

## Child and Adult Safeguarding Policy

<b>Policy Title</b>	Child and Adult Safeguarding Policy
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<b>Authorised By</b>	CEO
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### Revision/review history

Date	Explanation
June 16 2025	The following existing HFHA Policies were reviewed and merged into this single policy in line with HFHI's new policy, and considering DFAT, ACFID and other commitments. Child Protection CEO005, PSEAH CEO009, Child Labour IPP013, Child Protection & Mandatory Reporting (CHP) TEN021 and Child Volunteers Policy VOL007.
[Date policy reviewed]	[No updates made.]
[Date policy revised]	[Summary of revisions]

## Policy introduction

Habitat for Humanity Australia (HFHA) is a nonprofit, ecumenical Christian organisation dedicated to eliminating substandard housing and homelessness worldwide and to making adequate, affordable shelter a matter of conscience and action. Our ministry was founded on the conviction that every man, woman and child should have a simple, decent place to live in dignity and safety. In accordance with our foundational mission and principles, we are committed to the highest ethical standards and oppose all forms of abuse, discrimination, exploitation and harassment ("harm").

This Child and Adult Safeguarding Policy — also referred to herein as the "safeguarding policy" or the "policy" — reflects our pledge to create and maintain a work and life environment that is safe, productive and respectful for the children and adults we serve. We believe that every child and adult with whom we have contact, whether intentional or incidental, has the right to be protected from any harm that can arise during our operations or project activities. Moreover, we recognise the unique vulnerabilities of children and at-risk adults living in fragile contexts and remain steadfast in our commitment to be a safe organisation for all whom we serve or with whom we have contact.

This policy defines Habitat for Humanity Australia's approach to creating safe, healthy workplace, operational and project environments. The accompanying Child and Adult Safeguarding Procedures document — also referred to as the "safeguarding procedures" — provides guidance on how operational and project teams can make this policy actionable and adapt practices for the contextual needs and risks associated with the project and/or community. The directives contained in this policy, unless specified otherwise, are intended to apply to the conduct of Habitat for Humanity Australia's representatives, as defined in Appendix A. See further detail on scope of specific elements of the policy as regards different representative types in Appendix D.

## Policy framework

We recognise that building and sustaining a safe organisation requires a commitment to children and families who partner with Habitat, community members, partners and our colleagues. This policy establishes our commitment to children and at-risk adults in communities where we operate, and our staff and volunteers by referencing and acknowledging the role of other policies in reinforcing HFHA's responsibility to create and maintain operational, programmatic and workplace environments that are safe, inclusive and healthy for everyone. Our Safeguarding Policy Framework organises safeguarding-related policies, procedures and materials in a way that is accessible and user-friendly. This framework includes but is not limited to the following policies and materials:

- 1) HFHA Child and Adult Safeguarding Policy
- 2) HFHA Child and Adult Safeguarding Procedures
- 3) Ethics Covenant (Code of Conduct)
- 4) The Following Policies included in the HFHA **Employee Handbook**
  - a) Diversity and Inclusion
  - b) Anti-harassment and Non-discrimination
  - c) Sexual Harassment
  - d) Workplace Bullying
  - e) Victimisation
  - f) Complaints Procedure
  - g) Whistleblowing
  - h) Child Protection
  - i) Cyber Bullying
  - j) Staff Grievance/Dispute Resolution Process
- 5) HFHA Diversity and Inclusion Policy
- 6) HFHA Complaints Policy
- 7) HFHA Use of Photos and Stories Policy.
- 8) HFHA Recruitment Policy
- 9) Volunteer Code of Conduct
- 10) HFHI Safeguarding Self-Assessment

- 11) HFHI Safer Programming Guidance Note
- 12) HFHI Survivor Support Framework

This policy has also been developed considering HFHA's obligations under Australian law and our commitments as an Australian Council for International Development Member and DFAT Accredited organisation. HFHA adheres to the Australian National Principles for Child Safe Organisations, which are:

- Child safety and wellbeing is embedded in organisational leadership, governance and culture
- Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously
- Families and communities are informed and involved in promoting child safety and wellbeing
- Equity is upheld and diverse needs respected in policy and practice
- People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice
- Processes to respond to complaints and concerns are child focused
- Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training
- Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed
- Implementation of the national child safe principles is regularly reviewed and improved
- Policies and procedures document how the organisation is safe for children and young people

## Policy statement

Every person — child or adult — has the right to be treated with dignity and respect. We recognise and acknowledge our duty of care — our organisational, collective and individual responsibilities to safeguard children, families who partner with Habitat, program participants, community members with whom we have contact, and our colleagues and volunteers. This safeguarding policy has been developed as part of our safeguarding framework to reinforce the principles of “do no harm” and gender equality and is part of our risk-based approach to preventing and deterring unintentional or deliberate behaviors, actions or programming by Habitat for Humanity Australia representatives that create a risk of or result in child and adult abuse; discrimination; sexual exploitation, abuse and harassment, or SEAH; and labour exploitation. **HFHA maintains a zero tolerance approach for any abuse of power**, including sexual exploitation, abuse and harassment of children or adults. All concerns, suspicions or known abuses of power must be reported in accordance with reporting protocols. Our Whistleblower Policy prohibits retaliation against any reporter acting in good faith, even if the allegation is later unsubstantiated. HFHA is committed to preventing a person from working with children if they pose an unacceptable risk to children.

We acknowledge that inherently unequal power dynamics exist between HFHA and children, families who partner with HFHA, and adults living in the communities where we operate. Housing inequities, disaster responses and community impact projects increase the likelihood of power being abused. Therefore, HFHA strictly prohibits sexual activity with any person under the age of 18 years old, regardless of the legal age of consent in the country where the child lives or the contact occurs. Mistaken belief in the age of the child is not a defence. Habitat for Humanity Australia also prohibits sexual activity with any program participant, project recipient or community member. And, during the project implementation period, sexual activity and relationships between and among staff members and volunteers who meet through the Habitat for Humanity Australia project are strongly discouraged. Volunteers must also adhere to the policies restricting relationships with community members unless they live in and are from the community.

When any abuse of power is reported, we maintain a **zero tolerance for inaction** approach. This means reports will be treated seriously, triaged and investigated in accordance with the respective HFHA and Habitat for Humanity International investigations and disciplinary procedures. All legal actions will be pursued in consultation with the **affected person**. Where the affected person is a child, the child and the child's parent, legal guardian or caregiver

will be consulted - except in relation to child protection matters in Australia, where information must be shared with authorities without the consent of a parent, guardian, individual or family to keep children safe (see more detail in [Standard 11](#)). HFHA will pursue the necessary legal action to uphold the **best interests of the child** and comply with the governing local or national laws.

## Policy scope

This policy applies to all Habitat for Humanity entities in Australia including Affiliates. Habitat for Humanity Australia personnel must review the policy, complete the [Individual Acknowledgment Form](#) (Appendix B1), and submit the completed form to the designated staff member in each office. Every Habitat branch and national organisation must sign the [Policy Acknowledgment Form](#) (Appendix C) upon receipt or adoption of the policy or any updates and submit the acknowledgment to the entity's respective area office safeguarding regional adviser.

All Habitat for Humanity Australia [representatives](#) are required to read and sign the [Safeguarding Behavioural Commitments Acknowledgement](#) (Annex B2). Habitat for Humanity Australia representatives are responsible for understanding how safeguarding is applicable to their roles and responsibilities and for taking appropriate steps in accordance with this policy and its accompanying procedures to mitigate identified safeguarding risks.

Treating others with dignity and respect is a value that extends beyond working hours. Habitat for Humanity Australia representatives are expected to engage in the highest ethical standards during interactions with each other, our partners, families who partner with Habitat, and community members. This policy and its commitments are applicable to both the professional and personal lives of our representatives. Ethical behaviors by all Habitat representatives are expected 24 hours a day, seven days a week, including before, during and after business hours. Failure to comply with these standards is grounds for disciplinary action, may be considered as gross misconduct and may result in termination.

## Implementation

### Safeguarding principles<sup>1</sup>

By living our values of humility, courage and accountability, we create safety for our colleagues, children, families who partner with Habitat, community members, and our partners. We ask that each Habitat for Humanity Australia representative reflect on how they can contribute to a healthy organisation and safeguard those with whom they have contact from preventable harm.

1. We will work in community with children and adults to promote and uphold their rights to be protected from harm during our operations and project activities.
2. We will engage children and adults with empathy and treat each person with respect, courtesy and dignity.
3. We recognize the inherently unequal power dynamics between Habitat for Humanity Australia and the communities where we operate and the particular vulnerability to abuses of power that these differentials create. Any abusive, harassing, humiliating, degrading, discriminatory or exploitative behavior demonstrated by our representatives toward any person is unacceptable.
4. We acknowledge the power we hold and the trust that has been given to us. We will not engage in any abuse of power or trust that harms children or adults in the community.
5. We believe in creating systems of transparency to build safe and healthy operating environments with the aim of preventing child abuse; sexual exploitation, abuse and harassment, or SEAH; discrimination; and labour exploitation.
6. We will continue to evolve our safeguarding practices and engage colleagues with humility and grace as we learn and make adjustments to strengthen our safeguarding systems.

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<sup>1</sup> Principles 1-6 reflect Habitat for Humanity's organisational values and DEI commitments to transformational change adapted for safeguarding: community, empathy, vulnerability, trust, transparency and grace.

## Behavioral commitments

1. We will work to create and maintain safe and healthy working environments that prevent sexual exploitation, abuse and harassment and promote the implementation of the Habitat for Humanity Australia Code of Conduct. Managers across all levels of the organisation have particular responsibilities to support and develop systems that maintain a healthy workplace culture and environment.
2. We recognize that acts of sexual exploitation, abuse and harassment, or SEAH, constitute acts of gross misconduct and are, therefore, grounds for termination of employment or contract.
3. We prohibit sexual activity, including any direct or indirect contact or **grooming**, with any child (a person under 18 years old) regardless of the age of majority or consent in the local context. Mistaken belief regarding the age of a child is not a defence.
4. We prohibit the exchange of money, employment, goods, special considerations or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior. This includes any assistance that is due to families who partner with Habitat, program participants or recipients, or other community members.
5. We prohibit any sexual relationship between a Habitat for Humanity Australia representative and any person benefiting from Habitat for Humanity Australia programs or projects. We recognize that this type of relationship is improper because it is based on inherently unequal power dynamics, thus undermining the credibility and integrity of Habitat for Humanity Australia's charitable mission.
6. We will maintain an organisational mandate that if a Habitat for Humanity Australia representative has a concern or suspicion about, or knows that a colleague has engaged in, SEAH or any other unsafe or harmful behavior, whether in the same organisation or not, they must report their knowledge or concern via the **Habitat Ethics and Accountability Line**, or HEAL, or another available reporting mechanism immediately or within 24 hours. All concerns reported in other available mechanisms will also be reported via **HEAL**.
7. We prohibit **modern slavery** or any trafficking of people — children or adults — for procurement of commercial sex acts; **commercial sexual exploitation of children**, or CSEC; or forced labour.
8. We have zero tolerance for any representative accessing, possessing or circulating pornographic materials or indecent content, images, videos or messages of children or adults using phones, computers, email accounts, electronic distribution lists, Habitat for Humanity Australia -paid internet connections, or VPN services. Inappropriate content sent to an individual or group via text containing explicit language, messages or jokes will not be tolerated.
9. We actively support the legal prosecution of individuals in cases of substantiated misconduct if doing so is consistent with the wishes of the affected person or, where the victim is a child, it is in the best interests of the child.
10. We engage a trauma-informed, person-centered approach to consult with anyone harmed by misconduct involving a Habitat for Humanity Australia representative or unsafe programming. The provision or referrals for care will be made in accordance with the person's wishes. We recognise that children have the right to express their views, and for those views to be considered and reflected in decisions for their care.
11. We respond to all reports and investigate allegations, as necessary, to ensure accountability and administer proportionate discipline in cases of substantiated misconduct.

## Safeguarding pillars

Habitat for Humanity Australia has a commitment to ensure that our operations and programs are safe for children, families who partner with Habitat, community members, and Habitat for Humanity Australia representatives and volunteers. All representatives are prohibited from engaging in any abuse of power. In furtherance of this policy, our safeguarding procedures describe activities to make this policy and our commitments actionable.

- **Governance and culture:** We will foster a safeguarding culture to protect children, at-risk adults, community members, and Habitat for Humanity Australia representatives from harm that may arise during our operations or project activities. As we continuously learn and evolve our safeguarding approaches and systems, we will adopt a structure to support us in the achievement of our safeguarding objectives. Our leadership will remain

steadfast in its commitment to safeguarding and prioritization of best practices, accountability and risk management.

- **Prevention:** We will implement best practices to reduce the likelihood of safeguarding breaches. We will ensure safeguarding is mainstreamed across all departments and functions and is integrated throughout the project life cycle.
- **Training and awareness:** We will deliver and make accessible the necessary safeguarding training so that all Habitat for Humanity Australia representatives understand their responsibilities for protecting children, adults and community members from foreseeable and preventable safeguarding risks. Habitat for Humanity Australia representatives will understand their obligation to contribute to healthy office, operational and program environments to protect each other from workplace harms. We will ensure that communities are aware of the Habitat for Humanity International Ethics Covenant in order to socialise their right to be protected from harm that may arise during Habitat for Humanity Australia operations and activities.
- **Reporting:** We commit to educating all Habitat for Humanity Australia representatives about their responsibilities for reporting any concerns, suspicions or known safeguarding incidents. We will ensure that safe, confidential and accessible reporting channels are available to representatives, and we will encourage families who partner with Habitat, children, at-risk adults, and community members to share their concerns through the preferred reporting method.
- **Response:** We will act swiftly and with care whenever a safeguarding allegation is reported. We will prioritize the care and needs of any child or adult affected or harmed by misconduct or unsafe programming conditions and consider the wishes of the affected person through consultative decision-making. Trauma-informed practices will be applied to all investigations and case management activities, and disciplinary actions will be consistent and proportionate to any allegation that is substantiated. We will hold all information confidential and share information only when required by established legal, regulatory or donor mandates.

## Governance

The Habitat for Humanity Australia and Affiliate Boards of Directors will exercise oversight to ensure adoption and implementation of the Safeguarding Policy. The Chief Executive Officer is accountable for prioritising safeguarding objectives and delivering organisation wide communications about this policy and the accompanying procedures. The Senior Leadership Team is accountable for the implementation and management of this policy at all levels of the organisation.

## Roles and responsibilities

- **Habitat for Humanity Australia Safeguarding Officer and Affiliate CEOs:** This role is responsible for coordinating and championing the mainstreaming of safeguarding, whether at the country, affiliate or program level. Primary responsibilities of focal points include delivering training and ensuring that representatives and community members can access reporting channels.
- **Habitat for Humanity Australia human resources and Affiliate CEOs:** This function is responsible for hiring and onboarding candidates, tracking the completion of mandatory training, managing personnel/disciplinary records, and applying personnel action whenever a safeguarding breach has occurred.
- **Habitat for Humanity Australia and Affiliate managers:** These roles are responsible for ensuring that their respective teams mainstream and implement the safeguarding procedures. Managers will ensure that project teams complete safeguarding risk assessments and develop mitigation and monitoring plans that are evaluated throughout the project life cycle. If a manager is told, learns about or witnesses a safeguarding incident, they must ensure that the allegation, including any unsafe programming concern, is reported to HEAL.
- **All Habitat for Humanity Australia representatives:** Our safeguarding values and principles codify the behaviors to which every representative is expected to understand and conform. All representatives are expected to be able to recognise and be alert for the signs of potential safeguarding misconduct and have an obligation to report any concern, suspicion or known safeguarding breach as outlined in this policy and to cooperate with any subsequent investigation.

## Pillars of safeguarding

### Governance and culture

#### Standard 1: Fostering a culture of safeguarding

- **Policy review:** Our Safeguarding Policy and its procedures will be reviewed at a minimum every four years to ensure they evolve with and meet the requirements of the sector.
- **Annual review and verification, or ARV:** To support a culture of safeguarding accountability, Habitat for Humanity Australia will complete an ARV to acknowledge compliance with the Safeguarding Policy and its procedures. The ARV will use the standards outlined in this policy to inform the annual safeguarding plan. Any gaps that have been identified will be documented in an annual safeguarding plan with assigned roles, responsibilities and timelines to meet the requirements of the standard.
- **Board designation:** Habitat for Humanity Australia and each Affiliate will designate a safeguarding board representative to enhance the visibility and prioritisation of child and adult safeguarding by serving as an advocate within the board and Habitat for Humanity Australia and Affiliates. The representative will receive periodic updates on the status of safeguarding within Habitat for Humanity Australia. Additionally, the representative will oversee safeguarding improvements, controls and processes and will ensure the board considers safeguarding in its decision-making processes.
- **Safeguarding strategy and personnel:** To drive strategy and ensure implementation of day-to-day safeguarding measures, the Safeguarding Officer will work with other functions and departments, including Affiliates, to support them to meet their safeguarding [roles and responsibilities](#).
- **Leadership responsibilities:** Our senior leadership team will ensure that safeguarding is a recurring agenda item for all regularly scheduled meetings and any safeguarding-related discussions or decisions are reflected in meeting minutes.
- **Communications and fundraising guidelines:** We are committed to preventing harm that may ensue as a result of the use of images, videos and stories in internal/external communications and fundraising. The use of photos, videos or storytelling, especially of children and at-risk adults on personal social media accounts, is strongly discouraged. In particular, we understand the ethical responsibility to represent children, adults and community members with dignity, respect and resiliency. We will not tolerate imagery or storytelling that reinforces negative stereotypes. All images, videos and stories will comply with the communications and fundraising guidelines set forth in our safeguarding procedures.

#### Standard 2: Establishing accountability

- **Personnel:** All Habitat for Humanity Australia representatives as required in Appendix D will receive and acknowledge the policy. Records of this acknowledgement will be maintained by Human Resources. We will ensure that all representatives understand and fulfill their responsibilities to safeguarding through our annual performance review process.
- **Budgets:** Habitat for Humanity Australia will fund operational and resourcing costs for safeguarding personnel and related activities.
- **Performance Measurement:** The annual safeguarding plans provide annual review and verification provide the basis to assess progress against safeguarding compliance.
- **Board engagement:** The HFHA and Affiliate boards will play a key role in driving the organisational prioritisation of safeguarding. On an annual basis, the board will review the status of safeguarding and make recommendations for improvements, as needed.

#### Standard 3: Risk management

Safeguarding is integral to our Risk Management Framework, and our risk appetite for safeguarding breaches is very low. The framework is supported by HFHA and Affiliate Risk Registers, and program-level safeguarding risks assessments, or SRAs. Our risk registers provide a top-down approach that aims to identify general safeguarding risks, assess our organisation's capacity for managing the risks, and implement mitigation measures to guard against safeguarding breaches



that may interfere with our operations and projects and/or lead to serious harm of a child, adult, community member or Habitat representative. The SRAs contextualise our safeguarding practice to specific projects so that we can reduce the likelihood of child abuse; sexual exploitation, abuse and harassment; discrimination; and labour exploitation as we engage with communities. Through our risk-based approach, we embed these risk management practices into Habitat for Humanity Australia at all levels and ensure these practices are consistently applied, monitored and evaluated. We recognise the active commitment that robust risk assessments demand, and we will support our representatives to apply a risk-based lens throughout the project life cycle, whereby we design, implement, measure and adjust safeguarding practices according to the associated risks.

Our belief in prevention through risk management applies not only to Habitat for Humanity Australia staff members and volunteers, but also to our partners and others working on our behalf. We will ensure that risk management obligations are clearly communicated to contractors, vendors, suppliers and implementing downstream partners, and we will share safeguarding risks and mitigation plans whenever possible and practical.

## Prevention

### Standard 4: Safe recruitment

Safe recruitment practices will be routinely applied to ensure that every candidate is suitable to work with children and at-risk adults living in fragile contexts, and that they are able to live our values by contributing to a safe and healthy workplace culture. Our commitment to safer recruitment includes:

- Contextualised job descriptions.
- Notice of safeguarding commitments within the job advertisement.
- Robust interviewing practices where safeguarding is a core and consistent part of the process.
- Thorough reference check questions to assess attitudes, behaviors and commitment to safeguarding.
- Background record check.

The Child and Adult Safeguarding Procedures and HFHA Recruitment Policy provide guidance for Human Resources and hiring managers.

### Standard 5: Safer programming

Safer programming practices reflect Habitat for Humanity Australia's commitment to identify risks and prevent safeguarding breaches throughout the project life cycle. All project and program proposals include child and adult safeguarding considerations with accompanying resources to support cross-cutting and contextual safeguarding activities. During program design, our teams will ensure that risk assessments, mitigation measures and monitoring plans have been developed in collaboration with regional safeguarding advisers or designated safeguarding focal points, as needed, to ensure a robust and holistic safeguarding assessment at the onset. Additionally, all project designs will include donor-specific requirements to fulfill obligations and meet compliance standards. In addition to the Safer Programming Guidance Note, documents and materials that support our safer programming approach include:

- Project design documents
- Budgeting
- Project risk assessments – which include safeguarding risks and mitigants
- Gender and Disability analysis (for international projects)
- Safer programming checklist

Children are not to be present at a work site unless there is a plan to engage them in accordance with Standards 7 and 8. If a child's presence is unavoidable, then they must be accompanied by a parent, guardian or staff member of a beneficiary organisation at all times. HFHA representatives must leave the work site if this standard is not complied with.



### Standard 6: Safe partnerships

Partner and project agreements include a safeguarding clause outlining required actions and responsibilities for carrying out projects in accordance with Habitat for Humanity Australia's Child and Adult Safeguarding Policy or the partner's own policy, whichever offers greater protections to children and adults in fragile contexts. Partners are responsible for assuming a risk-based approach to projects, and Habitat for Humanity Australia will collaborate with partners to identify, mitigate and monitor risks that are likely to arise during the project life cycle.

We will undertake the necessary steps to ensure that downstream partners<sup>2</sup> undergo a due diligence assessment to the nature and extent of their engagement, to help ensure compliance with minimum safeguarding standards and/or identify areas for capacity building. All downstream partners must have their own safeguarding policy or formally adopt and understand HFHA's Safeguarding Policy.

All downstream partners agree to train their representatives on safeguarding with a focus on prevention, awareness, reporting and response obligations. The partner can request Habitat for Humanity Australia support in capacity building, wherever needed. Partners may agree to adopt Habitat for Humanity Australia's reporting systems or develop their own reporting channels. Regardless of the elected reporting mechanisms, partners must share all reported concerns affecting Habitat for Humanity Australia-funded activities within 48 hours or two business days. In addition, partners will disclose the findings of all completed investigations on Habitat for Humanity Australia-funded activities within five business days of conclusion. The partner report shall include the outcome of the investigation, along with any personnel or organisational action taken to address the misconduct and reduce the likelihood of recurrence. (For more detail on reporting obligations, including for projects supported with DFAT funds – refer to [Standard 11](#)).

Partners must agree to take the necessary action to respond to reported concerns swiftly and with care, exercising recognised standards for delivering supportive care and services, mobilising an investigation (as needed), taking remedial personnel action, and documenting management responses for all substantiated allegations.

### Standard 7: Volunteer management

Volunteers are expected to contribute to safe and healthy project environments. All volunteers, whether children, youth or adults, are prohibited from engaging in behaviors that create *a risk of or actually result in* harm, as outlined in our Volunteer Code of Conduct. All Habitat volunteers are expected to respect the rights of children and adults and to protect them from harm throughout the volunteer commitment. The safeguarding principles and behavioral commitments outlined in this policy apply to volunteers of all ages, backgrounds and abilities.

Habitat for Humanity Australia vets volunteers based upon guidance and legal requirements and considering the level of risk different types of volunteering pose. Vetting processes and training and induction for different volunteer types are described in [Appendix D](#). An appropriate supervision plan will be developed for every project involving volunteers, especially where children are present.

We believe that child and youth engagement is important. For this reason, we have created child engagement guidance, outlining active supervision standards, ratio requirements and child labour restrictions to ensure the safety and well-being of children on or off work sites and during activities. These apply to both child participants and child volunteers.

### Standard 8: Community engagement and child participation

Community engagement is an important part of creating a safeguarding culture that encourages partnership with the community and seeks to include child participation so that projects are child- and adult-focused *and* community-driven. Habitat for Humanity Australia will ensure that communities — especially children and adults in fragile contexts — understand and exercise their right to be protected against child abuse, discrimination, SEAH, labour exploitation or other forms of harm. Habitat for Humanity Australia will work strategically with other functions to partner with communities in meaningful and sustainable ways. To identify existing vulnerabilities and risks, Habitat for Humanity

<sup>2</sup> Downstream Partners are organisations funded by HFHA to deliver programs – including Habitat entities in the Asia Pacific and their local implementing partners.

Australia will engage in community assessments whereby we will meet with key stakeholders, including but not limited to children; women; LGBTQI+; people with disabilities; people in ethnic, racial, religious and cultural minorities; and elders, to understand the local context.

We recognise the strength and capabilities of the people we serve and the communities where we operate. We are committed to listening to their voices — individual and collective — to apply their suggestions and feedback and share our power across the continuum of decisions that affect the lives of community members. Through our monitoring and evaluation protocols, we will seek feedback on safeguarding from children and adults and schedule regular focus group discussions to raise visibility about their rights.

## Training and awareness

### Standard 9: Training and management responsibilities

- **Mandatory training:** Safeguarding induction training is mandatory as part of onboarding for all Habitat for Humanity Australia and Affiliate staff members, volunteers and board members [within 30 days] **and** prior to contact with children, families who partner with Habitat, and community members. Representatives who have not completed the safeguarding induction will not be able to work in communities until verification of training has been completed. The safeguarding induction training will engage representatives so that they are able to prevent, recognise and detect, report, and respond to any concerns, suspicions or known incidents of a child or adult safeguarding breach.
- **Contextualised training:** Project teams, including disaster and emergency response, may be required to engage in contextualised training in addition to the mandatory induction.
- **Refresher training:** Refresher safeguarding training is required annually for general staff members and key volunteers. Project teams may be required to complete supplemental and/or contextualized safeguarding training more frequently, in accordance with project risks and donor requirements.
- **Managers:** As part of their responsibilities for creating and maintaining a safeguarding environment, managers are responsible for ensuring their team members complete all required training. Managers must also communicate any safeguarding-specific responsibilities that team members have during the life cycle of the project.
- **Implementing partners:** For information related to training for implementing partners, please review [Standard 6](#).
- **Visitors:** All [casual visitors](#) and visiting Habitat for Humanity Australia staff members are given a verbal safeguarding briefing before visiting a project site when beneficiaries are present on site. Whenever possible and according to local practice, visitors will sign the Code of Conduct.

### Standard 10: Raising awareness

- **Awareness materials:** Signs or posters will be affixed in all Habitat offices and at work sites with messaging about the “do no harm” principle and information on how to report a safeguarding allegation. Such messages may include “zero tolerance” for child abuse, SEAH, labour exploitation, and other human rights abuses; the right of community members to be protected from such harms; and Habitat’s prohibition against the exchange of services or resources for sex or exploitative labour (e.g., drawing a distinction between sweat equity and forced labour).
- **Availability of information:** Safeguarding information and policies will be available in local languages. Materials will be child-friendly and understandable across a range of cognitive and developmental abilities. Words and concepts used in awareness-raising materials will be adapted to the local context. Communities will have access to information about the safeguarding risks and project benefits associated with Habitat’s work in the community. Internally, the policy will be used in training, induction and made accessible at all times. For external stakeholders’ policy and information of reporting channels will be made available via HFHA’s website.
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## Reporting

### Standard 11: Reporting procedures and mechanisms

We endeavor to prevent harm through the activities outlined in this policy and its accompanying procedures. We also recognise that in our endeavor to reduce safeguarding incidents from occurring or recurring, our representatives have the responsibility of detecting and reporting concerns, as early as possible, to interrupt harms to children, at-risk adults, community members and our colleagues, whether internal or external to Habitat. All Habitat offices are expected to adopt clear management protocols and procedures on how to manage a safeguarding concern.

- **Responsibility to report:** All Habitat representatives, especially managers, have the responsibility to report *any* conduct or unsafe programming activities that may be a breach of this policy or its procedures. Further, HFHA has certain obligations under Australian law for mandatory reporting of suspected child abuse or neglect (more detail provided in **External Reporting** below and in detail in Standard 11 of the Safeguarding Procedure).
- **Whistleblower Policy:** HFHA's Whistleblower Policy expressly prohibits retaliation and protects representatives engaged in good faith reporting from retaliation or any threat of retaliation by any other Habitat representative. Any person who engages in retaliation will be subject to discipline, up to and including termination of employment. (*Note: Intentional submission of false allegations is a fraudulent activity and will be handled in accordance with HFHA's policies.*)
- **Failure to report:** We recognise our collective duty to create safe, healthy work and project environments. Failure to timely report a safeguarding concern, suspicion or known incident will be subject to discipline, up to and including termination of employment or contract. Failing to report is a serious breach of this policy and leaves the child, at-risk adult, community member or colleague experiencing the alleged harm vulnerable to further harm without appropriate and timely intervention.
- **Reporting misconduct or unsafe programming:** Any HFHA representative who receives a safeguarding complaint or who has knowledge or reasonable suspicion of safeguarding misconduct (whether by an HFHA representative or any other organisation's representatives operating in the local context) or who knows of any unsafe programming risks must engage the following protocol:
- **How to report:** Inform a direct supervisor of the concern, suspicion, incident or complaint. Any report or complaint is to be reported immediately to the Safeguarding Officer who will immediately inform the HFHA CEO and Chair of the Board of Directors, and where relevant the local Affiliate CEO and Board Chair. If the representative has reason to believe that any of these people may be involved in the misconduct or has a conflict of interest in connection with it, the reporting party may report to: The Asia Pacific Office safeguarding officer, or the Habitat Ethics and Accountability Line, or HEAL

All reported concerns and allegations received must be entered into HEAL within 24 hours of notice by the Safeguarding Officer.

- **Confidentiality and anonymity:** All safeguarding reports are confidential. A person can report a concern anonymously or in name. A representative may choose to report a concern anonymously — in other words, without identifying who they are. When a report is made anonymously, Habitat for Humanity Australia has no means for identifying or attributing the source of the information. **Timing:** All Habitat for Humanity Australia representatives are required to report any safeguarding concern as soon as it becomes known but, in any case, within 24 hours or one business day.
- **Local reporting mechanisms:** Habitat for Humanity Australia will ensure that there are project-specific, local reporting mechanisms that are functional and confidential for all children, adults, community members and Habitat for Humanity International representatives to access.
- **Report management:** All reported concerns of unsafe programming or alleged safeguarding misconduct are managed through HEAL. It is critical that any concern, suspicion or known incident is reported in a timely manner to ensure that Habitat for Humanity Australia can mobilise a response to interrupt harm, address any imminent safety issues, and deliver time-sensitive care and services. HEAL is Habitat for Humanity International's confidential, anonymous reporting hotline and central tracking repository for allegations of

serious misconduct made by or against any Habitat stakeholder anywhere in the Habitat for Humanity International network.

- **Reporter's responsibilities:** Because of the sensitivity of safeguarding, anyone reporting a concern ("**reporter**") must **not** start an investigation on their own or engage in investigation-type activities. Reporters are responsible for reporting information shared with them or events that they heard or witnessed directly but should refrain from gathering evidence or questioning the child, adult or staff member affected by the alleged misconduct or unsafe programming activity. Furthermore, reporters must not inform or question potential witnesses or the person who has allegedly engaged in misconduct.
- **Community feedback loop:** Whenever safe and practical, Habitat for Humanity Australia will provide feedback to the community about reported safeguarding incidents to ensure transparency and accountability in the management of each concern. Because of confidentiality, it will not be possible to share specific information without the full informed consent of the person affected, including assent from any affected child. For international programs, the regional safeguarding adviser or a designee will collaborate with the MEAL team to design a feedback loop as part of the local community feedback and reporting mechanism.
- **External reporting to authorities, donors or the public:** HFHA has existing commitments to report based on contractual agreements and Australian law. Specific requirements for immediate reporting on DFAT-funded projects as well as mandatory reporting obligations in Australia are set out in Standard 11 of the Safeguarding Procedures document.

As appropriate to raise awareness and demonstrate public accountability, Habitat for Humanity International (and/or a designated Habitat entity) may voluntarily share information related to allegations of safeguarding misconduct and/or investigations, as guided by the requirements of transparency (to donors, regulators) and confidentiality (protection of affected parties).

Habitat for Humanity Australia and/or Habitat for Humanity International may choose to report certain issues to donors or governing bodies where no clear contractual or legal requirement exists but where we determine the disclosure to be in the best interest of the public trust.

Habitat for Humanity Australia and Habitat for Humanity International will provide the Habitat for Humanity International board of directors and Habitat for Humanity Australia's board of directors with routine updates on safeguarding allegations and investigations to facilitate proper oversight.

## Response

### Standard 12: Responding to reported concerns

Habitat for Humanity International handles all safeguarding investigations with due diligence and professional care and has established an independent investigations unit within the Governance, Risk Management and Compliance, or GRC, department. The GRC unit is composed of experienced investigators specifically trained in safeguarding investigations, including sexual exploitation, abuse and harassment. In addition, GRC's investigators may partner with third-party legal and investigative experts to assist in conducting safeguarding investigations. Further details of the expected processes when conducting appropriate safeguarding investigations can be found in the safeguarding procedures and the Investigations Handbook.<sup>3</sup>

- **Investigation procedures and legal mapping:** Our investigation procedures include best practices and established protocols to ensure due process and consistent management of safeguarding allegations. Upon receipt of an allegation, the report will be screened and triaged to ensure all necessary information has been reported so that Habitat for Humanity International can plan the best approach and mobilise a response, which may include coordination with Habitat for Humanity Australia. As part of our response, we will engage in a legal mapping exercise to comply with local or national laws while identifying any protective risks that may threaten further harm (e.g., if reporting to local authorities increases harm to the affected child or adult).

<sup>3</sup> Available on MyHabitat's International Knowledge Center or by request to the GRC department.

- **Trauma-informed practice:** We will engage trauma-informed practices by consulting with any child (or their parent or guardian in the case of a young child) or adult harmed by alleged misconduct to ensure that their rights and wishes are prioritised and supported. HFHA and its Affiliates will ensure that they have access to suitable expertise to ensure that practices are trauma-informed
- **After- and survivor-care referrals:** Any child or adult affected by misconduct (“victim,” “survivor” or “affected child/adult/person”) has the right to receive imminent and extended care to assist in their recovery from harm. Our Safeguarding Survivor Support Services Framework aims to guide all organisations operating under the Habitat for Humanity International network (including Habitat for Humanity Australia and Affiliates) to comply with the expectations to provide appropriate assistance to any child or adult affected by a safeguarding breach. Habitat for Humanity Australia, with the support of Habitat for Humanity International, will consult with the affected child or adult to conduct a Safety and Risk Assessment, which will inform the short-, mid- and long-term care needs and risks associated with the delivery of care and/or investigation activities. Habitat for Humanity Australia will work with local implementing partners to provide information on community-based services where referrals can be made.
- **Communications:** We are committed to communicating with the child or adult affected by the alleged misconduct throughout and upon conclusion of the investigation.
- **Investigations:** Habitat for Humanity Australia and/or Habitat for Humanity International will investigate all credible safeguarding concerns, collect evidence, conduct interviews with witnesses, and reach a conclusion based upon the weight of the evidence and applying the workplace standard of proof (e.g., more likely than not to have occurred).
- **Management response:** Final investigation reports will help to inform the necessary management response, action plans and/or application of lessons learned.

## Retaliation

We will not tolerate retaliation against any representative who has engaged in a legally protected activity. Protected activities include good faith reporting of a safeguarding allegation, participation in a safeguarding investigation, and reasonably opposing conduct made unlawful by the local laws, legislation or regulations where the misconduct is alleged to have occurred.

Anyone who has engaged in retaliation will be subject to disciplinary action, up to and including termination of employment or contract, and in accordance with our disciplinary protocols.

Retaliation can take many forms. Adverse actions that *may* indicate retaliation has occurred include but are not limited to:

- Demotion, reassignment, or transfer.
- Termination.
- Salary or benefit reduction.
- Exclusion or being passed over for opportunities.
- Denial of time off, a promotion or a raise.
- An unwarranted negative performance review.
- Harassment.
- Threats.
- Any other form of physical, psychological, social, spiritual or financial harm.

Any representative who experiences or believes they have experienced retaliation should **report** it immediately.

## Confidentiality

We observe the principle of **confidentiality** throughout our safeguarding case management processes. Wherever possible, private information will be shared with people who “need to know” and only after analyzing the requirements and use of the information. People who need to know may include specific people in Habitat for Humanity Australia and Habitat for Humanity International leadership, GRC/safeguarding investigators, or external parties such as attorneys, law enforcement, courts, regulatory authorities and/or donors.

We believe in managing information with confidentiality to:

- Prevent harm that can be caused when information is not shared in an ethical or responsible way.
- Safeguard against the misuse of information.
- Protect the reputation of people and Habitat for Humanity.
- Encourage reporting by building trust.

For these reasons, we will protect the identities of all witnesses (e.g., complainants, reporters, respondents and general witnesses) wherever safety issues require and whenever possible in conformity with local laws. Any information that Habitat for Humanity Australia or Habitat for Humanity International is required to share will be reviewed with the legal and GRC teams before it is released to any external party or authorities. In the case that confidential information must be disclosed, any witness will be informed about how their information is being shared.

## **Informed consent and assent**

We believe that fully informed consent and child assent are critical to promote the rights of children and vulnerable adults. As we engage children and adults, we are committed to ensuring that they understand the risks and benefits of their participation and the uses of their sensitive data or personally identifiable information.

We will never coerce, require, rush or manipulate any child or adult to consent or assent to any activity. Whenever the activity for which we are seeking consent and assent (e.g., photos for communications or fundraising) is *not required* to receive the service or benefit being offered, Habitat for Humanity Australia will not withhold or refuse services, programs or access to resources because of the child's or adult's refusal.

Children and adults may rescind informed consent or assent at any time. In any case where consent or assent of a photo, video or story has been revoked, Habitat for Humanity Australia will make reasonable efforts to ensure that all such materials are removed from circulation. The child and/or adult will be informed of any limitations involved in retracting materials (e.g., if images, films or stories are archived but searchable news articles, commercials or marketing materials have been released to the public) *at the time that informed consent and assent is given*.

## Appendix A: Definitions

**Abuse of power:** When a person uses their position of power, trust or influence to their own advantage, to place another person at a disadvantage, or to harm another person inadvertently or deliberately.

**Adult:** Any person over the age of 18 (in most countries).

**Affected person:** Sometimes referred to as the “complainant,” “survivor” or “victim.” The affected person is someone who has experienced the alleged misconduct or harm.

**Assent (child):** *Child assent* is the process by which a child is consulted about their participation and/or use of sensitive data or PII. Whenever consent is required for a child to participate in a project or for Habitat for Humanity to use their sensitive data or PII, child assent should be obtained contemporaneously to informed consent by their parent, legal guardian or responsible caretaker.

**At-risk adult:** A person over the age of 18 with a physical, mental or life status that causes particular vulnerability (such as a physical or mental disability), or any adult living in a fragile context that heightens the risk of an abuse of power because of limited access to basic resources, including food, housing, safety or water.

**Best interests of the child:** Deciding what type of services, actions and orders will best serve a child and who is best suited to take care of a child.

**Bullying:** A form of aggressive behavior that occurs in an intentional and repeated manner, causing another person to feel hurt. Bullying can take multiple forms, including spreading rumors, threatening, physical or verbal assault, engaging in insidious practices such as excluding a person from a group, or any other gestures or actions that occur in a less visible manner.

**Casual visitor:** Any short-term or one-time visitor. The casual visitor may be a nonrepresentative (e.g., donor, Habitat celebrity ambassador, guest) invited to visit a project site or participate in a Habitat-sponsored or Habitat-funded activity.

**Child:** Any person under the age of 18, regardless of the local legal age of majority or consent.

**Child abuse:** Any form of physical, emotional or sexual abuse; neglect; or exploitation resulting in actual or potential harm to the child’s health, well-being, survival, development or dignity by an individual or an institution. It includes but is not limited to any act or failure to act that results in death or serious physical or emotional harm to a child, or an act or failure to act that presents an imminent risk of serious harm to a child.

**Child labour:** Exploitive work that deprives children of their childhood, their potential and their dignity and is harmful to their physical, social, psychological and/or mental development. It refers to work that is mentally, physically, socially or morally dangerous and harmful to children and that may also interfere with their schooling.

**Child rights:** International standards memorialized within the [U.N. Convention on the Rights of the Child](#) that recognizes the unique vulnerabilities and protections for people under the age of 18. It also upholds the principles of treating all children, without distinction, with dignity and integrity.

**Commercial sexual exploitation of children (CSEC):** The sexual abuse or exploitation of a child in return for cash or any other goods or services. Examples of CSEC include child prostitution, child pornography or indecent images, and child sex tourism.

**Complainant:** Sometimes referred to as the “affected child or adult,” “survivor” or “victim.” The complainant is the person who has experienced the alleged misconduct or harm.

**Confidentiality:** Confidentiality refers to keeping a person’s or Habitat’s information private or protected.

**Disaster response:** Habitat’s progressing after a disaster or crisis, focusing on both early and long-term recovery.

**Discrimination:** Unjust or unfair treatment of people based on certain prejudices or characteristics, including an individual’s sex, sexual orientation, gender identity, race, ethnic background, national origin, age, religion, disability, military or veteran status, or other legally protected characteristic.

**Emotional abuse:** Any isolated or ongoing harm to a child’s or adult’s emotional, intellectual, mental or psychological well-being or development.



**Exploitation:** The actual or attempted abuse of a position of vulnerability, power differential or trust for the benefit of the individual leveraging their position, power, privilege or wealth, sometimes through enticement, manipulation, coercion or trickery, to engage a child or adult in labour, domestic servitude, forced criminality or other illegal acts to profit monetarily, socially or politically.

**Fragile or emergency contexts:** Geographic areas (e.g., communities, regions, countries) where there has been an emergency or destabilization due to a disturbance in social order or rule of law, or other disrupting event or where there is limited access to basic needs like clean water, food, shelter and safety.

**Good faith reporting:** The genuine belief that a risk or harm has arisen at the time it was reported.

**Grooming:** The process in which an adult or older child or youth builds a relationship with a child and/or the child's caretaker to gain the child's and caretaker's trust for the purposes of sexually abusing or exploiting the child.

Grooming can happen online or in person and is a gradual process that can sometimes be difficult to detect.

Grooming may include but is not limited to:

1. Showing preferential treatment or favor to a child.
  - Giving the child gifts, rewards or special privileges.
  - Removing the child from interactions with their peers or safe adults in their life.
  - Using knowledge of a child's vulnerability to build a close relationship.
  - Befriending the parents or caretakers who are responsible for protecting the child.
  - Allowing the child access to alcohol or drugs or encouraging illegal activity.
  - Building intimacy through "special" experiences shared only by the child and groomer.

**Harm:** Any form of abuse, discrimination, exploitation and harassment, or any injury resulting from unsafe programming.

**Harassment:** Any comment or behavior that is offensive, demeaning, humiliating, derogatory or otherwise inappropriate or that fails to respect the dignity of an individual. It can be committed by or against a beneficiary, partner, staff member, official or any other person involved in any way in a Habitat program or operation.

**Human rights:** International standards, as articulated by the [U.N. Universal Declaration of Human Rights](#), that recognize and protect the dignity and integrity of every individual without distinction.

**Informed consent:** The process by which a competent adult is given information about the risks, benefits and use of their information or that of their child so that they can make an informed decision about their participation and/or use of sensitive data or PII.

**Modern slavery (aka human trafficking or combating trafficking in persons, or TiP):** Holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour are to be construed in accordance with Article 4 of the Human Rights Convention, as further defined by the [UK Modern Slavery Act of 2015](#), and the U.S. government clause for [Combating Trafficking in Persons](#).

**Neglect:** The failure to meet a child's or adult's basic physical and/or psychological needs either deliberately or through negligence. This may include but is not limited to failure to prevent harm, inadequate supervision of children, failure to access urgent medical care for a child or adult, exposure to unsafe project environments (e.g., unsafe programming or access to harmful objects or building materials), and/or failure to properly child-proof project environments, as needed.

**Partner:** Any organisation receiving Habitat funding or supporting or implementing a project or program on behalf of Habitat. For HFHA this includes Habitat National Offices overseas and their downstream partners.

**Personally identifiable information (PII):** Any information that can be used on its own or with other information (e.g., triangulation) to identify, contact or locate a single person or group of people (e.g., a Habitat homeowner).

**Personnel:** Includes full-time employees, part-time employees, casual employees, contractors, consultants, Board Directors, Committee Members, National Office Volunteers and interns.

**Physical abuse or assault:** The non-accidental use of physical force that inadvertently or deliberately causes a risk of or actual injury to a child or adult.

**Pornography:** Any indecent images, videos or content involving the partial or full nudity of any child or adult.

**Prostitution:** The exchange of money, goods, resources or favors for any sexual act involving direct or indirect contact.

**Protection (child or adult):** In the humanitarian and development sector, protection is distinct from safeguarding. Protection concerns arise when a person *unaffiliated with Habitat* engages in harmful, abusive, discriminatory, exploitative or harassing behaviors toward a child or adult. For example, a child protection issue can involve the abuse or neglect of a child by their parent, a relative or another community member. Another example may be an adult from the community who is experiencing domestic violence (e.g., intimate partner, dating or familial violence). This would be considered an *adult protection* concern. In other words, protection issues involve abuses of power or acts of violence, maltreatment or harm toward children and adults by people within their family or community. Protection may necessitate external reporting. Safeguarding advisers should be consulted to determine if external reporting (e.g., law enforcement, child protection, elder services, etc.) is safe and practical within a specific context. It is possible for a protection concern to also be a safeguarding concern (and vice versa), so please speak with a safeguarding adviser, officer or focal point to ensure proper reporting of any concern, suspicion or known incident.

**PSEAH:** The protection from sexual exploitation, abuse and harassment.

**Reporter:** Any person who reports a concern, suspicion or known incident, whether anonymously or in name.

**Representatives:** An individual acting on behalf of Habitat for Humanity, including but not limited to board members, staff members, contractors/consultants, interns, volunteers, implementing partners and suppliers directly engaged in the delivery of community-based activities or who have access to sensitive data (such as builders, CRM provider).

**Respondent:** The person who is responding to an allegation of misconduct, or the person alleged to have engaged in misconduct.

**Retaliation:** Any negative or adverse action taken against any Habitat representative engaged in a protected activity (e.g., reporting an abuse of power or participating in an investigation).

**Safeguarding:** The organisational policies, procedures and practices identifying the behavioral expectations and prohibitions to ensure that interactions between Habitat representatives and children, adults, community members, partners and colleagues are safe, inclusive and healthy. Safeguarding policies, procedures and practices endeavor to ensure that abuses of power by Habitat representatives are first prevented. When an abuse of power occurs, safeguarding systems ensure that concerns, suspicions and known incidents are reported in a timely manner to allow for an organisational response that interrupts harm, assesses safety, delivers necessary care and services, and addresses misconduct through established protocols.

**Sexual abuse:** Any actual or threatened physical intrusion of a sexual nature (including inappropriate touching), whether by force or under unequal power dynamics or otherwise coercive conditions.

**Sexual exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including but not limited to profiting monetarily, socially or politically from the sexual exploitation of another.

**Sexual harassment:** Any unwelcome sexual advance, comment, expressed or implied sexual demand, touch, joke, gesture, or any other communication or conduct of a sexual nature (whether verbal, written or visual) that occurs between a Habitat staff member or representative and any person with whom they interact in their Habitat role. *For further details, see the Policy on Harassment, Bullying and Discrimination.*

**Suppliers and Contractors:** include companies paid to deliver services where there is direct interaction with community participants (eg builders, training providers) or who have access to sensitive information related to project participants (eg CRM/data companies)

**Survivor:** Sometimes referred to as the “affected person,” “victim” or “complainant.” The survivor is the person who has experienced the alleged misconduct or harm.

**Victim:** Sometimes referred to as the “affected person,” “survivor” or “complainant.” The victim is the person who has experienced the alleged misconduct or harm.

**Volunteer:** HFHA engages with a range of volunteers who provide different support and have different levels of exposure to communities and program participants. HFHA uses the following definition types:

- **Community Volunteer:** A Community volunteer is a registered volunteer who volunteers to support implementation of project activities as part of a volunteering program within Australia.
- **Corporate Volunteer:** participates in single day volunteer activity event coordinated on behalf of a

corporate partner.

- **Global Village (GV) Volunteer:** A Global Village volunteer is a registered volunteer who pays to partake in a week-long overseas volunteering program. GV Volunteers will depart their home country and fly to the Hosting Country (HC) where they will spend roughly a week in local accommodation, while partaking in various volunteer activities.
- **Habitat Women Trainee:** engaged in Habitat Women training program, and may involve in community project activities such as Brush With Kindness.
- **National Office Volunteer:** A National Office Volunteer is a volunteer or intern who is engaged by HFHA to undertake specific tasks on a regular basis over a period of weeks or months or longer. A person volunteering for a single day is not considered a National Office Volunteer.
- **Re-Store Volunteers –** volunteering in ReStore shops

**Youth:** Any person between the ages of 15 and 24, as defined by the United Nations for statistical analyses. It is important to note that the term includes people who are defined in this policy as both children and adults. For this reason, any engagement with anyone under the age of 18 must abide by the Safeguarding Policy provisions.

**Zero tolerance:** The organisational commitment to hold accountable any Habitat representative who engages in harmful, unhealthy or unsafe behaviors with any child, adult, community member, partner and/or colleague.

**Zero tolerance for inaction:** The organisational commitment to take all credible reportable concerns seriously and ensure proper care and support are provided to any person who has been harmed, abused, discriminated against, exploited and/or harassed.

## Appendix B: Individual Acknowledgment

### 1. Individual Policy Acknowledgment

This Safeguarding Policy describes Habitat for Humanity Australia's commitment to preventing and responding to harm caused by physical or sexual abuse or exploitation, harassment, or bullying of Habitat for Humanity representatives, people in the communities we serve (especially vulnerable adults and children), and people whom we partner with.

**I acknowledge that I have read and reviewed the requirements contained in the policy and agree that I will follow them.**

I further commit to report to **Habitat Ethics and Accountability Line reporting tool (HEAL)** any suspected safeguarding misconduct and to help to create and maintain an environment that prevents sexual exploitation and abuse; safeguards the rights of beneficiaries, research participants and community members (especially vulnerable adults and children); and promotes the implementation of Habitat for Humanity's Ethics Covenant and Code of Conduct. *(Note: Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.)*

I understand that I should consult with the Habitat for Humanity Australia Safeguarding Officer, my manager or the CEO regarding any questions I have about the application of this policy.

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Signature

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Date received

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Name (typed or printed)

## 2. Safeguarding Behavioural Commitments Acknowledgment

Habitat for Humanity representatives<sup>4</sup> will:

### 1. Treat all people with respect and dignity.

- ☐ In recognition of the fundamental rights of all people to live and work in environments free from all forms of harm, abuse, discrimination, bullying, exploitation and harassment, **I will** behave with the highest standards of ethics to uphold the safety, dignity and respect of every child, adult, community member, volunteer, partner and colleague with whom I have contact.
- ☐ **I will** engage others with cultural humility and contribute to safe workplace, operational and project environments that celebrate diversity, practice equity, prioritize inclusion and promote belonging.
- ☐ **I will** promote healthy communication void of shame, humiliation, belittling, degradation or any form of emotional abuse when engaging with children, adults, community members, volunteers, partners and colleagues.
- ☐ **I will** engage in conduct consistent with the Child and Adult Safeguarding Policy and policies outlined in the Safeguarding Framework.
- ☐ **I will** be a positive role model for children
- ☐ **I will** take responsibility for ensuring that I am accountable and do not place myself in positions where there is a risk of allegations being made.
- ☐ **I will** self-assess my behaviours, actions, language and relationships with children.
- ☐ **I will** comply with all relevant National child protection legislation, including labour laws in relation to child labour (and overseas laws if I am representing HFH in another country)
- ☐ **I will** consult with the Safeguarding Focal Point or other relevant staff if I have any questions regarding child protection and how it relates to my work/relationship with HFHA.
- ☐ **I will** immediately disclose all charges, convictions and other outcomes of an offence that relates to child exploitation and abuse, including those under traditional law, which occurred before, or during my association with HFHA.
- ☒ **I will not** abuse or misuse any power, influence, privilege, authority or trust I may hold.
- ☒ **I will not** engage in sexual activity with anyone under the age of 18, regardless of local laws or the age of consent. Furthermore, I will not engage in any relationship — sexual or otherwise — that may be exploitative or harmful.
- ☒ **I will not** meet alone with or show preferential treatment to any child. (A minimum of two adults will always be present when interacting with a child.)
- ☒ **I will not** engage in any behavior, including touching a child or adult, that is or can be interpreted as inappropriate, grooming, harmful or abusive.
- ☒ **I will not** do things of the personal nature that a child can do for him/herself, such as assistance with toileting or changing clothes.
- ☒ **I will not** invite unaccompanied children into my home/hotel or other private location, unless they are at immediate risk of injury or in physical danger.
- ☒ **I will not** sleep in the same room or bed as a child.
- ☒ **I will not** give or provide children with alcohol or illegal drugs;
- ☒ **I will not** condone or participate in, behaviour of children that is illegal, unsafe or abusive.
- ☒ **I will not** hold, kiss, cuddle or touch a child in an inappropriate, unnecessary or culturally insensitive way.
- ☒ **I will not** seek to make contact and spend time with any child or young person outside the program times.
- ☒ **I will not** use any computers, mobile phones, video and digital cameras, or social media inappropriately, nor use them for the purpose of exploiting or harassing children.

<sup>4</sup> Including but not limited to board members, staff members, contractors, interns, volunteers, implementing partners and suppliers.

- ☒ **I will not** solicit sex<sup>5</sup> or exchange money, employment, goods, special considerations, or services for sex, including sexual favors.
- ☒ **I will not** engage in any form of harassment, including comments, jokes, gestures, emails, suggestive looks, that are or could be interpreted as inappropriate, or other behaviors that may create discomfort; be unwelcomed; or otherwise result in a hostile, intimidating or difficult work or project environment.
- ☒ **I will not** exploit the labour of any person for professional or personal benefit or gain and ensure “sweat-equity” projects are clearly explained.
- ☒ **I will not** discriminate against any child, adult, volunteer, partner or colleague.
- ☒ **I will not** provide anything of value (e.g., money, goods, services, etc.) to project participants unless it is part of the project and there is clear communication about its purpose.

## **2. Protect sensitive data and personally identifiable information.**

- ☐ **I will** exercise care, practice confidentiality, and follow the Data Protection and Retention Policy when working with or managing sensitive data or personally identifiable information .
- ☐ **I will** obtain informed consent and assent by ensuring that any project participant — child or adult — is informed of risk, benefits and/or requirements in simple language that is easily understood prior to the provision of any service, benefit or use of data.
- ☐ **I will** follow the Communications and Fundraising Guidelines and only use photos, videos or stories depicting children, adults or community members (including families who partner with Habitat) for business purposes.
- ☐ **I will** only use official business channels to communicate with project participants and Habitat representatives and will make those communications available upon request.
- ☒ **I will not** exchange personal contact information or personal social media accounts with project participants (including families who partner with Habitat), child or adult volunteers, or members of the community where we operate.
- ☒ **I will not** make publicly available personally identifiable information and have been strongly discouraged from sharing photos, videos or stories, especially of children or adults from communities where we operate, through my personal social media accounts.
- ☒ **I will not** use my personal social media accounts, personal mobile phone, or personal email accounts to connect, “friend” or communicate with children or adults from communities where we operate.

## **3. Report concerns, rumors, suspicions or known safeguarding violations.**

- ☐ **I will** report any safeguarding disclosures<sup>6</sup>, concerns, rumors, suspicions or known incidents within 24 hours or at the earliest time a reporting mechanism is available.
- ☐ **I will** intervene, if safe and possible, to interrupt harmful behaviors.
- ☐ **I will** share all known information to ensure a timely response and provide additional information or evidence as requested.
- ☐ **I recognize** that “good faith” reporting is a protected activity and will share concerns even if I don’t have all the information.
- ☒ **I will not** delay in reporting, withhold information, or ignore requests for evidence.
- ☒ **I will not** deter reporting by a program participant, volunteer, partner or colleague.
- ☒ **I will not** retaliate against, treat poorly or engage in harassment toward anyone who has or is believed to have reported a safeguarding incident.
- ☒ **I will not** engage in malicious or “bad faith” reporting.
- ☒ **I will not** investigate a safeguarding matter myself or question individuals who may be involved in the matter.

<sup>5</sup> This applies even in jurisdictions where sex work is legal.

<sup>6</sup> Disclosures include reports from program participants or others who are unfamiliar with, may not have access to, or are not comfortable with directly reporting an allegation to [HEAL](#) or other established Habitat reporting mechanism.

**4. Respond to disclosures with care and cooperate with internal processes.**

- ☐ **I will** immediately inform my direct supervisor and the HFHA Safeguarding Officer, of any imminent harm to a project participant, volunteer, partner or colleague so that the proper support and care can be delivered.
- ☐ **I will** cooperate with any internal or external investigation.
- ☐ **I will** maintain confidentiality and abstain from sharing information related to a reported concern or investigation to which I may be privy.
- ☒ **I will not** ignore any signs of imminent harm, abuse or danger to a project participant, volunteer, partner or colleague.
- ☒ **I will not** coach or otherwise coordinate stories with investigation witnesses.
- ☒ **I will not** retaliate, treat poorly, or engage in harassment towards anyone who is or is suspected to be involved in a safeguarding investigation – whether a complainant, witness, or respondent.
- ☒ **I will not** withhold any information during an investigation.

**I acknowledge that I have read and reviewed the safeguarding behavioral commitments and agree that I will follow them.**

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Signature

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Date received

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Name (typed or printed)



## Appendix C: Policy Acknowledgment Form for National Organizations and Branches — Child and Adult Safeguarding Policy

Entity name: \_\_\_\_\_

Country: \_\_\_\_\_

### Instructions

1. The policy acknowledgment form must be read and signed by the entity's CEO, CFO or designee. If the entity is able to comply with or meet the intent of the policy, then a copy of the policy acknowledgment form must be forwarded to the appropriate area office. The entity should maintain the original form for documentation purposes. If the entity is not able to comply with or meet the intent of the policy, an exception must be requested. The exception request must be documented below and include: a) the section of the policy for which the exception is being requested, b) references to any local laws or business justifications, and c) the proposed alternative. The original of the policy acknowledgment form must be sent to the appropriate area office for review and agreement. The area office will send the original form to HFHI Internal Audit and Legal departments for final approval. The completed/approved form will be returned to the appropriate area office and the originating entity, HFHI Internal Audit, HFHI Legal department, and the area office. The entity must keep copies of the approved exception.

I hereby certify that I have read the attached policy and therefore:

- ☐ I acknowledge and confirm that the attached policy has been adopted in substance by this organisation.
- ☐ I acknowledge and confirm that the attached policy has been adopted in substance by this organisation, except for the specific paragraph(s) noted below.

### Entity acknowledgment:

\_\_\_\_\_  
Entity [CEO or national director as applicable] (print name)

\_\_\_\_\_  
Entity CFO (Print Name)

\_\_\_\_\_  
Entity [CEO or national director as applicable] (signature)

\_\_\_\_\_  
Entity CFO (Signature)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date

**For exceptions:** Note policy section number and text for which the exception is being requested, justification for the exception, and proposed alternative:

Name (print or type):		Department:
Signature:	Full phone number:	Date:
Recommend approval: <i>(area office officials must ensure sufficient detail is provided by the national office to support recommendation)</i>		

### HFHI Legal department approval:

Name (print or type):		Department:
Signature:	Full phone number:	Date:

## Appendix D: Representatives Requirements Matrix

HFHA has significant variation in the level of exposure different Representatives have with children and other vulnerable community members. The following matrix is based on a risk assessment of typical contact levels of different personnel types to guide application of different requirements as regards recruitment and training.

### Definitions:

- **Personnel** includes employees, contractors, consultants, interns, National Office Volunteers and board/committee members.
- **Personnel with possible direct contact with children or vulnerable community members** include: staff (permanent or casual), consultants and regular volunteers travelling overseas, or participating in site-based program activities in Australia. Includes Habitat Women trainees and casual employees.
- **Global Village volunteers** – participating under supervision in on-site program activities overseas, generally for 5 days in duration
- **Corporate Volunteers** – volunteering under supervision in on-site program activities booked by their employer, usually limited to one day
- **Community Volunteers** – volunteering under supervision in on-site program activities in Australia, generally on multiple occasions
- **Re-Store Volunteers** – volunteering in ReStore shops
- **Suppliers and Contractors** include companies paid to deliver services where there is direct interaction with community participants (eg builders, training providers) or who have access to sensitive information related to project participants (eg CRM/data companies)



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	Safeguarding obligations included in Position Description/Contract	Safeguarding question included in interview/screening	Reference checks x 2	Safeguarding reference check questions	Criminal History Record Checks	Working with Children Check	Read Safeguarding Policy and sign Code of Conduct	Volunteer Code of Conduct	Safeguarding online training	Required to read employee handbook including safeguarding-related policies	WHS online training that includes safeguarding, and onsite verbal induction	Briefing and manuals that cover safety, security and expected behaviour; Onsite verbal induction
Personnel that may have direct contact with children or vulnerable community members												
Personnel – no unsupervised contact with children or program communities												
Short-term personnel (less than 10 working days), no direct contact with children/community												
Global Village volunteers over 18												
Global village volunteers under 18												
Corporate and ReStore volunteers												
Community volunteers						*						
Suppliers and Contractors												

\* HFHA will trial working with children checks for community volunteers one year from June 2025 to assess compliance burden and impact on volunteer numbers vs risk mitigation.