

Safeguarding and Prevention of Sexual Exploitation, Abuse and Harassment Policy - SAFE-1

Scope

1. This Policy outlines WorldShare's stance on Safeguarding for all people, including children and vulnerable people who interact or affected by WorldShare activities or WorldShare funded projects.

Purpose

2. The purpose of this policy is to:
 - a. Protect people that interact with, or are affected by, WorldShare.
 - b. Support a positive and effective internal culture towards safeguarding.
 - c. Define the key terms we use when talking about protecting people or safeguarding.
 - d. Set out the way WorldShare manages safeguarding risks.
 - e. Set out the specific roles and responsibilities of persons working in and with WorldShare.
 - f. Facilitate the safe management of incidents.

Policy Statement

3. All people, regardless of their age, gender, race, religious beliefs, disability, sexual orientation, or family or social background, have equal rights to protection from exploitation, abuse and harassment.
4. Sexual exploitation, abuse and harassment goes against the beliefs, values and mission of WorldShare. WorldShare employees, volunteers, consultants, representatives and partner organisations are prohibited in engaging in this conduct. WorldShare has zero tolerance for sexual abuse, neglect or exploitation.
5. WorldShare seeks to serve the outcast and forgotten. The vulnerability inherent in these groups of people increases the risk of abuse of power differences and increases the opportunity for exploitation, abuse and harassment.
6. WorldShare commits to promoting and protecting the welfare and human rights of people that interact with, or are affected by, our work - particularly those that may be at risk of exploitation, abuse and harassment. We have no tolerance for exploitation, abuse and harassment.
7. All staff, volunteers, partners and third parties of WorldShare share responsibility for protecting everyone from exploitation, abuse and harassment. Beyond this, particular people have specific responsibilities, and they must carry out their duties without exception.
8. WorldShare has a process for managing incidents that must be followed when one arises. Any concerns or suspicions regarding violations of this policy or the WorldShare Safeguarding and PSEAH Code of Conduct must be reported using the reporting process. Reporting of concerns or suspicions is mandatory.



9. Training on this policy is delivered to staff at induction, and as part of WorldShare's regular staff training program.
10. Sexual activity with children (persons under the age of 18) is prohibited regardless of the local age of consent.
11. No WorldShare representative can enter into sexual relationships with beneficiaries, in recognition that there is an unavoidable power imbalance between WS representatives and community members.

Definitions

12. 'Safeguarding' means protecting the welfare and human rights of people that interact with, or are affected by, WorldShare. Safeguarding refers to any responsibility or measure undertaken to protect a person from harm while they are in direct contact with WorldShare or a WorldShare funded project.
13. 'Vulnerable people' refers to who are at greater risk of exploitation, abuse and harassment. This includes individuals who may not be able to care for themselves or unable to protect themselves, such as people with a disability, illness or trauma or elderly people.
14. 'Children' refers to people under the age of 18 years
15. 'Young people' refers to people aged 18 to 25 years old
16. 'Abuse, harassment or exploitation' means all forms of physical, sexual and mental abuse, exploitation, coercion or ill-treatment. This might include, for example:
 - a. Sexual harassment - sexually related behaviour that is unwelcomed, unsolicited and unreciprocated and would cause a reasonable person in the circumstances to be offended, humiliated or intimidated. It does not refer to occasional compliments or other mutually acceptable behaviour;
 - b. Sexual exploitation - any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, threatening or profiting monetarily, socially or politically from the sexual exploitation of another;
 - c. Sexual abuse - the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions, including exposure to pornography;
 - d. Harassment - systematic and/or continued unwanted actions towards a person or group that could include threats and demands;
 - e. Emotional / psychological abuse - a sustained pattern of verbal abuse or harassment that results in damage to the victim's self-esteem or social competence. It can take the form of rejecting, threatening, ridiculing, ignoring, intimidating or isolating the person;
 - f. Neglect - the deliberate or careless failure by a parent or care-giver to provide a child with basic needs such as clean water, food, shelter, medical care, sanitation or supervision or care to the extent that the child's health and development are placed at risk;
 - g. Bullying - repeated verbal, physical or social behaviour that intends to cause physical, social or psychological harm, often through the misuse of power;
 - h. Sexual criminal offences;
 - i. Threats of, or actual violence, verbal, emotional, spiritual or social abuse;



- j. Cultural or identity abuse, such as racial, sexual or gender-based discrimination or hate crime;
 - k. Coercion and exploitation – persuading someone to do something by use of force, threats and/or abuse of power.
 - l. Abuse of power – a misuse of power by someone who is in a position of authority or is able to make decisions about who accesses benefits from a project to induce someone in an inferior or dependant position to commit a wrongful act
17. A 'survivor-centric approach' means considering and lawfully prioritising the needs, right and wishes of survivors.

Managing safeguarding risk

18. The way WorldShare manages the risks of safeguarding will be:
- a. Holistic. WorldShare and its stakeholders will work to prevent, detect and take action on incidents.
 - b. Risk-based and proportionate. WorldShare will regularly assess the risks to people in its operations and develop proportionate controls to mitigate those risks.
 - c. Survivor-centric. WorldShare will put survivors at the heart of its approach to safeguarding.
 - d. Lawful. WorldShare will ensure that it understands and complies with the law in everything it does, in all jurisdictions in which it works.
19. WorldShare will not knowingly engage in partnerships with any individual or organisation that pose an unacceptable risk to vulnerable adults or that do not meet WorldShare's Safeguarding and PSEAH policies. It is a requirement that any individuals or partner organisations engaged by WorldShare report concerns, suspicions or allegations of SEAH by WorldShare representatives, implementing partner organisation or within WorldShare funded activities.

Roles and responsibilities

20. While the responsibility to protect people is shared by all who work at or with WorldShare, some individuals have specific obligations with which they must comply.
21. The members of the board of WorldShare are responsible for:
- a. Protecting all people that interact with, or are affected by, WorldShare;
 - b. Ensuring that there are appropriate and effective ways for WorldShare to do this;
 - c. Ensuring that WorldShare observes all relevant laws relating to safeguarding;
 - d. Ensuring that WorldShare takes a survivor-centric approach.
22. The Chair of the WorldShare Board must:
- a. Follow up and investigate Safeguarding incidents and reports of violation of the Safeguarding and PSEAH Policy and Code of Conduct and liaise with the relevant authorities where the CEO is unable to do so or is involved in the incident.
23. The Chief Executive Officer of WorldShare must:
- a. Ensure WorldShare has effective and appropriate ways to manage safeguarding and legal compliance;



- b. Ensure the appointment of a Safeguarding Officer with appropriate skills and competencies;
- c. Ensure that reasonable steps are taken to protect people;
- d. Follow up and investigate Safeguarding incidents and reports of violation of the Safeguarding and PSEAH Policy and Code of Conduct and liaise with the relevant authorities and where relevant the partner CEO;
- e. Ensure that reports to external parties are made where required.
- f. Report any suspicions or concerns or violations of this policy or the Safeguarding and PSEAH Code of Conduct to the WorldShare board within 24 hours of being notified of the incident.

24. The Safeguarding Officer of WorldShare, the Head of International Partnerships, must:

- a. Manage reports of exploitation, abuse and harassment;
- b. Report all suspicions or concerns of violation of this policy or the Safeguarding and PSEAH Code of Conduct to the WorldShare CEO within 24 hours of being notified of the incident;
- c. Ensure that all staff, contractors, and volunteers are aware of relevant laws, policies and procedures, and WorldShare's Code of Conduct;
- d. Ensure all staff members have signed the Safeguarding Code of Conduct and completed a police back ground check and child protection check
- e. Carry out training for all staff members on Safeguarding
- f. Ensure that overseas ministry partners have a localised version of this policy and an adequate complaints handling system;
- g. Provide training to overseas partners in Safeguarding and PSEAH
- h. Ensure that all staff, contractors and volunteers are aware of their obligations to report suspected incidents of exploitation, abuse and harassment;
- i. Manage reports of exploitation, abuse and harassment;
- j. Ensure Safeguarding policies and procedures are reviewed and up to date;
- k. Provide support for staff, contractors and volunteers in undertaking their responsibilities.

25. All Managers of WorldShare must:

- a. Promote a positive culture towards safeguarding;
- b. Implement this policy in their area of responsibility;
- c. Ensure that the risks of incidents have been considered in their area of responsibility;
- d. Ensure that there are appropriate controls in place to prevent, detect and respond to incidents;
- e. Facilitate the reporting of any suspected exploitation, abuse and harassment;
- f. Take a survivor-centric approach to potential incidents and ensure that any incident is dealt with transparently and accountably.

26. All Staff, Volunteers and contractors of WorldShare must:

- a. Read the Safeguarding and PSEAH Policy, sign the Safeguarding Code of Conduct attend a Safeguarding training session



- b. Comply with all requirements of the Safeguarding Policy and Code of Conduct;
- c. Report any concerns or suspicions they have regarding possible violations of this policy or of the Safeguarding and PSEAH Code of Conduct to the appropriate authority. Reporting of violations of this policy or the Safeguarding and PSEAH Code of Conduct is mandatory
- d. Report any suspicion that a person's safety or welfare may be at risk to the appropriate authority; and
- e. Provide an environment that is supportive of everyone's emotional and physical safety.

27. All partners of WorldShare must:

- a. Implement the provisions of this policy and WorldShare's procedures in their dealings with WorldShare;
- b. Have a Safeguarding Policy and Code of Conduct
- c. Have a Safeguarding Officer within the organisation
- d. Include Safeguarding considerations in their recruitment processes
- e. Have clear complaints processes which are communicated and accessible to project beneficiaries
- f. Report any suspicion that an incident may have taken place, is taking place, or could take place.
- g. Take part in WorldShare Safeguarding and PSEAH training
- h. Immediately notify WS CEO if anyone working, volunteering or visiting WorldShare funded activities are accused/suspected of, charged with, arrested for or convicted of criminal offences related to sexual exploitation, abuse or harassment. If allegations relate to the WorldShare CEO then the partner must notify the board chair of WorldShare.

28. WorldShare Safeguarding and PSEAH Procedures apply.

29. WorldShare Requirements for Partner Organisations apply.

Recruitment and training

30. WorldShare is committed to safe recruitment and screening practices. These practices aim to recruit the safest and most suitable people to work in our programs.

31. All job advertisements will contain a statement that WorldShare is committed to Safeguarding and all applicants will be required to undergo background checks.

32. Applicants will be required to submit a detailed application form when applying for a position. This form will ask for extensive information about the applicant's background such as dates and places of employment, education and other activities. Referees will be required for shortlisted candidates.

33. Behavioural-based questions will be used to ask examples of the candidate's past behaviour and experiences.

34. For all positions that involve potential contact with children, behaviour questions will be included in the interview, exploring the candidate's motivation for working with children.

35. All staff members must read the:

- a. WorldShare Safeguarding and PSEAH Policy
- b. WorldShare Safeguarding and PSEAH Code of Conduct

36. All staff members must provide:
 - a. A Working with Children Check
 - b. Police Background Check
 - c. Signed WorldShare Code of Conduct.
37. WorldShare reserves the right to refuse employment to or terminate any person's employment that may pose a risk to other WorldShare staff members, partner staff, people in WorldShare funded projects, vulnerable people or children.
38. All WorldShare staff along with relevant volunteers and representatives will take part in Safeguarding training as part of their orientation. Refresher training will then be conducted annually.
39. WorldShare's Safeguarding and PSEAH Procedures applies.

Managing safeguarding risks to children

40. WorldShare recognises that there are number of potential risks to children in the support of overseas partners. WorldShare works proactively with our partners to assess these risks to children in WorldShare-supported programs to reduce the risk of harm.
41. WorldShare's Safeguarding Requirements for Partners applies

Child Safeguarding in Sponsorship Programs

42. WorldShare recognises the need to implement specific guidelines to manage child safeguarding risks within its sponsorship programs. Failure to adhere to these sponsorship guidelines may result in WorldShare terminating the sponsorship, requiring the child to be removed from enrolment of the child sponsorship program and reporting the matter to the police.
43. WorldShare encourages communication, through letter writing and sponsor visits, between sponsors and children as it facilitates stronger connections between overseas communities and WorldShare supporters. All letters and visits are vetted by WorldShare to ensure child and sponsor protection.
44. WorldShare recognises the need to implement specific guidelines to manage the child abuse risks within its sponsorship programs. Failure to adhere to these sponsorship guidelines may result in WorldShare terminating the sponsorship, requiring the child to be removed from enrolment of the child sponsorship program and reporting the matter to the police.
45. WorldShare encourages communication, through letter writing and sponsor visits, between sponsors and children as it facilitates stronger connections between overseas communities and WorldShare supporters. All letters and visits are vetted by WorldShare to ensure child and sponsor protection.

Initiating sponsorship

46. All sponsors will receive clear child protection and behavioural guidelines upfront when initiating sponsorship. They will also be informed about procedures for corresponding with and visiting sponsored children.

47. All correspondence between sponsors and children will be reviewed by WorldShare staff for appropriate content, cultural sensitivity and to ensure the confidentiality of the child's and sponsor's addresses. Address and contact information must never be shared between sponsors and children.
48. With greater access to new technologies, it is possible for sponsors and sponsored children (or their families) to establish contact over the internet, for example through social networking or email. Direct contact between sponsors and sponsored children (or their family members) is not permitted by WorldShare. All communications must go through WorldShare.

Visits

49. All visits are arranged in advance through WorldShare. No sponsors may visit their sponsored children unless the visit has been arranged through WorldShare, in order to minimise the risk of harm to sponsored children, their families and communities, and overseas partner organisations. Sponsors must contact WorldShare at least three months prior to the anticipated departure from Australia.
50. WorldShare will then provide the sponsor with detailed information about visiting his or her sponsor child or children, and may put the sponsor in direct contact with the overseas partner organisation which manages the sponsorship program. The sponsor and any accompanying family members or travel companions will be required to complete relevant forms, including the Child Protection Code of Conduct and a Working with Children check. The signed Code of Conduct and Working with Children Clearance (both no more than 12 months old) must be provided to WorldShare before WorldShare can approve the visit. Sponsors will be interviewed by WorldShare before each visit and will be taken through Safeguarding training.
51. During visits, sponsors are to follow the Child Protection Code of Conduct. They are not to invite the children away from their communities, including to visit Australia, or to exchange contact details. WorldShare encourages its overseas partner organisation that maintain a child sponsorship program and receive a sponsor visit to:
 52. At all times during the visit accompany the sponsor.
 53. To conduct meetings in public places and not the child's home, in order to ensure that the child's actual place of residence is kept confidential at all times.
 54. During the visit, immediately report any inappropriate or suspicious behaviour by the sponsor toward any child to the Safeguarding Officer of WorldShare.

Privacy and data protection for children

55. WorldShare will undertake all reasonable precautions to protect paper and electronic information about children, particularly sponsored children.
56. Information about sponsored children is kept in a secure location and child information is restricted to WorldShare individuals who require access to the information as part of their work responsibilities.
57. No photographic, electronic or printed material containing images or information relating to children that could put a child at risk of identification are made available through any form of communication media unless necessary and provided that there are strict guidelines concerning their use.



58. All images of children that are used in promotional or awareness materials are never accompanied by explicit information regarding the child's place of residence. Any text accompanying an image (including file labels) that in any way identifies the child will be pixilated or removed.
59. Sponsors are not to publicly share photos or stories of their sponsored children (or other children involved with WorldShare partner organisations).

Safeguarding for Short Term Teams

60. WorldShare recognises the need to implement specific guidelines to manage the safeguarding risks within its Short Term Team trips to overseas partner organisations. Failure to adhere to these guidelines may result in WorldShare terminating a person's involvement in the short term team trip, and if applicable reporting the matter to the police.
61. All short term team members will undergo an application process before WorldShare approves participation in a trip. Safeguarding questions will be included as part of the application process.
62. All visits to programs overseas, without exception, will be arranged through WorldShare. Unauthorised visits are when a supporter of WorldShare visits a community directly or arrives at the overseas office of an organisation funded by WorldShare, requesting access to ministry partners or beneficiaries without the required approvals obtained from WorldShare. In this event, the WorldShare-funded organisation will be expected to manage the person according to the guidelines outlined in this Child Protection Policy and WorldShare's Safeguarding Policy.

Orientation and Training

63. All short-term team members must read the:
 - a. WorldShare Safeguarding and PSEAH Policy
 - b. WorldShare Safeguarding and PSEAH Code of Conduct
 - c. WorldShare Safeguarding and PSEAH Procedure
64. All short-term members must provide:
 - a. A Working with Children Check
 - b. Police Background Check
 - c. Signed WorldShare Safeguarding and PSEAH Code of Conduct
65. All short-term team members must complete a Safeguarding training session conducted by the WorldShare Safeguarding Officer before they will be allowed to depart for the trip.

During trips

66. During trips to overseas partner organisations, short term team members are to follow the Child Protection Code of Conduct. They are not to invite the children away from their communities, including to visit Australia, or to exchange contact details.
67. Short term team members are to follow the direction of the short term team leader in respect to interaction with children.
68. During the visit, short term team members are to immediately report any inappropriate or suspicious behaviour to the short term team leader, or to the head of the overseas partner organisation if the report involves conduct of the short term team leader. Short term team



leaders will then immediately notify the head of the overseas partner organisation and the WorldShare Safeguarding Officer

Correspondence

69. With greater access to new technologies, it is possible for short term team members and children (or their families) to establish contact over the internet, for example through social networking or email. Direct contact between the short term team member and children (or their families) from the partner organisation communities is not permitted by WorldShare. All communications must go through WorldShare.

Managing Safeguarding Incidents

70. Abuse, harassment and exploitation are all serious misconduct and WorldShare reserves the right to:

- a. Take disciplinary action against those it believes are responsible, which may include suspension, warning and dismissal;
 - b. Take civil legal action;
 - c. Report the matter to law enforcement.
71. Throughout the reporting and investigation process, WorldShare will take a survivor centred approach, prioritising the rights, needs and wishes of the survivor, including treating them with dignity and respect, providing them with comprehensive information and involving them in decision making. As such, no action will be taken which may put the survivor at risk of further harm or which contravenes their wishes. Follow through support for the survivor will also be provided following the investigation.
 72. A staff member or WorldShare representative who is an alleged perpetrator may be stood down while an investigation takes place. Staff members who have been stood down will receive full pay and are entitled to a just process that does not pre-suppose guilt or innocence. Professional counselling services may be made available to staff involved in an investigation.
 73. By default all alleged incidents with a criminal aspect will be reported to the appropriate local law enforcement agencies. If there is a legitimate reason not to do so in regards to survivor well-being, this will be documented within the investigation report. In this case, all possible measures will be taken by WorldShare and the partner organisation to prevent future occurrences.

Reporting suspected incidents

74. All staff, volunteers and third parties must, as soon as practicable, report any suspicion that an incident has taken place, may be taking place, or could take place.
75. They may do this through I reporting to:
 - a. The Safeguarding Officer, safeguardingofficer@worldshare.org.au; or
 - b. The Chief Executive Officer, ceo@worldshare.org.au; and if this person is involved in the incident or in the opinion of the complaint-maker has not dealt with the incident satisfactorily, then:
 - c. The Board Chair chair@worldshare.org.au;



- d. Any member of the Board.
- 76. If a person believes that another person is at risk of immediate harm or the victim of a criminal offence, they must dial 000 or the relevant in country emergency number if not in Australia. Any person making such a report should NOT:
 - a. Notify the person to whom the claim or allegations relate
 - b. Seek to independently investigate or substantiate the claim
- 77. The WorldShare CEO must report any Safeguarding or PSEAH incidents or concerns to the board within 24 hours of being made aware of the incident.
- 78. *Responding to suspected incidents*
- 79. All suspected, perceived, potential or actual incidents will be managed through development of a response and recording in the Incident Register.

External reporting

- 80. WorldShare will:
 - a. Report any suspicion of a criminal offence to the police or the relevant criminal judicial body;
 - b. Meet all donor requirements regarding the reporting of incidents;
 - c. Report any qualifying matter to the ACNC.
- 81. WorldShare's Safeguarding Procedures Apply

Privacy and data protection

- 82. All personal information considered or recorded will respect the privacy of the individuals involved unless there is a risk to someone's safety. WorldShare will protect personal information.
- 83. WorldShare's Privacy Policy applies.

Marketing and communications materials

- 84. WorldShare will ensure that people including children who come into contact with WorldShare are respected through the way they are portrayed in WorldShare communications materials
- 85. WorldShare Fundraising and Communications Policy applies.

Monitoring and Review of Policy

- 86. The Board is responsible for monitoring and reviewing this policy regularly.
- 87. Where compliance issues are identified, the Board will work with staff, the CEO and other relevant stakeholders to promptly address these issues.
- 88. Any updates and revisions to this policy must be endorsed by the Board.

Board approval date	29 April 2021		
Scheduled review date	April 2024		
Revision date	Version	Summary of Changes	Person making changes
4 September 2020	1.2020	Creation of policy	JM, CEO
29 April 2021	1.2021	Board approval	Board