

# Australian Volunteers

Child Protection Policy Workbook



## Table of Contents

Introduction to this workbook .....	2
1. Why is child protection important?.....	3
What is a Child Protection Policy? .....	3
What are the benefits of having a Child Protection Policy? .....	3
2. Guidance on developing a Child Protection Policy .....	4
Child protection minimum standards:.....	4
2.1 Child-safe recruitment .....	4
2.2 Incident reporting.....	4
2.3 Child protection training .....	5
2.4 Code of Conduct .....	5
2.5 Policy reviews .....	5
2.6 Child-focused risk assessments .....	5
2.7 Other tips to strengthen your Child Protection Policy .....	6
3. Child Protection Policy template .....	7
3.1 Policy layout.....	7
3.1.1 Title page .....	7
3.1.2 Introduction.....	7
3.1.3 Principles, values and beliefs.....	7
3.1.4 Policy scope .....	7
3.1.5 Definitions.....	7
3.1.6 References to national or international laws/policies.....	8
3.2 Policy procedures .....	8
3.2.1 Recruitment procedures:.....	8
3.2.2 Not employing anyone who poses an unacceptable risk to children .....	8
3.2.3 Employee contracts (child protection clause) .....	8
3.2.4 Child protection training.....	8
3.2.5 Child Protection Code of Conduct.....	9
3.2.6 Incident reporting and response procedures.....	10
3.2.7 Child protection risk assessments.....	10
3.2.8 Child Protection Policy review .....	10
Appendix 1: How to develop and implement an incident reporting process.....	11
Appendix 2: How to develop a child-focused risk assessment.....	14
Appendix 3: Taking and publishing images of children.....	17
Appendix 4: Monitoring and reviewing your Child Protection Policy .....	20

## Introduction to this workbook

The Australian Volunteers program has a strong commitment to protecting children from all forms of harm, exploitation and abuse, and supporting children's rights.

To support our commitment, we have a set of minimum child protection standards that we ask organisations to meet before hosting an Australian volunteer. These standards reflect the principles and commitments contained in the United Nations Convention on the Rights of the Child (UNCRC), and those outlined in the Department of Foreign Affairs and Trade's (DFAT) Child Protection Policy.<sup>1</sup> Collectively, these requirements help create and maintain protective environments for children during the delivery of the Australian aid program.

We have put this workbook together to support program partners in their development, implementation and review of child protection policies. The workbook is designed to walk you through the benefits and rationale for a Child Protection Policy, and provide clear, practical tips on policy development. It is our aim that through this workbook, we can assist partners to develop a policy that is their own – one that suits their needs, addresses their organisational risks and references their own programs and legislative environments.

### **This workbook is divided into the following sections:**

1. An exploration of why child protection is important
2. What is a Child Protection Policy?
3. Benefits of a Child Protection Policy
4. Outline of child protection partnership requirements and policy standards
5. Template for developing a Child Protection Policy
6. Appendices (guidance notes):
  - How to develop an incident reporting process
  - Establishing risk management procedures that safeguard children
  - Take and publish images of children in a safe, respectful manner, and;
  - Child Protection Policy - monitoring and review form

***“It's important to review our child protection policy, implementing the policy...  
I'm the voice of the children and I have to protect them”***

Child Protection Workshop attendee,  
Johannesburg, South Africa, March 2019.



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<sup>1</sup> The DFAT policy can be downloaded here: <http://aid.dfat.gov.au/aidissues/childprotection/Pages/home.aspx>

## 1. Why is child protection important?

Children don't always have a voice, and globally, many children are vulnerable and at risk of being harmed or exploited. Globally, millions of children endure violence and exploitation every year, including through forced labour and physical, sexual and emotional abuse. Children with disabilities are particularly vulnerable.

Children easily trust. People in positions of authority can take advantage of their position (whether a parent, teacher, religious leader, member of the police force or community member) and harm children. It is never easy for a child to stand up and say 'don't hurt me'.

Children have a right to be protected from harm by organisations. The protection of children is a fundamental human right – enshrined in the United Nations Convention on the Rights of the Child, which all countries worldwide have signed.

Child protection is also an essential component of responsible, constructive development practice. We cannot contribute to a better future for all if we're simultaneously damaging the generation that will inherit the communities, organisations and cultures we operate within. In this sense, child protection is as much a right and responsibility, as it is an investment in a sustainable future.

### What is a Child Protection Policy?

A Child Protection Policy is a statement that clearly explains what an organisation will do to help ensure that children are safe from harm, exploitation and abuse. It is also a set of rules or regulations for personnel, volunteers and other workers, and an opportunity to express a commitment to ensure that children have a right to be protected, supported and free from violence and abuse.

### What are the benefits of having a Child Protection Policy?

Even if your organisation does not work directly with children, there are some important benefits of a Child Protection Policy:

- The need to protect children is an issue for all communities in all countries. Children are one of the most vulnerable groups of people in the world.
- A Child Protection Policy will strengthen your organisation's reputation and build good governance.
- A Child Protection Policy sends a clear message that child abuse is not acceptable, anywhere. Even if your organisation doesn't work with children, staff represent your organisation and can interact with children in the community at any time. If a staff member is convicted of a serious offence against children, this could seriously damage your organisation's reputation and profile.
- A Child Protection Policy helps ensure that staff and volunteers understand risks to children and are aware of what best practice is when in contact with children or using their images.
- A Child Protection Policy shows potential donors and stakeholders that your organisation is committed to taking a well-considered, risk-mitigating approach to your activities.

As one partner organisation shared during a Child Protection Policy workshop:

***"Children are our future... we need to protect them by all means that we can."***

## 2. Guidance on developing a Child Protection Policy

Before writing your Child Protection Policy, consider the following steps:

- ✓ Engage in a discussion within your organisation about the needs and benefits of having a Child Protection Policy.
- ✓ Review any existing policies or practices for use as a basis for your own Child Protection Policy. Are any of the standards and practices already operating in your organisation?
- ✓ Decide who will write the policy, and whose responsibility it will be to review the policy in the future.
- ✓ Review the minimum and other best practice standards as outlined below.

### Child protection minimum standards:

Before mobilising a volunteer for one of our non-government partner organisations<sup>2</sup>, we will request a copy of the organisation's Child Protection Policy. In some cases, organisations already have one in place. In other cases, organisations may need assistance with developing their own. The Australian Volunteers Program team in each country will liaise with partner organisations during this process, helping organisations either expand upon or develop their Child Protection Policies so that they can reflect these standards in a way that is relevant to their cultural context and activities.

Below are some explanations about the set of best practice/minimum standards we look for in a partner organisation's Child Protection Policy:

#### 2.1 Child-safe recruitment

Strong recruitment screening processes can help protect and safeguard children at a fundamental level. By subjecting potential employees to this process, organisations can prevent themselves from accidentally employing personnel who may pose an unnecessary risk to children. This is achieved through the early identification of risks and concerns associated with a potential employee, intern, volunteer or any other person that might be acting on behalf of the organisation.

Without screening procedures in place, your organisation may be targeted by people who want to harm children, which may lead to a person who poses a risk to children being accidentally appointed to a position within your organisation.

For a detailed explanation of the recruitment procedures you may consider adopting, refer to sections 3.2.1 and 3.2.2 of our *Child Protection Policy template* below.

#### 2.2 Incident reporting

Your Child Protection Policy should include a reporting and response process for any allegations, observations, concerns or accusations of child abuse. By clearly outlining your organisation's incident reporting procedures, personnel associated with your organisation are well equipped to minimise the risks associated with abuse, and to quickly put in place a response procedure which will ensure the child/children's ongoing safety is upheld.

Without an incident reporting process, personnel (or community members) will be unaware of how to report concerning behaviour. For a detailed explanation of the incident reporting procedures you may consider adopting, refer to section 3.2.6 of our *Child Protection Policy template* below. We also have an extensive *Guidance note on incident reporting* available on page 12.

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<sup>2</sup> Eligible organisations include non-government organisations and privately-owned businesses/companies. Government and inter-government agencies are not obliged to develop a Child Protection Policy compliance, although the program will provide support where possible if government agencies wish to develop a policy.

## 2.3 Child protection training

A Child Protection Policy cannot be effective unless staff, volunteers and others know about how your organisation will work to protect children and are informed about their responsibilities. Training and policy awareness-raising ensures workers are fully aware of their responsibilities to protect children and how to report concerns/allegations of child exploitation and abuse. Without training, workers may not be aware of what behaviours require reporting or may not know how to incorporate child protection practices into their work.

For more on how to train your staff in applying these principles, refer to section 3.2.4 of our template.

## 2.4 Code of Conduct

Your Child Protection Policy should include a list of behaviours that you would expect of your staff. These can include behaviours that are respectful to children, and other behaviours that are unacceptable (or not allowed). This list will ensure staff and volunteers understand what is expected of them in the workplace.

These behaviours are in line with the United Nations Convention on the Rights of the Child and will help ensure your organisation and staff will be safe for children. Including a Code of Conduct can also protect your workers by providing them with guidance on how to avoid situations that may be harmful to children. Not including a code might mean that concerning behaviour from your workers will go unchallenged. All personnel (including volunteers) should sign your Code of Conduct, with a register kept of personnel who have signed the code.

For a detailed list of expected behaviours refer to section 3.2.5 of our template below. We also have a *Guidance note on taking and publishing images of children* available on page 18 (Appendix 3).

## 2.5 Policy reviews

Laws and policies can change over time, and research into child protection is constantly being updated. You should make sure your policy is regularly reviewed - this can help ensure the policy's ongoing relevance to your organisation's ever-expanding programs and activities. Reviews also ensure that updated national policies are included.

We also have a *'Review and monitoring form'* available on page 21 (Appendix 4), which you can utilise.

## 2.6 Child-focused risk assessments

Risk assessments can help organisations identify and reduce some of the dangers associated with their activities. Potential risks can become serious threats to the wellbeing of children and may also affect an organisation's reputation. Undertaking risk assessments shows an organisation's commitment to a careful, sensitive approach to child safety, and can significantly decrease the number of otherwise avoidable incidents occurring.

Some organisations may have more risks for children than others, such as organisations that work with children who have a disability, sport-focused programs, or in after-school programs, where children are in danger of being isolated. Potential risks, if left unmonitored, can become serious threats to the security and wellbeing of children, and can also affect an organisation's reputation. Undertaking a risk assessment shows an organisation's commitment to a careful, sensitive approach to child safety, and can significantly decrease the number of otherwise avoidable incidents occurring.

Risk assessments are a requirement for eligible partner organisations to include in their Child Protection Policies. However, we encourage all organisations to undertake risk reviews as a way of preventing problems or possible harm to children. We also have a *Guidance note on child-focused risk assessments* available on page 15 (Appendix 2), which you could adapt for your own organisation.

## 2.7 Other tips to strengthen your Child Protection Policy

The following global best practices can also help your organisation to protect children and improve governance. While not standards required by the program, they can help strengthen your Child Protection Policy.

- **Include definitions** - such as what abuse, neglect and exploitation are, and what a child is (anyone under the age of 18). Definitions help ensure that staff understand clearly what the risks are. Example definitions can be found in section 3.1.5 of our *Child Protection Policy template*.
- **Including ways to respond to children if they tell you they have been abused** - a list of strategies to help staff understand how to respond to children when they tell you that they have been abused can help strengthen the capacity of your staff to protect children. Examples of how to respond to a disclosure can be found in our *Child Protection Policy template* under the “Strategies for responding to disclosures” dot point.
- **Promoting the policy on your website** - promoting your policy on your website, or via other media, shows that you are serious about your commitment and also highlights your good governance to potential donors.
- **Allowing children to help develop your policy** - by inviting input and feedback from children you can ensure your policy is relevant to the children it seeks to protect. This can also help identify risks and gaps.
- **Policy translation** - translating your Child Protection Policy into the official language/s of your country helps ensure all workers can read and understand your commitments and obligations.
- **Making sure your policy has meaning** - looking at other Child Protection Policies can be good, but it is best to develop a policy that relates to your own organisation and activities. Try to use words that will mean the most and think about specific risks and needs in your organisation. Involving people from different parts of your organisation may help your policy become meaningful.

### 3. Child Protection Policy template

This template has been designed as a framework only – each country, region and organisation exists in a different context. We strongly encourage you to consider your organisational context, and to write your policy in a way that is relevant to your organisation and your activities, needs and risks.

#### 3.1 Policy layout

<b>3.1.1 Title page</b>	Write here the name of your organisation, and the name you have given your Child Protection Policy. Include also the <u>date that the policy was created</u> , and the <u>date when the policy will next be reviewed</u> .
<b>3.1.2 Introduction</b>	Write here a summary of your policy, including its purpose (such as ‘to help safeguard and protect children’), as well as some of its objectives (such as ‘raising awareness around child protection issues, educating staff, and promoting best practice in programs’).
<b>3.1.3 Principles, values and beliefs</b>	Write here your organisation’s values around children and child protection. These may include: <ul style="list-style-type: none"> <li>• Sharing responsibility for safeguarding</li> <li>• Not accepting or tolerating any child abuse</li> <li>• A commitment to upholding child rights, including the right to be protected</li> <li>• A commitment to seeking to do no harm to children through your programs/operations</li> <li>• Supporting children’s participation and inviting their feedback (<i>‘nothing about us without us’</i>)</li> </ul>
<b>3.1.4 Policy scope</b>	Write here <u>who</u> your policy applies to in your organisation – staff/employees, national and international volunteers, board of directors, downstream partners, visitors etc. This will help ensure that those involved in, or supporting, your organisation’s programs are held accountable to the standards in your policy.
<b>3.1.5 Definitions</b>	Write down a list of definitions that are important for your organisation. All workers <sup>3</sup> should have a clear understanding of what, for example, ‘abuse’ means to your organisation. If people do not understand, there is a serious risk that abuse may not be reported. Definitions you may consider include: <ul style="list-style-type: none"> <li>• <b>Child</b> – according to the UN Convention on the Rights of the Child, a child is anyone under the age of 18.</li> <li>• <b>Physical abuse</b> – the use of physical force against a child (including hitting, shaking, punching, kicking, burning and poisoning) that causes harm to a child.</li> <li>• <b>Sexual abuse</b> – use of children for sexual benefit by an adult or older child.</li> <li>• <b>Emotional abuse</b> – verbal or other acts towards children can damage a child’s self-esteem or confidence. Includes online abuse.</li> <li>• <b>Neglect</b> – the failure to provide a child (when they could do so) with the conditions that are culturally accepted as being essential for their development and wellbeing.</li> <li>• <b>Child exploitation</b> – using children for profit, labour, sexual benefit, or for other personal or financial advantage. Includes producing, obtaining or distributing child exploitation material</li> <li>• <b>Child labour</b> – use of children for work, especially work that is hazardous or interrupts a child’s right to education and development.</li> </ul> <p>Can you think of any other definitions that should be included in your policy? They may also be specifically relevant to your programs and activities.</p>

<sup>3</sup> When referring to ‘workers’ in this template, we are referring to employees, consultants, contractors, office volunteers, interns, the board, and anyone else who might be engaged to undertake work for an organisation



<p><b>3.1.6</b> <b>References to national or international laws/policies</b></p>	<p>Write down relevant local, national or international laws. Referencing laws/policies will help workers understand the reasons your organisation has a Child Protection Policy and why you have rules surrounding that. If you're not sure, the International Labour Organisation's Ratifications List<sup>4</sup> is useful. You may also search your country's profile on the Child Rights International Network<sup>5</sup>, or refer to relevant UNICEF publications<sup>6</sup>. Other information to include may be the date your country ratified the United Nations Convention on the Rights of the Child<sup>7</sup>, and your country's legislation around corporal punishment<sup>8</sup>.</p>
<p><b>3.2 Policy procedures</b></p>	
<p><b>3.2.1 Recruitment procedures:</b></p>	
<p>Write here the steps you take to help safeguard children, and your organisation, when recruiting workers.</p> <p>Recruitment screening processes should include <u>criminal record checks</u> <i>before</i> engagement, and at least <u>two verbal referee checks</u>. If criminal record checks are not reliable, you could request a <u>Statutory Declaration</u>, which involves a worker signing a form stating that they have not been charged or convicted of any child related offence. For positions that involve <i>working</i> directly with children, not just contact, we ask for additional screening measures, such as including <u>behavioural-based questions in your employment interviews</u>.</p> <p>Examples of behavioural-based questions include:</p> <ul style="list-style-type: none"> <li>• What motivates you to work with our organisation?</li> <li>• How would you handle children who were not listening to your instructions?</li> <li>• How would you create a child-safe and friendly space for an activity for young children/older children/children with a disability?</li> <li>• What boundaries are important when working with children and young people?</li> <li>• How would you respond if you were concerned about the actions/behaviour of a co-worker?</li> </ul>	
<p><b>3.2.2 Not employing anyone who poses an unacceptable risk to children</b></p>	
<p>It should be clearly stated in your policy that your organisation will <u>not engage anyone for work if they are deemed to pose an unacceptable risk to children</u>. Employing someone who poses an unacceptable risk to children can undermine your organisation's efforts to ensure a child-safe environment. This relates strongly to the recruitment procedures section and may also be incorporated there.</p>	
<p><b>3.2.3 Employee contracts (child protection clause)</b></p>	
<p>Most workers have an employee contract/agreement that they sign before they begin work. Write in the policy your commitment that employee contracts will contain a clause that ensures workers can be suspended, transferred or dismissed from their employment if they are under investigation, or dismissed if they have breached the Child Protection Code of Conduct. Having this statement in employee contracts (and referenced in your policy) makes it clear that your organisation does not support child abuse, and that there are serious consequences if the Code of Conduct is broken. Without this clause, organisations have difficulty removing an employee who has breached the policy. This relates strongly to the recruitment procedures section and may be incorporated there.</p>	
<p><b>3.2.4 Child protection training</b></p>	
<p>Write here how your policy will be shared with workers/volunteers. This can include a policy awareness session as part of staff inductions; special announcements in team meetings; or online/face-to-face training once every year or two years.</p>	

<sup>4</sup> <https://www.ilo.org/dyn/normlex/en/f?p=1000:11001:::NO::>

<sup>5</sup> <https://archive.crin.org/index.html>

<sup>6</sup> <https://www.unicef.org/where-we-work>

<sup>7</sup> [https://tbinternet.ohchr.org/\\_layouts/TreatyBodyExternal/Treaty.aspx?CountryID=160&Lang=EN](https://tbinternet.ohchr.org/_layouts/TreatyBodyExternal/Treaty.aspx?CountryID=160&Lang=EN)

<sup>8</sup> <https://endcorporalpunishment.org/>

Training should include an explanation of your Code of Conduct and how to apply it in your work, your reporting procedures, and some information on who to contact with questions about child protection.

### **3.2.5 Child Protection Code of Conduct**

Write here a list of behaviours/activities that you expect your workers to do, or not to do. This section should include expectations around the use of media that involves children, such as photos and films. This list of workplace behaviours (below) can help you prepare your own Code of Conduct. The actual words below should only be a guide - we encourage you to use your own words so that your Code of Conduct is easy to read and has meaning to you. Please add other expected behaviours that you think are important given your programs, national laws and policies.

These behaviours should not interfere with normal family interactions – outside of work:

- treat all children with respect
- not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate
- not engage children in any form of sexual intercourse or sexual activity, including paying for sexual services
- wherever possible, ensure that another adult is present when working near children
- not invite unaccompanied children into private residences, unless they are at immediate risk of injury or in physical danger
- not sleep close to unsupervised children unless absolutely necessary, in which case the supervisor's permission must be obtained, and ensuring that another adult is present if possible
- never use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material through any medium
- not use physical punishment on children
- not hire children for domestic or other labour: which is inappropriate given their age or developmental stage; which interferes with their time available for education and recreational activities; or which places them at significant risk of injury
- comply with all relevant local legislation, including labour laws in relation to child labour
- immediately report concerns or allegations of child exploitation and abuse and policy non-compliance in accordance with appropriate procedures
- immediately disclose all charges, convictions and other outcomes of an offence that relates to child exploitation and abuse, including those under traditional law, which occurred before or occurs during association with (*your organisation*)
- be aware of behaviour and avoid actions or behaviours that could be perceived by others as child exploitation and abuse

When photographing or filming a child or using children's images:

- take care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child
- 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
- ensure photographs and videos present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive
- ensure images are honest representations of the context and the facts
- ensure file labels, metadata or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.

The Code of Conduct (with reference your policy) should be signed by all workers who are under the scope of the policy.

### 3.2.6 Incident reporting and response procedures

Write here your process for workers to report (to management) any concerns or accusations of child abuse, or any suspected breach of your Child Protection Policy. Include the steps you will take when reviewing allegations or concerns, or investigation processes.

It is important to outline:

- **The requirement to report** – the wording in the policy should indicate that workers **must** report, not should report.
- **What to report** – concerns or allegations of child abuse, exploitation, or any alleged breach of your policy. These can come in many forms – disclosures from children, witnessing abuse, or noticing someone acting in a concerning way.
- **How to report** – an explanation should be given for how reports can be documented and submitted. This may be done through an online portal, in an email, or through filling out and submitting an official incident report form.
- **When to report** – it is important to ensure that workers know how long they have to submit their report. This prevents a worker from, for example, witnessing abuse and waiting a month to report it. A timeline for reporting should be provided. We recommend 24 hours, but this can be contextualised according to an organisation’s resources and capacity to communicate.
- **Who to report to** – it is critical that your child protection policy explains who your reports can be submitted to. There should always be at least two people to whom these reports can be submitted. This can help your organisation avoid cases where, for example, the person who the report goes to is away on vacation and is unable to respond to the notification.
- **Strategies for responding to disclosures** – while not a program minimum standard, for some organisations, especially those working with children/families, including ways for staff to talk with children if they tell you they have been harmed is very important:
  - Try to keep calm and give the child your attention
  - Let the child take his or her time, and allow the child to use his or her own words
  - Reassure the child that it is the right thing to tell you
  - Don’t make promises you can’t keep
  - Let the child know what you will do next
  - Don’t confront the person who has allegedly harmed the child (it can put you and the child in danger)

### 3.2.7 Child protection risk assessments

Write here what steps your organisation will take to review or assess any risks in your programs or activities.

A strong risk assessment process will include:

- Identifying and making a list (also referred to as a risk log) of any risks to children you can identify in your operations or activities; and
- Statements documenting how your organisation seeks to reduce or remove these risks.

### 3.2.8 Child Protection Policy review

Write down how often the policy will be reviewed (timeline), which we recommend being at least once every five years.

## Appendix 1: How to develop and implement an incident reporting process

### What is an incident reporting process?

An incident reporting process is a clear procedure that can be implemented to ensure that allegations, observations, concerns and risks to child safety are quickly reported and effectively managed.

### Why is an incident reporting process important?

Incident reporting is an essential part of the child protection framework of the Australian Volunteers Program. We require eligible partner organisations<sup>9</sup> to implement an incident reporting process to help manage risks to children in the delivery of the Australian Volunteers Program.

Incident reporting offers all organisations significant benefits, including:

- It helps to ensure that your organisation can quickly be alerted to, and effectively respond to, child exploitation, abuse, or harm
- It helps ensure that your staff, volunteers and contractors are held accountable to their behavior and the organisation's values
- It shows your stakeholders and partners that you are committed to the safety of children, and good governance, and;
- It helps ensure that your organisation and staff comply with local and national laws.

Without a strong incident reporting process organisations can be exposed to significant risks. Serious incidents may not be reported on time, or not reported at all, which can place children at further risk of harm. Staff may not comply with your organisational values, and in some cases, organisations may be ineligible for support or funding from local and international stakeholders. Importantly, an incident reporting procedure helps give children a voice.

### How to develop an incident reporting procedure?

The following questions can help guide your thinking as you develop or review reporting procedures:

- **Who must report incidents?**  
Obligations to report incidents should apply to *all* staff<sup>10</sup>, volunteers (including Australian volunteers), board members, contractors, or anyone engaged to undertake work for your organisation. Ensuring that *everybody* abides by this process shows that child protection is a shared responsibility - everyone plays a role.  
  
If your organisation works with children, it is important to ensure that children themselves can also report concerns or incidents.
- **What types of incidents must be reported?**  
Explaining *what* must be reported can assist staff to identify incidents. There are three 'events' that should be included in the process:
  - Staff must report **if they have seen child exploitation or abuse** (as per your definitions) occurring within any of your programs<sup>11</sup>.
  - Staff must report **if they have concerns** that children in your programs have been harmed or at risk of harm.
  - Staff must report **if they suspect that staff have breached your Child Protection Policy, or the Child Protection Code of Conduct.**

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<sup>9</sup> Eligible partners include non-government organisations (national and international), private sector businesses/enterprises, industry and local associations. Government-run entities, international agencies and statutory authorities are exempt from compliance, although the program will offer support and assistance in policy development where appropriate.

<sup>10</sup>For the purpose of this guidance, staff refers to employees, consultants, contractors, volunteers, interns, board members, service providers, or anyone engaged to undertake work for an organisation.

<sup>11</sup> Incidents occurring in the community may also be reportable, for example to police or other authorities.

Staff should not be required to provide evidence of an incident before a report is submitted. Responsibility for investigating reports should be at the management level.

**Note:** it is recommended that staff are alerted to their obligation to report, irrespective of personal, cultural or other considerations. Including 'must' in the reporting process ensures that staff are fully aware of their responsibilities.

- **Who should reports be sent to?**

Nominating a staff member to receive reports assists in two ways. Firstly, confidentiality and privacy are maintained - having a designated person to receive reports ensures confidentiality and may help staff feel more comfortable reporting. Secondly, you can provide targeted training to these nominated staff members to teach them how to sensitively talk with a person who has reported and how to refer the incident to management or authorities. It is recommended that you nominate *at least* two members of staff to receive reports, to ensure reports can be received and responded to if one of your nominated people are unavailable.

**Note:** where alleged criminal activity has occurred, staff may have an obligation to report the matter to the police, before notifying management.

- **How can reports be made?**

It is important to clearly explain *how* staff can report concerns. Reports can be submitted via phone, face-to-face, or email. Written and emailed reports can also be documented on a form, which provides a record of the initial report. Incident report forms can help the person who reports a concern record information accurately, and by guiding them with a set of questions you can ensure they pass on the most important information. You should be aware of how emailed or written reports are stored - information about an incident report should be stored in a secure place or folder.

**Note:** for child-focused organisations, consider speaking to children to ask their advice on how to develop a 'child-friendly' form. These forms can ensure children feel more comfortable reporting.

- **When should reports be made?**

Incident reports should be submitted *immediately*, or not later than 24 hours after the incident. Without a timeline, staff may feel they can wait before submitting a report. Delayed reports can place a child's physical or psychological safety at significant risk.

- **Responding to incidents:**

Receiving these reports is only one part of the process. The second is to respond to these incidents. Below are some key principles and practices you should apply when responding to a report:

- Ensure that the best interests of the child remain prioritised. The safety of children should always be the first consideration.
- Ensure that while an incident is under investigation, an alleged offender is not allowed access to children or to children's data. If an alleged offender's role includes working or contact with children, consider suspension while the investigation is underway.
- Maintain the privacy of the person who reports. If it is found that a person has intentionally made a false report, consider enacting disciplinary procedures.
- Involve local or national support services - there may be agencies available to help children or victims of domestic abuse, such as shelters or other psycho-social support agencies. Also consider providing the details of these services to the child's caregivers.
- Involve local authorities. If the report involves an alleged breach of local/national laws, police or another authority may investigate the report. Under some laws, it may be a requirement to report allegations or incidents to a certain authority.

If a staff member is found guilty of breaching your policies or abusing a child, you may need to remove them from your organisation. Including a clause in your employment contracts can make it easier to remove staff if this happens. We recommend including the following statement in employment contracts: "A staff member maybe suspended or transferred to other duties if they

are under investigation or dismissed if found to have breached the Child Protection Code of Conduct.” For more information, see section 2.3 of our Child Protection Policy template.

- **Should some incidents be given higher priority than others?**

Some organisations classify reports differently. For example, some organisations give incidents ratings such as ‘critical’ (urgent) and ‘non-critical’ (not urgent) depending on the nature of the report. These ratings may also involve different reporting timeframes, which leads to some incidents being followed up immediately while others are delayed. This can present a significant risk, as some reports may initially seem ‘non-critical’ but become serious after an investigation. We recommend that *all* child incident reports are classified as urgent, irrespective of the nature of the report.

### Examples of incident reporting procedures

#### A) A procedural statement:

This is a simple, concise example of a commitment to incident reporting that you could include in your Child Protection Policy:

*“(Organisation)’s staff, contractors, board of directors and volunteers must report any concerns, observations and allegations of child exploitation and abuse or breaches of (Organisation)’s Child Protection Code of Conduct immediately to the Director, Assistant Director, or Head of Human Resources. These reports will be privacy-protected and can be made verbally, or by email using our incident reporting form. Failure to report an observation, concern or breach may lead to the suspension or termination of employment.”*

#### B) A flowchart:

Some organisations prefer to develop a flow-chart, which visually represents the steps that must be taken to report and respond to an incident.



#### C) An incident notification form:

An incident notification form helps a notifier to explain what the incident involves, and how children can be best supported. Here is an example of one you could use.

<b>What was the date(s) and approximate time(s) of the incident(s)?</b>
<b>How and when did you become aware of this incident?</b>
<b>In which of the organisation’s programs/activities did this occur?</b>
<b>Information about the alleged perpetrator/s</b>
<i>Include name, nationality, occupation, approximate age and relationship with the alleged child victim(s).</i>

<b>If relevant, please describe your relationship (if any) with the alleged perpetrator(s)/child victim(s).</b>	
<b>Information about the alleged victim(s), if known/relevant.</b>	
<i>Include name, age, gender of child(ren). Do you think any other children are at risk? If so, describe the nature of the risks.</i>	
<b>Information about the incident(s).</b>	
<i>Please provide as much detail as possible, including where the incident took place and whether there are other witnesses.</i>	
<b>Information about the current situation for the child(ren), if known.</b>	
<i>Include: any current dangers/risks, whether immediate safety needs have been met, whether the child has been removed from risk of further harm, and whether you are aware of any health/psychosocial support being provided. <b>Note:</b> there is no requirement for you to speak with the child to obtain further details – please just include what you know at this point.</i>	
<b>Are you aware of whether any law enforcement or government authorities, the child’s parents/guardians, or anyone else has been informed?</b>	
<i>If yes provide details – name and title of person, contact details, dates etc.</i>	
<b>Name of person completing this form:</b>	
<b>Date of submission:</b>	

## Appendix 2: How to develop a child-focused risk assessment

### What is a child-focused risk assessment?

A child-focused risk assessment is a process organisations can put in place to identify, and reduce or remove risks to children in their programs. By risks, we mean unforeseen circumstances (or ‘surprises’) that *could* occur in a program – such as in a sporting program where there is a risk of children being injured, or in a childcare centre where there is a risk that children may be left alone.

### Why is it important to undertake a child-focused risk assessment?

By identifying these risks to children early, before a program is started, an organisation can put steps in place to control the risks early. For example, in a sporting club, this may involve training children on how to play safely, providing protective gear, and having a first aid kit available. These small steps both reduce the likelihood of an injury (or harm) occurring and help an organisation respond if it does.

In this sense, a child-focused risk assessment is a powerful tool organisations can use to keep children in their programs safe from harm while displaying their strong, child-safe governance.

### How can you undertake one of these risk assessments?

Including your commitment to undertaking a child-focused risk assessment in your policy is quite simple. We have written some examples below in section 4 and have provided templates in section 5. Undertaking the assessment is slightly more complex. To help you with this, we’ve included some key steps below that an organisation can follow:

- **Consider your ‘touch points’** – the first step is to think about where your organisation has contact with children, or children’s data. Do you have any staff members that work with children, or might have contact with them as part of their role? You could also consider members of your IT team – will they have access to any sensitive information about children? Do you have any programs that are designed for children? Consider all of your organisation’s programs, activities and roles and list these touch points.
- **Work with teams to identify risks** – now that you know how your organisation interacts with children, you can begin considering what kinds of risks might exist in these programs. A simple way to do this is to consider the different kinds of child abuse and harm, and to think about how your programs or activities could lead to these happening. Is there a chance a child could be physically

harmed in your programs or activities? Emotionally harmed? Sexually abused? Neglected, groomed or ill-treated?

Some activities can lead to these being more likely, such as programs where children are staying overnight, or in medical centres where physical harm and neglect can occur. Similarly, in physical activities, children are more likely to be injured.

You should also consider other factors, such as the children themselves – are the children you work with particularly vulnerable? Displaced, orphaned, trafficked, disabled and other children may be more likely to be harmed as a result of some activities than others.

- **Consider how you can reduce or remove these risks** – after identifying these risks, you can now begin to consider and document how you will reduce or remove these risks. These are called your ‘controls’ – things you do to control the risk. You may, for example, include extra behaviours in your Code of Conduct to reduce the chance that harm will occur. Similarly, you may choose to train staff to manage these risks, you may develop posters to hang around the office reminding staff of their obligations, or you may choose to modify the way an activity or program is run to ensure that these risks are minimised. How you reduce and remove these risks is up to your organisation.
- **Document your risks and delegate controls** – now that you have identified risks and decided how you will manage them, you should write them down and clearly delegate members of staff to implement these controls. By documenting and delegating in this manner, you can clearly see what the risks are, how you are controlling them, and who oversees that.
- **Review your risk assessment** – risk assessments should be reviewed at least once every five years to ensure they remain up-to-date and relevant to your programs. In addition, any time you develop a new program or activity, you should undertake a new risk assessment for that program or activity. If it has no contact with children, you may not need to do anything. If it does have contact with children though, you can follow these steps again to identify, reduce and remove those risks.

### Examples of a child-focused risk assessment – visitors

To give you an example of how a child-focused risk assessment works, we’ve carried one out below. In this example we are considering the risks associated with allowing visitors into an organisation that works with children.

- **What risks can we identify when visitors are allowed into a child-focused organisation?**
  - Child abusers and other criminals may use this organisation to gain access to children – especially if the children we support are disabled, orphaned, or have other vulnerability-compounding factors.
  - Visitors may act inappropriately or in a way that damages the organisation’s reputation.
  - Children, especially orphaned and displaced children, may form emotional bonds<sup>12</sup> with the visitors which could lead to psychological harm when the visitors leave.
  - In a childcare center or orphanage, allowing visitors such as tourists into the organisation can reinforce damaging stereotypes of children as poor and needy.
  - It can reduce a child’s access to privacy, which is one of their rights (UNCRC, Article 16<sup>13</sup>).
  - It increases their risk of physical, sexual and emotional abuse.
- **What can we do to reduce or remove these risks?**
  - We can ensure visitors are accompanied by our staff at all times, so there is no risk of them being left alone with children.
  - We can train visitors before allowing them into the organisation, to ensure they understand and comply with our Child Protection Policy.
  - We can collect the details of visitors when they arrive, such as their name and phone number, to ensure we have a clear record of who has visited.

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<sup>12</sup> <https://rethinkorphanages.org/orphanage-mission-trips>

<sup>13</sup> <https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>



- We can ensure that any gifts or donations that visitors bring are left at the office or entrance, so that visitors are not handing gifts directly to children.
- We can record these risks and strategies in our risk assessment log, to clearly show our staff that we have considered the risks and managed them effectively.

### How can you develop your own child-focused risk assessment process?

#### Writing your commitment in your Child Protection Policy:

Demonstrating your commitment to undertaking risk assessments in your organisation can be done quite clearly through your Child Protection Policy. A clear, simple statement can be included, such as:

*“(Organisation name) is committed to protecting children in all of its programs and activities. Accordingly, (organisation name) will endeavor to identify any risks to children in its programs and activities, and will seek to reduce and remove identified risks, before commencing with a program or activity. Identified risks and management strategies will be documented in (organisation name)’s Risk Assessment Log.”*

#### Documenting your procedures:

Documenting the results of your risk assessment is essential. This ensures you have a central location describing all of your commitments, and it clearly demonstrates who is responsible for implementing each of your controls (or risk-management strategies). Below is an example of how you can document your child-focused risk assessment procedures:

Risk Assessment Log		
Identified risk	Controls	Delegation
#1		Name:
		Date:
		Status:
#2		Name:
		Date:
		Status:
#3		Name:
		Date:
		Status:
#4		Name:
		Date:
		Status:
#5		Name:
		Date:
		Status:

## Appendix 3: Taking and publishing images of children

The Australian Volunteers Program bases its image-gathering and publishing on ethical standards; assessment of risk to the child; child safety; respect of the child's rights, integrity and dignity, and; obtaining and documenting informed consent from the child's parent/guardian and, if possible, the child themselves.

*The best interests and protection of children must be prioritised over opportunity for promotion, advocacy, personal interest, and distribution of images.*

### What are the risks of taking/sharing children's images?

- Children's rights to protection, privacy and dignity are infringed, and their vulnerability increased due to being pictured in undignified ways.
- Images published on social media are misused or used in the production and distribution of child exploitation material.
- Children are exploited and abused by the person taking the image.
- Children contacted or located by an offender because of disclosure of personal identity and location.
- Children suffer retribution/punishment due to the disclosure of personal identity and location in a photo.

### Risk mitigation strategies

#### Comply with the Child Protection Code of Conduct

Comply with The Australian Volunteers Program's Child Protection Code of Conduct, which includes appropriate use of images. Note: the Child Protection Code of Conduct applies to all program participants, approved accompanying dependents (both in the context of the assignment and community engagement), staff, contractors, and non-government partners of the Australian Volunteers Program.

Organisations and institutions should develop and implement policies and guidelines about the use of images, including information about obtaining informed consent.

Ensure images of children are dignified and respectful.

- **Images of children should show them suitably dressed**, to avoid them being misused or breaching the child's privacy and dignity. Although in some countries and communities it is culturally acceptable for children not to wear many clothes, taking images in this context should always be avoided.
- **Do not use images of children in poses that could be interpreted as sexually suggestive.** Consider how images may be viewed in different cultural contexts.
- **Be culturally sensitive.** Talk to field staff and communities to find out how they would like to be represented, and whether there are any cultural taboos or anything photographers and staff should avoid doing.
- **Never use images of a child who has died, a child in distress, or a child alone and looking vulnerable.**
- **Consider watermarking and copyrighting images** online to deter images from being misused. Some suggested ways to do this are available online<sup>14</sup>.

#### Obtain informed consent

- **Prior to taking an image, obtain informed consent.** *Informed consent is not simply asking a child if they are happy to have their image taken.* It means an individual must understand and acknowledge what they are giving consent for.
  - Explain (preferably in the local language) how images, words or film will be used (where, how, for how long the images will be available for use, whether they will be used on social

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<sup>14</sup> <https://www.photoreview.com.au/tips/editing/protecting-your-images-before-posting-them-online/>

media and internet sites - where the organisation or individual will not be able to control further use and distribution). When speaking with a child, use age-appropriate communication. If you are unable to adequately explain the purpose, don't take the image.

- Allow time for the consent process to make sure that children don't feel pressured to say yes to something they don't want to do. Remember, children may not be always confident to say 'no'.
- **Always gain informed consent from a child's parent or guardian** and obtain the direct consent of the child or young person wherever possible. Ensure written consent forms are in local language.
  - If written consent forms cannot be utilised (or where it is impractical), oral consent can be accepted, however ensure that consent is clearly documented and include this documentation with the photo/image. When posting an image online, make sure you explain in the citation that you've obtained consent – it's good practice and it sets a high standard for others!
  - All consent documentation should be stored in a secure location.
- **Explain and discuss the possible outcomes** of using the images or giving an interview and publishing a story, particularly where there could be a negative impact on a child.
- **If possible, explain that children and parents/guardians can withdraw their consent at any time**, and provide them with a contact to do this. Advise that, because of the permanency of the internet, withdrawal of consent may not always lead to the removal of an image online.
- **Ensure the organisation has a process for removing images from the image library.** We recommend a maximum of five years for keeping images for use. A 12-year-old child may consent to an image being taken, however when the child is older, he/she may not want their image published any longer.
- **Always make sure children have a person of their choice with them** - never be alone with a child.
- **Never accept consent directly from a schoolteacher or principal.**

#### **Tips for taking images of groups of children or for schools and community groups:**

- Take photos of children in groups from a distance, rather than close up images.
- Ask the school or community group to take notes home to the parent/guardian.
- Make a file note of any risk mitigation strategies put into place to reduce risks to children.
- Ensure parents and children are prepared/briefed prior to taking images. This includes: informing them of what will happen; who will be present and where you are from; the purpose of the visit; what they can do if they do not feel comfortable; and that they can stop at any time or say no to anything without any negative impact.
- **Are you taking a picture in a public place with children around?** You're welcome to do this while on assignment, especially in crowds, cultural events or at significant sites that you visit. It is worth noting however that there might be some children in the background. In this case, make sure that the children are not identified or 'posing' for the camera (in either of these cases, consent would be required). Try and take the photo in a way where children's faces are obscured. Alternatively, consider blurring them in post-production.

#### **Conceal identities and locations**

- Showing children in vulnerable situations can make them targets for abuse and exploitation: images of children alone and isolated increase their vulnerability.
- Don't underestimate the reach of the internet. A picture of a child published on an Australian website can be viewed by someone in that child's community overseas. The internet is a huge and unregulated space, and this poses potential risks for the children organisations work for.
- Turn off the geotagging functions on still and video cameras and mobile phones.
- Conceal the identity of vulnerable and at-risk children. Do not show a vulnerable child's face or represent them in any way that may lead to their identification. This may mean changing names and locations or using district or country names instead of village names. Where names and locations

have been changed a disclaimer should be used. For example: *'The names and location have been changed for child protection and privacy purposes.'*

- Don't include identifying information in images/stories about children, including a child's full name, or their name with other personal information (such as village name, school name, street signs or names of family members) which may identify their location. If in the picture, these should be blurred out.
- Do not identify survivors of sexual exploitation, gender-based violence or abuse.
- Don't reveal a child's status as a person living with a serious health condition without written consent.
- **Don't identify a child's engagement in culturally unacceptable activities**, for example, activities that promote child rights, engagement in sex work, or other socially marginalised or criminal activities.

## Images of Children: Flowchart

**1**

**Identify who you plan to take an image of, explain who you are, who you're volunteering for, and ask a little about them. If they are under 18, progress to step 2!**

**Ask permission from the child and their guardian to take the image. Are there any local traditions or beliefs that relate to images and their reproduction? These must be respected. If their guardian is not available, do not proceed!**

**2**

**3 Explain to the child and the guardian how the image will be used - you may need a translator! You need to ensure they understand that they can refuse too. If your explanation cannot be fully understood, do not proceed!**

**3**

**Introduce our Consent for Images Form (if you have one with you). The guardian can then read and sign the form, which you should keep with you as a record. If they verbally consent, make sure you take a note of this. You can now take the photo!**

**4**

**5 Show the image to the child and their guardian. Are they happy with it? You must ensure it represents the child honestly and doesn't reveal identifying information about them.**

**5**

**Publish your image, noting the consent. Congratulations! It can take time, but these steps help keep children safe.**

**6**

This flowchart has been produced for use and distribution with the Australian Volunteers Program. If you have any further questions about Child Protection and Safeguarding, or how to comply with the programs Child Protection requirements, you can contact the team at [childprotection@australianvolunteers.com](mailto:childprotection@australianvolunteers.com).

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## Appendix 4: Monitoring and reviewing your Child Protection Policy

This form is designed to help partner organisations review their progress in implementing their Child Protection Policy. It is an opportunity to go through parts of the policy, share examples of practices, and identify new ideas or future actions. The form can be used as a self-assessment tool or completed with the help of our program staff in your country. We recommend using this form in line with your own policy review timeframe. However, it is also a living document, and can be used at any time. We welcome the opportunity to support you with policy development and review.

**The following is a list of the Australian Volunteers Program’s minimum/best practice standards for a Child Protection Policy. The list provides a reference point to review various parts of your policy.**

<b>Organisation name:</b>	
<b>Date Child Protection Policy was first developed:</b>	
<b>Date of last policy review (reviewed by whom – organisation staff or with support from Australian Volunteers Program staff):</b>	
<b>Actions noted from last review:</b>	

Standards	Guideline points and questions	Please tick Y/N	Comments/examples of this standard being put into practice?	Any future agreed action
<b>1</b> <u>A Child Protection Policy:</u>	Existence of a Child Protection Policy document.			
	Have all staff, volunteers, contractors or others, read and signed the Policy?			
<b>2</b> <u>Child-safe recruitment steps:</u>  For staff, volunteers and others who may have contact with children.  Helps to make sure you don't employ someone who may harm	Staff/volunteer criminal record checks completed with results kept on file.			
	Job interviews that include a child protection question and verbal reference checks.			
	Asking staff to sign a Statutory Declaration to say whether they have			

	children or affect your organisation's profile or image.	been charged with child abuse and exploitation offences in the past.			
		Identify checks completed for all staff?			
3	<b><u>Incident reporting procedures:</u></b> For suspected child abuse or policy breaches.	Is an incident reporting process in place?			
		Can you share any details of how incidents are reported or responded to?			
		Is an <i>incident report form</i> used so staff can record details of the incident reported? Does it need updating?			
4	<b><u>Child protection training and awareness:</u></b>	Can you share any examples of training held in the last one or two years, or awareness raising about your child protection policy? If so, who came to the training, and importantly, did you find it helpful?			
5	<b><u>Child Protection Code of Conduct:</u></b> A list of behaviours expected in your workplace.	Do you have a Code of Conduct that includes: a) Treating children with respect (e.g. without discrimination). b) Ensuring where possible that staff are not alone with children. c) Not bullying or harassing children, or using language/behaviour that is abusive, or not appropriate within your culture. d) Not using physical punishment on children. e) Not involving children in sexual activities.			

	<p>f) Not sleeping close to unsupervised children unless necessary.</p> <p>g) Respect for national (or international) laws.</p> <p>h) Not using computers, phones, cameras or social media to hurt or harass children, and never accessing/sharing child abuse material.</p> <p>i) Reporting alleged child exploitation/abuse or if your Child Protection Policy is not being followed.</p> <p>j) BeING aware of behaviour that could be seen by others as child abuse.</p> <p>k) Disclosing previous charges or convictions relating to child abuse.</p> <p>l) Not employing children for labour which is not suitable for their age and stops their education/development or may injure them.</p> <p>m) Respecting children’s privacy with photos/images and ensuring images and films show children in a respectful way.</p> <p>n) Not inviting unaccompanied children into private residences unless they are at immediate risk of harm or injury.</p> <p>Any there any other rules or behaviours that you think should be included in your next update of the Code of Conduct? What are they?</p>			
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		Do staff sign or volunteers sign your Code of Conduct, with a record of who may have signed? This helps in case any problems arise.			
6	<b><u>Commitment to not allow people to work with children if it's found that they are a risk to children:</u></b>	This statement helps show your commitment to not allow people in your organisation that may be a risk (by harming children) and can be included in your Child Protection Policy, worker contracts etc.			
		Is this statement included in your own policy?			
7	<b><u>Employee contracts:</u></b> Contracts include a statement for dismissal, suspension/transfer if your Code of Conduct is broken.	Do all new workers have a contract or agreement that includes a statement about child protection?			
8	<b><u>Reviewing the Child Protection Policy:</u></b>	Have you reviewed your policy before today?			
		Who is involved in your review? Is it possible to consult with children and young people about your policy (especially if you work with children)?			
9	<b><u>Child protection risk reviews:</u></b>	This helps prevent child abuse by checking whether there are any risks before a problem happens, and then identifying ways to reduce or remove these risks.			
		Can you share examples of any of your activities that you have reviewed or if you			



		have any plans to review activities in the future?			
<b>1</b>	<b>Other Child Protection Policy</b>	Are there any other standards/activities that your organisation has developed (or could develop in the future) to protect children?			
<b>0</b>	<b>ideas or activities:</b>	Examples: having child protection 'focal points' in your organisation; putting your policy on your website (if you have one); referencing national or international laws in your policy; community education etc			
Do you have any other comments or other feedback about your policy?					

Date for next review: \_\_\_\_\_

Reviewed by (Partner Organisation/AVI)	Signed:	Date:
Approved by (Partner Organisation)	Signed:	Date:

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**Cover image:**

Australian volunteer Disability Officer, Nikisha Smith, with colleague Noriekka Lekka, the Disability Coordinator for Office of Social Services in Pohnpei, Federated States of Micronesia.

Informed consent from the child and parent was obtained for the use of this image.

Photographer: Darren James, 2019.



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