

Protection and Safeguarding Policy (including Protection, Preventing Sexual Exploitation and Abuse and Child Safeguarding)

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1. POLICY STATEMENT

Family Planning NSW (FPNSW) is committed to the safeguarding of children and vulnerable adults and recognises that in the international development setting the protection of children and vulnerable adults faces particular challenges.

FPNSW has a zero tolerance to child exploitation and abuse and to sexual exploitation, abuse and harassment (SEAH). We believe everyone has the right to be safe at all times and are committed to the safety and wellbeing of all staff, partners, beneficiaries and volunteers. For all international development activities in which it takes part, FPNSW will take all measures necessary to ensure the rights of children and vulnerable adults to protection, safety and well-being.

We take a victim/survivor-centred approach that prioritises the rights, needs and wishes of victim/survivor in both the prevention and response to SEAH. This involves ensuring practices are accessible and relevant to the communities we work with and that complaints are investigated confidentially, sensitively and in a timely manner.

The Convention on the Rights of the Child informs FPNSW's work in the area of protecting children.

Our work aligns with the Department of Foreign Affairs and Trade (DFAT) principles and minimum standards for child protection and the prevention of SEAH. We will:

- assess and manage the risk in all activities in relation to child protection and SEAH
- work to build the capacity of partner organisation and staff to understand their safeguarding and protection responsibilities
- prohibit transactional sex for all personnel, while engaged in the direct delivery of FPNSW business
- prohibit fraternisation for all non-national personnel, while engaged in the direct delivery of FPNSW business

When SEAH or child exploitation and abuse, or policy non-compliance, is suspected or disclosed, internal reporting procedures will be followed and DFAT will be notified.

2. BACKGROUND / PURPOSE

There is international recognition that the nature of international development and humanitarian initiatives can exacerbate inequitable power dynamics within the communities which we work. Furthermore, adults who have a formal role in working with or supporting children are in positions of trust and authority. Children are dependent on adults to care for and protect them and all adults share the responsibility to prevent child exploitation and abuse. FPNSW recognises the importance of preventing child exploitation and abuse and SEAH and maintaining the highest professional and ethical standards.

This policy aims to:

- protect children and prevent SEAH by increasing accountability and outlining the responsibilities of FPNSW Board and staff, volunteers, partners and others in the relation to prevention, reporting and response to incidents of SEAH, and to implement processes that keep children and vulnerable adults safe

- create awareness of FPNSW’s commitment to the prevention of SEAH and to child safety, and encourage people to raise and manage issues and concerns in a fair and just manner
- engage with in-country partners and work collaboratively to build their capacity to keep children safe and prevent SEAH from occurring

3. DEFINITIONS AND ACRONYMS

Term	Meaning
Child	Any person under the age of 18 years unless a nation’s laws recognises adulthood later.
Child abuse	<p>It includes</p> <ul style="list-style-type: none"> - physical abuse—the use of physical force against a child that results in harm to the child. Physically abusive behaviour includes shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning - neglect—the failure by a parent or caregiver to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being - emotional abuse—inappropriate verbal or symbolic acts toward a child or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child’s self-esteem or social competence - sexual abuse—the use of a child for sexual gratification by an adult or significantly older child or adolescent. Sexually abusive behaviours can include fondling genitals, masturbation, oral sex, vaginal or anal penetration by a penis, finger or any other object, fondling breasts, voyeurism, exhibitionism and exposing the child to, or involving the child in, pornography (as defined under the Criminal Code Act 1995) - ill treatment – disciplining or correcting a child in an unreasonable and seriously inappropriate or improper manner; making excessive and/or degrading demands of a child; hostile use of force towards a child; and/or a pattern of hostile or unreasonable and seriously inappropriate degrading comments or behaviour towards a child. <p>Note: the above includes a child or children being present (hearing or seeing) while a parent or sibling is subjected to any of the above.</p> <p>Both men and women abuse children. Health workers, teachers other professionals and adults can all be responsible for child abuse.</p>
Child exploitation	<p>One of more of the following:</p> <ul style="list-style-type: none"> - Committing or coercing another person to commit an act or acts of abuse against a child - Possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material - Committing or coercing another person to commit an act or acts of grooming or online grooming <p>Using a minor for profit, labour, sexual gratification, or some other personal or financial advantage.</p>
Child protection	An activity or initiative designed to protect children from any form of harm, particularly arising from child exploitation and abuse.

Term	Meaning
Contact with children	Working on an activity or in a position that involves or may involve contact with children, either under the position description or due to the nature of the work environment.
Fraternisation	Any relationship that involves, or appears to involve, partiality, preferential treatment or improper use of rank or position including but not limited to voluntary sexual behaviour. It could include sexual behaviour not amounting to intercourse, a close and emotional relationship involving public displays of affection or private intimacy and the public expression of intimate relations.
Grooming	Generally refers to behaviour that makes it easier for an offender to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child, and then seek to sexualise the relationship (for example by encouraging romantic feelings, or exposing the child to sexual concepts through pornography).
Informed consent	Ensures the child and the parent or guardian understand the implications, purpose and potential uses of photographs or videos.
Online grooming	The act of sending an electronic message to a recipient who the sender believes to be under 16 years of age, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender; or of sending an electronic message with indecent content to a recipient who the sender believes to be under 16 years of age. Refer to the Criminal Code Act 1995.
Perpetrator	A person (or group of persons) who commits an act of SEAH or other type of crime or offence.
PSEAH	Prevention of sexual exploitation, abuse and harassment.
Safeguarding	The broad obligation on staff and partners to ensure that the design and delivery of FPNSW programs and organisational operations do not expose children or adult beneficiaries to adverse impacts, including the risk of abuse and exploitation, and that any concerns about children's or adult's safety with the communities where they work are appropriately responded to and reported.
SEAH	Sexual exploitation, abuse and harassment.
Sexual abuse	The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual offences including but not limited to: attempted rape (which includes attempts to force someone to perform oral sex); and sexual assault (which includes non-consensual kissing and touching). All sexual activity with someone under the age of consent (in the law of the host country or under Australian law [16 years], whichever is greater) is considered to be sexual abuse.
Sexual exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from sexual exploitation of another.
Sexual harassment	A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favours, or engages in other unwelcome conduct of a sexual nature, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended,

Term	Meaning
	humiliated or intimidated. Sexual harassment can take various forms. It can be obvious or indirect, physical or verbal, repeated or one-off and perpetrated by any person of any gender towards any person of any gender. Sexual harassment can be perpetrated against beneficiaries, community members, citizens, as well as staff and personnel.
Transactional sex	The exchange of money, employment, goods or services for sex, including sexual favours.
Victim/Survivor	A person who is, or has been, sexually exploited, harassed or abused.
Vulnerable adults	A person aged over 18 years who due to their gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.
Working with children	Working with children means being engaged in an activity with a child where the contact would reasonably be expected as normal part of the activity and the contact is not incidental to the activity. Working includes volunteering or other unpaid work.

4. SCOPE

All FPNSW staff including the CEO and board of directors, contractors, students and volunteers engaged in managing or delivering international projects.

All in-country partners and organisations contracted to deliver FPNSW international projects and their staff, contractors and volunteers.

5. POLICY DETAILS

FPNSW has adopted the principles from the DFAT Child Protection Policy and PSEAH Policy as guiding principles to reflect FPNSW's commitment to ensure the rights of children to protection, safety and well-being and to address SEAH.

5.1. Guiding Principles

Child Protection guiding principles

Principle 1: Zero tolerance of child exploitation and abuse

FPNSW has a zero tolerance approach to child exploitation and abuse. Such action attracts criminal, civil and disciplinary sanctions.

FPNSW will not knowingly engage—directly or indirectly—anyone who poses a risk to children. FPNSW works to minimise the risks of child exploitation and abuse associated with its functions and programs, and trains its staff and partners on their obligations under this policy.

Principle 2: Assess and manage child protection risk and impact

While it is not possible to entirely eliminate risks of child exploitation and abuse, careful management can identify, mitigate, manage or reduce the risks to children that may be associated with FPNSW functions and programs.

Principle 3: Sharing responsibility for child protection

To effectively manage risks to children, FPNSW requires the commitment, support and cooperation of FPNSW staff, contractors, volunteers and partner organisations who help to deliver programs managed by FPNSW.

Principle 4: Procedural fairness

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

Principle 5: Recognition of the best interests of the child

Australia is a signatory to the United Nations Convention on the Rights of the Child. FPNSW is committed to upholding the rights of the child and Australia's obligations under this Convention. In all actions concerning children the best interests of the child shall be a primary consideration.

PSEAH guiding principles

Principle 1: Zero tolerance of inaction

Sexual exploitation, abuse and harassment are never acceptable. FPNSW recognises that achieving a significant reduction in SEAH is a long-term endeavour. Reports of incidents may increase as we improve safeguards. Increasing reports may indicate growing awareness of SEAH and changing attitudes, with victims/survivors feeling more comfortable to report. Zero tolerance is defined as acting on every allegation in a fair and reasonable way with due regard for procedural fairness.

Principle 2: Strong leadership accelerates culture change

FPNSW recognises that strong leadership is essential in setting organisational culture. This involves modelling respectful behaviour and setting clear expectations to ensure communities are supported and victims/survivors feel safe to report concerns and trust that their allegations will be managed appropriately and confidentially. Strong leaders address SEAH by taking measures to improve diversity and inclusion and encourage scrutiny of their own behaviour and that of senior management.

Principle 3: Victim/survivor needs are prioritised

FPNSW has a "do no harm" approach which prioritises the rights, needs and wishes of the victim/survivor, while ensuring procedural fairness to all parties. This approach:

- treats the victim/survivor with dignity and respect
- involves the victim/survivor in decision making
- provides the victim/survivor with comprehensive information
- protects privacy and confidentiality
- does not discriminate based on gender, age, race/ethnicity, ability, sexual orientation, or other characteristics
- considers the need for counselling and health services to assist the victim/survivor with their recovery.

Principle 4: Preventing PSEAH is a shared responsibility

Preventing Sexual Exploitation, Abuse and Harassment is everyone's responsibility. To effectively manage risks to children, FPNSW requires the commitment, support and cooperation of FPNSW staff, contractors, volunteers and partner organisations who help to deliver programs managed by FPNSW.

Principle 5: Gender inequality and other power imbalances are addressed

Power imbalances and gender inequalities can increase the risk of SEAH for particular groups. Available data indicates that the majority of SEAH victims/survivors are female and the majority of perpetrators are male. However, there are also other power imbalances at play. Inequalities based on the distinctions of worker/beneficiary; ability/disability; ethnic and Indigenous status; religion; gender identity and sexual orientation; age; health and poverty, can also result in SEAH.

Principle 6: Stronger reporting will enhance accountability and transparency

SEAH is a failure of responsibility. The organisations and individuals who deliver FPNSW's business are not only accountable to FPNSW and our donors, but also to the communities, customers and clients for whom the business is intended. Stronger reporting and awareness throughout the organisation will improve systems and safeguards accordingly.

5.2. Risk based approach

FPNSW will take a risk-based approach to child protection and PSEAH by establishing the risk context of all international projects and activities. A full risk assessment will be conducted if the project or activity is working with vulnerable or at-risk populations, or if the project or activity is identified as 'working with children', as per the FPNSW Child Safeguarding Procedure. FPNSW staff will assess the level of risk of sexual exploitation, abuse or harassment occurring and will apply the PSEAH Minimum Standards (Appendix 1).

Risk assessments are managed in accordance with FPNSW Risk Management Framework following the principles of AS/NZ 31000:2009 International Standard on Risk Management.

The risk assessment will take place as part of the Partnership Capacity Assessment with a new partner, at the start of a newly funded project, or when any significant change occurs within the partner organisation.

Risk management strategies and safeguarding will be assessed and identified in the project design and documented in the project plan and Memorandum of Understanding. This will then be monitored during regular reporting, monitoring visits and communication with partners.

5.3. Recruitment

FPNSW aims to recruit and select people who are committed to safeguarding of all people who our projects and work come into contact with. FPNSW will ensure robust screening processes for all staff working in the International Programme. This includes ensuring a criminal record check and a Working with Children Check is provided prior to engagement and verbal referee checks are performed and documented.

FPNSW will support in-country partners to identify ways applicants can be screened when recruiting project staff.

5.4. Code of Conduct

All FPNSW staff engaged in the management and implementation of international projects will be inducted to and are required to comply with the FPNSW Protection and Safeguarding Code of Conduct on an annual basis. The Code of Conduct is a commitment to and to child protection professional behaviors and PSEAH (Appendix 2) as part of their duties.

5.5. Strengthening capacity of FPNSW Board, staff, contractors and volunteers

FPNSW will ensure that all staff involved in the management and implementation of international projects are provided with appropriate orientation and training to the policy prior to involvement in any international project activities.

5.6. Use of images of children

FPNSW will ensure that images and messages used in marketing and fundraising portray children in a dignified, respectful, honest and culturally appropriate way.

Images will only be taken and used with informed consent of an adult, parent or guardian. Images will be saved in a repository with appropriate electronic security to ensure they are only accessible to approved staff members.

Further details on the use of images of children can be found in the FPNSW Media Policy.

5.7. Working with partners and contracts

FPNSW extends the Protection and Safeguarding Policy requirements to in-country partners, staff and volunteers of partners and contractors. In-country partners must ensure any downstream organisations including individual subcontractor complies with these policies.

An individual contractor is required to sign the Protection and Safeguarding Code of Conduct as part of their contract of engagement.

5.8. Reporting of concerns and incidents

FPNSW responds seriously to all concerns raised of suspicion or disclosure of exploitation, abuse, or harassment and Code of Conduct and policy non-compliance. All people involved in any report or investigation will be treated fairly and their rights respected. All reports will be handled professionally, confidentially and in a timely manner.

FPNSW staff will follow the FPNSW Child Safeguarding Procedure and the FPNSW Feedback and Complaints Policy, including the Incident Management procedures for reporting. All suspected reports of exploitation and abuse of children, or concerns about child welfare will be reported to the DFAT [Child Protection Compliance Section](#). All suspected exploitation, abuse, harassment or concerns about the welfare of a vulnerable person outlined within this policy will be reported to the DFAT PSEAH Compliance Section (seah.reports@dfat.gov.au) using the DFAT [Incident Notification Form](#).

6. MONITORING, EVALUATION AND REVIEW

Child Protection and SEAH protection indicators are included in the FPNSW Development Effectiveness Framework. These are then included in project design and planning where appropriate.

FPNSW is responsible for supporting in-country partners to measure and report their activities against these indicators.

The Chief Executive Officer will report to the FPNSW Board and International Program Advisory Committee on compliance with this policy and incidents, risks and issues in its implementation on an annual basis.

The policy will be reviewed every five years or earlier as necessary.

7. ASSOCIATED DOCUMENTS

7.1. FPNSW policies and procedures

- FPNSW Incident Management
- FPNSW Code of Conduct and Ethics
- FPNSW Recruitment, Selection and Appointment Policy
- Family Planning NSW Disciplinary Action Policy
- FPNSW Media Policy
- FPNSW Feedback and Complaints Policy
- FPNSW Whistleblowing Policy
- FPNSW Child Protection Procedure

7.2. Forms

- Family Planning NSW Memorandum of Understanding template
- Incident Reporting form
- Protection and Safeguarding Code Of Conduct

8. REFERENCES

- DFAT Child Protection Policy 2019, *Department of Foreign Affairs and Trade website* – www.dfat.gov.au
- ACFID Code of Conduct Guidelines for the Development of a Prevention of Sexual Exploitation, Abuse and Harassment Policy 2019
- ACFID Code of Conduct Guidelines for the Development of a Child Protection Policy 2016
- DFAT Guidance Note: Assessing Risk, *Department of Foreign Affairs and Trade website* – www.dfat.gov.au
- Establishing Child Protection Risk Context, *Department of Foreign Affairs and Trade website* – www.dfat.gov.au
- DFAT Guidance Note: Use of Images and Social Media, *Department of Foreign Affairs and Trade website* – www.dfat.gov.au
- DFAT Child Protection Guidance Note: Education Programs 2017, *Department of Foreign Affairs and Trade website* – www.dfat.gov.au

- DFAT Child Protection Guidance Note: Health Activities 2018, *Department of Foreign Affairs and Trade website* – www.dfat.gov.au
- DFAT Child Protection Guidance Note: Monitoring and evaluation 2017, *Department of Foreign Affairs and Trade website*
- DFAT Child Protection Guidance Note: Women’s Economic Empowerment 2017, *Department of Foreign Affairs and Trade website* – www.dfat.gov.au
- Australian Council for International Development (ACFID) Code of Conduct 2017
- United Nations Convention on the Rights of the Child
- NSW Child Protection (Working with Children) Act 2012

9. Appendix 1: PSEAH Minimum Standards

These minimum standards have been drawn from the DFAT policy. The DFAT Policy takes a risk-based, proportional approach to PSEAH. Partners are asked to assess the level of risk for SEAH occurring, and apply minimum standards accordingly.

Minimum Standard	Organisation	Individuals	Low Risk	Med Risk	High Risk	Very High Risk
1. Have a PSEAH policy or other documented policies and procedures in place and clearly communicate expectations of this Policy.	Must have a PSEAH policy or other documented policies and procedures in place, which clearly meet the expectations of this Policy.	Sign a document outlining appropriate and enforceable standards of conduct, compliant with the requirements of this Policy	Yes	Yes	Yes	Yes
2. Have reporting and investigation procedures in place.	The PSEAH policy documents how SEAH incidents will be managed, reported and investigated. Reporting and investigation processes must include engagement of and reporting to senior management and executive boards.	Through a document which outlines appropriate and enforceable standards of conduct, confirm awareness of DFAT's PSEAH reporting requirements for concerns or incidents and policy non-compliance.	Yes	Yes	Yes	Yes
3. Have risk management processes that include the risk of SEAH.	Have effective risk management processes that include consideration of the risk of SEAH. The process must document the controls already in place or to be implemented to reduce or remove risks.	Must meet the reporting requirements under their agreement, aligned to DFAT's PSEAH Policy.	No	Yes	Yes	Yes
4. Effective PSEAH training in place.	PSEAH training for personnel, including downstream partners and individuals that deliver DFAT business.	Complete PSEAH training and provide evidence of this.	No	No	Yes	Yes
5. Recruitment and screening processes and employment practices address and manage the risk of SEAH.	Can demonstrate robust PSEAH recruitment and screening processes for all personnel/consultants including having in place appropriate and enforceable standards of conduct.	Based on a risk assessment, assurances could include police check, working with vulnerable people check that provides assurance reasonable SEAH precautions have been taken. Local requirements must also be followed.	No	No	Yes	Yes
6. Prohibit transactional sex for all personnel.	Prohibits transactional sex in the field for all staff and downstream partners while engaged	Employment agreements include clauses prohibiting transactional sex	No	No	No	Yes
7. Prohibit fraternisation for all non-national personnel.	Prohibits fraternisation for all non-national personnel in the field while engaged	Employment agreements include clauses prohibiting fraternisation for all non-national individuals	No	No	No	Yes

10. Appendix 2: Protection and Safeguarding Code of Conduct

I, _____, acknowledge that I have read and understand the

- DFAT Affairs and Trade *Prevention of Sexual Exploitation Abuse and Harassment Policy*
- *Family Planning NSW Protection and Safeguarding Policy*

I agree that in the course of my work, I must

- Prohibit any form of sexual exploitation, abuse and harassment activity
- Report any suspected or alleged cases of sexual exploitation, abuse or harassment within the scope of the Policy in line with Family Planning NSW policies and procedures
- Maintaining an environment in which beneficiaries, volunteers, staff, contractors and other representatives know expected behaviours and how to raise complaints and concerns
- Will treat all beneficiaries with respect and not use language or behave towards them in an inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate manner
- Will always strive to create and maintain an environment that promotes adherence to and implementation of this Policy
- Will not exchange money, employment, goods or services, protection or assistance for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour
- Prohibit transactional sex and fraternization for all non-nation individuals while engaged in the delivery of Family Planning NSW business
- Will commit to communicating prevention of sexual exploitation, abuse and harassment expectations to partners
- Any concern or suspicion regarding possible violation of the policy will be reported within 48 hours and any all alleged Policy non-compliance will be reported within five working days
- Will take all reasonable steps commensurate with their role to prevent, oppose and combat all sexual exploitation, abuse and harassment
- Conduct that is criminal will be reported to the relevant authorities, both in Australia and countries where we work, where it is safe to do so and is in accordance with the wishes of victims/survivors.
- Failure to comply with these standards is grounds for disciplinary action, and may be considered as gross misconduct resulting in termination of contract or agreement.

I agree that in the course of my work, I must

- treat all children with respect
- 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 18¹ in any form of sexual intercourse² or sexual activity,³ including paying for sexual services
- wherever possible, ensure that another adult is present when working near children
- not invite unaccompanied children into private residences, unless they are at immediate risk of injury or in physical danger
- not sleep close to unsupervised children unless absolutely necessary, in which case the supervisor's permission must be obtained, and ensuring that another adult is present if possible (noting that this does not apply to an individual's own children)

¹ Where the child is 16 years or older and the other party is not more than 2 years older; and it can be established that the child consented to the relationship, an exception can be recorded promptly on personnel files.

² As defined under the *Criminal Code Act 1995*.

³ As defined under the *Criminal Code Act 1995*.

- not supply alcohol and/or illicit drugs to children under the age of 18 years
- discriminate against, show differential treatment to, or favour particular children or young people to the exclusion of others (this includes not giving gifts to individuals or groups of children unless it is a planned and assessed part of a program)
- not hold, kiss, cuddle or touch a child in an inappropriate, unnecessary or culturally insensitive way.
- never use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material through any medium
- not use physical punishment on children
- not hire children for domestic or other labour: which is inappropriate given their age or developmental stage; which interferes with their time available for education and recreational activities; or which places them at significant risk of injury
- comply with all relevant Australian and local legislation, including labour laws in relation to child labour
- immediately report concerns or allegations of child exploitation and abuse and policy non-compliance in accordance with appropriate procedures
- immediately disclose all charges, convictions and other outcomes of an offence that relates to child exploitation and abuse, including those under traditional law, which occurred before or occurs during association with DFAT
- be aware of behaviour and avoid actions or behaviours that could be perceived by others as child exploitation and abuse

When photographing or filming a child or using children’s images for work-related purposes:

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

Signed:.....

Date:

Witness Signed:.....

Date: