



Child Protection Policy

November 2018 (Updated February 2021)

Our Commitment to Child Safety:

Playground Ideas is committed to the protection of all children from abuse and exploitation. We want children to be safe, happy and empowered. We support and respect all children, as well as our staff and volunteers. We are committed to the safety, participation and empowerment of all children and believe that all children have the right to protection from abuse and exploitation, regardless of their gender, race, religious or political beliefs, age, physical or mental health, sexual orientation, family and social background and culture, economic status or criminal background.

We have zero tolerance of child abuse, and all allegations and safety concerns will be treated very seriously and consistently with our robust policies and procedures.

We have legal and moral obligations to contact authorities when we are worried about a child's safety, which we follow rigorously.

We are committed to the cultural safety of Aboriginal children, the cultural safety of children from culturally and/or linguistically diverse backgrounds, and to providing a safe and inclusive environment for children with a disability.

Our organisation is committed to preventing child abuse and identifying risks early and removing or reducing these risks.

Purpose of the Policy:

The purpose of this policy is to protect children from all forms of abuse and exploitation, in all of Playground Ideas' activities and projects.

The policy sets out general principles, guidelines and obligations to assist all Playground Ideas stakeholders to understand and implement their role and responsibilities in protecting children.

Scope of the policy:

The Policy applies to:

- Personnel (paid personnel, volunteers, consultants, contractors) and;
- Associates (Global Play Alliance members, donors, board members, partners, visitors)

Guiding Principles:

Zero tolerance of child exploitation and abuse

Playground Ideas has a zero-tolerance approach to child exploitation and abuse. Child exploitation and abuse will attract criminal, civil and disciplinary sanctions.

Risk management approach

Playground Ideas will proactively work to provide safe and protective programs, activities and environments for the children we and our partners engage with as part of our work. We will do this by identifying, mitigating, managing and reducing any risk to children that may be associated with or impacted by the organisational functions, activities and programs of Playground Ideas.

Sharing responsibility for child protection

Child Protection is a shared responsibility. Playground Ideas expects that all personnel and associates will play a role in keeping children safe in Playground Ideas programs and activities.

Recognition of the best interests of the child

All decisions relating to the protection of children will be made based on the principles of the best interest of the child.

Inclusivity

Playground Ideas commits to ensuring that its programs, community consultations and projects with partner organisations, ensures wherever possible that children are included and consulted with, and not discriminated against regardless of gender, race, religious or political beliefs, age, physical or mental health, sexual orientation, family and social background and culture, economic status or criminal background.

Procedural fairness

Playground Ideas will follow and apply procedural fairness to all concerned when responding to reports or allegations of child abuse.

Definitions:

A child - any person under the age of 18 years

Child Protection - is the term used to describe the responsibilities and activities undertaken to prevent or stop children being abused or maltreated.

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 family violence. Abuse can be inflicted on a child by both men and women, as well as by young people themselves and in some cases; professionals and other adults working with children in a position of trust also abuse children.

Physical abuse - occurs when a person purposefully injures or threatens to injure a child or young person. This may take the form of slapping, punching, shaking, kicking, burning, shoving or grabbing. The injury may take the form of bruises, cuts, burns or fractures.

Emotional abuse - occurs when a child is repeatedly rejected or frightened by threats. This may involve name-calling, being put down or continual coldness from parent or caregiver; to the extent that it affects the child's physical and emotional growth.

Neglect- is the 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.

Sexual abuse - Occurs when a child or young person is used by an older or bigger child, adolescent or adult for his or her own sexual stimulation or gratification - regardless of the age of majority or age of consent locally. These can be contact or non-contact acts and includes exposing a child to or involving a child in pornography.

Exploitation - Commercial or other exploitation of a child refers to the use of the child in work or other activities for the benefit of others that are to the detriment of the child's physical and mental health, education, or moral and social-emotional development. It includes, but is not limited to one or more of the following:

- Committing or coercing another person to commit an act or acts of abuse against a child
- Possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material
- Committing or coercing another person to commit an act or acts of grooming or online grooming
- Using a minor for profit, labour, sexual gratification, or some other personal or financial advantage

Child Protection Code of Conduct

Playground Ideas has developed a Child Protection Code of Conduct to provide clear guidance to staff, consultants, contractors, volunteers and partners about ways to minimise risk to children and make clear the standards of behaviour and practice required of them at all times when they are in contact with children. These behaviours are not intended to interfere with normal family interactions.

All Playground Ideas personnel and associates are required to read and sign the Child Protection Code of Conduct, which is located at (Annex A).

Signed copies of the Code of Conduct will be kept by Playground Ideas in a personnel file and a copy will be provided to the personnel or associate.

Child Safe Recruitment & Selection:

Our organisation has robust human resources and recruitment practices for all personnel. We use child safe recruitment, selection and screening practices that aim to recruit the safest and most suitable people to work in our programs.

- Our child safe practices include:
- Assessing all positions for the level for risk in relation to contact with children;
- Conducting at least two verbal referee checks that involve discussing child protection with referees;
- Undertaking criminal history checks¹ for each country the individual has lived for 12 months or longer over the past 5 years, and for the individual's country of citizenship. Playground Ideas will review these checks when personnel have a change in circumstances;
- Requiring statutory declarations where criminal history checks are not available;
- Requiring applicants to disclose whether they have been charged with child abuse/exploitation offences;
- Requiring applicants to read and sign onto the Playground Ideas Child Protection Code of Conduct;

Including questions on child protection during interviews for positions working with children;

Playground Ideas will not permit any person to work or have contact with children if they pose an unacceptable risk to children's safety or wellbeing.

¹ In general, to pass this type of check a criminal history check of the person must not reveal any relevant offences (e.g. serious sexual, violent or drug offences) or adverse professional conduct reports.

Playground Ideas employment contracts include a provision for suspension or transfer to other duties of any employee who is under investigation and provisions to dismiss an employee after an investigation

Reporting & Responding to Child Protection Concerns:

It is mandatory for all Playground Ideas personnel and associates to report any witnessed, suspected or alleged incidents of child abuse or any breach of the Child Protection Policy or Child Protection Code of Conduct.

What should be reported?

Any disclosure, concern or allegation regarding the safety, abuse or exploitation of a child by Playground Ideas personnel or associates (this includes actual, suspected, or risk of abuse or harm to a child).

Any observation or concerning behaviour exhibited by Playground Ideas personnel or associates that breaches the Playground Ideas Child Protection Code of Conduct.

If you have a concern regarding child abuse by an external person (not Playground Ideas personnel or associates), report it to the authorities in your location.

When to report?

All child protection concerns must be reported immediately or within 24 hours.

How to report?

Child protection reports should be made verbally or by completing the Playground Ideas-Child Protection Incident Reporting Form. See Annex B.

Who to report to?

All child protection reports should be made to:

1. Laurette Hargreaves, Head of Marketing and Partnerships,
Email: laurette@playgroundideas.org Mobile: 0408 003 099

Alternatively, reports can be made to:

2. Marcus Veerman, CEO, Playground Ideas
Email: marcus@playgroundideas.org Mobile: 0432 738 719

If you believe a child is at immediate risk of abuse phone 000 or the emergency call service in your location before making a report to Playground Ideas.

Anonymous reports can be made via telephone using the above phone numbers.

What will happen next?

The Operations and Community Engagement Manager in consultation with the CEO will discuss the allegations and then decide upon the next step. This will involve one or more of the following steps:

- Interviewing the person/persons who made the allegations and/or other witnesses to gather more information with which to make a decision about the allegation;
- Reporting to local police and or child protection authority when it is suspected or becomes clear that a crime has been committed;
- Reporting to local child protection services as necessary;
- Referring the child to local support services if necessary;
- Handling the concern internally if it is not a criminal matter;
- Providing support to all stakeholders (including reporter) as necessary;
- No further action taken.

All reports will be handled professionally, confidentially and expediently.

Playground Ideas will treat all concerns raised seriously and ensure that all parties will be treated fairly and the principles of natural justice will be a prime consideration.

Each report will be investigated on a case by case basis. Responses will reflect the nature of the allegation. Not all responses will involve reporting to authorities or termination.

The rights and welfare of the child is of prime importance. Every effort will be made to protect the rights and safety of the child throughout the investigation.

All reports made in good faith will be viewed as being made in the best interests of the child regardless of the outcomes of any investigation. Playground Ideas will ensure that the interests of anyone reporting child abuse in good faith are protected.

Reports involving any suspected or alleged instances of child abuse, exploitation, harm or child protection policy non-compliance by anyone working on a DFAT funded project will be documented in a DFAT Child Incident Notification Form and reported by Playground Ideas to DFAT's Conduct and Ethics Unit.

Confidentiality

Confidentiality is a key principle of reporting and managing child protection concerns. All information regarding a child protection concern must only be shared with the designated individuals listed above. The names of people involved and the details of the report will remain confidential. Information will only be released on a “need to know” basis or when required by law or when a report to police or child protection support services is made.

Disciplinary action

A breach of or failure to comply with the Policy or the Child Protection Code of Conduct will result in:

- Implementation of disciplinary procedures which may result in disciplinary action up to and including:
- In the case of a paid employee – dismissal of the employee;
- In the case of a volunteer - termination of the services of the volunteer;
- In the case of a Managing Board Member or a Board Committee Member - removal from office;
- In the case of a contractor who is a sole trader – termination of contract;
- In the case of personnel employed by a contractor or a subcontractor – a direction to the contractor requiring termination of the services of the person concerned and/or termination of the contract of the contractor or subcontractor;
- In the case of a visitor – a direction to leave the relevant activity;
- In the case of a partner – up to and including termination of all relations including contractual and partnership agreements with Playground Ideas

Someone under investigation may be transferred to other duties, be suspended, or following an investigation have their employment terminated. In addition, depending on the nature of the allegation, cases may result in legal action; and/or criminal investigation and prosecution.

Disciplinary action will be taken against any person found to:

- Have failed to report a child protection concern
- Have intentionally made a false allegation

Risk Assessment

Playground Ideas acknowledges that there are a number of potential risks to children in the delivery of our programs. Accordingly, we proactively assess and manage risks to children in order to reduce the risk of harm. This is achieved by examining each activity and program and its potential impact on children. Activities and programs that involve direct work with children are considered a higher risk, and therefore require more stringent child protection procedures.

Playground Ideas conducts a child protection risk assessment on every activity and project involving and affecting children prior to commencement. Mitigation strategies are put in place for any risk identified and these (and any emerging risks) are actively monitored throughout the activity/program cycle.

At times, our programs may include the participation of vulnerable groups of children and youth, including but not limited to, children and youth from disaster affected communities and children and youth living in refugee camps. We commit to designing, implementing and monitoring programs that are informed by a thorough risk assessment of the heightened risks posed to children and youth in these contexts.

Personnel and associates (as relevant) are trained in child protection and risk assessment. They are expected to be continually aware of potential risks to children and youth as well as to be actively minimising opportunities and situations where children and youth can be harmed.

Working with Partners

Playground Ideas determines whether partners are a child safe organisation by including child protection in our partner appraisal process. We commit to strengthening our partner's ability to protect children and youth in our programs by investing in targeted capacity building, training and awareness raising on child protection.

If a partner does not have their own Child Protection Policy, Code of Conduct or procedures in place that meet the standards set out in the Playground Ideas Child Protection Policy they will be required to sign and abide by the Playground Ideas Child Protection Policy, Code of Conduct and any relevant procedures.

Playground Ideas works with partners to undertake a child protection risk assessment for all programs and activities involving or affecting children and this is monitored throughout the life of the project cycle.

Playground Ideas includes clauses on child protection standards and agreed child

protection measures in all partnership agreements and contracts.

Playground Ideas actively monitors the implementation of agreed child protection measures and external compliance obligations with our partners on an ongoing basis via project reports, project visits or annual audits.

Training

Our organisation is committed to regularly training and educating our personnel and associates (as relevant) on child abuse risks. All Playground Ideas personnel will be inducted to this Policy and the Child Protection Code of Conduct. All personnel who have contact with children will undergo an additional child protection briefing and regular refresher training.

All media or others visiting Playground Ideas facilitated programs in the field will be expected to undergo a child protection briefing prior to their visit.

Playground Ideas maintains a register of all persons who have been trained.

Marketing & Communications

Playground Ideas makes every effort to ensure the way we represent children in our marketing materials and media is done in a way that keeps them safe and upholds their rights and personal dignity

Using children's images and personal information can help us to share their stories. However, we understand that this needs to be done with care so as not to place children at risk of harm. Accordingly, we have developed a set of guidelines to help to ensure that our research, marketing and communications activities do not place children at risk. See Annex C.

Policy Review:

This Child Protection Policy will be reviewed every 3 years unless required earlier. The review will be undertaken by the Operations Manager.

ANNEX A: CHILD PROTECTION CODE OF CONDUCT

This Child Protection Code of Conduct aims to keep children safe and protect Playground Ideas Representatives from misunderstandings by providing clear behavioural guidelines and expectations that assist to establish and maintain clear professional boundaries when working with children.

I agree that while working with or on activities associated with Playground Ideas I will:

- Treat all children everywhere with respect, regardless of ethnicity, gender, religion, disability, social status or political persuasion;
- Ensure that as much as possible, children of different genders, ethnicities, abilities and religions are engaged and involved during community consultations;
- Refrain from using language or behaviour towards children that is demeaning, harassing, culturally inappropriate or sexually provocative;
- Never engage children under the age of 18 in any form of sexual intercourse or sexual activity, including paying for sexual services;
- Interact with children in such a way so as to facilitate transparency and accountability to other adults;
- Wherever possible, ensure that another adult is present when working near children;
- Appoint teams rather than individuals working alone with unaccompanied children;
- Not invite unaccompanied children into private residences, unless they are at immediate risk of injury or in physical danger
- Not sleep close to unsupervised children unless absolutely necessary, in which case the supervisor's permission must be obtained, and ensuring that another adult is present if possible (noting that this does not apply to an individual's own children);
- Refrain from physical punishment or discipline of children;
- Not hire children for domestic tasks or other labour inappropriate for their developmental stage, which places them at risk of injury or prevents them from accessing education;
- Comply with all relevant Australian and local legislation, including labour laws in relation to child labour;
- Immediately disclose all charges, convictions and other outcomes of an offence that relates to child exploitation and abuse, including those under traditional law, which occurred before or occurs during association with Playground Ideas
- Be aware of behaviour and avoid actions or behaviours that could be perceived

by others as child exploitation and abuse

- Immediately report any concerns/allegations of child exploitation and abuse and policy non-compliance in accordance with appropriate procedures;
- Never use technology, including computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material through any medium
- Not seek to or make contact with any child or youth, outside Playground Ideas program times, inclusive of direct contact or any contact via social media platforms.

When photographing or filming a child or using children's images or personal information for work purposes I will:

- Abide by the Playground Ideas *Child Protection Guidelines for Marketing and Communications*
- Comply with local traditions and cultural expectations when photographing/filming /interviewing children;
- Obtain informed consent from the child and parent or guardian of the child before photographing, filming or documenting personal details of a child. This includes providing an explanation of how the photograph or film will be used.
- Ensure all images and communications present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in sexually-suggestive poses;
- Not use images or information (file labels, metadata, text) in such a way as to reveal identifying information about the child when sending images/information electronically or publishing images/information in any form;
- Ensure all images are honest representations of the context and facts.

Please sign here:

I, _____(insert name) acknowledge that I have read, understand and agree to abide by the Playground Ideas Child Protection Policy and Code of Conduct.

I understand that Playground Ideas reserves the right to terminate my position and/or take legal action against me if I breach the Child Protection Code of Conduct

Date: _____

Position/relationship with Playground Ideas: _____

ANNEX B: CHILD PROTECTION INCIDENT REPORTING FORM

Please complete this form to document and report any child protection concerns, a breach or potential breach of the Child Protection 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.

Today's date: _____

Reporters name: _____

Position or relationship with Playground Ideas: _____

Contact number: _____

Contact email: _____

DETAILS OF CONCERN / SUSPICION / INCIDENT:

Please fill out as many of the sections as possible, with as much detail as you can.

1) Describe what happened: time / date/s / names of persons involved (including the child/ren, alleged perpetrator, any witnesses)/ location of incident/ behaviour or signs observed / any other details that outlines your concern.

2) Provide details of any conversation with the child. Please describe exactly what the child said with his/her own words:

3) Are there any immediate safety concerns for the child?

Yes No (Please circle)

If so, what are they?

4) Does the child have any immediate medical or other needs?

Yes No (Please circle)

If so, what are they?

5) Have you contacted anyone about this concern?

Yes No (Please circle)

If so, who have you contacted?

6) What other steps have you taken? (i.e. responded to immediate medical needs)

Please sign and date this report

Signed:

Date:

OFFICE USE ONLY

Name of person who received Incident Report: _____

Action taken:

Please document all discussions, actions, times and dates in the decisions taken in the management report until such time as it is finalized or closed. Please add additional sheets for reporting as needed.

ANNEX C: MARKETING AND COMMUNICATIONS CHILD PROTECTION GUIDELINES

The following guidelines should be followed by Playground Ideas personnel and associates when interacting with children for the purpose of gathering and using research, marketing and communications material to promote the work of Playground Ideas.

- A risk assessment of any activity that involves the use of children's images should be undertaken and preventative measures should be put in place accordingly. • Informed consent is required for all imagery and personal information of a child that is taken and used by Playground Ideas (see informed consent guidelines over-page)
- Do not use images or information (file labels, metadata, text) in such a way as to reveal identifying information about the child when sending images/information electronically or publishing images/information in any form.
- Personal or physical information that could be used to identify the location of a child/children within a country should not be used on a website or in any other form of communication about a child. Do not use community names or locality maps of specific communities. Do not use a child's surname or school name. Only use a child's first name.

For example:

1. Fatima (real name) from (district or state name rather than village name) participating in a Playground Ideas community consultation
 2. Child from (district or state name rather than village name) participating in a Playground Ideas program
 3. Rajini (with disclaimer stating name has been changed for privacy or CP reasons) from (district or state name rather than village name) participating in Playground Ideas program
- Always change a child's name in situations where there may be a risk of compromising the child's safety.
 - If someone does not want their name used this must be respected. • Consider and document child protection risks when developing or adding content to any website or including content in public marketing or communications materials
 - Special consideration to the heightened risks of especially vulnerable children should be given and appropriate mitigation measures put in place to avoid placing such children at increased risk.
 - Show children with their support networks – parents/teachers/class etc.to avoid increasing their vulnerability.
 - Geo tagging functions on cameras and mobile phones should be turned off when taking photographs or video footage.

- Local cultural traditions should be assessed regarding restrictions for reproducing personal images. Prior to taking photographs, assess the local cultural/social traditions regarding taking photographs/ interviewing children. These could include presenting people engaging in particular activities or grouped in certain ways. Take the time to consult with children, community members or adult program participants. Ask them whether there are boundaries you should avoid.
- Ensure all images and communications present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in sexually-suggestive poses.

Informed Consent

Informed consent is required for all imagery and personal information of a child that is taken and used by Playground Ideas. This includes providing an explanation of how the photograph or film will be used.

Informed consent means that the child and their parent/legal guardian understand and acknowledge what they are giving consent for.

In ALL circumstances a child's parent or legal guardian must give their informed consent.

Whilst it is good practice to get informed consent from a child, in some circumstances (for example, where a child is very young) this may not be possible.

Informed consent should be documented via the Playground Ideas informed consent form or via video footage of the informed consent process.

Consent forms can be distributed to school / community leaders to facilitate getting consent, and specific times assigned for taking photos when those interested attend.

All consent forms must be presented or explained in the local language spoken by the subject.

If it is not possible to gain written consent, obtain verbal consent by filming someone explaining in the local language what the image or video will be used for, the persons answer and the date and names of those involved.

As part of obtaining informed consent you must:

- Explain the reasons for taking photographs, film or information and where the content will be used.
- To help people parents/legal guardians understand the risks of their child's image

being published on the Internet, explain that the image/words of their child may be on the internet and that they will be able to be seen /read by anyone in the world at anytime.

- Ask if they have any concerns about the use of images or information
- Explain they can withdraw their consent to Playground Ideas to collect or use their information at any time by contacting one of the project staff, or emailing info@playgroundideas.org and that this will not have any negative impact on them or their participation in the program.

Even if a child and their parent have previously given consent, if they do not want to have their photograph taken or used this must be respected at all times.

If a subject seems confused or uncomfortable, do not take the photograph or shoot the footage until this has been resolved. It is very important to allow discussion and question time so that potential subjects are making a real informed decision and do not feel pressure to say 'Yes'.

Ensure that informed consent forms/ videos are filed securely.

Filming and interviewing Guidelines

When making a video, film or collecting information from a child all of the above mentioned general guidelines apply. In addition to these, there are some extra guidelines to follow.

- Check with field staff, parents/legal guardians if there is anything that should not be raised or discussed. Be sure to avoid any topic that would be known to cause distress or embarrassment.
- Inform children and their parents/ legal guardians of:
 - a. The purpose of the film/ consultation/research and where it will be shown/ how it will be used,
 - b. What to expect during filming/consultation or interview, who will be involved/present, what will the child be required/asked to do etc.
 - c. What types of questions/topics will be covered/discussed in interviews/during filming,
 - d. What they can do if they do not feel comfortable answering any questions

Explain that, if they so wish, the child has the right to refuse to comment or have their story told on their behalf and/or have their picture taken without any negative impact/outcome;

- Explain to the child (and parent/legal guardian) that they can stop participating or ask for a break at any time. (Make sure you plan for and schedule in breaks as appropriate to the age of the child/children);
- If the child is reluctant to answer or is becoming distressed, don't push them, just move on to another question;
- Make time to get to know the child and their family, build rapport and put everyone at ease before filming begins. It may be necessary to do this each time you start filming if you are filming over a number of days;
- Never be alone with a child when filming/ consulting or interviewing; • Make sure the filming/ consultation, interview takes place in a child friendly environment/ environment where the child feels safe and comfortable; • Entering someone's house or dwelling without seeking permission is not acceptable;
- Be mindful that a child is likely to be excited (or afraid) at the sight of video cameras (depending on their age and experience);
- Children should never be removed from their communities for the purpose of interviewing, filming or photography;
- When interviewing children, the interviewer should sit or stand at the same height as the child and not 'talk down', either literally or metaphorically; • Adopt a calm, friendly and neutral voice;
- The need to get information or footage should never be prioritized over a child's welfare or safety.



PHOTOGRAPHY CONSENT FORM

I give my consent to Playground Ideas to film, photograph, tape and/or collect information about me / my child.

Child's name: _____

I understand that this information may be used in communications, media, publications, on social media or in public awareness activities to promote Playground Ideas work.

- I have been shown an example of how my / my child's information may be used by Playground Ideas.
- I understand that information which identifies my child's surname or location will not be used by Playground Ideas.
- I have had the opportunity to discuss if I have any concerns about Playground Ideas taking or using my / my child's image or information publicly.
- I understand that I / my child can withdraw from the activity or request the withdrawal of future appearances on any publicity materials if a concern arise.
- I understand that Playground Ideas has a complaints procedure that I can use if my child or I have any concerns about child protection or other issues during the above-mentioned program. I have been given the contact details of the relevant staff if I have a concern. I understand that if I / my child raises a concern, it will not have a negative effect on me or my child or their participation in the program.

Parent /Guardian (required)

Name and Relationship to Child: _____

Signature or Mark: _____

Date: _____

Child or Young Person (under 18 years old - optional)

Name and Age: _____

Signature or Mark: _____

Date: _____