

GOV-004
Enabling Services

Safeguarding People Policy

Global
Policy Owner: Legal Governance Risk and Compliance Director

1. PURPOSE

- 1.1. The Fred Hollows Foundation (FHF) is committed to ensuring that everyone we interact with as we deliver our mandate is protected from all forms of Harm and Abuse arising from our programs and operations.
- 1.2. FHF recognises that Harm and Abuse including Sexual Exploitation, Abuse and Harassment perpetrated towards children and adults is rooted in an inherent power imbalance between the individual and the organisation (and its representatives). We recognise that gender inequality, culture or ethnicity, being a person with a disability can also exacerbate power dynamics which can lead to Harm, Abuse and Exploitation by those in a position of power and/or authority. We seek to address this by embedding an intersectional and inclusive approach in our safeguarding work.
- 1.3. We recognise the critical role that the FHF organisational culture plays in preventing Harm and Abuse from occurring, as well as building and maintaining an open, transparent and equitable culture where representatives feel safe to speak out about unacceptable behaviour. We seek to ensure that a safe work environment is experienced by all FHF representatives.
- 1.4. All FHF representatives have a duty of care and responsibility to keep all individuals safe who we come into direct or indirect contact with. We operate a zero-tolerance approach to safeguarding misconduct and inaction, suspected breaches of this policy are taken seriously, and we will take appropriate disciplinary action where needed.
- 1.5. FHF takes a risk-based approach to safeguarding, Survivor-Centred practice/ Trauma Informed response in case management and outlines mandatory reporting obligations.
- 1.6. This Policy is guided by the ACFID Code of Conduct, DFAT's Child Protection Policy 2025, DFAT Protection from Sexual Exploitation, Abuse and Harassment Policy (September 2025), the ACNC's External Conduct Standards, Inter-Agency Standing Committee Minimum Operating Standards for the Prevention of Sexual Exploitation and Abuse (IASC MOS-PSEA) 2024, Core Humanitarian Standard on Quality and Accountability (CHS).

2. SCOPE & DEFINITIONS

- 2.1. This Safeguarding People Policy applies to everyone associated with FHF (FHF Representatives), including but not limited to:
 - 2.1.1. All permanent and temporary employees
 - 2.1.2. Volunteers and interns
 - 2.1.3. Consultants
 - 2.1.4. Invited visitors (including donors/funders; media/journalists)
 - 2.1.5. Board Members, Advisors
 - 2.1.6. Partners (Government, Strategic) and Implementing organisations (i.e. local NGOs, Ministry of Health)
 - 2.1.7. Third-party contractors (i.e. suppliers, builders, contractors etc.)
 - 2.1.8. Members of research bodies, academic institutions and associates.
 - 2.1.9. Patrons, Ambassadors and Champions

References

- 2.2. This policy addresses the following areas of safeguarding:
 - 2.2.1. Child Safeguarding,
 - 2.2.2. Adult Safeguarding, and
 - 2.2.3. protection from Sexual Exploitation, Abuse and Harassment.
- 2.3. FHF commits to addressing safeguarding throughout its work, through the pillars of Prevention, Reporting and Response and promoting good governance and accountability.
- 2.4. FHF safeguards everyone who encounters its work, including protecting staff from Harm and inappropriate behaviour such as Bullying and Harassment.
- 2.5. In this Policy, capitalised and frequently used terms have the meaning set out at paragraph 7.

3. GUIDING PRINCIPLES

The guiding principles that underpin all FHF's Safeguarding People functions, actions and decisions are as follows:

- 3.1. **Zero tolerance:** FHF maintains a zero-tolerance approach all forms of child Abuse and inaction to Sexual Exploitation, Abuse, Harassment.
- 3.2. **Survivor-Centred and Trauma-Informed Approaches:** FHF prioritises the safety, dignity and wellbeing of victim-survivors and children in all case management actions.
- 3.3. **Inclusion and equity:** FHF ensures safeguarding approaches are inclusive, equitable and responsive to risks and barriers experienced by diverse groups of people.
- 3.4. **Prevention through risk management:** FHF embeds proactive measures to minimise safeguarding risks across all programs, operations and partnerships.
- 3.5. **Empowering and participatory approaches:** FHF empowers communities and children to understand their rights, raise concerns in a safe, accessible way and contribute to safeguarding decisions.
- 3.6. **Safe, Accessible Mandatory Reporting:** FHF requires immediate reporting of all Safeguarding Concerns through the mechanisms outlined in the Speak-Up Policy.
- 3.7. **Leadership, culture and accountability:** FHF integrates safeguarding into leadership, governance and culture with transparency, clear accountability and a continuous improvement.
- 3.8. **Partnership:** FHF prioritises national and local solutions by working with local communities, who have a critical part to play in preventing, detecting and reporting Safeguarding Concerns.
- 3.9. **Non-Discrimination:** FHF abides by the principle of non-discrimination in all our safeguarding work.
- 3.10. **Safeguarding children and At-Risk Adults:** FHF recognises children and At-Risk Adults face heightened risks and therefore applies additional safeguards in all relevant programs and operations.
- 3.11. **Do No Harm:** FHF adheres to the Do No Harm principle across all our work which means we design, deliver and communicate our work in ways not to create or worsen harm, including Sexual Exploitation, Abuse and Harassment (SEAH), to children, At-Risk Adults or their communities, by anticipating, preventing, mitigating and addressing negative impacts throughout the project cycle.
- 3.12. **Highest applicable standard approach to safeguarding.** Where there is discrepancy between national laws and practices, international laws, conventions and standards, particularly laws concerning children and At-Risk Adults, the most protective measures will apply.

4. COMMITMENTS UNDER THIS POLICY

FHF is committed to the below Minimum Standards. These Minimum Standards are interlinked and mutually reinforcing safeguarding commitments. No Minimum Standard can be considered in isolation, and each minimum standard must be given equal weight and importance across the organisation.

References

Further details and accountabilities regarding these Commitments are available in the Global Safeguarding Commitments Framework on FredNet.

4.1. Minimum Standard 1: Governance, Accountability and Risk Management

The Global Board holds ultimate accountability for safeguarding at FHF. Safeguarding will be a standing Board agenda item with a designated safeguarding Board member. The Board will provide organisational safeguarding oversight and risk monitoring and ensures prevention, mitigation and response measures remain robust, current and fit for purpose to address Child Exploitation, Abuse and Harm, and to Prevent Sexual Exploitation, Abuse and Harassment of At-Risk Adults and all FHF Representatives.

4.2. Minimum Standard 2: Leadership and promotion of safeguarding and inclusion culture

FHF leadership and management will prioritise safeguarding and build an organisation where employees can safely challenge power and bias and promote equity, diversity and inclusion. They will provide formal and informal safe spaces for employees to discuss diversity, equity and inclusion and Safeguarding. Management teams will hold clear safeguarding accountabilities, reflect and act to model a transparent, safe and inclusive culture, and create opportunities for ideas and feedback on what does and does not work. FHF will remove barriers to participation, protection, reporting and support, including language, safety, discrimination and accessibility.

4.3. Minimum Standard 3: Knowledge Strengthening on Safeguarding

FHF will promote this policy in accessible, clear ways through inductions, training and organisational communications so all representatives understand their safeguarding responsibilities. All FHF Representatives will complete mandatory, role appropriate training with enhanced modules for elevated duties, covering this policy, prevention, recognising Abuse including Grooming and online exploitation, reporting concerns, and responding to disclosures on Child Safeguarding and SEAH. FHF will resource awareness raising, training, participant engagement, procedures and case management through annual organisational and country budgets, with project specific lines based on risk that cover prevention and incident management

4.4. Minimum Standard 4: Human Resources and employment cycle

FHF will embed safeguarding in all People & Organisation Development activities and recruit values-aligned people through safer recruitment practices, including risk-based role assessments, appropriate checks (police checks, child safety checks) and reference checking, safeguarding included in adverts and interviews, and prestart signoff of the Safeguarding People Policy and Code with records retained. FHF will ensure all representatives understand their safeguarding responsibilities and have the skills to meet them and exit interviews will assess policy implementation.

4.5. Minimum Standard 5: Safe Programming, Research, Learning, Monitoring and Evaluation

FHF will make safeguarding an integral part of all program design, delivery, research, monitoring, and evaluation. For each proposal, a safeguarding risk assessment will be required, including dedicated budgets for risk mitigation, training, enhanced assessments, and case management. Consortium due diligence will also be conducted. Each country office will appoint a Safeguarding Focal Point to help design, communicate, and implement reporting and response mechanisms that are safe, accessible, child-friendly, and culturally appropriate. There will be regular awareness-raising activities, open discussions during implementation, and annual reporting on progress and lessons learned. FHF will use a risk-based, intersectional approach to remove barriers for at-risk groups. All research activities will require ethical clearance, risk assessment, and compliance with duty of care standards in accordance with the Research & Evaluation Policy.

4.6. Minimum Standard 6: Partners, Contractors and Suppliers

References

FHF will conduct proportionate due diligence of all partners, contractors and suppliers to assess safeguarding policies, procedures and capacity, and will support gap closure or require adoption of FHF policy where appropriate. All agreements will include safeguarding clauses and clear arrangements for case management, incident reporting and information sharing, including donor requirements, and partners will be briefed at project inception. FHF will regularly monitor partner compliance and performance and will agree timebound action plans where commitments are not met. Safeguarding requirements will be risk based and proportionate to the scope of work and to the level of direct or indirect contact with children and At-Risk Adults.

4.7. Minimum Standard 7: Engagement with Children, At-Risk Adults and Communities

FHF will ensure safe, inclusive and participatory engagement with children, At-Risk Adults and communities, recognising unequal power dynamics. We will raise awareness of the Safeguarding People Policy, procedures and reporting in context specific, age, gender and culturally sensitive ways, using child friendly approaches, respectful communication and local languages. We will use participatory risk assessments and mitigation plans for physical and online activities, create opportunities for participants to share views and feedback. We will require thorough risk assessments for all programs, research, advocacy, fundraising/business development and safeguarding case management.

4.8. Minimum Standard 8: Reporting and Responding

FHF will maintain safe, accessible and context appropriate reporting and response processes in all offices, with mandatory internal reporting within 24 hours via global speak up channels or local mechanisms that feed into the Global platform. All concerns will be recorded on a global tracking register. Responses will be survivor centred and trauma-informed, uphold confidentiality, sensitivity and equal rights to protection as well as strong nonretaliation protections for anyone who reports. Responses will be guided by country context safeguarding mapping, and the Safeguarding Operating Procedures. FHF will report to authorities following a Do No Harm risk assessment that considers legal context and survivor wishes, meets regulator and donor reporting requirements and will keep comprehensive case records for assurance.

4.9. Minimum Standard 9: Media, Communication and Advocacy

Before any content collection or advocacy, FHF will conduct a risk assessment and apply mitigation measures. Materials that expose identity or depict anyone in a vulnerable, degrading or misleading way are strictly prohibited. Media representatives must follow interview guidance, sign the Safeguarding People Policy, attend a safeguarding briefing, and be accompanied during activities. Fundraising and business development must use ethical information practices, ensure responsible representation, and obtain informed consent from all participants.

4.10. Minimum Standard 10: Data Privacy, AI and Digital Safeguarding

FHF will promote safe online engagement by identifying and reducing digital safeguarding risks, preventing Exploitation and Abuse of children and At-Risk Adults, and ensuring prompt reporting of concerns. We will follow the Do No Harm principle, align with our Technology Use Policy on data protection, and comply with all applicable laws and donor requirements. Our digital platforms will be kept secure, and we will monitor AI to address risks to children and vulnerable groups, taking corrective action as needed.

5. RESPONSIBILITIES & ACCOUNTABILITIES

5.1. The Global Board

- 5.1.1. The FHF Global Board holds ultimate accountability for safeguarding across the organisation.
- 5.1.2. It oversees the global Safeguarding People Policy framework ensuring robust governance, risk management and compliance systems are in place.

References

- 5.1.3. The Global Board ensures effective safeguarding oversight by monitoring organisational performance, learning, resourcing and timely escalation and reporting of serious incidents.

5.2. Senior Leadership

- 5.2.1. Senior Leaders set the tone and culture for a safe and inclusive organisation by modelling behaviours and values that underpin safeguarding in everyday practice.
- 5.2.2. The Senior Leaders are responsible for embedding safeguarding and intersectional approaches into strategy, operations, creating a safe environment for staff to voice concerns and ensuring other leaders are held accountable for preventing all forms of harm to children, At-Risk Adults and FHF Representatives by addressing Safeguarding gaps within the organisation.

5.3. Global Safeguarding Manager

The Global Safeguarding Manager leads the development, implementation and continuous strengthening of the FHF safeguarding framework including:

- 5.3.1. Ensuring FHF Safeguarding People Policy aligns with international standards and sector good practice
- 5.3.2. Overseeing safeguarding prevention components (training and capacity development)
- 5.3.3. Providing guidance and support FHF safeguarding case management processes
- 5.3.4. Monitoring compliance and track safeguarding performance data
- 5.3.5. Driving FHF safeguarding learning and continuous improvement
- 5.3.6. Supporting policy contextualisation, development of safeguarding procedures and implementation guidelines.
- 5.3.7. Preparing safeguarding reports for Senior Leadership and the Board

5.4. Managers

FHF Managers are responsible for:

- 5.4.1. The implementation of Safeguarding practices in their teams through training, supervision and safe recruitment.
- 5.4.2. Ensuring safeguarding commitments are reflected in daily practice, program development/delivery, risk assessments and mitigations.
- 5.4.3. Modelling respectful, inclusive behaviour in the team
- 5.4.4. Creating an environment where concerns can be raised safely, escalate safeguarding risks with like with FHF procedures.

5.5. All FHF Representatives

FHF Representatives will:

- 5.5.1. Adhere to the principles and Minimum Standards under this Policy and any related procedures.
- 5.5.2. Take all reasonable care to ensure that their actions or omissions are not in breach of this Policy, nor directly or indirectly encourage others to breach this Policy.
- 5.5.3. Report any Safeguarding Concerns by following the Safeguarding Concern Reporting Process within this Policy.

6. MONITORING

- 6.1. A report on the implementation of this Policy across FHF will be submitted to the Board no less than every three years. The Global Safeguarding Manager is responsible for compiling this report and sharing with the CEO prior to Board submission.

References

- 6.2. This Policy will be reviewed every three years or when major changes occur and the Global Safeguarding Manager is responsible to prepare this review.
- 6.3. The Global Compliance Team has oversight for all Governance and Operational policies and will ensure the Policy is listed on the Policy Register and provide support to the Global Safeguarding Manager to ensure monitoring and reporting obligations are met.

7. DEFINITIONS

At-Risk Adult: an individual 18 years of age or above who is unable to protect themselves from Harm, abuse and exploitation for any reason; is at increased risk due to having one or more Protected Characteristic(s); as a result of conflict or disaster; or experiences a power differential that puts them at risk.

Abuse: abuse is any act or failure to act in a relationship of responsibility, trust or power that causes actual or potential harm to a person, including children. In most cases, the abuser is someone the victim knows well, such as a parent, other caregiver, relative or friend. Abuse can be intentional or unintentional and includes Discriminatory Abuse; Emotional / Psychological Abuse; Exploitation (including Transactional Sex); Financial or Material Abuse; Spiritual abuse, Harmful Traditional Practices; Neglect; Organisational Abuse; Physical Abuse; and Sexual Abuse. Abuse includes physical abuse, emotional abuse, sexual abuse, ill-treatment, neglect, and online or digital abuse, forced labour and trafficking. It also includes a child or children witnessing such abuse against another child or adult

ACFID means the Australian Council for International Development.

ACNC means the Australian Charities and Not-for-profits Commission.

Adult Safeguarding: refers to the policies, practices and actions taken to prevent, identify and respond to harm, abuse, exploitation, neglect or harassment experienced by adults in connection with FHF's operations, programs, research and data activities, and partnerships

Bullying: is repeated behaviour towards a person or group of people which humiliates, offends, intimidates or threatens the person or group of people and that a reasonable person would have anticipated would humiliate, offend, intimidate or threaten someone

Child: means anyone below the age of 18 years, regardless of local law, following the definition provided by the United Nations Convention on the Rights of the Child 1989

Child Safeguarding: Child safeguarding is the set of policies, procedures, systems and day-to-day practices that FHF uses to prevent, detect and respond to any harm, abuse, exploitation or neglect involving children that could arise from our representatives, programs or communications offline and online

Emotional/Psychological Abuse: the emotional ill-treatment of a person that adversely affects their wellbeing or development. Some level of emotional abuse is involved in all types of ill treatment, though it may occur alone. It includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or support networks. Other harmful experiences such as frequently being forced to witness violence in the domestic environment are also classified as emotional abuse.

Exploitation: this encompasses, but is not limited to, the following forms of exploitation:

- *Commercial exploitation* of an individual occurs when that person works or does activities for the benefit of others. This includes, but is not limited to, domestic work, forced participation in armed conflict, including the use of child soldiers, and involvement in harmful and hazardous work.
- *Sexual exploitation* is a form of exploitation and sexual abuse that involves an individual being engaged in any sexual activity in exchange for money, gifts, food, accommodation or any other material needs (e.g. prostitution, trafficking and the exploitation of and creation and

dissemination of sexually explicit videos and pictures). This can also occur in an online where an act of a sexually exploitative nature is carried out against an individual.

Financial/Material Abuse: Includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, corruption or the misuse or misappropriation of property, possessions or benefits.

Forced Labour: a person, the victim, who provides labour or services if, because of the use of coercion, threat or deception, a reasonable person in the position of the victim would not consider himself or herself to be free to cease providing labour or services or to leave the place or area where he or she, the victim, provides labour or services.

Grooming: gradual behaviours that manipulate and control a child, as well as their family, kin and carers, other support networks, or organisations, in order to perpetrate child sexual abuse. Grooming can include a range of in person, or online behaviours and communications intended to facilitate sexual contact with a child or young person and stop victims from disclosing abuse.

Harassment: Unwanted conduct, including threats and demands, which offends, intimidates or humiliates someone. It can be a one-off or repeated act.

Harm: Any detrimental effect on an individual's physical, psychosocial, or emotional wellbeing. Harm may be caused by Abuse, Exploitation, Harassment, Bullying, or any action that puts the person at risk, whether intentionally or unintentionally.

Harmful Traditional Practices: mean forms of violence which have been committed, primarily against women and girls, in some communities and societies for so long that they are considered, or presented by abusers, as part of accepted practice. Such traditions include female genital mutilation and forced marriage. They may also include different forms of ritual ceremonies involving individuals in harmful religious or spiritual activities. Children and adults with disabilities may be at higher risk of becoming victims of witchcraft beliefs in certain contexts for example individuals with albinism. Harmful Traditional Practices are a type of Abuse.

Human Trafficking: Any involvement in the recruitment, transportation or receipt of an individual for the purpose of Exploitation, by means of threat, force or other forms of coercion.

Modern Slavery means conduct constituting slavery, servitude, Forced Labour, deceptive recruiting, debt bondage and Human Trafficking. Modern Slavery is Exploitation.

Neglect: Persistent failure to meet an individual's basic physical and/or psychological needs or provide adequate care and support for them. This includes the failure to protect children, youth and at-risk adults from Harm as well as provide adequate nutrition, shelter and safe living conditions.

Online Abuse: Any form of abuse that happens whilst interacting with digital technology. It can happen anywhere, for example social media, text messages and messaging apps, email, online chats, online gaming, and live-streaming sites. Examples of online abuse include cyberbullying, Grooming, sexting, Sexual Abuse, Psychological/Emotional Abuse and Sexual Exploitation.

Protected Characteristics: The United Nations refers to international human rights legal frameworks that combat specific forms of discrimination, including discrimination against indigenous peoples, migrants, minorities, people with disabilities, discrimination against women, racial and religious discrimination, or discrimination based on sexual orientation and gender identity.

Physical Abuse: Actual or potential physical harm perpetrated by another person, adult or child. This may involve hitting, shaking, poisoning, burning or other physical acts.

Safeguarding: A set of organisational policies, procedures and practices employed to ensure FHF is a safe organisation, responsible for protecting individuals from the risk of harm, abuse, exploitation, neglect and harassment caused by those who have a duty to protect and care for them.

Sexual Abuse: Forcing or enticing an individual to take part in sexual activities. The sexual abuse of children occurs whether or not the child is aware of what is happening. This may include rape, oral sex, penetration, masturbation, kissing, rubbing and inappropriate touching. It also includes engaging

References

an individual in the viewing or production of sexual images, witnessing sexual activities and the encouragement to behave in sexually inappropriate ways.

Spiritual Abuse: Spiritual abuse is the use of religion, belief or spiritual authority to coerce, control or exploit a person, causing harm or suffering and restricting their rights or liberties, through intimidation, threats, forced isolation, or manipulation of religious precepts, within relationships marked by power imbalances or expected trust

Survivor-centred approach: A survivor-centred approach recognises that the survivor, the person to whom the harm has been done, has the right to be treated with dignity and respect and not be exposed to victim-blaming attitudes; express their wishes for what action they would like to happen to deal with the harm and abuse instead of feeling powerless; privacy and confidentiality; non-discrimination based on gender, age, race/ethnicity, ability, sexual orientation, HIV status or any other characteristic; and receive comprehensive information and support to help them decide what action to take instead of being told what to do.

Trauma- informed approach means recognising the effects and signs of trauma in safeguarding incident management, making the process safe, clear and respectful, integrating this knowledge into decisions and referrals, and actively avoiding re-traumatisation.

Protection from Sexual Exploitation and Abuse (PSEAH): The term used by the humanitarian and development community to refer to the prevention of sexual exploitation, abuse and harassment of affected populations by staff or associated personnel.

Survivor: The child or adult who has been Harmed, Abused or Exploited. The term ‘survivor’ is often used in preference to ‘victim’ as it implies strength, resilience and the capacity to survive. However, it is the individual’s choice how they wish to identify themselves.

Strategic Partner: an organisation with which FHF aligns for the purposes of furthering development or health objectives but does not receive funding from FHF.

Transactional Sex means the exchange of money, employment, goods or services or other benefits for sex or sexual acts including sexual favours.

CONTROL OF DOCUMENTATION

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Document Name	Safeguarding People Policy		
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Approval Body	Board		
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Related Policies	GOV-006 Speak-Up Policy; GOV-007 Human Rights, Equity & Inclusion Policy; GOV-012 Environmental Sustainability Policy; GOV-008 Financial Crime Policy; OPR-001 Communications & Transparency Policy		

References

ANNEXURE 1 SAFEGUARDING CODE OF CONDUCT

The Fred Hollows Foundation has zero tolerance for and strongly condemns all forms of Harm to people, including all forms of Child Abuse, Sexual Exploitation, Abuse and Harassment, Bullying, Unlawful Discrimination, Victimisation and Vilification, and categorically states that it is unacceptable in any circumstance. We are committed to ensuring a safe environment and culture for those with whom we come in contact during the course of our work, Projects and activities including children, at-risk adults and all other people.

I commit to abiding by the standards set out in this Code of Conduct which requires me to act as follows:

Culture

1. Uphold a culture that supports Safeguarding People and the provision of a safe and inclusive workplace, projects and activities where all are treated with dignity, courtesy and respect.
2. Be respectful of people's rights, background, culture and beliefs and treat them equally regardless of gender, race, religious or political beliefs, age, physical or mental health, sexual orientation, family and social background and culture or economic status.
3. Safeguard people and FHF's reputation, interests and resources.

Prevention of harm and abuse

4. Not cause any person Harm including by way of Abuse, Bullying, Exploitation, Harassment including sexual harassment, Unlawful Discrimination, Retaliation, Victimisation or Vilification.
5. Treat individuals associated with FHF with respect.
6. Respect the privacy and confidentiality of personal information so that dignity and safety is not compromised.
7. Refrain from using language that is inappropriate, harassing, abusive, sexually provocative, discriminatory, demeaning or culturally inappropriate.
8. Not accept, receive or give inappropriate benefits, gains or gifts.
9. Not commit any criminal acts and follow relevant local, state and national law relating to Safeguarding People, Child Protection and labour.

Protection from Sexual Exploitation, Abuse and Harassment

11. Not engage in sexual activity with children (persons under the age of 18). Mistaken belief in the age of a child is not a defence.
12. Not exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour with anyone at any time. The use of transactional sex is prohibited.
13. Not engage in sexual relationships with community members, project participants or their family members, since they are based on inherently unequal power dynamics.
14. Not abuse a position of power or authority or gain any advantage by forming sexual relations in the workplace, including with other staff or any representatives of FHF engaged in our work.
15. Not engage in any commercially exploitative activities with children or at-risk adults including child labour or trafficking.

Conduct Requirements

In addition, ensure that in any dealing with children during the course of my work or visit, I:

16. Do not hit, mistreat or cause other Harm to children.
17. Wherever possible, ensure that another adult is present when working near children.

References

18. Refrain from inappropriate physical contact or provocative behaviour with children including not to hold, kiss, cuddle or touch a child in an inappropriate or culturally insensitive way.
19. Do not seek to make contact or spend time with any child outside the Project times.
20. Avoid acting in ways that shame, humiliate, degrade or otherwise perpetrate any form of psychological harm against a child including the use of language that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
21. Refrain from sleeping in the same room or bed as a child and do not invite unaccompanied children into my home/hotel or other private location, unless they are at immediate risk of injury or in physical danger.
22. Refrain from developing relationships with children that could be deemed exploitative or abusive in any way (including using or supporting the use of child labour such as hiring children for domestic labour).
23. Refrain from providing children with, or exposing them to, alcohol, tobacco or illegal drugs.
24. Not show favouritism to the exclusion of others including through the provision of gifts or inappropriate attention nor act in a way that shows unfair or differential treatment of children.
25. Nor will I encourage, support or condone the above conduct in others.
26. Not link my personal social media accounts to community members where we work, including children and At-Risk Adults, nor contact them outside working hours for non-work matters.
27. Will not use online platforms or social media to Groom children, Bully, Abuse, Sexually Harass other people, or damage FHF's reputation in any way.

Accountability and Transparency

28. Confirm there are no charges, convictions or other outcomes of an offence that relate to Abuse, Exploitation or any other Harm by me. If such confirmation cannot be provided, immediately disclose to FHF any such charges, convictions or outcomes.
29. Immediately report any Safeguarding Concern including suspected or actual breaches of this Safeguarding Code of Conduct, the Safeguarding People Policy or the law by either myself, any Representative, Implementing Partner, Strategic Partner, Representative or any other person to:
 - a. Email: speak-up@hollows.org
 - b. Phone/text: +61 418 814 609
 - c. WhatsApp: +61 418 814 609
 - d. The Global Safeguarding Manager: hoynugi@hollows.org
 - e. Speak to your Safeguarding Focal Points as listed on [FredNet](#) or as otherwise identified to you, immediately or within 24 hours (noting FHF has external reporting obligations within 24 hours depending on the nature of the breach).
 - f. Representatives may also use the online Safeguarding Concern Reporting Form at www.hollows.org/au/complaints

I have read and understand the Safeguarding People Policy and this Safeguarding Code of Conduct and agree to abide by it at all times to protect the people I may come into contact with through my work for and/or association with The Fred Hollows Foundation.

Signature:

Name:

Title/ Role/ Position:






Date:

References

ANNEXURE 2 REPORTING SAFEGUARDING MISCONDUCT FLOWCHART

SAFEGUARDING REPORTING AND RESPONSE FLOWCHART

This flowchart provides the steps that Project Participants, Communities and FHF Representatives should follow to raise a concern for any form harm to children (under 18), at-risk Adults and any adults who come in to contact with FHF representatives including staff, board members, volunteers, partners, volunteers, contractors, suppliers and any other person associated with FHF in the delivery of our work.

SAFEGUARDING MISCONDUCT	REPORT Immediately or within 24 hours	RISK REDUCTION	HOW WE WILL MANAGE YOUR REPORT
<p>If you have experienced, become aware of, are concerned about, observed or suspect FHF representative of:</p> <ul style="list-style-type: none"> Sexual exploitation, sexual abuse or sexual harassment Abuse of any type towards children associated with our work (under 18) or to individuals at risk of harm Behaviour that breaches FHF Safeguarding People Policy <p>YOU MUST REPORT!</p>	<p>Immediately or within 24 hours report to FHF Safeguarding Manager ALL allegations of abuse to children and SEAH towards adults by FHF personnel using one of the options below:</p> <ul style="list-style-type: none">  In person  Email speak-up@hollows.org  Mobile Phone / WhatsApp +61 418 814 609  Global Safeguarding Manager hoyugi@hollows.org  Safeguarding Focal Point Your local reporting mechanisms 	<p>If there is immediate danger, FHF will</p> <ul style="list-style-type: none"> Ensure Safety of the Survivor Child: Actions must be in the best interest of the child and reported to relevant local authorities immediately Adults: Referrals and actions are taken with the consent of the survivor respecting their choices Seek Medical or Police Support 	<p>Respond Quickly</p> <p>Investigate Confidentially</p> <p>All concerns will be taken seriously, investigated where it is safe to proceed in line with the below safeguarding misconduct investigation principles:</p> <ul style="list-style-type: none"> We will provide feedback on the outcomes of the investigation, as appropriate. Further support including but not limited to debriefing and counselling will be provided to those affected. <p>Possible outcome of your concern</p> <ul style="list-style-type: none"> Breach of Safeguarding People Policy can result in performance management or termination of employment or engagement. Criminal matters will be referred to relevant authorities. If the report relates to a donor funded project, it will immediately be reported to the donor.
<p>WHAT WILL HAPPEN WHEN YOU RAISE A SAFEGUARDING CONCERN</p>			
<ul style="list-style-type: none"> ✓ When a concern or complaint is raised, it is recorded and acknowledged in line with FHF procedures. An initial review is conducted to clarify information and assess immediate safety, risk, and support needs. Where required, appropriate safeguarding and support measures are put in place without delay. ✓ Based on this assessment, a decision is made on next steps, including whether the matter can be managed internally, referred, or requires a confidential investigation. Any investigation is conducted using a trauma-informed, impartial, and fair approach, with leadership, donor, and legal reporting obligations fulfilled as required. ✓ Throughout the process, a victim- and survivor-centred approach is maintained. Findings are reviewed, outcomes and actions are implemented, and appropriate feedback and follow-up support are provided. 			
<p>KEEPING EVERYONE SAFE Survivor-centred approach and survivor support Professionalism Due process No Retaliation Do No Harm Upholding of confidentiality</p>			

References

ANNEXURE 3 – SAFEGUARDING REPORTING FORM

Safeguarding Concern Reporting Form

If you have a concern, suspicion, or know about or have witnessed, or have been subject to an incident of Harm or Abuse of a Child, or Sexual Exploitation and Abuse and Harassment to an individual, perpetrated by anyone associated with FHF programs or operations, please let us know without fear of reprisal.

You can raise your concern through the following confidential mechanisms.

- a. speak-up@hollows.org
- b. +61 418 814 609
- c. WhatsApp +61 418 814 609
- d. Global Safeguarding Manager hoyugi@hollows.org
- e. Speak to your Safeguarding Focal Points as listed on FredNet or as otherwise identified to you, immediately or within 24 hours (noting FHF has external reporting obligations within 24 hours depending on the nature of the breach).

FHF representatives/ staff who witnesses or are informed of any potential breach of the Safeguarding policy must report your concern to your Safeguarding Focal Point or using the above mechanisms. Please confidentially complete the form below immediately or within 24 hours. The form should then be emailed to speak-up@hollows.org

Section A: Reporters Details

Details of the person reporting a concern: Your Information

Please share your details to be kept up to date with progress of the concern.

You can also choose to remain anonymous by not including your name. (Please note that if there is not enough information and contact details to obtain additional information, this may impact on FHF's ability to fully investigate.

First Name:

Last Name:

Country:

Best method of contact: Telephone:

Email:

In person:

Other:

Position (For FHF Representative):

References

Section B: Incident Details

<p>a. The person / persons the complaint/ incident is about (alleged perpetrator)?</p>
<p>Full Name:</p> <p>Position:</p> <p>Current location:</p> <p>Country:</p> <p>Other details:</p>
<p>b. Who did the incident/ concern happen to (survivor/ victim)? (if you are not the victim/survivor, ensure you have obtained their consent to share their details)</p>
<p>c. What happened? Or what do you suspect has happened?</p>
<p>d. When or during what duration did the incident occur?</p>
<p>f. Is the concern about harm or abuse to a <u>child</u> (Physical, Sexual, Emotional, Exploitation of Neglect) OR g. Misconduct relating to Sexual Exploitation, Abuse and Harassment of an <u>adult</u></p>
<p>f. If you need support, please let us know how we can help you?</p>
<p>g. How did you find out about the incident?</p>

References

