

Fairtrade Australia & New Zealand

Protection Policy for Children and Vulnerable Adults

1. Purpose

Fairtrade Australia and New Zealand (Fairtrade ANZ) is committed to preventing and responding to all forms of abuse, exploitation, and neglect involving children and vulnerable adults. We recognise that some individuals face increased risk due to inequality, discrimination, and unequal access to safety, services, and decision-making.

This Protection Policy sets out Fairtrade ANZ's commitment to safeguarding children and vulnerable adults and outlines the principles, expectations, and procedures that guide our work. It ensures that staff and others acting on behalf of Fairtrade ANZ understand their responsibilities, follow a shared Code of Conduct, and uphold a consistent, survivor-centred, and rights-based approach to protection.

This policy reflects our shared commitment to:

- A zero-tolerance approach to abuse, exploitation, and neglect
- Upholding the rights and dignity of children and vulnerable adults
- Acting with duty of care in all contexts
- Maintaining best practice in organisational safeguarding, including safe reporting, appropriate action, and integration with Fairtrade ANZ's and Fairtrade International's wider accountability and risk management systems

Any questions regarding the application of this policy, concerns about possible breaches or difficulties in complying with the policy must be brought to the attention of Fairtrade ANZ's Safeguarding focal contact psr@fairtrade.org.nz or Fairtrade ANZ Chief Executive Officer, Senthil Nathan senthil@fairtrade.com.au.

2. Related Policies

- Communications Protocol
- Complaints Handling Policy
- Disability Inclusion Policy
- Fairtrade ANZ Code of Conduct
- Fairtrade International Organisational Code
- Fairtrade International Act to Protect Policy
- Gender Equity Policy
- Locally Led Policy
- Modern Slavery Policy
- Partnerships Policy
- Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy
- Whistleblowing Policy

3. Related Legislation

Australia: Criminal Code Act 1995, Modern Slavery Act 2018

New Zealand: Crimes Act 1961, Children's Act 2014

4. Scope

This policy applies to all staff, contractors, volunteers, interns, and Board or Committee members of Fairtrade ANZ, as well as anyone working on behalf of the organisation, including in coordination with Fairtrade International.

It also applies to Fairtrade ANZ's implementing partners and any individual or entity representing the organisation or Fairtrade International in the course of shared work.

This policy applies across all contexts where Fairtrade ANZ operates or engages with others, including in Australia, Aotearoa New Zealand, and internationally, and covers any safeguarding risks related to Fairtrade ANZ's operations, relationships, public activities, or impact — including events, campaigns, or visits where children or vulnerable adults may be present.

5. Definitions

Child: Anyone who has not yet reached their 18th birthday.

Vulnerable adult: A person who is 18 years of age or over, and who is or may be unable to protect themselves against significant abuse, neglect, exploitation (including sexual exploitation) or harassment, and is the one who is impacted most whenever a violation occurs. Vulnerability may arise due to their gender, pregnancy status, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts or any other factors that give rise to such risk.

Abuse: Intentional harm or mistreatment of an individual (child or adult). Abuse can be physical, emotional, or verbal.

Physical Abuse: Acts that cause physical harm, such as hitting, pushing, throwing, suffocating, or otherwise injuring a person.

Emotional Abuse: Persistent emotional ill-treatment of a child or vulnerable adult such as to cause severe and long-lasting effects on emotional development and/or well-being. In the case of children, it may involve conveying to children that they are worthless and unloved, inadequate, or valued only so far as they meet the needs of another person (for example farmers or workers). It can also involve age or developmentally inappropriate expectations being imposed on children or causing children frequently to feel frightened or in danger. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may occur alone.

Neglect: The persistent failure to meet a child's and or vulnerable adult's basic physical, emotional and/or psychological needs, likely to result in the serious impairment of physical or cognitive development and/or functions.

Sexual Abuse: Forcing or enticing a child or adult to take part in sexual activities. The activities may involve physical contact, including penetrative (e.g. rape) or non-penetrative acts. In the case of children, they may also include non-contact activities, such as involving children in looking at, or in the production of, pornographic materials or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Exploitation: The act of taking advantage of someone or a group of people in order to profit from them or otherwise benefit oneself.

Harassment: Unwanted behaviour that offends, humiliates, or intimidates a person, and which a reasonable person would expect to make someone feel offended, humiliated, or intimidated. This includes sexual harassment, which involves unwelcome conduct of a sexual nature.

Grooming: Engaging in predatory conduct in order to prepare a child or vulnerable person for sexual activity. This includes communicating or befriending a child or their guardian in order to be able to establish trust or access.

6. Underpinning Principles

The following principles guide Fairtrade ANZ's approach to protecting children and vulnerable adults.

They underpin all action taken to prevent, identify, and respond to abuse, exploitation, and neglect:

- i. **Zero Tolerance for Harm:** Fairtrade ANZ will not tolerate abuse, exploitation, harassment, or neglect of children or vulnerable adults under any circumstances.
- ii. **Best Interests of the Child and Vulnerable Adult:** In all actions concerning children and vulnerable adults, their best interests are the primary consideration.
- iii. **Rights-Based and Locally Led:** Fairtrade ANZ promotes the rights, dignity, and agency of those most at risk. We work with affected communities and partners to support locally defined and culturally safe approaches to protection.
- iv. **Empowerment and Participation:** Children and vulnerable adults have the right to be heard, participate in decisions affecting them, and help shape the solutions that protect them.
- v. **Do No Harm / No Further Harm:** All safeguarding actions must minimise the risk of further harm. This includes how concerns are reported, investigated, and communicated.
- vi. **Prevention First:** Fairtrade ANZ prioritises preventative action — including safe recruitment, training, risk identification, and protection planning — to reduce the risk of harm before it occurs.
- vii. **Accountability and Transparency:** We hold ourselves and our partners accountable for upholding these principles. Protection concerns must be reported and acted on in a timely, safe, and confidential manner.
- viii. **Equity and Inclusion:** Fairtrade ANZ recognises that protection risks are shaped by gender, disability, age, religion, sexual orientation, ethnicity, and other factors. We are committed to addressing structural inequalities that heighten vulnerability and marginalisation.
- ix. **Safe, Confidential, and Survivor-Centred Reporting:** All concerns must be handled confidentially and with care for the dignity and safety of the individuals involved. Responses will prioritise the needs and preferences of those impacted.
- x. **Collaboration:** Protection is a shared responsibility. We work with national authorities, community-based organisations, Fairtrade International, Australian Department of Foreign Affairs and Trade (DFAT), New Zealand Ministry of Foreign Affairs and Trade (MFAT), and expert service providers to ensure appropriate support, referral, and follow-up.

7. Responsibilities

Safeguarding is everyone's responsibility. All individuals working with or representing Fairtrade ANZ have a duty to uphold this policy and take action to prevent and respond to harm. Safeguarding focuses on prevention and mitigation of harm, while protection involves providing or enabling appropriate remediation when harm occurs.

All staff, board members, contractors, volunteers, and representatives must:

- Comply with this policy and the attached Code of Conduct at all times
- Immediately report any concern, suspicion, or allegation of abuse, exploitation, neglect, harassment, or misconduct involving children or vulnerable adults — even if unsure
- Cooperate fully with any investigation or response action
- Respect confidentiality and only share information as outlined in this policy
- Complete required safeguarding and act to protect inductions and refreshers
- Contribute to a safe, inclusive, and respectful organisational culture
- Take appropriate precautions when interacting with children or vulnerable adults in public and supervised settings such as events, school visits, or campaign activities, ensuring supervision, consent, and safe conduct at all times.
- Avoid any private, unsupervised, or isolated interactions with children or vulnerable adults outside of approved, work-related, and group contexts (including after-hours or social settings).

The Safeguarding Focal Point is responsible for:

- Acting as the first point of contact for all safeguarding and protection matters
- Providing advice and support on how to manage and respond to protection concerns
- Maintaining contact details for local child and vulnerable adult protection agencies for referral

- Escalating serious concerns to the CEO and to Fairtrade International's Act to Protect lead
- Ensuring accurate records are kept in line with data protection requirements
- Reviewing safeguarding performance and risks regularly
- Supporting consistent implementation of this policy across staff and partners

The CEO and Board are responsible for:

- Ensuring overall organisational commitment to safeguarding and protection
- Supporting a culture of safety and accountability
- Ensuring resourcing and oversight for policy implementation
- Supporting escalations and decision-making in serious cases

Fairtrade International supports this policy by:

- Receiving timely protection and safeguarding reports from Fairtrade ANZ regarding any serious concerns, including incidents involving children, vulnerable adults, or supply chain actors
- Providing technical advice and procedural guidance to Fairtrade ANZ staff and Board on safeguarding and protection concerns, policy interpretation, and appropriate next steps
- Guiding escalation and decision-making through the global Fairtrade Act to Protect architecture, including engaging the Fairtrade International Act to Protect Executive Committee when required
- Coordinating cross-system responses in serious or complex cases involving certified producer organisations, traders, or other supply chain partners
- Supporting learning and improvement by facilitating the sharing of lessons learned, actions taken, and systemic risks identified across the Fairtrade system
- Notifying relevant decision-makers of substantiated safeguarding violations that may have implications for recruitment, partnership management, or certification status

8. Safeguarding Focal Point

Fairtrade ANZ has an appointed Safeguarding Focal Point whom can be contacted at psr@fairtrade.org.nz. This is a senior person within the organisation who has the experience and necessary skills and is able to ensure the policy is implemented effectively.

The Safeguarding Focal Point is responsible for:

- Receiving and responding to all protection-related allegations that are reported by staff, contractors, volunteers, or partners
- Providing advice, guidance, and training to staff and representatives to help them understand safeguarding concerns and how to report them appropriately
- Referring concerns to external protection authorities or specialist services where appropriate and safe to do so
- Escalating serious concerns to the Fairtrade ANZ CEO and Chair, the Fairtrade International Senior Manager, Social Protection, and, where applicable, notifying the Australian Department of Foreign Affairs and Trade in line with mandatory incident reporting requirements
- Ensuring accurate, confidential records are maintained in secure, access-controlled files
- Supporting the implementation of this policy through training, guidance, and regular check-ins with the team
- Maintaining an up-to-date list of relevant referral contacts in Australia, Aotearoa New Zealand, and the countries where Fairtrade ANZ operates

9. Safeguarding Code of Conduct

All staff, board members, contractors and representatives of Fairtrade ANZ must uphold the highest standards of behaviour in their work with children and vulnerable adults. The Code of Conduct outlines the behaviours that are expected — and prohibited — to ensure a safe and respectful environment.

All individuals covered by this policy must read and sign this Safeguarding Code of Conduct and the Fairtrade ANZ Code of Conduct as a condition of their engagement.

Expected Behaviour

All Fairtrade ANZ staff, contractors, and representatives must:

- Treat children and vulnerable adults with dignity, respect, and fairness
- Prioritise their safety and wellbeing in all interactions
- Follow Fairtrade ANZ's reporting procedures when concerns arise
- Respect privacy and confidentiality in accordance with this policy
- Comply with relevant legislation, including child protection and labour laws
- Ensure informed and documented consent is obtained before collecting or using any images, recordings, or personal information of children or vulnerable adults

Unacceptable Behaviour

The following behaviours are strictly prohibited:

- Hitting or physically harming a child or vulnerable adult
- Engaging in any form of sexual activity with a child (under 18)
- Engaging in exploitative, coercive, or non-consensual sexual behaviour with any adult
- Developing relationships with children or vulnerable adults that has indications of exploitation or abuse
- Using inappropriate, offensive, or sexually suggestive language or behaviour
- Spending time alone with a child or vulnerable adult in a private or unobservable setting
- Taking photos, videos, or audio recordings of children or vulnerable adults without documented informed consent from the individual and, where relevant, their legal guardian
- Sharing identifying information (e.g. names, location) of children or vulnerable adults in communications without approval and redaction
- Discriminating against or showing favouritism towards a particular individual
- Participating in, facilitating, or failing to report any form of abuse, exploitation, or neglect

Photography and Video Guidelines

To uphold the dignity, privacy, and safety of children and vulnerable adults, all photography, video, and story collection must adhere to the following principles:

- Always seek informed, written consent before capturing or using any image or story involving children or vulnerable adults. Use the Photography Consent Form (see Appendix B), and ensure individuals understand how their image or story will be used.
- Where the subject is a child or someone with impaired decision-making capacity, consent must also be obtained from a legal guardian or caregiver, in line with the Fairtrade International Act to Protect Policy.
- Avoid using real names or specific locations, especially where sharing stories involving sensitive topics such as exploitation, gender-based violence, or poverty.
- Do not depict individuals in ways that could cause harm, reinforce stereotypes, or portray them as passive victims. Imagery should reflect dignity, participation, and agency, consistent with Fairtrade's rights-based and survivor-centred principles.

- Do not take or share photos or videos of individuals in distress, grief, or trauma unless there is clear justification and consent, and the content is handled with utmost sensitivity.
- When working in public or advocacy settings (such as schools, markets, or community events), whether in Australia, Aotearoa New Zealand, or internationally, take extra care to ensure informed consent, appropriate supervision, and safeguarding principles are applied consistently, even if the engagement is brief or informal.
- Always confirm with a designated Fairtrade ANZ staff member before publishing photos, videos, or stories to ensure they meet appropriate safeguarding and communications standards.
- Store all media securely, limit access to authorised personnel, and use it only for the purpose agreed in the consent process. Responsible transparency must be balanced with privacy and protection, particularly when working with individuals at risk.

10. Reporting Process

Fairtrade ANZ is committed to acting swiftly and appropriately when there are concerns about the abuse, exploitation, or neglect of children or vulnerable adults. Any person working with or on behalf of Fairtrade ANZ must report concerns within 48 hours.

What to Report

Concerns may relate to, but are not limited to:

- Child abuse or neglect (physical, emotional, sexual, or psychological)
- Child labour, including the worst forms of child labour; work that is likely to harm the health, safety, or moral development of a child or vulnerable adult; or the recruitment of children into armed conflict.
- Forced or bonded labour, human trafficking, or any situation involving withholding of wages or identity documents, threats, coercion, or intimidation.
- Sexual exploitation, harassment, or grooming of a child or vulnerable adult
- Use of children or vulnerable adults in prostitution, pornography, or illicit activities
- Posting, storing, or using media involving minors without consent
- Statements, behaviour, or observed conditions that raise a reasonable suspicion of abuse or harm

How to Report

- Concerns must be reported immediately to the Safeguarding Focal Point at psr@fairtrade.org.nz
- A Protection Reporting Form (Appendix A) must be completed as soon as possible.
- If someone is in immediate danger, national protection authorities or emergency services should be contacted first.

All concerns will be taken seriously and handled with sensitivity and confidentiality.

Duty to Report

All Fairtrade ANZ staff, contractors, volunteers, and partners have a responsibility to report if they know, suspect, or are made aware of:

- Any incident involving abuse, exploitation, neglect, harassment, or violence against a child or vulnerable adult
- Any breach of this policy or Code of Conduct
- Any disclosure or behaviour suggesting that an individual may be at risk of harm

If in doubt, it is always better to raise a concern than to remain silent.

Malicious or knowingly false reports may result in disciplinary action. However, no adverse action will be taken against anyone who reports in good faith, even if the concern is later found to be unsubstantiated.

- Any breach of this Protection Policy

Escalation and Response

Upon receiving a report, the Safeguarding Focal Point will:

- Conduct an initial assessment and provide support as needed
- Refer the matter to appropriate national protection authorities or specialist services where safe and required
- Escalate serious concerns to the Chair of the Board and to Fairtrade International's Senior Manager for Social Protection
- Where applicable, notify the Australian Department of Foreign Affairs and Trade (DFAT) within 5 working days

Fairtrade International Social Compliance socialcompliance@fairtrade.net will escalate the case further to the Fairtrade International Act to Protect Executive Committee.

A rights-based, survivor-centred approach will guide all decision-making. The safety, dignity, and best interests of the affected child or vulnerable adult will be prioritised. Where removal from harm is required, steps will be taken to ensure this does not result in further risk or distress.

In complex cases, further investigation or engagement with the affected person may be required prior to referral or resolution.

Storage of Information

All protection-related records will be stored securely on Fairtrade ANZ servers, in a folder accessible only to the Safeguarding Focal Point and designated staff. Records must:

- Be written promptly and factually
- Be signed and dated by the reporter and Safeguarding Focal Point
- Be kept separate from general personnel files
- Only be shared on a need-to-know basis, in accordance with data protection and confidentiality protocols.

Communications

All information relating to child and vulnerable adult protection is confidential and considered privileged. Communications about a case — internal or external — must follow strict approval processes.

No individual may disclose safeguarding information to a third party without prior discussion with the Safeguarding Focal Point. Requests for disclosure will be reviewed by the Fairtrade ANZ Safeguarding Focal Point and, where relevant, escalated to Fairtrade International's Senior Manager, Social Protection.

Email and file access must be secured. Password protection is required for all sensitive material. Both senders and receivers of safeguarding information are responsible for ensuring access is limited to authorised parties.

11. Policy Breach

Any breach of this policy may result in disciplinary action, up to and including termination of employment or engagement of services. Where a breach involves suspected criminal activity or serious misconduct, Fairtrade ANZ may also refer the matter to relevant legal or regulatory authorities.

12. Document Control

This Policy is available in the shared Fairtrade ANZ drive for all employees and is available on our website.

A copy of this policy will be provided to any person or organisation on request.

13. Monitoring and Review

This policy will be reviewed every three years, or earlier if there are significant changes to safeguarding legislation, organisational structure, or Fairtrade International policies.

14. For More Information

For more information or assistance, contact us at:

- Australia: info@fairtrade.com.au
- New Zealand: info@fairtrade.org.nz

Board Approval Date	Version	Notes
2015	v. 1	First version approved
30 August 2019	v.2	Updated to reflect Fairtrade International Policy and the Protection Policy against Sexual Exploitation
November 2025	v. 3	• Alignment with the Fairtrade International Act to Protect Policy (2024). • Language updated to be clearer, survivor-centred, and rights-based, with an emphasis on locally led approaches. • Roles and responsibilities, particularly for the safeguarding focal point, expanded and clarified. • Reporting and escalation procedures strengthened, with clear steps, timelines, and confidentiality measures. • References to PSEAH, modern slavery, and locally led action added • Safeguarding code of conduct and photography and video guidelines now embedded rather than appended.

15. Agreement by Fairtrade representative

I, _____, confirm that I have read Fairtrade ANZ's Protection Policy for Children and Vulnerable Adults and its associated Safeguarding Code of Conduct, and I agree to comply.

Signature:

Date:

16. Appendices

A: Protection Reporting Form