

1. Introduction

DT Global delivers International Development services globally, working with clients in the public and private sectors to achieve a positive and lasting impact on the lives of people around the world.

Our vision in undertaking our work is to create environments that are safe for children, where they are respected, protected and empowered and where staff are competent and well supported in meeting their protection responsibilities.

DT Global has a zero tolerance policy regarding any employees that engage in or support child exploitation and abuse including possession of child exploitation material. DT Global recognises that it is the shared responsibility of all adults to prevent child exploitation and abuse. The Child Protection Policy is part of DT Global's child protection framework and it enables DT Global to uphold the United Nations Convention on the Rights of the Child as well as the requirements of our global clients and donors. DT Global endorses the policies of our global clients and donors including the Department of Foreign Affairs and Trade (DFAT). The full text of the DFAT Child Protection Policy can be located here: www.dfat.gov.au/childprotection

The objective of this policy is to apply these principles across all work that we undertake and ensure that DT Global takes all possible steps to ensure the protection of children against all forms of child abuse.

2. Purpose and Scope

The DT Global Child Protection policy applies to **all** DT Global personnel (employees, volunteers, visitors, interns, trustees, board members, sub-contractors/consultants, associates and partners including downstream partners). This policy is intended to be read in conjunction with the DT Global's Code of Business Ethics and Conduct Policy. All employees, sub-contractors/consultants, associates and partners will be referred to collectively as "staff" for the purposes of readability. Personnel covered by this policy who engage in conduct prohibited by this Policy or against any associated laws will be disciplined which may include termination of employment or contract for service.

3. Principles

Principle 1: Zero tolerance of child exploitation and abuse

- DT Global has a zero tolerance approach to child exploitation and abuse. Child exploitation and abuse will attract criminal, civil and disciplinary sanctions.
- DT Global will not knowingly engage—directly or indirectly—anyone who poses a risk to children.
- DT Global works to minimise the risks of child exploitation and abuse associated with its functions and programs, and trains its staff and partners on their obligations under this policy.

Principle 2: Assess and manage child protection risk and impact

While it is not possible to entirely eliminate risks of child exploitation and abuse, careful

management can identify, mitigate, manage or reduce the risks to children that may be associated with DT Global functions and projects.

Principle 3: Sharing responsibility for child protection

To effectively manage risks to children, DT Global requires the commitment, support and cooperation of partner organisations and individuals who help to deliver programs managed by DT Global.

Principle 4: Procedural fairness

DT Global will apply procedural fairness when making decisions that affect a person's rights or interests. DT Global's partners are expected to adhere to this principle when responding to concerns or allegations of child exploitation and abuse.

Principle 5: Recognition of the best interests of the child

DT Global is committed to upholding the rights of the child and obligations under the United Nations Convention on the Rights of the Child. In all actions concerning children, the best interests of the child shall be a primary consideration.

4. Definitions

Abuse	Child abuse may be a deliberate act or it may be failing to act to prevent harm. Child abuse consists of anything which individuals, institutions or processes do or fail to do, intentionally or unintentionally, which harms a child or damages their well-being, dignity and prospect of safe and healthy development into adulthood". Physical abuse—The use of physical force against a child that results in harm to the child. Physically abusive behaviour includes shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning. Neglect—The failure by a parent or caregiver to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being. Emotional abuse—refers to a parent or caregiver's inappropriate verbal or symbolic acts toward a child or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child's self-esteem or social competence. Sexual abuse—The use of a child for sexual gratification by an adult or significantly older child or adolescent. Sexually abusive behaviours can include fondling genitals, masturbation, oral sex, vaginal or anal penetration by a penis, finger or any other object, fondling breasts, voyeurism, exhibitionism; and exposing the child to, or involving the child in, pornography. Ill-treatment—disciplining or correcting a child in an unreasonable and seriously inappropriate or improper manner; making excessive and/or degrading demands of a child; hostile use of force towards a child; and/or a pattern of hostile or unreasonable and seriously inappropriate degrading comments or behaviour towards a child. <i>Note: the above includes a child or children being present (hearing or seeing) while a parent or sibling is subjected to any of the above.</i>
Behavioural-based interview questions	Interview questions that probe the applicant's past behaviour in specific situations relevant to the position. Behavioural-based questions give interviewers additional information about the applicant's suitability to work with children.
Changes in circumstances	Personnel should report the following changes in circumstances to management: - involvement in criminal activity - disciplinary procedures and criminal or civil court proceedings relating to child exploitation and abuse.
Child or Children	In line with the United Nations Convention on the Rights of the Child, a child is defined as any person/s under the age of 18.
Child abuse material	Material that depicts (expressly or implicitly) a child under 18 years of age as a victim of torture, cruelty or physical abuse

Child exploitation	One or more of the following: - committing or coercing another person to commit an act or acts of abuse against a child - possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material - committing or coercing another person to commit an act or acts of grooming or online grooming - using a minor for profit, labour, sexual gratification, or some other personal or financial advantage.
Child exploitation material	Material, irrespective of its form, which is classified as child abuse material or child pornography material.
Child pornography	In accordance with the Optional Protocol to the Convention on the Rights of the Child, 'child pornography' means 'any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes.' For further information about child pornography offences, refer to the <i>Criminal Code Act 1995</i> .
Child pornography material	Material that depicts a person, or is a representation of a person, who is, or appears to be, under 18 years of age and is engaged in, or appears to be engaged in, a sexual pose or sexual activity, or is in the presence of a person who is engaged in, or appears to be engaged in, a sexual pose or activity, and does this in a way that a reasonable person would regard as being, in all the circumstances, offensive.
Child protection	An activity or initiative designed to protect children from any form of harm, particularly that arising from child exploitation and abuse.
Child protection policy	A statement of intent that demonstrates a commitment to safeguard children from harm and makes clear to all what is required in relation to the protection of children. It helps to create a safe and positive environment for children and to show that the organisation is taking its duty and responsibility of care seriously
Child safeguarding	The broad obligation on staff and partners to ensure that the design and delivery of all programs and organisational operations do not expose children to adverse impacts, including the risk of abuse and exploitation, and that any concerns about children's safety within the communities where they work are appropriately reported.
Contact with children	Working on an activity or in a position that involves or may involve contact with children, either under the position description or due to the nature of the work environment (also see Working with children definition)
Contractor	The individuals engaged to perform specific services under a contract and includes: (a) specified personnel nominated in a head agreement with an intermediary company (the contractor) to which payment is made; or (b) if the person performing the service is the service provider, he/she is an individual contractor
Criminal Record Check	A check of an individual's criminal history record. In Australia, national criminal record checks are available through state and territory police departments. They take around 20 working days. The type of employment should be specified as 'overseas employment'. Overseas, different checking procedures apply in each country and may take six weeks or longer. Individuals need to consent to a criminal record check and should be informed of the purpose for which it will be used including sighting by the client upon their request.
Grooming	Generally, refers to behaviour that makes it easier for an offender to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child, and then seek to sexualise that relationship (for example by encouraging romantic feelings, or exposing the child to sexual concepts through pornography)
Harm	Any detrimental effect on a child's physical, psychological or emotional wellbeing. Harm may be caused by financial, physical or emotional abuse, neglect, and/or sexual abuse or exploitation whether intended or unintended.
Impact	The overall long-term effect produced by an investment. This includes positive and negative changes produced by an investment (directly or indirectly, intended or unintended).

Informed consent	Ensures the child and the parent or guardian understand the implications, purpose and potential uses of photographs or videos.
On-line grooming	The act of sending an electronic message to a child, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender; or of sending an electronic message with indecent content to a recipient who the sender believes to be a child.
Personnel	Personnel are either employed by an organisation, engaged by an organisation on a subcontract basis, or engaged by an organisation on a voluntary or unpaid basis. Personnel can include paid employees, volunteers, visitors, interns, trustees, board members, sub-contractors/consultants, associates and partners including downstream partners.
Police clearance	The results of a criminal record check, which is issued by the police or other authority responsible for conducting such checks
Policy non-compliance	The failure to abide by DT Global's policy.
Statutory Declaration	A written statement which you sign and declare to be true before an authorised witness
Unacceptable risk	The portion of identified risk that cannot be tolerated, and that must be either eliminated or controlled. For people deemed an unacceptable risk, control mechanisms are not considered appropriate
Working with Children	Working with children means being engaged in an activity with a child where the contact would reasonably be expected as a normal part of the activity and the contact is not incidental to the activity. Working includes volunteering or other unpaid work.

5. Training and Awareness

DT Global recognises the right of a child to grow up safely and will aid the recognition and implementation of this right by training employees and partner organisations and contractually requiring all employees contractors and partner organisations to adhere to these principles.

Managers, Team Leaders and Project Managers are required to introduce this Policy to all personnel and to be responsible for adapting the systems and processes necessary for operating effectively in line with the Policy. Project Managers will ensure that the policy is included in the operations manual for their projects and that training is undertaken by project team members.

DT Global aims to increase awareness of risks relating to children and how to manage these risks. DT Global provides an on line training program to all personnel at the time of induction or activity start up and a refresher every two years or more often if required. The training program addresses child protection issues and personnel obligations under the policy, including mandatory reporting of allegations or suspected child abuse or exploitation. Local programs with appropriate country context may be implemented where it is deemed to be required.

6. Responsibilities for those covered by the scope of this policy

Everyone who works with and engages with DT Global has a responsibility to ensure that they always act within the terms of this policy and must:

- Never abuse and/or exploit a Child or act/behave in any way that places a child at risk of harm.
- Report any Child abuse and Child protection concerns they have in accordance with this policy.
- Respond to a Child who may have been abused or exploited in accordance with this policy.

- Cooperate fully and confidentially in any investigation of concerns or allegations of Child abuse.
- Contribute to building an environment where children are respected and encouraged to discuss their concerns and rights.
- Always treat children in a manner which is respectful of their rights, integrity and dignity, considers their best interests and does not expose them to, or place them at risk of, harm. For example: when taking images/pictures during visits, interacting with children or generating stories of children, ensure that this is done in a manner consistent with the appropriate DT Global policies and procedures.
- Never make any contact with a Child or family members associated with DT Global's work that is not supervised by a (or another) member of Staff. Such contact may include but is not limited to visits and any form of communication via social media, emails and letters.
- At all times, bear in mind the principles of this Policy and heighten awareness of how behaviour may be perceived both at work and outside work.

7. Recruitment and screening processes

DT Global is committed to preventing individuals from working with children if they pose an unacceptable risk to children. DT Global has robust human resources and recruitment procedures to assist with the targeted selection of suitable and qualified staff. DT Global will continue to enhance and improve these processes.

All potential personnel candidates who will be working with children will be informed at the time of interview that hiring will be contingent on a criminal history check. For all personnel who may come in contact with children through their position, recruiting personnel are to employ additional screening processes including:

- Advice to candidates at the point of application that they will be subject to criminal history checks.
- Prospective employees and sub-contractors are informed of DT Global's child protection policy early in the recruitment process.
- Targeted interview questions with emphasis on previous work with children.
- Verbal referee checks incorporating questions regarding previous work with children.
- Criminal history check via police checks and global criminal watch reports.
- Identity Verification

8. Risk Management

DT Global recognises that there are potential risks to children in the delivery of our programs. We understand that the effects of abuse on children are both devastating and long term. DT Global will undertake the following preventative measures to eliminate unacceptable risk to children:

- Undertake risk assessments of all programs and program activities ensuring all personnel and downstream partners are considered and implement strategies to minimise risk.
- Implement Child Safe recruitment and screening processes.
- All Personnel are required to comply with this policy and sign off on the Child Protection Code of Conduct.
- Training will be provided to all Personnel.
- Reporting of any child abuse and protection concerns is mandatory for all Personnel. Failure to do so may result in disciplinary action.
- Regular Project Reviews are undertaken ensuring that:
 - The Child Protection Risk Assessment is regularly reviewed for the program and program activities, particularly if there have been changes to the program;

- Personnel have undertaken relevant background checks, signed off on the Child Protection Code of Conduct and behaviours are in accordance with the code of conduct;
- Regular, scheduled monitoring (including reviews and spot checks) will be undertaken to ensure that downstream partners are meeting their obligations in relation to child protection.

9. Reporting Child Exploitation or Abuse

In support of DT Global's zero tolerance of child exploitation and abuse, all Personnel must report immediately any suspected or alleged case of child exploitation, abuse or policy non-compliance by anyone within scope of this policy in connection with official duties or business. All reports should be made in accordance with the 'Child Protection Reporting Procedure' available on the DT Global Information Hub or in the relevant 'Project Operations Manual'. All information provided will be treated with the strictest confidentiality and steps taken to ensure the rights of both the alleged victim and alleged offender are respected at all times.

Any person who has knowledge of or suspects a potential child protection issue involving DT Global must immediately report the matter via one of the following options:

There are several reporting mechanisms available to disclosers. Reporting is confidential, however, the person who receives a report may have a duty to disclose to certain persons and/or to law enforcement. A safeguards incident reporting decision tree process is captured at **Annex 2** and can assist in decision-making as to which reporting mechanism may be the most suitable.

DT Global reporting mechanisms include the following:

			
Safeguards Inbox	APAC Whistleblower Platform	DT Global Ethics Platform	In Person
This inbox is monitored by the Safeguards Incident Triage Committee.	Report anonymously via DT Global's Asia Pacific (APAC) Whistleblower Platform (managed by Deloitte) and your report will be triaged to the Safeguards Incident Triage Committee for action.	Report anonymously via DT Global's Ethics Platform (managed by Core Integrity) and your report will be triaged to the Safeguards Incident Triage Committee for action.	Report to your Program-level Safeguards Focal Point, Human Resources Manager or Line Manager.
E: safeguards@dt-global.com	W: www.dtglobaledeloitte.com.au E: dtglobal@deloitte.com.au	W: grs.ly/DTGlobalEthicsHotline E: speakup@coreintegrity.com.au	

DT Global Ethics Hotline (secure and anonymous):

URL: grs.ly/DTGlobalEthicsHotline QR Code:  Email: speakup@coreintegrity.com.au	Phone: 1800 765 692 (Australia) 900 998 400 (Spain) 1 (800) 203-7008 (USA) +61 2 9053 9285 (Rest of World) PO Box: PO Box 895, Darlinghurst, New South Wales, Australia, 1300
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Each project will place posters in their reception area with details for reporting any suspected case of child abuse or exploitation. The posters will include information for members of the community wishing to make a report as well as how to make anonymous reports.

The recipient of the report will follow DT Global reporting protocols (including reporting to the client who is funding the activity) and ensure the safety of the child. Furthermore, individual projects will adopt the DT Global reporting procedure and adapt to suit any specific requirements

of the Client or the project. If the activity is DFAT funded, the incident is to be reported by completing the DFAT Child Incident Notification form (available at: <http://dfat.gov.au/about-us/publications/Pages/child-protection-policy.aspx> and emailed to DFAT's Conduct and Ethics Unit via email in the first instance – childwelfare@dfat.gov.au.

In the event of an incident of suspected child abuse, DT Global management will immediately put into effect internal reporting steps; seek instructions, where required, from DT Global legal, and the Client, report to local authorities as required; and also give due regard to the appropriateness of informing local law and judicial mechanisms where this is not a requirement. If an expatriate is suspected, due regard must be given to the potential for extra-territorial proceedings by the expatriate's country of origin. If the accused is an Australian working internationally, the Australian Federal Police will also be contacted.

Any personnel who are under investigation may be suspended or transferred during the investigation. If a personnel member is found to have breached this policy or the behavioural code of conduct they will be dismissed immediately.

The '**DT Global Child Protection Reporting Procedure**' is available on the DT Global intranet or in the relevant 'Project Operations Manual'.

10. Policy Compliance and Review

DT Global will monitor compliance with the policy through new and existing methods, including performance assessments and reviews. This policy will be reviewed on a periodical basis and as a minimum every 3 years.

DT Global will request updated criminal record checks every 12 months for personnel who may be in contact with children as a result of their work with DT Global.

11. Supporting Documents of this Policy

Supporting DT Global Policies

- DT Global Code of Business Ethics and Conduct
- DT Global Electronic Communications Policy
- DT Global Safety Health & Environment Policy

These policies are available on DT Global's intranet site.

Relevant Supporting Legislation

Australian Human Rights Commission Act 1986 (Cth)

12. Version Control and Change History

Version Control	Effective Date	Approved by	Amendment
V1.0	29 May 2019	DT Global APAC Leadership Team	First Version
V2.0	28 Feb 2020	DT Global APAC Leadership Team	Second Version
V2.1	22 Sep 2020	DT Global APAC Leadership Team	Minor formatting amendments
V2.2	01 Apr 2023	DT Global APAC Leadership Team	Change to reporting options

Child Protection Code of Conduct/Professional Behaviours

I, _____, engaged by DT Global acknowledge that I have read and understand the DT Global Code of Conduct, and DT Global Child Protection Policy 2019, and agree that in the course of my association with DT Global.

I will:

- Conduct myself in a manner consistent with DT Global's values, Code of Conduct and as a representative of DT Global;
- Follow organisational policy and guidelines regarding the safety of children as outlined in this Child Protection Policy;
- Treat with the utmost respect the confidentiality of the children in DT Global's programs;
- treat children with respect regardless of race, colour, sex, language, disability, religion, ethnic or social origin or other status;
- not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
- not engage children under the age of 18 in any form of sexual intercourse¹ or sexual activity², including paying for sexual services;
- ensure wherever possible, that another adult is present when working near children;
- not invite unaccompanied children into private residences, unless they are at immediate risk of injury or in physical danger;
- not sleep close to unsupervised children unless absolutely necessary, in which case the supervisor's permission must be obtained, and ensuring that another adult is present if possible (noting that this does not apply to an individual's own children);
- never use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material through any medium
- not use physical punishment on children;
- not hire children for domestic or other labour: which is inappropriate given their age or developmental stage; which interferes with their time available for education and recreational activities; or which places them at significant risk of injury
- comply with all relevant Australian and local legislation, including labour laws in relation to child labour
- immediately report concerns or allegations of child exploitation and abuse and policy non-compliance in accordance with appropriate procedures
- immediately disclose all charges, convictions and other outcomes of an offence that relates to child exploitation and abuse, including those under traditional law, which occurred before or occurs during association with DT Global.
- be aware of behaviour and avoid actions or behaviours that could be perceived by others as child exploitation and abuse.

Filming and photographing children and Use of children's images

I further agree that, while working with DT Global or engaged in DT Global activities, and when photographing or filming a child or using children's images for work-related purposes, I must:

- take care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child
- obtain informed consent from the child and parent or guardian of the child before photographing or filming a child. An explanation of how the photograph or film will be used must be provided
- ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive
- ensure images are honest representations of the context and the facts
- ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.

I understand that the onus is on me, as a person associated with DT Global, to use common sense and avoid actions or behaviours that could be construed as child exploitation and abuse.

I also understand that any breach of the Policy or the Child Protection Code of Conduct/Professional Behaviours is a violation of my obligations and may lead to disciplinary action up to and including dismissal, termination of services, legal action, and/or criminal investigation and prosecution.

Signed: _____

Date: _____