

APMT Fiji — Child Protection & PSEAH Policy

(Aligned to ISO 21001:2018 Educational Organizations Management Systems and ISO 9001:2015 Quality Management Systems)

Document ID: APMT-POL-CP-PSEAH-001

Version: 1.0

Applies to: All APMT Fiji (APMT) personnel (employees, trainers/assessors, casuals, volunteers), directors, contractors, agents, placement hosts, partner schools, and sub-grantees.

Approved by: CEO

Effective date: 01 Jan 2025

Next review: 12 months

Jurisdictional references (Fiji & relevant AU cross-border)

- Fiji Child Care and Protection Act 2024 (Act No. 19 of 2024) — definitions, care/protection duties, child = under 18. parliament.gov.fj
- Fiji Child Welfare Act/Decree 2010 — *mandatory reporting* obligations for specified professionals. laws.gov.fj+2paccli.org+2
- Fiji Crimes Act 2009 — sexual offences incl. rape, indecent assault, defilement of children, abduction of minors. laws.gov.fj+1
- Fiji Domestic Violence Act/Decree 2009 — restraining orders, police duties, protections for children. laws.gov.fj+2paccli.org+2
- Fiji Online Safety Act 2018 — harmful online content; currently under review by government/OSC. laws.gov.fj+1
- Employment Relations Act 2007 (Part 10: Children) — employment of children; govt is consulting on age changes. laws.gov.fj+1
- NSW cross-border (when applicable): Child Protection (Working with Children) Act 2012 (NSW) — WWCC clearances for child-related work; use when APMT personnel engage in NSW. [NSW Legislation+1](http://NSWLegislation+1)

1) Purpose and Scope

APMT is committed to safeguarding all children and young people we interact with through our education and training activities. This policy establishes mandatory requirements to prevent, detect, respond to, and remediate risks of child abuse and PSEAH (Prevention of Sexual Exploitation, Abuse, and Harassment) in all programs, including those delivered in schools and with minors present on APMT premises or at work-based learning sites.

This policy forms part of APMT's Integrated Management System (IMS) and is embedded via risk-based planning, competence and awareness, control of externally provided processes, documented information, performance evaluation, and continual improvement (ISO 21001 & ISO 9001).

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2) Definitions

- Child/Young person: Any person under 18 years of age.
- Child abuse: Physical, emotional/psychological, sexual abuse, neglect, grooming, online exploitation.
- PSEAH: Sexual exploitation, abuse, or harassment of any person, with heightened safeguards for children and vulnerable persons; includes sexual activity with minors, transactional sex, and quid-pro-quo arrangements.
- Safeguarding: Proactive measures to protect children from harm arising from APMT activities or associated persons.
- Downstream parties: Subcontractors, partner schools, agents, and sub-grantees engaged by APMT.

3) Policy Statement

1. Zero tolerance: APMT prohibits child abuse, exploitation, harassment, and grooming in any form, on- or off-duty, in person or online.
2. Do no harm: All activities shall be designed and delivered to minimize safeguarding risks and protect the best interests of the child.
3. Mandatory reporting: Concerns shall be reported immediately through internal channels and to authorities as required by applicable law.
4. Survivor-centred response: Safety, dignity, confidentiality, and informed consent are paramount; retaliation is prohibited.
5. No sexual activity with minors: Strictly prohibited regardless of local consent laws.
6. No transactional sex: Strictly prohibited in connection with APMT activities.
7. Partner compliance: All downstream parties shall comply with this policy through contract clauses, due diligence, training, and monitoring.

4) Roles & Responsibilities

- Board/CEO: Approve policy; allocate resources; ensure independence of investigations.
- Child Safeguarding Officer (CSO): Policy owner; maintains risk register, incident log, referral pathways, and training; coordinates investigations with HR/Integrity & Compliance Officer (ICO).
- Managers/Campus Leads: Ensure local implementation, supervision arrangements, facility controls, and partner compliance.
- All Personnel & Downstream Parties: Complete training; follow the Code of Conduct and Behavioural Standards; report concerns immediately.
- Partner Schools/Hosts: Nominate a safeguarding focal point; align school procedures with this policy via MOU/SLA.

5) Safer Recruitment & Vetting

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APMT shall implement the following before any contact with children:

- Identity & suitability checks: 100-point photo ID, Police Clearance/Criminal History, and where applicable Working With Children or equivalent checks; verified and recorded on personnel files.
- References: Minimum two professional referees from the past five (5) years, including questions on suitability to work with children.
- Role design: Position descriptions identify safeguarding responsibilities; high-risk roles require additional screening and probation oversight.
- Induction: Mandatory safeguarding & PSEAH induction within 30 days; acknowledgement of APMT Code of Conduct and Behaviour with Children Standards.

6) Behaviour with Children — Minimum Standards

All APMT personnel and downstream parties shall:

- Maintain clear professional boundaries; never be alone 1-to-1 behind closed doors with a child; keep doors open or use rooms with visibility panels.
- Use two-adult or line-of-sight supervision wherever practicable.
- Avoid physical contact unless necessary for safety or pedagogy and only with consent, appropriate to age, culture, and task; document any incident where contact was required.
- Never develop relationships that could be perceived as grooming (gifts, special treatment, secret communications).
- Prohibit corporal punishment, humiliating treatment, or degrading language.
- Online conduct: use official channels; no private messaging with minors; no “friending/following” minors on personal social media; no sharing of personal contact details.
- Photography/Media: obtain written informed consent from parent/guardian and the school; follow approved shot lists; no identifying details (name badges, addresses) in public posts; secure storage of images.
- Transport/Excursions: follow approved plans, ratios, and registers; no transporting a child alone in a private vehicle.

(Detailed Behaviour Standards are provided in Annex A and must be signed at induction.)

7) Program & School Safeguards

- Risk assessments: Each activity involving minors shall complete a Child-Safety Risk Assessment (Annex B) covering venue, supervision ratios, toilets/change-rooms, equipment, emergency plans, accessibility, and cultural considerations.
- Supervision ratios: As agreed with the school and compliant with local norms (e.g., minimum 1:15 classroom; 1:10 off-site; higher ratios for practical/vocational workshops).
- Facilities: Sightlines maintained; restricted access to hazardous areas; gender-appropriate toilets and change facilities.

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- Third-party sites: Due diligence of host venues/employers; safeguarding induction for supervisors; clear escalation contacts.
- Curriculum controls: Sensitive content (e.g., case studies, images) pre-screened; opt-out provisions for parents/guardians where appropriate.

8) Reporting & Response (Child Protection and PSEAH)

8.1 Reporting Channels

- Immediate safety first. For imminent danger, contact emergency services, then CSO.
- Report concerns to: line manager, CSO, ICO, or via confidential email/hotline listed on the intranet and partner school noticeboards. Anonymous reports accepted where lawful.

8.2 What to Report

- Any suspicion, disclosure, or allegation of abuse/exploitation/harassment; boundary violations; grooming; unsafe environments; policy breaches by staff, volunteers, partners, or other children.

8.3 Handling a Disclosure

- Listen; avoid leading questions; reassure; do not promise secrecy; record facts promptly using Incident Report Form (Annex C); escalate within 24 hours.

8.4 Investigation & Case Management

- CSO logs the case, conducts initial triage within 24 hours, and convenes an impartial investigator (with HR/ICO).
- Mandatory external reporting to child protection authorities/police/regulators per applicable law and MOU with the school.
- Survivor-centred measures: safety planning, access to medical/psychosocial support, confidentiality safeguards, and protection from retaliation.
- Outcomes recorded; corrective and preventive actions raised in CAPA register; effectiveness verified.

8.5 Consequences

- Breaches may result in removal from child-related work, disciplinary action up to dismissal, contract termination, debarment of suppliers/agents, and reporting to authorities. Payment may be suspended pending outcome.

9) PSEAH-Specific Prohibitions

APMT personnel and downstream parties shall not:

- Engage in sexual activity with any person under 18.
- Exchange money, employment, goods, grades, or services for sex (“transactional sex”).
- Engage in sexual relations with program participants where power imbalance exists.

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- Possess or create sexualised material involving minors; any suspected material must be reported immediately.

10) Digital Safety & Data Protection

- Use APMT platforms for all learner communications; MFA required; least-privilege access.
- No storage of child images/data on personal devices; approved encrypted storage only; retention per Records Control Procedure.
- Obtain parental/guardian consent for data processing and media use; honour withdrawal of consent promptly.

1) Partners, Contractors, and Sub-Grantees

- Pre-award due diligence including sanctions screening, safeguarding capability, reference/adverse-media checks.
- Contractual clauses: adoption of APMT standards, mandatory reporting, audit rights, staff vetting, training, and immediate notification of incidents.
- Kick-off briefing: alignment of school/partner procedures; designate focal points and escalation matrix.
- Monitoring: spot checks, interviews with learners, document sampling; annual attestation of compliance.
- Remedies: corrective action plans, suspension of work or payments, termination for breach, debarment.

12) Training, Awareness & Culture

- Mandatory induction and annual refresher on Child Protection & PSEAH for all personnel; enhanced modules for high-risk roles (trainers, assessors, placement supervisors, recruiters).
- School-specific briefings before each engagement covering site rules, supervision, and reporting contacts.
- Visual reminders (posters, wallet cards) with reporting channels displayed in classrooms/workshops.

13) Risk, Monitoring, and Continual Improvement

- Risk register includes safeguarding and PSEAH risks with owners and treatments; reviewed quarterly.
- KPIs: induction/refresher completion rates, percentage of vetted staff, time-to-triage (<24h), case closure time, CAPA effectiveness, partner attestation coverage, supervision audit scores.
- Internal audits: at least annually, with unannounced spot checks in high-risk settings.
- Management Review: includes safeguarding performance, trends, stakeholder feedback, lessons learned; actions tracked to closure.

14) Interaction with Other APMT Policies

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- Code of Conduct (APMT-CODE-001)
- Integrity, Anti-Fraud, Bribery & Corruption (APMT-POL-IFC-001)
- HR & Recruitment (APMT-HR-001)
- Procurement (APMT-PROC-001)
- Complaints & Appeals; Academic Integrity; Records Control; WHS; Sanctions/ATF Screening

15) Documented Information & Records

- Vetting results, consents, risk assessments, attendance registers, incident reports, investigation files, CAPAs, training completion, and partner attestations shall be controlled, retained, and securely stored per PR-REC-01 Records Control Procedure.

16) Acknowledgement

All personnel, contractors, and relevant partner staff shall sign an acknowledgement of this policy and the Behaviour with Children Standards prior to any child-related work.

Document Control

- Owner: Child Safeguarding Officer
- Change history: v1.0 – Initial issue integrating child protection and PSEAH into APMT IMS (ISO 21001/ISO 9001).

Annexes (templates to issue with the policy)

- Annex A: Behaviour with Children Standards (sign-off form)
- Annex B: Child-Safety Risk Assessment & Supervision Plan (includes ratios and site checklist)
- Annex C: Incident/Concern Reporting Form & 24-hour Escalation Matrix
- Annex D: Media/Photography Consent Form (parent/guardian & school)
- Annex E: School/Partner Safeguarding Agreement (flow-down clauses)
- Annex F: Transport & Excursion Safeguards (movement logs, emergency contacts)
- Annex G: Digital Safety & Communications Protocol (approved channels, retention)

1) Emergency & reporting contacts (Fiji)

- National emergency: 911 (general), Police: 917, Fire: 910, Crime Stoppers: 919. taf.org.fj
- Ministry of Women, Children & Social Protection (reporting/liaison): +679 331 5585 • mwcsp@mwcsp.gov.fj • Level 1, Naibati House, Goodenough St, Suva. mwcsp.gov.fj
- ODPF Sexual Crimes Division (police liaison on child/sexual offences). odpp.com.fj

These contacts are embedded into the Incident Form (Annex C) and the 24-hour escalation matrix.

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2) Safer recruitment & vetting (confirmed)

- Before any child contact: 100-point photo ID; criminal history/Police Clearance; school-required vetting; role-appropriate Working with Children/equivalents for Australia or other jurisdictions; two recent professional references probing child-suitability. (Cross-ref HR policy already issued.)

3) Behaviour with Children — Standards (unchanged core; now jurisdiction-aware)

- Two-adult/line-of-sight wherever practicable; no 1:1 behind closed doors.
- Online boundaries; media consent; transport/excursions controls; no transactional sex; no sexual acts with minors (zero tolerance).
- Immediate reporting to CSO and authorities per Fiji law (CWA 2010, Child Care & Protection Act 2024). laws.gov.fj+1

4) Default APMT supervision ratios (school settings)

Use these minimum standards unless the host school mandates stricter ratios or a specific law applies.

- Classroom theory (Years 7–13 / ages ~12–18): 1 adult : 15 students (1:15).
- Workshops/labs (hospitality kitchens, automotive bays, hair/beauty): 1:10 active stations; add a roaming safety marshal for heat/sharp/mechanical hazards (1 additional per 20 learners).
- Off-site visits/excursions: 1:10; water or traffic-adjacent sites 1:8; high-risk venues 1:6 with pre-approved risk plan.
- Mixed-gender overnight programs (rare for APMT): separate sleeping quarters and at least one adult of each gender; min 1:8.

Ratios are justified via ISO 21001 risk-based planning and align to international practice; schools may impose tighter ratios in their policy. Document any variance in Annex B.

5) Reporting & case management (timebound)

- Immediate danger: call 911/917; then notify CSO. taf.org.fj
- Internal triage: within 24 hours by CSO; authority notifications per law; survivor-centred measures; CAPA raised and verified.

6) Partners & contractors (flow-down)

- Contracts include safeguarding clauses; due diligence covers sanctions screening, capacity, adverse media, references; onboarding brief; annual attestation and spot checks (as already defined in your IMS). (Links to Procurement policy issued earlier.)

Annex Pack — Ready-to-use Templates (copy/paste into Word)

Annex A — Behaviour with Children Standards (Sign-off)

I, _____, acknowledge and will comply with APMT Child Protection & PSEAH Behaviour Standards:

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1. Maintain professional boundaries; avoid 1:1 closed-door settings; two-adult rule where practicable.
2. No grooming, gifts, or private communications with minors.
3. Only necessary, appropriate physical contact with consent; record any incident.
4. Use approved channels for online communications; no personal social media contact with minors.
5. Media only with written parental/guardian & school consent; secure storage; no identifying details public.
6. Follow supervision ratios and site rules; stop unsafe work.
7. Report any concern within 24 hours.

Name / Role / Signature / Date • Manager (signature/date)

Annex B — Child-Safety Risk Assessment & Supervision Plan

Activity/Program: ___ School/Venue: ___ Dates: ___

APMT Lead: ___ School Focal Point: ___ CSO Notified (Y/N): ___

1. Participants

Age range: ___ Estimated # learners: ___ Special needs/adjustments: ___

2. Hazards & Controls (tick + describe)

- ☐ Venue hazards (kitchen/heat/sharps/mechanical/traffic/water) → Controls: PPE, guarding, safety marshal, capacity limits.
- ☐ Supervision & ratios → Planned ratio: ___ (min per policy); staffing roster attached.
- ☐ Toilets/change-rooms → Separate, sign-posted, supervised transitions.
- ☐ Transport → Licensed provider, registers, headcounts, emergency contacts.
- ☐ Digital/photography → Consents on file; restricted storage; no personal devices.
- ☐ Medical/emergency → First-aid, incident plan, nearest hospital, emergency numbers (911/917/910). taf.org.fj

3. Approvals

APMT Manager: ___ School Approval: ___ Date: ___

Annex C — Incident/Concern Report & 24-Hour Escalation

Reporter: ___ Role: ___ Contact: ___ Date/Time: ___

Child(ren) involved: ___ Location: ___

What happened (facts only):

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Immediate actions taken (safety first):

Escalation (tick & timestamp):

- ☐ Police (917) • ☐ 911 Emergency • ☐ School focal point • ☐ CSO • ☐ ODPP SCD • ☐ Ministry
WCS Protection (+679 331 5585 / mwcsp@mwcsp.gov.fj)

Next steps / referrals / support provided: ____

Signatures: Reporter ____ • CSO ____ • Manager ____

Annex D — Media/Photography Consent (Parent/Guardian & School)

Learner: ____ School/Class: ____

I consent to APMT capturing and using images/video for [educational records / internal reports / public marketing]*.

- Retention: [x years]; Storage: secure server; Right to withdraw at any time.
Parent/Guardian: Name/Signature/Date
School Authorised Officer: Name/Signature/Date
(*Strike out any category not approved by school.)

Annex E — School/Partner Safeguarding Agreement (Flow-down Clauses)

The Partner School agrees to:

1. Nominate a safeguarding focal point and ensure staff complete APMT's induction.
2. Maintain supervision ratios at or above APMT minimums or school's stricter policy.
3. Enforce Behaviour Standards; enable site access for audits/spot checks.
4. Report any allegation concerning APMT personnel within 24 hours to APMT CSO and authorities as required by Fiji law. laws.gov.fj+1
5. Permit termination/suspension for safeguarding non-compliance.

Signatures: Partner ____ • APMT ____ • Date ____

Annex F — Transport & Excursion Controls

- Pre-approved route and timetable; licensed transport; seatbelts; attendance registers at every movement; headcounts at boarding/alighting; minimum 1:10 ratio (1:8 near water/traffic).
- Emergency pack: first-aid kit, contact list, incident forms, 911/917/910 numbers. taf.org.fj

Annex G — Digital Safety & Communications Protocol

- Use APMT email/LMS only; MFA; role-based access; no personal clouds/devices for child data.
- Image/data retention per Records Procedure; delete on consent withdrawal.
- Report harmful online content pathways under Fiji Online Safety Act. laws.gov.fj

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Child Protection & PSEAH

APMT Fiji has zero tolerance for child abuse, exploitation or harassment. All staff and partners are vetted, trained and bound by our Behaviour Standards. Concerns can be reported confidentially to our Child Safeguarding Officer or, in an emergency, call 911 or Police 917 in Fiji. taf.org.fj

Before any child-related activity, confirm vetting is current, complete Annex B risk plan, brief your team on supervision, and ensure the Incident Form (Annex C) is on hand with emergency numbers and local referral contacts.

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