Australia endorses the Department of Foreign Affairs and Trade's (DFAT) approach to child protection, which aims to reduce the risks of child abuse or exploitation associated with its functions and programs, including by partners delivering Australian aid program activities; and requires all - accredited NGOs to develop their own child protection code of conduct and ensure that all personnel implementing Australian Government-funded Aid and Development Activities agree to and abide by it.
- 4.9. The People & Culture Director is WWF-Australia's appointed Child Protection Officer.

5. SOURCES OF AUTHORITY

5.1. International

- *The United Nations Convention on the Rights of the Child*
- *Optional Protocol to the United Nations Convention on the Rights of the Child on the sale of children, child prostitution and child pornography*
- *Geneva Declaration of the Rights of the Child*
- *ILO Convention 182 Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour*

5.2. Federal Legislation

- *Criminal Code Act 1995*
- *Crimes Act 1958*

5.3. State Legislation

Australian Capital Territory

- *Children and Young Persons Act 2008*
- *Working with Vulnerable People (Background Checking) Act 2011)*

New South Wales

- *Child Protection (Working with Children) Act 2012*

Northern Territory



- *Care and Protection of Children Act 2007*

Queensland

- *Commission for Children and Young People and Child Guardian Act 2000*

South Australia

- *Children's Protection Act 1993*

Tasmania

- *Children, Young Persons and Their Families Act 1997*

Victoria

- *Children, Youth and Families Act 2005*
- *The Child Wellbeing and Safety Act 2005*
- *Working with Children Act 2005*

WA

- *Children and Community Services Act 2004*
- *Working with Children (Criminal Record Checking) Act 2004*

5.4. WWF-Australia

- *Policy on Human Rights and Working with Marginalised Groups & Vulnerable People*
- *Recruitment and Selection Policy*

5.5. WWF Network

- WWF International [Child Safeguarding and Protection of Rights](#).

5.6. Department of Foreign Affairs and Trade (DFAT)

- *DFAT Child Protection Policy (January 2017)*¹
- *Guidance Note – Establishing Child Protection Risk Context (September 2016)*²
- *Australian NGO Accreditation Guidance Manual (October 2016)*³

5.7. Australian Council for International Development

- *ACFID Code of Conduct*
 - *Quality Principle 1 – Commitment 4 (Advance the safeguarding of children)*

6. SCOPE

6.1. This policy applies to all WWF-Australia board members, staff, volunteers and contractors, including sub-contractors and grantees.

6.2. This policy applies to all Partner Organisations and their board members, staff, volunteers and contractors implementing Aid and Development Activities outside Australia that are funded by, or

¹ <http://dfat.gov.au/international-relations/themes/child-protection/Documents/child-protection-policy-2017.pdf>

² <http://dfat.gov.au/about-us/publications/Pages/child-protection-policy.aspx>

³ <http://dfat.gov.au/about-us/publications/Documents/ngo-accreditation-manual.pdf>



through, WWF-Australia.

7. DEFINITIONS

Aid and Development Activities	Activities explicitly designed to reduce poverty and address issues of global justice through projects, advocacy and other approaches which improve the conditions of communities in sustainable ways.
Child (plural 'children')	In accordance with the United Nations Convention on the Rights of the Child, 'child' means every human being below the age of 18 years unless under the law applicable to the child, majority is attained earlier. For the purposes of this policy, WWF-Australia considers a child to be a person under the age of 18 years.
Child abuse	All forms of physical, mental, emotional or sexual abuse, maltreatment or exploitation directed towards children. Physical abuse includes violence, injury and physical neglect. Mental and emotional abuse includes verbal assaults and bullying. Exploitation includes child labour, child pornography and commercial sexual exploitation. Both boys and girls can be the victims of child abuse. Child abuse can be inflicted on a child by men or women, or by young people themselves. In some cases, professionals and other adults working with children in positions of trust abuse children.
Child abuse material/ Child exploitation material	Material that explicitly or implicitly depicts a child (a person under 18 years of age) as a victim of torture, cruelty or physical abuse, including but not limited to child pornography.
Child exploitation	One or more of the following: <ul style="list-style-type: none"> • Committing or coercing another person to commit an act or acts of abuse against a child • Possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material • Committing or coercing another person to commit an act or acts of grooming or online grooming • Using a minor for profit, labour, sexual gratification, or some other personal or financial advantage.
Child pornography	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.' For further information regarding child pornography offences, refer to the Criminal Code Act 1995 (Australia).
Child Safeguarding / Child Protection	"Actions, policies and procedures that create and maintain protective environments for children to protect them from exploitation and abuse of all kinds" (<i>ACFID Code of Conduct Quality Assurance Framework, 2017</i>).
Criminal record check	In Australia, national criminal record checks are available through state and territory police departments. They take around 20 working days to perform. Overseas, different procedures apply in each country and may take six weeks or longer. Individuals need to give their consent to a criminal record check and should be informed of the purpose for which the resulting police clearance certificate will be used.
Harm	Harm in the child protection context is defined as the detrimental impact on the physical, psychological, emotional or social safety, well-being and



	development of a child as a result of the actions or inactions of another person.
Informed Consent	Ensures the child and/or guardian understand the implications, purpose and possible uses of photographs or videos in which the child may appear.
Partner Organisations	Organisations implementing Aid and Development Activities funded by, or through, WWF-Australia.
Personnel	Personnel either employed by an organisation, or engaged by an organisation on a sub-contract basis, or engaged by an organisation on a voluntary or unpaid basis.
Police clearance certificate	The certificate showing the results of a criminal record check, issued by the police or other authority responsible for conducting such checks.
Risk	Anything that can cause harm or loss to a child
Risk of harm	<p>The likelihood of inflicting harm to children (either directly or as a consequence of other actions) and the severity of that risk. In the child protection context, a child would be considered to be at risk if they are in a situation where there is a high likelihood that the child's safety and/or well-being will be severely compromised.</p> <p>Some areas of risk of harm may include:</p> <ul style="list-style-type: none"> • Personnel (employees and volunteers): management, training, recruitment and supervision • Place/physical environment: any areas children may access or use • Activities, projects and programs: programs, outreach, activities • Information: dissemination of relevant information, recording information, storage of information.
Risk management	Identifying and assessing all potential sources of harm and taking steps to decrease the likelihood that harm will occur.
Screening	This term includes criminal record checks (often called 'police checks') which are conducted to determine if a person has any known criminal history. Additional screening measures may include: 'working with children' checks, identity checks, verbal referee checks and targeted, behavioural-based interview questions.
Working with children	Working in a position that involves regular contact with children, either under the position description or due to the nature of the work environment.

8. RESPONSIBILITIES

7.1. Executive Management are responsible for:

- Ensuring that WWF-Australia and all staff members, volunteers and contractors comply with all relevant legislation and WWF-Australia policies (including this one).
- Ensuring that all Partner Organisations and their board members, staff members, volunteers and contractors implementing Aid and Development Activities funded by, or through, WWF-Australia, comply with all relevant legislation and WWF-Australia policies (including this one).
- Ensuring the proper use of the Child Protection Risk Assessment at the design, implementation and monitoring and evaluation phase of WWF-Australia Aid and Development



Activities, including documented risk treatments.

7.2. People & Culture are responsible for:

- Assisting managers with the construction of appropriate training and development programs, designed to aid compliance with this policy.
- Providing managers and other staff members with support and assistance during any complaint or dismissal process.
- Managing the recruitment and selection process for all employees, interns and volunteers in accordance with the Recruitment and Selection Policy and this policy.
- Ensuring selection processes include relevant screening processes, including behavioural-based interview questions to provide additional information about the applicant's suitability to work with children.
- Arranging and maintaining records of criminal record checks.
- Ensuring the Child Protection Risk Assessment is used in accordance with this policy.
- As Child Protection Officer, the People & Culture Director will ensure all reports of child abuse or exploitation are; acted on immediately, are treated as strictly confidential, are managed according to procedural fairness principles in accordance with this policy, and immediately report to the DFAT Child Protection Compliance Section and Conduct and Ethics Section in any cases where suspicions or allegations of child abuse or exploitation may involve DFAT funding.

7.3. Managers are responsible for:

- Ensuring that they comply with all relevant legislation and WWF-Australia policies.
- Ensuring all WWF activities that involve children are safe and without unacceptable risks for children.
- Recognising and taking appropriate action to either report on or eliminate activities that pose an unacceptable risk to children.
- Communicating this Policy to all Partner Organisations, and ensuring that Partner Organisations communicate this Policy to their board members, staff, volunteers and contractors implementing Aid and Development Activities funded by, or through, WWF-Australia.
- Approving activities and/or funding only when the requirements of this Policy have been met.
- Providing the CEO and People & Culture Director with all information that relates to breaches or potential breaches of this policy.
- Seeking support and assistance from People & Culture as required.

7.4. All staff and volunteers are responsible for:

- Acting in the best interests of the health, safety and welfare of any child encountered during the delivery of WWF's projects or programs.
- Immediately reporting any concerns relating to child abuse by anyone covered by this policy.
- Completing criminal record check forms, as required.
- Complying with the Child Protection Code of Conduct, as required.



9. PROCEDURES

PART A

- 9.1. Child-safe recruitment and screening processes, including criminal record checks prior to engagement, targeted interview questions and verbal referee checks are used for all personnel (including volunteers and independent contractors) who are deemed likely to work with children on the findings of the Child Protection Risk Assessment (Annex 2).
- 9.2. Where criminal record checks are required, they are conducted for each country in which the individual has lived for 12 months or longer over the last five years and for the individual's country of citizenship. Individuals need to give their consent to a criminal record check and are informed of the purpose for which the resulting police clearance certificate will be used, including being sighted by WWF-Australia (and DFAT where an Australian Government-funded activity is involved and when requested). WWF-Australia recognises that, in limited instances, it may prove impossible to obtain a reliable criminal record check and will take this into account during selection processes.
- 9.3. Child protection training is provided and arranged as part of staff induction and whenever otherwise deemed necessary, by:
 - People & Culture for relevant WWF-Australia staff.
 - Trained WWF-Australia staff for relevant WWF-Australia implementing Partner Organisation staff.
- 9.4. A Child Protection Code of Conduct (see Annex 1), is signed by all staff who may be working with children. All signed Codes of Conduct are retained by People & Culture.
- 9.5. WWF-Australia requires its Partner Organisations to similarly provide this commitment to WWF-Australia in writing.
- 9.6. WWF-Australia undertakes to include a provision in all employment contracts that it has the right to dismiss the staff member or transfer the staff member to other duties if he/she breaches the Child Protection Code of Conduct.
- 9.7. WWF-Australia requires its implementing Partner Organisations to include a similar provision in all their employment contracts.
- 9.8. WWF-Australia has a Child Protection Policy Compliance Regime which includes:
 - Ensuring that all relevant WWF-Australia staff comply with the Policy, including signing the Code of Conduct.
 - Ensuring that employment contracts for all WWF-Australia staff refer to the Policy.
 - Communicating the Policy to WWF-Australia's Partner Organisations in writing and requiring their compliance.
 - Including reference to the Policy in annual contractual agreements with the implementing Partner Organisations.
 - Monitoring implementing Partner Organisations' compliance with the Policy during annual project and program monitoring missions.
- 9.9. Child protection risks are assessed as part of standard WWF-Australia risk management processes throughout the lifecycle of the activity (design, implementation, monitoring and evaluation). WWF-Australia has a risk assessment tool (see Annex 2) which is to be used to assess staff, volunteers and contractors in relation to their contact with children, as well as to assess Aid and Development Activities for any potential of risks to children.



- 9.10. In addition to this, where WWF-Australia is responsible for risk assessment for any activity, including any Australian Government-funded activity, that involves working with children (including volunteer sending assignments), the overall risk assessment process will include risks to children.
- 9.11. WWF-Australia complies with all legislative and contractual requirements relating to Child Protection, including the DFAT Child Protection Policy.

PART B

- 9.12. This Policy will be included in all contracts and memoranda of understanding with Partner Organisations.
- 9.13. No later than November of each financial year, WWF-Australia will organise an induction/workshop – which may be held either face-to-face or by Skype or phone conference – at which this Policy, its importance and consequences of non-compliance, will be presented to the Partner Organisation’s executive and relevant staff, volunteers and contractors.
- 9.14. All Aid and Development Activities funded by or through WWF-Australia and Partner Organisations and relevant staff, volunteers and contractors will be monitored to ensure they are not in breach of this Policy. Monitoring will be proportionate to the amount of funding and the risk of breach (as a result of the funded activities, organisation or skills and experience of board and staff) and will be recorded in the program/project file and signed by the relevant program/project manager. Monitoring will include at least one country visit annually at which this Policy will be made the subject of special presentation.
- 9.15. Applying this Policy may be difficult in some situations and sound judgement will be necessary. The Policy cannot provide a specific response for every circumstance. WWF will apply the spirit and intent of this policy in the conduct of Aid and Development Activities.
- 9.16. If this Policy does not provide a clear answer on how to comply in a particular circumstance, WWF will document clearly the decisions made and the reasons behind them and make them available to both recipients and donors.
- 9.17. Feedback is important to WWF and its Partner Organisations as it encourages improvement. Therefore, all feedback is welcome. Feedback will be directed to the relevant department of WWF-Australia for action. A complaint regarding an alleged breach of the ACFID Code of Conduct can be made directly to ACFID.

10. REPORT HANDLING PROCEDURE

- 10.1. Anyone from WWF-Australia, an implementing Partner Organisation, external Organisation or civil society who suspects that a child or young person is at risk of harm, child exploitation and/or abuse should immediately report it to the WWF-Australia Chief Executive Officer (dogorman@wwf.org.au) or People & Culture Director/Child Protection Officer (kdixon@wwf.org.au).
- 10.2. Reporters are not required to confirm their suspicions or provide solid proof before making a report.
- 10.3. The Chief Executive Officer immediately refers such reports to an internal committee comprising the People & Culture Director, Conservation Director or any other member of the Executive Team deemed appropriate to the matter for advice.
- 10.4. The Chief Executive Officer, on advice, will determine appropriate action which may include; referral of the matter to civil authorities such as police; convening the Internal Investigations and Disciplinary Panels Procedure; invoking internal disciplinary action up to and including dismissal in accordance with the Disciplinary Policy.
- 10.5. All documents relating to reports of child exploitation, abuse and risk of harm will be retained by WWF-Australia for a period of seven years.



- 10.6. In cases where DFAT funding may be involved, the Child Protection Officer will immediately report to DFAT and liaise directly with the DFAT Child Protection Compliance Section and Conduct and Ethics Section for advice and reporting.

11. CONFIDENTIALITY AND DOCUMENT CONTROL

- 11.1. All policies are published on the wiki Habitat intranet which is accessible to all staff and volunteers.
- 11.2. A copy of the Policy will be provided to any person or organisation on request.
- 11.3. This policy will be reviewed at least every five years or earlier if warranted.

12. APPROVAL

Name:	Greg Bourne
Title:	CEO
First Issued	28 August 2008

REVISIONS

Name:	Greg Bourne
Title:	CEO
Date of Revision:	2 August 2010

Name:	Dermot O’Gorman
Title:	CEO
Date of Revision:	3 February 2012

Name:	Dermot O’Gorman
Title:	CEO
Date of Revision:	24 October 2012

Name:	Dermot O’Gorman
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Title: CEO

Date of Revision: 23 April 2013

Signed:

Name: Dermot O'Gorman

Title: CEO

Date of Revision: 10 July 2018



ANNEX 1: Child Protection Code of Conduct

Child Protection Code of Conduct

I, (name)

engaged by (organisation)

agree that while implementing WWF-Australia activities, including Australian Government-funded Aid and Development Activities, I will:

- Treat all children with respect
- Not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate
- Not provide alcohol or drugs to children
- Not engage children in any form of sexual intercourse or sexual activity, including paying for sexual services
- Wherever possible, ensure that another adult is present when working in the proximity of children
- Not invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger
- Refrain from giving gifts to children
- Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible
- Not use any computers, mobile phones, or video and digital cameras inappropriately, and never to exploit or harass children or to access child pornography or other child abuse/child exploitation material through any medium (see also 'Use of children's images for work-related purposes' below)
- Not physically punish or discipline children (excluding my own children)
- Not hire children 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, including labour laws in relation to child labour
- Immediately report concerns or allegations of child abuse in accordance with appropriate procedures.
- Immediately disclose all charges, convictions and other outcomes of an offence, which occurred before or occurs during my association with WWF-Australia and/or implementing Partner Organisations that relate to child exploitation and abuse.
- Be aware of behaviour and avoid actions or behaviours that could be perceived by others as child exploitation or abuse.



Use of children’s images for work-related purposes

When photographing or filming a child for work-related purposes, I 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 informed consent from the child and/or a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
- Ensure photographs, films, videos and DVDs present 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 honest representations of the context and the facts.
- 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.

I understand that the onus is on me, as a person engaged by, to use common sense and avoid actions or behaviours that could be construed as child abuse.

Signed:

Date:



Annex 2: CHILD PROTECTION RISK ASSESSMENT TOOLS

Name: Click or tap here to enter text. Date: Click or tap here to enter text.

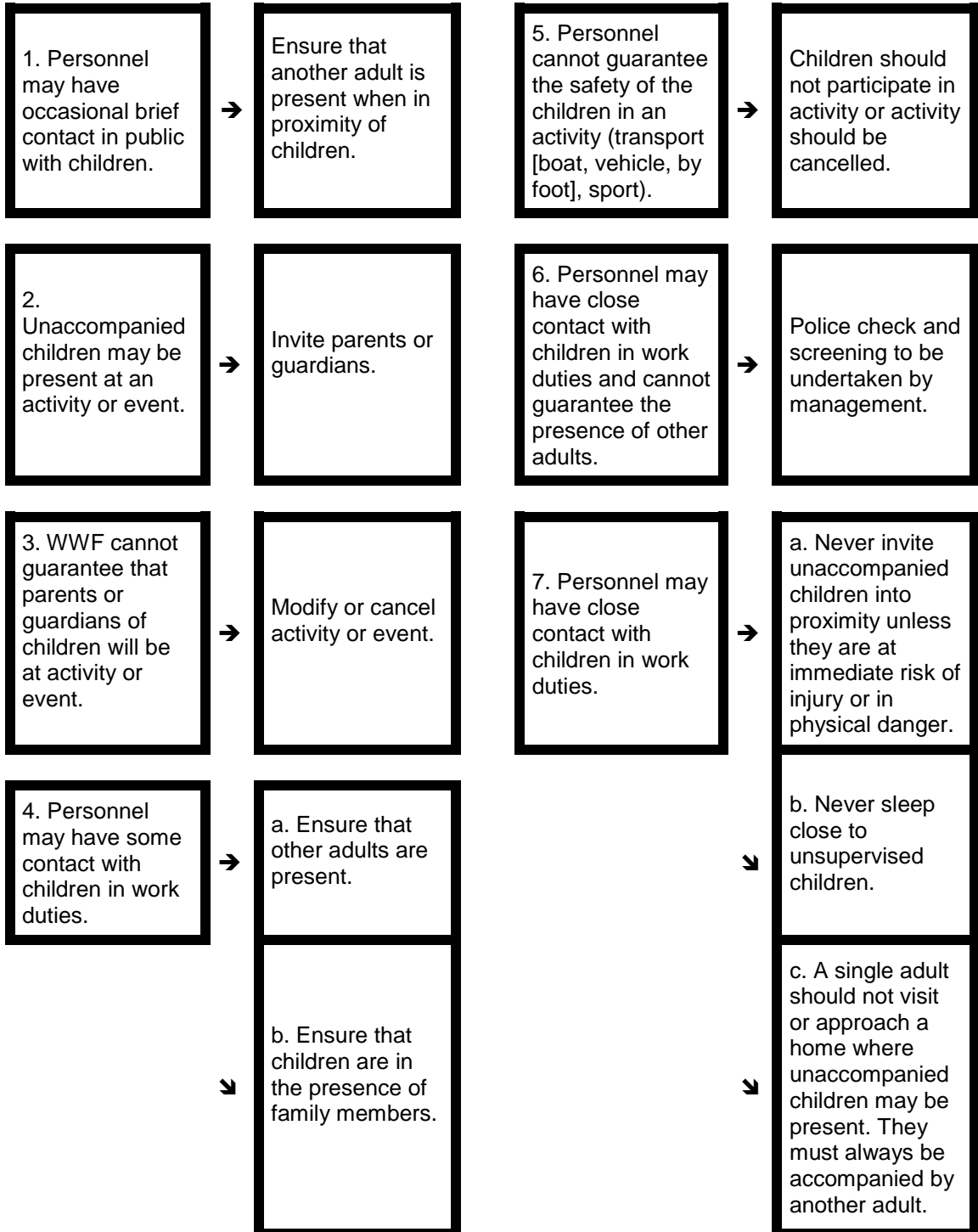
A. CHILD PROTECTION RISK ASSESSMENT CHECKLIST

Please complete the following checklist in response to questions 1 to 6. If, at the end of the checklist, the answer to question #6 is 'No', then proceed to *Section B. Child Protection Scenarios and Guidance* and *Section C. Actions Taken to Eliminate or Mitigate Risks*.

1.	Are personnel involved in the activity aware of and understand the Policy on Child Protection?	<input type="checkbox"/> Yes Go to #2 <input type="checkbox"/> No Ensure they have & read a copy of policy then go to #2
2.	Will personnel come into contact with children in the course of their work?	<input type="checkbox"/> Yes Go to #3 <input type="checkbox"/> No No further action required
3.	Have personnel signed the Child Protection Code of Conduct?	<input type="checkbox"/> Yes Keep on file, Go to #4 <input type="checkbox"/> No Print, sign, witness, file. Go to #4
4.	Is it necessary for them to come into contact with children?	<input type="checkbox"/> Yes Go to #5 <input type="checkbox"/> No Remove potential for contact
5.	Is there a risk of harm?	<input type="checkbox"/> Yes Go to #6 <input type="checkbox"/> No Monitor if the situation changes to 'Yes'
6.	Can the risk of harm be eliminated?	<input type="checkbox"/> Yes Eliminate harm <input type="checkbox"/> No Go to Section B

B. CHILD PROTECTION SCENARIOS AND GUIDANCE

If personnel (staff, volunteers, contractors) will have contact with children during WWF work activities (events, activities, speaking events, donation collecting, fundraising, site visits, community programs etc.), use the following guidance:



Please send the completed checklist, indicate the relevant scenarios and guidance, document actions taken on the following page and forward all the completed paper work to People & Culture, WWF-Australia.

C. ACTIONS TAKEN TO ELIMINATE OR MITIGATE RISKS



The actions I have taken to eliminate or significantly mitigate the risk of harm to children in accordance with the above guidelines are:

[Click or tap here to enter text.](#)