



Pacific Association of Supreme Audit Institutions (PASAI)

Child Protection Policy

Access to information

PASAI members, Donors, International and Regional Partners

PASAI Reference Number

PP_6_CPP_2016

Issued and effective

Approved by the Governing Board resolution of 1 August 2016.

Review

Policy reviewed in March 2022 and to be reviewed every two years [next review March 2024]

Content

PASAI and DFAT child protection policies
Practical steps for implementation
Child Protection Code of Conduct
Mandatory Reporting Process
Staff and management responsibilities

Applicable to

All PASAI office holders and staff

Issuer

Chief Executive for PASAI

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SECTION I – PURPOSE

1. The purposes of this policy are to:-
 - (a) Demonstrate how PASAI, across its operations, will ensure that children are protected from exploitation and abuse.
 - (b) Provide clear guidance to PASAI’s personnel about their responsibilities to protect children and how to report any concerns.
 - (c) Meet PASAI’s obligations to its development partners in relation to child protection.

SECTION II – SCOPE

2. This policy applies to all PASAI office holders (including Governing Board members); staff (including contractors and consultants¹); and personnel of member SAIs who participate in PASAI activities in-country.

SECTION III – COMPLIANCE STANDARDS

3. PASAI has adopted the DFAT-compliant child protection policy, which forms Attachment 1 of the Child Protection Policy for the Australian Government’s aid program (2013). The DFAT policy can be accessed at <https://www.dfat.gov.au/international-relations/themes/child-protection/Pages/child-protection>
4. The policy has 9 compliance standards, which are summarized as follows:
 - 4.1 The organization has a child protection policy that applies to all personnel, partners and subcontractors who are engaged to perform any part of a DFAT-funded activity.
 - 4.2 The organization has robust recruitment screening processes for all personnel in contact with children.
 - 4.3 The child protection policy includes a documented reporting procedure for child exploitation and abuse allegations and policy non-compliance, including sanctions for breaches.

¹ Meaning those engaged by PASAI under a contract for services, or those engaged by another organization (e.g. Asian Development Bank).

- 4.4 The organization provides child protection training for personnel.
- 4.5 The organization has a child protection code of conduct.
- 4.6 The child protection policy commits to preventing a person from working with children if they pose an unacceptable risk to children.
- 4.7 The organization's employment agreements contain sanctions for any employee who breaches the child protection code of conduct.
- 4.8 The child protection policy is subject to regular review.
- 4.9 The organization undertakes a risk assessment that covers all DFAT-funded activities that have contact with children, identifying any high risk activities and documenting steps being taken to reduce or remove those risks.

SECTION IV - PRACTICAL STEPS

- 5. PASAI's activities do not ordinarily involve contact with children. However, it is good practice for an organization such as PASAI to adopt a policy which acknowledges the risk to children in development-related activities and to take some basic steps to ensure that risks are identified and managed. If any activities could involve working with children, then enhanced requirements should apply.
- 6. Accordingly, this policy has a set of fundamental requirements that apply in all circumstances, and enhanced requirements which apply depending on the level of child protection risk and whether an activity could involve working with children.
- 7. The fundamental requirements are:
 - 7.1 All staff and consultants who are to be involved in any fieldwork activity on behalf of PASAI (i.e., involving travel within or outside New Zealand or their country of residence) must:
 - (a) undergo, as a condition of their employment or engagement, a criminal record check and verbal referee checks (as determined by the Chief Executive) in relation to their suitability to work with children (irrespective of whether they are likely to do so);

- (b) give a written undertaking that they have not been suspended or dismissed, received any formal reprimands or final warnings from, or been the subject of disciplinary action by, a previous employer or engaging entity related to work with a child or children under 18; or have received any formal cautions or been charged with any offence related to children;
- (c) sign the Child Protection Code of Conduct (**Appendix 1**), which acknowledges they have read and agree to comply with this Policy;
- (d) be given training material about the importance of child protection, and face-to-face training at the time of induction and at intervals of no more than 2 years thereafter; and
- (e) be provided with a copy of the mandatory reporting process (**Appendix 2**).

Notes:

(1) If a criminal record check under paragraph 7.1(a) is not possible or practicable in the individual's country of origin, or is unlikely to be reliable, the individual must complete a statutory declaration to the effect that he or she has no criminal convictions involving children.

(2) Face-to-face training may be undertaken in person at the Secretariat office or, if that is not practicable (for example because a consultant is not resident in New Zealand) by Skype video call, through an interactive webinar prepared for the purpose, or by other suitable means. It must allow for the asking and answering of questions, and the provision of explanations. The training must be delivered by the Chief Executive, or a staff member or other person delegated by the Chief Executive who has the requisite knowledge of this policy and the DFAT Child Protection Policy.

- 7.2 Compliance with the Child Protection Code of Conduct is expressly mentioned in PASAI's employment agreements and individual consultant contracts, with a breach of the Code being serious misconduct making the individual liable for summary suspension pending an investigation, and dismissal or termination if misconduct is established.
- 7.3 Each member of the Governing Board must, on appointment, be given a copy of this Policy and sign the Child Protection Code of Conduct.
- 7.4 All personnel attending a PASAI activity (such as a workshop or Congress), whether from a member SAI or otherwise, must be given a copy of this policy and sign the Child Protection Code of Conduct as a condition of their attendance. The Secretariat must take all practical steps to enable this to happen, e.g. by providing sufficient copies of the Code of Conduct for signature.

- 7.5 When PASAI engages with another organization to deliver or participate in a PASAI activity which is funded (either directly or indirectly) by DFAT, the contract or MoU for the engagement must draw attention to the DFAT child protection policy and its application to all DFAT-funded activities. The other organization will be required to comply with the relevant standards, to the extent they are applicable.
 - 7.6 Child protection risks are actively managed through PASAI's Risk Register.
 - 7.7 In respect of each PASAI activity to be performed outside New Zealand, the Chief Executive will assess the child protection risk and determine whether additional measures or risk mitigations are required in relation to the activity.
8. The enhanced requirements are:
- 8.1 If any staff are to be engaged specifically for work that could involve children, additional screening procedures will be implemented in accordance with the DFAT child protection policy. That will require, at a minimum, an interview with behavioural-based questions.
 - 8.2 If any PASAI activity could involve contact or working with children, all participants in the activity (including Governing Board members or personnel of a member SAI or another organisation, whether as presenters or trainers or just as attendees) must comply with clause 7.1(a) and (b) (with necessary modifications).
 - 8.3 The Chief Executive must prepare, or task a staff member to prepare, a risk management plan for the activity, including identification of activity-related risks and mitigation steps, and ensure the plan is actively monitored throughout the relevant activity.
9. PASAI will also periodically take steps (for example through its website and Bulletins) to draw its member SAIs' attention to the importance of child protection and the DFAT policy, so that members can take their own responsibility to educate and inform their personnel of the DFAT Policy before participating in PASAI activities.

SECTION V - RESPONSIBILITIES

10. Each staff member is expected to be aware of this policy (including the DFAT child protection policy) and take positive steps to comply with it.

11. The Office Coordinator is responsible for holding a register of signings of the Child Protection Code of Conduct.
12. The Chief Executive has overall responsibility for this policy and its implementation.
13. Through the Chief Executive, the Secretariat is responsible for immediately notifying DFAT of any allegation and/or incident involving a child.

SECTION VI – EFFECTIVE DATE

The Policy is effective as of 1 August 2016 in accordance with the Governing Board resolution of 1 August 2016.

SECTION VII – REVIEW DATE

The Policy was reviewed and adopted by the Governing Board in March 2022. The Policy is to be reviewed after two years from this last review date.

SECTION VIII – ISSUER

The Issuer of this Policy is the Chief Executive for PASAI.

SECTION IX – CONTACT AND ACCESS

1. **Contact.** For questions relating to this Child Protection Policy, please contact PASAI Secretariat at secretariat@pasai.org.
2. **Access.** The Policy can also be accessed at <http://www.pasai.org>

SECTION IX – RELATED DOCUMENTS

- i. PASAI Charter
- ii. PASAI Incorporated Rules
- iii. PASAI Governance Code
- iv. PASAI Governance and Operational Policy
- v. PASAI Human Resources Policy
- vi. PASAI Health and Safety Policy
- vii. PASAI Child Protection Policy
- viii. PASAI Fraud Control Policy
- ix. PASAI Gender Policy

- x. PASAI Code of Conduct
- xi. PASAI Conflict of Interest Policy
- xii. PASAI Procurement Policy
- xiii. PASAI Contract Management Policy
- xiv. PASAI Risk Management Policy
- xv. PASAI Whistleblowing Policy
- xvi. PASAI Investment Policy
- xvii. PASAI Minutes of Governing Board meetings policy
- xviii. PASAI Communication Strategy
- xix. PASAI Guidelines on use of Social Media
- xx. PASAI Sexual Harassment Policy
- xxi. PASAI Gifts, Hospitality & Entertainment Policy

Appendix 1



Pacific Association of Supreme Audit Institutions (PASAI)

Child Protection Code of Conduct

I, _____, acknowledge that I have been given, and have read and understand, PASAI's Child Protection Policy, and the Child Protection Policy for the Australian Government's aid program which is referred to therein. I undertake to comply with PASAI's Child Protection Policy at all times.

I agree that, whenever I am involved in any fieldwork for PASAI (i.e., involving travel outside New Zealand or my country of residence), I must:

(a) if my duties could involve working with children, comply with the requirements of PASAI's Child Protection Policy in respect of criminal record checks, vetting, and induction and training; and

(b) irrespective of whether my duties involve working with children:

- treat children with respect regardless of race, colour, gender, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth 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 intercourse or sexual activity, including paying for sexual services or acts
- wherever possible, ensure that another adult is present when working in the proximity of children
- not invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger
- not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible
- use any computers, mobile phones, video cameras, cameras or social media appropriately, and never 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 New Zealand, 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, which occurred before or occurs during my association with PASAI that relate to child exploitation and abuse.

When photographing or filming a child or using children's images for work-related purposes, I must:

- assess and endeavour to comply with local traditions or restrictions for reproducing personal images 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. As part of this I must explain how the photograph or film will be used
- 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 PASAI, to use common sense and avoid actions or behaviours that could be construed as child exploitation and abuse.

Signed _____

Dated _____

Appendix 2



Pacific Association of Supreme Audit Institutions (PASAI)

Child Protection: Mandatory Reporting Procedure

This procedure applies to all PASAI office holders (including Governing Board members) and staff (including contractors and consultants) when working on PASAI business or as a representative of PASAI.

What should I report?

You should report:

- any behaviour that you suspect may be child exploitation and abuse, including possession of child exploitation material, or policy non-compliance by:
 - a PASAI staff member or representative
 - a person participating in an event organized by PASAI.
- any report made to you by anyone relating to child exploitation and abuse or policy non-compliance by a member of PASAI's staff or a person participating in an event organized by PASAI.

What if I am not sure what I have seen is child exploitation and abuse?

Contact the Chief Executive of PASAI, or the Child Protection Compliance Section of DFAT Australia, for confidential advice and further information about what constitutes child exploitation and abuse or policy non-compliance. See the contact details below.

How do I make a report?

Reports can be made by email or telephone to one of the contacts below.

You should provide as much information as possible, including the date and place of the incident, the person involved, and whether the matter has been reported to local law enforcement authorities.

What happens to the information I provide?

All information provided will be treated confidentially in accordance with relevant privacy legislation of New Zealand or Australia.

Contact details

PASAI: Chief Executive of PASAI (secretariat@pasai.org , +64 9 3041894)

DFAT: Child Protection Compliance Section (childprotection@dfat.gov.au).