



# ***Lukautim Pikinini Gut Long Birua***

## **Child Protection Policy**

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## DOCUMENT VERSION

Date	Comments
5 November 2016	Document endorsed by Management Committee
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## POLICY AMENDMENTS

This is a working document and subject to amendment. This Policy will be available in English only. Any suggestions about this Policy should be directed to the Operations Directors, Program Manager or the Chief Executive Officer/Senior Social Worker (CEO/SSW) so changes can be considered. When suggestions are raised, the matter will be raised with the Executive Management Committee (EMC) for consideration. Any amendments or changes to the Policy will be submitted to the Board for endorsement.

The Operations Directors are responsible for maintaining this document; including updating confirmed changes, informing staff of the changes, and disseminating the latest version across the organisation.

Any changes or amendments involve the following steps:

- ✓ Updating the Document Version table at the top of this page;
- ✓ Updating the Schedule of Changes table in Appendix A;
- ✓ Updating the relevant provision in this policy;
- ✓ Replacing the updated version of the policy eg. Dropbox, website;
- ✓ Updating the <https://femilipng.org/about/complaints/child-protection/> page on the website
- ✓ Printing a hard copy of the updated manual for the office;
- ✓ Communicating the changes to all staff; and
- ✓ Archiving the old version of policy.

# TABLE OF CONTENTS

<b>DOCUMENT VERSION</b> .....	<b>2</b>
<b>POLICY AMENDMENTS</b> .....	<b>2</b>
<b>1.0 INTRODUCTION</b> .....	<b>4</b>
1.1 Purpose .....	4
1.2 Scope .....	4
1.3 Definitions .....	5
<b>2.0 GUIDING PRINCIPLES</b> .....	<b>7</b>
2.1 Zero Tolerance of Child Abuse .....	7
2.2 Child Rights .....	7
2.3 Duty of Care .....	7
2.4 Shared Responsibility .....	7
2.5 Representation .....	8
2.6 Confidentiality .....	8
<b>3.0 OPERATING CONTEXT</b> .....	<b>8</b>
3.1 Organisational Characteristics .....	8
3.2 Interaction with Clients, including Children .....	9
3.3 Child Protection Risks .....	10
<b>4.0 POLICY STATEMENTS</b> .....	<b>10</b>
<b>5.0 IMPLEMENTATION</b> .....	<b>11</b>
5.1 Child Protection Code of Conduct .....	11
5.2 Risk Management .....	11
5.3 Accessibility .....	11
5.4 Training and Induction .....	12
5.5 Reporting Procedures .....	12
5.6 Nomination of Child Protection Delegate .....	12
5.7 Photos, Images and Story Gathering .....	12
5.8 Recruitment .....	13
5.9 Visitors .....	13
<b>6.0 CHILD PROTECTION REPORTING PROCEDURES</b> .....	<b>13</b>
6.1 Responsibility to Report .....	13
6.2 Reporting Procedure and Flow Chart .....	14
6.3 Reporting by Other Parties .....	15
6.4 Confidentiality and Safety .....	15
6.5 Investigation .....	15
6.6 Donor and Partner Notification .....	16
<b>7.0 MONITORING AND REVIEW</b> .....	<b>16</b>
<b>8.0 RELATED DOCUMENTS</b> .....	<b>16</b>
<b>Appendix A – Schedule of Changes</b> .....	<b>17</b>

# 1.0 INTRODUCTION

To promote child protection within the organisation, Femili PNG has developed this document, the *Lukautim Pikinini Gut Long Birua* – Child Protection Policy and an accompanying Child Protection Code of Conduct. These documents exist prevent, mitigate and respond to child exploitation, abuse and harm.

The documents' content is informed by the principles in the United Nations Convention on the Rights of the Child (CRC), PNG law (including the Lukautim Pikinini Act 2015) and contextual knowledge and experience. Femili PNG partner organisations' child protection policies have also been drawn upon to ensure policy coherence.

## 1.1 Purpose

The purpose of this Policy is to:

- ensure that child protection is clearly promoted to all engaged with Femili PNG;
- facilitate the prevention of child abuse occurring within Femili PNG;
- promote an organisational culture of child safety;
- ensure that all parties are aware of their responsibilities for identifying possible occasions for child abuse and for establishing controls and procedures for preventing such abuse and/or detecting such abuse when it occurs;
- provide guidance to Femili PNG staff and representatives as to action that should be taken where they suspect any abuse within or outside of the organisation, including by those in stakeholder organisations Femili PNG works with;
- provide a clear statement forbidding any such abuse;
- provide assurance that any and all suspected abuse will be reported and fully investigated; and
- provide clear guidelines for Femili PNG management of child protection incidents or allegations.

## 1.2 Scope

Femili PNG's core business is to provide case management services to survivors of family and sexual violence and our integrated approach means we work in a variety of settings throughout the community. These include but are not limited to working at safe houses, courts, police stations, the Welfare office, hospitals and government and non-government agencies. We also assist with transport and relocation of clients.

Femili PNG has been operating a case management centre in Lae since 2014, and in 2018 it began operating a case management centre and safe house in Port Moresby as part of the Bel isi PNG initiative. The Femili PNG Goroka outpost opened in 2021.

This Policy applies to anyone who represents Femili PNG including, but not limited to, staff, volunteers, contractors, security guards, visitors and Board members (hereafter referred to as 'Femili PNG staff and representatives'). Its content will be advocated to our partners, donors and others we work with as part of our organisational commitment to prevent, mitigate and respond to child exploitation, abuse and harm.

This Policy applies to all Femili PNG staff and representatives in all operating contexts and at all times – during and outside of standard business hours. By becoming a staff member or representative of Femili PNG the obligations and requirements of this Policy are accepted as mandatory.

For clarity, this Policy applies both to staff who are providing services directly to clients (for example case management and safe house services) and also to all other Femili PNG staff and representatives whether they are engaged in logistics, administration, financial, media, governance, security or any other roles.

This Policy also applies to partners who have agreed to acknowledge, adopt or comply with Femili PNG's Child Protection Policy and Code of Conduct.

### **1.3 Definitions**

- Child:** As defined by the CRC and as set out in the *Lukautim Pikinini Act 2015*, any person under the age of 18 years is a child.
- Child abuse:** Child abuse includes all forms of physical, emotional and sexual abuse, violence in the home (sometimes referred to as domestic violence or family violence), neglect, commercial sexual exploitation (such as child prostitution), child trafficking and child labour as defined below. (Child abuse is not limited to only males or females, it can happen to any gender and involves the abuse of children's rights as outlined in the CRC).
- Child emotional abuse:** A persistent attack on a child's self-esteem. For example, but not limited to, teasing, name-calling, threatening, ridiculing, intimidating or isolating the child.
- Child labour:** Work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Child labour refers to work that is mentally, physically, socially or morally dangerous and harmful to children and that interferes with their schooling by:
- ✓ depriving them of the opportunity to attend school;
  - ✓ obliging them to leave school prematurely; or
  - ✓ requiring them to attempt to combine school attendance with excessively long and heavy work.
- Child neglect:** The persistent failure, where there are means, or the deliberate denial to provide a 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.
- Child physical abuse:** When a person purposefully injures, or threatens to injure a child. For example, but not limited to, slapping, punching, shaking, kicking, burning, shoving, grabbing and throwing stones and other objects.
- Child protection:** An activity or initiative designed to protect children from any form of harm, particularly arising from child abuse or neglect.

<b>Child protection incident:</b>	<p>A child protection incident is (a) any form of child abuse as defined in section 1.3 Definitions; <b>or</b> (b) any breach of this Policy or the Femili PNG Child Protection Code of Conduct,</p> <p><b>and</b>, that is:</p> <p>(c) committed by a Femili staff or representative; <b>or</b> (d) where Femili PNG has a duty of care towards the child.</p>
<b>Child rights:</b>	<p>Children have the “right to life, survival and development” where development encompasses physical, emotional, cognitive, social and cultural development.</p>
<b>Child sexual abuse:</b>	<p>When a child is used by another child, adolescent or adult, for his or her own sexual stimulation or gratification. Sexual abuse involves contact and non-contact activities which encompasses all forms of sexual activity involving children, including exposing children to pornographic images, or taking pornographic photographs of children.</p>
<b>Child trafficking:</b>	<p>Relates to any role in the recruitment, transportation or receipt of children for the purpose of exploitation, by means of threat, force or other forms of coercion. This includes abuse of power.</p>
<b>Commercial sexual exploitation:</b>	<p>Where a child is sexually abused or exploited and the child or a third person/s is remunerated in cash or kind.</p>
<b>Cultural safety:</b>	<p>An environment that is spiritually, socially and emotionally safe, as well as physically safe for people; where there is no assault challenge or denial of their identity, of who they are and what they need.</p>
<b>Duty of care:</b>	<p>Duty of care is a term used to define the complex obligation that exists between Femili PNG and the people with whom it has a relationship. Femili PNG (and all its office holders and staff) hold a duty to take reasonable care of a person who is reasonably likely to be affected by the activities of Femili PNG. For more information, see Section 2.0 Duty of Care Policy in Femili PNG’s Case Management Policy and Procedure Manual.</p>
<b>Family and sexual violence:</b>	<p>Family violence means any violence between family members including current or former partners in an intimate relationship. Family violence may include physical, sexual, emotional and financial abuse, stalking, damage to property, and control through socially isolating the victim, or threats to do any of the aforementioned acts.</p> <p>Sexual violence means any sexual act against a person’s sexuality using coercion including an attempt to obtain a sexual act and unwanted sexual comments or advances, by any person regardless of their relationship to the victim, in any setting, including but not limited to home and work.</p> <p>Family and sexual violence encompasses family violence and sexual violence as described above. It should be noted that while family violence may be perpetrated by family members, sexual violence may be perpetrated by any person regardless of their</p>

**Femili PNG staff and representatives:**

This refers to anyone who represents Femili PNG including, but not limited to, staff, volunteers, contractors, visitors, security guards and Board members.

**Reasonable grounds for belief of child abuse:**

This is a belief based on reasonable grounds that child abuse has or is occurring. Considerations forming such reasonable grounds may include:

- ✓ relevant information from a credible person; and/or
- ✓ relevant information about the alleged perpetrator; and/or
- ✓ the child may have stated abuse has occurred; and/or
- ✓ there may be other signs of abuse.

Note that 'proof' is not required at this stage.

## **2.0 GUIDING PRINCIPLES**

Femili PNG's *Lukautim Pikinini Gut Long Birua* – Child Protection Policy and practices adhere to the following guiding principles:

### ***2.1 Zero Tolerance of Child Exploitation, Abuse and Harm***

Femili PNG's staff and representatives understand that any form of child abuse and exploitation is unacceptable and will not be tolerated by anyone who is working within our organisation or who represents our organisation. We will not permit staff or representatives who present a risk to child safety to work for or represent our organisation.

Femili PNG will ensure that all staff and representatives, new and existing, are made aware of this policy and their responsibilities in preventing, reporting and responding to it, and understand that abiding by this policy is mandatory.

### ***2.2 Child Rights***

Femili PNG is committed to protecting and promoting the rights of all children, including the right to safety, without fear of abuse or exploitation, and to have their views heard on matters affecting them, as enshrined in the CRC.

### ***2.3 Duty of Care***

Femili PNG abides by its duty of care to take all reasonable steps to ensure that the children it assists or comes into contact with during the course of our service delivery, are kept safe from harm and to ensure staff and representatives have access to the training and systems to ensure this duty is met. This includes having child protection, case management and safe house operations policies in place and ensuring that staff understand and implement them. (See Section 1.3 for Duty of Care definition).

### ***2.4 Shared Responsibility***

Femili PNG's interagency model of working in close coordination with a range of organisations requires Femili PNG to promote child protection as a responsibility shared by all. (For example, Femili PNG will not work to protect children from harm by day, and then arrange for children's

accommodation where they are potentially unsafe at night.) In accordance with its operating model, Femili PNG is committed to developing broad understanding among the stakeholders it works with of the importance of child protection and ways to achieve it.

Where possible, Femili PNG shall encourage partners to acknowledge, adopt and comply with our Child Protection Policy through the use of MoUs and other agreements. Some partners may require additional capacity building in child protection which Femili PNG will offer through training and guidance.

Femili PNG understands that, in many cases, this policy cannot bind other stakeholder organisations it works with, but as part of Femili PNG's commitment to child protection will make clear to all its zero tolerance of child abuse.

## **2.5 Representation**

Femili PNG believes all children, regardless of their gender, ethnicity, religious and political beliefs, family background, economic status, physical or mental capacity have a right to assistance and will be assessed according to Femili PNG's intake procedures without discrimination. This includes children who have engaged in criminal activities, including child survivors who are also perpetrators of violence. This is in accordance with CRC Article 40, and is in recognition of international evidence that children affected by violence and abuse often (but not always) act out similar behaviours, particularly if they are unsupported child survivors.

## **2.6 Confidentiality**

Femili PNG will ensure it provides a service and environment where children are respected and feel safe at all times. This includes Femili PNG meeting its obligation to maintain the confidentiality of children's information as much as practicably possible, unless for example Femili PNG is required by legal or professional duty to disclose information, or, if the child is able to, the child gives permission for disclosure. If Femili PNG is compelled to disclose information, and the child is of an age where s/he is able to comprehend the relevant issues, Femili PNG will ensure the child's right to be engaged on the issue is met.

# **3.0 OPERATING CONTEXT**

## **3.1 Organisational Characteristics**

Femili PNG is a PNG NGO that runs a case management centres to assist survivors of family and sexual violence to access the services they need. Our target population is women, men and children who are survivors of intimate partner violence, sexual violence or child abuse.

In Lae, Femili PNG works closely with service providers including: Angau Hospital Family Support Centre (FSC), the Lae Police Family and Sexual Violence Unit and Sexual Offences Squad, the Morobe Provincial Police Headquarters, the Police Prosecutor's Office, the District Court, the National Court (through the Victim Liaison Officer), the Morobe Family and Sexual Violence Action Committee (FSVAC), City Mission, Yana Advocacy, Save the Children, Salvation Army, Community Development Welfare Department and Milford Haven District Health Centre.

In Port Moresby, Femili PNG operates the Bel isi PNG safe house and case management centre under a sub-recipient contractual agreement with Oil Search Foundation (OSF), managed by *Pacific Women Shaping Pacific Development [Pacific Women]* on behalf of the Department of Foreign Affairs and Trade (DFAT), involving a number of partners and key stakeholders from the

private sector and government. In this context Femili PNG works closely with OSF, Bank South Pacific, National Capital District FSVAC, the national FSVAC, FSC at Port Moresby General Hospital, the Business Coalition for Women, Police, other safe houses, other family and sexual violence and justice services, and private sector companies who are subscribers to Bel isi PNG.

In Goroka, Femili PNG operates a case management outpost which is co-located with the Community Development Office. Femili PNG works closely with the Community Development Office, including the Child Protection Officer, FSVAC, and other service providers and NGOs on the referral pathway.

### **3.2 Interaction with Clients, including Children**

Femili PNG staff directly assist clients, including child clients, in a number of ways including through:

- listening and advising to them on their options;
- making referrals to other service providers and supporting them to attend appointments, including through providing transportation;
- case management processes including intake and interview;
- arranging emergency support such as accommodation in safe houses and provision of necessities such as food and clothing;
- legal assistance, including to access court;
- providing security in high risk cases;
- relocation services, including family tracing and assessment of whether survivors' situations would improve if relocated, and if so, to facilitate relocation and secure establishment in the new location; and
- providing temporary accommodation services through the Bel isi PNG safe house.

Femili PNG staff and representatives interact with children in a variety of ways including:

- as a primary client of Femili PNG (including Bel isi PNG);
- as a child in the care of a Femili PNG client;
- incidentally during their course of their work (for example at a safe house or other partner organisation); and
- outside of work during their personal lives.

Femili PNG undertakes its work with children guided by its Case Management Policy and Procedure Manual and related policies, including this Child Protection Policy. Femili PNG's policies are aligned with PNG Government policy and legislation, and Femili PNG works in conjunction with PNG child welfare officers and other relevant authorities when providing assistance to children.

Below are some examples of situations where Femili PNG staff and representatives need to address child protection risks and issues:

- where the child of a Femili PNG client in a violent relationship is at risk of physical and mental harm;
- where a child accepted into the Bel isi PNG safe house with a parent is considered to be at risk of abuse or has been abused by either the accompanying parent or another adult in a caring or parental relationship with the child;
- where a child is abused by a resident in the Bel isi PNG safe house;
- where a child has been exposed to family violence (recognising international evidence that exposure to family violence very often leads to poor long term development outcomes for children);
- where a child (whether a client or otherwise) presents to Femili PNG in a state of neglect, malnutrition, sick or traumatised;

- ✓ where a child is pregnant;
- ✓ where a child has a sexually transmitted disease;
- ✓ where a child is a perpetrator of abuse or sexual violence;
- ✓ where a child has a disability (recognising evidence that disabled children, and especially girls, are among the most vulnerable to violence/sexual abuse).

### **3.3 Child Protection Risks**

There are a number of potential child protection risks arising in the course of Femili PNG's work. Femili PNG is committed to identifying and managing these risks. They include:

- ✓ exposure to Femili PNG staff or representatives who may harm the child/ren in some way;
- ✓ exposure to visitors to Femili PNG who may harm the child/ren in some way;
- ✓ exposure to transport providers, security providers, accommodation providers, police, hospital or other staff who may harm child/ren in some way;
- ✓ Femili PNG case management or related decision-making may unintentionally place children in harm's way;
- ✓ Femili PNG may work with partner organisations who place children in harm's way, including through decision-making over which Femili PNG may have no control (for example, decisions by police, government, courts and suchlike);
- ✓ Femili PNG may work with organisations based in other provinces that are not very familiar to Femili PNG, who may place children at risk of harm in some way; and
- ✓ and other risks, seen and unforeseen.

Femili PNG is committed to identifying, together with its Board, Executive Management Committee, staff and stakeholders, the risks facing children and ways to effectively mitigate them in accordance with this Policy and other relevant Femili PNG policies and risk management tools.

## **4.0 POLICY STATEMENTS**

- 4.1 Femili PNG has zero tolerance for child abuse.
- 4.2 Femili PNG is committed to promoting the health, safety and wellbeing of all children and protecting them from exploitation and abuse. We are committed to the cultural safety of children and to providing a safe environment for children, including children living with a disability.
- 4.3 Femili PNG recognises that perpetration of harm against children is more likely to occur where an organisation lacks the culture, ethics, leadership, policies and professionalism to promote child protection.
- 4.4 All children, regardless of their gender, race, religious beliefs, age, disability, sexual orientation, or family or social background, have equal rights to protection from abuse.
- 4.5 All Femili PNG staff and representatives are responsible for the care and protection of children and are obligated to immediately report information about any suspected, alleged or known harm to children. (See Section 6.0 Child Protection Reporting Procedures).
- 4.6 In line with international evidence that children are often reluctant to disclose abuse and rarely falsely claim abuse, Femili PNG takes the position that children are to be believed when disclosing abuse.

- 4.7 Femili PNG's staff and representatives are all responsible for ensuring our child protection approach is understood and integrated into all areas of our work and our organisation's ethics and culture.

## **5.0 IMPLEMENTATION**

The following mechanisms will be used to implement Femili PNG's *Lukautim Pikinini Gut Long Birua* – Child Protection Policy.

### **5.1 Child Protection Code of Conduct**

The Child Protection Code of Conduct clearly outlines acceptable and unacceptable standards of behaviour regarding interactions with children. It applies to all Femili PNG staff and representatives and provides them with clear guidance on how to minimise risks to children, including when working with other organisations. All Femili PNG staff and representatives must demonstrate their commitment to this Code of Conduct by signing it, indicating they will abide this Code at all times. The CEO/SSW is responsible for ensuring that a signed copy of the Code of Conduct is held on file for all Femili PNG staff and representatives.

### **5.2 Risk Management**

Whilst Femili PNG is aware it cannot control all risks of child abuse and exploitation, it commits to ensuring the risks of child abuse and exploitation are identified, monitored and reasonably mitigated against. The Board, Executive Management Committee and staff are critically important to effective risk management and will specifically discuss child protection in the course of developing and implementing risk management plans. Femili PNG's full suite of risk management tools and skills shall be utilised to mitigate child protection risks. Separate child protection risk assessments are maintained for the Bel isi PNG Initiative, and for Femili PNG's national operations (Lae and Goroka).

Femili PNG identifies child protection risks and manages these risks to children in all our activities reduce the risk of harm. This is achieved by examining each category of activity and its potential impact on children. Activities and work direct with children are automatically considered as higher risk and therefore require more stringent analysis and child protection risk mitigation.

Risk management is an ongoing part of everyday work, and Femili PNG works closely with staff to grow their awareness of this, and of ways to address child protection risks and report issues promptly.

With respect to case management work with children, Femili PNG's Case Management Policy and Procedure Manual specifically addresses case management work with children at risk, and upon referral of child clients, an initial needs and risk assessment is immediately undertaken by trained staff, overseen by Femili PNG's Child Protection Officer and/or senior management in high risk cases.

For the Bel isi PNG safe house, an additional set of policies and operational procedures address risks specific to this context. All staff will be trained on this Policy and regular reviews of the Policy will occur recognising the additional risks for children in residential settings.

### **5.3 Accessibility**

Femili PNG's *Lukautim Pikinini Gut Long Birua* – Child Protection Policy will be publicly available to all and accessible on our website. We will assist willing partner organisations to use the Policy to assist development of their own child protection policies.

The Code of Conduct will be posted on the wall of our office/s and copies of all child protection documentation will be provided to all staff during training and induction.

### **5.4 Training and Induction**

Femili PNG will provide specific training to all staff on child protection, and staff will be supported to ensure commitments are met. Child protection training will be arranged for Femili PNG staff on an annual basis. The Policy will also be reviewed on an annual basis to allow staff feedback to inform any policy amendments (refer to Policy Amendments in this policy). If the policy review results in no amendments, this should be noted at EMC.

New staff will be provided with a comprehensive induction on the Policy and Code of Conduct on joining the organisation.

### **5.5 Reporting Procedures**

Femili PNG's child protection reporting procedures are outlined in Section 6.0 of this document.

### **5.6 Nomination of Child Protection Delegate**

The CEO/SSW, Operations Directors and Program Manager are designated as focal points for all child protection issues, and will manage or oversee significant child protection issues. These delegates may also, as required, delegate certain specific issues and enquiries to Femili PNG's Child Protection Officers. The Child Protection Delegates are responsible for ensuring that this policy is implemented.

### **5.7 Photos, Images and Story Gathering**

Femili PNG will at all times portray children in a respectful, appropriate and consensual way. Our guidelines on the use of children's images are:

- ✓ No child client of Femili PNG or child at the Bel isi PNG safe house will have their image captured in still or film form, (except if requested by an authority for the purpose of legal action or medical evidence)
- ✓ Any other child images should be only be captured with the consent of the child/ren and parents (or teacher, if in a school setting). When asking for consent, clear details should be given as to how and where this image will be used, and the ability to retract permission at any time should be made clear.
- ✓ Children should always be portrayed 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.
- ✓ There should be no identifying information of the child used in the publication of images with their location.
- ✓ Children should be portrayed as part of their community.
- ✓ Local cultural traditions should be assessed regarding restrictions for reproducing personal images.
- ✓ Images should be an honest representation of the context and the facts.
- ✓ When sending images electronically, file labels should not reveal identifying information.
- ✓ All photographers will be screened for their suitability, including police checks where appropriate.

## **8 Recruitment**

Femili PNG undertakes a comprehensive recruitment and screening process for all staff and volunteers which aims to:

- ✓ promote and protect the safety of all children under the care of the organisation;
- ✓ identify the safest and most suitable people who share Femili PNG's values and commitment to protect children; and
- ✓ prevent a person from working at Femili PNG if they pose a risk to children.

This screening process includes:

- ✓ stating in all job advertisements that Femili PNG is committed to child protection and that recruitment and selection procedures will reflect this.
- ✓ criminal record checks, or where these are not available, the candidate must sign a written statement disclosing whether they have been charged with any child protection offences;
- ✓ verbal referee checks; and
- ✓ use of behavioural-based interview questions that probe the applicant's past behaviour relating to children in specific situations relevant to the position (these give interviewers additional information as to the applicant's suitability to work with children).

Femili PNG will not engage any person who poses an unacceptable risk to children.

All employment contracts must contain provisions for immediate dismissal for any personnel who breach the Child Protection Policy and Code of Conduct.

## **5.9 Visitors**

Femili PNG will take the following preventative measures with regard to all visitors to the case management centre in Lae and the Bel isi PNG case management centre and safe house in Port Moresby:

- ✓ verbally brief all visitors on the requirements with regard to child protection and mechanisms for reporting any suspicion or allegation of abuse;
- ✓ provide all visitors with a copy of Child Protection Policy;
- ✓ require all visitors to read and sign the Child Protection Code of Conduct; and
- ✓ ensure that visitors are accompanied by Femili PNG staff at all times while visiting Femili PNG or Femili PNG partner activities.

## **6.0 CHILD PROTECTION REPORTING PROCEDURES**

Femili PNG's child protection reporting procedures are guided by the following:

- ✓ swift and appropriate action where there is reasonable grounds for belief of child abuse;
- ✓ reporting and notification obligations under PNG law;
- ✓ duty of care obligations;
- ✓ client confidentiality obligations;
- ✓ child and client safety; and
- ✓ employees and other relevant individuals' legal rights.

### **6.1 Responsibility to Report**

**All** Femili PNG staff and representatives are responsible to immediately report any suspicion, allegation or witnessing of a child protection incident.

A child protection incident is:

- (a) any form of child abuse as defined in section 1.3 Definitions; **or**
- (b) any breach of this Policy or the Femili PNG Child Protection Code of Conduct,

and, that is:

- (c) committed by a Femili staff or representative; **or**
- (d) where Femili PNG has a duty of care towards the child.

It is **not** the role of Femili PNG staff/representatives to **prove** that a child protection incident has occurred, but to report any knowledge or concern, founded or otherwise, that they may have of a child protection incident occurring.

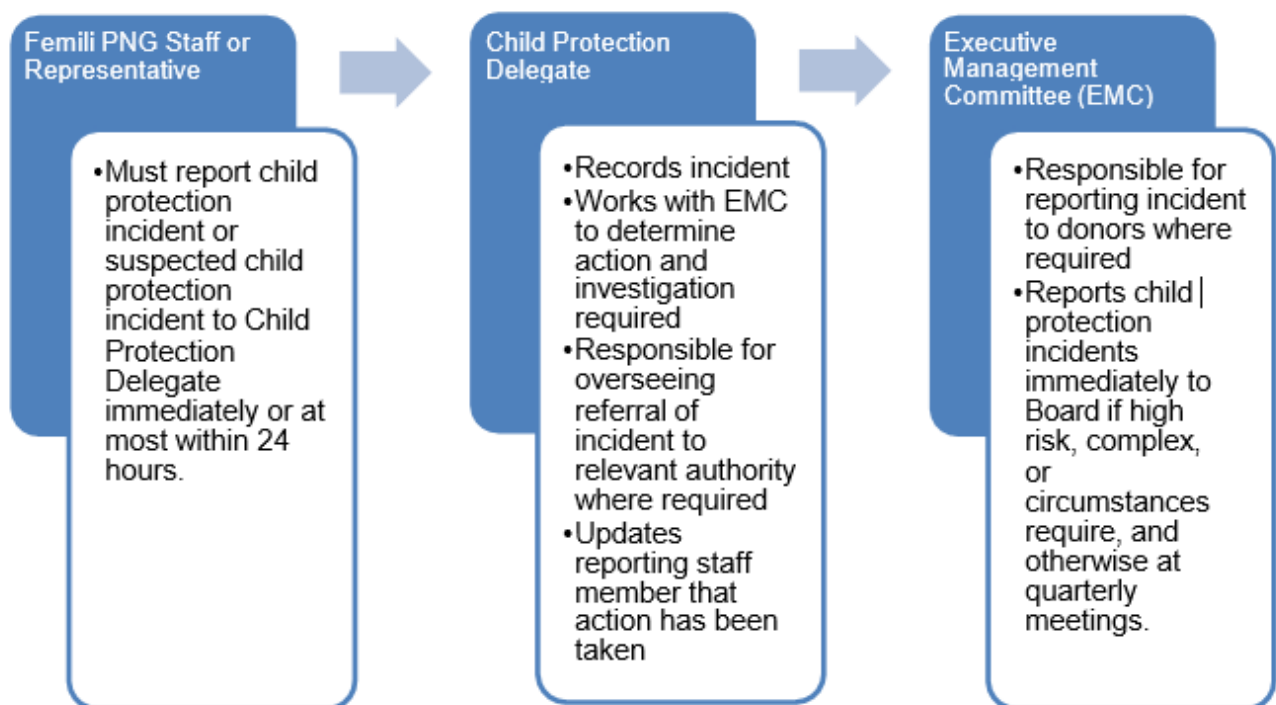
## 6.2 Reporting Procedure and Flow Chart

Femili PNG staff and representatives must report the child protection incident (or suspected child protection incident) to a Child Protection Delegate *immediately*, or within 24 hours of the incident/receipt of information if they are in a location or situation which prevents them from reporting immediately.

Femili PNG has four Child Protection Delegates, the CEO/SSW, the two Operations Directors (Lae and Port Moresby), and the Program Manager (Goroka).

The report will generally be made verbally in the first instance, but must be followed up by a detailed written account of the incident. Whether reporting verbally or in writing, it should be done confidentially.

The below flow-chart depicts the reporting process and the responsibility of each party.



If you are still not sure what to do in the case of a suspected child protection incident or have any questions or concerns, discuss with a Femili PNG Child Protection Delegate (CEO/SSW or Operations Directors). All reports made in good faith will be viewed as being made in the best interest of the child regardless of the outcome of the investigation.

If the situation occurs where a Child Protection Delegate is suspected of involvement in the child protection incident, or if the person having the suspicion does not believe that the matter is being appropriately addressed or dealt with, the matter should be escalated to the Chair of Femili PNG via email marked confidential to [Stephen.Howes@anu.edu.au](mailto:Stephen.Howes@anu.edu.au).

### **6.3 Reporting by other parties**

If any other party (including partners, clients and service providers) wishes to report a child protection incident relating to Femili PNG's operations, they can do so by emailing the Executive Management Committee on [info@femilipng.org](mailto:info@femilipng.org). If they prefer, they can contact the Chair: [stephen.howes@anu.edu.au](mailto:stephen.howes@anu.edu.au)

Femili PNG receives funding through various streams, and complies with the DFAT Child Protection 'comprehensive' standards. Child protection complaints in relation to Femili PNG's operations can be made to the appropriate funder/partner as per the funding/partnership agreement.

Information on how to make a child protection complaint if available on our website [femilipng.org/about/complaints/child-protection](http://femilipng.org/about/complaints/child-protection).

### **6.4 Confidentiality and Safety**

Confidentiality (i.e. protection of the identities of the reporter, victim and perpetrator) should be ensured to the fullest degree possible under the circumstances. All details of the reporting and investigation process are kept as confidential as possible within the requirements of the law, and only shared with relevant persons (this could include local authorities). Provisions will be made for the protection of the person reporting an issue or concern if they have a genuine fear for their physical safety. Likewise, Femili PNG will ensure that any staff member or representative who is accused of breaching this policy is treated justly and is safe (until the point their engagement as a Femili PNG staff member or representative ends). The child's safety is the paramount consideration for Femili PNG and provision for the child's safety and wellbeing will be prioritised.

For more information, refer to Femili PNG's Privacy policy.

### **6.5 Investigation**

It is the role of the Child Protection Delegate/s to confidentially investigate each report as part of a process to:

- ✓ understand the circumstances surrounding the alleged child protection incident;
- ✓ determine what actions were taken by Femili PNG staff and representatives involved in the incident; and
- ✓ to address the needs of the survivor (child).

Given the importance of child protection to Femili PNG's core work and organisational ethics and culture, **all** child protection incidents will be formally investigated and the investigation will be directly overseen by the EMC.

Child protection incidents allegedly committed by Femili PNG staff or representatives will be investigated in accordance 'Investigating Misconduct' in the Femili PNG HR Policy Manual: Investigating Misconduct. The staff or representative implicated in the child protection incident may be suspended while the investigation is taking place as per the HR Policy Manual. Disciplinary action will be taken in accordance with the 'Disciplinary Procedure' outlined in the HR Policy Manual:

The appropriate and necessary actions taken as a result of each investigation will be determined by the EMC on a case-by-case basis. The EMC will seek legal advice, to ensure adherence to PNG civil and criminal laws, as necessary.

## **6.6 Donor and Partner Notification**

Femili PNG has an obligation to report relevant child protection incidents involving its staff and representatives to its donors and partners.

Under our funding and/or agreements with partners and/or funders, Femili PNG must immediately advise in writing if the Organisation, its Personnel or representatives are accused or charged with, suspected of, or convicted of, criminal offences relating to child abuse or exploitation immediately.

The safety of the child involved in the reported child protection incident is a priority. A report will also be made to Welfare services within 24 hours to ensure the safety of the child and that the child is protected.

## **7.0 MONITORING AND REVIEW**

Monitoring of the application of this Policy is the responsibility of all staff, led by the CEO/SSW and overseen by Femili PNG's Executive Management Committee, and at the highest level its Board.

Reviews of this policy will be conducted in light of and informed by any reported child protection incident(s) to assist assessment of whether this Policy and the Child Protection Code of Conduct require modification to enable better protection of the children who engage with the organisation, its staff and representatives.

## **8.0 RELATED DOCUMENTS**

- ✓ Femili PNG Case Management Policy and Procedure Manual
- ✓ Femili PNG Child Protection Code of Conduct
- ✓ Femili PNG HR Policy Manual
- ✓ Femili PNG Risk Management Framework
- ✓ Femili PNG Child Protection Risk Assessments
- ✓ Femili PNG Safe House Policy and Procedure Manual
- ✓ Femili PNG Privacy Policy

## Appendix A – Schedule of Changes

Date	Comments
November 2018	Updated to reflect Femili PNG's operation of the Bel isi PNG safe house and case management centre in Port Moresby. Changed 'Management Committee' to 'Board' and 'Operations Manager' to 'Operations Directors'.
July 2019	Updated to extend this policy to apply to partners, where appropriate.
February 2020	Updated to Provide avenues for other parties to report a child protection incident relating to Femili PNG's operations to Femili PNG and DFAT. Document the working practice of mandatorily reporting child protection incidents to Welfare.
May 2021	Updated to encompass operations in Goroka, child protection risk assessments and annual policy review as part of training.
May 2022	Updated to remove references to Friends of Femili PNG
May 2026	<ul style="list-style-type: none"> <li>• Reinforced the requirement of 'immediate' reporting to FPNG and the appropriate funder in the Policy</li> <li>• Made reference to the <a href="http://femilipng.org/about/complaints/child-protection/">femilipng.org/about/complaints/child-protection/</a> page on the FPNG website</li> <li>• Adjusted language around the purpose of the Policy and FPNGs commitment to be 'prevent, mitigate and respond to child exploitation, abuse and harm'</li> <li>• Adjusted language around staff and representative's responsibilities for clarification – now says 'preventing, reporting and responding...'</li> <li>• Added 'if the policy review results in no amendments, this should be noted at EMC' under 5.4 Training and Induction'</li> <li>• Added Program Manager (Goroka) under Child Protection Delegate</li> <li>• Added 'all reports made in good faith will be viewed as being made in the best interest of the child regardless of the outcome of the investigation'</li> <li>• Simplified language around reporting to other parties, instead of naming the funder it now refers to 'the appropriate funder/partner as per the funding/partnership agreement'</li> <li>• Added a reference to the Femili PNG Privacy Policy</li> <li>• Removed reference to chapters in the HR manual as these were outdated and so that changes to the HR manual does not affect this policy</li> </ul>

