

Quaker Service Australia (QSA) Child Safeguarding Policy

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1. Policy Statement and Overview

Quaker Service Australia (QSA) is unequivocally committed to upholding the safety, rights, and wellbeing of all children, and has a zero tolerance of any form of child exploitation, abuse and harm. This commitment extends to always ensuring a safe and positive environment for children within all aspects of our work. QSA supports partners who demonstrate equivalent standards in their own working environment.

Child exploitation, abuse and harm are direct forms of violence, and oppositional to Quaker testimonies and values. We recognise beyond this, a violation of children's rights is an abuse of power that causes profound and long-term harm to individuals, families and communities. Forms of exploitation, abuse and harm may include physical abuse, sexual abuse, emotional abuse, neglect, trafficking, child labour, child marriage and female genital mutilation, or situations where a child is a witness to any of the above. Exploitation and abuse can also occur online.

QSA recognises the United Nations Convention on the Rights of the Child (1989), and in our work upholds Australia's commitment as a signatory to Convention on the Rights of the Child (UNCRC). This includes taking proactive measures to prevent, identify and respond to safeguarding risks. QSA follows the key principles and related standards of the Commonwealth Child Safe Framework and the National Principles for Child Safe Organisations and is aligned with the ACFID Code of Conduct and DFAT's Child Protection Policy.

2. Purpose

The purpose of this policy is to establish QSA's approach for safeguarding children across all areas of our work, ensuring that all **QSA People** (see 3. *Scope* for a definition) proactively prevent, identify, and respond to child abuse, exploitation, and harm. The policy:

1. provides clear guidance on QSA's responsibility to safeguard children and prevent, mitigate, and respond to exploitation, abuse, and harm across all QSA work and partnerships
2. sets out expected behaviours for all QSA People when interacting with children, in alignment with QSA's Code of Conduct and project visit protocols
3. embeds a risk-based and intersectional **system** to child safeguarding, recognising how context, gender, race, disability, socio-economic status, and other power dynamics factors shape vulnerability
4. ensures strong monitoring, reporting, and accountability systems, including safe and accessible reporting channels that protect people from potential retaliation or further harm
5. requires timely reporting and effective responses to all concerns, incidents, allegations, or suspicions of child exploitation, abuse, or harm, prioritising child rights and wellbeing
6. promotes a culture of prevention, transparency, accountability, compliance with relevant legislation, and continuous improvement in safeguarding practices across all QSA activities.

3. Scope

This policy applies to all **QSA People** involved in any aspect of QSA's organisational or project activities. It covers all settings where QSA-related work occurs, including on-site, off-site, remote, after-hours duties, work-related social functions, conferences, training, monitoring visits, and field travel—wherever and whenever QSA People may be present because of their QSA responsibilities.

QSA People include the following groups:

QSA Staff:

Individuals engaged by QSA in any employment or work-related capacity, including full-time, part-time, casual, temporary or permanent employees; contractors and consultants; interns, volunteers, trainees, secondees, agency or labour-hire personnel; and individuals engaged in recruitment processes such as job applicants or candidates.

QSA Representatives:

The QSA Board and company members, and all persons formally appointed or authorised to represent QSA or conduct work on its behalf. This includes subcommittee members, volunteers acting in a representative capacity, and any other individual undertaking duties for QSA, regardless of the funding source of the activity.

QSA Partners:

All staff, community workers, and volunteers who are directly involved in QSA-funded project activities and operations, whether based in Australia or overseas.

This policy primarily covers harm to children resulting from the actions or activities of QSA staff, partners and representatives. Where appropriate, QSA may also support partners to respond to reported or suspected harm caused by others in the communities where we work, including by providing advice, referral options and reporting guidance to relevant authorities.

4. Definitions

Child, Children or Youth: QSA defines child or youth as any individual under the age of 18 years.

Child Abuse: includes physical abuse, emotional abuse, sexual 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: Includes one or more of the following:

- committing or coercing another person to commit an act of abuse against a child;
- possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material;
- committing or coercing another person to commit an act of grooming or online grooming;
- or using a child for profit, labour, sexual gratification, trafficking, forced labour, or any other personal or financial advantage.

Child Protection: Activities or actions that prevent and respond to harm, including abuse or exploitation, affecting children.

Child Safeguarding: promoting child safety and reducing the risks of harm to children within all QSA related work. Aligned to our overall safeguarding and risk minimisation approach we take proactive measures taken to avoid or minimise the potential negative impacts of QSA operations, project activities and programs on people and environments.

QSA People: see 3. Scope for full definition.

5. Guiding Principles

5.1 Zero Tolerance

QSA maintains zero tolerance for child exploitation, abuse and harm — and for inaction to prevent, report or respond to concerns.

5.2 Best Interests of the Child

All actions and decisions must prioritise children’s rights, safety and wellbeing, apply a ‘do no harm’ approach, and ensure responses are trauma-informed, child-centred and connected to support services.

5.3 Inclusion, Equity and Diversity

QSA is inclusive of all children regardless of circumstances or identity, and works to remove barriers to participation, safety, reporting and support.

5.4 Prevention First

QSA proactively prevents harm by embedding child safeguarding across policies, programs, recruitment, training and daily operations, in both physical and online settings.

5.5 Participation and Empowerment

QSA supports children to understand their rights, express concerns and participate safely and voluntarily in decisions affecting them, while actively engaging families and communities in promoting child safety.

5.6 Mandatory and Safe Reporting

Reporting concerns is mandatory. Mechanisms must be accessible (including to children), confidential, timely and protective of those who raise concerns.

5.7 Leadership and Culture

Safeguarding is embedded in QSA’s governance, leadership and organisational culture, supported by clear accountability, adequate resourcing and continuous review and improvement.

6. Risk Based Approach

Our Child Safeguarding policy applies a risk-based approach, ensuring that Child Protection Standards and operational practices are proportionate to risk and expected level of contact with children. Our standards and relevant procedures to be followed in relation to the defined level of risk according to Child Safeguarding responsibilities are fully detailed in Annex 1 to this policy.

7. Roles and Responsibilities

Role	Responsibilities
QSA Board	<ul style="list-style-type: none"> • Holds overall accountability for this Policy and its implementation. • Ensures organisational compliance with relevant Australian and/or local legislation. • Oversees reporting mechanisms, risk management processes, and safeguarding systems. • Reviews safeguarding performance and ensures adequate resourcing, training, and continuous improvement.
Child Safeguarding Focal Person	<ul style="list-style-type: none"> • Receives all child safeguarding concerns, reports, and allegations involving QSA People. • Initiates investigations, referrals, and mandatory reporting to relevant authorities. • Oversees organisation-wide compliance, monitoring, and implementation of safeguarding practices.
QSA Staff	<ul style="list-style-type: none"> • Adhere to this Policy, QSA Code of Conduct, and all safeguarding behavioural requirements. • Comply with mandatory reporting obligations and immediately report suspected or actual child harm or policy breaches. • Comply with relevant Australian and/or local legislation. • Hold and maintain required checks (WWCC, police checks, or appropriate alternatives) when roles involve direct, sustained, or significant contact with children. • Integrate child safeguarding into program design, due diligence, partner engagement, and risk assessments relevant to their role. • Ensure contracts, grants, and agreements include mandatory safeguarding clauses.
QSA Representatives	<ul style="list-style-type: none"> • Sign and adhere to QSA's Code of Conduct and Child Safeguarding-specific Code of Conduct (where relevant). • Comply with mandatory reporting requirements and promptly report any safeguarding concerns. • Comply with relevant Australian and/or local legislation wherever duties occur. • Provide appropriate screening checks when work involves children. • Follow all safeguarding controls, mitigation measures, and visitor/contractor protocols.
QSA Partners	<ul style="list-style-type: none"> • Apply a risk-based approach to child safeguarding aligned with this Policy and proportional to level of contact with children. • Maintain and implement safeguarding policies, controls, and procedures relevant to their context. • Conduct and update child safeguarding risk assessments for QSA-

	<p>funded projects.</p> <ul style="list-style-type: none"> • Comply with local mandatory reporting requirements and immediately notify QSA of any child safeguarding concerns linked to QSA-funded activities. • Ensure staff, volunteers, and contractors sign and adhere to relevant codes of conduct. • Maintain screening requirements (police checks or local equivalents) for people with direct or significant contact with children.
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8. Reporting

8.1 Mandatory Reporting

Mandatory Reporting Requirements: All QSA Staff, QSA Representatives, and QSA Partners must **immediately report (within 24 hours)** any *suspected, alleged, or known* incident of child harm, abuse, exploitation, or safeguarding breach connected to QSA activities, people, or funded projects. Failure to report may result in disciplinary action, termination of engagement, or contractual consequences.

This requirement applies equally to:

- incidents occurring in Australia or overseas
- concerns raised during QSA-related duties (on-site, off-site, travel, or after-hours)
- disclosures made by children, community members, partner staff, or QSA People

While reporting is **not mandatory for victim-survivors** it is encouraged. QSA respects the agency and wishes of children, families, and community members and will support partners to provide appropriate care, referrals, and options.

How to Report a Concern? Reports can be made to: **safeguarding@qsa.org.au** Where possible reports should use the **QSA Safeguarding Incident Reporting Form**, but concerns may also be submitted verbally or by email if the form is not immediately available.

Who Can Report? Reports may be made by:

- QSA Staff
- QSA Representatives
- QSA Partners
- community members
- children or families
- any individual with a concern
- Anonymous reports are permitted; however, this may limit QSA's ability to assess, investigate, or respond.

What Happens After a Report? **Child Safeguarding Focal Person or Board Chair will** receive and record the report.

- Immediate safety risks to a child/children are prioritised.

- A response plan is initiated, which may include partner engagement, referrals, or legal reporting.
- QSA handles all information in accordance with the **Privacy Act 1988** and relevant local privacy laws.

Mandatory Reporting to Authorities: Depending on the location of the incident, additional legal obligations may apply to report to:

- Australian State/Territory child protection authorities
- Police or law enforcement
- Locally mandated authorities in partner countries

QSA Staff and Partners are expected to comply with all **local, national, and international laws** governing child protection. QSA will provide guidance to partners on navigating local reporting requirements.

8.2 Reports Involving QSA People

QSA maintains a strict **zero-tolerance** stance on child abuse, exploitation, and policy breaches. If allegations relate to a QSA Staff member, volunteer, consultant, or representative:

- the Child Safeguarding Focal Person and Board Chair will initiate an internal process
- the individual may be stood down pending investigation
- external authorities will be notified where required by law

If You Are Unsure: If unsure whether an incident or behaviour meets the threshold for reporting it's important you **report anyway** (QSA follows a "better to report than not" approach), or seek confidential advice from the Child Safeguarding Focal Person.

8.3 Compliance, Legislation and Review

Policy Compliance: QSA is committed to maintaining strong safeguarding systems that meet our organisational responsibilities and sector standards. As such we will:

- Maintain policies, procedures, guidelines and documentation appropriate to our size, risk profile and the nature of our work.
- Ensure all safeguarding measures are implemented and regularly reviewed to maintain compliance with the **ACFID Code of Conduct**, DFAT's child safeguarding requirements, and relevant legislative frameworks.
- Monitor compliance across QSA Staff, QSA Representatives and QSA Partners through due diligence processes, project reviews, partner assessments, contractor obligations, and periodic internal audits.
- Take corrective, disciplinary, or contractual action where non-compliance with this Policy is identified. This may include suspension or termination of agreements or partnerships.

Relevant Legislation: Child safeguarding responsibilities are shaped by a range of legal obligations in Australia and in the countries where QSA partners operate. These include:

Australian Commonwealth Legislation

- Australian citizens and residents may be prosecuted in Australia for offences committed against a child overseas, under extraterritorial child protection laws.

- QSA People must comply with all applicable Commonwealth legislation relevant to child protection, safety and reporting.

State and Territory Legislation

- Each Australian state and territory has laws designed to protect children from abuse and exploitation.
- Mandatory reporting requirements may apply to individuals in certain roles and jurisdictions.
- Some jurisdictions (e.g., ACT Crimes Act 1900, Section 66AA) make it an offence *not* to report information that forms a reasonable belief a child sexual offence has occurred. Comparable reporting duties exist in multiple states and territories.

Local Laws in Countries Where QSA Works

- QSA Partners and Representatives must comply with all local child protection, criminal, labour and safeguarding legislation, including laws governing child labour, abuse, exploitation and reporting.
- QSA supports partners to understand and meet local legal requirements, and ensures alignment with QSA's minimum standards.

Standards and Instruments

- QSA's safeguarding approach is informed by international child rights frameworks and global safeguarding principles.
- As a member of **Quakers Australia**, QSA is committed to the **National Redress Scheme for Institutional Child Sexual Abuse – Grant Connected Policy** and will not provide DFAT funding to Australian organisations that are required to, but refuse to, join the Scheme.

Review and External Standards: QSA's safeguarding systems are reviewed **at least every three years**, or more frequently where risks, legislation, DFAT policy, or the operating environment changes.

Continuous improvement: is expected at all levels of QSA and our partners, with regular updates to policies, training, and practices to ensure best-practice safeguarding across all QSA-supported activities.

ANNEX 1: CHILD SAFEGUARDING PROCEDURES

- Reporting Concerns, Suspected or Alleged Cases
- Investigation and response
- Recruitment and Screening
- Risk Management
- Training and Awareness
- Working with Partners
- Use of images and personal information

1. Reporting Suspected or Alleged Cases to QSA

- **Mandatory and Immediate Internal Reporting for QSA People:** It is mandatory for all QSA Staff, Representatives and Project Partners to immediately report any concerns, incidents, or allegations whenever they have a reasonable belief that a child may have been harmed, is at potential risk of harm due to child exploitation, child abuse, or other non-compliance with this policy or the QSA Code of Conduct. Failure to report suspected incidents of child abuse is a breach of this policy. Partners are required to report to QSA within 24 hours of becoming aware of such incidents, and QSA is required to report to DFAT within 24 hours.
- **Internal Reporting:** All child protection queries and policy breaches are to be reported to QSA's Board Chair, who has been appointed as the Child Safeguarding Focal Person.
- **External Reporting (DFAT ANCP Requirements):**
 - For suspected or alleged cases of child exploitation, abuse, or policy non-compliance relating to DFAT business, notifications must be made using the DFAT Child Incident Notification Form and sent to childprotection@dfat.gov.au or by calling 02 6261 9048.
- **Reporting Major Transgressions to ACFID:** QSA will notify ACFID if they become aware of major transgressions against the ACFID Code in their own organisation or make a complaint to the ACFID Code of Conduct Committee (CCC) of major transgressions by other members.
- **Public Complaints Mechanism:** As an ACFID Code signatory, QSA is required to have a public complaints mechanism on its website to address complaints against the organisation.
- **Protection for Good Faith Reporting:** No penalties will be imposed on any adult or child reporting their suspicions or known facts if they speak from good faith and with reasonable grounds.
- **False or Malicious Reports:** Disciplinary action may be taken against any person who knowingly and wilfully reports false or malicious information regarding other QSA staff or representatives relating to child protection.

2. Investigation and Response

- The Child Safeguarding Focal Person will initiate swift investigations and reports into suspected breaches.
- Appropriate action will be taken based on the findings of investigations.

- QSA will ensure procedural fairness to all parties involved in the investigation process.
- Confidentiality of details and names of people involved will be maintained, unless disclosure is required as part of an investigation or mandatory reporting obligations.
- Where a breach of the ACFID Code is identified through the complaints process, QSA agrees to comply with the corrective or disciplinary action agreed to with the ACFID Code of Conduct Committee (CCC).

3. Recruitment and Screening

- QSA takes all reasonable precautions to ensure that QSA staff and representatives have passed screening procedures and do not pose an unacceptable risk to children.
- All staff, volunteers, and consultants in a position that involves contact with children, either under the position description or due to the nature of the work environment, will undergo an initial Federal Police records check and a Working with Children check on taking up the role. A satisfactory re-assessment prior to expiry will be a condition of continued employment and involvement.
- Where people are not resident in Australia, checks will be conducted through the relevant national police systems, or through checks with other bodies appropriate to national context where police systems are deemed insufficient.
- Robust recruitment procedures will be consistently applied, including behavioural questions at interview and verbal referee checks.

4. Risk Management

- QSA employs a whole-of-organisation level risk management approach and applies appropriate measures.
- QSA is responsible for preparing and maintaining project-specific risk management plans for all activities, which must include an assessment of risks to children, including child protection .
- These plans must detail controls and treatments for identified risks, specifying ownership and responsibility for ensuring risk treatments are implemented and monitored.
- In-country implementing partners should be fully engaged in the analysis, monitoring, and treatment of risks.
- Risk assessments are to be documented, reviewed/monitored, and updated over the life of the project/activity.
- QSA understands that gender inequality is a factor that that influences child protection risks and will work to ensure both that assessment of risks takes full account of gender inequality, and that measures to address gender inequality will not exacerbate child protection risks.

5. Training and Awareness

- All QSA representatives will receive information relating to QSA's Child Safeguarding policy and procedures during induction, briefings, and regular training.
- Where needed, further training will be provided for relevant individuals, such as responsible officers.
- QSA will equip its employees and representatives to be active bystanders through training and support to prevent or stop child abuse.
- Project leads and activity leaders are responsible for promoting awareness of this policy with people they manage and with project partners, and for actively providing information to beneficiaries and the community on expected employee and contractor behaviours and

promoting project-specific reporting mechanisms. They should also prioritise child safeguarding awareness-raising for themselves and their groups and provide budget lines for such activities.

6. Working with Partners

- QSA will work with its staff and project partners to ensure that the risk of sexual abuse, harassment, and exploitation of children within its projects is as low as possible.
- For high-risk areas, including child safeguarding, QSA must have appropriate mechanisms to assess, manage, and mitigate the risks when working with partners.
- Child safeguarding will be clearly addressed during discussions held with any potential visitors to QSA projects and to project partners, as part of considerations of the QSA Code of Conduct.
- QSA will work with partner organisations and research collaborators to build their capacity and ensure compliance with this Policy.
- Partnership agreements, sub-grant or sub-recipient agreements, and Memoranda of Understanding (MOU) will incorporate this Policy as an attachment. They will also include appropriate language requiring such entities and individuals, and their employees and volunteers, to commit to and abide by a Code of Conduct that is pursuant to the standards of this Policy.
- Agreements will expressly state that the failure of partners to take preventive measures against child abuse, to investigate and report allegations thereof, or to take corrective actions when child abuse has occurred, shall constitute grounds for QSA to terminate such agreements.
- QSA expects its implementing partners to operate in a manner consistent with the ACFID Code of Conduct and will use all reasonable efforts to support them in doing so.
- QSA's regular monitoring procedures with partners will include review of their Child Safeguarding standards and practice and offer further support and guidance in continual improvement.

7. Use of Images and Personal Information

- The QSA Code of Conduct and the QSA Code of Conduct for Visiting Projects and associated procedures will outline expected behaviours and guidelines associated with the ethical use of children's images and personal information.
- All photographs and videos used in QSA publications, online, and provided to DFAT must meet the DFAT Ethical Photography Guidelines and adhere to standards within DFAT's Child Protection Policy.
- Explicit signed consent for DFAT (ANGO donor) use must be obtained.
- QSA refers to and abides by DFAT's Child Protection Guidance Note on Use of Images and Social Media for additional guidance.

8. QSA Code of Conduct

- Adherence to the QSA Code of Conduct is mandatory for all QSA members, employees, volunteers, and consultants, and for all persons appointed to represent it or carry out work on its behalf.
- All staff, volunteers, and consultants in a position that involves contact with children, either under the position or due to the nature of the work environment, will be required to study and sign their agreement to adhere to QSA's Code of Conduct.

- The Code of Conduct and the Child-Safeguarding specific Code of Conduct for visiting projects is also mandatory for anyone visiting a QSA project in a private capacity or as a representative of QSA.
- The QSA Code of Conduct will clearly outline the expected and prohibited behaviours of all individuals in scope of this policy, particularly concerning interactions with children.

9. Consequences of Breaches

- Any breach of this Child Safeguarding Policy or the QSA Code of Conduct will be considered an act of gross misconduct.
- Breaches will lead to disciplinary action, which may include termination of employment for staff, or termination of association and/or contract with QSA for other QSA representatives.
- QSA may terminate a contract with a consultant, sub-contractor, partner, volunteer, or supporter immediately and without prejudice to any claim for damages, upon giving written notice if the person/organisation is in breach of this policy.
- In the event of non-compliance with the ACFID Code of Conduct, QSA will be required to submit a plan outlining how it will become compliant. If compliance is not achieved within the specified timeframe (up to twelve months, or sooner for higher risk areas), sanctions may be implemented, extending to the suspension and revocation of Code signatory status, which ACFID will publicise.