PLUS EDUCATION
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www.pluseducation.org

Australia
U2-3 Gibbes St, Chatswood NSW 2067 | ABN 46 141 849 229
Cambodia
#30 Street 89, Village 6, Veal Vong, Krong Kampong Cham, Kampong Cham Province 030504 | MOC 00039868
India
Uniwork Spaces - 802, 4th Floor, 8th Main Rd East, HRBR Layout 1st Block, Kalyan Nagar, Bengaluru, Karnataka 560043 | CIN U80301KA2013PTC068413

Child Safeguarding Procedures

Document History

Version	Date	Changed by	Description
1.0	01-Aug-2021	Swetha Prakash	Document created from Plus Education's Child Protection Policy

If you require further information regarding this document please contact:
hr@pluseducation.org

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1 PURPOSE

1.1 Plus Education's Child Safeguarding Procedures provide guidance on what our organisation needs to do to meet the Standards defined in our Child Protection Policy (CPP) and Code of Conduct for Working with Children. It establishes processes to ensure that all Plus Education staff, partners, volunteers, contractors and representatives know and meet their responsibilities for safeguarding children.

2 SCOPE

2.1 These procedures apply to all staff, volunteers and other key groups and representatives. 'Staff' refers to: full-time, part-time, international and national, and those engaged on short-term contracts such as: consultancies, researchers, photographers etc. 'Other personnel' refers to visitors, board members, trustees, staff in partner agencies, and any other individuals or groups that have contact with the organisation.

3 INTRODUCTION

What is safeguarding?

3.1 Safeguarding is the action that is taken to support the welfare of children and protect them from harm, abuse or maltreatment.

3.2 Child safeguarding actions include:

- Protecting children from abuse, neglect and maltreatment
- Preventing harm to children's health, development and wellbeing
- Empowering children to reach their full potential
- Building a safe culture and environment for children

3.3 The Australian Human Rights Commission defines a child safe organisation as one that:

- Creates an environment where children's safety and wellbeing is at the centre of thoughts, values and actions
- Places emphasis on genuine engagement with and valuing of children and young people
- Creates conditions that reduce the likelihood of harm to children and young people
- Creates conditions that increase the likelihood of identifying any harm
- Responds to any concerns, disclosures, allegations or suspicions of harm.

3.4 It is of critical importance that child safeguarding is embedded in Plus Education's practices, leadership, governance & culture, as the protection of children, upholding children's rights, and promotion of their wellbeing and development is the foundation of Plus Education's work.

Child Protection Policy and Code of Conduct

3.5 Plus Education has established a (Child Protection Policy CPP) and adopts a Code of Conduct for Working with Children. Our CPP and Code of Conduct comprise child protection and safeguarding obligations and expected behavioural standards, and is to be signed by all Plus Education staff, representatives, partners and visitors to Plus Education programs.

4 PROCEDURES

Recruitment and screening

4.1 Recruitment and screening processes make sure that Plus Education staff and other personnel working with children are suitable, qualified and will reflect child safeguarding principles in practice.

Recruitment

4.1.1 The HR Manager, with the assistance of the appropriate department manager, will:

- Include Plus Education's commitment to child safety and protection in all job advertisements, and notify the applicants that rigorous reference checks and screening, including WWCC/police checks, will be conducted for positions involving working with children.
- Ensure that every position involving contact and engagement with children has a Position Description which sets clear expectations about safeguarding responsibilities, including induction and ongoing training.
- Construct specific selection criteria (as appropriate) regarding attitudes to, and application of, child safeguarding measures to which applicants must respond.
- Ensure that all applicants receive a copy of Plus Education's CPP and are informed of the screening requirements when they download or are sent the application form.
- Assess the level of risk in relation to contact with children, and ensure that positions working directly with children will require the highest level of screening.
- Ensure that new staff provide proof of identify including birth certificate, passport, drivers license and relevant qualifications. Original documents are required.

4.1.2 The HR Manager will make sure that staff and other personnel read and sign the Plus Education's CPP and Code of Conduct upon acceptance of the position.

4.1.3 All positions will be subject to a probationary period depending on the length of the contract. The HR Manager will define the probationary period and highlight it clearly in employment contracts.

Interviews

4.1.4 The HR department, in collaboration with the CEO, will select the interview panel based on the job position requirements, which will consist of an appropriate mix of expertise and skills to best carry out the interview. Panels will consist of a minimum of two representatives, with atleast one female representative, along with the HR manager.

4.1.5 The panel will conduct interviews for all positions, face-to-face where possible, with telephone/video interviews permitted in the international/remote context, and on an as required situational basis.

4.1.6 For positions working directly with children, the panel interview will:

- Use behavioural-based questions to ask for examples of the candidate's past behaviour and experiences.
- Explore the candidate's motivations for working with children, which will include value-based questions seeking information about the candidate's attitudes to children, professional boundaries, accountability, teamwork and how they have responded to ethical dilemmas in the past.

Referee checks

4.1.7 The HR Manager, or nominated staff/personnel responsible for hiring, will undertake rigorous reference checks that include direct conversations with at least two (2) professional referees, including the applicant's current/most recent employer.

4.1.8 Reference checks, undertaken by the appropriate responsible person, should:

- Ascertain the applicant's attitudes and behaviours in previous roles that involved working with children.
- Establish whether the applicant has ever had a child-related complaint made against them.
- Ascertain and confirm that the applicant would be suited to a role working with children.

4.1.9 The HR Manager or responsible staff/personnel can request additional references as required. Written references will be accepted only in cases where a video or phone conversation is not possible.

Training and awareness

4.2 Training and awareness ensures everyone associated with Plus Education, including staff and other personnel, are equipped with the knowledge, skills and awareness to keep children safe.

Induction

4.2.1 Immediately after appointment, the HR Manager and appropriate department manager will ensure that employees and personnel receive a formal induction to make them aware of their child safeguarding responsibilities.

4.2.2 The HR department, as part of this induction process, will ensure that staff and other personnel receive Plus Education's policies handbook, as well as the CPP and Code of Conduct for Working with Children,

4.2.3 New staff and other personnel are required to sign the CPP and Code of Conduct prior to their commencement date.

4.2.4 The HR department and CEO will consider roles and situations with higher risk, and will make sure that the induction program is appropriately tailored to meet the needs of different personnel.

4.2.5 The HR department will review the induction program and materials on a regular basis and make changes accordingly with feedback from staff and the board.

4.2.6 The HR department will maintain administrative records to ensure that all staff and personnel have participated in the program.

Ongoing training

4.2.7 The HR manager will ensure that a refresher training is given to all staff and representatives once a year. This training can be in the form of a workshop, online training and/or group training program.

Risk assessment and management

4.3 Plus Education risk assessment and management strategies focus on preventing, identifying and mitigating risks to children.

4.4 The Plus Education CEO and board ensures that all implementing partners conduct child safeguarding risk management exercises for funded programs that involve direct or indirect contact with children. Directed and overseen by Plus Education management and board, the appropriate in-country personnel will undertake this process.

4.5 The Plus Education 3-step risk assessment process is outlined in our Child Protection Risk Assessment Policy. This framework is based on the DFAT Child Protection Guidance Note, and determines the level of child protection risk that exists and what actions should be taken.

4.6 There are three steps to the process:

STEP 1: Determine whether the activity involves working with children or contact with children. There are two parts to this step:

1. Determine activity level of working with or contact with children (*See Appendix A*)
2. Activity Inherent Risk (*See Appendix B*)

STEP 2: Determine the organisation is child-focused and what child protection controls are in place. There are two parts to this step:

1. Organisation Level Contact with Children (*See Appendix C*)
2. Organisation Inherent Risk (*See Appendix D*)

STEP 3: Establish the overall potential child protection risk context and whether a full child protection risk assessment is required (*See Appendix E*).

4.7 The process will indicate whether a full child protection risk assessment is required. If required, Plus Education management conducts a risk assessment using the organisation's internal risk processes and risk management framework.

4.8 Plus Education management will conduct a child protection risk assessment on every new and emerging program and project, included in the project management cycle.

4.9 Staff and other personnel should continually be aware of risks, and be actively minimising opportunities and situations where children can be harmed.

Reporting procedures

4.10 Plus Education CEO, management and board is responsible for ensuring that processes for raising child safety concerns and complaints are responsive, thoroughly understood and accessible by children, families, relevant communities, staff and other personnel.

4.11 Through induction procedures, material and ongoing training, Plus Education staff and other personnel should be aware of and make sure that they have access to child abuse incident reporting procedures, including the Child Protection Incident Form (*See Appendix F*).

4.12 All staff and other personnel should be alert to signs that may suggest a child is in need of help.

4.13 Plus Education staff and other personnel must always report concerns or allegations of child abuse. These concerns may relate to a child or a staff member involved in the organisation or a concern about a child or person/s outside of the organisation's programs.

4.14 Staff, other personnel and people in the community should immediately follow Plus Education's child abuse reporting procedures if they have a complaint or concern. (See Appendix G)

Who to report to?

4.15 All child abuse reports should be made to the CEO on (+91 7022038664), who will ask for the completion of the Child Protection Incident Form and then assess the nature of the allegation and respond appropriately.

What should be reported?

4.16 Any disclosure or allegation from a child/community member or staff regarding the safety/abuse exploitation of a child.

4.17 Any observation or concerning behaviour exhibited by Plus Education staff, volunteer or other relevant stakeholder or personnel that breaches the Plus Education code of conduct for working with children.

4.18 Inappropriate use of the organisation's photographic equipment or computers including evidence of child pornography.

4.19 Staff engaging in suspicious behaviour that could be associated with sexual exploitation or trafficking.

Reporting child abuse allegations in Australia

4.20 Child abuse reports should be made directly to the CEO. An initial assessment will be made based on the information and a decision will be made, in consultation with the Chairman, on what steps to take.

4.21 After the situation has been assessed, reporting will be conducted by the appropriate representative and can either be made to the local state police or the state child protection authorities.

4.22 If there is an allegation or suspicion of child sexual abuse by a staff member or volunteer in the organisation, these matters will be reported to the state police.

4.23 If there are concerns that a child is being sexually abused by someone external to the organisation, Plus Education management will contact the state police and/or child protection authorities.

4.24 Concerns about people engaging in child sex tourism, child sex trafficking and child pornography should be reported to the Australian Federal Police (Transnational Sexual Crimes Squad). The representative of Plus Education should call the AFP's Crime Stoppers on 1800 333 000.

Reporting child abuse allegations overseas

4.25 Child abuse reports should be made directly to the CEO. An initial assessment will be made based on the information and a decision will be made, in consultation with the Chairman, on what steps to take.

4.26 The CEO and Chairman will gather all the relevant information and address any health and protection needs of the child. The matter may then be directly referred to the local police and or authorities if the allegations are considered to be criminal offences.

4.27 If the incident has occurred outside of the program the matter will be referred to an external body or agency dealing with child protection matters in the country.

Child-safe reporting

4.28 Children and community members with whom Plus Education works are provided with information about how to report any child protection concerns about Plus Education staff members and others.

Responding to incidents

4.29 The CEO and chairperson should facilitate an immediate response that protects the child from further potential abuse or victimisation once the allegation is made.

4.30 The CEO and chairperson, or other suitably trained representatives who are authorised to do so, will conduct an incident investigation as soon as possible. The CEO will determine the level of investigation required once the severity of the incident is determined.

4.31 Where child protection or wellbeing concerns are identified, the CEO or other suitably trained representatives will provide an immediate response based on a differential response mechanism. The response mechanism includes appropriate disciplinary actions proportionate to the severity of the incident.

4.32 Everyone involved in the process should make every effort to protect the rights and safety of the child throughout the investigation and response.

4.33 Any employee who intentionally makes false and malicious allegations, will face disciplinary action.

5 RESPONSIBILITIES

Leadership, governance and culture

5.1 Child safeguarding is embedded in Plus Education's leadership, governance & culture, and is everyone's responsibility.

5.2 Plus Education publicly commits to child safeguarding and takes a zero-tolerance approach to child abuse, harm or maltreatment.

Compliance, monitoring and review

5.3 The CEO, management and board is responsible for implementing, monitoring, reviewing and ensuring compliance with these procedures.

5.4 Plus Education's child safeguarding procedures will be reviewed every year. The Board will manage the review of this document, and staff as well as representatives of different stakeholder groups will be consulted in this process.

Reporting

5.5 The CEO and management team will report annually to the board on child safeguarding matters and procedures, including incidents. In the case of a major breach of policy, the CEO will immediately inform the Board of Directors and seek their involvement in investigating the matter.

Records management

5.6 Staff, and the HR department, must maintain all records relevant to administering these procedures in a recognised Plus Education recordkeeping system.

6 DEFINITIONS

Terms and definitions

Child abuse: abuse happens to male and female children of all ages, ethnicity and social backgrounds, abilities, sexual orientation, religious beliefs and political persuasion. Child abuse includes physical, sexual, emotional, neglect, bullying, child labour and domestic violence. Both boys and girls can be the victims of abuse, and abuse can be inflicted on a child by both men and women, as well as by young people themselves.

Child safeguarding: the action that is taken to promote the welfare of children and protect them from harm.

Child protection: the safeguarding of children from violence, exploitation, abuse, and neglect

Harm: any detrimental effect of a significant nature on a child's physical, psychological or emotional wellbeing.

Maltreatment: cruel, violent or mistreatment of a child.

Neglect: persistent failure or the deliberate denial to provide the child with clean water, food, shelter, sanitation or supervision or care to the extent that the child's health and development are placed at risk.

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

7 RELATED LEGISLATION AND DOCUMENTS

Child Protection Policy
Child Protection Risk Assessment Policy
Code of Conduct for Working with Children
DFAT Child Protection Guidance Note
United Nations Convention on the Rights of a Child

8 FEEDBACK

8.1 Plus Education staff, board and partners may provide feedback about this procedures document by emailing HR at hr@pluseducation.org

9 APPENDIX

Appendix A: Risk Assessment Process – Step 1 Part 1

What is the level of working with or contact with children at the activity level?

The below questionnaire informs the determination of the level of inherent risk (*see Appendix B*).

Inherent risk	Personnel will be deployed in-country?
	Personnel will be working in a remote and/or rural location?
Degree of Isolation	Involves being alone with children? (not frequently enough to be working with children)
	Involves activities that are away from organisation location
	Involves meeting one-on-one with children? (not frequently enough to be working with children)
	Involves unpredictable or remote settings?
Online contact or access to personal details	Involves direct one-on-one or group access to children online?
	Involves supervising child-to-child online contact?
	Involves online access to a child's or children's personal and/or confidential information?
	Inadequate/missing safe options for children to report unwanted attention or inappropriate behaviour by others?
	Involves educating children and supporting adults on cyber safety?
Vulnerability of child/children	Engages with children whose true or cognitive age impacts on their ability to protect themselves?
	Engages with children who have challenges that contribute to their vulnerability? (e.g. psychological, situational)
	Engages with children who do not have many support systems?
Degree of physical contact	Involves demonstrating a skill to children?
	Position involves need for physical contact/touching children?
	Involves providing a personal service? (e.g. washing, dressing, toileting)

Degree of monopoly	Monopoly on provision of goods and/or services • Medical? • Food distribution? • Career training (sports/musical)?
Degree of supervision	Involves personnel having unsupervised contact with children?
	Activities/engagement with children is not observed or monitored? insufficient number of trained staff to supervise activities/engagement with children?
Degree of trust	Involves developing close, personal, long term relationships with children?
	Involves transporting youth?
	Involves one or more of the following: One-on-one supervision, overnight supervision, out of town activities, advising or offering guidance to youth or spending extended periods of time with youth e.g. camps?
	Contributes to important decisions regarding the future of children?
Access to Property	Has access to personal/confidential information?
	Adult has a perceived or actual level of authority? (from child perspective)
Skills and knowledge required	Requires specific skills, knowledge, qualifications or service eligibility requirements to undertake a child related position?
Child labour	Possibility that activity will lead to the employment of children?
	Possibility that activity will lead to the removal of children from school?
	Possibility that activity will lead to children being employed in hazardous work?
Vulnerability of parent/carer	Engages with parents whose true or cognitive age impacts on their ability to protect their children?
	Engages with parents who have challenges that contribute to their ability to provide care? (e.g. psychological, situational)
	Engages with parents who do not have many support systems?
Vulnerability can include:	Physical and mental disabilities, homelessness, child sex workers or parents who are sex workers, children and families impacted by disasters, displaced, migrants, refugees and asylum seekers, children in contact with the law, children that have been subject to trafficking, orphans, unaccompanied minors and the very young?

Appendix B: Risk Assessment Process – Step 1 Part 2

Activity Inherent Risk

Based on your responses in Part 1, identify the inherent risk of the activity using the table below. Activity Risk is the level of potential risks to children due to the nature of the activity (working with children) or the design of the activity (design of the activity introduces risks to children).			
LOW	No contact	☐	The activity does not involve any individuals working in-country (Nil Contact)
MODERATE	Contact with Children	☐	The activity involves or may involve contact with children (working in-country, remote or rural area)
HIGH	Working with Children	☐	The activity involves working with children

Appendix C: Risk Assessment Process – Step 2 Part 1

Organisation Level Contact with Children

Organisation Profile	
Size of organisation	Number of staff employed by the organisation either paid or unpaid
Types of Personnel	Contractors
	Permanent staff
	Volunteers
	Sponsors
	Other
Sites	Number of sites operated
	Proximity of sites to central management
	Sites are located in unpredictable or remote / rural location
Systems and Controls - Strength of systems and controls scaled by number of 'yes' responses. Use the scale 0=poor, 8=strong for your answers	
Child protection policy and procedures	Child Protection Policy in place?
	Recruitment practices, screening completed for all staff, before commencing work?
	Notifications/Incident reporting procedures in place?
	Staff receive child protection training?
	Boundaries for appropriate behaviour/code of conduct are implemented?
	Feedback on staff performance recorded?
	Record keeping procedures are in place (meetings, activities, incidents, reports, logs, record of complaints)?
	Organisation checks if third party service providers are child safe?

Focus - A child-focused organisation is an organisation that answers ‘yes’ to any of the questions below.	
Types of activities	Does the organisation across all of its operations provide any direct activities/services for children?
	Does the organisation provide any humanitarian relief?
Business model/services provided by organisation	Organisation provides Residential/Orphanage/Shelter services?
	Organisation uses a child sponsorship model?
	Organisation allows sponsors to visit with children?
	Organisation is part of a ‘voluntourism’ program?
	Organisation requires technical experience/expertise to implement child related services?
	Organisation uses children and/or images of children as a ‘product’ for fundraising activities?

Appendix D: Risk Assessment Process – Step 2 Part 2

Organisation Inherent Risk

Organisational risk is the level of potential risk posed by the organisation due to their ability to address child protection risks through their policies, procedures and systems and the type of work the organisation engages in (e.g. if they are a child focussed organisation, their risks will be higher).			
LOW	NO FOCUS	☐	Organisation is not a child-focused organisation
MODERATE	FOCUS & STRONG SYSTEMS	☐	Organisation is a child-focused organisation and has good child protection systems in place
HIGH	FOCUS & POOR SYSTEMS	☐	Organisation is a child-focused organisation and has poor or nil child protection systems in place

Appendix E: Risk Assessment Process – Step 3

Step 3: Establish the overall potential child protection risk context and whether a full child protection risk assessment is required

Organisation level of contact with children and systems in place (organisation inherent risk from Step 2)	Activity Level of Contact with Children (activity inherent risk from Step 1)		
	NIL (LOW)	CONTACT (MODERATE)	WORKING (HIGH)
NO FOCUS (LOW)	• No further assessment required	• No further assessment required, monitor for changes	• Full assessment required
FOCUS & STRONG SYSTEMS (MODERATE)	• No further assessment required, monitor for changes	• No further assessment required, monitor for changes	• Full assessment required
FOCUS & POOR SYSTEMS (HIGH)	• Full assessment required	• Full assessment required	• Full assessment required

If the matrix indicates a full child protection risk assessment is required Plus Education conducts a risk assessment using the organisation's internal risk processes and documentation using their own risk management framework.

Appendix F – Child Protection Incident Form

CHILD PROTECTION INCIDENT REPORT

Please complete this form to document and report any child protection concerns, a breach or potential breach of the Working with Children Code of Conduct. All child protection concerns should be reported immediately. This report must be made in strict confidence.

IMPORTANT! It is your responsibility to report any allegations – NOT to investigate. You do not have to have proof of your concern or answers to all of the questions in order to complete this form.

Attach any and all copies of any documentation including doctor receipts, minutes of phone calls, police reports etc.

NAME OF THE REPORTER:

PRIORITY LEVEL: (HIGH/MEDIUM/LOW)

NAME OF CHILD:

DATE OF INCIDENT:

TIME OF INCIDENT:

WHERE DID THE INCIDENT OCCUR?

WHAT HAPPENED?

WHAT ACTION WAS TAKEN?

NAMES OF ANYONE YOU SPOKE TO:

FOLLOW UP ACTION REQUIRED:

PASS THIS FORM ONTO THE HR MANAGER VIA EMAIL – hr@pluseducation.org

DATE COMPLETED:

Appendix G – Reporting Procedures

REPORTING CHILD PROTECTION CONCERNS IN AUSTRALIA:

Who can report?

Staff, interns, volunteers, partners, contractors, children or the community, visitors

Raise concerns about

What to report

a) Any disclosure or allegation from a child/community member or staff regarding the safety/abuse exploitation of a child.

b) Any observation or concerning behavior exhibited by an The Group staff, intern, volunteer or other relevant stakeholder that breaches the The Group Code of Conduct for Working with Children.

c) Inappropriate use of the organization's photographic equipment or computers including concerns regarding child pornography.

d) Staff or others engaging in suspicious behavior that could be associated with sexual exploitation or trafficking.

When to report

Immediately to

Who to report to?

The CEO Swetha Prakash on (+91 96866 47788) who will ask you to complete the Child Protection Incident Form and then assess the nature of the allegation

The Group Response

1. If the allegation is assessed as serious the CEO and The Group Board will confidentially discuss the allegation and decide how the allegation will be addressed
2. Identify Risk to the Child (immediate / potential) and alleged perpetrator
3. Develop Immediate Action Plan to ensure child safety which may include one or some of the following:

Low level breaches of the CoC will be managed in line with The Groups CPP.

If criminal offence- Report Concerns to Authorities:

- Local Police
- Australian Federal Police
- Child protection authorities.

Ensure safe Referral and medical and/or counseling support for child and person making the report

40K PLUS REPORTING CHILD PROTECTION CONCERNS IN INDIA & CAMBODIA:

Who can report?

Staff, interns, volunteers, partners, contractors, children or the community, visitors

Raise concerns about

What to report

a) Any disclosure or allegation from a child/community member or staff regarding the safety/abuse exploitation of a child.

b) Any observation or concerning behavior exhibited by an The Group staff, intern, volunteer or other relevant stakeholder that breaches The Group Code of Conduct for Working with Children.

c) Inappropriate use of the organization's photographic equipment or computers including concerns regarding child pornography.

d) Staff or others engaging in suspicious behavior that could be associated with sexual exploitation or trafficking.

When to report

Immediately or within 24 hours to:

Who to report to?

40K Plus Head of Programs: Bharathy on (+91 9677014441) – who will contact The Group CEO.

OR

The Group Response

The Group CEO: Swetha Prakash on (+91 96866 47788) – who will ask you to complete the Child Protection Incident Form and then assess the nature of the allegation

1. If the allegation is assessed as serious the CEO and The Group Board will confidentially discuss the allegation and decide how the allegation will be addressed
2. Identify Risk to the Child (immediate / potential) and alleged perpetrator
3. Develop Immediate Action Plan to ensure child safety which may include one or some of the following:

Low level breaches of the CoC will be managed in line with The Groups CPP.

If criminal offence- Report Concerns to Authorities:

- Local Police
- Australian Federal Police
- Child protection authorities

Ensure safe Referral and medical and/or counseling support for child and person making the report

IN EXCEPTIONAL CIRCUMSTANCES: Investigate and manage the complaint internally if it is known to be too dangerous for the child and others to refer externally. The decision to take this course of action must be signed off by The Group Board and be managed (with external expertise if available) according to the 40K guidelines for managing child protection allegations