

MAA INTERNATIONAL

CHILD PROTECTION POLICY



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TABLE OF CONTENTS

1	Introduction	4
1.1	Purpose	4
1.2	Policy Scope	4
1.2.1	All Direct Personnel And Associates Of MAA:	5
1.2.2	All Indirect Personnel Engaged By MAA:	5
1.3	Roles And Responsibilities	5
1.3.1	Executive Management Are Responsible For:	5
1.3.2	People & Organisation Development Are Responsible For:	5
1.3.3	Managers And Supervisors Are Responsible For:	6
1.3.4	All Employees And Volunteers Are Responsible For:	6
1.4	Legislative And Regulatory Context	6
1.4.1	International	6
1.4.2	Federal Legislation	6
1.4.3	State Legislation	6
1.4.4	Australian Council For International Development	7
1.5	Definitions	7
1.6	How To Use This Policy	8
2	Policy & Procedures	9
2.1	Guiding Principals	9
2.2	Implementation Procedure Of CPP And Code Of Conduct	10
2.3	Recruitment And Screening Procedures	14
2.4	CPP Training Procedure	15
2.5	Sponsorship And Non-Staff Visit Procedures	15
2.5.1	Guideline On Gifts	16
2.6	Report Handling Procedure	17
2.7	Child Protection Implementation Strategy And Reporting Procedures	17
2.7.1	Child Protection Internal Reporting Procedure	18
2.8	Child Protection External Reporting Process	20

2.9	Measures Regarding Breach Of Code Of Conduct	20
3	Revision History	22
ANNEX 1	Child Protection Code Of Conduct.....	23
ANNEX 2	Use Of Children's Images For Work-Related Purposes.....	25
ANNEX 3	Initial Incidence Reporting Form.....	26

1 INTRODUCTION

1.1 PURPOSE

MAA International (MAA) is committed to protecting children, regardless of gender, race, country of origin or religious belief. This policy statement formally expresses MAA's belief and commitment to protecting the rights of all children, which is in line with the United Nations Convention on the Rights of the Child (UNCRC), which states that children should be protected from all forms of physical and mental violence, injury, abuse, neglect, maltreatment and exploitation, including sexual abuse.

This Child Protection Policy (CPP) has been developed to provide a practical guide for all relevant personnel in MAA, volunteers, partners, subcontractors and service providers, in order to prevent any form of child abuse in MAA's aid and development programs. This policy will outline a range of risk management strategies that will be enforced and implemented to reduce the risk of children being harmed. MAA's CPP aims to:

- Demonstrate MAA's commitment to protect children from harm and abuse.
- Educate staff and others about child abuse and promote a child safe and a child friendly culture where everyone is committed to keeping children safe.
- Create an open and aware environment where concerns for the safety and wellbeing of a child can be raised and managed in a fair and just manner, which protects the rights of all.
- Provide guidance on how to respond to concerns and allegations of child abuse. It provides guidance to staff and others on how to work respectfully and effectively with children. This will ensure all stakeholders, including staff and others are working in a safe environment.
- Fulfil MAA's obligations to have policies and procedures implemented which promote the safety and well-being of all children accessing its services and programs, in particular to minimise the risk of abuse to children (See Clause 2.6 of the ACFID Code of Conduct).
- Fulfil MAA's obligations to adhere to local and international child protection criminal laws, which prohibits the abuse and exploitation of children. These include local laws where MAA's programs exist, and international laws and Conventions in relation to all forms of child abuse and child exploitation, including: child sex tourism, child sex trafficking, child labour and child pornography.

This policy sends a clear message that child exploitation and abuse is not tolerated in MAA and attracts disciplinary and commercial sanctions, as well as criminal penalties under Australian domestic and extra-territorial laws.

1.2 POLICY SCOPE

This policy applies to all business units and subsidiaries of MAA, and to all persons employed or engaged by MAA including the following personnel:

1.2.1 All Direct personnel and associates of MAA:

- Permanent, maximum term and casual staff
- Individual contractors and consultants
- Volunteers, interns & work-experience students.
- Board members
- Partners that have a formal/contractual relationship with MAA

1.2.2 All Indirect personnel engaged by MAA:

(People having contact with children for a period of one day or longer)

- Journalists and media personnel
- Photographers
- Donors Supporters
- Guest presenters
- Entertainers
- Visitors including the spouse/partner or family member of MAA personnel or associates

1.3 ROLES AND RESPONSIBILITIES

MAA seeks to involve appropriate personnel in all levels within the organisation including the board members and staff in the process of risk identification and establishment of practical strategies to ensure a firm approach to MAA's CPP.

1.3.1 Executive Management are responsible for:

- Ensuring that all MAA staff members, volunteers and contractors comply with all relevant legislation and MAA's CPP.
- Ensuring that all Partner Organisations and their board members, staff members, volunteers and contractors implementing aid and development programs funded by, or through, MAA comply with MAA's CPP.
- Ensuring the proper use of the Child Protection Risk Assessment at the design, implementation and monitoring and evaluation phase of MAA's aid and development programs, including documented risk treatments.

1.3.2 People & Organisation Development are responsible for:

- Assisting managers and supervisors with the construction of appropriate training and development programs, designed to aid compliance with this policy.
- Providing managers and supervisors 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.
- 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 & Organisation Development 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.

1.3.3 Managers and supervisors are responsible for:

- Ensuring that they comply with all relevant legislation and MAA policies.
- Ensuring all MAA 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 MAA.
- Providing the CEO and People & Organisation Development Director with all information that relates to breaches or potential breaches of this policy.
- Seeking support and assistance from People & Organisation Development as required

1.3.4 All employees and volunteers are responsible for:

- Acting in the best interests of the health, safety and welfare of any child encountered during the delivery of MAA's activities 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.

1.4 LEGISLATIVE AND REGULATORY CONTEXT

MAA ensures that it complies with and implements all relevant International, Australian Commonwealth and state and territory laws to ensure the protection of children.

1.4.1 International

- The United Nations Convention on the Rights of the Child
- Geneva Declaration of the Rights of the Child

1.4.2 Federal Legislation

- Criminal Code Act 1995
- Crimes Act 1958

1.4.3 State Legislation

- New South Wales: The Children and Young Persons (Care and Protection) Act 1998
- Australian Capital Territory: Children and Young Persons Act 1999
- Northern Territory: The Community Welfare Act

- Queensland: The Child Protection Act 1999
- 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
- WA: Children and Community Services Act 2004

1.4.4 Australian Council for International Development

- ACFID Code of Conduct

1.5 DEFINITIONS

The following terms are used in this policy document and are defined as follows:

- **Duty of Care:** This 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.
- **Child and young person:** A child or young person is regarded to be any person under the age of 18 years, unless a nation's laws recognise adulthood earlier.
- **Child Protection:** Is the term used to describe the responsibilities and activities undertaken to prevent or stop children being abused or maltreated.
- **Child Abuse:** 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 domestic violence. Both boys and girls can be the victims of abuse, and 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.
- **Physical abuse:** This 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:** This 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 non-contact acts, including threats and exposure to pornography.
- **Bullying:** Is the inappropriate use of power by an individual or group, with an intent to injure either physically or emotionally. It is usually deliberate and repetitive. The bullying may be physical or psychological (verbal and non-verbal). Physically, bullying includes pushing, hitting, punching, kicking or any other action causing hurt or injury. Verbal bullying includes insults, taunts, threats and ridicules. Psychological bullying includes physical intimidation and ostracism.

- **Domestic violence** occurs when children and young people witness or experience the chronic domination, coercion, intimidation and victimisation of one person by another by physical, sexual or emotional means within intimate relationships. (adapted from the Australian Medical Association definition)
- **Particularly vulnerable children:** Child abuse takes place not only within the family environment, but also outside the family, including institutions, at work, on the streets, in war zones and emergencies.
- **Children in emergencies:** are especially vulnerable to abuse and exploitation. In an emergency or crisis situation, children are extremely vulnerable when they become part of a displaced or traumatised population.

1.6 HOW TO USE THIS POLICY

Section 1 of this document explains the purpose and scope of this policy. This section also identifies the important legal regulations and recognized codes of conduct that was used in developing this policy. Significant roles and responsibilities all MAA personnel as well as definitions have also been described in this section.

Section 2 of this document explains the guiding principles used in the development of MAA's CPP. This section provides all necessary procedures that must be undertaken to ensure the effectively protect the rights and safety of children within MAA's programs. This section details the necessary reporting procedures in the case of breach of this policy.

ANNEX: this section contain MAA's Child protection Code of Conduct, Use of Children's images and an initial incident reporting form respectively.

2 POLICY & PROCEDURES

2.1 GUIDING PRINCIPLES

MAA believes that any form of child abuse and exploitation is unacceptable and will not be tolerated. The following statements guide MAA's CPP procedures:

- (a) The United Nations Convention on the Rights of the Child is the universal foundation for child protection.
- (b) Fundamental principle of the Convention is that children have their own indivisible rights.
- (c) MAA's firm belief is that all children have a right to be safe at all times, have an obligation to provide safe and protective services and environments.
- (d) MAA recognizes its duty of care to take all reasonable steps to ensure that children are safe from harm.
- (e) MAA's continuous effort and proactive steps to create child safe and child friendly programs.
- (f) Adherence to this CPP is a mandatory requirement for all staff and others.
- (g) Ensuring that all staff and relevant stakeholders are made aware of the CPP and their responsibilities.
- (h) All decisions regarding the welfare and protection of children are made based on the Best Interests of the Child Protection Principle. This principle refers to decisions considering that the child receives maximum benefit possible from services provided, and that the positive impacts of any course of action outweigh any negative impacts.
- (i) Where possible, children will be consulted in the development of the CPP and the implementation of child safe practices.
- (j) Children in our programs to be given opportunities to express their views on matters affecting them.
- (k) MAA's firm belief is that all children should be equally protected and assisted regardless of their gender, nationality, religious or political beliefs, family background, economic status, physical or mental health or criminal background.

MAA's commitment to child protection is based on the following principles:

- (a) Promoting and protecting the best interests of children at all times
- (b) Zero-tolerance towards all forms of child abuse
- (c) Shared responsibility towards child protection in the organisation, including all personnel and associates, its partners and the communities in which it works
- (d) Including the views of children and young people to inform the child protection policy and program development.

2.2 IMPLEMENTATION PROCEDURE OF CPP AND CODE OF CONDUCT

The Policy does not need to be signed by people engaged by MAA for less than one day, and/or who will have no contact with children. These people must be made aware of the Policy, MAA's child protection standards and be supervised by an MAA staff member at all times.

The Child Protection Policy and Code of Conduct will be implemented through: -

- (a) Read, understand and adhere to the Child Protection Implementation Guidelines – an Australian and International version of the Guidelines are available on the MAA Intranet. A hard copy is available in each office. The Guidelines provide procedures, practical tools and templates as well as detailed information to implement the Policy and Code of Conduct.
- (b) Read, understand and adhere to MAA's Child Protection Code of Conduct (Annex A) all personnel, associates and representatives of MAA are required to sign the Policy and Code of Conduct (outlines acceptable and unacceptable behaviour in relation to children. A breach of the Code may result in termination of employment) agreeing to comply with the principles and standards they contain. All personnel are encouraged to discuss this Policy and Code of Conduct at the commencement of their employment/engagement with MAA if they have any questions or concerns. Personnel should contact the Compliance Manager to do this.
- (c) Reporting of alleged or suspected cases of child abuse – all personnel, associates and representatives of MAA must report any concerns they have for the safety or wellbeing of a child. Reports will be handled professionally, confidentially and as quickly as possible and will meet country, state or territory specific legislative requirements. Any person who intentionally makes a false allegation or malicious allegation will face disciplinary action.
- (d) Read, understand and adhere to MAA's Child Protection Risk Management – effective child abuse prevention strategies will be incorporated in all MAA program designs, activities and emergency responses.
- (e) Understand and implement MAA's Recruitment of personnel and associates management practices – prospective and current personnel will be screened and monitored to ensure the organisation does not employ, engage or retain people who pose an unacceptable risk to children.
- (f) MAA makes it very clear that any employee, contractor, partner who presents an unacceptable risk to children will be prevented from working with children. This will be included in the MAA's employee handbooks and will be read and acknowledged.

2.3 PARTICIPATION OF CHILDREN IN DEVELOPMENT AND HUMANITARIAN INITIATIVES

Child Protection in Development

- (a) Assure to the child who is capable of forming his or her own views the right to express those views freely in all matters affecting the child, the views of the child being given due weight in accordance with the age and maturity of the child.

- (b) For this purpose, the child shall in particular be provided the opportunity to be heard in any judicial and administrative proceedings affecting the child, either directly, or through a representative or an appropriate body, in a manner consistent with the procedural rules of national law.
- (c) The child shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of the child's choice.
- (d) Recognise that a mentally or physically disabled child should enjoy a full and decent life, in conditions which ensure dignity, promote self-reliance and facilitate the child's active participation in the community. Also recognise the right of the disabled child to special care and shall encourage and ensure the extension, subject to available resources, to the eligible child and those responsible for his or her care, of assistance for which application is made and which is appropriate to the child's condition and to the circumstances of the parents or others caring for the child.
- (e) Recognise the right of the child to the enjoyment of the highest attainable standard of health and to facilities for the treatment of illness and rehabilitation of health. States Parties shall strive to ensure that no child is deprived of his or her right of access to such health care services.
- (f) Recognise the right of the child to education, and with a view to achieving this right progressively and on the basis of equal opportunity, they shall, in particular:
 - Make primary education compulsory and available free to all;
 - Encourage the development of different forms of secondary education, including general and vocational education, make them available and accessible to every child, and take appropriate measures such as the introduction of free education and offering financial assistance in case of need;
 - Make higher education accessible to all on the basis of capacity by every appropriate means
 - Make educational and vocational information and guidance available and accessible to all children;
 - Take measures to encourage regular attendance at schools and the reduction of drop-out rates.
- (g) Recognise the right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development.

Child Protection in Humanitarian Action

HUMANITARIAN ACTION: The objectives of humanitarian action are to save lives, alleviate suffering and maintain human dignity during and in the aftermath of man-made crises and natural disasters, as well as to prevent and strengthen preparedness for the occurrence of such situations. Humanitarian

action has two inextricably linked dimensions: protecting people and providing assistance (see Humanitarian response). Humanitarian action is rooted in humanitarian principles – humanity, impartiality, neutrality and independence.

HUMANITARIAN RESPONSE: Humanitarian response is one dimension of humanitarian action (see Humanitarian action, above). It focuses on the provision of assistance in a given emergency situation.

In the initial humanitarian response, urgent child protection needs in an emergency are likely to include interim care for unaccompanied and separated children, family tracing, quick interventions to prevent families from being separated, psychosocial support for distressed children and their families, and protection from different kinds of violence and risks such as recruitment into armed forces or groups or other forms of exploitation. In most cases, families and those from the affected community will naturally respond to these needs as best they can, and outside agencies may find ways to support and supplement these efforts.

Humanitarian action for child protection also involves preparedness, including the strengthening of child protection systems before, during and after an emergency, to increase state, community, family and child resilience to the emergency and mitigate its effects.

- (h) **SURVIVAL AND DEVELOPMENT** - As well as children's right to life, humanitarian workers must also consider the effects of the emergency and the response on the physical, psychological, emotional, social and spiritual development of children.
- (i) **NON-DISCRIMINATION** - Emergencies often magnify existing differences and further marginalise those already at risk of discrimination. Humanitarians must identify and monitor existing and new patterns of discrimination and power and tackle them in the response.
- (j) **CHILD PARTICIPATION** – Humanitarian workers must ensure that girls and boys are given space and time to meaningfully participate at all possible stage of an emergency preparedness and response. Boys and girls of different ages and abilities, and with different perspectives should be supported to express their views in safety, and these views should be regarded with respect and taken seriously. Humanitarian workers must be aware of their own values, beliefs and assumptions about childhood and the roles of the child and the family, and avoid imposing these on children. They should enable developmentally appropriate ways of child participation, share power with children in decision making, and be sensitive to how children's participation can, when done poorly, upset children's social roles and power relations.
- (k) **THE BEST INTERESTS OF THE CHILD** – In all actions concerning children, the best interests of the child shall be a primary consideration. This principle should guide the design, monitoring, and adjustment of all humanitarian programme and interventions. Where humanitarians take decisions regarding individual children, agreed procedural safeguards should be implemented to ensure this principle is upheld.
- (l) Those involved in humanitarian response must do all they reasonably can to avoid exposing people affected by disaster or armed conflict to further harm, in particular the risk of exposing children to increased danger or abuse of their rights.

- (m) Ensure that humanitarian assistance is available to all those in need, particularly those who are most vulnerable or who face exclusion on political or other grounds. Assistance is provided without discrimination and is not withheld from children in need or their families and caregivers, and access for humanitarian agencies is provided as necessary to meet the standards.
- (n) Children are protected from violence, from being forced or induced to act against their will, and from fear of such abuse. Although the primary responsibility to protect children from harm rests with government, all child protection responses should seek to make children more secure, facilitate children's and families' own efforts to stay safe, and reduce children's exposure to risks.
- (o) Children are assisted to claim their rights, through information, documentation and assistance in seeking remedies. Children are supported appropriately in recovering from the physical, psychological and social effects of violence and other abuses.
- (p) In humanitarian settings, the people, processes, laws, institutions and behaviours that normally protect children – the child protection systems – may have become weakened or ineffective. However, the response phase may provide an opportunity to develop and strengthen national child protection systems, including community-based systems.
- (q) Although children are often portrayed as passive and dependent, they are naturally active participants in their families and communities. Before a crisis, many children have family responsibilities, take their own decisions, and may be leaders in their schools or peer groups. During crises, children attempt to cope with the added risks and pressures that emergencies bring by problem solving or obtaining support from others, including family members and other such as peers or religious leaders.

How successful children are in addressing and coping with their situation depends on the pattern of risks and protective factors in their social environments, and also on their internal strengths and capabilities. Vulnerability arises when a child faces multiple risks and has few protective factors, such as living with a caring parent, having supportive friends, and having good skills for seeking help. Resilience arises when a child has more protective factors than risk factors. Similarly, children with strengths such as good problem-solving skills are often able to navigate the crisis environment relatively effectively, and to make decisions that support their wellbeing and that of their families.

From this standpoint, the task of child protection programming in emergencies is to strengthen protective factors that reinforce children's resilience, and to deal with those that expose children to risk. In designing programmes that strengthen resilience and deal with threats, and which support positive relations between children, families, and communities, the following questions are relevant:

- Are programmes accessible to all children, and do they build on and reinforce children's skills and strengths? Consider the characteristics of individual children they may

- influence their vulnerability or resilience (for example, their age, ability, ethnic background, language, sex, health, mental, health, religion, and so on).
- Do programmes involve those close to children, and reinforce supportive relationships between children and their parents, caregivers, peers and other important people? Consider the characteristics of children’s family relationships and other close relationships (for example, care arrangements, close and supportive family environments, positive relationships with peers and teachers, and so on).
 - Do programmes strengthen the structures, practices and services that help to protect children in the community? Consider the roles, skills, accessibility and regulation of community leaders, groups, institutions and services. For example, identify aware and active leaders, relevant information about child protection risks, accessible and child-friendly health centres, skills and available social workers, and so on.
 - Are programme taking account of the social and legal norms that influence children’s lives and circumstances? Consider the legal context and the culture and how these affect children’s safety and wellbeing (for example, laws and policies, regulation practices, economic activities, cultural and religious beliefs, structural inequalities, and so on).
 - Do programmes tie all of the above elements together and take a consistent approach? Consider the relationships between children, other children, families, communities and cultures, and how one part influences the others.

2.4 RECRUITMENT AND SCREENING PROCEDURES

Recruitment and screening of personnel and associates must reflect MAA’s commitment to protect children by ensuring checks and procedures are in place to screen out anyone who may be unsuitable to be in contact with children and young people and attract the safest people who share MAA’s values and commitment to protecting children.

This Policy commits MAA to preventing a person from working with children if they pose an unacceptable risk to children.

All employment contracts must contain provisions for dismissal, suspension or transfer to other duties for any personnel who breaches the Child Protection Policy and Code of Conduct.

MAA has a robust recruitment and screening process for all personnel and associates, which are strictly implemented. These are:

- (a) Criminal history check prior to engagement

- (b) Child protection interview question
- (c) Two verbal reference checks - including question relating to the applicant's general conduct.
One reference must be from the person's current or most recent employer
- (d) Sign the Child Protection Policy and Code of Conduct prior to engagement
- (e) Once engaged, attend a Child Protection Policy training session.

Additional procedures for those working with children or having access to child sensitive data include:

- (a) Targeted/behavioural based interview questions used to determine attitudes, motivations, and values in regards to children and young people and working with them.
- (b) Reference check to include questions regarding any concerns about candidate's conduct when working or interacting with children and young people
- (c) These procedures must be evidenced by:
 - i. Documented criminal record checks for personnel and associates in contact with children
 - ii. Documented verbal referee checks
 - iii. Interview plans incorporating behavioural-based interview questions that are specific to positions that involve working with children
 - iv. Documented request for an applicant to disclose whether they have been charged with child exploitation offences and their response.

2.5 CPP TRAINING PROCEDURE

The following training plan must be implemented: -

- 1- All permanent, maximum term and casual staff and Board Members of MAA must attend a Child Protection Policy training session within six months from the commencement of their employment or appointment.
- 2- All permanent, maximum term, casual staff and Board Members of MAA should attend a refresher Child Protection Policy training session every two years.
- 3- 3-All other personnel and associates of MAA must be provided with an induction on the Policy and Code of Conduct
- 4- International MAA Field Partners who do, or may, have direct contact with children are inducted with MAA's CPP through inductions/workshops- 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.

2.6 SPONSORSHIP AND NON-STAFF VISIT PROCEDURES

Notice of interest to visit children under an MAA Orphan Aid Program by a non-staff visitor must be given to MAA no less than 2 months prior to the intended visit date.

In order to ensure all reasonable precautions are taken to protect children, MAA will ensure compliance with all visit requirements prior to authorizing a non-staff visitor to visit a child.

These requirements will include the completion of all necessary forms requested by MAA as well as full identification details to enable us to compile a police background report. MAA recognises the need to implement specific guidelines to manage the child protection risks within its sponsorship programs. The following guidelines and procedures must be implemented and followed by all sponsors who take part in sponsorship programs which may involve contact with child/ren:

- (a) Letters which contain political or religious comments, which could cause offence or be inappropriate, are not permitted
- (b) All sponsors will receive clear child protection and behavioural guidelines upfront
- (c) All visits should be arranged in advance through our office and sponsors interviewed
- (d) Sponsors inform the agency at least 3 months in advance
- (e) Police checks are required for visiting sponsors and any accompanying family members
- (f) All visiting sponsors will sign the Child Protection Policy
- (g) Partner agency staff will be present at all times during the visit
- (h) Children should not be invited to leave or be taken away from their communities
- (i) Invitations to the sponsor's country are not allowed
- (j) Sponsors will be interviewed before each visit
- (k) All gifts and correspondence will be screened by the agency
- (l) Sponsors and sponsored families should not exchange mailing addresses during visits
- (m) After every visit a report will be sent to the head office
- (n) All visits will be monitored
- (o) Where sponsors go against policies the organisation can bring sponsorship to a close

MAA has the right to reject or cancel a non-staff visit if the information received is incomplete or insufficient or if the police background report contains information which may disqualify the visitor to visit a child.

Furthermore, non-staff visitors must respect the dress standards of other cultures and while visiting, must dress appropriately as to avoid offence. Jewellery or any other expensive possessions should not be worn or taken while visiting as to avoid damaging effects.

When a non-staff visitor arrives unannounced at one of our partner or field offices, he/she will **not** be granted the automatic right to visit a child/children and he/she will be deemed 'unauthorized'.

2.6.1 Guideline on Gifts

MAA understands that it can be a great feeling to give a child a gift of things they probably can never afford. As this may brighten the day of one child, it will bring sadness to all the others.

MAA does not authorize a non-staff visitor under any circumstances to give a gift of any sort directly to a child.

A non-staff visitor may alternatively like to contribute financially or in kind towards the field office or partner NGO who is caring for the child.

2.7 REPORT HANDLING PROCEDURE

The Child Protection Reporting Process must be followed when reporting a concern for the safety or wellbeing of a child or a breach of this Policy and/or Code of Conduct.

MAA will treat all concerns raised seriously and ensure that all parties will be treated fairly and the principles of natural justice will be a prime consideration.

Where required, an internal investigation will be conducted in regards to a report being made. In most cases the investigation will be conducted by the Compliance manager or the CEO.

MAA must immediately notify the Department of Foreign Affairs and Trade (DFAT), Child Protection Compliance Section, if any DFAT Australian Aid funded personnel, or DFAT Australian Aid partner personnel, are accused of, charged with, arrested for, or convicted of criminal offences relating to child exploitation and abuse. These reports must be immediately reported to the CEO.

Children and young people, parents/guardians and community members involved in MAA's programs or activities should be informed on how to raise a concern about their safety or wellbeing or that of another child. This can be done verbally or in written form. Personnel and associates must inform their Manager if they believe they or a member of their family may be at risk of harm for making or being part of making a child protection report.

2.8 CHILD PROTECTION IMPLEMENTATION STRATEGY AND REPORTING PROCEDURES

The Child Protection Reporting Process for Internal or External incidences must be followed when reporting a concern for the safety or wellbeing of a child or a breach of this Policy and/or Code of Conduct.

MAA will treat all concerns raised seriously and ensure that all parties will be treated fairly and the principles of natural justice will be a prime consideration.

Where required, an internal investigation will be conducted in regards to a report being made. In most cases the investigation will be conducted by the Compliance manager or the CEO. Reporting of any breach of this policy and Code of Conduct is critical (See Annex 3 for initial report incidence form)

MAA must immediately notify the Department of Foreign Affairs and Trade (DFAT) Child Protection Compliance Section if any DFAT Australian Aid funded personnel, or DFAT Australian Aid partner personnel, are accused of, charged with, arrested for, or convicted of criminal offences relating to child exploitation and abuse. These reports must be immediately reported to the CEO.

Children and young people, parents/guardians and community members involved in MAA's programs or activities should be informed on how to raise a concern about their safety or wellbeing or that of

another child. This can be done verbally or in written form. Personnel and associates must inform their Manager if they believe they or a member of their family may be at risk of harm for making or being part of making a child protection report

2.8.1 Child Protection Internal Reporting Procedure

The following procedure should be followed for reports concerning an alleged breach of the Child Protection Policy and/or Code of Conduct, allegations or suspicions of child abuse having been committed, or concerns/information about the actions or behaviour of MAA, associates or representatives.

WHO CAN REPORT	<ul style="list-style-type: none"> • Child or Young person • Parents/guardians/ Community members • Personnel, associates or Representatives of MAA
WHAT TO REPORT	<ul style="list-style-type: none"> • Allegations, suspicions, disclosures or observations of child abuse committed by personnel, (Annex 3) • associates or representatives of MAA or • Concerns about the action or behaviour of personnel, associates or representatives of MAA that has harmed or put a child at risk of harm or • Suspected or confirmed breaches of the CP Policy and/or Code of Conduct by personnel, associates or representatives of MAA or • Information received of criminal proceedings being undertaken in regards to child exploitation and abuse against personnel, associates or representatives of MAA.
WHEN TO REPORT	<ul style="list-style-type: none"> • Immediately or as soon as it is practically possible
WHO TO REPORT TO	<ul style="list-style-type: none"> • Compliance Manager/ CEO • Child exploitation and abuse allegations, criminal proceedings undertaken or serious and/or repeated breaches of the Policy and Code immediately reported to the Compliance Manager or CEO
WHAT WILL HAPPEN	<ul style="list-style-type: none"> • Assessment of severity of the report by Compliance manager or CEO • CEO will report child exploitation and abuse allegations and any criminal proceedings to MAA International and DFAT as required • All parties' safety needs must be assessed and responded to including the child/ young person/ family members/ person against whom the report is made/ personnel and associates

**POSSIBLE
OUTCOMES**

- Meetings to discuss breach and opportunity for person to provide their account/understanding of the situation
- Performance Management
- Further education on the CP Policy and Code of Conduct
- Formal warning and monitoring
- Transfer to other duties
- Suspension pending investigation
- Internal and/or criminal investigation
- Report to Police
- Dismissal

FOLLOW UP

- Feedback to be given where possible to those directly involved or affected, protecting confidentiality and privacy. Debriefing/counselling to be offered, if needed

2.9 CHILD PROTECTION EXTERNAL REPORTING PROCESS

This Process should be followed for reports concerning the safety or wellbeing of a child or young person involved in MAA programs or in the community.

WHO CAN REPORT	<ul style="list-style-type: none"> • Child or Young person • Parents/guardians/ Community members • Personnel, associates or Representatives of MAA
WHAT TO REPORT	<ul style="list-style-type: none"> • Allegations, disclosures or observations of child abuse or concerns for the safety or wellbeing of a child or young person. (Annex 3)
WHEN TO REPORT	<ul style="list-style-type: none"> • Within 24 hours or as soon as practically possible - if after hours and a child is at serious risk of harm, immediately report to the local child protection statutory authority or police.
WHO TO REPORT TO	<ul style="list-style-type: none"> • Project Manager/CEO
WHAT WILL HAPPEN	<ul style="list-style-type: none"> • Meeting (team meeting) to discuss further action • CEO contacted for further advice or to report a high risk/complex report
POSSIBLE OUTCOMES	<ul style="list-style-type: none"> • Report made to child protection statutory authority/government department • Report made to community-based child protection committee or similar • Report made to Police • Referral made to local support/counselling organisation or service • All parties' safety needs must be assessed and responded to – child/young person/family members/person against whom the report is made/personnel, and associates
FOLLOW UP	<ul style="list-style-type: none"> • Feedback to be given where possible to those directly involved or affected, protecting confidentiality and privacy. Debriefing/counselling to be offered, if needed.

2.10 MEASURES REGARDING BREACH OF CODE OF CONDUCT

The following measures will be applied in the case where any personnel, associate or representative breaches MAA's CPP and/or Code of Conduct:

- (a) Meeting to discuss breach and opportunity for person to provide their account/understanding of the situation
- (b) Performance management
- (c) Further education on the Child Protection Policy and Code of Conduct

- (d) Formal warning and monitoring
- (e) Transfer to other duties
- (f) Suspension pending investigation
- (g) Internal investigation
- (h) Report to Police
- (i) Dismissal

These measures will apply alongside any criminal investigation, where relevant.

3 REVISION HISTORY

Document version details	
Version identifier:	V5.3
Date amended:	31 December 2025
Approved by CEO:	Ahmad Malas
Review date:	31 December 2026 or as required

ANNEX 1 CHILD PROTECTION CODE OF CONDUCT

Staff members and others 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. All staff should conduct themselves in a manner consistent with their role as an MAA representative and a positive role model to children. MAA has developed a child safe code of conduct to protect children, staff and the organisation by providing clear behavioural guidelines and expectations. MAA's child safe code of conduct includes:

I WILL:

- (a) Treat all children and young people in our program with respect.
- (b) Conduct myself in a manner that is consistent the values of MAA.
- (c) Provide a welcoming, inclusive and safe environment for all children, young people, parents, staff and volunteers.
- (d) Respect cultural differences.
- (e) 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.
- (f) Report any concerns of child abuse.
- (g) At all times staff should be transparent in their actions and whereabouts.
- (h) Take responsibility for ensuring they are accountable and do not place themselves in positions where there is a risk of allegations being made.
- (i) Self-assess their behaviours, actions, language and relationships with children.
- (j) Speak up when they observe concerning behaviours of colleagues.
- (k) Act of banning of provision/supply of alcohol or drugs to children in the Child Protection code of Conduct

I WILL NOT:

- (l) Engage in behaviour that is intended to shame, humiliate, belittle or degrade children.
- (m) Use inappropriate, offensive or discriminatory language when speaking with a child or young person.
- (n) Do things of a personal nature that a child can do for him/herself, such as assistance with toileting or changing clothes.
- (o) Take children to their own home/hotel or sleep in the same room or bed as a child.
- (p) Smack, hit or physically assault children.
- (q) Develop sexual relationships with children or relationships with children that may be deemed exploitative or abusive.
- (r) Behave provocatively or inappropriately with a child.

- (s) Participate in the treatment of children that is illegal, unsafe or abusive.
- (t) Act in a way that shows unfair and differential treatment of children.
- (u) Photograph or video a child without the consent of the child and his/her parents or guardians (medium (see also 'Use of children's images for work-related purposes' below)
- (v) Hold, kiss, cuddle or touch a child in an inappropriate, unnecessary or culturally insensitive way.
- (w) Seek to make contact and spend time with any child or young person outside the program times.
- (x) Use MAA's computers, mobile phones, video and digital cameras inappropriately, nor use them for the purpose of exploiting or harassing children.
- (y) Accept a gift or benefit where there could be a perception that it has been offered as an inducement to act in a certain way.

I, _____ (Full name as shown on photo ID) as undersigned below, have read and understood and hereby agree to abide by this Child Protection Policy and Child Protection Code of Conduct.

Signature: _____

Date _____.

ANNEX 2 USE OF CHILDREN'S IMAGES FOR WORK-RELATED PURPOSES

When photographing or filming a child for work-related purposes, I must:

- (a) Assess and endeavour to comply with local traditions or restrictions for reproducing personal images **before** photographing or filming a child,
- (b) Obtain consent from the child or a parent or guardian of the child **before** photographing or filming a child. As part of this I must explain how the photograph or 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. Children should be adequately clothed and not in poses that could be seen as sexually suggestive
- (d) Ensure images are honest representations of the context and the facts
- (e) 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, _____ (Full name as shown on photo ID) as undersigned below, have read and understood and hereby agree to abide to the above statements.

Signature: _____

Date _____.

ANNEX 3 INITIAL INCIDENT REPORTING FORM

Name of reporting staff/volunteer/partner	
Name of Senior Staff member onsite	
Name of impacted child/ren or persons	
Date and Time of incident	
Time of report	
Location of Incident	
Description of incident	
Has this incident been reported to the Child Protection Officer?	Name of CPO: Time reported:
Signature of reporting staff/volunteer/partner:	Date:
Signature of senior staff/volunteer/partner:	Date:
Signature of Child Protection Officer	Date:
Other Notes:	