

ID CHILD PROTECTION PROCEDURE

Purpose

To provide guidance and outline obligations of all International Development personnel¹, relating to child protection, safety, exploitation and abuse.

Scope

All projects under contract and all personnel engaged by Cardno, including downstream partners.

Parent Policy

ID Safeguards Policy

Procedure

1 What is required?

Protection of children is of the utmost importance at all times. Cardno is committed to protecting the rights of children; safeguarding their welfare; and, adopting a zero tolerance approach to exploitation or abuse. The Cardno approach entails Prevent; Report; Protection and Support; Respond; Reflect and Learn.

All personnel engaged with Cardno are required to have an awareness of child protection matters, read, sign and commit to the Cardno [Child Protection Code of Conduct](#), and immediately report any child protection matters. Child protection is both an individual and shared responsibility of all adults and underpinned by comprehensive legal obligations.

For the purpose of this procedure a child is any person below 18 years of age.

In some contexts, the definition of youth or child may vary. For Cardno, the Child Protection Procedure must be applied based on the definition of a child being recognised as a person under the age of 18 years. Safeguards may be further adapted for local contexts and local use, but must not be less stringent than this procedure. See also Cardno's Preventing Sexual Exploitation, Assessment, and Abuse procedure.

A full list of definitions and terms relevant to this procedure are listed in Annex 1.

2 Responsibilities

All personnel

- > Be aware of child protection matters, commit to the Cardno Child Protection Policy and Procedure, sign the Cardno [Child Protection Code of Conduct](#), and immediately report any alleged or suspected child protection matters.

Child Protection Consultant

- > Provides high-level advice to Cardno on matters pertaining to child protection policy, procedure and investigations.

Child Protection Officer

Each ID Region must designate a Child Protection Officer to:

- > Own the ID Child Protection Policy and Procedure, ensure they are current, and socialise across ID through awareness, training, and audits;
- > Advise management on gaps;
- > Is the primary point of contact with the client;
- > Provides internal advisory support to staff and projects; and

¹ Personnel includes, but is not limited to: Cardno employees (national and international), Directors, senior management, advisers, grantees, associates, directors, contractors and their sub-contractors, awardees, casuals, volunteers, interns, and trustees.

- > Engages Child Protection consultant/s when needed.

Child Protection Contacts/Safeguarding focal point

Child Protection Contacts or safeguarding focal point must be designated in each ID office.

- > Understand full responsibilities of receiving and reporting child protection concerns
- > Work with the Regional Child Protection Officer and project teams to ensure socialisation and contextualised training is conducted locally.

Program Director/ Contractor Representative

- > Ensures in-country training is provided by a suitable means, based on contextualised project identified risk. Records must be retained of [attendance](#) of awareness training.
- > Ensures Child Protection [Risk Assessments](#) are conducted for all projects, and where required Activity based risk assessments.

Hiring Managers

- > Assessing and documenting the level of contact with children (and therefore the level of risk) when drafting terms of reference;
- > Follow guidance regarding recruitment Child Protection recruitment procedures (see below).

3 Awareness and Training

Personnel:

It is important for all Cardno personnel to understand that child protection is universal. This shall be articulated in project level documentation. All personnel must be made aware of Cardno's Zero Tolerance approach to child abuse and must conform to the Cardno Child Protection Procedure and [Child Protection Code of Conduct](#).

All personnel must be made aware of reporting requirements (see below). Communities involved in Cardno activities should be consulted and informed on how to raise a concern.

All staff shall complete Cardno's child protection awareness training within 45 days of their commencement and annually thereafter. This may be online or face to face.

Projects:

Nominated Child Protection/safeguarding representatives and Program Directors must ensure in-country training is provided by a suitable means.

Cardno policies must be made available at project offices and project sites, including through operational manuals, posters, flyers, training, and awareness activities with communities and beneficiaries.

Cardno policies shall be referenced in all Cardno contracts, grants, and employment agreements.

Communities involved in Cardno activities should also be informed on how to raise a concern.

Design and planning:

Projects and their activities must ensure measures are in place to protect children from harm that may arise from coming into contact with Cardno. This includes child protection risk assessments and controls, and safeguards in relation to information collection, storage, and communications.

Organisations including sub-contractors and grantees:

Cardno's due diligence requirements shall be made available during tendering and grant rounds and sub-contractor and grantee inductions must include awareness of Cardno policies.

A record of induction and, if required, remedial actions must be maintained in project files and be available for audit.

4 Risk Assessment

[Child Protection Risk Assessments](#) are required for all projects. Risk assessments are based on the level of direct engagement with children and determining what specific child protection controls are required. Where

possible Risk Assessments should be incorporated into program works planning and risk management processes, and reviewed annually by the project manager.

Child Protection Risk should be considered in the design of sub-project activities. Where “contact with children” or “working with children” is likely at the activity level then an assessment of Child Protection Risk must be completed. This can be separate to or form part of the general Activity-based Risk Assessment. Risk Assessments must also consider specific risks as they may relate to safety, labour hire practices, access to construction sites.

Child Protection Risk Assessment must be documented, submitted to the [Child Protection Officer](#), and retained on project files for audit.

5 Partner Organisations

Due diligence assessments must be completed for all proposed and contracted entities of Cardno International Development. Due diligence must assess the extent the proposed organisation complies with Cardno’s Child Protection Procedure and assess the organisations ability to manage the child protection risk of the activity (see above).

Where gaps are identified, additional controls may be required and/or additional capacity building and awareness activities may be needed.

Where Partner Organisations do not have a Child Protection Procedure, the due diligence assessment must satisfy the project that the partner organisation is able to meet Cardno standards and agree to additional controls where required (see [due diligence guidance note](#)). At a minimum, the organisation must undertake safe recruitment and screening practices, have a child protection reporting process in place, and ensure their staff understand child protection requirements. The risk assessment should be periodically reviewed over the duration of the partnership.

It is the responsibility of Cardno personnel to ensure their downstream partners understand and implement their child protection risk and have the necessary minimum standards in place.

Written agreements with partner organisations should specify child protection requirements as set out in the ID Child Protection Procedure. Partner organisations will be required to comply with the behaviour protocols outlined in the [Child Protection Code of Conduct](#).

Localised training must be provided that is appropriate to the context while also making clear Cardno standard requirements. International organisations operating locally may be best suited to provide this training.

6 Recruitment screening and on-boarding

Cardno will not employ (in any capacity, paid or unpaid) any person with a known history of abuse or violence towards children.

Hiring Managers are responsible for assessing the level of contact with children (and therefore the level of risk) when drafting terms of reference. The level of contact can be assessed using the following template:

Question	Comment
Will the position work directly with children?	
How much direct contact with children will the job involve?	
Will there be any contact with children (including via phone, letter, email, social media, etc.)	
Will the role require travel to remote areas/communicated where there will be contact with Children?	
Does the role involved working with children with disabilities or children in complex situations?	
Is the role largely unsupervised?	
Assessment:	

For all positions:

- advertisements and terms of reference contain a statement about Cardno’s commitment to child protection and safeguards;
- child protection and safeguard questions as standard in interview questionnaires and reference check questionnaires;
- proof of identification particularly for positions where there is direct working with children or a higher level of contact with children;
- employment contracts for staff / advisers contain appropriate provisions relating to Cardno’s Child Protection [Policy](#) and Child Protection Procedure; and other safeguarding policies.
- sign [Child Protection Code of Conduct](#);
- completion of criminal record checks²; where not available or in jurisdictions with no national child protection database a statutory declaration may suffice; additional screening may be required if this requirement cannot be satisfied.

Where positions are assessed as “working directly with children” or have a “high level of contact with children”, the additional measures must be undertaken in addition to the above:

- a minimum of two *documented* in-depth verbal referee checks with professional and personal associates (available from [Child Protection page](#));
- documented request for an applicant to disclose whether they have been charged with child exploitation offences, and their response;
- resolution of employment gaps;
- questions on convictions and disciplinary record;
- targeted behavioural interview questions on prior work with children / child protection issues relevant to; the role (available from [Child Protection page](#)).

Position assessments must be documented and retained on personnel files for audit purposes.

7 Appropriate use of child images and personal information

Pictures, images or other likenesses of children and / or information related to children must be dignifying and not compromise their care and protection.

- > Consult/advise with the local Child Protection Contact first.
- > Before photographing or filming a child, take care to ensure compliance with local traditions or restrictions for reproducing personal images.
- > Before photographing or filming a child, obtain informed consent from the child (depending on age and capacity) or parent or guardian of the child. An explanation of how the photograph or film will be used is essential. All such photographs will have a release on file signed by the subject(s) (depending on age and capacity or their guardian). Releases are not required if an individual’s identity is not discernible.
- > Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Image must not be next to vulnerable, submissive or sexually suggestive wording where it could be determined that the image is associated with that wording.
- > Children must be adequately clothed and not in poses that could be seen as sexually suggestive.
- > Ensure images are honest representations of the context and the facts.
- > Ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.
- > Ensure confidentiality of the children.

8 Appropriate use of IT and communication systems

Cardno personnel must not use IT and communication systems such as computers, mobile phones, or video and digital cameras inappropriately, including to exploit or harass children, or to access child exploitation material or other inappropriate material through any medium. Accessing child pornography is strictly prohibited and will be dealt with promptly, including reporting to relevant law enforcement agencies.

Cardno IT systems and networks are monitored for usage, downwards, and uploads, and produce summary report of inappropriate content.

² Criminal checks must be conducted for each country in which the individual has lived for 12 months or longer over the last five years, and for the individual’s country of citizenship.

Who should report?

It is mandatory for all Cardno personnel to report immediately any suspected or alleged case of child exploitation, abuse, safety, possession of child exploitation material, or policy non-compliance.

What should be reported?

Any behaviour that you see, suspect, or is reported to you about a Cardno personnel or partner working with Cardno regarding:

- > Breach of the Cardno Child Protection Procedure or [Child Protection Code of Conduct](#);
- > breach of any client Child Protection or safeguards policy, including professional behaviours;
- > a child protection related misconduct issue;
- > a person having committed, or been arrested for, or convicted of, a criminal offence(s) relating to any child exploitation or abuse;
- > child disclosure of exploitation and abuse;
- > Suspicion or allegation of possession or accessing of child pornography or child exploitation material;
- > Suspicion or allegation of child exploitation and abuse
- > criminal proceedings being undertaken in regard to child exploitation and abuse;
- > any report made to you by anyone, including a child or community member, relating to notifiable behaviour;
- > any child safety incident related to site access of a Cardno managed activity, including construction related activity.

Reporting is not restricted to acts committed by Cardno personnel and partners. It also includes:

- > a client or donor staff member, including locally engaged staff;
- > any personnel of a client-funded contractor or civil society organisation, including sub-contractors and grantees;
- > personnel of a client-funded multilateral organisation;
- > a client-funded volunteer or internship;
- > an employee of a related client government agency;
- > a client scholarship or fellowship awardee;
- > a client grant recipient;
- > any Australian citizen, Australian permanent resident or Australian company. As an Australian listed company Cardno is bound by Australian extraterritorial laws relating to child protection.
- > Other citizens or permanent residents of jurisdictions in which Cardno has a registration.

What if I am not sure?

Seek confidential advice from the [Child Protection Officer](#) or local [Child Protection Contact point](#) in the first instance. You may also seek advice from management or HR.

When do I report?

Immediately, or as soon as practical.

Who do I report to?

Cardno [Child Protection Officer](#) or [Child Protection Contact point](#) are trained in handling reporting.

Reporting must be confidential. However, the person who receives a report may have a duty to disclose to certain persons including to prevent further harm.

The reporter will assess our disclosure requirements to the respective client and work with the relevant manager to prepare a disclosure report.

Other reporting mechanisms:

- > [Third Party anonymous whistle-blower hotline](#); or,
- > Employee's line manager; or,
- > Human Resources; or,
- > Relevant Regional/Country/Unit manager; or
- > Client or donor reporting mechanisms.

How do I report?

Complete as much of the [Cardno Child Incident Notification Form](#) as you can and submit to the [Child Protection Officer](#).

The Child Protection Officer or Local Safeguards Lead will assess our discloser requirements to the respective client and work with the relevant manager to prepare a report.

The Cardno representative or partner will contact the child's parent(s) or guardian(s) unless this would jeopardise the child's welfare or that of the reportee (e.g. child's sibling).

10 What to do if a child discloses exploitation and abuse

If a child discloses to you that they are concerned about someone's behaviour towards them or makes a direct allegation you should:

- Listen carefully to what the child says about his or her concern or allegation;
- Reassure the child that you believe what he or she is telling you;
- Ensure that the child understands and is reassured that he or she is not responsible for the abuse and it is not his or her fault that it has occurred;
- Ensure that the child understands that a report will be made to those with the necessary authority to stop the abuse and that the child is assisting in that process by sharing about his or her experience;
- Provide assurance to the child that it was right that they shared the information with you;
- Organize appropriate professional support for the child including physical and/or mental medical support.

When discussing abuse with the child during the first telling ensure that there is a clear understanding of the emotional distress the child may be experiencing. Ensure a caring and sensitive approach to the child and assure them of a willingness to listen and assist if there is a problem. It is also important when handling a disclosure that you do not:

- panic or show other negative emotions (e.g. anger);
- make promises you cannot keep;
- ask why;
- ask closed or leading questions;
- give an impression that you blame the child;
- touch the child;
- attempt to investigate or confront persons accused in the disclosure.

11 Confidentiality

An allegation of child exploitation and abuse is a serious issue and it is crucial all parties maintain strict confidentiality. Sharing of information, which could identify a child or an alleged perpetrator, should be purely on a 'need to know' basis and only to those who have a legitimate need to receive the information. Unless exploitation and abuse has actually been proved to have occurred, it must always be referred to as 'alleged exploitation and abuse'. Documentation obtained or created as a result of investigations will be kept confidential until such time as it may be required to be handed to judicial mechanisms.

12 Counselling support

Where available, arrangements will be made to provide specialist confidential counselling and advice to all parties involved, during and following an incident or allegation of abuse or a complaint. This can be arranged through ID HR Contact or through locally based counselling support services.

13 Investigation

The nature of an allegation of will determine the type of investigation. Cardno will take steps to ascertain initial information and if required, engage authorities including police if required.

Where allegations involve Cardno staff they may be suspended or allocated other duties while the investigation is carried out. Cardno will determine similar actions with partners or subcontractors where allegations have been presented and an investigation is underway.

Cardno will ensure that all cases are investigated and reach a conclusion. Cardno will complete a final case report and reflect on lessons learned and possible additional risk mitigation. All parties will be treated fairly.

Senior management will determine the appropriate person(s) to undertake an investigation, taking advice from the safeguarding lead and, if required, third party investigators.

14 Child welfare

Cardno adopts a victim/survivor centred approach. The best interests of the child should always govern decisions regarding what action should be taken in response to concerns. The safety of the child must always be the overriding consideration in managing internal reporting procedures and investigations. Where there is a conflict of interest the needs of the child must come first; no child should be put at more risk by actions taken. In many jurisdictions the decision concerning the 'best interests' of the child will not necessarily be up to Cardno. In serious cases of exploitation and abuse, outside agencies will be responsible for the care of the child and decide on any further action. In these circumstances it is the responsibility of Cardno personnel to assist these agencies wherever possible.

15 Consequences

Child exploitation and abuse, including child pornography, is a serious transnational crime. Failure to act in accordance with this policy including any breach of the [Child Protection Code of Conduct](#) may result in disciplinary action, dismissal, or referral to authorities.

Document History and Version Control

Version #	Issue Date	Description of Revision	Document Owner	Approved by
4	11 June 2020	Updated to be Division policy. Removed reference to AP & DFAT. Additional content on due diligence.	Child Protection Officer (BF)	Global Risk Manager (JdB)
3	22 Jan 2020	Minor updates following DFAT spot check of Indonesia programs.	Child Protection Officer (BF)	Global Risk Manager (JdB)
2	1 June 2018	Update Hiring Manager provisions	Child Protection Officer	Area Operations Manager (JdB)
1	10 May 2018	Creation of new document	Child Protection Officer	Area Operations Manager (JdB)

Annex 1 Glossary of Terms

Abuse	<p>Includes:</p> <p>Physical abuse: the use of physical force against a child that results in harm to the child. Physically abusive behaviour includes shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning.</p> <p>Neglect: the failure by a parent or caregiver to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being.</p> <p>Emotional abuse: refers to a parent or caregiver's inappropriate verbal or symbolic acts toward a child, or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child's self-esteem or social competence.</p> <p>Sexual abuse: the use of a child for sexual gratification by an adult or significantly older child or adolescent. Sexually abusive behaviours can include fondling genitals, masturbation, oral sex, vaginal or anal penetration by a penis, finger or any other object, fondling breasts, voyeurism, exhibitionism and exposing the child to, or involving the child in, pornography.</p> <p>Ill-treatment: disciplining or correcting a child in an unreasonable and seriously inappropriate or improper manner; making excessive and/or degrading demands of a child; hostile use of force towards a child; and/or pattern of hostile or unreasonable and seriously inappropriate degrading comments or behaviour towards a child.</p>
Personnel	<p>Including but not limited to Cardno employees (national and international), advisers, grantees, associates, directors, contractors and their sub-contractors, awardees, casuals, volunteers, interns, and trustees.</p>
Behavioural-based interview questions	<p>Interview questions that probe the applicant's past behaviour in specific situations relevant to the position. Behavioural-based questions give interviewers additional information as to the applicant's suitability to work with children.</p>
Child or children	<p>Human being under the age of 18 unless under the law applicable to the child, majority is attained earlier. For the purposes of this policy, Cardno considers a child to be a person under the age of 18 years.</p>
Child abuse material	<p>Material that depicts (expressly or implicitly) a child under 18 years of age as a victim of torture, cruelty or physical abuse.</p>
Child exploitation and abuse	<p>One or more of the following:</p> <ul style="list-style-type: none">> 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; and <p>using a minor for profit, labour, sexual gratification, or some other personal or financial advantage.</p>
Child exploitation material	<ul style="list-style-type: none">> Material, irrespective of its form, which is classified as child abuse material or child pornography material.
Child pornography	<p>In accordance with the Optional Protocol to the Convention on the Rights of the Child, 'child pornography' means 'any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes.' For further information regarding child pornography offences, refer to the <i>Criminal Code Act 1995</i>.</p>
Child pornography material	<p>Material that depicts a person, or is a representation of a person, who is, or appears to be, under 18 years of age and is engaged in, or appears to be engaged</p>

in, a sexual pose or sexual activity, or is in the presence of a person who is engaged in, or appears to be engaged in, a sexual pose or activity, and does this in a way that a reasonable person would regard as being, in all the circumstances, offensive.

Child protection	An activity or initiative designed to protect children from any form of harm, particularly arising from child exploitation and abuse.
Child safeguarding	The broad obligation on Cardno personnel to ensure that the design and delivery of programs and program related activities do not expose children to adverse impacts, including the risk of abuse and exploitation, and that any concerns about children's safety within the communities where they work are appropriately reported.
Contact with children	Working on an activity or in a position that involves or may involve contact with children, either under the position description or due to the nature of the work environment (See also Working with Children definition).
Criminal record check	A check of an individual's criminal history record. In Australia, national criminal record checks are available through state and territory police departments. They take around 20 working days. The type of employment should be specified as 'overseas employment.' Overseas, different checking procedures apply in each country and may take six weeks or longer.
Grooming	Generally, refers to behaviour that makes it easier for an offender to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child, and then seek to sexualise that relationship (for example by encouraging romantic feelings or exposing the child to sexual concepts through pornography).
Harm	Any detrimental effect on a child's physical, psychological or emotional wellbeing. Harm may be caused by financial, physical or emotional abuse, neglect, and/or sexual abuse or exploitation whether intended or unintended.
Informed consent	Ensures the child and the parent or guardian understand the implications, purpose and potential uses of photographs or videos.
Online grooming	The act of sending an electronic message with indecent content to a recipient who the sender believes to be under 18 years of age, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender.
Working with children	Working with children means 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 works.