



Title: Child Protection & Safeguarding Vulnerable Adults Policy	Version: 1
Type: Board	Adoption/revision date: March 2023
Next reviewed: February 2025	Monitored by: People & Culture

1. Policy

1.1 Policy statement

Open Doors Australia and New Zealand (Open Doors) is committed to the safety and welfare of all children and vulnerable adults in all aspects of its work. The protection of children and vulnerable adults from harm and the promotion of their welfare is fundamental to our belief that every human being is created in God’s image. Open Doors takes these responsibilities seriously and seeks to ensure that as an organisation we reflect our biblical values and create safe environments.

The purpose of this policy is to inform all staff and volunteers of their obligations in keeping children and vulnerable adults safe and minimising the risk of harm by those covered under the scope of this policy.

1.2 Development of contextualised policies

Open Doors Australia and New Zealand is part of a global Open Doors International network. All Open Doors International entities adhere to the global ‘Safeguarding and protection of vulnerable adults and children’ policy. Open Doors is responsible for the development, implementation and periodic review of safeguarding policies, to be consistent with the standards outlined in the global document and in accordance with legislation and the local context in Australia and New Zealand.

1.3 Scope

This policy applies to:

- Open Doors board members
- Open Doors staff, including managers and supervisors; full-time, part-time or casual, temporary or permanent staff; student placements, apprentices,
- Open Doors contractors, sub-contractors
- Open Doors volunteers.

1.4 Statement of Intent

This policy:

- promotes an understanding of protection needs and effective processes that reduce the risk of harm and exploitation by those included in its scope. The policy also stresses a responsibility to report and respond to concerns of abuse, and for those experiencing and/or re-experiencing abuse or affected by working with abused people, to be supported in every way practicable to protect them from risk or further harm.
- seeks to ensure, through risk mitigation, a vital and enduring reputation of the ministry.
- seeks to ensure that our organization undertakes its responsibilities regarding the protection of vulnerable adults and children and will respond to concerns appropriately.
- clarifies the organisation’s expectations, so that this becomes embedded in our work; promoting good practice and preventing and minimising risk and harm. Open Doors will undertake all reasonable measures to ensure sufficient resources (time and funding) are allocated so that the policy can be effectively implemented.

2. Policies and Responsibilities

2.1 **Application of policy:** Open Doors equips all employees, interns, volunteers, and board members to understand and perform their safeguarding responsibilities and obligations. Open Doors also applies appropriate standards to external parties, including visitors, community volunteers, contractors, partners,

and others affiliated with partners or contractors, to address safeguarding risks relating to their engagement with the work of Open Doors.

- 2.2 **Awareness:** All Open Doors employees, volunteers, interns, and board members sign an acknowledgement that they know, understand and will follow this policy.
- 2.3 **Training:** All individuals covered by the scope of this policy receive safeguarding training at the start of their employment or engagement with Open Doors. Employees and volunteers receive periodic refresher training at least once every two years.
- 2.4 **Safeguarding Officer:** It is the responsibility of the Safeguarding Officer to act on behalf of Open Doors in dealing with allegations or suspicions of neglect or abuse, including referring the matter to the statutory authorities where required. The Safeguarding Officer at Open Doors is the People & Culture Manager.
- 2.5 **Reporting:** All individuals covered by the scope of this policy in receipt of allegations or with reasonable grounds to suspect abuse should report concerns as soon as possible to the Safeguarding Officer.

3. Safeguarding Behaviour

Open Doors individuals covered by the scope of this policy, behave in ways that protect children and vulnerable adults, prevent sexual exploitation and abuse, and prevent any other intentional or unintentional harm to the people Open Doors serves or works amongst. Rules of behaviour are based on local and culturally appropriate interactions (provided these meet or exceed the minimum protocols below) with children and other vulnerable adults.

Open Doors employees:

- create and maintain an environment which prevents sexual exploitation and abuse of children and vulnerable adults and promotes the implementation of these behaviours;
- treat children and vulnerable adults with respect regardless of race, colour, gender, religion, political or other opinion, national ethnic or social origin, property, disability, birth or other status.
- are careful about perception and appearance in their language, actions and relationships with children and vulnerable adults. Their behaviour—including in person and on digital platforms, both online and offline—demonstrates respect for children and vulnerable adults and their rights;
- not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate and will not use physical punishment on children.
- ensure that all physical and online contact with children and vulnerable adults is appropriate in the local culture;
- where possible and practical, follow the ‘two adult’ rule while conducting Open Doors work, where two or more adults supervise all activities that involved children, and are visible and present at all times;
- accept responsibility for personal behaviour and actions as a representative of Open Doors;
- comply with safeguarding related investigations (internal and external) and make available any documentary or other information necessary for the completion of the investigation;
- comply with applicable data privacy laws and with relevant Open Doors data privacy and information security policies, when handling any personal data about individual children or adults;
- immediately report to the Safeguarding Officer any known or suspected safeguarding incident or breach of this policy.

3. Recruitment and selection of staff and volunteers

- 3.1 **Screening:** Open Doors takes diligent measures to screen out all people who might seek to Use Open Doors to harm children or vulnerable adults, or whose past actions indicate an unacceptable risk of such harm. These measures include interviews and reference checks. Screening measures are applied to all candidates for employment, board members, volunteers, interns and individual contractors.
- 3.2 **Identity and background checks:** Candidates for employment, board members, volunteers, and interns—as well as relevant personnel of contractors and partners—have an identification check and an appropriate criminal record/police background check, to the extent permitted by law, prior to employment or engagement with Open Doors, and periodically thereafter as required by law or appropriate for the context. People with a prior conviction for any crime against children or sexual exploitation or abuse against an adult are not hired or engaged by Open Doors, to the extent permitted by applicable law, and in any case will not be placed in a position with access to children or adult beneficiaries, or to their personal data.

In roles where contact with children is more than incidental in the course of the work, valid Working With Children's Checks (or similar) are also required.

4. Communications, Social Media and Digital Technology

- 4.1 **Dignity:** Open Doors takes care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a subject, and Open Doors ensures images are honest representations of the context and the facts. In all forms of communication, children and adults are treated and portrayed with dignity and not as helpless victims or in sexually suggestive poses.
- 4.2 **Consent:** Children or adults who are primary subjects of text, photo and/or video resource gathering by Open Doors employees must provide informed consent. Informed consent means the subject has a general understanding of the purpose of the reporting or photography, and gives verbal or written permission thereof. If the primary subject is a child, written consent is also collected from the parent, guardian, or other legally required entity or individual. In the following situations, written consent is collected from the child (as appropriate for age) or adult
- 4.3 **Prevention of harm in communications:** Open Doors is committed to storytelling that raises awareness of and promotes the support of children and adults suffering persecution. Open Doors is committed to preventing harm to those we seek to serve.

5. Visits to Open Doors field countries

- 5.1 **Visitors:** Visitors subject to this policy include people going to on Open Doors field programme. This includes supporters, donors, and other delegations from Development Offices invited by Open Doors.
- 5.2 **Visit preparations:** Visits to field programmes by all employees, supporters and other invited delegations should be approved by Open Doors. National Criminal History/Police Background checks should be conducted for all potential travellers prior to any field visit, where permitted by law.
- 5.3 **Visitor orientation to safeguarding:**
- All visitors to the field who are not Open Doors employees or volunteers are briefed on Open Doors' Safeguarding Behaviours and a required to sign a Child Protection & Safeguarding Agreement prior to travelling.
 - The hosting field office provides a brief orientation to any distinctive safeguarding behaviours that apply in that context, as well as local customs regarding interaction with children and vulnerable adults.
 - Non-employee or Board visitors are accompanied by an Open Doors employee when visiting field programmes.

6. Safeguarding Incidents and Reporting

6.1 **Reporting:** All Open Doors employees and volunteers are responsible and obligated to report any suspicions of child or vulnerable adult abuse (or other safeguarding concerns, including any violations of this Policy) that is connected to Open Doors or its programmes.

Reports can be made by Open Doors employees or volunteers in the following ways:

- Contact the CEO, Board Chair, Executive Team member or the Safeguarding Officer (People & Culture Manager).
- If confidentiality is preferred, or if the above option is not available for whatever reason: Use the Open Doors Whistleblowing Form on the Open Doors Australia website <https://www.opendoors.org.au/whistleblower-disclosure-form/>

6.2 **Reporting to Authorities:** Open Doors will ensure that all child protection concerns and complaints will be reported to the relevant government departments and, if necessary, the Police as soon as possible in accordance with legislative duties.

6.3 **Responding to safeguarding concerns:** Open Doors will respond to all safeguarding concerns raised in accordance with the *Procedure for Responding to Safeguarding Concerns* (Appendix 1).

6.4 **Disclosure:** Whilst Open Doors maintains appropriate confidentiality for individuals in Safeguarding Incidents, Open Doors may disclose information about incidents when lawfully permitted, in order to support the prosecution of suspected criminal activity, meet donor and regulatory requirements, support learning and accountability, advocate to prevent future incidents, or as required by law.

Information in ongoing investigations of Safeguarding Incidents, and information about past incidents, is shared only on a 'need to know' basis, as deemed necessary by the Safeguarding Officer and CEO.

7. Disciplinary Action

Failure to follow the Open Doors Child Protection/Safeguarding Policy, or other inappropriate behaviour towards children or vulnerable adults, or failing to report a known or suspected safeguarding incident committed by an Open Doors employee, is grounds for discipline, up to and including termination of employment.

8. Definitions

Abuse: A selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of authority. Those inflicting harm or those who fail to act to prevent harm can cause this. Abuse is not restricted to any socio-economic group, gender or culture. Re-exploitation includes not attempting to stop or avoid such conduct.

Abuse can take a number of forms, including but not limited to the following:

- Physical abuse
- Sexual abuse
- Emotional and psychological abuse
- Re-exploitation and re-traumatization
- Neglects and acts of omission
- Financial (or material) abuse
- Discriminatory abuse

Our organisation also recognises spiritual abuse, which can include misuses of authority in the name of the church or in the name of Jesus. It can happen in cases where religious and ministry leaders use their so-called 'god given' authority to coerce or manipulate people into certain behaviour that violates their free will and personal standards.

Child: Any person below the age of 18.

Child protection: All measures taken to prevent and respond to abuse, neglect, exploitation and all other forms of violence against children.

Contractor: Open Doors regularly contracts with non-employee individuals and organisations to perform services for Open Doors. These non-employee individuals and organisations may also be referred to as 'independent contractors', 'consultants', or 'vendors', and are referred to in this document as 'Contractors'.

'Reasonable grounds to suspect' is a situation where a person has some information that leads them to believe that abuse, neglect or exploitation has taken place, is taking place or may take place. It comes with a low burden of proof (in fact, no proof is needed at all), but is based on some information.

Questions that may help a person to determine whether they have 'reasonable grounds to suspect' might include:

- Could you explain to another person why you suspect something? This helps to make sure that your suspicion is based on information, even if you have no proof.
- Would an objective other person, with the same information as you, come to the same conclusion? This helps to make sure that your suspicion is as objective as possible.

Safeguarding: Preventing, reporting and responding to harm or abuse of children or vulnerable adults by Open Doors employees and volunteers.

8.1 **Safeguarding Officer:** The person responsible for acting on behalf of Open Doors in dealing with allegations or suspicions of neglect or abuse, including referring the matter to the statutory authorities where required. The Safeguarding Officer at Open Doors is the People & Culture Manager.

Survivor-centric approach means considering and lawfully prioritising the needs, rights and wishes of survivors that reflects our desire to protect those experiencing abuse from further harm.

Vulnerable Adult: A vulnerable adult is a person aged 18 years or over who may be unable to care for or protect themselves from harm or from being exploited. This may include characteristics related to gender, forced displacements, impaired intellect, old age or frailty, mental incapacity, learning or physical disabilities. In addition, those deemed at risk and who are unable or unwilling to identify themselves as vulnerable or subject to abuse as a result of disasters and conflict.

Volunteer: A person who is neither employed by Open Doors nor legally obliged to work for Open Doors but who on free will and without expectation of payment or other remuneration, contributes their time, skill, knowledge, efforts and expertise to the work of Open Doors.

9. Related policies and procedures

Employees are encouraged to read this policy in conjunction with other relevant Open Doors policies, including:

- Safeguarding and protection of vulnerable adults and children (ODI)
- Bullying and Harassment Policy
- IT Usage Policy
- Whistleblowing Policy
- Grievance Policy
- Managing Performance, Misconduct and Discipline Policy

10. Related legislation, regulations and standards

Relevant standards and legislation includes, but is not limited to:

- *United Nations Convention of the Rights of the Child*

- *Child Safe Standards*
- *Children's Guardian Act 2019 (NSW)*
- *Child Protection (Working with Children) Act 2012 (NSW)*
- *Child Protection (Working with Children) Regulation 2013 (NSW)*
- *Crimes Act 1900 (NSW)*
- *Disability Inclusion Act 2014 (NSW)*
- *Anti-Discrimination Act 1977 (NSW)*
- *Worker Screening Act 2020 (VIC)*
- *Child Protection Act 1999 (QLD)*
- *The Children's Act 2014 (New Zealand)*

11. Appendix 1

Procedure for Responding to Safeguarding concerns

Open Doors will follow this procedure for all safeguarding incidents. As part of our commitment to the safety and welfare of all children and vulnerable adults, we will follow a survivor-centric approach that reflects our desire to protect those experiencing abuse from further harm.

At any time during this process, if there is suspicion of imminent harm to a person, contact the police on 000. Open Doors may refer the incident to the police or relevant criminal judicial authority at any point.

Phase One: Forming a suspicion

The *Child Protection & Safeguarding Vulnerable Adults Policy* defines 'reasonable grounds to suspect' an incident and creates a requirement for managers, staff, volunteers and third parties to report that suspicion.

Failure to report instances, allegations, disclosures or concerns about safeguarding will be viewed as a serious matter that may, depending on the circumstances, result in disciplinary action or dismissal.

Phase Two: Reporting a suspicion

The policy creates two means by which someone may report a suspicion:

Reports can be made by Open Doors employees or volunteers in the following ways:

- Contact the CEO, Board Chair, Executive Team member or the Safeguarding Officer (People & Culture Manager).
- If confidentiality is preferred, or if the above option is not available for whatever reason: Use the Open Doors Whistleblowing Form on the Open Doors Australia website <https://www.opendoors.org.au/whistleblower-disclosure-form/>

The person receiving the report of a suspicion must notify the Safeguarding Officer (a role defined in the safeguarding policy), who will be responsible for managing the incident.

When receiving a report:

- Use active listening, be calm, supportive and reassuring with any potential victim or witness. Concentrate on making the person providing information feel that they are doing the right thing and that you are there to help them.
- Explain what you will do with the information.
- Explain that you are required to pass the information to Open Doors and that Open Doors will take the matter seriously.
- Get as much information as possible from the source of the concern, if appropriate in the circumstances.

When receiving a report, do not:

- Make promises to any person, except to say that Open Doors will take the matter seriously.
- Investigate the matter yourself.

- Disclose the information to people other than those you are required to tell.
- Approach the suspect about the incident, challenge the suspect or share information about the incident with the suspect.
- Make judgements about the validity, credibility or veracity of the information.

Phase Three: Managing Open Doors’ response to a suspicion

- I. Upon being notified of the incident, the Safeguarding Officer will:
 - Ensure that all people, especially any survivor, are safe;
 - Seek further information to help make decisions
 - Initiate a rule that states the information will only be made available to people who need to know.
 - If there is suspicion of imminent physical harm, including sexual abuse, notify the police immediately.

- II. The Safeguarding Officer will convene an Incident Committee to work with them to resolve the incident. The members of this committee will include the CEO, Finance & Risk Manager and other executive or directors as required.

The purpose of the Committee is to provide accountability and guidance to the Safeguarding Officer, as well as knowledge and experience across different areas of Open Doors to help successfully manage an incident.

All incidents require investigation. If a matter has not been referred to the police then, depending on the nature of the matter, the Incident Committee will be guided by the principles of independence and competence:

- What is the best way to carry out an internal investigation independently and objectively?
- What resources are available, internally or externally, to carry out an investigation to the correct level of competence and fairness?

During the course of this plan, survivors must receive support from Open Doors. This support must make the survivor feel safe and feel that their needs are being prioritised.

Similarly, any person under suspicion must be treated lawfully and with due regard for their own safety, security and needs.

In both cases this includes providing the person with updates, keeping in mind the need for confidentiality.

Phase Four: Taking action following a suspicion

- I. The Incident Committee will consider the outcomes following an investigation. Possible outcomes may include:
 - No further action
 - Disciplinary action
 - Seeking criminal prosecution, civil action or referral to law enforcement.

- II. The Incident Committee will be responsible for meeting any obligations to report to an external body.

- III. Following every incident, Open Doors will document the lessons learned with the aim of improving the way it manages incidents. This will take a holistic approach, framed by the following questions:

Phase Five: Concluding the response to a suspicion

To close an incident, the Safeguarding Officer must be satisfied that:

- 1) There are records of the incident that show:
 - How the incident arose and how it was handled
 - The details of the original concern and other relevant information;
 - The details of the decisions that were made
 - The evidence collected
 - The details of the actions taken
 - External reporting of the incident (if required).
- 2) Lessons have been documented and used to improve the way Open Doors manages incidents in the future.