



Australian Government
Department of Foreign Affairs and Trade



Child Protection Policy

SEPTEMBER 2025



Visit to Na Haidiew Primary School, Vientiane Lao. Photo credit: Sarah Friend
FRONT COVER IMAGE: School children, Kiribati. Photo credit: Lorrie Graham

INTRODUCTION

The Department of Foreign Affairs and Trade (DFAT) has a zero-tolerance approach to child exploitation, abuse and harm. As a signatory to the **Convention on the Rights of the Child** (UNCRC), Australia is committed to upholding children's rights and takes proactive measures to prevent, identify and respond to safeguarding risks. DFAT implemented its first child protection policy in 2008 and continues to strengthen its commitment to child safety. This updated Policy aligns with the **Commonwealth Child Safe Framework** and the **National Principles for Child Safe Organisations**.

Child exploitation, abuse and harm are a violation of children's rights and are an abuse of power that causes profound harm to individuals, families and communities. Forms of exploitation, abuse and harm may include physical abuse, sexual abuse, emotional abuse, neglect, trafficking, child labour, child marriage and female genital mutilation, or situations where a child is a witness to any of the above. Exploitation and abuse can also occur online. Globally, there has been an increase in cyber abuse, including viewing, producing or distributing child abuse material. DFAT commits to embedding child protection across all areas of its work to minimise the risks of child exploitation, abuse and harm.

The Child Protection Policy (the Policy) applies to all DFAT business in Australia and overseas, including to all DFAT staff, DFAT partners and downstream partners. This Policy should be read in conjunction with the **DFAT Protection from Sexual Exploitation, Abuse and Harassment Policy**. It aligns with **International Disability Equity and Rights Strategy**, **International Gender Equality Strategy**, **International Engagement Strategy on Human Trafficking and Modern Slavery** and DFAT's Enterprise Risk Management Policy.



A group of children go through the interactive learning process at the Electoral Educational and Information Centre, Nepal. Photo credit: Jim Holmes

PURPOSE

The Policy establishes DFAT's framework for safeguarding children across DFAT business, ensuring that all DFAT staff and partners proactively prevent, mitigate and respond to child exploitation, abuse and harm. A risk-based and intersectional approach must be applied to child protection, recognising that factors such as context, gender, race, ethnicity, disability, sexual orientation, socio-economic status and systemic marginalisation can increase vulnerabilities and shape safeguarding needs.

In summary, DFAT staff and partners are expected to:

- prevent child exploitation, abuse and harm by embedding child protection into all DFAT business
- promote accountability by monitoring and managing risks and ensuring compliance with the Policy
- create safe and accessible reporting mechanisms for raising concerns without fear of retaliation
- report any incidents, allegations or suspicions of child exploitation, abuse and harm
- respond effectively to child protection reports, prioritising child victim-survivor rights and wellbeing and holding perpetrators to account
- comply with relevant Australian and/or local legislation.

SCOPE

The Policy applies to all DFAT business. This includes, but is not limited to, the business carried out by partners and contractors working across Development and Humanitarian programs, Foreign Policy and Diplomacy, Corporate, Trade, Passports, Consular Services, Scholarships and Fellowships, Volunteers, Labour Mobility and Public Diplomacy activities.

DFAT staff: Employees under the *Public Service Act 1999*, locally engaged staff, independent contractors, and family members of DFAT staff visiting, or residing in, DFAT premises.

DFAT partners: Managing contractors, corporate suppliers, universities, non-government organisations, research institutions, multilateral organisations, international organisations, grant recipients, and all downstream partners engaged in DFAT business, as well as Australian government and bilateral partners who have agreements in place with DFAT (funded and unfunded).

Australian Government and partner governments, multilateral organisations and regional bodies are expected to act in accordance with the principles outlined in this Policy. They must also adhere to their own legislation, regulations, policies and the UNCRC. DFAT works collaboratively with these partners to enable alignment with the Policy's principles and to integrate child protection measures into joint initiatives, agreements and frameworks.

Individuals: Including but not limited to scholarship, fellowship and mobility grant recipients, volunteers, alumni, labour mobility participants and other grant recipients.

KEY DEFINITIONS

Child or children: DFAT defines a 'child' as a person below the age of 18.

Child exploitation refers to one or more of the following actions:

- 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 an act of grooming, including online grooming
- using a child for profit, labour, sexual gratification, trafficking, forced labour, or any other personal or financial advantage.

Child abuse includes physical abuse, emotional abuse, sexual abuse, ill-treatment, neglect, and online or digital abuse. It also includes a child or children witnessing such abuse against another child or adult.

Harm refers to any detrimental effect on a child's physical, psychological or emotional wellbeing. Harm may be caused by financial, physical or emotional abuse, neglect, and/or sexual abuse or exploitation whether intended or unintended.

Victim-survivor: Child victim-survivor is a term used to describe a person under the age of 18 who is, or has been, abused, exploited or harmed. 'Victim-survivor' acknowledges both the harm suffered (victim) and the resilience or agency of the child in coping with the aftermath (survivor). This term emphasises a supportive, rights-based approach to addressing their needs and upholding their dignity throughout the reporting and response process.

Child harm can be perpetrated against beneficiaries of DFAT programs, community members, and against citizens and non-citizens.

What is safeguarding?

Safeguards are measures taken to avoid or minimise

the potential negative impacts of DFAT's operations, business activities and development programs on the communities and the environments in which we work and operate. In the context of this Policy, DFAT seeks to promote child safety and minimise the risks of harm to children in its operations.



A group of students in Papua New Guinea doing a reading and comprehension activity. Photo credit: DFAT

PRINCIPLES

The Policy is underpinned by the following principles. The principles reflect DFAT's commitment to the **Commonwealth Child Safe Framework** and the **National Principles for Child Safe Organisations**.

Principle 1: Zero tolerance for child exploitation, abuse and harm

DFAT has zero tolerance for child exploitation, abuse and harm in all aspects of its work. This means zero tolerance for acts of child exploitation, abuse and harm and zero tolerance for inaction to prevent, report or respond to child exploitation, abuse and harm.

Principle 2: Prioritise the best interests of the child

DFAT and partners must ensure that all actions and decisions prioritise children's rights, safety and wellbeing and are underpinned by a 'do no harm' approach. Responses to incidents must be trauma-informed, child-centred and enable access to support services.

Principle 3: Promote inclusion and equity and recognise diversity

DFAT and partners must be welcoming and inclusive of all children regardless of their circumstances, abilities, sex, gender, sexual orientation, ethnicity, age, displacement, and social, economic and cultural backgrounds. Efforts must address barriers to participation, protection, reporting and support such as language, safety, discrimination and accessibility.

Principle 4: Prioritise prevention

DFAT and partners must be proactive in promoting the safety of children and minimising risks to children. Actions to protect children must be embedded in policies, programs, recruitment, staff training and daily operations to minimise risks and protect children, both in physical and online spaces.

Principle 5: Adopt an empowering and participatory approach

DFAT and partners must empower children to understand their rights, express concerns, and participate in decisions affecting them in ways that are age-appropriate, voluntary and safe. Families and communities must be engaged as partners in promoting child safety and wellbeing, fostering trust and enhancing collaboration.

Principle 6: Reporting incidents is mandatory

DFAT requires mandatory and immediate reporting of child protection concerns related to DFAT business (funded and unfunded). Reporting and response mechanisms must be clear, accessible (including to children) and confidential. Reporting mechanisms must ensure that those who raise concerns are protected and that concerns are addressed effectively and in a timely and appropriate manner.

Principle 7: Embed safeguarding into organisational culture and leadership

DFAT and partners must embed child protection in governance, leadership and institutional culture. A strong safeguarding culture requires clear accountability, leadership commitment, investment of resources and continuous review and improvement of policies and practices.

RISK-BASED APPROACH

The Policy applies a risk-based approach, ensuring that Child Protection Standards are proportionate to risk and expected level of contact with children, as per the table below. Further guidance and details on the Standards and the risk-based approach are provided in Attachment A: *Child Protection Standards for DFAT Partners* and in the *Child and Adult Safeguards Implementation Handbook*.

Level of Contact	Definition	Child Protection Standards Required
No contact with children	Activities with no anticipated interaction with children	None
Incidental or minimal contact with children	Activities where interaction with children is limited, indirect or incidental	Essential Standards
Direct, sustained or significant contact with children	Activities involving regular or ongoing interaction with children	Comprehensive Standards



Children at play, Manado, Indonesia. Photo credit: Ben Pederick, Good Morning Beautiful Films

ROLES AND RESPONSIBILITIES

DFAT staff must:

- adhere to the principles of this Policy as well as the internal DFAT Unacceptable Workplace Behaviour Policy
- comply with DFAT's mandatory reporting requirements and any mandatory reporting requirements to law enforcement as required by legislation
- incorporate child protection into the due diligence processes for partners
- include mandatory Child Protection clauses in all agreements, grants and contracts
- undertake child protection risk assessments
- monitor partner compliance with this Policy
- comply with relevant Australian and/or local legislation.

All DFAT staff working with children must complete *DFAT's Child Protection e-Learning* and acknowledge the *Child Protection Professional Behaviours Declaration*.

The Child Protection Standards for DFAT partners outlined in Attachment A do not apply to DFAT staff.

DFAT partners must:

- adhere to the principles of this Policy
- comply with DFAT's mandatory reporting requirements and any mandatory reporting requirements to law enforcement as required by legislation.
- comply with relevant Australian and/or local legislation
- take a risk-based approach in applying the Child Protection Standards as per the level of contact with children (Attachment A)
- put controls in place to manage and monitor the risk of child harm and ensure processes are adhered to.

Individuals contracted by DFAT or partners or receiving DFAT-funded grants, scholarships or fellowships, and volunteers must:

- sign and adhere to a code of conduct aligned with DFAT's Child Protection Code of Conduct
- comply with DFAT's mandatory reporting requirements
- if in 'direct, sustained or significant contact' with children, provide a recent police check, working with children/vulnerable people check or a locally appropriate alternative
- comply with relevant Australian and/or local legislation.

REPORTING

Mandatory **immediate** reporting (within 24 hours) requirements apply to all DFAT staff and partners. Mandatory reporting includes any **suspected, alleged or known** incidents of child exploitation, abuse and harm related to DFAT business. Failure to report in accordance with this Policy may result in disciplinary, contractual or legal consequences.

How to Report

Reports must be submitted via childprotection@dfat.gov.au preferably using the **DFAT Incident Notification Form**.

Anyone can report an incident or concern to DFAT. Anonymous reports are permitted; however, DFAT may have limited ability to follow up on the report.

Victim-survivors and their families may report directly to DFAT at any time if they choose. Reporting is not mandatory for victim-survivors. However, we encourage reporting to enable support and care to be provided.

All information provided to DFAT will be handled in accordance with the **Privacy Act 1988**.

For further guidance on reporting and response, see *the Child and Adult Safeguards Implementation Handbook*. For all inquiries regarding reporting, please contact childprotection@dfat.gov.au.

Additional obligations under Australian and overseas law may apply to report incidents of child harm to law enforcement. Australians should be aware of their obligations to report under appropriate Commonwealth, State and Territory legislation, including its extraterritorial application. Seek independent legal advice.

Reports in relation to DFAT staff

Reports in relation to DFAT staff/family members as victim-survivors or perpetrators can be reported to conduct@dfat.gov.au.

DFAT staff obligations to report serious extraterritorial offences

DFAT staff, in Australia and overseas, must report any information relating to the commission or attempted commission of a serious extraterritorial offence under Australian law to the Transnational Crime Section (transnationalcrime@dfat.gov.au). For further guidance, see the Administrative Circular, *Australian extraterritorial offences and the responsibility to report*.

Reporting

Mandatory immediate reporting (within 24 hours) requirements apply to all DFAT staff and Partners. Mandatory reporting includes any suspected, alleged or known child exploitation, abuse and harm related to DFAT business.

Reports must be submitted via childprotection@dfat.gov.au

COMPLIANCE WITH THIS POLICY

DFAT will monitor compliance with the Policy through a range of approaches including contractor performance assessments, reviews, non-government organisation accreditation processes and due diligence assessments. DFAT partners and contractors are expected to put in place appropriate measures to ensure they comply with this Policy.

Non-compliance with requirements may lead to DFAT suspending or terminating an agreement.

LEGISLATION RELEVANT TO CHILD PROTECTION

A range of laws are relevant to this Policy, including Australian Commonwealth, state and territory laws, and local laws in countries where DFAT works. A number of international child protection instruments also apply.

1. Relevant Australian legislation

Under Commonwealth law, an Australian citizen or resident can be prosecuted for an offence committed against a child in another country.

2. Local legislation

Countries in which DFAT operates may have legislation relating to child exploitation and abuse. When working in-country, DFAT staff, partners and individuals or the personnel of contractors and organisations undertaking activities funded by DFAT are required to abide by local legislation, including labour laws about child labour.

3. State and territory child protection legislation

State and territory laws provide legal protection to children and families that are affected by child exploitation and abuse that occurs in Australia.

4. Legal obligations to report child sexual offences

Section 66AA of the *Crimes Act 1900* (ACT) makes failure to report information to police an offence, where that information gives rise to a reasonable belief that a sexual offence has been committed against a child. This is a personal obligation for all people in the ACT and applies to DFAT posted officers. Comparable reporting requirements exist in other Australian states and territories.

For further information, please see the *Child and Adult Safeguards Implementation Handbook*.

CHILD AND ADULT SAFEGUARDS IMPLEMENTATION HANDBOOK

To support the implementation of the Child Protection Policy, DFAT has developed a *Child and Adult Safeguards Implementation Handbook* for DFAT staff and for DFAT partners. This Policy should be read in conjunction with the handbook, which includes more detailed guidance on assessing and managing child protection risks.

DATE OF EFFECT

The Policy is effective from **1 September 2025** and will be reviewed every five years. Lessons will be incorporated into subsequent versions. Questions or suggestions to strengthen the Policy may be sent to childprotection@dfat.gov.au.



ATTACHMENT A: Child Protection Standards for DFAT Partners

The DFAT Child Protection Policy applies a risk-based approach, ensuring that Child Protection Standards applied to DFAT business are proportionate to the risk and expected level of contact with children. This approach categorises three levels of contact with children, each with corresponding Child Protection Standards as outlined below:

Level of Contact	Definition	Child Protection Standards Required
No contact with children	Activities with no anticipated interaction with children	None
Incidental or minimal contact with children	Activities where interaction with children is limited, indirect or incidental	Essential Standards
Direct, sustained or significant contact with children	Activities involving regular or ongoing interaction with children	Comprehensive Standards

The determination of the appropriate level of contact with children, and therefore the Child Protection Standards that apply, is the responsibility of DFAT staff and partners. DFAT staff and partners must assess activities, as well as those of any downstream partners, to identify the level of contact with children and the associated risks. DFAT partners must document these assessments and continue to monitor for any change in the risk settings.

DFAT recognises that small, locally based organisations that have ‘direct, sustained or significant contact’ with children may need time and support to achieve full compliance with the Comprehensive Standards. In such cases, these organisations are required to implement the Essential Standards to mitigate immediate risks, while taking a phased implementation approach to gradually build capacity and comply with the Comprehensive Standards over a reasonable timeframe¹. Where these organisations are downstream partners, DFAT partners are responsible for ensuring any action plans are realistic, risk-sensitive and implemented within a reasonable timeframe. DFAT partners are also responsible for monitoring progress and providing technical assistance and capacity-building support where needed. This approach requires these organisations to:

- fully implement the Essential Standards to address immediate risks
- document an action plan outlining specific steps and clear timeframes to achieve compliance with Comprehensive Standards
- implement and monitor progress against the action plan to achieve compliance with Comprehensive Standards.

DFAT partners who are unable to meet the Standards within the required timeframe require the DFAT delegate’s approval. In seeking the delegate’s approval, the risks associated with non-compliance and a plan for mitigating those risks should be detailed.

Further guidance on assessing the Child Protection risks can be found in the Child and Adult Safeguards Implementation Handbook.

While the Child Protection Policy applies to individuals, the Child Protection Standards are primarily aimed at organisations. Individual recipients and awardees of scholarships, fellowships or grants, directly contracted individuals, and volunteers are instead required to:

1. sign and adhere to a code of conduct aligned with DFAT’s Child Protection Code of Conduct.
2. comply with DFAT’s mandatory immediate reporting requirements, including any mandatory reporting to law enforcement, and
3. if in ‘direct, sustained or significant contact’ with children, provide a recent police check, working with children/vulnerable people check, or a locally appropriate alternative.

¹ Reasonable timeframe should be determined by the DFAT officer and DFAT partner based on an assessment of the DFAT partner or downstream partner capacity, risk and context. ‘Reasonable’ could be anywhere between 6 and 18 months.

CHILD PROTECTION STANDARDS		
	Essential	Comprehensive
1. Child protection policy and procedures, including a code of conduct	The organisation has a child protection policy/ statement or other documented policies and procedures which meet the expectations of DFAT's Child Protection Policy. The organisation has a Code of Conduct that is consistent with the DFAT Child Protection Code of Conduct. All personnel are required to acknowledge they have read and agreed to the organisation's Code of Conduct. Downstream partners are encouraged to develop their own policies, procedures and codes specific to child protection, but may adopt the policies of their upstream partner if appropriate.	The organisation has a detailed child protection policy and procedures in place which meet the expectations of DFAT's Child Protection Policy and are subject to regular review. The policy should demonstrate the organisation's commitment to zero tolerance for child exploitation, abuse and harm and establish procedures in line with these standards. The organisation has its own Code of Conduct that is consistent with the DFAT Child Protection Code of Conduct. All personnel are required to acknowledge they have read and agreed to the organisation's Code of Conduct. Downstream partners are encouraged to develop their own policies, procedures and codes specific to Child Protection, but may adopt the policies of their upstream partner if appropriate.
2. Reporting mechanism and investigation procedures	The organisation can receive and manage incident reports safely and confidentially in accordance with Australian and/or local law. Reporting mechanisms are accessible to all stakeholders including children. The organisation must report incidents and investigation outcomes to DFAT.	The organisation has a well-publicised, accessible (including to children), confidential and safe mechanism for reporting child protection concerns or incidents which includes protections from retaliation. The organisation has documented procedures for managing child protection incidents that include trauma-informed responses, procedural fairness, transparent and timely investigation processes, privacy protections and support for child victim-survivors, and appropriate disciplinary actions if the incident involves their personnel. The organisation ensures children, families and communities are informed about expected behaviours, reporting mechanisms and investigation processes in accessible and culturally appropriate ways. The organisation must report incidents and investigation outcomes to DFAT.
3. Risk management processes	The organisation undertakes a child protection risk assessment, including mitigation actions tailored to the activities and the context, that is reviewed at least annually and revised as needed.	The organisation undertakes a child protection risk assessment, including mitigation actions tailored to the activities and the context, that is reviewed at least annually and revised as needed. The organisation must provide documented evidence that senior management and executive boards have visibility of child protection risk management. The organisation has documented evidence of its expectations for downstream partners and how those partners will manage child protection risk.
4. Child protection training	The organisation provides basic child protection training to all relevant personnel. Personnel are required to complete the training annually.	The organisation provides comprehensive child protection training – regularly reviewed for all personnel. Personnel are required to complete the training annually.
5. Child safe recruitment and screening processes	The organisation conducts child safe recruitment and integrity screening for all personnel. Screening should include reference checks, recent police checks, working with children or vulnerable people checks, or locally appropriate alternatives, or where these are not feasible, a self-declaration.	The organisation conducts child safe recruitment and integrity screening for all personnel. Screening should include reference checks, recent police checks, working with children or working with vulnerable people checks, or locally appropriate alternatives. Additional integrity measures required include targeted messaging and questioning about child safeguarding at all stages of recruitment and onboarding, and ongoing monitoring of staff behaviour and adherence to child protection policies and processes.

