

- **Burmese Community Development Collaboration (BCDC)**

CHILD SAFEGUARDING POLICY

Version 2.0

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1. INTRODUCTION

The Burmese Community Development Collaboration (BCDC) is committed to upholding the rights, safety, and well-being of all children who come into contact with our programs, services, staff, volunteers, and partners. This commitment is underpinned by international human rights instruments, including the United Nations Convention on the Rights of the Child (UNCRC), and national child protection laws in Australia and countries where BCDC operates or supports programs.

Children have the right to be protected from all forms of harm, abuse, neglect, and exploitation. As a community organization that supports displaced populations, refugees, and other vulnerable groups—including programs involving education, health, humanitarian assistance, and resettlement support—BCDC recognizes that children may be especially at risk. We acknowledge our duty of care to prevent and respond to any potential risks to children and to ensure that our work promotes child safety at all times.

This policy provides a comprehensive framework for ensuring that child safeguarding is fully integrated into BCDC’s operations, partnerships, personnel practices, and program delivery. It sets out clear expectations for behavior, reporting obligations, recruitment and training practices, and mechanisms for accountability. All individuals associated with BCDC—including employees, volunteers, consultants, contractors, and partners—are required to understand and uphold this policy.

Through the implementation of this Child Safeguarding Policy, BCDC reaffirms its commitment to creating environments where children are respected, protected, empowered, and actively involved in matters that affect them.

2. STATEMENT OF COMMITMENT TO CHILD SAFEGUARDING

BCDC affirms that the safety and well-being of children is paramount. We believe every child has the right to be protected from all forms of violence, abuse, neglect, and exploitation, regardless of their age, gender, religion, ability, ethnicity, socio-economic status, or nationality.

We are committed to actively promoting child-safe environments in all aspects of our work—both in Australia and overseas—and to preventing any form of child abuse or harm by our staff, volunteers, contractors, partners, or associates. We recognize that safeguarding children is a shared responsibility and requires proactive measures across our policies, systems, programs, and relationships.

Specifically, BCDC commits to:

- Embedding child safeguarding as a core component of our organizational culture, governance, and program delivery.
- Taking a zero-tolerance approach to any form of child abuse, exploitation, or misconduct.
- Ensuring that all individuals engaged by BCDC understand and adhere to their responsibilities under this policy.
- Promoting child participation and listening to children’s views, ensuring they feel safe and supported to speak up.
- Undertaking thorough risk assessments and implementing safeguards in all contexts where children may be involved.
- Responding to all concerns and allegations of child abuse in a timely, fair, and effective manner.

This commitment applies to all BCDC personnel and representatives, including staff, volunteers, contractors, board members, interns, partner organizations, and anyone acting on behalf of BCDC.

By establishing and maintaining a robust child safeguarding system, BCDC aims to ensure that children are protected and treated with dignity and respect in all our programs and operations.

3. PURPOSE AND SCOPE OF THE POLICY

3.1 Purpose

The purpose of this Child Safeguarding Policy is to provide a clear framework that guides BCDC and all associated personnel in preventing, identifying, and appropriately responding to any risks of harm, abuse, or exploitation of children involved in or impacted by our programs, activities, or operations.

The policy is designed to:

- Establish and communicate BCDC’s zero-tolerance stance on child abuse and exploitation.
- Set out expectations and responsibilities for all BCDC personnel, partners, and stakeholders regarding the protection and welfare of children.
- Embed child safeguarding into BCDC’s organizational systems, program design, operations, and culture.
- Ensure that allegations or concerns relating to child harm are managed promptly, appropriately, and with full adherence to principles of confidentiality, child protection, and legal compliance.
- Promote child-safe practices and empower children to participate safely and meaningfully in our programs and services.

This policy reflects BCDC’s commitment to uphold children’s rights as outlined in the **United Nations Convention on the Rights of the Child (UNCRC)** and aligns with relevant child protection laws and standards in Australia and all other countries where BCDC operates.

3.2 Scope

This policy applies to:

- **All BCDC staff** (including full-time, part-time, and casual employees);
- **Board members and executives;**
- **Volunteers, interns, and trainees;**
- **Contractors and consultants;**
- **Partner organizations and their personnel**, where partnership involves working with or having contact with children;
- **Any individual engaged by or acting on behalf of BCDC**, either in Australia or overseas.

The policy is relevant to all BCDC activities where children are present, involved, or affected—either directly or indirectly—including humanitarian assistance, development programs, community engagement, advocacy, and fundraising.

Where BCDC works through partners or collaborates with community-based groups, we will ensure that child safeguarding standards are understood, adopted, and monitored as part of all partnership agreements and program implementation.

4. DEFINITIONS

Understanding key terms related to child safeguarding is essential for the effective implementation of this policy. The following definitions apply throughout this document:

Child / Children

A person under the age of 18 years, as defined by the United Nations Convention on the Rights of the Child (UNCRC), regardless of the legal age of majority in the country where BCDC operates.

Child Abuse

Any action or lack of action that causes harm, potential harm, or threat of harm to a child. This includes but is not limited to:

- **Physical abuse** – Intentional use of physical force that results in, or has a high likelihood of resulting in, harm to the child’s health, survival, development, or dignity.
- **Emotional abuse** – Persistent emotional ill-treatment that impacts a child's emotional development, including isolation, rejection, threats, criticism, and exposure to family violence.
- **Sexual abuse** – Involvement of a child in sexual activity that they do not fully comprehend, are unable to give informed consent to, or that violates laws or social taboos. This includes exploitation through prostitution, pornography, or online grooming.
- **Neglect** – Failure to provide for a child’s basic needs, including failure to ensure access to food, shelter, clothing, education, and medical care.
- **Exploitation** – Use of a child for profit, labour, sexual gratification, or other personal or financial advantage.

Child Safeguarding

The broad range of policies, procedures, and practices that BCDC puts in place to protect children from abuse, neglect, exploitation, and violence and to ensure their well-being in the context of our programs and operations.

Child Protection

An aspect of safeguarding that involves direct intervention when a child is believed to be at risk of significant harm. This may involve reporting to child protection authorities or taking immediate protective action.

Child-Sensitive Practices

Approaches and actions that recognize the developmental needs, rights, and dignity of children. This includes communication, program design, and reporting procedures that are age-appropriate, respectful, and inclusive.

Personnel

All individuals engaged by BCDC, including employees, contractors, volunteers, Board members, interns, and consultants.

Partner Organizations

Any organization working with or on behalf of BCDC through formal partnership arrangements. This includes implementing partners, local NGOs, and community-based organizations.

Safeguarding Focal Point / Child Protection Officer

A designated individual within BCDC responsible for overseeing the implementation of the child safeguarding policy and responding to concerns or incidents of child abuse or risk of harm.

5. ORGANIZATIONAL CONTEXT AND RISK PROFILE

BCDC operates as a not-for-profit community development organization serving both newly arrived communities in Australia and displaced communities across the Myanmar-Thai border and other regions affected by conflict, poverty, and forced migration. In doing so, BCDC engages with a wide variety of stakeholders including children, families, community-based partners, contractors, and volunteers—some of whom may have direct or indirect contact with children.

BCDC acknowledges that safeguarding risks can vary significantly based on the nature of the activities, the setting in which they occur, and the profile of individuals involved. This section provides an overview of the specific organizational context and identifies the potential child safeguarding risks across BCDC's programs.

5.1 Operational Context

- In **Australia**, BCDC conducts social cohesion and refugee resettlement programs, senior support activities, youth development, and occasional child- and family-focused events in local community centers and public venues.
- In **cross-border settings**, BCDC supports humanitarian and educational programs for displaced children and vulnerable families, often in areas where formal child protection infrastructure is weak or absent.
- BCDC's services may be delivered in-person, remotely, or through partner organizations.

5.2 Nature of Child Contact

- **Direct Contact:** BCDC staff or volunteers may engage directly with children during community activities, training, workshops, or while collecting testimonials or media content.
- **Indirect Contact:** This includes access to children's personal data, case files, photographs, or through working with adults responsible for children's care.

5.3 Identified Safeguarding Risks

- **Displacement and Vulnerability:** Many children supported by BCDC's programs are living in unstable or insecure environments and may have experienced trauma, making them more vulnerable to abuse or exploitation.
- **Limited Oversight in Remote Areas:** In cross-border or partner-implemented projects, BCDC may not always have direct oversight of activities, raising risks of inconsistent application of safeguarding standards.
- **Low Literacy and Language Barriers:** Communication gaps in multicultural contexts may reduce the ability of children and caregivers to report concerns or understand their rights.
- **Media and Communications:** The collection and dissemination of children's images or stories can lead to unintentional exposure if not properly managed.
- **Community Events and Outreach:** Where public gatherings occur, risks may arise from informal interactions or lack of supervision protocols.

5.4 Risk Mitigation Strategies

To respond to these risks, BCDC is committed to:

- Embedding child safeguarding requirements in all **program design, staff roles, and partner agreements.**
- Conducting **child safeguarding risk assessments** for all projects, with special consideration for activities involving displaced populations or limited regulatory environments.
- Ensuring that **all staff, volunteers, and partners** are trained and supported in child protection protocols appropriate to their role and level of engagement.
- Establishing **clear incident reporting mechanisms** across all program areas, including culturally and linguistically accessible methods.
- Monitoring partners for **ongoing compliance** with safeguarding expectations through check-ins, documentation reviews, and capacity-building support.

This proactive approach ensures that child safeguarding remains central to BCDC's operations, regardless of where or how services are delivered.

6. GUIDING PRINCIPLES

BCDC is committed to upholding the rights and well-being of all children we work with and serve. Our approach to child safeguarding is guided by the following principles, which underpin every aspect of our programs, partnerships, governance, and organizational culture:

6.1 Best Interests of the Child

The best interests of the child shall always be the primary consideration in all actions and decisions that affect them. This includes decisions related to program design, response to complaints or disclosures, and engagement with families and communities.

6.2 Zero Tolerance for Child Abuse

BCDC maintains a strict zero-tolerance policy for all forms of child abuse, neglect, exploitation, and violence. Any form of child abuse by BCDC personnel, volunteers, or partners will result in immediate disciplinary action, including termination of engagement and referral to relevant authorities when necessary.

6.3 Shared Responsibility

Child safeguarding is a collective responsibility. All BCDC staff, volunteers, and partners must be aware of their responsibilities and actively promote safe environments for children. BCDC fosters a culture of vigilance and accountability.

6.4 Risk Awareness and Mitigation

BCDC recognizes that all its programs, activities, and operations have potential safeguarding risks. We commit to conducting regular risk assessments and integrating safeguarding measures in project design, implementation, and monitoring.

6.5 Empowerment and Participation of Children

Children have the right to be heard and to participate in decisions that affect their lives. BCDC values and promotes child participation in a safe and age-appropriate manner. We will ensure that children are provided with accessible information on their rights and how to report concerns.

6.6 Non-Discrimination

All children, regardless of their race, ethnicity, religion, ability, gender, sexual orientation, socio-economic status, or immigration status, have equal rights to protection and safety. BCDC commits to creating inclusive, child-safe environments that respect and celebrate diversity.

6.7 Confidentiality and Privacy

All child protection concerns and disclosures will be handled with the highest degree of confidentiality. Information will be shared strictly on a need-to-know basis and in line with BCDC's Privacy Policy, the **Privacy Act 1988 (Cth)**, and any applicable local laws.

6.8 Prompt and Effective Response

All allegations, suspicions, or disclosures of child abuse will be taken seriously and responded to promptly and appropriately. BCDC will take all necessary steps to protect the child and support those involved in the reporting and investigation process.

6.9 Compliance with Legal and Regulatory Frameworks

BCDC complies with all applicable Australian child protection laws and international standards, including:

- **ACFID Code of Conduct** and its associated Quality Assurance Framework
- **Australian Child Protection Legislation**
- **UN Convention on the Rights of the Child (UNCRC)**
- Any host country legal obligations where BCDC operates

7. CODE OF CONDUCT FOR WORKING WITH CHILDREN

This Code of Conduct outlines expected standards of behavior for all individuals engaged with BCDC—including staff, volunteers, board members, contractors, interns, and partners—when interacting with or working in proximity to children. It aims to promote child-safe practices, prevent abuse and exploitation, and protect both children and BCDC representatives from harm or allegations.

All individuals associated with BCDC must sign and comply with this Code as a condition of engagement.

7.1 Acceptable Behavior

BCDC personnel and representatives must:

- Treat all children with dignity, respect, and equality, regardless of their background or characteristics.
- Ensure that interactions with children are appropriate and conducted in open, visible, and culturally sensitive ways.
- Listen to and value children’s ideas, opinions, and contributions.
- Use positive and non-violent methods to manage children's behavior.
- Always be visible when working with children. Where possible, another adult should be present or informed of activities involving children.
- Immediately report any concerns, disclosures, or allegations of abuse or mistreatment following BCDC’s complaint handling procedures.
- Seek permission from a child and their guardian before photographing, filming, or using images for communication and ensure the context is respectful and non-exploitative.

7.2 Unacceptable Behavior

BCDC personnel and representatives must never:

- Use language, behavior, or gestures that are inappropriate, sexually suggestive, abusive, discriminatory, or culturally insensitive around or toward children.
- Engage in any form of sexual activity or relationships with children under the age of 18, regardless of the age of consent locally or mistaken belief in the age of the child.
- Hit, physically assault, or emotionally abuse a child.
- Develop any form of relationship with a child that could be considered exploitative or abusive.
- Spend time alone with a child in an enclosed or private setting, unless unavoidable and previously authorized.
- Give personal gifts or offer special treatment to a child, except as part of an approved program or in coordination with caregivers.
- View, possess, produce, or distribute materials that exploit children, including pornography or other forms of abuse.
- Sleep in the same room or bed as a child unless absolutely necessary and authorized in advance (e.g. in emergencies or travel, with parental consent and supervision).
- Ignore or fail to report any concern, disclosure, or suspicion of abuse or exploitation.

7.3 Disciplinary Measures

Any breach of this Code of Conduct may result in disciplinary action, including:

- Suspension or termination of employment or engagement
- Reporting to relevant authorities or regulatory bodies
- Legal action under relevant criminal or civil law

7.4 Agreement to the Code

All BCDC representatives are required to:

- Read and understand the Code of Conduct
- Complete safeguarding training as part of their induction
- Sign a written agreement to uphold the Code before beginning their involvement with BCDC

8. RECRUITMENT, SCREENING AND INDUCTION

BCDC recognizes that safeguarding children begins with the careful and thorough recruitment of staff, volunteers, contractors, and partners. This section outlines the measures taken to ensure that all individuals associated with BCDC are suitable to work with or near children and understand their responsibilities in upholding child protection standards.

8.1 Child-Safe Recruitment Practices

BCDC integrates child safeguarding into all recruitment processes to prevent the engagement of individuals who may pose a risk to children. This includes:

- **Clear Position Descriptions:** All roles, including volunteer and consultancy roles, will specify child safeguarding responsibilities where applicable.
- **Job Advertisements:** Publicly advertised roles must reflect BCDC's commitment to child safeguarding and note that criminal background checks and reference verifications will be required.
- **Interview Process:** Interviews for relevant positions will include specific questions related to child safeguarding, ethical decision-making, and scenarios to assess the candidate's understanding of child protection.

8.2 Pre-Engagement Screening

Before any engagement is confirmed, BCDC will conduct the following checks:

- **Criminal History Check:** All staff, volunteers, and relevant contractors must undergo national police check and, where necessary, an international police clearance or statutory declaration where a formal check is unavailable.
- **Working with Children Check (WWCC):** Required for any individual working directly with children in jurisdictions where such checks are mandatory (e.g., NSW).
- **Reference Checks:** At least two professional references must be obtained and include questions regarding the applicant's suitability to work with children.
- **Identity Verification:** BCDC will verify the candidate's identity using photo identification and relevant credentials.

8.3 Red Flags for Recruitment

The following will be considered red flags and will disqualify a candidate from engagement:

- Refusal or inability to provide required background checks
- History of offences related to children, violence, exploitation, or abuse
- Inconsistencies in employment history relating to work with vulnerable groups
- Reluctance to discuss attitudes toward children or safeguarding practices

8.4 Induction and Onboarding

All new staff, volunteers, and relevant partners must undergo a formal induction process, which includes:

- Orientation to BCDC's Child Safeguarding Policy, Code of Conduct, and reporting procedures
- Completion of child protection and safeguarding training within the first month of engagement
- Signing of the Child Safeguarding Code of Conduct
- Access to the Complaints Handling Policy and Whistleblower Policy

8.5 Ongoing Commitment

Safeguarding is a continuous responsibility. Therefore:

- BCDC will provide refresher training on child safeguarding annually.
- Any change in a person's role or responsibilities will trigger a review of their need for further child-specific training or screening.
- Engagement may be suspended or terminated if new information arises indicating a safeguarding risk.

9. EDUCATION AND TRAINING

BCDC acknowledges that ongoing education and training are fundamental to embedding a child-safe culture and ensuring that all individuals associated with the organization are equipped to prevent, identify, and respond to child safeguarding risks and incidents.

9.1 Commitment to Capacity Building

BCDC is committed to building the capacity of all staff, volunteers, and representatives to understand, uphold, and implement child safeguarding measures. This includes providing initial and ongoing training opportunities tailored to the different roles and levels of contact with children.

9.2 Mandatory Safeguarding Training

All BCDC personnel who are engaged in roles involving contact with children or decision-making authority over children's programs must complete mandatory safeguarding training. This includes:

- **Induction Training:** Delivered within the first four weeks of engagement and includes:
 - BCDC's Child Safeguarding Policy and Code of Conduct
 - Recognizing signs of abuse and exploitation
 - Reporting procedures and responsibilities
 - Cultural and contextual sensitivities in safeguarding
- **Annual Refresher Training:** Required to ensure ongoing awareness and reinforce key concepts and procedural updates.
- **Specialist Training:** For roles with direct and frequent interaction with children, additional training on trauma-informed practices, psychosocial support, and working with children with disabilities will be provided.

9.3 Partner and Contractor Training

Where BCDC works with implementing partners, consultants, or contractors, safeguarding training obligations will be incorporated into agreements. BCDC will provide or facilitate training sessions for external partners, ensuring they:

- Are familiar with BCDC’s safeguarding expectations and reporting processes
- Have internal mechanisms for managing child protection concerns
- Understand the risks and obligations of their role in protecting children

9.4 Training for the Board and Senior Leadership

BCDC’s Board of Directors and Executive Team are required to:

- Undertake child safeguarding governance training annually
- Understand their leadership responsibilities in monitoring organizational compliance and culture
- Ensure safeguarding is embedded in strategic decisions, risk management, and resource allocation

9.5 Documentation and Monitoring

- Attendance at training will be recorded and tracked in a central register.
- Training content will be reviewed annually to remain aligned with best practices and legal requirements.
- Non-compliance with training requirements may result in suspension of duties or review of engagement status.

10. RISK MANAGEMENT

Child safeguarding is embedded within BCDC’s overarching risk management framework. This ensures that child protection is not treated as a standalone issue, but is integrated into program design, delivery, staffing, communications, and partnerships.

10.1 Integrating Safeguarding into Organizational Risk Management

Child safeguarding is embedded within BCDC’s overarching risk management framework. This ensures that child protection is not treated as a standalone issue, but is integrated into program design, delivery, staffing, communications, and partnerships.

All programs, operations, and activities—whether conducted in Australia or internationally—will be systematically reviewed to:

- Identify actual and potential risks to children
- Assess the likelihood and potential impact of those risks
- Develop and implement appropriate mitigation and response strategies
- Review and update risk assessments periodically, particularly when there are changes to operations or context

10.2 Child Safeguarding Risk Assessment

Risk assessments specific to child safeguarding are required for:

- Any program or project involving direct or indirect contact with children
- Recruitment of personnel for child-related roles
- Partner organizations working with or near children
- Communications, media, and use of child images or stories
- Organizational events or public activities where children may be present

Child safeguarding risk assessments must be conducted at the planning stage and reviewed regularly throughout implementation.

10.3 Safeguarding Risk Mitigation Measures

Mitigation strategies may include, but are not limited to:

- Ensuring that physical spaces and activities are designed with child safety in mind
- Having appropriate child-to-adult supervision ratios
- Ensuring all personnel working with children undergo Working with Children Checks (WWCC), National Police Checks, or local equivalent background screenings
- Developing safeguarding clauses in contracts and Memoranda of Understanding with third-party partners and suppliers
- Limiting unsupervised access to children to trained, authorized individuals only
- Providing child-friendly reporting mechanisms at project sites

10.4 Risk Monitoring and Review

Safeguarding risk management is an ongoing process. BCDC will:

- Regularly review risk registers at project, program, and organizational levels
- Monitor safeguarding incidents or near misses to identify patterns or gaps
- Conduct annual safeguarding audits or reviews
- Ensure that lessons learned from safeguarding breaches or investigations inform future risk planning

10.5 Accountability for Risk Management

All BCDC staff, volunteers, and partners share responsibility for identifying and managing safeguarding risks. However, ultimate accountability for ensuring risks are adequately addressed lies with:

- The Board of Directors (oversight and governance)
- Executive Management (policy and resourcing)
- Safeguarding Focal Point (technical support and compliance)

11. COMMUNICATION AND USE OF CHILDREN'S IMAGES AND PERSONAL INFORMATION

BCDC recognizes that while communication materials can be powerful tools for advocacy, fundraising, and reporting, they also carry risks if not handled ethically. We are committed to safeguarding the dignity, privacy, and protection of all children featured in any form of media or public documentation.

11.1 Guiding Principles for Use

- Children have a right to **privacy and protection**, including how their images and personal information are collected, stored, and shared.
- All communication and promotional activities must ensure that **children are not exposed to harm**, stigmatization, discrimination, or traumatization.
- Consent must be **freely given, informed, and specific** to the use of the child's image or information.

11.2 Consent Requirements

- **Informed written consent** must be obtained from the child's parent or legal guardian prior to taking or using any photograph, video, or audio recording.
- **Assent from the child** must also be sought in an age-appropriate and culturally sensitive manner.
- Consent forms must clearly outline:
 - The purpose of the image or story.
 - Where and how it will be used (e.g., website, social media, reports).
 - The right to withdraw consent at any time.

11.3 Guidelines for Photographs, Videos, and Testimonials

- Children should be **dressed appropriately** and portrayed in a dignified manner, not in distress, submission, or unsafe situations.
- **Images must not reveal the identity** of survivors of abuse, victims of trafficking, or children in vulnerable or exploitative circumstances.
- Where identification is not appropriate, measures such as **blurring faces, changing names, or using silhouettes** must be applied.
- Photographers and content creators must be **trained in child safeguarding protocols**.

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- Where identification is not appropriate, measures such as **blurring faces, changing names, or using silhouettes** must be applied.
- Photographers and content creators must be **trained in child safeguarding protocols**.

11.4 Storage and Security of Content

- All images, recordings, and personal data of children must be:
 - **Stored securely** in password-protected systems.
 - **Access-limited** to authorized personnel only.
 - **Destroyed** when no longer required or when consent has been withdrawn.

11.5 Prohibited Practices

- No child's image or personal story may be used for commercial purposes or in ways that:
 - Exploit the child's situation.
 - Reinforce negative stereotypes.
 - Compromise the child's safety or dignity.
- BCDC staff and partners are prohibited from using children's images on their **personal social media accounts**.

11.6 Monitoring and Compliance

- BCDC's Communications and Safeguarding focal points will regularly:
 - Audit materials published or shared by the organisation.
 - Ensure compliance with these guidelines.
 - Provide guidance and refresher training to all staff and contractors involved in communications.

12. REPORTING AND RESPONDING TO CHILD SAFEGUARDING CONCERNS

BCDC is committed to ensuring that all concerns, suspicions, allegations, or incidents of child abuse or exploitation are taken seriously, acted upon promptly, and handled with care, confidentiality, and fairness. All reports will be treated with urgency and will trigger appropriate protective and investigative responses.

12.1 Reporting Procedures

- **All staff, volunteers, contractors, and partners** are obligated to report any suspicion, disclosure, or allegation of child abuse or exploitation immediately.
- Reports must be made as soon as practicable, ideally within **24 hours** of the concern arising.
- Reports can be made to any of the following:
 - The designated **Child Safeguarding Focal Point**
 - The **CEO** or a member of **senior management**
 - The **Whistleblower Protection Officer** (if anonymity or conflict of interest exists)
- Reports should be documented using the **Child Safeguarding Incident Report Form**, which includes:
 - Name of child (if known) and age
 - Date, time, and location of the concern
 - Description of the incident, suspicion, or allegation
 - Name and contact details of the person making the report

Anonymous reports will also be accepted and investigated where sufficient information is available.

12.2 Responding to Reports

Upon receipt of a safeguarding report:

- An **initial assessment** will be conducted to determine the immediate risk to the child and necessary protective actions.
- If a child is in **immediate danger**, urgent steps will be taken to secure their safety, which may include notifying relevant authorities or child protection services.
- A formal **internal investigation** may be initiated where appropriate, following the procedures in BCDC's Complaints Handling and Whistleblower Policies.
- All safeguarding concerns will be handled in a manner that:
 - Prioritizes the **safety and wellbeing of the child**
 - Respects **confidentiality and privacy**
 - Respects the rights of all parties involved
 - Ensures **procedural fairness and transparency**
- BCDC will provide **support and referrals** for children and families affected by abuse, including medical, psychosocial, or legal assistance as needed.

12.3 Mandatory Reporting Obligations

- BCDC will comply with all **legal obligations** to report suspected child abuse to authorities in jurisdictions where it operates, including:
 - The **NSW Department of Communities and Justice** or relevant child protection agency
 - The **Australian Federal Police**, if crimes are suspected
- All staff and volunteers must be aware of and adhere to local mandatory reporting laws and know to whom and how to report.

12.4 Protection of Whistleblowers

- Individuals who report child safeguarding concerns in good faith will be protected from **retaliation**, discrimination, or disciplinary action.
- BCDC is committed to fostering an environment where concerns can be raised **without fear**.
- The identity of whistleblowers will be kept **confidential**, unless disclosure is required by law or consent is given.
- False or malicious reports made deliberately will be taken seriously and may lead to disciplinary action.

13. WORKING WITH PARTNERS AND CONTRACTORS

BCDC recognizes that effective child safeguarding depends on collaboration with partners, contractors, and affiliates who share its commitment to the safety and protection of children. Accordingly, BCDC will ensure that all external individuals and entities working with or on behalf of the organization uphold the highest standards of child protection.

13.1 Due Diligence and Screening of Partners

- BCDC will conduct **child safeguarding due diligence** before entering into partnerships, funding agreements, or service contracts with third-party organizations, local NGOs, implementing partners, consultants, or contractors.
- Due diligence will assess:
 - The partner's existing child safeguarding policies and practices
 - History of child protection breaches or complaints
 - Organizational risk level based on nature of activities and direct or indirect access to children
- If a partner does not have adequate safeguarding measures, BCDC will:
 - Require the partner to adopt or adhere to BCDC's Child Safeguarding Policy
 - Provide capacity-building support and/or technical assistance
 - Include safeguarding requirements in contracts or Memoranda of Understanding (MoUs)

13.2 Safeguarding Clauses in Agreements

- All partnership agreements, service contracts, and MoUs must contain **mandatory child safeguarding clauses**, which outline:
 - Adherence to BCDC's Child Safeguarding Policy and Code of Conduct
 - Requirements for partner staff to undergo background checks and child protection training, where applicable
 - Procedures for reporting child safeguarding incidents
 - Consequences for non-compliance, including contract termination

13.3 Training and Capacity Building for Partners

- BCDC will provide **child safeguarding induction and refresher training** to partners and contractors involved in activities where they may interact with or impact children.
- Training will cover:
 - Recognizing and responding to child abuse
 - BCDC's reporting procedures
 - The Child Safeguarding Code of Conduct
 - Local child protection laws and referral mechanisms
- Where relevant, BCDC will support partners to **develop or strengthen their own safeguarding frameworks**.

13.4 Monitoring and Compliance

- BCDC will **monitor compliance** with child safeguarding requirements through:
 - Regular partner assessments and compliance checklists
 - Periodic reviews or audits of safeguarding practices and documentation
 - Site visits and interviews with project staff, where appropriate
- If a breach of child safeguarding obligations is suspected or confirmed, BCDC will:
 - Initiate an internal review or investigation
 - Require immediate corrective measures
 - Suspend or terminate the agreement in serious cases

13.5 Reporting and Accountability for Partners

- Partners and contractors are obligated to report any concerns, disclosures, or allegations of child abuse or exploitation involving BCDC-funded activities within **24 hours**.
- Reports should be submitted to the designated BCDC **Child Safeguarding Focal Point** or through BCDC's **complaints and whistleblowing channels**.
- BCDC will support partners in managing safeguarding incidents, including:
 - Referral to local protection services
 - Coordinated investigation, if applicable
 - Post-incident support and resolution

13.6 Zero Tolerance

- BCDC maintains a **zero-tolerance approach** to child abuse and exploitation in any form.
- All partners and contractors are expected to align with BCDC's mission, values, and ethical standards.
- Breaches of child safeguarding standards will be considered serious misconduct and may result in:
 - Termination of contract or funding
 - Notification to relevant authorities
 - Public disclosure if warranted by the case and circumstances

14. PROGRAMS INVOLVING DIRECT OR INDIRECT CONTACT WITH CHILDREN

BCDC is committed to ensuring that all its programs and activities that involve children—either directly or indirectly—are designed and implemented with the highest level of child safeguarding standards. This includes taking proactive steps to mitigate risks, protect children's rights, and uphold their safety and dignity at all times.

14.1 Definition of Contact with Children

For the purposes of this policy, the following definitions apply:

- **Direct contact** includes physical or face-to-face interaction with children in any context, including service provision, education, counselling, medical aid, relief distribution, or community engagement.
- **Indirect contact** refers to access to children's personal information, images, or data; working in settings where children are present; or overseeing programs that affect children, even without direct interaction.

14.2 Risk Assessment in Program Design

- All BCDC programs involving children will undergo a **Child Safeguarding Risk Assessment** at the design and planning stages. This includes:
 - Identifying possible risks to children (e.g. exposure to exploitation, abuse, neglect, or harm)
 - Evaluating the nature and frequency of contact with children
 - Determining appropriate mitigation strategies and safeguards
- Risk assessments will be documented and reviewed regularly, especially during major changes to the program, location, or staff.

14.3 Safeguarding Measures During Implementation

- Programs must include the following safeguards when children are involved:
 - Clearly defined staff responsibilities and supervision procedures
 - Safe child-to-staff ratios
 - Safe physical environments (including child-friendly and secure spaces)
 - Confidential processes for children to raise concerns or complaints
 - Age-appropriate information provided to children about their rights and protections

14.4 Staff and Volunteer Conduct

- All staff, volunteers, and representatives engaging with children must:
 - Comply with the **Child Safeguarding Code of Conduct**
 - Have completed relevant **safeguarding training** and background checks
 - Maintain professional boundaries and never engage in behavior that could be perceived as exploitative, abusive, or harmful
- BCDC strictly prohibits:
 - Corporal punishment or emotional abuse
 - Discrimination based on gender, ability, race, or background
 - Unauthorized communication with children outside program activities

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14.5 Engaging Children in a Safe and Ethical Manner

- Children's **participation in programs** must always be voluntary, informed, and age-appropriate.
- Safeguarding considerations include:
 - Obtaining **informed consent** from parents or guardians
 - Respecting children's **privacy and dignity**
 - Ensuring activities do not cause distress, stigma, or re-traumatization
- Staff must ensure children's views are listened to and taken seriously when making decisions that affect them.

14.6 Monitoring and Continuous Improvement

- BCDC will monitor the effectiveness of its safeguarding measures in programs through:
 - Routine observations, feedback from children and parents, and staff reflection
 - Incorporation of child safeguarding into monitoring, evaluation, and learning (MEL) frameworks
 - Prompt corrective action in response to any identified concerns

15. CHILD SAFEGUARDING IN EMERGENCIES AND DISPLACEMENT SETTINGS

Emergencies—including natural disasters, conflict, displacement, and humanitarian crises—significantly heighten the risks of abuse, exploitation, neglect, and trafficking of children. BCDC recognizes its duty of care and reinforces that child safeguarding is not suspended in emergencies; instead, additional safeguards must be applied.

15.1 Elevated Vulnerability in Emergencies

In emergency or displacement settings, children may be:

- Separated from their families or caregivers
- Living in overcrowded or unsafe environments (e.g. camps or temporary shelters)
- Exposed to exploitation, sexual violence, recruitment by armed groups, or child labor
- At increased risk due to breakdowns in social protection and legal systems

Recognizing these heightened vulnerabilities, BCDC will integrate child safeguarding into all stages of emergency response planning and delivery.

15.2 Emergency Child Safeguarding Protocols

BCDC will adopt emergency-specific safeguarding measures that include:

- **Rapid risk assessments** in new or changing environments to identify and address child protection concerns
- Deployment of **trained child safeguarding focal points** in field operations
- Establishment of **safe spaces** for children and child-friendly complaint mechanisms
- Application of strict codes of conduct for staff and volunteers, even under high-stress conditions
- **Immediate referral pathways** to specialized child protection actors or services when concerns are identified

15.3 Identification and Support for At-Risk Children

BCDC will work to identify and support:

- **Unaccompanied and separated children** (UASC) and reunite them with family or place them in appropriate care
- Children with disabilities or those from marginalized groups who may require tailored support
- Children who have experienced trauma or violence through **psychosocial support** or referrals to specialist services

All actions will prioritize the child's **best interests** and **do no harm** principles.

15.4 Partnership and Coordination in Humanitarian Response

- BCDC will collaborate with **child protection agencies, UN bodies, and local service providers** to ensure a coordinated and rights-based response.
- BCDC will actively participate in relevant **Child Protection Working Groups** or **Protection Clusters** where possible.
- Shared safeguarding protocols and information-sharing agreements will be developed with implementing partners, while maintaining **confidentiality and data protection** for children.

15.5 Safeguarding Children During Aid Distribution and Service Delivery

To reduce risks during aid and relief activities:

- Distribution sites and services must be **safe, supervised, and accessible to children**
- Staff and volunteers must not withhold aid, demand favors, or coerce children or caregivers
- Aid must never be exchanged for access to children or personal relationships with families
- Safeguarding **risk mitigation measures** must be documented in project plans and monitored throughout implementation

16. INVOLVING CHILDREN AND YOUNG PEOPLE IN SAFEGUARDING MEASURES

BCDC believes that children and young people have a fundamental right to participate in decisions that affect their lives, including in the development and implementation of child safeguarding measures. Their participation is critical to building safer, more responsive, and more effective programs.

16.1 Principles of Child Participation

BCDC upholds the following principles to guide meaningful child participation:

- **Respect:** Children’s views are listened to and valued.
- **Voluntariness:** Participation is always voluntary and without coercion.
- **Age-appropriateness:** Activities and communication are adapted to the child’s evolving capacity.
- **Non-discrimination:** All children, regardless of gender, disability, ethnicity, or background, have equal opportunities to participate.
- **Protection:** Participation is safe, and risks are assessed and mitigated.

16.2 Integrating Child Voices into Programs

BCDC will:

- Consult children during program design, monitoring, and evaluation processes, particularly for initiatives that impact them directly.
- Use **child-friendly tools and approaches** (e.g., storytelling, drawings, group discussions) to gather input.
- Involve children in **risk identification** and the design of safeguarding strategies for their communities.
- Support the establishment of **youth advisory groups or child councils**, where feasible, to strengthen engagement.

16.3 Supporting Informed and Safe Participation

To ensure safe and informed participation, BCDC will:

- Explain the purpose and scope of engagement clearly, using age-appropriate language.
- Obtain **informed consent** from children and their caregivers before participation.
- Ensure **confidentiality and privacy** in how children’s information and contributions are handled.
- Provide support or referrals for any emotional or protection needs that arise during participation activities.

16.4 Building Children’s Safeguarding Awareness

BCDC commits to:

- Delivering **child-friendly safeguarding awareness sessions** so children know their rights and how to seek help.
- Providing information about **complaint and feedback mechanisms** accessible to children.
- Empowering children to **recognize unsafe situations** and encouraging them to speak out.

16.5 Feedback and Accountability to Children

- BCDC will develop channels for children to **provide feedback** on programs and safeguarding practices.
- Feedback will be reviewed and used to improve program safety and effectiveness.
- Children will be informed of the outcomes of their input in a way that is respectful and accessible.

17. IMPLEMENTATION, OVERSIGHT, MONITORING, AND CONTINUOUS IMPROVEMENT

BCDC is committed to embedding child safeguarding into every aspect of its operations, governance, and culture. This section outlines how the policy will be implemented, monitored, and reviewed to ensure ongoing effectiveness and alignment with best practice standards.

17.1 Responsibilities for Implementation

Implementation of this policy is a shared responsibility across all levels of the organization:

- **Board of Directors:** Holds ultimate responsibility for endorsing the policy, overseeing its implementation, and ensuring compliance across all areas of governance.
- **Executive Leadership and Management:** Accountable for integrating safeguarding into strategic planning, internal systems, and day-to-day operations.
- **Child Safeguarding Focal Person (CSFP):** Appointed to coordinate safeguarding activities, provide technical support, monitor compliance, and serve as the primary point of contact for concerns or reports.
- **All Staff, Volunteers, and Contractors:** Required to understand and uphold the policy, participate in safeguarding training, and report any suspected risks or violations.

17.2 Integration into Organizational Systems

The Child Safeguarding Policy will be fully integrated into all relevant BCDC frameworks, including:

- Recruitment, screening, and human resource practices
- Program and project design, budgeting, implementation, and evaluation
- Communications and media processes, especially the use of children's images
- Partnership agreements, MOUs, and procurement contracts
- Incident reporting mechanisms and case management systems
- Risk management and child protection mapping tools

Safeguarding responsibilities will be reflected in position descriptions, staff manuals, volunteer agreements, and organizational codes of conduct.

17.3 Training and Capacity Building

BCDC recognizes that effective safeguarding relies on the competence and confidence of all stakeholders. Therefore:

- All new staff, volunteers, and contractors will receive mandatory induction on child safeguarding.
- Refresher training will be conducted annually or as needed.
- Specialized training will be offered for staff working directly with or near children.
- Safeguarding resources and materials will be made available in culturally and linguistically appropriate formats.

17.4 Monitoring and Compliance

To ensure accountability and compliance:

- The Child Safeguarding Focal Person will lead regular monitoring activities, including desk audits, program spot checks, and risk assessments.
- All programs involving children will be reviewed for adherence to safeguarding standards.
- Any safeguarding gaps identified will trigger corrective action plans with follow-up.
- Compliance indicators will be included in performance management and program monitoring frameworks.

17.5 Stakeholder Feedback and Participation

BCDC encourages participation and feedback from children, families, staff, volunteers, and partners as part of a continuous improvement process:

- Child-friendly and anonymous feedback channels will be established.
- Feedback will be collected through satisfaction surveys, consultations, and community forums.
- Suggestions and concerns will be reviewed regularly to inform program refinement.

17.6 Policy Review and Updates

The Child Safeguarding Policy will undergo a formal review:

- **Frequency:** Every two (2) years, or earlier if prompted by legislative changes, emerging risks, or serious safeguarding incidents.
- **Process:** Led by the CSFP and Executive Team in consultation with staff, partners, and relevant stakeholders.
- **Approval:** Any changes will be submitted to the Board of Directors for formal approval.

Post-review, all staff and relevant stakeholders will be notified of updates, and new versions will be made publicly accessible on BCDC's platforms.

18. RELATED POLICIES AND LEGAL FRAMEWORKS

This section outlines the internal policies and external legal frameworks that inform and reinforce the BCDC Child Safeguarding Policy. Alignment with these standards ensures that BCDC adheres to best practice, complies with all legal requirements, and upholds its duty of care to children in all aspects of its work.

18.1 Internal Policies

The following BCDC policies and procedures are directly related to or supportive of this Child Safeguarding Policy:

- **BCDC Code of Conduct** – Outlines expectations for ethical and professional behaviour, including standards for working with children.
- **BCDC Recruitment and Human Resources Policy** – Ensures that safe recruitment, screening, and onboarding procedures are followed for all personnel.
- **BCDC Whistleblower Protection Policy** – Provides a mechanism for confidential reporting of child safeguarding violations and protections for those who report.
- **BCDC Complaints Handling Policy** – Establishes processes for handling complaints, including those related to child abuse and exploitation.
- **BCDC Financial Wrongdoing Policy** – Reinforces the importance of financial integrity and accountability, particularly where funds support child-focused programs.
- **BCDC Volunteer Management Manual** – Includes responsibilities and conduct expectations for volunteers in contact with children.
- **BCDC Gender Equality and Inclusion Policy** – Promotes equity and inclusion, addressing the intersectional risks that can impact children's safety.

18.2 National Legal and Policy Frameworks

BCDC is committed to full compliance with all relevant Australian and international child protection laws. These include:

- **Children and Young Persons (Care and Protection) Act 1998 (NSW)**
- **Child Protection (Working with Children) Act 2012 (NSW)**
- **Working with Children Check Guidelines (NSW Office of the Children's Guardian)**
- **Privacy Act 1988 (Cth)** – Including provisions for managing personal information related to children.
- **Crimes Act 1900 (NSW)** – Particularly in relation to mandatory reporting of child abuse and neglect.
- **Australian Government DFAT Child Protection Policy** – Where applicable for programs supported by DFAT funding.
- **Australian Charities and Not-for-profits Commission (ACNC) External Conduct Standards** – Applicable to overseas child-related activities.

18.3 International Instruments and Agreements

BCDC aligns its safeguarding practices with globally accepted human rights and child protection standards, including:

- United Nations Convention on the Rights of the Child (UNCRC)
- International Labor Organization (ILO) Convention No. 182 on the Worst Forms of Child Labor
- Core Humanitarian Standard on Quality and Accountability (CHS)
- ACFID Code of Conduct – Including requirements for child safeguarding policies, risk assessments, and child-safe programming.
- Sphere Standards and Minimum Standards for Child Protection in Humanitarian Action (CPMS) – Relevant for emergency contexts.

19. CONCLUSION

BCDC is committed to ensuring the safety, dignity, and rights of all children who interact with its programs, personnel, and partners. This policy reflects BCDC’s organizational values and provides a comprehensive framework to prevent harm, respond appropriately to concerns, and promote a child-safe environment across all levels of operation.

Upholding this policy is a shared responsibility – requiring awareness, vigilance, and integrity from every individual affiliated with BCDC. Through continuous learning, transparency, and accountability, BCDC strives to be a trusted and protective presence in the lives of children.

REFERENCES

1. Australian Council for International Development (ACFID). (2023). ACFID Code of Conduct.
2. Australian Council for International Development (ACFID). (2022). Quality Assurance Framework.
3. Sphere Association. (2018). The Sphere Handbook: Humanitarian Charter and Minimum Standards in Humanitarian Response.
4. Alliance for Child Protection in Humanitarian Action. (2019). Minimum Standards for Child Protection in Humanitarian Action (CPMS).
5. United Nations General Assembly. (1989). Convention on the Rights of the Child (UNCRC).
6. International Labour Organization (ILO). (1999). Convention No. 182: Worst Forms of Child Labour Convention.
7. Australian Government – Department of Foreign Affairs and Trade (DFAT). (2017). Child Protection Policy.
8. New South Wales Government. (1998). Children and Young Persons (Care and Protection) Act 1998 (NSW).
9. New South Wales Government. (2012). Child Protection (Working with Children) Act 2012 (NSW).
10. Office of the Children’s Guardian (NSW). (n.d.). Working With Children Check Guidelines.
11. Australian Government. (1988). Privacy Act 1988 (Cth).
12. Australian Government. (1900). Crimes Act 1900 (NSW).
13. Australian Charities and Not-for-profits Commission (ACNC). (2018). External Conduct Standards.
14. Burmese Community Development Collaboration (BCDC). (2025). BCDC Code of Conduct.
15. Burmese Community Development Collaboration (BCDC). (2025). BCDC Complaints Handling Policy.
16. Burmese Community Development Collaboration (BCDC). (2025). BCDC Financial Wrongdoing Policy.
17. Burmese Community Development Collaboration (BCDC). (2025). BCDC Volunteer Manual.