

SAFEGUARDING CODE OF CONDUCT

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

This Safeguarding Code of Conduct sets out the minimum behavioural standards required to protect children and vulnerable adults from harm. It supports the Child and Vulnerable Adult Safeguarding Policy and applies to all people who work for, represent, or engage with Transform Global Ltd.

The purpose of this Code is to:

- Define acceptable and unacceptable behaviour.
- Prevent abuse, exploitation, and harm.
- Clarify individual responsibility for safeguarding.
- Support a safe and respectful environment.

2. SCOPE

This Code applies to:

- Board members.
- Employees in Australia and Cambodia.
- Volunteers and sponsors.
- Contractors and consultants.
- Visitors who have ongoing or supervised contact with children or vulnerable adults.
- Any person acting on behalf of Transform.

This Code applies in all settings, including:

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

3. GUIDING PRINCIPLES

All people covered by this Code must:

- Act in the best interests of children and vulnerable adults.
- Treat all people with dignity and respect.
- Maintain appropriate professional boundaries.
- Use their position responsibly and avoid misuse of power.
- Take responsibility for safeguarding and reporting concerns.

4. EXPECTED BEHAVIOUR

You must:

- Treat all children and vulnerable adults with respect, patience, and fairness.
- Maintain clear professional boundaries at all times.
- Ensure interactions are visible and, where possible, in group settings.
- Follow all safeguarding policies, procedures, and instructions.
- Obtain appropriate consent before activities, transport, or photography.
- Use appropriate language and behaviour at all times.
- Immediately report safeguarding concerns, suspicions, or allegations.

Cambodian staff, volunteers, drivers, hosts, and partners have a duty of care toward all children, including visiting international children, and must actively safeguard them at all times.

5. UNACCEPTABLE BEHAVIOUR

You must not:

- Engage in any form of sexual, exploitative, or abusive behaviour.
- Use physical punishment or threatening behaviour.
- Engage in inappropriate physical contact.
- Be alone with a child or vulnerable adult without authorisation or visibility.
- Form inappropriate relationships or favouritism.
- Communicate privately with children through personal phones, social media, or online platforms without approval.
- Take, share, or store images or videos of children without approval.
- Give gifts, money, food, or promises to children without authorisation.

- Consume, bring or use alcohol, drugs or substances into any Transform centre, meeting, place of work or activity in Cambodia where Cambodian staff, families or children may be present.
- Ignore, minimise, or fail to report safeguarding concerns.

6. USE OF PHYSICAL CONTACT

Any physical contact must:

- Be appropriate, minimal, and related to the child's or vulnerable adult's needs.
- Be culturally appropriate and respectful.
- Occur in open or observable settings.
- Never involve private areas of the body.

If unsure, do not engage in physical contact.

7. PHOTOGRAPHY, MEDIA AND ONLINE CONDUCT

You must:

- Obtain approval before taking photographs or videos.
- Ensure images respect dignity and privacy.
- Never share images or videos on personal devices or social media unless express permission is given by Transform Cambodia and the people in the images or videos.
- Follow Transform's media and privacy requirements.

8. REPORTING OBLIGATIONS

You must report immediately if you:

- Witness abuse or exploitation.
- Receive a disclosure.
- Suspect inappropriate behaviour.
- Observe a breach of this Code.

Reports must follow the Safeguarding Incident Reporting and Response Procedure.

Failure to report is a breach of this Code.

9. BREACH OF THIS CODE

Breaches of this Code may result in:

- Disciplinary action.
- Removal from duties.
- Termination of employment or engagement.
- Termination of your visit to Transform Cambodia.
- Referral to authorities where required.

Serious breaches may result in immediate suspension.

10. ACKNOWLEDGEMENT

All people covered by this Code must:

- Read and understand this Code.
- Agree to comply with its requirements.
- Acknowledge their obligations as part of engagement or induction.

11. CODE OF CONDUCT REVIEW

This Code of Conduct 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.

Approved by the Board of Transform Global Ltd

END

VERSION CONTROL

Original Version:	1.0	Version Date:	26 March 2026
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