

CHILD AND VULNERABLE ADULT SAFEGUARDING POLICY

Approved By:	Transform Global Ltd Board	Effective Date:	26 March 2026
Policy Owner	CEO	Policy Delegate:	Country Director
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1. PURPOSE

Transform Global Ltd is committed to the safety, dignity, and wellbeing of all children and vulnerable adults involved in its programs in Cambodia. Transform has zero tolerance for child abuse, exploitation, or harm of any kind. This policy sets out the organisation's commitment to child safeguarding and establishes clear expectations for behaviour, reporting, and accountability.

The purpose of this policy is to:

- Protect children and vulnerable adults from all forms of abuse, exploitation, and neglect.
- Ensure child and vulnerable adult safety is embedded in governance, leadership, and operations.
- Meet Australian regulatory expectations and relevant Cambodian legal requirements.
- Apply safeguarding protections to all children, including visiting international children, regardless of nationality.

2. SCOPE

This policy applies to all children engaged through Transform programs, activities, and services in Cambodia.

This policy applies to all people associated with Transform, including:

- Cambodian staff, volunteers, drivers, hosts, and partners who interact with visiting children.
- Board members.
- Employees in Australia and Cambodia.
- Volunteers and sponsors.
- Visitors.
- Contractors and consultants.
- Any other person acting on behalf of Transform.

The policy applies across all environments, including:

- Activities involving visiting international children, including school groups.
- Transform centres and facilities.
- Community, outreach, and home-based activities.
- Travel, excursions, and events.
- Online and digital environments.

3. DEFINITIONS

Child: Any person under the age of 18 years, including visiting international children regardless of nationality.

Child abuse and exploitation: Any act or omission that harms, exploits, or endangers a child. This includes physical, sexual, emotional, and psychological abuse, neglect, and exploitation.

Physical abuse: The use of physical force that results in injury or harm to a child.

Sexual abuse: Any sexual activity involving a child, including grooming, exposure to sexual material, inappropriate touching, or sexual exploitation.

Emotional or psychological abuse: Behaviour that harms a child's emotional wellbeing or sense of self-worth.

Neglect: The failure to provide for a child's basic physical, emotional, educational, or medical needs.

Grooming: Behaviour intended to establish trust with a child or their family for the purpose of exploitation or abuse.

Vulnerable adult: A person aged 18 years or over who is unable to protect themselves from harm due to disability, illness, trauma, poverty, dependency, or power imbalance.

Safeguarding: The responsibility to protect children and vulnerable adults from harm and to promote their wellbeing.

4. SAFEGUARDING PRINCIPLES

Transform is guided by the following principles:

- The best interests of the child are paramount.

- Children have the right to be safe, heard, and respected.
- Power imbalances are recognised and actively managed.
- Safeguarding risks are identified, reduced, and monitored.
- All concerns and allegations are taken seriously and acted on promptly.

5. ROLES AND RESPONSIBILITIES

Board of Directors:

- Approves this policy and any amendments.
- Maintains oversight of child safeguarding risks.
- Receives reporting on serious safeguarding incidents and responses.

Chief Executive Officer:

- Joint Safeguarding Lead.
- Accountable for organisational safeguarding systems and compliance.
- Ensures appropriate resources, training, and oversight are in place.

Country Director Cambodia:

- Joint Safeguarding Lead.
- First point of escalation for serious safeguarding incidents occurring in Cambodia.
- Manages local response, reporting, and liaison with Cambodian authorities.

Managers and leaders:

- Promote a child safe culture.
- Ensure staff, volunteers, and visitors understand and comply with this policy.
- Act immediately on safeguarding concerns.

All staff, volunteers, sponsors, and visitors:

- Comply with this policy and all safeguarding codes of conduct.
- Report any safeguarding concerns immediately.
- Participate in required training and awareness activities.

6. CODES OF CONDUCT

All adults associated with Transform must comply with the Safeguarding Code of Conduct. This includes safeguarding responsibilities owed by Cambodian adults toward visiting international children.

Visitors and sponsors must comply with a separate Visitor Safeguarding Code, which sits under this policy.

Codes of conduct prohibit, at a minimum:

- Any form of sexual, exploitative, or abusive behaviour.
- Inappropriate physical contact.
- Being alone with a child without authorisation.
- Unapproved photography, filming, or online communication with children.
- Giving gifts, money, or promises to children or their families without approval.

7. RECRUITMENT AND SCREENING

Transform embeds child safeguarding into recruitment and engagement processes.

Measures include:

- Role-appropriate screening and referee checks.
- Police checks and working with children checks where applicable.
- Visitor screening proportional to access and duration.
- No unsupervised access to children without approval.

8. TRAINING AND AWARENESS

Transform provides safeguarding training to ensure understanding and compliance.

This includes:

- Mandatory safeguarding training for staff.
- Regular refresher training.
- Clear induction for volunteers, sponsors, and visitors.
- Child-friendly education to help children understand their rights and how to raise concerns.

9. REPORTING AND RESPONSE

All safeguarding concerns, suspicions, or allegations must be reported immediately.

Reporting requirements:

- Incidents in Cambodia are reported to the Country Director first.
- Serious incidents are escalated to the CEO without delay.
- Reports may be made internally and to external authorities as required.

Transform will report to relevant Cambodian authorities and Australian authorities where legally required.

No person will suffer retaliation or adverse treatment for raising a safeguarding concern in good faith.

10. INCIDENT MANAGEMENT

Transform will respond to safeguarding incidents promptly and appropriately.

Key requirements:

- The safety and wellbeing of the child is the first priority.
- Alleged perpetrators are removed from contact with children during investigation.
- Confidentiality is maintained.
- Procedural fairness is observed.
- Appropriate support is provided to affected children and others.

Detailed processes are set out in the Safeguarding Incident Reporting and Response Procedure.

11. RECORD KEEPING AND CONFIDENTIALITY

Safeguarding records are:

- Accurate, factual, and timely.
- Stored securely with restricted access.
- Retained in line with legal and organisational requirements.

Information is shared only on a need-to-know basis.

12. MONITORING AND CONTINUOUS IMPROVEMENT

Transform monitors safeguarding practices through:

- Regular risk reviews.
- Incident analysis.
- Feedback from children, staff, and stakeholders.

Learnings are used to improve safeguarding systems and culture.

13. POLICY REVIEW

This policy is reviewed every three years, or earlier if required by:

- Changes in law.
- Serious safeguarding incidents.
- Organisational or operational changes.

All changes require Board approval.

END

VERSION CONTROL

Original Version:	1.0	Version Date:	26 March 2026
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