

CHILD SAFEGUARDING POLICY & PROCEDURES

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| VERSION | 4 |
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POLICY AMENDMENTS

This is a working document and subject to amendment. This Policy will be available in English, Hebrew and Arabic.

Any suggestions about this Policy should be directed to the Rozana Australia CEO so changes can be considered. Any amendments or changes to the Policy will be submitted to the Board for endorsement.

The CEO is responsible for maintaining this document, including updating confirmed changes, informing staff of the changes, and disseminating the latest version across the organisation.

Any changes or amendments involve the following steps:

- Updating the Document Version table on the first page;
- Updating the relevant provision in this manual;
- Replacing the updated version of the manual e.g., shared drives, Intranet;
- Printing a hard copy of the updated manual for the office;
- Communicating the changes to all staff; and
- Archiving the old version of manual.

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1. PREAMBLE

This policy was written by Rozana in Australia. It may be used as a template across all Rozana offices. Rozana operates five offices registered in each of Australia, USA, Canada, UK and Israel, which are part of the Rozana Global Alliance. In this policy, 'Chair' means Chair of Rozana International. Unless specified otherwise the 'Board' refers to the board of Rozana Australia.

This Policy will be reviewed every two years.

2. BACKGROUND

Rozana works indirectly with children through its partner training, transportation and treatment programs in Palestine and Israel. We believe that child safeguarding is both an organisational and an individual responsibility. Every person who shares in the work of Rozana including Board members, specialist advisors, program partners, volunteers, sponsors and supporters, also share the responsibility to take every precaution to protect the children and families we assist and to adhere to the guidelines and expectations in this policy.

The partnerships include programs covering transportation of children and their caregivers from homes in the West Bank to hospitals in Israel; Summer Camps and Fun Days; training and professional development programs in hospitals, and treatment in Israeli hospitals.

Rozana is serious about its responsibility to ensure that its funding recipient partners commit to care for, protect and uphold the rights of children, regardless of their gender, age, race, disability, religion, political persuasion, social status, pregnancy, cultural background or sexuality, need to be equally protected from abuse. The Child Safeguarding Policy outlines the implementation procedures for this commitment.

3. OBJECTIVE

- To protect all children that Rozana directly or indirectly has contact with.
- To ensure that all of the principles and procedures outlined in this policy are upheld and implemented by all Rozana and partner organisation employees and volunteers.

4. PURPOSE

The purpose of this Child Safeguarding Policy is to ensure, as far as possible, the safety and wellbeing of all children who are involved in our partner programs and projects. In order to achieve its mission to build bridges to better understanding between Palestinians and Israelis through health, Rozana expects its partner recipients to act in the best interests of the child, and to uphold local legislative requirements pertaining to the safety and safeguarding of children. The intention is to promote a culture of child safety within the organisation and to fulfill all Rozana's legal obligations.

Rozana determines a partners' status as a child-safe organisation by including child safeguarding in our partner appraisal process using the Child Protection Risk Context Assessment Template shown in Appendix D which is taken from the *DFAT Child Protection Guidance Note Establishing Child Protection Risk Context*. Most local program partners will have their own policies and procedures in relation to providing safety and safeguarding to children. Where a partner does not have their own Child Safeguarding Policy and Procedures in place, Rozana will work with them to develop their own documents in line with accepted minimum standards including the ACFID Code of Conduct and DFAT's Minimum Child Protection Standards — both of which form the basis for Rozana's Child Safeguarding Policy.

This policy aims to clearly outline definitions of child abuse and other relevant terms, our commitment to children's rights and Child Safeguarding and other relevant risk management approaches for partners to ensure Child Safeguarding. This information will include the procedure for reporting allegations of child abuse against Rozana members of staff or the staff and volunteers of local development partners.

5. SCOPE

This policy applies to Rozana Representatives: all individuals and institutions who act on behalf of Rozana regardless of whether or not there is a formal legal agreement between them and Rozana. This includes, but is not limited to, all directors, employees, contractors, consultants, advisors, volunteers and implementing partners irrespective of which country their role is situated and the organisation's partners including their employed staff and volunteers.

For the purpose of this policy, stakeholder responsibilities have been divided into three categories based on level of interactions with children. See full risk matrix in Appendix D for details.

Table 1. Levels of interaction with children

| Low Risk | Medium Risk | High Risk |
|---|---|--|
| Rozana stakeholders who do not work directly with children. <i>(For example, Rozana staff in offices outside of Israel, as well as Israel staff members not directly involved in program delivery or program management)</i> | Rozana stakeholders who have Contact with Children (see definition in Section 6) | Rozana stakeholders who work directly with children (see definition in Section 6) |

6. DEFINITIONS

Bullying “is aggressive behaviour that is intentional and that involves an imbalance of power or strength. Bullying occurs when a person is subjected to negative behaviour, repeated over a period of time, by another [person].” Bullying can take many forms:

Direct Bullying: “teasing, verbal attacks, shoving, assaults, extortion, and destruction of property.”

Indirect Bullying: “shunning, spreading rumours, malicious practical jokes, and similar verbal behaviour.”

Cyber-Bullying: “use of Internet technology, including social websites, text messaging and emails” that results in aggressive behaviour as defined above. (UNICEF, 2007)

Child means “every human being below the age of eighteen years” (Source: Article 1 of the CRC.) (UNICEF, 2010)

Child Emotional Abuse refers to “inappropriate verbal or symbolic acts toward a child and/or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Emotional abuse includes rejecting, isolating, terrorising, ignoring and corrupting.” (Australian Institute of Family Studies: Child Family Community Australia, 2013)

Child Exploitation “(In the context of child trafficking) shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs. (Source: Article 3 of the ‘Palermo Protocol, adopted in 2000, entered into force in 2003.)” (UNICEF, 2010)

Child Sensitive means “an approach that balances the child’s right to Safeguarding and that takes into account a child’s individual needs and views (Source: UN Guidelines on Justice in matters involving child victims and witnesses of crime, 2005).” (UNICEF, 2010)

Child Trafficking is the “recruitment, transportation, transfer, harbouring or receipt of children for the purpose of exploitation. It is a violation of their rights, their well-being and denies them the opportunity to reach their full potential.” (UNICEF, 2010)

Exposure to Domestic Violence is broadly defined as a “child being present (hearing or seeing) while a parent or sibling is subjected to physical abuse, sexual abuse or psychological maltreatment, or is visually exposed to the damage caused to persons or property by a family member’s violence.” (Australian Institute of Family Studies: Child Family Community Australia, 2013)

Child Physical Abuse is “the non-accidental use of physical force against a child that results in harm to the child. Physical abuse behaviours include shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning. Fabrication or induction of an illness by a parent/carer is also considered physically abusive behaviour.” (Australian Institute of Family Studies: Child Family Community Australia, 2013).

Child Sexual Abuse includes: a) “Engaging in sexual activities with a child who, according to the relevant provisions of national law, has not reached the legal age of sexual activities; b) Engaging in sexual activities with a child where: - use of coercion, force or threats; - abuse is made of a recognised position of trust, authority or influence over the child, including within the family; abuse is made of a particular vulnerable situation of the child, notably because of a mental or physical disability or a situation of dependence.”

Contact with Children means being engaged in an activity or in a position that involves or may involve contact with children, either under the position description or due to the nature of the work environment. This means physical contact, face-to-face contact, oral communication, written communication or electronic communication.

Examples include:

- Any international work, in particular working in remote/rural locations;
- Oral and written communication (including electronic communication) relating to a child;
- Access to data relating to a person under 18;
- Public diplomacy, official functions, visits or other communication activity involving photography, filming, videoing or social media activity where children are present;
- Visiting premises e.g., schools, health or residential facilities, that provide services to children;
- Any community consultation (data collection, surveying, training);
- Women and Gender-focussed activities;
- Health Sector Programs.

Sexual Assault is any type of sexual contact or behaviour that occurs without the explicit consent of the recipient. (US Department of Justice, 2016).

Working with Children means being engaged in an activity with a child where the contact would reasonably be expected as a normal part of the activity and the contact is not incidental to the activity. Working includes volunteering or other unpaid work.

Examples include activities or services for children:

- Disability service
- Cultural youth exchange
- Residential care
- Child protection services
- Justice facilities for children
- Childcare services
- Child education services, Children in sports
- Child accommodation services
- Health services, Access to Sexual & Reproductive Health
- Counselling and support services for children
- Transporting children
- Emergency response, Humanitarian assistance to children and families

7. GUIDING PRINCIPLES

Principle 1. Zero tolerance of child abuse.

Rozana does not tolerate any form of child abuse or child exploitation and is committed to working with its partners to identify, mitigate, manage or reduce the risks to children who are associated with Rozana funded programs. Rozana will not knowingly engage or partner — directly or indirectly — with anyone who poses a risk to children. Rozana works to minimise the risks of child exploitation and abuse associated with its functions and programs and trains its staff and partners on their obligations under this policy.

Principle 2. Assess and manage Child Safeguarding risk and impact

While it is not possible to entirely eliminate risks of child exploitation and abuse, careful child-safe recruitment and screening procedures and child-focused management can identify, mitigate, manage or reduce the risks to children that may be associated with functions and programs supported by Rozana and implemented through its partners.

Principle 3. Upholding the rights of the child

Rozana believes that all children have the right to developmental growth in accordance with the 'United Nations Declaration on the Rights of the Child.' It is committed to upholding the rights of the child under this convention. In all actions concerning children, the best interests of the child shall be a primary consideration. This will include ensuring that when working directly with children, Rozana Program Managers and partners will provide opportunities for children's views to be heard and then incorporate these views into projects and policies (e.g., child-led committees, child-friendly feedback forms, small group discussions).

Principle 4. Sharing responsibility for child Safeguarding

Rozana is committed to effectively managing risks to children, and requires the commitment, support and cooperation of partner organisations and individuals who help to deliver our programs. Rozana expects that all allegations will be taken seriously and investigated by our partners, whilst respecting all parties and maintaining confidentiality throughout the process.

Principle 5. Procedural Fairness & Confidentiality

Rozana will apply procedural fairness when making decisions that affect a person's rights or interests. Rozana's partners are expected to adhere to this principle when responding to concerns or allegations of child exploitation and abuse and all allegations will be handled with confidentiality (as opposed to secrecy).

8. RISK BASED APPROACH

Rozana takes a risk management approach to Child Safeguarding. In order to provide safe activities, programs and environments for children, a Child Safeguarding risk assessment will be undertaken for all activities that involve children, either directly, or indirectly. Processes for monitoring and evaluating risk and child safeguarding processes, will be factored into all project cycles including design, appraisal monitoring and evaluation (refer to Rozana's Project Management Policy).

Rozana requires medium or high-risk projects (see section 5.) to:

- I. Conduct an initial child safeguarding risk assessment;
- II. Implement ongoing risk management strategies including regular policy and procedure reviews; and
- III. Complete additional child safeguarding training (where needed) to ensure child safeguarding principles inform project design and implementation.

9. RESPONSIBILITIES

9.1 Rozana Management

- Rozana professional staff are responsible for promoting children's rights and for championing the Safeguarding of children. Management is responsible for implementation of these policies.
- Rozana Child Safeguarding Policies and Procedures will comply with the Code of Conduct in relation to child Safeguarding (set out below). Particular responsibilities include building child Safeguarding awareness, rigorous recruitment and screening practices, education and training including a yearly refresher course for all Representatives in an ongoing relationship with Rozana, responding to complaints and allegations, systems and administration.
- Professional staff are responsible for promoting child safe messages in their work including appropriate child-safe communications on websites, brochures, recruitment materials and publications including fundraising materials. Management has particular responsibility to support and develop systems that maintain this environment.
- Management is responsible for ensuring that all Representatives entering into relationships with Rozana have read, understood and consented to compliance with this Child Safeguarding Policy by signing a consent form (Annexure A).
- Rozana is responsible for providing a version of this Child Safeguarding Policy translated into Hebrew and Arabic to its program partners and commits to running Child Safeguarding Training with program partners who are not already implementing their own Child Safeguarding Policy.

9.2 All Representatives

- All Representatives are obliged to create and maintain an environment which prevents exploitation and all forms of abuse and exploitation of children and promotes positive staff conduct.

- All Representatives are responsible for having a thorough knowledge of these policies and procedures, acting in accordance with them and complying with the staff Code of Conduct.
- Where a Representative develops concerns or suspicions regarding any type of child abuse and exploitation by a fellow worker, whether in the same organisation or not, s/he must report such concerns via the prescribed Rozana reporting mechanisms by the end of the day, or the following day if the reported incident happens after hours. Failure to report concerns or a suspicion regarding any type of child abuse and exploitation will be considered a breach of Rozana's Child Safeguarding Policy.

Rozana will ensure that partner program recipients declare their adherence to the processes and protocols as outlined in this policy and will:

- Take seriously any reports of harm a child has disclosed to them;
- Investigate and act on all child Safeguarding matters or allegations without harming the involved child;
- Take immediate action on the matter or allegation;
- Ensure that the best interests of the child are upheld;
- Whenever appropriate and applicable, cooperate with parents and other professionals in protecting a child from harm.

10. CHILD SAFEGUARDING AND RISK MANAGEMENT PROCEDURES

10.1 Child Safeguarding Practices

- Rozana Representatives will be expected to exemplify appropriate conduct while maintaining safety and effectiveness when working with children.
- Rozana will provide Child Safeguarding training to all staff, volunteers and Board Directors.
- Rozana Israel will undertake a Child Protection Risk Context Analysis for all new implementing partners using the process outlined in Appendix D.
- Rozana will evaluate the implementation of this policy in respect to its program partners on an annual basis and will report back to the International Board on this evaluation, together with any recommendations for improving the implementation of Child Safeguarding Policy practices and procedures with its project partners.
- Rozana makes Child Safeguarding risk assessment, monitoring and evaluation mandatory for all new projects.

10.2 The Responsible Use of Stories and Images of Children

Rozana is committed to ensuring the privacy and safeguarding of children when collecting and using their images and personal information for promotion, fundraising, and development education. Detailed guidelines on Taking and Using Visual Images and Personal Information of Children are outlined in the Child Safeguarding Code of Conduct (see Appendix A).

When collecting stories or images of children, Rozana Representatives must adhere to standards outlined in this Child Safeguarding Policy to ensure children are portrayed in a respectful, appropriate and consensual manner at all times. This means that when collecting children's stories and images, Rozana Representatives must:

- Ensure that local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child;
- Obtain informed consent from the child's parent/guardian/caretaker of the child in all circumstances, and the child where appropriate and possible, before photographing, filming a child or using their personal information. At a minimum, informed consent means explaining to the parent/guardian/caretaker and child the implication, purpose and potential uses of the photograph, film or personal information. This consent should be documented using the Rozana Consent Form which can be found in the Rozana Communications Policy
- Ensure that children are represented in a dignified and respectful manner (i.e., adequately clothed and depicted in a manner which is not vulnerable, submissive or sexually suggestive) in all photographs, films and videos;
- Ensure that images of children are honest and factual representations of the context in which they were taken;
- Ensure that file labels, meta data or text descriptions do not reveal identifying information about a child (such as a child's name) when sending images electronically or publishing images in any form; and
- Obtain Rozana consent before storing, transferring or using any images for evaluation, education, promotional and/or fundraising purposes.
- Sign a copy of the Rozana Child Safeguarding Policy & Child Safeguarding Code of Conduct (see Appendix B) to confirm they have read and will abide by Rozana's stated policies and procedures when working with children.

10.3 Recruitment and Screening

| Minimum Expectations: Rozana Staff, Volunteers & Local Partner Organisations | Low | Medium | High |
|--|-----|--------|------|
| • Min 3 verbal reference checks | ✓ | ✓ | ✓ |
| • Sign the Safeguarding Code of Conduct | ✓ | ✓ | ✓ |
| • Complete relevant training or attend an equivalent in-person briefing | ✓ | ✓ | ✓ |
| • Have a working with children check completed within the last five years | | ✓ | ✓ |
| • Behaviour based interview questions | | ✓ | ✓ |

10.4 Partners

1. Rozana will ensure due diligence and capacity assessments include a Child Protection Risk Context Assessment of local partners with regard to Safeguarding including policy implementation and risk management to prevent harm.
2. Rozana requires that local partners carefully screen all potential staff and volunteers who may come in contact with children or are working with children (see definitions). The screening process is comprised of the following standards and procedures:
 - I. All potential staff and volunteers who work in medium to high-risk roles must have completed a working with children check and/or documentation giving approval for direct work with children in accordance with Israeli or Palestinian legal requirements.
 - II. All potential volunteers and staff are to supply a minimum of three references which must be verbally checked to ensure that there is no known history of child abuse or improper conduct in relation to children.
 - III. Any candidate for a role that requires working with children or contact with children (see definitions) must be given behaviour-based interview questions.
3. All local partners must have policy(ies) in place to safeguard children and adults equivalent to this Policy and should implement steps equivalent to I. and II. for their employees and volunteers. Where Partners do not have their own robust equivalent Safeguarding Policy(ies) in place, Rozana will consider the level of assessed risk in 9.3.1 and seek to build the capacity of the Partner to work towards that position including encouraging and supporting them to comply with this Policy
4. In the case of: Government Partners and Strategic Partners such as hospitals — Rozana will actively and regularly seek to educate Government and Strategic Partners on the benefits of safeguarding policies and processes by:
 - I. Understanding the local policy frameworks;
 - II. Identifying risks and gaps;
 - III. Working with Government and Strategic Partners to mitigate risk by addressing those gaps; and where possible documenting the engagement.

11. REPORTING

11.1 What Should be Reported

- I. ANY INCIDENT, BELIEF OR SUSPICION OF ABUSE OR EXPLOITATION from a child, community member, or Rozana Representative, including:
 - Reports, allegations, observations or concerns that a child has been abused, exploited, is being groomed or is at risk of significant harm.
 - Reports pertaining to the possession of child exploitation material.
 - Becoming aware that a Rozana stakeholder or staff member/volunteer of an Rozana funded program has been accused of, charged with, arrested for, or convicted of criminal offences relating to child abuse or exploitation
- II. NON-COMPLIANCE WITH THE SAFEGUARDING POLICY OR FAILURE TO SAFEGUARD CHILDREN Including any activities or practices that:
 - Do not protect the best interests of the child (fail to implement reasonable child safeguards); or
 - Do not meet applicable local laws or standards.

11.2 Who Should Report

All Rozana Representatives, community members and associates nominated in the scoping section of this policy.

11.3 When to Report

Child abuse concerns should be raised immediately.

11.4 Who to Report To

| | |
|--|--|
| CONTACT DETAILS Israel: Rozana Safeguarding Officer (which is the COO) who can be contacted using a secure and confidential incident reporting platform: https://whistleblowersoftware.com/secure/RozanaReporting or by calling +972-547401725 or writing to: The Safeguarding Officer PO Box 20142 Tel Aviv 612101 | |
|--|--|

11.5 Reporting Procedure

1. In the case where a child discloses abuse by an adult, another child, or any other person, staff must:
 - a) Listen to the child and observe the child's demeanour and behaviour closely.
 - b) Demonstrate sincere interest and appropriate concern in the information relayed by the child.
 - c) Avoid questioning or investigating the child inappropriately or prompting the

child's answers.

- d) Tell the child that you need to notify a trustworthy and relevant staff member who can help the child.
- e) Immediately notify the designated Safeguarding Officer (the COO) who must record all details of the matter in a Critical Incident Report Form (Appendix A). If for any reason, the Safeguarding Officer is not available, the incident must be reported to the CEO or the most senior member of management available at that time. The report must be clear and accurate, detailing and recording the date, time, conversation, relevant observations, who was involved in the incident, how the incident occurred, and if the child has told their parents or anyone else, and what they told these individuals. The staff member who wrote the report must certify the report with their name, signature and date.
- f) Whenever relevant and possible, collect any additional information regarding the matter, such as photos of lacerations or statements from any witnesses.
- g) Staff must protect the child immediately and ensure that the same incident will not happen again, always considering the best interests of the child while investigating the matter or allegation. Staff must explain to the child the importance of reporting abuse and the process for notifying relevant officers about the abuse.

NB: All Child Safeguarding Incident notification forms must be emailed to DFAT's Conduct and Ethics Unit on childwelfare@dfat.gov.au

- 2. Any Rozana Representatives that become aware of or suspects harm to a child or adult within the activities of Rozana, our local partners or otherwise while at work, or any other breach of the Child Safeguarding Policy must immediately notify the Child Safeguarding Officer (the COO). This can be done using our confidential third party platform <https://whistleblowersoftware.com/secure/RozanaReporting> and selecting the Child Safeguarding Officer as the recipient of the report. Alternatively, the Child Safeguarding Officer can be contacted directly on [+972-547401725].
- 3. If the accused is a staff member or volunteer:
 - a) They must be suspended from their job or from volunteer service temporarily pending the results of an investigation. The accused will not be considered a perpetrator unless and until they have been proven guilty.
 - b) If the accused is found to be innocent of the allegations, they will be able to recommence work again. However, in circumstances where abuse or misconduct by a staff member or volunteer is proven beyond a reasonable doubt, the staff member will be terminated immediately (or in the case of a volunteer, immediately dismissed).
 - c) If an investigation is being conducted into the actions of a staff member, that person must be given a written notice of the reasons for their suspension from duties and will be advised of the result of the investigation as soon as it becomes available. During the course of the investigation, the staff member is not permitted to consult with other staff or children.
 - d) In the event that an allegation made against a staff member or volunteer is proven to be untrue, appropriate steps must be taken to follow up with the person who made the accusation, and disciplinary action may be taken if the person knowingly made a false report. If a child has made a false complaint, the seriousness of the matter must

be discussed with the child, and counselling should be provided to the child and/or staff member/volunteer who was falsely accused.

4. Confidentiality is a key principle of reporting and managing child Safeguarding concerns. All information regarding a child Safeguarding concern must only be shared with the designated Manager or Safeguarding Officer. The names of people involved, and the details of the report will remain confidential. Information will only be released on a “need to know” basis or when required by Australian or overseas law or when a report to police or child Safeguarding authorities is made. The Safeguarding Officer or reporting staff member is required to:
 - a) Send a copy of the initial report to the Rozana COO who is Rozana’s designated Safeguarding Officer. The Safeguarding Officer must in turn notify the International Board and provide them with a copy of the report. All parties are bound by the rules of confidentiality.
 - b) Seek professional assistance in certain circumstances from an external organisation. In that case, the committee will need to report confidential information to that organisation.
 - c) In the event that the matter is of a criminal nature, the partner program organisation will assess the situation and progress through all necessary steps as directed by law, a lawyer or a relevant organisation.
 - d) Deal with all allegations in accordance with the Child Safeguarding legislation within each program nation, Israel or Palestine. Compliance with Child Safeguarding legislation may include reporting any allegations to the relevant authorities. Each program recipient is expected to become familiarise with the mandatory reporting requirements for its country.
 - e) Submit a final written report of the investigation detailing the findings and the actions taken. A copy of the report shall be filed with the program partner and with Rozana Israel.

11.6 Disciplinary Action

Disciplinary action will be taken against any staff or volunteers or associate found to:

- Have failed to report a Child Safeguarding concern;
- Have intentionally made a false allegation;
- Be guilty of serious misconduct (see 11.7) as a result of a serious breach of the Child Safeguarding Policy (minor breaches may result in action such as refresher training or increased supervision).

Disciplinary action may include the following sanctions:

- Rozana staff, Board Members or volunteers — disciplinary action such as suspension, transfer to other duties or dismissal;
- Other Rozana Representatives — up to and including termination of all relations including contractual and partnership agreements with Rozana;

Where relevant — reporting to authorities.

11.7 Serious Misconduct

Immediate termination will result if staff or volunteers are found beyond reasonable doubt to have committed any of the offences listed below.

1. Any form of sexual assault, including but not limited to indecent assault, non-consensual sexual activity, aggravated sexual assault and attempted sexual assault;
2. Possession/dissemination/production of child pornography or child abuse material;
3. Inappropriate personal communication (including emails, telephone calls, text messaging, social media and web forums) that explores sexual feelings or intimate personal feelings with a child;
4. Grooming or procuring children for any sexual activity or trafficking;
5. Physical assault (including threatening a child, their family, or others).

12. DOCUMENT CONTROL INFORMATION

| Date | Version | Revised Description | Reviewed / Updated by |
|----------------|---------|---|-----------------------|
| 2021 | V1 | Created | Board of Directors |
| April 2021 | V2 | Removed “unless under the law applicable to the child, majority is attained earlier.” from definition of “child” p4 | Board of Directors |
| August 2021 | V3 | Review of the policy in line with ACFID requirements | Board of Directors |
| September 2023 | V4 | <ul style="list-style-type: none"> • Notification of breaches to the new email: https://whistleblowersoftware.com/secure/RozanaReporting • Change in person notified. • Added wording in the Agreement: I understand that breaching the code may result in disciplinary action, including dismissal. • Changing ‘Child Safeguarding Officer’ to ‘Safeguarding Officer’ | Board of Directors |
| March 2024 | V4 | P14. added reminder that All Child Safeguarding Incident notification forms must be emailed to DFAT’s Conduct and Ethics Unit | CEO |

APPENDIX A: ROZANA CHILD SAFEGUARDING CODE OF CONDUCT AGREEMENT



ROZANA CHILD SAFEGUARDING CODE OF CONDUCT AGREEMENT

The following behavioural protocols outline what is necessary when interacting with children. It is therefore imperative that all Rozana Representatives abide by the following protocols to ensure the Safeguarding and safety of children and sign the agreement below.

General Protocols

1. Staff and volunteers must immediately report any concerns of child abuse or breach of the Child Safeguarding Policy or this Code of Conduct according to the guidelines outlined in the Child Safeguarding Policy.
2. Touching body parts or areas normally covered by underwear is not allowed. The only exception to this rule is for medical treatment by a medical professional. Children must be accompanied by an appropriate adult.
3. If a child demonstrates negative body language, such as recoiling, pulling away, becoming stiff, dropping arms down their sides, or avoiding eye contact when being touched, regardless of intent, body contact must be discontinued immediately.
4. Children are never to be encouraged or forced to touch another person against their will.
5. Any form of behaviour that humiliates, degrades, or exploits a child or compromises a child's wellbeing is prohibited including but not limited to the exchange of money, employment, and/or goods or services for personal gain including sexual favours.
6. Adults will always be responsible for their behaviour and cannot blame the child for their actions, even if the child provokes or acts in a seemingly seductive manner.
7. When interacting with children, staff and volunteers must communicate appropriately through their language, tone of voice, attitude, actions, body language and facial expressions and must not use language or behaviour towards children that is inappropriate or sexually provocative or that is intended to shame, humiliate, belittle or degrade children or otherwise perpetrate any form of emotional abuse.
8. Staff and volunteers must never physically assault or abuse children or use physical discipline to guide children's behaviour.
9. Staff and volunteers are not to initiate, respond to, or encourage any inappropriate or culturally insensitive physical, emotional or social contact with children in the care of the recipient partner program.

10. Staff and volunteers must not provide or administer any medication to the children unless stipulated in their job description. Staff and volunteers are not to give or provide children with alcohol or illegal drugs.
11. Staff and volunteers are not to show favouritism through the provision of personal gifts except where these gifts are given with the knowledge and approval of the child's parent or guardian
12. Staff and volunteers must never hire children for domestic or other labour.
13. Staff and volunteers must, wherever possible, ensure that another adult is present when working with or near children.
14. Staff and volunteers should not use any kind of digital media, such as computer, mobile phone, video camera, or digital camera to record the child's picture in an inappropriate way. The staff member must not seek to benefit from the photo or dishonour the child.

When photographing or filming a child or using children's images for work-related or fundraising purposes:

1. Take care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child.
2. Obtain informed consent from the child and parent or guardian of the child before photographing or filming a child. An explanation of how the photograph or film will be used must be provided.
3. 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.
4. Ensure images are honest representations of the context and the facts.
5. 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.

APPENDIX B: CRITICAL INCIDENT FORM



CHILD SAFEGUARDING CRITICAL INCIDENT FORM

A critical incident is defined as “any actual or alleged event/ situation that creates a significant risk of substantial or serious harm to the physical/ mental health, safety, or well-being of an individual”.

Please note that this is to be filled out by the staff member(s) who were witness to/ or involved in the incident.

Please fill Critical Incident Report form out within 24 hours. This can also be done online at <https://whistleblowersoftware.com/secure/RozanaReporting>

Staff First & Last Name: _____

Job Position: _____

E-mail: _____

Date of Incident: ____/____/____

Description of Incident: _____

(please continue on separate page and attach to completed document if more space is required)

Program Name: _____

Location: _____

Names of Children Involved:

Child 1. (First name/Last name): _____

Child 2. (First name/Last name): _____

(please continue on separate page if more than 2 children are involved and attach to completed document)

Names of Staff/adults allegedly involved:

Adult 1. (First name/Last name): _____

This person is an *(please tick)*: Employed staff member ☐; Volunteer ☐; Other:

Adult 2. (First name/Last name): _____

This person is a *(please tick)*:

Employed staff member ☐ ; Volunteer ☐; Other: _____

(please continue on separate page if more than 2 adults are involved and attach to completed document)

Police Notification:

(please tick appropriate box):

☐ None; ☐ Police notified, complaint filed; ☐ Police notified, no complaint filed

Current safety of child: _____

Was a medical examination undertaken? Yes/No If yes: Name of medical practitioner:

Contact details of medical practitioner: _____

Date of examination (please attach report): _____/_____/_____

What actions were taken or needed? _____

(please continue on separate page and attach to completed document if more space is required)

What follow up actions are required? _____

Staff Signature and Date:

Supervisor's Signature and Date

_____/_____/_____

_____/_____/_____

All Child Safeguarding Incident notification forms must be emailed to DFAT's Conduct and Ethics Unit on childwelfare@dfat.gov.au.

CHILD SAFEGUARDING CODE OF CONDUCT AGREEMENT

I (full name)_____ have read and understood all regulations and operations stipulated in the Rozana Child Safeguarding Policy and Child Safeguarding Code of Conduct and I agree in the course of my association with Rozana to comply with the Policy and Code of Conduct. I understand that breaching the code may result in disciplinary action, including dismissal.

Representative’s signature:

Date:___/_____/_____

Witness’s signature:

Name

Position

Date:___/_____/_____

APPENDIX C: CHILD PROTECTION RISK CONTEXT ASSESSMENT TEMPLATE



Child Protection Risk Context Assessment Template

Taken from the DFAT Child Protection Guidance Note: Establishing Risk Context

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

| | | |
|--|---|--|
| <p>Step 1: Part A – What is the level of ‘working with’ or ‘contact with’ children at the activity level? Complete the worksheet by adding a Yes or No response.</p> | | |
| <p>1. Contact with Children - Assessment (No = nil contact)</p> | | |
| Inherent risk | Personnel will be deployed internationally (outside their usual country of residence)? | |
| | Personnel will be working in a remote and/or rural location? | |
| Degree of Isolation | Involves being alone with children? (not frequently enough to be working with children) | |
| | Involves activities that are away from organisation location | |
| | Involves meeting one-on-one with children? (not frequently enough to be working with children) | |
| | Involves unpredictable or remote settings? | |
| Online contact or access to personal details | Involves direct one-on-one or group access to children online? | |
| | Involves supervising child-to-child online contact? | |
| | Involves online access to a child’s or children’s personal and/or confidential information? | |
| | Inadequate/missing safe options for children to report unwanted attention or inappropriate behaviour by others? | |
| | Involves educating children and supporting adults on cyber safety? | |
| <p>2. Working with Children - Assessment</p> | | |
| Vulnerability of child/children | Engages with children whose true or cognitive age impacts on their ability to protect themselves? | |
| | Engages with children who have challenges that contribute to their vulnerability? (e.g. psychological, situational) | |
| | Engages with children who do not have many support systems? | |

| Working with Children – Assessment (continued) | | |
|--|---|--|
| Degree of physical contact | Involves demonstrating a skill to children? | |
| | Position involves need for physical contact/touching children? | |
| | Involves providing a personal service? (e.g. washing, dressing, toileting) | |
| Degree of monopoly | Monopoly on provision of goods and/or services <ul style="list-style-type: none"> • Medical? • Food distribution? • Career training (sports/musical)? | |
| Degree of supervision | Involves personnel having unsupervised contact with children? | |
| | Activities/engagement with children is not observed or monitored? | |
| | Insufficient number of trained staff to supervise activities/engagement with children? | |
| Degree of trust | Involves developing close, personal, long term relationships with children? | |
| | Involves transporting children? | |
| | Involves one or more of the following: One-on-one supervision, overnight supervision, out of town activities, advising or offering guidance to children or spending extended periods of time with children e.g. camps? | |
| | Contributes to important decisions regarding the future of children? | |
| Access to Property | Has access to personal/confidential information? | |
| | Adult has a perceived or actual level of authority? (from child perspective) | |
| Skills and knowledge required | Requires specific skills, knowledge, qualifications or service eligibility requirements to undertake a child related position? | |
| Child labour | Possibility that activity will lead to the employment of children? | |
| | Possibility that activity will lead to the removal of children from school? | |
| | Possibility that activity will lead to children being employed in hazardous work? | |
| Vulnerability of parent/carer | Engages with parents whose true or cognitive age impacts on their ability to protect their children? | |
| | Engages with parents who have challenges that contribute to their ability to provide care? (e.g. psychological, situational) | |
| | Engages with parents who do not have many support systems? | |

| | | |
|-----------------------------------|--|--|
| Vulnerability can include: | Physical and mental disabilities, homelessness, child sex workers or parents who are sex workers, children and families impacted by disasters, displaced, migrants, refugees and asylum seekers, children in contact with the law, children that have been subject to trafficking, orphans, unaccompanied minors and the very young? | |
|-----------------------------------|--|--|

Step 1: Part B – Assess the Activity Risk

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

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

Note: If the activity is determined to be 'working with children' then an assessment of child protection risk is required and the manager must apply the standards described in Rozana's Child Safeguarding Policy which are based on DFAT's nine minimum child protection standards.

An individual contractor engaged in a 'working with children' activity is not required to have a child protection policy. However, they are required to have a current criminal history check, to sign the Rozana code of conduct and provide evidence of their commitment to child protection. This would include an assessment of child protection risks and attending child protection training.

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

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

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

Focus - A child-focused organisation is an organisation that answers 'yes' to any of the questions below¹.

| | | |
|----------------------------|---|--|
| Types of activities | Does the organisation across all of its operations provide any direct activities/services for children? | |
| | Does the organisation provide any humanitarian relief? | |

¹ A yes would indicate that an organisation would need to apply and build on the minimum child protection standards set out in Rozana's Child Protection Policy

| | | |
|---|---|--|
| Business model/services provided by organisation | Organisation provides Residential/Orphanage/Shelter services? | |
| | Organisation uses a child sponsorship model? | |
| | Organisation allows sponsors to visit with children? | |
| | Organisation is part of a 'voluntourism' ² program? | |
| | Organisation requires technical experience/expertise to implement child related services? | |
| | Organisation uses children and/or images of children as a 'product' for fundraising activities? | |

Note: If an organisation is 'child-focused' then an assessment of child protection risk is required and the organisation must apply or build on the child protection standards detailed in Rozana's Child Protection Policy. This is regardless of whether the level of contact with children is 'working', 'contact' or 'nil'. This is due to the increased risk of child abuse and exploitation within a child-focused organisation.

Step 2: Part A (Continued)

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

| | | |
|---|---|--|
| Child protection policy and procedures³ | Child Protection Policy in place that includes a commitment to preventing a person from working with children if they pose an unacceptable risk to children? | |
| | Risk management practices in place and include risks to children | |
| | Recruitment practices, screening completed for all staff, before commencing work? | |
| | Notifications/Incident reporting procedures in place? | |
| | Staff and downstream partners receive child protection training? | |
| | Boundaries for appropriate behaviour/code of conduct are implemented? | |
| | The organisation's employment contracts contain provisions for suspension or transfer to other duties of any employee who is under investigation and provisions to dismiss any employee after an investigation? | |
| | Record keeping procedures are in place (meetings, activities, incidents, reports, logs, record of complaints, staff performance)? | |
| | The organisation ensures their downstream partners (organisations or individuals) comply with the relevant minimum child protection standards? | |

² Voluntourism is "Volunteer travel, volunteer vacations or voluntourism is travel which includes volunteering for a charitable cause" Voluntourism is a business model that has been shown to be very high risk to children.

³ A no response to all or most questions would indicate a high-risk organisation due to poor systems. A yes response to all or most questions would indicate strong systems

| Step 2: Part B – Organisational Risk | | | |
|---|------------------------|--------------------------|---|
| Organisational risk is the level of potential risk posed by the organisation due to their ability to address child protection risks through their policies, procedures and systems and the type of work the organisation engages in (e.g. if they are a child focussed organisation, their risks will be higher). | | | |
| LOW | NO FOCUS | <input type="checkbox"/> | Organisation is not a child-focused organisation (you answered No to all questions in Step 1 – Focus) |
| MODERATE | FOCUS & STRONG SYSTEMS | <input type="checkbox"/> | Organisation is a child-focused organisation and has good child protection systems in place (You answered Yes to any question in Step 1 Focus and had a majority of Yes answers to the questions under systems and controls) |
| HIGH | FOCUS & POOR SYSTEMS | <input type="checkbox"/> | Organisation is a child-focused organisation and has poor or nil child protection systems in place (You answered Yes to any question in Step 1 Focus and had a majority of No answers to the questions under systems and controls) |

Step 3: Establish the overall child protection risk context

Establish the overall child protection risk context to determine whether an assessment of child protection risk and the application of the minimum child protection standards are required.

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

| Organisation level of contact with children and systems in place (organisation inherent risk from Step 2) | Activity Level of Contact with Children (activity inherent risk from Step 1) | | |
|--|--|--|---|
| | NIL (LOW) | CONTACT (MODERATE) | WORKING (HIGH/VERY HIGH) |
| NO FOCUS (LOW) | <input type="checkbox"/> No further assessment required | <input type="checkbox"/> Assessment of child protection risk required Apply the appropriate minimum child protection standards to manage the risk | <input type="checkbox"/> Assessment of child protection risk required Apply and build on all nine DFAT minimum child protection standards Consider the need for technical expertise |
| FOCUS & STRONG SYSTEMS (MODERATE) | <input type="checkbox"/> Assessment of child protection risk required. Apply all nine DFAT minimum child protection standards | <input type="checkbox"/> Assessment of child protection risk required Apply the appropriate minimum child protection standards to manage the risk | <input type="checkbox"/> Assessment of child protection risk required Apply and build on all nine DFAT minimum child protection standards |

| | | | |
|--|---|--|---|
| FOCUS & POOR SYSTEMS (HIGH/VERY HIGH) | <input type="checkbox"/> Assessment of child protection risk required. Apply and build on all nine DFAT minimum child protection standards | <input type="checkbox"/> Assessment of child protection risk required Apply and build on all nine DFAT minimum child protection standards | <input type="checkbox"/> Assessment of child protection risk required Apply and build on all nine DFAT minimum child protection standards Consider the need for technical expertise |
|--|---|--|---|

| | | | |
|----------|---------------|-----------|----------------|
| Low Risk | Moderate Risk | High Risk | Very High Risk |
|----------|---------------|-----------|----------------|

If the matrix indicates an assessment of child protection risk is required

- Conduct an assessment of the child protection risks within the organisation and activity using the risk management processes outlined in Rozana's Risk Management Policy. A child protection risk assessment requires us to assess all possible child protection risks within the activity.⁴
- Show evidence to DFAT that the assessment has been completed and documented.
- For high or very high risk contexts, consider whether you should get someone with child protection expertise to assist with the risk assessment and policy and procedure development.

If the matrix indicates a requirement to apply the appropriate minimum child protection standards to manage the risk

- The minimum child protection standards put in place will depend on the risks identified in the risk assessment. DFAT would expect at a minimum that implementing partners:
 - Undertake a risk assessment
 - Have appropriate recruitment and screening practices in place
 - Have clear reporting procedures and a requirement to immediately report any suspected or alleged instances of child abuse, exploitation, harm or child protection policy non-compliance with Rozana's Child Safeguarding Policy and the DFAT Conduct and Ethics Unit via childwelfare@dfat.gov.au
 - Training for personnel in child protection awareness and their obligations to protect children and report concerns

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

⁴ See DFAT's Child Protection Guidance Notes for guidance on risks and mitigation measures within certain sectors <http://dfat.gov.au/childprotection> or contact the Child Protection Compliance Section on child.protection@dfat.gov.au.