

CBM AUSTRALIA POLICY SAFEGUARDING POL_008

Table of Contents

Document Approval and Review	1
Purpose and Scope.....	1
Principles.....	2
Key Definitions	3
Risk Management.....	4
Recruitment and Training	4
Safeguarding in CBM Australia’s Program and Advisory work.....	5
Safeguarding in CBM Australia’s use of images and resources.....	6
Reporting and investigation	6
APPENDIX 1	8

Document Approval and Review

Approved by: CBM AUSTRALIA BOARD

Maintained by: CHIEF OPERATING OFFICER

Approval date: MARCH 2026

Review date: MARCH 2029

Purpose and Scope

This policy will apply to activities and operations of CBM Australia, at all times. CBM Australia representatives, including workplace participants, and partners are expected to comply with the principles and reporting expectations outlined in this policy. Workplace participants includes employees, contractors including associates, interns, volunteers, and Board members.

Safeguarding is a broad term that CBM Australia uses to describe the organisation’s policies, procedures and practices designed to prevent and protect all people who come into contact with its programs, people, and operations. CBM Australia is committed to protecting people from all forms of harm and abuse, including child exploitation and abuse and sexual exploitation, abuse and harassment (SEAH) caused by CBM Australia workplace participants, partners, operations or programs.

CBM Australia acts on the basis that a child is any person under the age of 18, irrespective of other definition, and an adult is any person 18 years of age or older.

This policy sets out CBM Australia's commitment to uphold the highest standards of behaviour and integrity to actively prevent incidents of abuse, exploitation and harassment. Where concerns, allegations or known incidents are reported, the organisation is committed to survivor centred and participatory responses that align with the rights, wishes and best interests of the victim-survivor.

CBM Australia seeks to maintain an organisational culture that prioritises safeguarding against child exploitation and abuse and SEAH. This is a priority of the highest order in both our domestic activity and our international activities. This Policy is part of continuously elevating our safeguarding efforts on all fronts and should be read alongside CBM Australia's suite of Safeguarding Procedures and the CBM Global Safeguarding Policy.

CBM Australia is committed to safeguarding children and adults from harm in all aspects of its work. We have zero tolerance for child exploitation, abuse and harm, and for sexual exploitation, abuse and harassment (SEAH), as well as zero tolerance for inaction to prevent, report or respond to these risks. CBM Australia believes that every child has the right to survival, development, protection and participation, as affirmed in the United Nations Convention on the Rights of the Child, and every person has the right to live free from SEAH.

CBM Australia takes its duty of care seriously, including responding promptly and appropriately to reports and complaints, and aims at all times to provide the safest possible programs, environments and workplaces for all people.

Principles

This policy is underpinned by the seven principles outlined in the Australian Government's Department of Foreign Affairs and Trade (DFAT) Child Protection and Protection from SEAH Policies.

1. **Zero tolerance for harm and inaction:** Child abuse and SEAH are never acceptable to CBM Australia. CBM Australia does not tolerate harm of any kind.
2. **Victim-survivor needs are prioritised:** CBM Australia maintains a 'do no harm' approach, prioritising the rights, needs, wishes and best interests of the victim-survivor, while ensuring procedural fairness for all parties.
3. **Promote inclusion and equity and recognise diversity:** CBM Australia particularly recognises that gender, disability, age and poverty have powerful intersection with the likelihood of child exploitation, abuse and SEAH. Women and children with disability in poor communities have the highest risk of experiencing child exploitation, abuse and SEAH. CBM Australia actions aim to create safe environments that promote gender equality, child protection, accessibility, social inclusion, and accountability as part of a 'do no harm' approach.
4. **Prioritise prevention:** CBM Australia recognises that all organisations, including those in any partnership or other connection with CBM Australia, have a collective responsibility to build capacity to proactively promote the safety of children and vulnerable adults in all contexts.

Actions to promote safety and deal sensitively and effectively with child exploitation, abuse and SEAH are set out in policies and procedures and embedded in daily operations.

5. **Adopt an empowering and participatory approach:** CBM Australia, through our partners, empowers children and adults to understand their rights, express concerns and participate in decisions affecting them in ways that are age-appropriate, voluntary and safe. CBM Australia works to promote the safety and wellbeing of all participants in CBM Australia activities.
6. **Reporting incidents is mandatory:** CBM Australia sees preventing child exploitation, abuse and harm and SEAH as core obligations of CBM's work. CBM Australia supports strengthened reporting mechanisms to better monitor child exploitation, abuse and SEAH; understand risks; and improve both systems and assurance. CBM Australia is committed to ensuring that those who raise concerns are protected from retaliation and that all concerns, allegations and incidents are addressed effectively and in a timely and appropriate way. In this, CBM Australia is accountable to DFAT, to the Australian Council for International Development (ACFID), to all other stakeholders and to all domestic and international communities that connect with CBM Australia.
7. **Embed Safeguarding into organisational culture and leadership:** CBM Australia leadership, Board and Management, set clear expectations, model respectful behaviour and seek to improve diversity and inclusion. CBM Australia Board and Management invest appropriate resources to support continuous review of organisational policies and practices.

Key Definitions

CBM Australia adopts Safeguarding definitions contained in the DFAT Child Protection and Protection from Sexual Exploitation, Abuse and Harassment Policies, accordingly.

Child or children: a person below the age of 18.

Child abuse: includes physical abuse, emotional abuse, ill treatment, neglect and online or digital abuse. It also includes a child or children witnessing such abuse against another child or adult.

Child exploitation: refers to one or more of the following actions:

- 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
- Using a child for profit, labour, sexual gratification, trafficking, forced labour, or any other personal or financial advantage.

Harm: refers to 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.

Sexual exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially or politically from sexual exploitation of another.

Sexual abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual offences including but not limited to: attempted rape (which includes attempts to force someone to perform oral sex); and sexual assault (which includes non-consensual kissing and touching). All sexual activity with someone under the age of consent (in the law of the host country or under Australian Capital Territory law [16 years], whichever is the greater) is considered to be sexual abuse.

Sexual harassment: A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favours, or engages in other unwelcome conduct of a sexual nature, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person would be offended, humiliated or intimidated. Sexual harassment can be obvious or indirect, physical or verbal, repeated or one-off and perpetrated by any person of any gender towards any person of any gender.

Victim-survivor: a term used to describe a person who is, or has been, abused, exploited or harmed. 'Victim-survivor' acknowledges both the harm suffered (victim) and the resilience or agency of the person in coping with the aftermath (survivor). This term emphasises a supportive, rights-based approach to addressing their needs and upholding their dignity throughout the reporting and response process.

Risk Management

CBM Australia aims to build a positive risk culture by ensuring that risk management is embedded in a range of key practices across the organisation including strategy development, annual operational planning, project planning and performance planning. These processes, described in the organisation's Risk Management Framework, integrate the identification, assessment and management of the distinct risks related to child exploitation, abuse and harm and SEAH. Intersecting issues are also considered, appropriate to context; for example, in relation to prevention of modern slavery.

CBM Australia integrates disability-, gender- and power-informed context analyses across all stages of our program work to understand how intersecting inequalities and local dynamics create specific safeguarding and SEAH risks, ensuring prevention and mitigation measures are inclusive, rights-affirming and grounded in the lived experience and leadership of those most affected. Risks are recorded in appropriate risk registers that identify mitigation actions, responsible persons and timeframes for implementation.

This framework describes the key roles and responsibilities in relation to risk management at all levels. It includes processes for regular Executive and Board oversight of risks and supports proactive escalation as context changes.

Recruitment and Training

CBM Australia ensures that all recruitment, including of volunteers, contractors and consultants, includes reference and background checks. CBM Australia's commitment to safeguarding children and vulnerable adults is communicated to candidates throughout the recruitment process.

CBM Australia will not hire or engage any person with a history of perpetrating child exploitation, abuse and harm or SEAH in any form or who is otherwise not safe or suitable to work with or be in contact with children or vulnerable adults.

All CBM Australia workplace participants are required to sign the organisation's Code of Conduct and Safeguarding Commitment on commencement. CBM Australia conducts annual training, in the most appropriate form for particular cohorts, to build awareness, understanding and engagement with safeguarding and the prevention of SEAH relevant to their role. This includes refreshment of individual commitment to the CBM Australia Safeguarding Commitment. Each Commitment signatory is expected, upon becoming aware, to immediately report any concern, suspicion or allegation of SEAH or any breach of this Policy to the organisation's Safeguarding Focal Person.

All employment contracts and other workplace participant agreements include the provision for disciplinary action up to and including dismissal for serious misconduct, including matters involving breaches of the Safeguarding Policy, Safeguarding Commitment or Code of Conduct.

Additional measures are in place for roles assessed as likely to involve contact with children or vulnerable adults through the organisation's activities. These include behavioural and safeguarding focused questions in interviews and referee checks as appropriate to the role.

CBM Australia maintains an appropriate Discrimination, Bullying and Harassment Standard, and other equal employment and diversity provisions in accordance with legislation. Further relevant internal Standards and Procedures are available to employees on the CBM Australia intranet.

Safeguarding in CBM Australia's Program and Advisory work

In accordance with DFAT requirements and international good practice, CBM Australia works closely with CBM Global Country teams to ensure the standards set out in the CBM Global Safeguarding Policy are applied across all areas of CBM Australia's program and advisory work.

CBM Australia works with CBM Global Country Teams to support partners as they develop their Safeguarding practices.

CBM Australia seeks to strengthen risk-based approaches that help prevent safeguarding incidents while also supporting partners to strengthen compliant and reporting mechanisms that enable effective survivor centred and trauma informed responses.

CBM Australia ensures that CBM Global Country Teams overseeing CBM Australia programs are supported by a Safeguarding Focal Person responsible for supporting best practice and coordinating safeguarding and PSEAH training, risk assessment, incident management and reporting systems.

Safeguarding in CBM Australia's use of images and resources

CBM Australia works closely with all CBM Global entities to ensure that all images and resource content collected and published by CBM Australia meet all required standards including those set by ACFID, DFAT and the Fundraising Institute of Australia. CBM Australia has measures in place to ensure that all images and resources carry the free, prior and informed consent of those portrayed.

Procedures related to collection and publication ensure that children and adults are represented in their true social context in a dignified way; that their participation is not exploitative and that resources created in any medium are not used beyond agreed purpose and consent.

Any CBM Australia representative may only capture or use images or other resource content, through any media, of a child or adult, which have been appropriately created and obtained. Any such representative is required to sign the CBM Australia Safeguarding Commitment and participate in safeguarding briefings and or training appropriate to their role. Together these measures support CBM Australia's commitment to do no harm through its use of images and resources.

Reporting and investigation

CBM Australia works closely with CBM Global Country Teams and the CBM Global Safeguarding Manager to ensure that reporting and incident management procedures are in place and are responsive to the different needs of children and adults who report safeguarding concerns related to CBM Australia's programmatic or advisory work.

For safeguarding reports related to CBM Australia workplace participants or representatives in Australia or overseas, CBM Australia has appropriate reporting and investigation systems in place that support implementation of this Policy.

CBM Australia's processes for managing safeguarding reports, outlined in the organisation's Safeguarding Reporting and Investigation procedure, hold these principles as fundamental at all times:

- a. CBM Australia will ensure a survivor centred and trauma informed approach that protects and respects the safety, dignity, rights, wishes and welfare of the victim-survivor throughout all phases of reporting, investigation, provision of assistance, and/or provision of referral pathways. Where the victim-survivor is a child, CBM Australia will seek to act in their best interest through each of these phases.
- b. CBM Australia will ensure that all response and investigation processes are transparent, timely, confidential and underpinned by procedural fairness. CBM Australia commits to communicate clearly and appropriately with all parties throughout the reporting and investigation process.
- c. CBM Australia will work with partners and CBM Global to ensure all funded programs include community-based complaints mechanisms and reporting processes that are locally designed, transparent, accessible and well-publicised.

- d. All CBM Australia partners, workplace participants and consultants have a responsibility to immediately raise safeguarding concerns. It is expected that concerns will be first raised in the country where the safeguarding incident is believed to have occurred and where necessary reported to DFAT within 24 hours.
- e. CBM Australia encourages and supports reporting by victim-survivors and others outside the scope of this policy and avows a culture that deals with reporting swiftly and in line with this Policy. Reports can be made anonymously via CBM Australia's whistleblowing mechanism. CBM Australia's Whistleblowing Policy, POL_014, is reflected at <https://www.cbm.org.au/whistleblower-information/>.

CBM Australia will maintain a Safeguarding Focal Person who will work within CBM Australia and engage across CBM Global to support best practice in safeguarding and the prevention of SEAH.

The Board and management of CBM Australia are fully committed to the principles of this policy. Any breach of strategic significance or any material risk associated with this policy will be promptly reported to the Board as soon as practicable.

APPENDIX 1

CBM AUSTRALIA SAFEGUARDING COMMITMENT

Document Approval and Review

Approved by: CBM AUSTRALIA EXECUTIVE LEADERSHIP TEAM

Maintained by: CHIEF OPERATING OFFICER

Approval date: MARCH 2026

Review date: MARCH 2029

This Safeguarding Commitment lists behaviours expected of all CBM Australia workplace participants and any other representatives including project visitors. These behaviours are expected at all times, and in any location.

This Safeguarding Commitment encompasses behaviour towards **all** people, while naming in particular children and vulnerable adults. CBM Australia acts on the basis that:

1. a *child* is any person under the age of 18, irrespective of other definition; and
2. a *vulnerable adult* is:
 - a. Any person aged 18 years and older who may be at risk of abuse or exploitation due to their dependence or reliance on others for services, basic needs or protection, and according to context, for example, in humanitarian situations.
 - b. An adult may also be at risk / vulnerable when in a relationship (social or work) with another who seeks to misuse their position of authority or trust to control, coerce, manipulate or dominate them.
 - c. An adult may also be at risk if their decision-making capacity is impaired and/or they do not have the support to make a decision.

I agree:

1. To treat children and vulnerable adults in a manner which respects their rights, integrity and dignity and considers their best interests.
2. To create and maintain welcoming, inclusive, environments that are safe and empowering for children and vulnerable adults. This includes environments which prevent the abuse, exploitation and harassment of children and vulnerable adults.

3. Not to use language or behaviour that is abusive, including language or behaviour that is harassing, sexually provocative, intimidating, shaming, demeaning or culturally inappropriate.
4. Not to seek or develop any form of sexualised relationship or engage in any form of sexual activity (including payment for sexual services) with any child.
5. Not to seek or develop any form of sexualised relationship with any adult beneficiary associated with CBM.
6. Not to request any service or favour from any child or vulnerable adult, or give preferential treatment, that could be considered abusive or exploitative.
7. When on deployment with CBM Australia, not to seek or engage in transactional sex; including payment of any person for sexual services provided by any person.
8. Not to condone or participate in any behaviour with children or adult beneficiaries which is illegal, unsafe, physically punishing or otherwise abusive; including consumption or supply of alcohol or illicit drugs, and including harmful traditional practices, spiritual or ritualistic abuse.
9. Wherever possible, to ensure that another adult is present when in contact with children (not being children related to me).
10. For unaccompanied child beneficiaries or children I am only associated with because of CBM, not to offer or provide private transportation and not to take into private residences or sleep in the same room; unless absolutely necessary for the safety of the child/ren.
11. To comply with all relevant Australian and otherwise local laws. This includes labour laws in relation to child labour, and I further agree that children are not to be hired for domestic or other labour which is inappropriate given their age or developmental stage.
12. To use all computers, mobile phones, cameras or other technology in a manner that promotes safeguarding, and never exploit or harass children or vulnerable adults, nor access or disseminate sexually exploitative material through any media.
13. To respect the privacy and confidentiality of children and vulnerable adults associated with CBM; and never share or seek personal contact details or have unsupervised contact without appropriate authorisation.
14. To immediately report any concerns, suspicions, incidents or allegations of actual or potential abuse, exploitation or harassment; in accordance with applicable laws, standards and CBM procedures.
15. To immediately disclose any charges, convictions and other outcomes of an offence that relates to abuse or exploitation which occurred before or occurs during my association with CBM Australia.

When capturing or using images, through any media of a child or vulnerable adult, I will:

- a. take care to ensure local traditions or restrictions are adhered to;

- b. obtain informed consent, from the adult or from the child and their parent / guardian, using the CBM Australia provided consent form;
- c. provide a clear explanation of how the image/s will be used;
- d. not offer or give remuneration or in-kind gifts in exchange for the image/s;
- e. ensure the image/s, through any media, present children and vulnerable adults in a dignified and respectful manner, not in a sexualised manner, and adequately clothed (top and bottom);
- f. ensure the image/s, through any media, are honest representations of the context and the facts;
- g. ensure file labels, meta data, text descriptions or other elements do not reveal identifying information when sending or publishing in any form.

I....., acknowledge that I have read and understood the CBM Australia Safeguarding Policy and I will uphold this, my Safeguarding Commitment. I understand that breach of this Commitment will result in disciplinary action in accordance with the terms of my engagement with CBM Australia.

Signed:.....

Name:.....

Date:...../...../.....