

Watoto Child Care Ministries Australia Safeguarding Policy

1. Purpose

This safeguarding policy outlines how Watoto Child Care Ministries Australia (WCCM) will deliver on its commitment to the safety and wellbeing of children, young people and vulnerable people. This policy:

- Enables the provision of safe environments for children, young people and vulnerable people when taking part in WCCM programs and activities in Australia.
- Informs all Watoto board members, staff and volunteers of their obligations and responsibilities in protecting children, young people and vulnerable people involved in WCCM programs and activities.
- Supports a culture of safety and wellbeing for children, young people and vulnerable people.
- Sets out the processes for responding to and reporting complaints or concerns or incidents relating to the safety and wellbeing of children, young people and vulnerable people.
- Ensures compliance with relevant legislation, National Principles for Child Safe Organisations and ACNC external conduct standard 4.

2. Scope

- This policy applies to the operations, activities and programs of Watoto Child Care Ministries Australia (ABN: 99 106 623 723).
- This policy applies to all board members, staff, contractors and volunteers of WCCM.

3. Statement of Commitment

Watoto Child Care Ministries Australia is committed to promoting and protecting the safety and wellbeing of children, young people and vulnerable people. All children, young people and vulnerable people have the right to feel safe and be free from any harm or abuse. WCCM seeks to foster a culturally safe environment where children, young people and vulnerable people feel safe, welcome and empowered.

WCCM supports the United Nations Declaration of the Rights of the Child and our approach to child safety is based on the National Principles for Child Safe Organisations.

As part of WCCM's commitment to safeguarding children, young people and vulnerable people, WCCM:

- Has zero tolerance for harm and abuse.
- Will seek to provide an environment in which all children, young people and vulnerable people feel safe, supported and respected.
- Will support all children, young people and vulnerable people by recognising and taking into account their diverse needs.
- Will seek to empower children, young people and vulnerable people to speak up when they see or hear something that makes them feel unsafe.
- Is committed to child participation and recognises the unique insight, experiences and contribution of children and young people and will provide opportunities for their views to be incorporated into policies and programs.
- Takes seriously all concerns or allegations raised in relation to child abuse or any other inappropriate behaviour towards a child, young person or vulnerable person and will ensure it is responded to following our policies, procedures and relevant legislation including reporting to the police all instances in which a breach of the law has or may have occurred.
- Is committed to regularly training and educating our board, staff and volunteers on their child safe responsibilities, child abuse risks and potential signs of abuse.

4. Definitions

Abuse	Abuse against a child, young person or vulnerable person such as physical abuse, psychological abuse, emotional abuse, sexual abuse, or neglect.
Allegation	When someone accuses another person of having committed abuse or harm to a child, young person or vulnerable person.
Behaviour Support	Helping to reduce inappropriate or unacceptable behaviour by developing interventions that focus on strengthening and expanding appropriate behaviours.
Choir Chaperone	Adults travelling with the Watoto Choir to provide care and supervision to children and young people, in line with WCCM Child Safety Policy, Safeguarding Code of Conduct and training. Whilst travelling in Australia, Choir Chaperones are considered volunteers of WCCM Australia.
Choir Members	Children and young people travelling to Australia from overseas as part of the Watoto Choir.
Child/children or young person/people	Where this policy speaks about child/children, this refers to anyone under the age of 18 and includes young people.
Child-Related Role	Roles who as part of their involvement may interact with Children and young people.
Complaint	A complaint can include expressions of dissatisfaction related to WCCM's services, dealings with individuals, allegations about the conduct of staff or other individuals engaged by WCCM, another child or young person, or the handling of a prior concern.
Concern	When someone has a concern about the safety and wellbeing of a child, young person or vulnerable person, or about the misconduct of another person.
Cultural Safety	Cultural Safety is an environment where individuals can express their identity in the form they choose without any concerns. Having a culturally safe space acknowledges differences and similarities across cultural values, spiritual connections, family networks, community dynamics and enables shared respect for all individuals.
Disclosure	When a child, young person or vulnerable person discloses abuse or harm either directly (telling someone) or indirectly (through pictures, drawings, questions).
Harm	Any detrimental effect of a significant nature on the person's physical, psychological, or emotional well-being.
Mandatory reporting	Legal requirement that a designated person who has a reasonable belief that a child is subject to abuse or neglect, has an obligation to report that information to Child Protection.
Misconduct	Unacceptable behaviour with, towards, or in the presence of a child, young person or vulnerable person.
Safeguarding	Protecting the welfare and human rights of people that interact with WCCM, particularly those that might be at risk of harassment, abuse, neglect or exploitation. This refers to any responsibility or measure undertaken to protect a person from harm.
Vulnerable People	'Vulnerable people' are defined as individuals under the age of 18, or those who may be unable to take care of themselves, or unable to protect themselves against harm or exploitation. This could be due - but not limited to - their age, an illness, trauma, disability, or some other form of disadvantage. The vulnerability may be permanent (for example, an aged-related vulnerability) or temporary (for example, a person forced to move to a shelter due to personal circumstances).
Watoto Child Care Ministries (WCCM)/Watoto	Watoto Child Care Ministries (ABN: 99 106 623 723) and all its related entities operating within Australia.

5. Responsibility

The safety of children, young people and vulnerable people is the shared responsibility of everyone at WCCM. In addition, there are specific responsibilities which apply to key roles:

Watoto Child Care Ministries Australia Board

- Endorse policies and procedures relating to the safety and wellbeing of children, young people and vulnerable people.
- Promote WCCM's commitment to the safety of children, young people and vulnerable people as set out in this Policy.
- Ensure adequate resources are allocated to allow for the effective implementation of this policy and other related policies and procedures.
- Exercise due diligence to ensure that those responsible comply with their duties or obligations under relevant legislation.
- Support review of this policy and the and other related policies and procedures on a regular basis.
- Assist in creating and maintaining a child safe culture and a culture of inclusion.
- Conduct themselves in line with the WCCM Safeguarding Code of Conduct.

Watoto Child Care Ministries Australia Country Director

- Ensure all staff and volunteers engaged by WCCM understand their obligations under this Policy and other related policies and procedures.
- Oversee the implementation of this Policy by all WCCM staff and volunteers.
- Ensure adequate resources are allocated to allow for the effective implementation of this policy and other related policies and procedures.
- Assist in creating and maintaining a child safe culture and a culture of inclusion.
- Prioritise the safety of children and young people in strategic and operational decision making.
- Ensure staff and volunteers engaged by WCCM have adequate resources and processes to eliminate or minimise risks of abuse and harm.
- Ensure communication channels for investigating and reporting child abuse are established and remain clear.
- Receive Child Safety Concerns and Complaints, ensure reporting takes place as required, ensure the matter is responded to appropriately and records are maintained.
- Fulfil the function of 'Head of Relevant Entity' in matters of reportable conduct.
- Provide reports to the Board on reports of abuse and reasonable suspicion of abuse and outlining the status of matters being handled.
- Conduct themselves in line with the WCCM Safeguarding Code of Conduct.

Watoto Child Care Ministries Australia Staff and Tour Managers

- Prioritise the safety of children, young people and vulnerable people in strategic and operational decision making.
- Provide support to any person who raises a concern, complaint or makes a report in relation to the safety of a child, young person or vulnerable person.
- Promptly report all Child Safety Concerns and Complaints to the Country Director.
- Ensure all staff and volunteers in child-related roles who they oversee have been properly screened and selected using approved processes, before being permitted to work with children and young people.
- Ensure all staff and volunteers who they oversee undergo initial and ongoing training as required for their specific role and level of responsibility.
- Monitor all staff and volunteers who they oversee, and report on any suspicion of, or complaints, incidents, or potential breaches in policy.
- Identify risks and implement treatment strategies associated with the protection of children, young people and vulnerable people.
- Conduct themselves in line with the WCCM Safeguarding Code of Conduct.

All staff and volunteers (including choir chaperones)

- Maintain an understanding of the commitments and expectations in relation to the safety of children, young people and vulnerable people as set out in this policy and other related policies and procedures.
- Undertake any required induction and training relevant to the safety of children, young people and vulnerable people.
- Seek guidance from Managers or Country Director if there is a lack of understanding in relation to the commitments and expectations as set out in this policy and other related policies and procedures.
- Take the appropriate action to protect children, young people and vulnerable people from all harm, abuse and inappropriate behaviour.
- Assist in creating and maintaining a child safe culture and a culture of inclusion.
- Report any concerns about the safety of children, young people and vulnerable people in the organisation through the appropriate reporting channels as set out in this policy.
- Co-operate with any reasonable policy, procedure or instruction of the Country Director and managers relating to safeguarding.
- Conduct themselves in line with the WCCM Safeguarding Code of Conduct.

6. Legal and Regulatory Responsibilities

WCCM takes its legal and regulatory responsibilities seriously, including:

- **Mandatory reporting:** In most states and territories in Australia, those who are in religious ministry are considered mandatory reporters. WCCM will always respond to concerns for the safety and wellbeing of children and young people and where there is a reasonable belief that a child or young person is at risk of significant harm, report to relevant child protection authorities.
- **Failure to protect:** In most states and territories Failure to Protect legislation states that it is an offence to fail to protect a child from a sexual offence in an institutional setting. This means a person who has power or responsibility to do so, must reduce or remove the risk that a child will become the victim of a sexual offence by an adult associated with an institution.
- **Failure to report:** In most states and territories, Failure to Report legislation requires all adults to report information to police if they know, believe or reasonably ought to know that a child has been abused. This means all adults have the responsibility to report sexual offences against children to police - unless they have a reasonable excuse not to. Failing to report information to police without a reasonable excuse is an offence punishable by imprisonment. All WCCM staff and volunteers need to report to police if they have seen or heard something that has led them to form a 'reasonable belief' that an adult has sexually abused a child.
- **Duty of care:** A duty of care is a common law obligation to take reasonable steps to avoid foreseeable harm to another person or their property. In a child safety sense, WCCM will take all reasonable steps to prevent harm and minimise the risk of harm to those who are part of its services, programs and activities.
- **National Principles for Child Safe Organisations:** WCCM implements the National Principles for Child Safe Organisations and recognises that our work spans multiple Australian states and territories where state based Child Safe Standards legislation is in place, which is aligned with the National Principles.
- **Working with Children Checks:** WCCM will comply with all relevant legislation relating to requirements for working with Children, including Working With Children Checks. All staff and child-related volunteers will hold a valid working with children check for the state in which they are based and WCCM will conduct an assessment of specific state or territory requirements to hold WWC's for interstate events, programs or activities.
- **Reportable Conduct Schemes:** In NSW, VIC, TAS and WA Reportable Conduct Schemes apply to religious organisations and requires them to report and respond to allegations of child abuse (and other child-related misconduct) made against their workers and volunteers, and to notify the relevant state regulator. A reportable allegation can be made about any person over 18 years of age who is an employee (including a religious leader), a volunteer, a contractor or office holder of the organisation. Allegations can be made about the conduct of people even if they do not have direct contact with

children and the conduct occurred outside of their work with the Church. Conduct that is reportable includes, sexual offences (against, with or in the presence of, a child), sexual misconduct (against, with or in the presence of, a child), physical violence (against, with or in the presence of, a child), behaviour that causes significant emotional or psychological harm, significant neglect. Conduct may also be considered reportable if the behaviour breaches the WCCM Safeguarding Code of Conduct.

- **Child Employment Regulations:** In some states and territories regulations apply for employing children and young people in entertainment services, acting or modelling. Regulations cover permits, work hours, rest breaks, and code of practice to ensure a safe environment. WCCM will conduct an assessment prior to casting children or young people in acting, filming or photo shoots and ensure regulations are followed. WCCM has assessed the activities of the Watoto Choir tours and determined that due to children not receiving payment and the religious, not-for-profit and charitable nature of the tours there are no Child Employment Regulations that currently apply. WCCM will assess the planned schedule for each tour to ensure it is well within regulations regarding work hours and rest breaks as best practice.
- **ACNC External Conduct Standard 4:** requires charities to take reasonable steps to ensure the safety of vulnerable individuals overseas. It applies where individuals are:
 - being provided with services or accessing benefits under programs provided by the charity (whether directly or through collaboration with a third party)
 - engaged by the charity, or a third party in collaboration with the charity, to provide services or benefits on behalf of the charity or third party.

7. Safe Environments

WCCM seeks to create safe physical and online environments that minimise or eliminate the risk of harm to children, young people and vulnerable people. The safety of children, young people and vulnerable people is prioritised in our overall risk management approach. The following section of this policy and supporting documents describe how risks will be managed.

7.1 Risk Management

- A risk assessment should be undertaken in advance of the provision of any WCCM activities, programs or services involving children, young people or vulnerable people.
- The risk assessment must identify potential risks to the safety of children, young people or vulnerable people and the proposed control measures to be implemented to manage those risks.
- Ongoing or regular programs should be conducted in line with the approved risk assessment for that activity.

7.2 Protection of Vulnerable People Overseas

- WCCM and the Watoto Foundation ensures the safety of vulnerable people being provided with services or programs operated overseas by considering the risks to vulnerable people and ensuring operations are undertaken in a way that minimises the risk of harm, exploitation or abuse to children, young people and vulnerable people.
- Watoto/WCCM operations overseas follow safeguarding policies and procedures that:
 - address risks,
 - adequately screen and conduct background checks,
 - outline appropriate behaviour,
 - provide confidential and accessible complaints processes,
 - manages complaints and incidents appropriately, sensitively and promptly,
 - ensure staff and volunteers are provided with training in managing safeguarding and reporting suspected harm and abuse
 - protect the privacy of vulnerable people

7.3 Safe Environments for Watoto Choir Tours

Watoto Choir Tours are the primary activity undertaken by WCCM Australia that involve children and young people. The following section describes how WCCM will manage child safety risks and provide safe environments for children and young people in the Watoto Choir while they are travelling within Australia.

7.3.1 Accommodation and Billeting

- Accommodation for Watoto choir members during tours will be coordinated by the WCCM Australia office. The main provision of accommodation will be billeting with hosts provided by local churches. When the choir is not being hosted by a church, hotel or dorm room accommodation will be provided.
- To ensure safe environments for billeting arrangements WCCM will:
 - Require churches to provide billet hosts who have been appropriately screened and highly recommend that they hold valid relevant state based Working With Children Checks or equivalent.
 - Require that billet host homes do not have other adults residing in the home who have not been appropriately screened.
 - Require safe billet host homes to be provided where there is no presence of domestic family violence or AVO's.
 - Require that there is no use of alcohol or drugs and that inappropriate content through media, movies, internet is not accessible by choir members and chaperones, or used by members of the household for the duration of the billet stay.
 - Provide billet hosts with 'Billet Host Guidelines' with information about their stay, appropriate interactions, meal and transport arrangements, and who to contact with any concerns.
 - Always billet two choir members and one choir chaperone of the same gender, per household. Choir members will not be billeted without an adult choir chaperone accompanying them.
 - Require that choir members are provided with a separate room to adults for sleeping.
 - Require that choir members are provided with privacy for bathing and changing.
 - Provide choir members and chaperones with information and education about what behaviour is/isn't appropriate, what they can expect during a billet stay and who to talk to if they have concerns.

7.3.2 Behaviour Management

- Choir Members will be provided with behaviour support through training, discipleship, positive reward systems and clear Codes of Conduct.
- Choir members are expected to conduct themselves with safe, responsible and respectful behaviour.
- The Tour Manager is the main contact person to address behaviour concerns.
- The Tour Manager may take action in response to behaviour that may harm the individual or others, cause damage to property or is not consistent with the Code of Conduct for choir members.
- Responses may include:
 - Reinforcing and reminding the choir member of behaviour expectations and Code of Conduct.
 - Choir member taking a break from a performance.
 - Change in configuration of chaperone and choir member groupings.

- In severe cases of negative behaviour it may be necessary to arrange for a choir member to return home, in this case the Country Directory will coordinate travel and accompaniment for the choir member to return safely.

7.3.3 Change Rooms and Bathroom Arrangements

- Choir members will be provided with private changing areas for each gender for changing into performance attire and designated bathrooms for their use.
- Choir members will be provided with privacy for bathing and changing in accommodation arrangements.

7.3.4 Illness and Injury Management

- Minor illness or injury will be treated by the nominated Choir Tour First Aid officer, accompanied by a tour Chaperone.
- If a choir member experiences an illness or injury that requires treatment, the chaperone and Tour Manager will consult with the Country Director to arrange any visit to a General Practitioner or hospital and any follow up treatment, ensuring the choir member is accompanied by two chaperones or WCCM staff.
- An incident record form will be completed for any treatment given by First Aid or Medical professional and information passed onto the choir members guardian.

7.3.5 Performance Hours, Rest Breaks and Schooling

- WCCM has assessed the activities of the Watoto Choir tours and determined that due to children not receiving payment and the religious, not-for-profit and charitable nature of the tours there are no Child Employment Regulations that currently apply. WCCM will assess the planned schedule for each tour to ensure it is well within regulations regarding work hours and rest breaks as best practice.
- Each Monday is a rest day for choir members and chaperones, there will be no performances scheduled on this day.
- Performances are scheduled to begin no later than 7:30pm to ensure a finish time no later than 9:30pm.
- Appropriate rest breaks are provided between travel, rehearsal, schooling and performances.
- A number of days or a full week break will be scheduled at the start, end and mid tour (for tours 4 months or longer).
- Schooling is provided for choir members to follow the Ugandan Syllabus.

7.3.6 Photography, Video and Use of Images

- Images and videos must only be taken and used for promotional and educational purposes.
- Photos, videos and/or captions should not include children or young people's personal details such as full name, address, phone number, or the name of the school they attend as this may pose a risk to their safety.
- Photos and videos should not present children as victims, be undignified or depict them in a vulnerable or submissive manner.

7.3.7 Supervision of Choir Members

- Choir members will be supervised by chaperones travelling with them from Watoto. There will be one adult chaperone for every two choir members.
- During performances, rehearsals, school visits and outings choir members will be supervised at all times by the Watoto Choir team, including chaperones, Tour Managers and other approved staff and support crew.

7.3.8 Social Media, Communication and Online Safety

- WCCM staff, volunteers, church hosts and billet hosts, should not 'friend', 'follow' or connect with choir members or chaperones on any social media, gaming or instant messaging platforms, and should respect the privacy of choir members and chaperones by refraining from sharing about their stay on any social media platform.
- Choir members and chaperones should not be given access to internet or devices at host churches or in billet homes except where there may be need to contact the Tour Manager.

7.3.9 Transport

- Choir members should not be transported alone with any adult.
- Transport between venues on the choir tour will be by the tour bus.
- Transport between billet host homes and performance venues will be provided by billet hosts and choir members must only be transported with their chaperone.
- In the event of illness or injury, WCCM staff or volunteers may be called upon to provide transport ensuring that there are always two working with children approved staff or volunteers with a choir member.

8. People and Conduct

WCCM takes all reasonable steps to ensure people working with children, young people and vulnerable people are suitable and supported to reflect safety and wellbeing values in practice. Through ongoing support, education and training, staff and volunteers are equipped with knowledge, skills and awareness to keep children, young people and vulnerable people safe. The following section of this policy and supporting documents describe the standards of recruitment and screening, training and supervision and codes of conduct that are applied for Watoto board members, staff, and volunteers.

8.1 Recruitment and Screening

- WCCM's recruitment and screening practices prioritise the safety and wellbeing, children, young people and vulnerable people by selecting suitable and skilled people to work with them.
- Selection criteria and advertisements will clearly demonstrate our commitment to safeguarding and an awareness of our social and legal responsibilities.
- All Board members, staff, and volunteers pass through recruitment and screening processes prior to commencing their engagement with WCCM. Recruitment and screening practices include:
 - Clear position descriptions are provided that state relevant child safety requirements;
 - Communication of WCCM's commitment to safeguarding children, young people and vulnerable people is described to potential applicants for positions;
 - Holding face-to-face interviews (or via video conference platforms), which include safeguarding related questions;
 - Undertaking two professional reference checks for all potential employees and two suitable reference checks for volunteer positions;
 - Undertaking the relevant screening checks (specific to the role), which may include identity, criminal record, Working with Children Checks and qualification checks;
 - As soon as reasonably practicable following engagement, a requirement to review and acknowledge an understanding of this policy and safeguarding related procedures; and
 - Once engaged, a requirement to participate in an induction program, which will provide further information about our commitment to the safety and wellbeing of children, young people and vulnerable people.

- WCCM requires all staff and volunteers who are not exempt to successfully obtain, maintain and evidence for the duration of their employment or other engagement, a valid Working with Children Check relevant for the state in which they reside.

8.2 Choir Chaperones and Team

- Choir Chaperones and team travelling from Uganda as part of Watoto Choir Tours have, prior to travel, completed thorough screening and recruitment processes, child protection training, and training in their roles and responsibilities.
- WCCM Australia operates within the Australian National Principles for Child Safe Organisations and state based legislation relating to child safety, wellbeing and protection, and will therefore provide further training to Choir Chaperones and Team upon arrival to Australia.

8.3 Working with Children Checks for Watoto Choir Tours

- WCCM Australia will conduct an assessment of the tour schedule and determine which states or territories will require overseas or interstate visitors to hold a state based Working With Children Check due to the length of time in that state or territory or the nature of activities taking place.
- Where required WCCM will ensure that staff, volunteers, choir chaperones and team on tour hold all relevant Working With Children Checks.
- WCCM Australia Country Office will assist choir chaperones and team to apply for required Working With Children Checks, ensuring they travel with appropriate identification documents to complete the different state based processes.

8.4 Screening and Selecting Appropriate Billet Hosts

- See section 7.3.1

8.5 Screening of volunteers for the Visit Watoto Program

- WCCM Australia facilitates the screening of volunteers who will travel from Australia to Uganda to take part in Watoto activities.
- Volunteers seeking to take part in the visit Watoto program will pass through recruitment and screening processes prior to receiving approval to take part. Recruitment and screening practices include:
 - Communication of WCCM's commitment to safeguarding children, young people and vulnerable people is described to potential applicants,
 - A face-to-face interview (or via video conference platforms), which include safeguarding related questions;
 - Reference Check and endorsement reference from the Pastor or Minister at their local church,
 - Supplying identification and relevant screening checks including, criminal record/police check, and Working with Children Check,
 - Reading and acknowledging a commitment to WCCM's Safeguarding Code of Conduct,
 - Supplying records to show that standard child safety training has been completed within the past 3 years (this may be through their workplace, church or other volunteer organisation).
- Volunteers taking part in the visit Watoto program will receive further induction, training and supervision when they arrive at Watoto in Uganda.

8.6 Position Descriptions

- All staff and volunteers will be given clear position descriptions that clearly outline their role and their safeguarding responsibilities.
- Interactions between WCCM staff and volunteers and children, young people or vulnerable people should be limited to interactions directly associated with WCCM activities, programs or services. Staff and volunteers should not act outside the confines of their duties (as specified in their position description or the activity description).

8.7 Training and Supervision

- Training and education are important to ensure that everyone at WCCM understands that safeguarding children, young people and vulnerable people is everyone's responsibility.
- Staff and volunteers will be trained and educated on safeguarding practices, minimising risks of harm and abuse and how to recognise potential signs of abuse, and follow reporting procedures.
- WCCM's organisational culture aims for all board members, staff, volunteers, children and young people to feel confident and empowered to discuss any allegations of abuse or safety concerns.
- Staff and volunteers will be supported through ongoing supervision to develop their skills to protect children, young people and vulnerable people from abuse and promote the cultural safety of children from linguistically and/or diverse backgrounds, including the safety of children with a disability.

8.8 Code of Conduct

- All WCCM board members, staff and volunteers must agree to abide by the WCCM Safeguarding Code of Conduct which specifies the standards of conduct required when working with children, young people and vulnerable people.
- Board members, staff and volunteers are encouraged to report breaches to the WCC Safeguarding Code of Conduct to the WCCM Country Director.
- Significant and/or repeated breaches of this policy or the WCCM Safeguarding Code of Conduct will lead to disciplinary action. Disciplinary action may include a caution, further training, performance monitoring, a restriction or change in duties or dismissal. Any behaviour of a criminal nature will be reported to police.

8.9 Interaction and Touch

- Staff, volunteers and those working with children, young people and vulnerable people should remain in open environments that are in view of others, always with another approved person present. Children, young people or vulnerable people should not be taken into solitary or isolated areas.
- Those working with children, young people and vulnerable people should exercise safe and appropriate contact. Physical touch should remain within appropriate boundaries (limited to safe zones such as upper arms or shoulders).
- Those working with children, young people and vulnerable people must not do things of a personal nature that a child or young person can do for themselves, such as toileting or changing clothes. They must not engage in rough physical games, hold, massage, kiss, cuddle or touch a child, young person or vulnerable person in an inappropriate, sexual or culturally insensitive way.
- Interaction should remain within appropriate boundaries. Staff and volunteers should not develop any 'special' relationships with children, young people or vulnerable people that could be seen as favouritism such as the offering of gifts or special treatment. If pastoral support is required, this should only take place with approval of the Country Director or Tour Manager and take place in an open environment in view of another approved person.
- Children, young people and vulnerable people should be treated with respect and kindness. Verbal and non-verbal communication or physical actions must not be harsh, threatening,

intimidating, shaming, derogatory, demeaning, humiliating or sexual. For example, it is not appropriate to swear or use inappropriate language in the presence of a child or young person.

8.10 Giving Gifts

- WCCM staff and volunteers must not give gifts to individual children, young people or vulnerable people as this could be seen as favouritism or special treatment. Behaviours such as this could be regarded as grooming.
- Gifts for children and young people as part of Watoto Choir Tours should follow the guidelines in the Watoto Choir Manual.

8.11 Drugs, Alcohol, Smoking and Vaping

- WCCM staff and volunteers must not purchase for, give to or consume alcohol, drugs or smoke (including vaping) in the presence of or while they are caring for children, young people or vulnerable people.

9. Responding to Concerns

WCCM takes seriously all concerns or allegations raised in relation to harm, abuse or any other inappropriate behaviour towards a child, young person or vulnerable person and will ensure it is responded to following WCCM's policies, procedures and relevant legislation including reporting to the police all instances in which a breach of the law has or may have occurred.

If a person is at imminent risk of harm or in immediate danger report directly to the Police - CALL '000' (within Australia).

9.1 Safeguarding Concerns or Complaints

- A Safeguarding Concern may arise from:
 - A disclosure of harm that has occurred (recently or historically),
 - An observation of indicators of harm,
 - Observation or allegation of concerning behaviour,
 - A breach of the WCCM Safeguarding Code of Conduct or
 - An incident that has taken place as part of or relating to services, programs, activities of WCCM.
- Complaints may also be raised that can include expressions of dissatisfaction about WCCM related to:
 - dealings with individuals
 - allegations about the conduct of staff, volunteers, or other individuals engaged by WCCM, or
 - the handling of a prior concern.
- Anyone may raise a Safeguarding Concern or Complaint - Children, young people, board members, staff, volunteers, parents, carers, or a member of the community.
- All children, young people and vulnerable people will be informed of their rights to be safe and respected, and are encouraged to speak up to give feedback, make a complaint or let someone know when they don't feel safe.
- Children, young people and vulnerable people will be educated about and provided with access to information about the importance of personal safety, protective behaviours and strategies for finding support and help.
- WCCM will provide pathways to raise complaints and concerns that are accessible and child friendly and proactively seek feedback from children and young people about their feelings of safety when taking part in WCCM services, programs and activities.

- All concerns and complaints will be taken seriously and responded to promptly and with consistency and fairness. Processes to respond to concerns and complaints are child focussed, always prioritising their safety and wellbeing.
- Staff and volunteers will be trained and educated on safeguarding practices, minimising risks of harm and abuse, how to recognise potential signs of child abuse and follow reporting procedures.
- WCCM's organisational culture aims for all staff, volunteers, children, young people and families to feel confident and empowered to discuss any allegations of harm, abuse or safeguarding concerns.

9.2 Mandatory Reporting

- In most states and territories in Australia, those who are in religious ministry are considered mandatory reporters. WCCM will always respond to concerns for the safety and wellbeing of children and young people and where there is a reasonable belief that a child or young person is at risk of significant harm, report to relevant child protection authorities.
- This means that if a WCCM staff or volunteers form a belief on reasonable grounds, that a child is being harmed or exploited, or is likely to be in the future, they must report their concerns to the relevant state or territory child protection body.
 - It is an offence not to make a report.
 - Factors contributing to reasonable belief may include:
 - a child states they or someone they know has been abused (noting that sometimes the child may in fact be referring to themselves)
 - behaviour consistent with that of an abuse victim is observed
 - someone else has raised a suspicion of abuse but is unwilling to report it
 - observing concerning behaviour
 - If mandatory reporting is required, the Country Director or Choir Co-ordinator will provide support for those making a report.

9.3 Allegations of misconduct or abuse

- WCCM takes all allegations of misconduct and abuse seriously and has processes in place to investigate thoroughly and take action. WCCM board members, staff and volunteers are trained in how to deal with allegations and disclosures appropriately.
- Breaches to this policy or the WCCM Safeguarding Code of Conduct should be reported to the Country Director or Choir Co-ordinator and will be appropriately investigated and responded to following WCCM's Reporting procedures.
- Significant and/or repeated breaches of this policy or the WCCM Safeguarding Code of Conduct will lead to disciplinary action. Disciplinary action may include a caution, further training, performance monitoring, a restriction or change in duties or dismissal. Any behaviour of a criminal nature will be reported to police.

9.4 Reportable Conduct

- Allegations about the conduct of WCCM staff, volunteers or contractors will be assessed by the Country Director to determine if the nature of the conduct, the person subject of the allegation and the location meets the threshold and is subject to any state based Reportable Conduct Schemes.
- The Country Director fulfils the role of 'Head of Relevant Entity' to ensure reports to relevant regulators are made within required timeframes and investigations are carried out in a fair and timely manner following WCCM's Reporting procedures.

10. Associated documents

WCCM Safeguarding Code of Conduct

WCCM Responding to Safeguarding Concerns and Complaints Procedure

WCCM Billeting Guidelines

WCCM State Based Requirements Assessment Table

11. Document and version information

Policy Number

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Appendix 1

Responding to a Disclosure

- A disclosure is a process by which a child or young person conveys or attempts to convey that they are being or have been abused. Or, an adult may convey or attempt to convey that they were abused as a child. A disclosure might be verbal or non-verbal. Non-verbal disclosures may use painting or drawing, gesticulating, or you observe behavioural changes. Disclosures may be direct or indirect and a person may disclose to you about the abuse of another child person.
- When a person makes a disclosure it is important that the person receiving the disclosure follows these steps:
 - Listen
 - Remain as calm as possible, listen to the person and pay attention to what they're saying.
 - Show you're listening with your body language and by avoiding distractions.
 - Let the person tell you in their own words.
 - Gather enough information/details by asking open ended questions. Think about what, who, when, and where. For example, 'what happened', 'who was it', 'when did it happen', and 'where did it happen'?
 - Reassure the person of your support.
 - Think about your responses, such as, "it's good that you told me about this", "it's not your fault", "I believe you", and "I am going to help you". Inform them that they can always come back and tell you more if they would like to.
 - Explain that you will need to tell the right people so they can be helped.
 - Assess Safety
 - Check the current safety of the person. Are they safe to go home? Is urgent medical attention required? When will the child next see the alleged perpetrator?
 - Assess if the person is in immediate risk of serious harm, if so call 000.
 - Record Information
 - Record key information, writing down as best you can what the person has said in their own words.
 - Describe any physical injuries (size, colour, location on body).
 - Include any other indicators of harm you may have observed or circumstances you're aware of.
 - Report
 - Report to the WCCM Australia Country Director

- If a report to child protection services or the police is required, the WCCM Australia Country Director will support you to make this report as it is best that the person with the most knowledge of the situation makes the report.
- The WCCM Australia Country Director will arrange follow up support to you or counselling services if required.
- Respect the privacy of the person who disclosed it to you and don't share the information with others, including other team members.
- Don't attempt to contact the alleged perpetrator or attempt to investigate the matter yourself. Report and follow any instructions given.

Appendix 2

Forms of Abuse - Definitions

Neglect

- When a child or young person's basic needs for growth and development are not met. This may include failure by parent or caregiver to provide adequate food, water, clothing, housing, healthcare, personal hygiene or supervision.

Sexual Abuse

- When a child or young person is involved in sexual activity, whether that be by a person using their power over them or taking advantage of their trust, or sexual activity perpetrated by another child or young person. Sexual abuse is a crime and can involve a wide range of sexual activity, including physical, verbal or emotional. For example, encouraging a child or young person to do, watch, or hear something sexually explicit, sexual intercourse, inappropriate touching, exposure to pornographic material, conversations of a sexual nature.

Physical Abuse

- When a child or young person is subject to or is at risk of ill-treatment, non-accidental injury or physical trauma. This may include excessive discipline, hitting, beating, shaking, burns, bites or inappropriate administration of alcohol and drugs. Physical abuse does not always leave visible marks or injuries, it is the act itself that causes injury or trauma to the child.

Emotional or Psychological Abuse

- When a child or young person experiences emotional disturbance or psychological harm resulting in impaired social, emotional, cognitive or intellectual development due to the behaviour or attitude of a parent or caregiver. Emotional or psychological abuse damages a child or young person's confidence and self-esteem and may include a range of behaviours such as excessive criticism, bullying, withholding affection, exposure to domestic family violence, intimidation or threatening behaviour.

Other Concerns

- Other concerns may cause harm or put a child at risk of harm, such as the mental health of parents or carers, a concern for the welfare of an unborn child, or a child or young person who is a danger to themselves or others.