



CHILD PROTECTION POLICY

Approved by: Lille Fro Foundation Board

Date: 24 August 2017

1. Background

1.1 The need to protect children from exploitation and abuse

The need to protect children is an issue for all communities. Children across the world are subjected to exploitation and abuse and experience sexual, physical and psychological violation. Many are forced into exploitative work, including commercial sexual exploitation.

There are many factors that increase children's vulnerability to exploitation and abuse, including disability or being orphaned, displaced, homeless or abandoned. During emergency and disaster situations, children are more likely to experience exploitation and abuse as a result of being separated from their parents and other caregivers who would normally protect them from such harm.

Child exploitation and abuse traumatises children and adversely affects their development and well-being. Children who are exploited and abused experience a greater likelihood of long-term consequences, including mental health issues, reduced educational outcomes, drug and alcohol abuse and increased likelihood of coming into contact with the law. At its core, child exploitation and abuse undermines a child's right to grow up safely.

1.2 The need to protect children from exploitation and abuse

There is international recognition that adults who have a formal role in working with or supporting children are in positions of trust and authority. The relationship between an adult and child is not a relationship between equals. Children are dependent on adults to care for and protect them. It is a shared and collective responsibility of all adults to prevent child exploitation and abuse. Lille Fro Foundation Limited (ACN 135 5001 521) ('Lille Fro') recognises that by the nature of its work, it is at risk of being targeted by those wanting to exploit or harm children. Lille Fro has adopted this policy in recognition of its responsibilities as an overseas aid agency, and is committed to working with its partners to prevent and respond to child exploitation and abuse.

Child sex offenders often seek employment or volunteer placements in organisations that work with children in Australia or overseas. They might be attracted to working in developing countries to access vulnerable children and to avoid tougher laws.

Lille Fro considers child abuse unacceptable in all circumstances and is committed to ensuring that all possible and necessary steps are taken to acknowledge the rights and protection of all children with whom we work.

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

2. Child Protection Policy

2.1 Need to protect children from exploitation and abuse

- *The goal of this policy is:* To protect children from exploitation and abuse of all kinds in the delivery of Lille Fro's development programs.
- *The objective of this policy is:* To create and maintain safe and protective environments for children in the delivery of Lille Fro's development programs.

2.2 Scope

Every person who shares in the work of Lille Fro also shares in the responsibility to take every precaution to protect the children and families with whom we have the privilege of working.

This policy applies to:

- Lille Fro's staff, representatives and Board Members (**Lille Fro's Staff**);
- all partners, schools, contractors, agents and local organisations funded or otherwise engaged by Lille Fro, including:
 - agents, contractors, employees and volunteers (**Contractors**);
 - partners and organisations (including Lille Fro's partner schools and hostels) (**Partners**);
 - personnel of Lille Fro-funded Contractors and Partners. This includes (without limitation): all Partner school and hostel personnel and management (whether engaged on a permanent, casual, contractual or volunteer basis) such as: teachers, hostel staff, house wardens, ground and maintenance staff, school management and committee members, pastoral carers (including religious leaders and providers), doctors and medical carers, Contractors and other third parties and visitors (**Personnel**);
- multilateral organisations and bilateral donor partners funded by Lille Fro; and
- supporters of and visitors to Lille Fro's programs in India (including sponsors, donors, volunteers, visitors, media, journalists, photographers and film makers) (**Visitors**).

together referred to as '**Lille Fro Representatives**'.

3. Guiding Principles

The policy is guided by the following principles:

3.1 Zero tolerance of child exploitation and abuse

Lille Fro does not tolerate child exploitation and abuse. Such action attracts criminal, civil and disciplinary sanctions.

Lille Fro works to reduce the risks of child exploitation and abuse associated with delivering aid activities and trains its staff on their obligations.

Lille Fro will not knowingly engage—directly or indirectly—anyone who poses an unacceptable risk to children. Lille Fro will not fund any individual or organisation that does not meet Lille Fro’s child protection compliance standards in their operations and activities.

3.2 Recognition of the best interest of the child

Australia is a signatory to the United Nations Convention on the Rights of the Child, and Lille Fro is committed to upholding the rights and obligations under this convention. Lille Fro recognises that some children, such as those from low-income families, living away from home, children with a disability and children living in areas impacted by disasters, are particularly vulnerable.

3.3 Sharing responsibility for child protection

To effectively manage risks to children, Lille Fro requires the commitment, support and cooperation of all Lille Fro Representatives who must meet the terms of this policy and will be held accountable, through contracts, audits and spot checks, for complying with it.

3.4 Risk management approach

While it is not possible to eliminate all risks of child exploitation and abuse, careful management can reduce the risks to children that may be associated with Lille Fro’s work. These are identified during initial risk assessments and are managed for the duration of Lille Fro’s activity.

3.5 Procedural fairness

Lille Fro uses fair and proper procedures when making decisions that affect a person’s rights or interests. Lille Fro’s Representatives are expected to adhere to this principle when responding to concerns or allegations of child exploitation and abuse.

4. The Policy

Lille Fro’s Child Protection Policy is comprised of and is set out in the following guidelines:

- Child Protection Policy (this document);
- Child Protection Reporting Form - **Schedule 1**;
- Additional Resources - **Schedule 2**;
- Code of Conduct - **Schedule 3 ('Code of Conduct')**;
 - Image Display and Copying Guidelines – **Annexure 1**
 - Child Protection on the Lille Fro website – **Annexure 2**
 - Sponsor Mail Monitoring - **Annexure 3**
 - Privacy and Security Policy – **Annexure 4**

(the 'Policy')

5. Aim of Policy

The aim of this Policy is to provide guidance and direction to all Lille Fro Representatives to ensure:

- The rights of children are protected and enhanced through Lille Fro's programs and projects.
- Lille Fro Representatives understand issues of child protection and are aware of the problem of child abuse and strive to avoid occurrences of child abuse in all circumstances.
- Organisational risks and duty of care are covered through implementing procedures in recruitment and ongoing management designed to safeguard children through good practice.
- There are clear guidelines on reporting suspected child abuse.

6. Implementation

6.1 Responsibilities – Lille Fro

- Lille Fro's Executive Director will have responsibility for child protection compliance and will ensure that all of Lille Fro Staff, Visitors and Board Members undergo an induction into child protection matters.
- Lille Fro's *Little Seeds Co-ordinator* will ensure that Lille Fro's Australian-based Staff obtain Australian National Police Checks (as required) and sign the Code of Conduct (**Schedule 3**).

6.2 Responsibilities – Contractors and Partners

- Lille Fro's Contractors and Partners will each be responsible respectively for complying with this Policy and must ensure that its Personnel undergo an induction into child protection matters and sign the Code of Conduct (**Schedule 3**).
- This Policy (including the Code of Conduct) as amended or updated from time to time, will be deemed to apply to all of Lille Fro's Contractors and Partners together with their respective Personnel irrespective of whether this Policy or the Code of Conduct has been individually signed.

6.3 Implementation and training

All Partners will be made aware of the Policy and Code of Conduct through the provision of in partnership agreements and via correspondence.

All Staff and Personnel induction must include a comprehensive briefing on child protection matters and their obligations under the Policy.

Annual training and awareness programs / refreshers / updates will be run for Lille Fro Staff on the Policy. Training should at all times be culturally appropriate, taking into account different cultural perspectives on child protection.

6.4 Policy review

The Policy may be regularly revised and updated by the Lille Fro from time to time. If substantial changes are made to the current Policy, these must be ratified to the board and notified in writing by Lille Fro to Staff, Contractors and Partners.

- Lille Fro's Representatives are required to keep themselves informed and updated on Lille Fro's current Policy, a copy of which may be requested at any time or viewed on Lille Fro's website www.lillefro.org.
- Documents will be translated into local languages if requested.

7. Reporting Incidents

Lille Fro considers child abuse to be unacceptable in all circumstances. All alleged cases of child abuse must be reported to the appropriate authorities only and allegations must be investigated and acted upon with the highest priority.

7.1 Steps for Reporting

The following steps guide the reporting process:

- All Lille Fro Representatives should be alert to signs that may suggest a child or young person is in need of help and have a duty to inform Lille Fro in accordance with this Policy.
- An allegation of child abuse is a serious issue and it is therefore essential that all parties maintain confidentiality. Sharing of information should only be with appropriate persons or authorities as required.
- Lille Fro's Executive Director and Staff in India will identify any in-country statutory requirements for reporting to government or other bodies (e.g. the police, law enforcement, social services). Issues that breach the local criminal code must be reported.
- If Lille Fro a Lille Fro employee raises a legitimate concern about suspected child abuse which proves to be unfounded on investigation, no action will be taken against the employee. However, any employee who makes false and malicious accusations against another employee will face disciplinary action.
- An alleged perpetrator of child abuse will normally be suspended from their employment or other relationship with Lille Fro during investigation of the allegations. Depending on the nature of the allegations it may be appropriate to engage an external organisation with particular expertise or police to conduct the investigation. These investigations must be procedurally fair and in accordance with local law.

- In deciding the appropriate course of action, subject to local law, proven child abuse will normally result in:
 - In the case of a Lille Fro Staff, summary dismissal
 - In the case of a Contractor termination of their contract
 - In the case of a volunteer, termination of their relationship with Lille Fro
 - In the case of a Board Member, removal from the Board
 - In the case of Personnel of a Lille Fro Partner or Contractor, summary dismissal together with further training and education for all Personnel

7.2 Reporting procedure for alleged incidents

Where an allegation involves a Lille Fro Representative this must be brought immediately to the attention of the Executive Director. If the allegation is against the Executive Director, the incident should be immediately brought to the attention of the Chair of the Lille Fro Board.

Lille Fro will encourage Contractors and Partners to adopt appropriate child protection measures into their work and educate Personnel (including signing the Code of Conduct). Where appropriate, Lille Fro will incorporate a child protection clause into partner agreements and MOUs. If an allegation involves Personnel from a Contractor or Partner organisation, then an appropriate senior manager within that organisation should be informed.

It may also be appropriate to report the allegation to a statutory authority and report the incident to local police. If the child is in immediate danger then the police, social services or other child protection agency should be alerted.

A template reporting form is attached (**Schedule 1**).

8. Recruitment

Lille Fro recognises that appropriate and stringent recruitment procedures can prevent people who may pose a risk to children from gaining employment and thus minimise the risks of child abuse being committed by a Lille Fro Representative.

8.1 Recruitment and Selection Procedures

The following should be reflected in recruitment and selection procedures for all Staff and Personnel for Lille Fro Representatives:

- A clear position description for the role which is properly assessed during selection and includes a requirement for successful candidate to obtain a police check.
- 2 verbal references obtained for all Staff and Personnel, including their most recent employer (or school), to include the reason for leaving. Personal references should be avoided as they may not provide accurate information on either an applicant's capability or background.
- Gaps in employment/education history should be explored at interview.
- Specific questions on child protection asked at interview.
- Confirmation of identity.
- Contracts of employment contain a clause making police checks a condition of employment.

8.2 Police Checks & Working with Children Checks – Lille Fro Staff

All Lille Fro Staff engaged in work activities and likely to encounter children in the course of their work are required to undergo a National Police Check. The cost of obtaining a Police check for potential employees will be met by Lille Fro. However, volunteers will need to cover the cost of the police check themselves.

These checks will be conducted at the commencement of employment, with follow-up checks conducted every 2 years for those working with children. Lille Fro will inform all prospective Staff of this requirement and will never knowingly employ anyone convicted of a child related offence or permit a person to work with children if they pose an unacceptable risk to children. If a potential employee declines to undergo a police check, the offer of employment will be withdrawn.

Where a police check cannot be obtained all reasonable measures, including background and reference checks, will be undertaken to ensure the person does not pose a risk to children.

8.3 Induction

All Lille Fro Staff whose role is likely to involve working with children will receive a copy of the Policy and a briefing on their responsibilities and obligations. Further training will be tailored to individual project requirements.

All Lille Fro's Contractors and Partners must ensure its Personnel read, understand and agree to uphold Lille Fro's Policy and Code of Conduct and undergo Child Protection training if and when required.

9. Information Technology

Technological development has increased the avenues for communication, including with children. Email, instant messaging and social network sites all provide opportunities for inappropriate contact with children to be developed.

Lille Fro has in place guidelines for safe use of the internet and email to minimise online exploitation of children (see **Schedule 3**).

9.1 Publication of Images and Identifying Information

Images of sponsored children should be used by Lille Fro's Representatives subject to the guidelines of the Lille Fro Child Image Display and Copying Guidelines (**Schedule 3, Annexure 1**).

Media, journalists, photographers and film makers engaged by Lille Fro to promote programs or documenting or reporting on Lille Fro's work together with Lille Fro's Staff, and Visitors to its programs in-country must not spend time with, or have access to Lille Fro' children, without supervision. Nor are they permitted to publish any information which may identify any beneficiary of Lille Fro's programs (including publishing a child's name, photo, village or school, teacher or identifying information or details regarding his or her extended community). Lille Fro has the right to vet and such information and require immediate changes in order to ensure this Policy is upheld and complied with in all regards.

While visiting any of Lille Fro's programs, partners or beneficiaries, all Lille Fro Staff and Visitors, agree to adhere to Lille Fro Policy in relation to Child Protection including signing the Lille Fro Code of Conduct and Visit Agreement and if required, to undergo a police check (**Schedule 3**).

10. Risk Assessments and Program Design

10.1 Incorporating child protection strategies into risk management procedures

Where Lille Fro Staff are likely to come into contact with children during any project or activity, this should be included in any risk assessment and appropriate control measures put in place to reduce the risk, particularly by designing the activity to remove unsupervised contact with children.

Consideration should be made to keeping children safe within program or project design. This should extend to the health and safety of children working on Lille Fro projects. As a minimum, all Lille Fro Representatives must comply with national legislation on employing children.

Partnership agreements will advise Lille Fro Partners and Contractors in-country of Lille Fro's obligations under the Policy and be asked to endorse the protection of children in mutual project activities.

10.2 Ensuring risks to children are managed in humanitarian disaster responses

Lille Fro recognises that children living in areas impacted by disasters are particularly vulnerable.

All Lille Fro Representatives implementing Lille Fro humanitarian disaster response activities must comply with the Policy's child protection compliance standards (see section 2.5). Risks to children must always be considered when developing humanitarian disaster response activities.

11. In-Country Visits

Beneficiaries of Lille Fro's Programs have the right to be secure from accidental or intentional abuse or inappropriate contact by Lille Fro Staff and Visitors visiting our programs in-country.

11.1 Unauthorised contact

With greater access to new technologies, it is now possible for Visitors and sponsored children (or their families) to establish contact through social networking/messaging sites or email.

Direct contact between Visitors and a Lille Fro sponsored child (or beneficiary) and Lille Fro's Partners and Personnel is prohibited by Lille Fro. All correspondence between Visitors and sponsored children must go via Lille Fro, without exception. This ensures that Lille Fro can monitor any communications to ensure that both the Visitor and sponsored child, Lille Fro's Partners and beneficiaries are protected from inappropriate content, abuse and any other activities (See **Schedule 3, Annexures 2 & 3** for more details).

Lille Fro does not permit direct contact between a Visitor and sponsored child or beneficiary as it is unable to guarantee the safety of communications for both parties. Lille Fro will take unauthorised contact seriously. The child (family or representative) and Visitor will be asked to cease this communication and Lille Fro may:

- cancel any sponsorship;
- cancel the visit;
- remove the child / family from enrolment.

11.2 In-Country Authorisation

As Lille Fro is a small organisation, with limited staff resources, all Visitors to either a child, community or Lille Fro Partner must be arranged through Lille Fro's Head Office. This minimises the risk of harm and exploitation to sponsored children, their families and communities. No Visitor is allowed to visit a Lille Fro beneficiary or Partner unless the visit has been arranged through Lille Fro's Head office and the appropriate paperwork is completed.

11.3 Supervision of Visits

At all times during a visit to Lille Fro's projects or beneficiaries, the Visitor must be accompanied by a Lille Fro Staff member. Lille Fro Staff must use reasonable endeavours not to leave the child and parent/guardian alone with a Visitor at any time during a visit.

Meetings are to occur in public places such as schools, restaurants, parks, playgrounds, etc and never take place in the child or Visitor's home or hotel.

Lille Fro Staff must use reasonable endeavors to ensure a child's actual place of residence is kept confidential at all times. This is necessary in order to prevent Visitors returning unaccompanied to a child's home after the scheduled visit. During the visit, any inappropriate or suspicious behaviour by the Visitor toward the child or family member is to be reported immediately in accordance with the reporting guidelines and the Executive Director must be notified.

Based on the report received, the sponsorship or visit may be terminated and the Executive Director will determine whether the incident(s) should be reported to the police. The report as well as any further correspondence relating to the incident is to be documented and filed in a secure filing cabinet.

11.4 Child Visits to the Visitor's Residence

Visits by the child to the Visitors country or residence are STRICTLY PROHIBITED. Not only does this present an enormous risk of abuse, but also the child may be negatively impacted by the culture and material wealth of an environment outside their own experience.

12. Code of Conduct

All Lille Fro Staff and others engaged in activities in work and likely to come into contact with children in the course of this work in Australia and other countries are required to sign the Lille Fro Child Protection Code of Conduct (**Schedule 3**).

Lille Fro's Child Protection Code of Conduct sets stringent standards for personal behaviour. Lille Fro expects Staff to use common sense and avoid actions or behaviours that could be construed as child exploitation and abuse in the course of their association with Lille Fro.

All Visitors to Lille Fro's projects in-country are required to sign the Lille Fro Child Protection Code of Conduct.

13. Further information

Lille Fro Child Protection Compliance Section
Email: teamfro@lillefro.org
Telephone: +61 3 9005 6552
Mail: Child Protection Compliance Section
Lille Fro Foundation
PO Box 603 Avalon Beach
NSW 2107 Australia

14. Our website

Supporting documents to this policy and useful links are available at <http://www.lillefro.org/our-policies>



CHILD PROTECTION POLICY – SCHEDULE 1

CHILD PROTECTION: REPORTING FORM

CHILD PROTECTION: REPORTING FORM	
<p>The information in this form is confidential. It should be used to report concerns in accordance with the Lille Fro Child Protection Policy. In the first instance it should only be sent to the responsible officer.</p> <p>Please try to fill in as much of the form as possible, but leave blank those areas for which you have no knowledge. If you are raising a general concern about behaviour that you have observed, then please make this clear.</p>	
Part 1: About the complainant (if different from the child)	
Complainant name	
Complainants relationship to the child	
Part 2: About the child	
Child / young persons name	
Is the child male or female?	
Child / young person's address	
Who does the child live with?	
Child / young persons date of birth / age	
Has the child given consent to the completion of this form?	Yes / No
Part 3: About the concern	

How did you come to have a concern?

Was abuse observed or suspected?

Was an allegation of abuse made?

Did a child disclose abuse?

Date(s), time(s) and location(s) of any incident(s):

Nature of concern / allegations

Observations made by you (e.g. description of visible bruising, other injuries, child / young persons emotional state etc).

NB: Make a clear distinction between what is fact and observed by you and what is hearsay

Exactly what the child / young person has said and what you have said:

N.B. Record the actual details of what the child says – do not lead them

Any other information:

For example: Is the child disabled? Do they have communication problems or learning disabilities?

Witnesses:

Names and contact information

Were any other children involved?

About the alleged perpetrator:

If appropriate record as much detail as possible about the alleged perpetrator, including name, job title, organisation, address, age, sex and physical description.

External agencies contacted (if any) – date and time of contact and advice received:

Action taken:

Include any immediate security measures

Part 4: Report completed by

Name

Position / Organisation

Signed

Time and Date

Guidance on recording information

- Any concerns, allegations or disclosures should be written down as soon as possible.
- Records should be signed and dated.
- It is important staff and others do not promise confidentiality either to a child disclosing abuse or to an adult disclosing concern about another adult or information about their own behaviour. Staff and others must make it clear that they are obliged to follow the procedure and explain the possible outcomes that may result from information being given to them.
- Records should be detailed and precise. They should focus on what you and the other person said, what was observed, who was present and what happened. Speculation and interpretation should be clearly distinguished from reporting.
- Any concern, disclosure or allegation is alleged rather than proven at this point.
- All such reports should be treated as confidential. They should be passed only to the persons specified in the reporting model above. It is the responsibility of each individual in possession of the information to maintain confidentiality. In certain instances, there will be the obligation for staff and others to report concerns to the appropriate external bodies. This will usually occur as a consequence of the reporting procedure, however if urgent action is required in order to protect children then it may be prior to the reporting procedure.



CHILD PROTECTION POLICY – SCHEDULE 2

ADDITIONAL RESOURCES

LILLE FRO REPRESENTATIVES – MANDATORY RESPONSIBILITIES

1. Lille Fro Representatives must:

- Conduct themselves in a manner consistent with their position and act as a positive role model to children.
- Follow organisational policy and guidelines around the safety of children as outlined in the Child Protection Policy and local law.
- Plan and organise the work and the workplace so as to manage and minimise risks.
- Provide adequate information on studies and programs affecting children to enable them to understand the implications of these activities to a level consistent with their age and development.
- Treat all children with respect and take notice of their reactions to their tone of voice and manner.
- Pay special attention in field studies and programs to the needs of children with disabilities.
- Demonstrate respect for the child's cultural and spiritual beliefs and practices.
- Raise any concerns, issues, problems with the Lille Fro Staff or Executive Director as soon as possible.
- Make sure all allegations or suspicions of abuse are recorded and acted upon.
- Respect each child's boundaries and help them to develop their own sense of their rights, as well as helping them to know what they can do if they feel there is a problem.
- Remember that someone else may misinterpret actions, no matter how well intentioned.
- Acknowledge that all students, children and young people have a right to a safe physical and emotional environment and understand there is a duty of care and responsibility to report and address any possible breach of this Policy as soon as becoming aware of the situation.
- Respect the boundaries of the professional relationship. This includes refraining from giving any child a gift or special privilege of a personal nature (including taking the child on holidays).

2. Lille Fro Representatives must not:

- Smack or hit children or engage in activities to cause physical injury.
- Hold, kiss, cuddle or touch children in an inappropriate and/or culturally insensitive way.
- Sleep in the same room or bed as a child unless they are a parent, family or guardian.
- Enter into the bedroom, changing rooms or bathrooms of a child unless in the case of an emergency or such entry is required as part of that person's defined job description (ie: a hostel warden / house mother / nurse).
- Develop sexual relationships with children and make sexually suggestive comments or innuendo to a child, even as a joke.
- Do things of a personal nature that a child can do for themselves, such as going to the toilet, bathing or changing clothes unless they are a parent, family member or guardian.
- Single out children or encourage meetings with children that are not related to them – for example that are outside the general school, hostel program activity.
- Taking a child out of his/ her hostel or school or natural environment, travelling with a child alone in a car, (even for short journeys) or taking a child on a holiday or trip unless this is unavoidable for safety reasons. If it is unavoidable, make sure that someone else knows what is happening.
- Single out a child, give a child a gift or special treatment, enter into personal relationship, engage in personal correspondence or provide special privileges.
- Act in ways that shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse.
- Condone, or participate in, behaviour of children that is illegal, unsafe or abusive.
- Discriminate against, show differential treatment, or favour particular children to the exclusion of others
- Trivialise or exaggerate child abuse issues.
- Develop a relationship with a student that is, or that can be misinterpreted as having a personal rather than a professional interest in a student. (It is irrelevant if parental consent is given).
- Enter into a personal relationship with any student for which you are responsible for teaching, tutoring, advising, assessing, or for whom you provide pastoral or welfare support. To do so raises serious questions of conflict of interests, trust, confidence, dependency, and of equality of treatment. Such relationships may also have a negative impact on the teaching and learning environment for other students and colleagues.
- Believe it could never happen to them.



CHILD PROTECTION POLICY – SCHEDULE 3 CODE OF CONDUCT

1. Lille Fro's Commitment

Lille Fro is committed to the safety and wellbeing of all children and/or young people who may come in contact with the Lille Fro Foundation. Lille Fro supports the rights of the child and will act to ensure a child safe environment is maintained. Lille Fro encourages all Lille Fro Representatives to actively participate in building and maintaining a child safe environment.

2. Your Commitment

To be read and signed by all Lille Fro Staff activities in for Lille Fro in Ladakh together with Lille Fro Partners, Contractors and their respective Board Members and Management Committee.

I, _____ [insert name], acknowledge that I have read and understand Lille Fro Foundation Limited (ACN 135 5001 521) ('Lille Fro') *Child Protection Policy*, and agree that in the course of my association with Lille Fro, I must:

- > treat children with respect regardless of race, colour, gender, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status
- > not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate
- > not engage children under the age of 18 in any form of sexual intercourse or sexual activity, including paying for sexual services or acts
- > wherever possible, ensure that another adult is present when working in the proximity of children
- > not invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger
- > not sleep close to unsupervised children unless absolutely necessary (ie in the case of emergency), in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible
- > use any computers, mobile phones, video cameras, cameras or social media appropriately, and never to exploit or harass children or access child exploitation material through any medium (including writing personal letters)
- > 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 international and local legislation, including labour laws in relation to child labour and child protection
- > 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, which occurred before or occurs during my association with Lille Fro or its Partners and Contractors

When photographing or filming a child or using children’s images for work-related purposes, I must first seek Lille Fro’s prior permission and further, must:

- > assess and endeavour to comply with local traditions or restrictions for reproducing personal images before photographing or filming a child
- > obtain informed consent from the child and parent or guardian of the child before photographing or filming a child. As part of this I must explain how the photograph or film will be used
- > ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive
- > ensure images are honest representations of the context and the facts
- > ensure the child’s personal details and any identifying information are not published or revealed. This includes the name of the child, the child’s village, community, school, residence, family, guardians, friends or extended community. It may also include any identifying logos or signage (such as school emblems or uniforms). Places and names of any Lille Fro beneficiary must not be published or disclosed under any circumstance.
- > ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.
- > I understand that the onus is on me, as a person associated with Lille Fro, to use common sense and avoid actions or behaviours that could be construed as child exploitation and abuse.

Name: _____

Signed: _____

Date: _____



CHILD PROTECTION POLICY – SCHEDULE 3 CODE OF CONDUCT

CODE OF CONDUCT

ANNEXURE 1: SPONSORSHIP - IMAGE DISPLAY AND COPYING GUIDELINES

1. Displaying Photos of Your Sponsored Child

- a) Sponsors are encouraged to and welcome to display photos of your sponsored child at your home or personal space at work/business to spread the word about Lille Fro's *Little Seeds Child Education Program* and share your experience of supporting a child in his or her education.
- b) However, if you are a group, school or business or corporate sponsor and would like to display information about your sponsored child for group sharing or fundraising purposes please contact us first by emailing contact@lillefro.org.

2. Copying Photos of Children

- a) Lille Fro is required by law and by our own Child Protection Policy to limit the distribution of images and identifying information about the children and beneficiaries supported by our program.
- b) If you sponsor a child, you may enlarge a photo of your sponsored child to display it at home or your personal space at work / business, along with basic personal information (name, age and country only). However, before displaying any additional information or publishing any details of your supported child, you must first obtain our written permission.
- c) If you sponsor a child as a part of a group, you may make additional copies of the photo to give to each financially contributing member of that group.

3. Online Publishing and Emailing Photos of Your Sponsored Child

Lille Fro takes potential abuse of child photographs on the web very seriously. Emailing and publishing photos and personal information of your sponsored child online creates risks to the privacy, dignity and personal safety of the child. We ask you not to place your sponsored child's photo and/or personal information (age, last name, geographical location, health, family or village details, school education or similar information) on a website (internet or intranet) or email it to others.



CHILD PROTECTION POLICY – SCHEDULE 3 CODE OF CONDUCT

CODE OF CONDUCT

ANNEXURE 2: CHILD PROTECTION ON THE LILLE FRO WEBSITE

1. General

Lille Fro is committed to protecting the security, privacy, and dignity of the children who are beneficiaries of our *Little Seeds Child Education Program*. The guidelines below describe how we protect children in relation to the web sponsorship process.

2. Child Security

- a) Children have the right to be completely secure from the fear or reality of any potential abuse (either physical or emotional) resulting from an inappropriate contact by a Lille Fro supporter or any other person.
- b) You will notice as you proceed through our website site that we release only limited information about the children in our program. We don't include last names, community names, details of our partner schools or any other information that might identify the location of the child. We intentionally withhold this information until after the identity of the sponsor is verified.
- c) By agreeing to become a support a child through our *Little Seeds Child Education Program*, you agree you will not attempt to contact a sponsored child, his or her family, community members or school in any manner other than as prescribed and permitted in advance in writing by Lille Fro. Telephone calls, emails or unplanned visits to the child's residence and community are not permitted. All visits in-country must be with the prior written permission and oversight of Lille Fro. Letters and packages may sent providing they comply with our guidelines regarding correspondence which can be found on our website <http://www.lillefro.org>.

3. Child Privacy

- a) We take potential misuse of child photographs on the web very seriously. Children and their families must be assured that Lille Fro is protecting the integrity of their personal information including images. Privacy also demands that children, their families and communities be shielded from any potential inappropriate contact from sponsors or others.
- b) For this reason, downloading, copying, or replicating photos or other information relating to children and their communities on this website is not permitted without our prior written permission. Child profiles are presented for the purpose of conveying appropriate information about the sponsorship relationship, and are not to be distributed.

- c) Our photos of children are encoded with a digital watermark. They can't be downloaded and unauthorised access to the source data has been blocked. Lille Fro monitors the web for inappropriate use of these images and we're committed to stopping misuse. For more information regarding digital watermarking, please see our website www.lillefro.org.

4. Child Dignity

The lives of children, their families, and members of their community should be represented with accuracy and dignity. We consider the children we work with as our partners, working with us to help bring holistic transformation to communities living in poverty. We seek the full, informed consent of parents, guardians, and/or community leaders for a child's participation in our *Little Seeds Child Education Program*.

5. Promoting Lille Fro's Child Education Program

We welcome those who wish to help us find new sponsors. On our website you'll find banner ads and clickable links that you can download and place on your website to encourage others to support a child in his or her education.



CHILD PROTECTION POLICY – SCHEDULE 3 CODE OF CONDUCT

CODE OF CONDUCT

ANNEXURE 3: SPONSOR MAIL MONITORING

1. Communicating with your sponsored child

Sponsoring is a wonderful opportunity to share in Lille Fro's work through the eyes of a particular child and their community and an opportunity for lifelong friendships to develop. Many of Lille Fro's sponsors correspond with their sponsor child and some even visit their sponsored child in-country.

To ensure harmful relationships do not develop Lille Fro ensures that correspondence between sponsors and sponsored children comes via Lille Fro. Communications from sponsors are screened to intercept inappropriate written or visual material that raises child protection concerns. As Lille Fro is a non-denominational organisation we also need to check for political or religious comments that may cause offence or be illegal.

We also protect the privacy of our sponsors by checking that letters do not contain their contact details. This could invite begging letters from people unconnected with the sponsored child. Any correspondence we cannot send will be returned to sponsors explaining our concerns and actions. Copies of correspondence may be copied or held on file by us.

Below is a guide that outlines the type of content that Lille Fro looks for when screening sponsor mail.

- Sexual or sexualised language.
- Excessive use of familiar terminology such as 'love' (NOTE: it is acceptable for a sponsor to finish their letter 'Love Michael').
- Adult content/issues such as:
 - swearing
 - violence
 - exploitation
 - sex relationship/family/financial problems
- Inappropriate photos and images (containing nudity, images of a sexual/intimate nature, exploitative).
- Religious content (sponsors mentioning their religion is appropriate - preaching and evangelism, sending bibles or discriminating against another religion is not).

- Racist language of any sort.
- Political content.
- Requests for gifts from the sponsored child/family other than the usual letter, drawing or handicraft.
- Invitations to visit the sponsor's country.
- Offers of direct financial and other assistance.
- Complaints about Lille Fro (NOTE: We accept that sponsors may have complaints about Lille Fro but they should be directed at/to Lille Fro staff not to sponsored children).