



VACD Ltd. - CHILD PROTECTION POLICY

INTRODUCTION AND CONTEXT:

VACD Ltd. values the safety and protection of children in communities in which we operate, in particular when they live in difficult circumstances, with inadequate or basic shelter and security and in low socio-economic circumstances. These children are particularly vulnerable because of these circumstances and may therefore be more susceptible to abuse and exploitation. In this context, VACD Ltd acknowledges its responsibility to ensure the safety of children is paramount.

OUR COMMITMENT TO CHILD PROTECTION:

VACD Ltd. is committed to ensure the safety and wellbeing of children and to protecting them from abuse and exploitation. We believe child protection is best safeguarded by embedding child protection values in our organisational culture and by ensuring those values permeate into individual conduct and behaviour.

VACD Ltd. does this by:

1. ensuring child safety risks are taken into consideration when implementing projects and programs;
2. providing guidelines for appropriate behaviour by the children, their carers and parents when visiting VACD Ltd. Clinics or the Centre;
3. requiring each individual who works for, or represents VACD Ltd., to commit and adhere to the Child Protection Code of Conduct as detailed in the code of conduct for VACD Ltd. Members and Volunteers;
4. providing a clear mechanism for reporting suspected abuses, and
5. ensuring the message is clear throughout VACD Ltd. that we do not tolerate and/or condone child exploitation and/or abuse and will use the full force of existing laws to identify, eliminate and punish those who violate or have disregard to these principles, precepts and values.

GUIDING PRINCIPLES:

VACD Ltd. does not tolerate child abuse or exploitation in any form. Our Child Protection Policy is guided by the principles enunciated in the UN Convention on the Rights of the Child (1989), ratified by Australia in 1990, domestic legislation including the *Criminal Code Act 1995* and *Children and Young Persons (Care and Protection) Act 1998* (NSW).

The starting point of the Child Protection Policy is article 19 of the Convention on the Rights of the Child, which states:

“State Parties shall... protect the child from all forms of physical and mental violence, injury and abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse...”

SCOPE:

For the purposes of this policy, a child is a person is under 18 years of age.

This policy applies to all projects and programs conducted and implemented by VACD Ltd. The policy governs the conduct of:

- All VACD Ltd. members and Staff;
- All VACD Ltd. Volunteers;
- Any other representatives of VACD Ltd., such as consultants, photographers, and persons attending project sites on behalf of VACD Ltd. and/or its partners;
- Staff of partners involved in VACD Ltd. projects and programs.

DEFINITIONS AND TERMS:

Physical abuse:

Physical abuse occurs when a person uses or threatens to use physical force against a child that results in harm to the child. Physical abuse includes shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning and any other form of abuse that would fall under this category.

Emotional abuse:

Emotional abuse occurs when inappropriate verbal or symbolic acts are carried out towards a child, or where there is a pattern of failure over time to provide a child with adequate non-physical nurture and emotional support. Such acts are likely to damage a child’s self-esteem or social competence and include ridiculing, intimidating, threatening or isolating the child.

Sexual abuse:

Sexual abuse is the use of a child for sexual stimulation or gratification by an adult or significantly older child or adolescent.

Neglect:

Neglect is the intentional withholding from a child the basic necessities of life, such as clothing, shelter and supervision to the extent that the child’s health and development are at risk.

A. CHILD SAFETY RISK MANAGEMENT:

All VACD Ltd. members and volunteers are bound by the “VACD Ltd. Code of Conduct” and “VACD Child Protection Policies” and are expected to identify any risks to child safety arising out of any or all project and program activities that are ongoing, planned and/or implemented by the VACD Ltd. and to eliminate and/or mitigate such risks that could harm a child under their care or protection either outside or within a building designated to be VACD Ltd. property or where VACD Ltd. activities are conducted.

The source of the risk is to be described as 'Child Safety'. Examples of specific risks that might be relevant to a VACD Ltd. project/program include:

- Unaccompanied children attending VACD Ltd. clinics, the centre, social or other activities, excursions or tours;
- Siblings of children registered with VACD Ltd. who are left unsupervised at VACD Ltd. premises due to parents/guardians' involvement in VACD Ltd. projects or programs;
- Visitors to VACD Ltd. project/program sites acting on behalf of VACD Ltd. taking photographs of children without their parents/guardian's knowledge, consent and/or permission and/or the approval of VACD Ltd. authorities;

Risk mitigation strategies should be identified, adopted and responded to while as a minimum, the strategies should include requirements that:

1. All VACD Ltd. members, staff, committee, volunteers and representatives attending VACD Ltd. activities, the clinic or the centre have understood and are committed to VACD Ltd. Child Protection Policies and VACD Ltd. Code of Conduct;
2. Any VACD Ltd. partner staff who will be working on VACD Ltd. projects and programs must provide confirmation that they will adhere to their own Child Protection Code of Conduct, which must align with VACD Ltd. policies, or if the partner does not have any such code, its relevant staff should adhere to VACD Ltd. Child Protection Policies and Code of Conduct.

B. VISITING VACD Clinics and Centre:

VACD Ltd. members, volunteers and guests visiting VACD Ltd. clinics or the VACD centre must ensure reasonable precautions are taken to protect children during such visits by adhering to the following guidelines:

1. VACD Ltd. members must conduct themselves with the utmost professionalism and integrity at all times. Visitors must not physically injure or threaten to injure a child, emotionally abuse or sexually abuse a child;
2. Visits to VACD Ltd. clinics or the centre must be arranged through authorized VACD Ltd. individuals and no person should bypass or contravene these guidelines;
3. In preparation for the visit to a VACD Ltd. Clinic or the Centre all visitors will be provided with a copy of VACD Ltd. Child Protection Policy and Code of Conduct and will be given information regarding appropriate behaviour during the visits;
4. VACD Ltd. staff and/or partner staff must accompany other visitors to VACD Ltd. clinics or the Centre and must not spend time with a child of a beneficiary, unsupervised;
5. Any gifts, contributions or correspondence to or with beneficiaries or their children must be first facilitated through and screened by the VACD partner and then routed through VACD Ltd.;
6. Inappropriate or suspicious behaviour of visitors towards any child must be addressed immediately by the VACD Ltd. member present and reported immediately to the VACD Ltd. leadership.

C. CHILD PROTECTION POLICY & CODE OF CONDUCT:

VACD Ltd. has a Child Protection Policy and Code of Conduct. All VACD Ltd. members and volunteers and all others representing VACD Ltd. and/or VACD Ltd. partners must adhere to the Child Protection Policy and Code of Conduct at the commencement of their engagement with VACD Ltd.

D. CONDUCT OF IMPLEMENTING PARTNERS OF VACD Ltd.

Implementing partners are also required to adhere to the child protection values outlined in this policy. This is to be monitored by VACD Ltd. leadership in accordance with the guidelines and due diligence process outlined.

VACD Ltd. Chairman and Board:

1. VACD Ltd. Chairman and Board must regularly review VACD Ltd. partner's Child Protection Policy (or equivalent) and Code of Conduct to ensure it aligns with VACD Ltd. child protection guidelines outlined in this policy;
2. If no such policy or code is in place, the VACD Ltd. must provide a copy of VACD Ltd. Child Protection Policy and Code of Conduct to the partner and obtain their agreement to abide by the policy and code;
3. As a minimum, the partner staff who will be present at the Clinic or the Centre must agree and abide by the VACD Ltd. Child Protection Policy and Code of Conduct if they have not already agreed to their own organisation's Code of Conduct.

E. RECRUITMENT:

VACD Ltd. follows strict guidelines in the recruitment of staff and volunteers and other representatives to ensure candidates do not pose a child safety risk. These guidelines are implemented in the interviewing of candidates, reference checks and candidate pre-screening. VACD Ltd. will not employ or engage any person if they pose an unacceptable risk to children.

Candidates are also provided with information regarding VACD Ltd. Child Protection values, including a copy of this policy and the Code of Conduct, and asked to disclose any relevant information regarding child safety.

Background checks in Australia:

Any VACD Ltd. member, volunteer or representative directly involved in any VACD Ltd. initiatives will be considered to be undertaking child-related services and must submit to a 'Working with Children Check' from the NSW Office of the Children's Guardian (www.kidsguardian.nsw.gov.au) and a National Police Check with the Australian Federal Police (www.afp.gov.au)

Background checks in Sri Lanka:

All VACD Ltd. members and volunteers in Sri Lanka who are directly involved in any VACD Ltd. initiatives will be considered to be undertaking child-related services and must obtain a Police Clearance Certificate and provide a copy to VACD Ltd. prior to commencing work with children. The Chairman VACD Ltd. Sri Lanka will initiate such checks with the local Sri Lankan authorities in the immediate province and/or where the check needs to be extended to other jurisdictions.

Background checks by project partners

All staff of project partners directly involved in VACD Ltd. initiatives will be considered to be undertaking child-related services and must submit to the relevant child protection background checks applicable in the project partner's country of operation.

F. USE OF VISUAL IMAGES AND WRITTEN PUBLICATIONS:

VACD Ltd. understands and is committed to portraying children in a positive manner in all its marketing and communication materials. VACD Ltd. will at all times:

- Portray children in a dignified and respectful manner and not as vulnerable or submissive;
- Ensure that photographs, films of children and website publications respect and are in the best interest of the 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 their parent/guardian before photographing or filming a child. As part of this VACD Ltd. must explain how the photograph or film will be used;
- Ensure children are adequately clothed and not presented in any way 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;
- VACD Ltd. partners are also required to portray children in a respectful, appropriate and consensual way;
- These principles and the guidelines for conduct are outlined in VACD Ltd. Child Protection Policy and Code of Conduct.

G. CHILD ABUSE REPORTING MECHANISM:

VACD Ltd. will take all reasonable steps to prevent child abuse and to hold accountable those who abuse children. The mechanism for reporting, investigating and resolving complaints of child abuse is as follows:

G1. Reporting:

- a. Any incident, belief or suspicion of sexual or physical abuse (past or present) by VACD Ltd. member, staff, volunteer, consultant, visitor or other representative must be reported immediately to the Chairman or a member of the VACD Ltd. Board;
- b. If the report relates to conduct of a member of the Board, the incident must be reported to the Chairman or another member of the VACD Ltd. Board;
- c. If the incident relates to the Chairman, then incidents will be reported directly to a member of the Board;
- b. Any VACD Ltd. staff member who receives the complaint or disclosure regarding suspected abuse must, as soon as possible, fully document the complaint including the time, place and witnesses to the incident.

G2. Investigation:

- a. If the person complained against, is a member, staff or volunteer of VACD Ltd. then such person is to be stood down while the investigation takes place;
- b. The investigation must not pre-determine guilt or innocence and the person complained against is entitled to a fair and just process;
- c. Allegations should not be discussed with other people until all issues have been considered and a decision made by the Chairman of the Board or other person who is delegated to fulfil the task with a full written report being submitted to the VACD Ltd. Chairman;
- d. The family of the child should be informed of the allegation and the action proposed. They should be consulted where possible on the process to be followed.

G3. Decision:

- a. Following the investigation, the Chairman VACD Ltd. or the delegated person is to make a decision as to whether to terminate the tenure of the person complained against, whether to report the incident to law enforcement agencies (see below), whether further investigation is

required or whether the findings of the investigation have satisfied the Project Leader that the complaint is not founded;

b. VACD Ltd. will not retain any person in a role if the investigation shows that they pose an unacceptable risk to children;

c. The decision made should be documented and filed.

G4. Reporting to law enforcement agencies:

a. If the incident is alleged to have occurred in Australia, the Chairman or Company Secretary VACD Ltd. may contact the police, depending on the nature of the incident, to investigate the allegation;

b. If the incident is alleged to have occurred in Sri Lanka or any other country, the Chairman VACD Sri Lanka or the Chairman of the VACD Ltd. Board of the other country may contact the police or law enforcement authorities of that country, depending on the nature of the incident, to investigate the allegation;

c. ALL allegations of actual physical or sexual assault as defined in this policy must be reported to the police (whether in Australia or in the project country), whether or not the victim has consented to the matter being reported.

G5. Confidentiality:

a. All cases of child abuse are to be handled with utmost care and confidentiality to protect the wellbeing of the child concerned;

b. The name or identity of the child and his or her family must not be disclosed to any person outside VACD Ltd. and may only be documented in the confidential investigation report;

c. Investigation reports and decisions are to be marked confidential and are not to be released to any third party other than law enforcement agencies if required to assist with their investigations.

H. EDUCATION ON CHILD PROTECTION AND THIS POLICY:

VACD Ltd members, staff and volunteers will receive training in issues relating to child protection. All VACD Ltd. members, volunteers, consultants and other representatives of VACD Ltd., and all implementing partners will be made aware of their individual responsibilities to uphold VACD Ltd. Child Protection Policy and Code of Conduct.

Acknowledgement, Acceptance & Agreement:

Upon being admitted to the VACD Ltd. Board, Administration, Fellow or as a volunteer, this document will be given to such a person either in a hard copy or soft copy format and it will be deemed to have been read, understood and agreed upon when this person attends the first general, regular, ad hoc or annual general meeting called by the VACD Ltd. Company Secretary.