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1 PURPOSE

The Fred Hollows Foundation NZ Group (FHFNZ Group) recognises that violence against children and youth is prevalent throughout the world and in all societies. Violence against children takes many forms, including physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment, exploitation, and sexual abuse. Furthermore, children and youth may be vulnerable and at risk due to reasons of gender, sexual orientation, ethnic, cultural, or religious identity, disability, age, or illness.

The FHFNZ Group is committed to ensuring that its activities are implemented in a safe environment that prevents harm and avoids negative impacts on the health and wellbeing of children, especially those from vulnerable and marginalised groups. The Foundation will ensure that safeguarding processes and procedures are strengthened in our areas of



operation and that any concerns regarding children's or youth's safety are responded to actively, effectively, and confidentially.

The Foundation recognises the importance of appropriate professional conduct in protecting people. This Policy lays out the guiding principles and commitments of The Foundation and informs workers, representatives, partners, associates, and visitors of their responsibilities in relation to Safeguarding.

2 SCOPE

- a) This Policy applies to all FHFNZ Group employees and those associated with the delivery of The FHFNZ Group's work, both during and outside normal work hours, and also applies to partners, representatives, supported students, visitors, and anyone else associated with the FHFNZ Group's activities.
- b) This Policy should be read in conjunction with the Code of Conduct; External Complaints Policy; Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH) Policy; Risk Management Policy; and Content Gathering and Use Policy.

3 DEFINITIONS

Safeguarding children and youth is the responsibility, as well as preventative, responsive, and referral measures that are undertaken by the FHFNZ Group to protect children and youth, ensuring that no child or youth is subject to any form of harm as a result of their association with the FHFNZ Group.

Safeguarding measures include ensuring that a child or youth's contact with the FHFNZ Group, the people associated with us, and their participation in FHFNZ Group activities and operations, is safe - and where there are concerns over a child or youth's welfare or where a child or youth has been subject to harm, appropriate and timely actions are taken to address safeguarding issues.

Harm is any detrimental effect on a child's or youth's physical, psychological, or emotional wellbeing. Harm may be caused by abuse or exploitation whether intended or unintended.

A Child The United Nations Convention on the Rights of the Child defines a child as any person – girl, boy, young woman, young man, and children of other gender identities - under the age of 18 years (UNCRC Article 1)



A Youth	The United Nations includes young women, young men, and youths of other gender identities - aged 15 years to 24 years old. The United Nations regards youth as having safeguarding needs and requiring distinct consideration aside from younger children and older adults.
FHFNZ Group	Includes The Fred Hollows Foundation NZ (FHFNZ), its subsidiary The Fred Hollows Foundation NZ Pacific Eye Institute Limited (FHFNZ-PEI), and its controlled entities The Fred Hollows Foundation PNG Inc. (FHF-PNG) and The Fred Hollows Foundation NZ SI Trust Board (Incorporated) (FHFNZ-SI).
Partner	People or entities that the FHFNZ Group conducts significant business with, including but not limited to programme partners.
Representative	Any person (excluding workers) representing the FHFNZ Group, including but not limited to ambassadors.
Worker	Any individual who carries out work in any capacity for the FHFNZ Group in any jurisdiction including employers; employees; trustees; contractors; people with responsibility for work and workplaces; volunteers doing work activity; people receiving work experience; people receiving on-the-job training; people working from home and mobile workers.
Associates	Refers to a range of contracted paid and non-paid individuals who have committed to work with or support The FHFNZ Group. It includes, among others, board members, volunteers, interns, researchers, donors, consultants, contractors, staff and/or representatives of partner organisations (when operating in partnership agreement with The FHFNZ Group).
Visitors	Refers to people who are visiting our offices or programmes and may come into contact with children and youth through The FHFNZ Group, including journalists, media, researchers, visiting donors, and celebrities.

4 GUIDING PRINCIPLES

This policy is underpinned by the following set of principles that guide its implementation:

- (1) All children and youth aged under 18 years have equal Rights to protection from all forms of violence as declared in Article 19 of the United Nations Convention on the Rights of the Child.



- (2) The Universal Declaration of Human Rights recognises that youth, aged 18-24, have safeguarding needs that require distinct consideration aside from younger children and older adults.
- (3) The Human Rights of children and youth will be respected and applied to all irrespective of age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, any history of conflict with the law or any other aspect of their background or identity.
- (4) Inequality, exclusion, and discrimination of children and youth will be challenged and will not be tolerated.
- (5) All children and youth should be empowered and encouraged to fulfill their potential. Decisions made about children and youth will be made as far as possible with their participation and in their best interest giving full consideration to how such decisions will affect them.
- (6) Children and youth must be cared for and protected from harm, especially those that are vulnerable, marginalized, or at risk.

5 COMMITMENTS UNDER THIS POLICY

- (1) The FHFNZ Group is responsible for children and youth with whom we come into contact. No child or youth should suffer harm, intentionally or unintentionally, because of their engagement, association, or contact with us.
- (2) The FHFNZ Group will be open and transparent and will be accountable to our commitment to safeguard children and youth. Safeguarding concerns can be raised and discussed, poor practice and inappropriate behaviour challenged and addressed, and our safeguarding measures continuously reviewed and strengthened.
- (3) The FHFNZ Group will act on safeguarding concerns, ensuring that our actions are timely, appropriate, and centered around the child or youth, considering their specific needs and vulnerabilities.



- (4) The FHFNZ Group works in partnership with other agencies and with communities to promote the safeguarding of children and youth.
- (5) The FHFNZ Group safeguarding approach will respond to the specific safeguarding risks and needs of the different genders and other identities. The FHFNZ Group will take appropriate measures to address gender bias and other forms of discrimination and violence.
- (6) The FHFNZ Group will ensure our workers, partners, and representatives are supported to meet their safeguarding responsibilities and requirements, understand the risks to children and youth of different gender and other identities, and how they can work and engage in ways that increase the safety and protection of children and youth.
- (7) When investigating safeguarding reports, The FHFNZ Group will maintain procedural fairness and follow organisational protocols, and where innocence is established all efforts will be made to protect the confidentiality and reputation of the individuals involved.
- (8) The FHFNZ Group understands that norms regarding child protection vary globally, resulting in SEAH issues being accepted, tolerated, or ignored. As such, The FHFNZ Group commits to providing sensitive and contextually appropriate PSEAH training to ensure that the concepts, protocols, and policy are fully understood and that any breach cannot be tolerated.
- (9) The FHFNZ Group recognises the laws and protocols within our countries of operation and will use this Policy in conjunction with relevant employment/labour laws, duty of care, and relevant criminal laws to make decisions about how to respond to any concerns or reports raised.

6 BREACHES OF THE SAFEGUARDING POLICY

Breaches of The FHFNZ Group's Child and Youth Safeguarding Policy will not be tolerated and may result in disciplinary procedures, up to and including termination. Information about the process of investigations and outcomes is detailed in the Child and Youth Safeguarding Procedure document.



The FHFNZ Group will take action against anyone, whether they are the subject of a report or not, who engages in retaliatory action (such as - but not limited to - harassment, intimidation, or victimisation) against people who make a report, survivors, or other witnesses.

If a worker of The FHFNZ Group is found to have made an allegation that they knew to be false, they will be subject to disciplinary action, up to and including termination of employment. Partners, Associates, or Representatives of The FHFNZ Group will be subject to action that may result in the termination of their relationship with The FHFNZ Group.

7 REPORTING

The FHFNZ Group will maintain a male and female Safeguarding Focal Point in each country of operation (PNG, Fiji, Solomon Islands). These individuals will be tasked with providing regular information and supporting training on the PSEAH policy and procedures. They will also be the first point of contact for receiving reports.

The FHFNZ Safeguarding Officer will support the operationalisation of the policy across The FHFNZ Group. For example, the FHFNZ Safeguarding Officer will provide the Safeguarding Focal Points with information, training, and resources to promote PSEAH in-country. The Safeguarding Officer and Focal Points will also work with other staff to ensure the effective socialisation of this policy and support reporting, investigation, and response concerning all cases of PSEAH.

FHFNZ workers, partners, and representatives have a responsibility to report any suspicions or concerns regarding SEAH.

Any individual can raise a concern/ or make a report to The FHFNZ Group about an incident they have experienced, witnessed, or heard about concerning workers, partners, representatives, associates, or visitors of The FHFNZ Group without fear of retribution.

The Safeguarding Focal Points will take reports forward, in liaison with the Safeguarding Officer, and in line with The FHFNZ Group's Safeguarding procedures. Reporting will be treated sensitively, be considerate of local contexts, and opportunities will be made available to report verbally, in person, and in local languages.



8 REPORTING CHANNELS

Anyone can raise a safeguarding concern or make a report to The FHFNZ Group about something they have experienced or witnessed without fear of retribution.

Reports can be made verbally or in writing to:

- FHFNZ People, Culture, and Capability Manager: name and contact details
- Safeguarding focal points (1 Female/ 1 Male in each location)
 - Fiji: name and contact details
 - PNG: name and contact details
 - Solomon Islands: name and contact details
- Or to their line manager or other senior management staff.

As soon as possible after an incident has been identified the issue should be reported to the CEO.

All reports will be anonymised and placed in the FHFNZ Risk Register for consideration by the FHFNZ Group Risk Management Committee, and for quarterly Board reporting.

9 CONFIDENTIALITY

The identity of those reporting will be protected. Every effort will be made to maintain confidentiality throughout the reporting/ investigation process. Information that identifies individuals involved in a report will be limited to personnel with the absolute need to have such information and will not be shared further without obtaining the informed consent of the survivor, except if someone's life is at risk, a child or youth is at risk, or as required by law in consultation with legal counsel and where safe to do so.

Non-identifying information will be shared as per donor and regulatory body reporting requirements.

Staff involved in the report/ investigation process will be made aware of the importance of maintaining confidentiality. Employees who breach confidentiality may be subject to disciplinary action up to and including termination of employment, and others who work with The FHFNZ Group may have their relationship with The FHFNZ Group terminated. In some cases, such breaches may constitute breaking the law and The FHFNZ Group will be legally required to alert the relevant authorities.



10 REPORTS ABOUT THE FHFNZ GROUP PARTNERS

Where The FHFNZ Group receives a report about a partner organisation, The FHFNZ Group will expect the partner to respond safely, quickly, and appropriately, as detailed in all partnership agreements.

The FHFNZ Group will assist the partner to implement its reporting obligations. Where appropriate, The FHFNZ Group will work with the partner to address the issue through an appropriate independent investigation. If the outcome is that harm to a child or youth has occurred, ongoing work with the partner cannot involve the individual(s) concerned. If there is reason to believe that an allegation of harm has been dealt with inappropriately by a partner, then they risk the termination of the partnership.

11 REPORTS ABOUT EXTERNAL ORGANISATIONS

Safeguarding reports raised to the FHFNZ Group about other organisations will be referred to The FHFNZ Group Safeguarding Officer who will report cases to the relevant organisations involved where safe to do so.

Any referrals will consider circumstances that could indicate a potential risk of harm to an individual or others in the future. Reports should be referred to local protection working groups, networks, and/or the charity commission/police/donors where appropriate and safe to do so and/or in circumstances that could indicate a potential risk of harm to an individual or others in the future.

The FHFNZ Group will not investigate cases related to other organisations, but does have an obligation to report.

12 SUPPORT FOR INDIVIDUALS WHO SUFFER HARM

The FHFNZ Group will offer support to children or youth who have suffered harm because of their interactions with our organization. The FHFNZ will aim to provide support that is sensitive and appropriate to the individual's needs.



When available, appropriate, and in the best interest of the individual, The FHFNZ Group will work closely with local child protection authorities, parents, and caregivers in offering support to those who have suffered harm because of their interactions with The FHFNZ Group.

13 ACCOUNTABILITIES AND RESPONSIBILITIES

Creating a safe working environment is everyone's responsibility at The FHFNZ Group and failure to act on concerns or disclosures relating to harm towards a child or youth is not an option. Specific responsibilities for ensuring the implementation of this policy will be detailed in the procedure document.

All workers will:

- a) Agree, by signing, to say that they understand this policy and will comply with it
- b) Undergo a Police Clearance Check¹
- c) Participate in regular training sessions provided by The FHFNZ Group
- d) Report and respond to safeguarding concerns and breaches of the policy

All workers, partners, representatives, and associates will:

- a) Contribute to an environment where children and youth feel respected, supported, safe, and protected
- b) Never act or behave in a manner that results in a child or youth being harmed or places a child or youth at risk of violence
- c) Be aware of and adhere to the provisions of The FHFNZ Group's Child and Youth Safeguarding Policy (this policy)

All partners, representatives, and others associated who have direct contact with children on behalf of FHFNZ Group will either:

- Agree, by signing, to comply with The FHFNZ Group's Child and Youth Safeguarding Policy, or,
- Comply with its own organisational Code of Conduct, providing this complies with and is consistent with FHFNZ Group's Child and Youth Safeguarding Policy

Managers will ensure that:

¹ In some contexts, Police Clearance Checks are not effective. In this case, The FHFNZ will identify the most appropriate approach for completing background checks.



- b) Children, youth, and the communities where we work, or are in contact, can report any incidents occurring against children and youth, and the FHFNZ Group will take action when this happens.
- c) Workers, representatives, and partners are aware of the Safeguarding requirement that are applicable to their role or engagement with the FHFNZ Group, and that they are supported to maintain an environment that is safe for and prevents violence against children and youth
- d) Their teams receive regular training and updated information on the safeguarding policy, and procedures.

Safeguarding focal points for each FHFNZ Group country (PNG, Fiji, Solomon Islands, NZ) will ensure that:

- a) Workers and board members are provided with regular training sessions on child and youth safeguarding
- b) The Safeguarding Policy and Procedures are reviewed and strengthened regularly
- c) The Risk Management Committee, which includes the CEO, is kept informed with appropriate attention to confidentiality of any safeguarding concerns, reports, breaches of policy, or investigations.
- d) All reports will be handled in a way that maintains the protection, dignity, and confidentiality of the survivors
- e) The handling of reports adheres to our Child Safeguarding Policy and other relevant policies and procedures.

The CEO ensures that:

- a) This Policy is upheld and will immediately inform the Board of any significant concerns relating to safeguarding issues, that may present a risk to the FHFNZ Group, its workers, beneficiaries, representatives, partners, reputation, operations, or other activities.
- b) That reports or investigations are handled satisfactorily, on a timely basis, and that appropriate action has been implemented.
- c) The Risk Management Committee provides updates on safeguarding reports, investigations, or breaches, which occur across the FHFNZ Group, in their quarterly reporting to the Board.

The Board:



- a) Receives a quarterly update, included in the Risk Report, from The FHFNZ Group Management Team if there are any new or ongoing safeguarding reports or investigations.
- b) In certain circumstances, if the breach involves the CEO, the FHFNZ Board Chair may be required to oversee or investigate the safeguarding breach.

14 BREACH OF POLICY

- (1) A breach of this Policy may be assessed by the FHFNZ Group as constituting misconduct, serious misconduct, or fraud.
- (2) Depending upon the severity of the breach, the FHFNZ Group may invoke internal disciplinary action and, where considered appropriate in its discretion, action by an external enforcement agency.
- (3) In addition, the FHFNZ Group may seek the reimbursement of direct and indirect consequential losses or costs from the individual(s) concerned.
- (4) Workers who wish to raise a wrongdoing about another Worker's actions or behaviour in relation to this Policy, may do so under the FHFNZ Group Whistleblower Policy. Workers raising a wrongdoing will be protected from possible reprisals or victimisation if they have a reasonable belief that they have made the disclosure in good faith.

15 POLICY REVIEW

- (1) It is intended that this Policy will be reviewed at least every five years. This is not intended to constrain or limit the Board's ability to amend this Policy as it sees fit at any other time.

16 RELATED LEGISLATION AND DOCUMENTS

Code of Conduct

External Complaints Policy

Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH) Policy

Risk Management Policy

Content Gathering and Use Policy



Document control & amendment history

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1.1	Minor Amendments to align with standard policy clauses.	Chief Operating Officer	22.11.2022



ANNEX 1: POLICY DECLARATION

CHILD AND YOUTH SAFEGUARDING POLICY PERSONAL DECLARATION

I confirm that I have read and/or the policy has been explained to me, I understand the policy, and shall abide by **The FHFNZ Group Child and Youth Safeguarding Policy and Code of Conduct** for the entire period I am working or associated with, and or represent, The FHFNZ Group.

I understand that a violation of the Child and Youth Safeguarding or Code of Conduct can, depending on the degree of severity, result in immediate disciplinary action which can include dismissal.

Iagree to always comply with The FHFNZ Group Policy and Code of Conduct.

Signed:

Date: