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| Child Safety Policy | | |
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1. Purpose

This policy confirms Mercy Ships zero tolerance of sexual exploitation, abuse, and harassment, including zero tolerance of a lack of action to establish a safeguarding environment and to respond to safeguarding concerns. Act for Peace will continue to strengthen our commitment to the prevention of sexual exploitation, abuse, and harassment by ensuring all members of staff understand their responsibilities in maintaining an environment which prioritises safeguarding, addressing inequity in power, and prioritising the safety and wellbeing of survivor/victims.

Mercy Ships will continue to strengthen our safeguarding through reflection on both theory and practice and through participation in activities that strengthen the broader safeguarding environment. This policy is maintained through our culture, actions, procedures, agreements, reporting and adherence to relevant laws, policies, principles, and standards.

2. Scope

This policy applies to all members of Mercy Ships Australia the non-profit religious organisation registered in the state of Queensland; engaged either full-time or part-time, whether as employees, volunteers, in-country project teams and visitors to projects (hereafter referred to as 'personnel').

Parts of this policy also apply to any other person staying overnight at any Mercy Ships property or on board any ship operated by Mercy Ships, specifically, Sections 3.1, 3.2, 3.5 and 3.6.

This policy is managed by the Child Safety Office of Mercy Ships Australia, approved by the Managing Director of Mercy Ships Australia, and reviewed by the Board of Directors of Mercy Ships Australia with oversight by the Board of Directors of Mercy Ships Australia.

This policy addresses definitions of harm, including abuse; a code of conduct for adult interactions with children; screening of applicants; training of adults and children in child safety; childcare guidelines; response procedures; member care including counselling; and administrative actions.

When this policy is changed, all active personnel are notified. This policy is available to all personnel through the Child Safety pages on Navigator, the intranet of Mercy Ships.

This policy is consistent with the [Elements of a Child Safety Program](#) adopted by the Child Safety & Protection Network.

3. Policy Statement

3.1. General Principles

As an organisation and as individuals, we take our responsibility to protect children seriously. We believe it is never acceptable for any child to experience harm. Protecting the children for whom we are responsible is the shared responsibility of every adult within our organisation. We believe that by working together we can create a safe environment for both children and adults, while carrying out the mission of the organisation.

We are committed to:

- Ensuring the safety of children and young people in locations and facilities where we are responsible to care for them;
- Striving for excellence in the care and nurture of the children and young people for whom we are responsible;
- Encouraging and supporting parents and families;

- Ensuring that all personnel are given support and training about child safety;
- Clearly understanding and regularly communicating procedures for dealing with concerns about child safety;
- Preserving as best we can the dignity and reputation of each person affected by concerns about child safety, by adhering to defined procedures for maintaining the confidentiality of personal and private information which may be disclosed;
- Providing a safe environment for children and young people from harm in locations where we conduct our work;
- Complying with legal requirements in reporting.

3.1.1. Care Of Children

Mercy Ships does not tolerate the abuse or neglect of children in the care of the organisation, and it responds to all reports of concern for child safety, whether about a current incident or a historic one.

3.1.2. Child Safety Code Of Conduct

Mercy Ships has established a Child Safety Code of Conduct which includes specific items concerning child safety. All personnel are responsible for reading and signing this Code of Conduct, stating they understand it and this policy and that they agree to comply with both.

Any member of personnel who breaches this Code of Conduct is subject to disciplinary procedures, including those detailed in this policy.

3.1.3. Responsibilities For Carrying Out This Policy

3.1.3.1. Child Safety Office: Child Safety Manager

The Child Safety Office, headed by the Child Safety Manager, is responsible to monitor compliance with this policy and its related procedures; to manage the response to any report of concern for child safety in accordance with defined procedures; and to assist the following departments in carrying out their defined responsibilities for child safety.

The Child Safety Manager is responsible to receive reports of concern for child safety, to manage any internal inquiries warranted by the application of this policy, and to ensure the administrative actions defined by this policy and its related procedures are carried out.

At each operating location, the adjunct role of Child Safety Officer is assigned by the Child Safety Manager in consultation with the location's senior leader, to a specific individual, for example, the location Human Resources Director. The location Child Safety Officer receives reports of concern for child safety at that location, communicates directly with the Child Safety Manager about matters of child safety, and will normally manage the local response to any reported concern for child safety. In the absence of a designated Child Safety Officer at any operating location, that location's senior leader, such as the Managing Director of a ship or a Country Director of a host nation serves in that capacity.

3.1.3.2. Human Resources Department: Chief People Officer

The Human Resources Department, headed by the Chief People Officer, and represented at each operating location by the local Human Resources Director, is responsible for the management of the screening process for all applicants and to manage the training program for child safety for all personnel.

The Human Resources Department administers any required background checks, interviews, and reference checks, and maintains the records of these screening activities in a controlled fashion, in accordance with defined procedures.

The Human Resources Department ensures that all personnel are informed of this Child Safety Policy and the Child Safety Code of Conduct.

3.1.3.3. Chaplains Department: International Spiritual Development Officer

The Chaplains Department, headed by the International Spiritual Development Officer, is responsible to manage appropriate member care for any individuals who may be affected by child safety concerns under this policy.

3.1.3.4. Executive Leadership: Chief Executive Officer And Managing Directors

The Chief Executive Officer of Mercy Ships is responsible to ensure that the resources of the organisation are effectively employed in maintaining the child safety program, including the capacity to respond promptly to any reported concerns and to provide appropriate care to any affected individuals.

The Managing Director or senior leader of each operating location is responsible to enforce this policy, to ensure the available resources of the organisation are effectively employed in maintaining a safe environment for children, to understand any local legal requirements for child safety, and in case of a report of concern for child safety, to implement the Safety Plan agreed upon with the Child Safety Manager or the location's Child Safety Officer, as provided. In the absence of a designated Child Safety Officer for the operating location, the Managing Director or senior leader serves in that capacity, fulfilling those additional duties as described above in 3.1.3.1.

3.1.3.5. Boards Of Directors: Chairs Of The Boards

The Chairs of the Board of Mercy Ships and of Mercy Ships International are responsible to receive reports of any child safety concerns from the Child Safety Manager, and to ensure that their respective Boards are informed and satisfied that the response of the organisation to any such concerns is in conformance with this policy and any applicable legal requirements.

3.1.3.6. All Personnel

Each member of the personnel of Mercy Ships, as defined above in Scope, is responsible to report any concern about the safety of children in the prescribed manner; to participate fully in the organisation's training program for child safety, as determined by their assigned responsibilities; to participate fully in any internal inquiries if so requested; and to comply with this Policy and the Child Safety Code of Conduct at all times. Failure to comply with any of these requirements may result in disciplinary action, up to and including termination.

3.1.3.7. Parents Of Children

Parents have the primary responsibility for the safety, health and welfare of their own child or children. It is understood that a parent may delegate this responsibility to assigned child-care providers, managed by the organisation, for specific activities, in defined locations for defined periods of time. In addition, a parent may choose to delegate responsibility for the safety of their child or children to a child-care provider of their own choosing, outside of the direct control of the organisation, such as arranging a babysitter for their child, or entrusting their child to the care of another responsible adult of their own choosing.

3.1.4. Monitoring And Review Of The Child Safety Program

The child safety program is monitored and reviewed regularly to ensure its elements are functioning effectively. The Child Safety Manager coordinates these monitoring and review activities with the appropriate managers.

3.1.4.1. Monitoring Activities

Program monitoring occurs on a continuous basis. Mercy Ships maintains dedicated communication lines for any concerns or questions related to the safety of children, by telephone and by email. These lines are monitored by a trained child-safety watch-keeper who alerts the Child Safety Manager of any incoming messages. Screening of applicants is monitored by the managers of the departments receiving new members of personnel who will provide direct care to children, such as the Academy on board each ship. Administration of this child safety policy and the

code of conduct, and completion of required training in child safety, are monitored by Human Resources staffing managers and location Human Resources Directors. Managers of organised activities for children monitor those activities for risks of harm to children and actively reduce those risks to an acceptable level.

3.1.4.2. Review Activities

Program review includes the program documentation, including this policy, the Child Safety Code of Conduct and the Glossary of Child Safety Terms; the screening process for new members of personnel; the administration of the Child Safety Policy and Code of Conduct to all personnel; training of all personnel; provision of child care in organised activities; risk assessments for those organised activities; the status of the response to any reports of concern received over the review period; and any significant changes to the program.

The Child Safety Manager reports on the state of the program on a regular basis to General Counsel, Chief Executive Officer, and Board Chairs. The content of these reports may include but are not limited to the effectiveness of the child safety program; any recommendations for improvements from lessons learned through regular activities or the response to reported concerns; and any need for resources additional to those already allocated to the program.

3.2. Definition Of Child Safety Terms

Mercy Ships has defined certain terms related to child safety and protection. These definitions are available to all members of personnel in the Child Safety Glossary of Terms. These definitions guide the application of this policy and its related procedures within the organisation itself and in communications with other agencies. These definitions are based on recognised international standards.

The types of child maltreatment specifically addressed by this policy and its supporting documentation include:

1. Sexual abuse, by verbal, visual or physical means;
2. Physical Abuse
3. Emotional abuse
4. Neglect

In this policy, sexual harassment is understood as behaviour that is unwanted in the eyes of the persons directly or indirectly affected.

This includes, but is not limited to:

- Physical approaches or physical contact of a sexual nature, or sexual assault
- Gestures and other nonverbal communication with sexual undertones
- Comments of a sexual nature about individuals and/or their body, conduct, sex life or sexual identity
- Sexually discriminatory language and humiliating remarks, including sexually explicit jokes;
- Requests to perform sexual activities
- Showing or displaying pornographic or sexist images
- Repetitive questions or prying into an individual's relationship status or details of their relationship
- Invitations to inappropriate locations outside the workplace for work-related meetings
- Offers to, or the sending of gifts that are unwelcome, out of context or embarrassing to an individual
- suggestive logistics or questions around work trips, including offers to share hotel rooms and unwelcome social invitations
- Sexually motivated stalking

Child 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 (AVI Child Protection Policy).

Child Exploitation - one or more of the following:

- 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
- Using a minor for profit, labour, sexual gratification, or some other personal or financial advantage

Online Child Sexual Exploitation (or child pornography) - in accordance with the Optional Protocol to the Convention on the Rights of the Child, 'child pornography' means 'any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes.

3.3. Screening

Mercy Ships screens all personnel before accepting them for service within the organisation, according to the documented procedures of the Human Resources department.

The degree of screening varies according to the assigned responsibilities and operating location of the position under consideration, being more stringent for those individuals who will be directly responsible for the safety and welfare of children.

In case an individual is internally re-assigned to different duties than those for which they were originally accepted, or volunteers for additional responsibilities involving the safety and welfare of children, the Human Resources Director of the operating location to which the individual is being assigned ensures that the individual has been screened to the standard of their new assigned responsibilities before the individual assumes those responsibilities.

Mercy Ships will not knowingly accept anyone to serve in the organisation who has a prior conviction of committing child abuse, or against whom an unresolved allegation of child abuse has been made in the public record.

The screening procedures are documented and managed by the Human Resources department, as led by the Chief People Officer, and they incorporate: application review; self-disclosure questions; background checks; reference checks; and personal interviews.

3.3.1. Application Review

Any person who desires to work with Mercy Ships is required to complete an application according to a standard form maintained by the Human Resources Department. The information submitted by the applicant, along with any supporting documents, is reviewed by qualified personnel, according to the documented procedures of the Human Resources department.

3.3.1.1. Self-Disclosure Questions

Included in the application form are questions to the applicant requesting they disclose any past history of misconduct or an allegation of misconduct causing harm to a child. If an applicant responds affirmatively to these questions, their application is placed on hold while the facts of the matter are checked.

3.3.1.2. Employment History

The application form requests the employment history of the applicant. For those individuals applying to work with children, their employment history is reviewed with them during their personal interview, specifically to determine what, if any responsibility they had for children in previous jobs.

3.3.2. Background Checks

Mercy Ships requests from all applicants their permission for the organisation to conduct a background check. Those applicants who do not grant this permission are denied for service.

Mercy Ships checks for criminal records for those individuals who will be in direct contact with children or assigned responsibility for direct care of children, including but not limited to: those engaged as teachers in a ship Academy;

those who lead youth activities; and those who may be assigned to provide child care. These background checks are conducted according to the documented procedures of the Human Resources department.

3.3.3. Reference Checks

Mercy Ships requests personal references from all applicants. For those individuals who apply to work directly with children, their references are checked according to the documented procedures of the Human Resources department, which include asking each reference to describe the character and competence of the applicant, and to speak to any concerns regarding prior work with children. The responses of the references are recorded in the applicant's file and are reviewed before the applicant is accepted for service.

3.3.4. Personal Interviews

Mercy Ships conducts personal interviews of all individuals who apply to work directly with children, before accepting them for service with the organisation. The interview is conducted according to the documented procedures of the Human Resources department and includes standard and behavioural questions about the applicant's previous work with children. The results of the interview are recorded in the applicant's file and are reviewed before the applicant is accepted for service.

3.4. Training

Mercy Ships trains all members of personnel in child safety. The procedures and curricula are documented in the [Child Safety Training Program](#).

3.4.1. Training Of All Adult Personnel

3.4.1.1. Initial Training In Child Safety

Mercy Ships trains all adult personnel in child safety in order to raise the awareness of each member of the organisation about:

- The realities of child endangerment and abuse, including the definitions of abuse documented by Mercy Ships;
- The risk factors affecting the safety of children, including the risk of child-on-child maltreatment.
- The responsibilities defined by this policy, including the [Child Safety Code of Conduct](#);
- How to report concerns for child safety, including the importance of prompt reporting of low-level concerns;
- How the organisation responds to reports of concern for child safety.

All members must have a documented code of conduct or behaviour in place that covers the following with regard to child safeguarding

- Appropriate language.
- Appropriate communications.
- Banning of alcohol and drugs.
- Gifts to children.
- Physical contact with children.
- Banning of sexual relations with children.
- Child labour.
- Photos and images.
- Reporting responsibilities.

Participation in organised training activities is a requirement for service with the organisation, for all members of personnel, regardless of the length of service commitment. The specific training requirements vary depending on the nature of assigned responsibilities and the environment of the operating location.

All members of personnel are expected to complete their required training in a timely manner as defined in the Child Safety Training Program. Failure to do so may result in the application of disciplinary measures.

Mercy Ships recognises that the subject of child maltreatment and abuse is a sensitive one, and that it may evoke strong emotional or psychological responses in certain individuals, especially those who themselves may be survivors of abuse. Mercy Ships is committed to providing supportive member care in conjunction with training activities to any member of personnel who requests it.

Mercy Ships also recognises that cultural factors may affect how individuals perceive risk factors and unacceptable behaviours. To the extent possible, Mercy Ships will provide its members with information on cultural beliefs and perspectives that are unique to a particular operating location so that all personnel may know how to best keep children safe within that specific cultural context. However, this policy and its related definitions and procedures will govern the activities of Mercy Ships members, including reporting concerns for child safety and responding to those reports.

3.4.1.2. Periodic Refresher Training For All Adult Personnel

Mercy Ships requires periodic refresher training in child safety for all personnel whenever there is a significant change in this policy or its related definitions and procedures, or at a minimum of every three years. This refresher training includes an update on the reality of child abuse, a review of this policy and its related definitions and procedures with emphasis on any changes, acceptable standards of behaviour of all adults in their interaction with children and youth, and any additional resources for the improvement of a safe environment for children.

3.4.2. Additional Training For Families

Additional training is provided to families in service with the organisation, specifically for parents and for children as appropriate to defined age and/or school grade ranges.

3.4.3. Additional Training For Personnel Responsible For Providing Direct Care For Children

3.4.3.1. Initial Training

Additional training in child safety measures and response procedures is provided to those personnel with assigned responsibilities for providing direct care to children, including but not limited to the personnel of the following departments and functions: Academy; Learning and Development; Chaplains; and certain medical staff. This training includes but is not limited to knowledge about creating a safe environment for children and recognizing the warning signs of harm or maltreatment; and procedures for making an initial report of concern for child safety.

Personnel responsible for providing direct care for children complete their required training before working independently. Until their training is completed, they are assigned to work under the supervision of another member of personnel who has been fully screened and trained to provide such care.

3.4.3.2. Annual In-Service Training

Mercy Ships provides annual in-service training for personnel assigned responsibility to provide direct care for children. This annual in-service training includes but is not limited to a review of this policy with its related definitions and procedures, focusing on expected behaviour with children, safety measures, reporting procedures, and emergency protocols. It may also cover such topics as new tools and knowledge in the field of child safeguarding.

If a new staff or crew member who is assigned responsibility for providing direct care for children has completed the initial training specified in 3.4.1 and 3.4.3 within the previous six months of the scheduled annual in-service, they will not be required to attend the annual in-service, although they are welcome to do so. If they completed

their initial training more than six months prior to the scheduled annual in-service, then they are required to attend the annual in-service training as well.

3.4.4. Additional Training For Managers And Heads Of Departments

Additional training in child safety measures, response procedures, reporting instructions and corporate responsibilities is provided to those personnel assigned responsibility to manage the work of other members of personnel.

3.4.5. Additional Training For Child Safety Responders

Additional training in child safety response procedures is provided to those personnel who accept the responsibility of serving as child safety responders, including those who may be engaged to perform an internal inquiry, and those who may be engaged in providing member care.

3.4.6. Records Of Training

Records of child safety training completed by an individual are kept in that individual's personnel file. This information is available to managers within the organisation.

The Human Resources Director for the operating location at which the training is completed is responsible to record that training in the individual's file.

3.5. Providing Care For Children In Organised Activities

Mercy Ships provides organised activities for children of various ages, both the beneficiaries served through a variety of programs, and the dependent children of its own members of personnel.

3.5.1. Risk-Based Approach

Mercy Ships manages these activities to reduce the risk of harm to children with the following measures:

- Screening all personnel, with special added measures for those personnel assigned to provide direct care to children;
- Training all personnel in child safety to raise awareness of common risk factors to the safety of children;
- Providing special training for managers in making risk-based decisions when planning activities involving children;
- Conducting risk assessments for organised activities involving children;
- Adjusting the activity plans to reduce the risks of harm to children;
- Ensuring the activities are supervised by an adequate number of properly screened and trained adult personnel, and
- Complying with applicable local laws and regulations concerning the safety of children.

The procedure to assess and treat the risks of harm to children are documented in *Risk Management for Children's Activities*.

In addition to this procedure, the organisation provides its managers with the forms *Checklist for Risk Management of Children's Activity* and *Risk Management Plan*.

3.5.2. Child Care Guidelines For All Age Groups

Each Mercy Ships operating location that conducts regular organised activities involving children has written guidelines to govern such activities, to minimise the known risks to child safety, specifically through minimizing isolation, increasing accountability, and balancing power and control.

Members of personnel directly involved in these regular organised activities involving children are responsible to know and follow the guidelines which pertain to that particular activity.

These guidelines are maintained by the department responsible for the organised activity involving children, under the authority of the Managing Director or senior leader for the operating location, with copies available to all personnel.

3.5.3. Child-Safe Communications

Mercy Ships recognises the value in recording and communicating about important events in the life of a child and in the conduct of the mission of the organisation. It also recognises and requires each member of personnel to likewise recognize and consider carefully, the risks involved in making recordings of children, whether by video or photograph, in any form or media, especially when the form or media make possible the electronic communication of these images of children.

In view of these risks, when performing work for the organisation, members of personnel will not use their own personal cameras or mobile electronic devices to record audio, visual or audio-visual images of children. The permission of the parents or guardian of the child or children whose image is to be recorded will be obtained prior to making the recording. The child or children who are the subject of visual recordings will be clothed with a degree of modesty which is appropriate to their own culture.

All recorded images of children, in any format, are considered data objects as defined in the [Data Protection Policy](#) of Mercy Ships. In keeping with that policy, these images are protected against unauthorized access, transfer or use and are maintained in secure storage.

In keeping with the recognized responsibility of parents for their child or children, Mercy Ships respects the right of any parent to require that the organisation not make or make use of such images of their child or children. Parents may notify the organisation of this requirement by writing to their location Child Safety Officer or to the corporate Child Safety Manager. These individuals then notify in turn those departments providing care to those particular children, as well as the senior manager of the operating location where the family resides.

3.5.4. Working With Partner Organisations

In achieving its planned objectives, Mercy Ships may from time to time engage the assistance of other organisations to provide services to the beneficiaries or to the members of personnel of Mercy Ships. If such partner organisations will be working with children, who are either beneficiaries of the organisation or dependents of Mercy Ships personnel, then Mercy Ships will ensure that there is clear agreement with the partner organisation about how each organisation will support the other in meeting the requirements of the child safety program of Mercy Ships.

Mercy Ships may request of any partner organisation written evidence to this effect, for example by reviewing the documented child safety policy of the partner organisation, or other evidence that the partner organisation meets a recognized standard of child safety or child safeguarding which is acceptable to Mercy Ships.

Any members of the personnel of a partner organisation that work directly for Mercy Ships will be required by Mercy Ships to complete the administrative and training requirements of this Mercy Ships child safety policy, in accordance with their assigned duties.

Mercy Ships will require of the partner organisation the name and contact details of the individual in the partner organisation who is to be contacted if a report of concern for child safety is received which identifies any member of the personnel of the partner organisation as being possibly involved with or knowledgeable about the matter of concern.

The Mercy Ships manager responsible for the partner organisation engagement is responsible to complete the child safety program requirements described in this section, and to send copies of the documented evidence of such compliance to the Mercy Ships Child Safety Office.

3.6. Reporting And Response Procedures

3.6.1. Reporting Concerns For The Safety Of A Child Or Children

Any member of personnel who observes behaviour which causes them concern for the safety of a child or children is responsible to report the facts of the observed behaviour to the Child Safety Office. The controlled form Initial Report of Concern for Child Safety is provided for this purpose. Reports may also be made via dedicated email and telephone lines, or in person to the location Child Safety Officer or to any manager, in accordance with the Instruction for Reporting a Concern for Child Safety.

Mercy Ships recognises that preventing harm to children requires heightened vigilance on the part of all personnel, in order to promote the types of behaviours by both adults and children that will provide the safest possible environment for children. Members of personnel are encouraged to report even low levels of concern, such as situations involving increased risks of harm to children through increased isolation, lack of accountability or an imbalance of power, even though no discernible harm may have been caused. Reports of low-level concerns form an important part of the child safety program, as they provide the opportunity to review the behaviours in light of the operational circumstances, to improve the understanding of all members of how to create a safer environment for children, and to demonstrate the practical exercise of this policy and its related definitions and procedures.

Mercy Ships accepts anonymous reports of concern for child safety, while recognizing that such reports are more difficult to verify and follow up than reports provided by an identified person. In case the reporter is fearful or evidently traumatized, the organisation provides support and care to the reporter to ensure their safety and well-being. The identity of the person reporting a concern for child safety will be maintained in confidence, as described in Section 3.6.3.3, Confidentiality of Reports and Related Documents.

3.6.2. Response To Reports Of Concern For Child Safety

Mercy Ships responds to all reports of concern for child safety, whether current or historical, concerning one of its members of personnel involved with any child, or involving a child of one of its members of personnel with any other person, adult or child, by following the procedures defined in CS Procedure - Response to Report of Concern for Child Safety.

Mercy Ships bears the cost of these response efforts, in accordance with applicable financial regulations and company financial policies and procedures.

Mercy Ships may seek legal counsel at any stage in the response process: to request advice on particular points, such as legal jurisdictions and required reporting to external authorities; for assistance in conducting the internal inquiry; or for direction of the response process.

3.6.2.1. Objectives Of Response

The objectives of this response are to:

- Provide appropriate care to any individuals who might be harmed or who have been harmed by the incident or incidents;
- Satisfy any legal obligations of the organisation to report to external authorities;
- Apply appropriate discipline to any member of personnel found to have breached this policy, its related procedures or the Child Safety Code of Conduct;
- Identify any areas where the organisation might improve its practices in order to strengthen its child safety program.

3.6.2.2. Phases Of Response

The response of the organisation to a report of concern for child safety will include at least two and up to four of the following phases:

- Initial Assessment (in every case): In which the Initial Report is received by the Child Safety Office, its contents are verified, any necessary safety plan is implemented, and any required reports to external authorities are made;
- Child Safety Assessment (in cases where children are at risk of harm): In which trained responders conduct an inquiry to gather the available facts and assess the risks of harm to the child or children identified in the Initial Report;
- Misconduct Assessment (in cases where adults are involved): In which trained responders conduct an inquiry to gather the available facts and determine if this policy, its related procedures or the Child Safety Code of Conduct have been breached, and if so, by whom and to what extent;
- Conclusion (in every case): In which the outcomes of the response are determined, one or more Action Plans are initiated and any appeal by the respondent(s) is made.

Each of these response phases is described in more detail in the documented procedure Response to Report of Concern for Child Safety.

3.6.2.3. Safety Plans

Mercy Ships maintains the highest priority for the safety of children throughout its response process. Of primary importance upon receipt of the initial report of a concern for child safety is the determination that the children involved are safe, that is, in a safe place and under the care of responsible persons who can provide for their basic needs.

If the safety of a child or children is in doubt or is known to be at risk, steps are taken immediately to correct the situation and provide for the protection and welfare of the child or children. In certain cases, this may include the temporary separation of the child or children from one or both parents or from siblings or other family members. In all cases where the safety of a child or children is considered to be at risk, the respondent is placed on administrative leave which includes at a minimum the suspension of any responsibilities for providing direct care for children.

These corrective steps are jointly known as the Safety Plan for the particular incident. The Child Safety Manager works with the location Child Safety Officer and the Managing Director or senior leader of the operating location where the concern is reported to implement this Plan.

3.6.2.4. Reporting To External Legal Authorities

In those cases where external legal jurisdiction for matters of child safety is known to exist, such as in the State of Queensland, the legal authorities for child safety are notified by the organisation of the facts available at the time of the report being made to those authorities. If those authorities decide to investigate the case themselves, then Mercy Ships subordinates its own response to the requirements of that external legal investigation.

A record of this report to external legal authorities is kept by the Child Safety Office.

3.6.2.5. Internal Inquiry By Trained Responders (As Needed)

For each report which warrants an inquiry, a team of trained responders (the Inquiry Team) is formed and works according to the documented procedures for child safety response. Each team consists of at least two responders. Additional team members may be added to assist with specific skills, such as language translation. However, the number of members of each Inquiry Team will be kept as small as practical, in order to maintain the highest possible level of confidentiality of information.

In those cases where the Initial Assessment indicates that the reported behaviour might meet the definition of child abuse, the Inquiry Team includes an external member, trained to the standards of the Child Safety and Protection Network (CSPN) or an equivalent standard as determined by the Child Safety Manager. This external team member may serve on site with the Inquiry Team, or remotely as a reviewer of the team's outputs, including interview transcriptions and draft findings.

3.6.2.6. Determination Of Outcomes

In concluding the response of the organisation to a report of concern for child safety, the Child Safety Manager reviews the available evidence and, in consultation with appropriate senior leaders, determines the outcomes based on a preponderance of the evidence according to the following scale, with reference to the published policies of Mercy Ships with their supporting documents:

- The behaviour meets the definition of (sexual abuse / physical abuse / emotional abuse / neglect) of a child by (an adult/another child).
- The behaviour meets the definition of inappropriate behaviour between a child and (an adult / another child).
- The behaviour meets the definition of behaviour which breaches the Child Safety Code of conduct.
- The behaviour meets one or more definitions those behaviours which increase the risk of harm to children.
- The behaviour does not meet any definitions of behaviour defined in the published policies of Mercy Ships with their supporting documents.
- The evidence is inconclusive in terms of the behaviours defined by Mercy Ships in its published policies and their supporting documents.

3.6.2.7. Action Plans

In consultation with the appropriate senior leaders based on the circumstances of the reported concern, the Child Safety Manager defines one or more Action Plans to address:

- Member care for the children, their families and any adults affected by the reported concern, including the respondent and the respondent's family. To the degree possible in the circumstances, this plan will take into account such factors as age, age difference between respondent and child, seriousness of the offense(s), acknowledgement of responsibility and cultural norms;
- Specific administrative actions to be taken against individual members of personnel, including those prescribed for specific defined outcomes in Section 3.8, Administrative Actions;
- Any improvements which might be made to the Child Safety Program or the related business practices of the organisation in order to reduce the possibility of a similar incident or incidents occurring again, to reduce the risk of harm to children, and to improve the effectiveness and efficiency of the Program.

3.6.2.8. Appeal Process

Mercy Ships provides an appeal process for any party affected by a report of concern for child safety and/or the organisation's response to that report, including the respondent. This appeal process is managed by the Human Resources department, as represented by the Human Resources Director responsible for the operating location where the individual making the appeal is assigned. Access to information for the purpose of considering the appeal is governed by the organisation's policies on confidentiality.

This right to appeal does not include or imply any right or permission for the respondent to confront, question or otherwise meet the affected child or children or their family members or the reporter of the concern.

3.6.3. Principles Of Effective Response

The following principles guide the response of Mercy Ships to reports of concern for child safety:

3.6.3.1. Consistency In Response Procedures And Application Of Policy

Each report of concern for child safety is dealt with promptly according to the documented procedure Response to Report of Concern for Child Safety. Inquiry teams follow documented protocols. These teams comprise persons who have been specially trained for that purpose.

3.6.3.2. Unbiased Approach During Response

When responding to a report of concern for child safety the organisation maintains an unbiased approach to the parties involved, until the final outcomes have been determined. This does not preclude the organisation from placing certain individuals on administrative leave during the response, or requesting that certain individuals, possibly to include entire families, move to a different location during the response. Member care is made available to all parties involved in an incident of concern for child safety to the degree possible with the available resources.

3.6.3.3. Confidentiality Of Reports And Related Documents

The information in each report of concern for child safety and from the response process which follows is kept in confidence, to the extent possible, which means that access to that information is restricted to those who need to know that information for the performance of their duties under this or related policies and procedures. This includes the identity of the person making the report.

The records of all reports, fact-finding work, and determination of outcomes, regardless of the conclusion reached, are controlled by the Child Safety Office in accordance with the policies of Mercy Ships.

The personnel records of individuals involved in any reported cases of child maltreatment are maintained by the Human Resources department.

Records of member care provided to individuals affected by child safety concerns are maintained by the Chaplains department.

3.7. Member Care

Mercy Ships provides care to any of its members of personnel, present and past, affected by child maltreatment which has been determined to have occurred within the management control of the organisation, as needs are assessed.

This member care may include but is not limited to educational resources, mentoring, retreats, counselling and medical care. Counselling may include the assignment of qualified counsellors on staff with Mercy Ships, or contracting with private, professional licensed counsellors as necessary and available. Any such specialized services are planned in collaboration with the individual receiving the care.

The International Spiritual Development Officer coordinates the provision and type of member care with the affected individual in accordance with the documented procedure [Follow Up Member Care](#).

Mercy Ships provides care to members of personnel who serve as part of a response team in the case of a report of concern for child safety and makes care available to any member of personnel who may request it during and after child safety training.

3.8. Administrative Actions

3.8.1. Communicating Internally And Externally

The Child Safety Manager ensures that the Chair of the Board of Mercy Ships International, the Chair of the Board of Mercy Ships, the Chief Executive Officer of Mercy Ships and General Counsel of Mercy Ships are informed upon the initial receipt of a report of concern for child safety, and at subsequent stages of the response process described above.

The Chief Executive Officer of Mercy Ships coordinates the relevant notices to the affected community or communities, in consultation with the Managing Director or senior leader of the operating locations, the Child Safety Manager and the International Spiritual Development Officer.

The Child Safety Manager ensures that a proper report is made to the appropriate civil authorities, according to the published requirements of the relevant legal jurisdiction. In those cases where the organisation reports directly to the appropriate civil authorities, a record of each such report is kept, regardless of the response of the legal authorities to the report.

3.8.2. Disciplinary Actions

If the outcomes determined in the conclusion of the response include a breach of this policy, its related procedures, or the Child Safety Code of Conduct, then the organisation takes appropriate disciplinary actions against the individuals found to have breached them.

The following specific actions shall be taken for the specific outcome identified:

3.8.2.1. Sexual Abuse Of A Child By An Adult

Any current Mercy Ships member of personnel whose behaviour meets the organisation's definition of sexual abuse of a child will have their relationship with Mercy Ships terminated immediately. There will be no later opportunity to serve as a member of personnel, or to accompany another member of personnel for an assignment, or to be on Mercy Ships properties. Appropriate notations are made in that individual's personnel record to reflect this status as "Do Not Rehire".

In cases where abuse is determined after a member of personnel has resigned or retired from the organisation, an appropriate notation is made in that individual's personnel record and their status is amended to "Do Not Rehire".

3.8.2.2. Sexual Abuse Of A Child By Another Child

Any child whose behaviour meets the organisation's definition of sexual abuse of another child will be evaluated on a case-by-case basis, considering such factors as age, seriousness of the offense, acknowledgement of responsibility and effective treatment.

Any member of personnel whose child has been determined to have behaved in a manner which meets the organisation's definition of sexual abuse or of inappropriate sexual behaviour with another child will be asked to follow through with the relevant parts of the Action Plan created during the response process. Failure of the member to do so will lead to termination of their relationship with Mercy Ships. Reapplication for service will be evaluated on a case-by-case basis, subject to the terms of the Action Plan being met.

3.8.2.3. Physical Or Emotional Abuse Or Neglect Of A Child

Any current Mercy Ships member of personnel whose behaviour is determined to meet the organisation's definition of physical or emotional abuse or neglect of a child will be subject to disciplinary actions, up to or including the termination of their relationship with Mercy Ships. The actions taken will depend on the circumstances of the incident or incidents and will be determined by the Chief Executive Officer of Mercy Ships in consultation with the Child Safety Manager and the Chief People Officer. If the relationship is terminated, that person may later reapply to the organisation for service, provided any conditions imposed at the time of termination have been met.

3.8.2.4. Action Plan For Adults Whose Child Has Suffered Harm

The Action Plan created in the response process may identify certain actions to be required of an adult member of personnel whose child has been determined to have suffered harm from abuse or inappropriate behaviour. Failure of the member to follow the requirements of the Action Plan may lead to termination of their relationship with Mercy Ships. Reapplication will be evaluated on a case-by-case basis, subject to the terms of the Action Plan being met.

3.8.3. Release Of Information Following Termination

If Mercy Ships is asked by another organisation to provide a reference for a member of personnel who has been terminated under this policy for behaviour meeting the definitions of child abuse, or for a former member of personnel whose behaviour during their service with the organisation has been determined retroactively to meet

the definitions of child abuse, then Mercy Ships will disclose the reasons for the termination or the "Do Not Rehire" status to the inquiring organisation, to the extent allowed by law.

Other than specified above, information about a member of personnel whose employment has been terminated is managed in accordance with the documented policies and procedures of the Human Resources department.

4. References (Internal Access Only via Intranet)

Elements of a Child Safety Program, Child Safety and Protection Network, April 2016

Child Safety Code of Conduct

Child Safety Glossary of Terms

Human Resources Screening Procedures

Child Safety Training Program

Procedure: Risk Management for Children's Activities

Form: Checklist for Risk Management of Children's Activity

Form: Child Safety Risk Management Plan

List of Child Care Guidelines

Instruction: Reporting a Concern for Child Safety

Form: Initial Report of Concern for Child Safety

Procedure: Response to Report of Concern for Child Safety

Procedure: Follow Up Member Care