Child Protection & Safeguarding Policy — Labour Mobility (including Children Left Behind)

CHILD PROTECTION AND SAFEGUARDING POLICY — LABOUR MOBILITY

BioWize | Version 1.0 | Effective: 07/09/2026 | Next review: 06/09/2027

Approved by: Tony Acubey - Managing Director

1. WHY THIS POLICY EXISTS

BioWize recruits and places adults. But almost every placement we make leaves children behind in Timor-Leste, and those children carry a real share of the cost of labour mobility.

UNICEF's 2024 study "The Impact of Pacific Labour Mobility Schemes on Children Left Behind" (UNICEF, University of the South Pacific and Western Sydney University; Fiji, Samoa, Solomon Islands and Vanuatu) found that children of migrating parents commonly experienced sadness and emotional distress, and in some cases physical illness after a parent left; that long absences weakened the bond with the absent parent, sometimes permanently, and made return harder for everyone; that caregivers left at home — often solo mothers and grandparents — struggled with children's behaviour and discipline; that some households showed serious protection risks, including violence against children, children spending unsupervised time on the streets, adolescent substance use, food insecurity, and neglect or abandonment; and that infrequent contact with the absent parent made all of this worse, while regular contact helped. Children themselves asked, above all, for their parent to call.

Timorese families in the PALM Scheme, the RSE Scheme, the Korean EPS and other programmes face the same pressures. This policy sets out what BioWize does about it, and how we protect every child who comes into contact with our business.

2. SCOPE

This policy applies to all BioWize directors, owners, staff, interns and volunteers; to every sub-agent, broker, recruiter, trainer, driver, medical or training provider and any other party acting on our behalf; and, as a contractual expectation, to the employers and host organisations we place workers with.

It covers children of our workers and candidates ("children left behind"), children in candidates' households, children in the communities where we recruit, children who accompany candidates to our offices, interviews, medicals or events, and children who appear in any photograph, video, record or database we hold.

"Child" means any person under 18 years of age, regardless of local marriage, work or consent practice.

3. OUR COMMITMENTS

- No child is ever recruited, placed, or presented as a candidate by BioWize.
- No child of a worker is left without a competent, identified adult carer as a result of a placement we make.
- Every candidate has a written Family and Care Plan on file before we submit them to a job order.
- Every worker we place is supported to keep regular contact with their children.
- Every welfare check we do asks about the children at home, not only the worker abroad.
- Any concern about a child's safety is acted on within 24 hours and referred to the proper authorities.
- We charge workers no recruitment fees, because worker debt is a direct harm to children.
- Everyone who works for us signs and is trained on this policy, and breach is grounds for dismissal or termination of contract.

4. LEGAL AND STANDARDS FRAMEWORK

- UN Convention on the Rights of the Child (ratified by Timor-Leste in 2003) and its principle that the best interests of the child come first.
- Timor-Leste's law on the protection of children and young people in danger, and the offences of abuse, exploitation, neglect and trafficking under the Penal Code.
- The Timor-Leste Labour Code, including the minimum age for employment.
- ILO Convention No. 138 (Minimum Age), ILO Convention No. 182 (Worst Forms of Child Labour), and the ILO General Principles and Operational Guidelines for Fair Recruitment.
- The rules of the destination scheme that applies to the placement — for example the PALM Scheme Deed and Guidelines (Australia), RSE employer requirements (New Zealand), or EPS requirements (Republic of Korea).
- SEFOPE requirements and the terms of any bilateral labour arrangement under which we operate.

Where standards differ, we apply the highest.

PART A — CHILDREN AND OUR RECRUITMENT

5. NO CHILD RECRUITMENT

5.1 We verify the age of every candidate against at least two documents (electoral card, passport, birth certificate, baptismal record). Where documents conflict or age is uncertain, we treat the person as a child and do not proceed.
5.2 We never assist a candidate to alter, replace or misstate a date of birth, and we report any attempt to do so.
5.3 Any employer, sub-agent or job order that seeks workers under 18 is refused and reported to SEFOPE.

6. CHILD LABOUR AND EMPLOYER DUE DILIGENCE

6.1 Before we place workers with an employer, we check for child labour risk in their operation and supply chain, and we record the check.
6.2 If we learn that an employer uses child labour or has an unresolved child safeguarding failure, we suspend placements immediately and notify the scheme authority.

7. CHILDREN IN OUR OFFICES AND OUR COMMUNICATIONS

7.1 A child is never left alone with a BioWize staff member, sub-agent, driver or trainer. Meetings involving a child are held in open, visible spaces, with the parent or guardian present.
7.2 Children do not attend interviews, medical examinations or testing sessions; where a candidate has no childcare, we arrange a supervised waiting area with two adults present or reschedule.
7.3 We do not publish a child's name, school, address, or any identifying image without the written consent of the parent or guardian, and we never publish a child's image alongside details of a family's migration or finances.
7.4 We do not photograph children in distress, in medical settings, or in any way that could shame or endanger them.

8. NO RECRUITMENT FEES

Recruitment debt pushes families into hardship, forces children out of school and into work, and traps workers in placements they cannot leave. BioWize charges workers and their families no recruitment fee, no placement fee, no "processing" or "training deposit", and no fee through any sub-agent. This is set out in full in our Fees and Worker Protections policy and is enforced as a child-protection measure.

PART B — CHILDREN LEFT BEHIND

9. FAMILY AND CARE PLAN (MANDATORY BEFORE PLACEMENT)

9.1 No candidate with dependent children is submitted to a job order until a written Family and Care Plan is completed with them and filed in their candidate record.
9.2 The plan records: each child's name, age and relationship; the named primary caregiver and their contact number; a named alternate caregiver; the other parent's position and consent where applicable; each child's school, grade and attendance status; health needs, disability or medication; who receives and controls remittances for the children; who may consent to medical treatment in the parent's absence; and an in-country emergency contact for BioWize.
9.3 The plan is reviewed and reconfirmed before departure, and updated at every welfare check.

10. CARE ARRANGEMENTS WE WILL NOT ACCEPT

BioWize will not proceed with a placement where the plan would leave a child:
- with no identified adult carer, or in the care of another child;

- with a carer who is not able to cope — for example, severely ill, frail, or already caring for more children than they can manage;
- with any person known or credibly alleged to have harmed a child, or in a household where violence has been reported;
- without means to stay in school or to receive medical care.

Where a single parent, or both parents, intend to migrate, we require a strengthened plan, a second caregiver interview, and additional pre-departure counselling before we will proceed.

11. PRE-DEPARTURE BRIEFING FOR THE FAMILY

11.1 We brief the worker AND the caregiver together, in Tetun, before departure. The briefing covers, plainly: that children commonly become sad, withdrawn or difficult after a parent leaves; that a long absence can weaken the bond and that return needs to be planned for; that behaviour problems at home are normal and are not the caregiver's failure; and that regular contact is the single most protective thing a migrating parent can do.
11.2 The caregiver receives our contact details, the welfare-check schedule, and instructions on how to raise a concern at any time, free of charge.

12. KEEPING IN CONTACT

12.1 Every worker sets a realistic contact routine before departure — as a minimum, one call per week with their children, and contact on birthdays and at school milestones.
12.2 We ask every employer to confirm in writing that worker accommodation has reliable internet or phone access and that rosters allow calls home at reasonable hours in Timor-Leste.
12.3 We check at each welfare call whether contact is actually happening. Loss of contact for more than one month is treated as a welfare flag and followed up with both the worker and the caregiver.

13. WELFARE CHECKS THAT INCLUDE THE HOUSEHOLD AT HOME

13.1 Schedule for every placement: within two weeks of arrival; at one month; every three months thereafter; and 30 days before return.
13.2 Each round includes a call to the worker and a separate call, in Tetun, to the caregiver at home.
13.3 The caregiver call covers: each child's health; school attendance; the child's mood and behaviour; whether money is arriving and is enough; how the caregiver is coping; contact with the absent parent; and whether anything has happened that worried them.
13.4 Every check is logged in the BioWize welfare register with the date, who was spoken to, and any action taken. Missed or unanswered checks are escalated, not closed.

14. MONEY REACHING THE CHILDREN

14.1 Before departure, every worker completes a short financial briefing and sets up a remittance channel, with a

clear agreement on who receives money for the children and what it must cover, including school costs.
14.2 If remittances stop or the caregiver reports she cannot feed the children or pay school costs, we treat it as a child welfare matter, not a private family matter: we contact the worker, involve the employer's welfare officer where appropriate, and refer the family to social services if needed.

15. EDUCATION

15.1 We record each child's school and grade in the Family and Care Plan and confirm attendance at each welfare check.
15.2 A child out of school for more than two weeks, or a child who has started working instead of studying, triggers immediate follow-up with the caregiver and the worker, and referral to social services where the child does not return to school.

16. RED FLAGS THAT OPEN A CASE

Any of the following opens a documented case, actioned within 24 hours:
- a child is left without an adult carer, or the named caregiver has left, fallen seriously ill, or died;
- violence, abuse, neglect or exploitation is reported or suspected in the household;
- a child has stopped attending school, or is working;
- a child is ill or injured and the family cannot pay for care;
- an adolescent is reported to be using alcohol or drugs, sleeping away from home, or in trouble with the police;
- the caregiver says she cannot manage the children;
- no contact between the worker and their children for more than one month;
- remittances have stopped.

17. EMERGENCIES AT HOME WHILE THE WORKER IS ABROAD

17.1 We contact the worker the same day, and notify the employer's welfare contact.
17.2 We support requests for compassionate leave or early return, and we do not penalise, blacklist or charge a worker who returns for a child emergency.
17.3 We connect the family to the appropriate service — social services, police, health, or a specialist agency — and follow up until the child is safe.

18. RETURN AND REINTEGRATION

18.1 Thirty days before return we brief the worker and the caregiver: children may be distant, angry or shy at first; the caregiver's authority should not be undercut on arrival; rebuilding takes time.
18.2 We call the household one month after return to check how reintegration is going.
18.3 Where a worker plans a further placement, we counsel on the cumulative effect of repeated absence on the same children and require a fresh Family and Care Plan.

PART C — OUR PEOPLE, OUR PROCESS

19. CODE OF CONDUCT

Everyone acting for BioWize must:
- treat every child with respect and act in the child's best interests;
- be visible and accountable when children are present;
- report any concern about a child immediately.

Everyone acting for BioWize must never:
- be alone with a child, or take a child in a vehicle alone;
- hit, humiliate, shout at or physically discipline a child;
- have any sexual contact, relationship or sexualised conversation with a child, whatever the local age of consent or marital status;
- contact a child privately by phone or social media;
- give a child money, gifts, alcohol or drugs, or offer any job, favour or advantage in exchange for anything;
- ask a family to place a child in work, or to withdraw a child from school;
- photograph or record a child without consent.

20. SAFER RECRUITMENT AND TRAINING

20.1 All staff and sub-agents are screened before engagement: identity check, reference checks, safeguarding questions at interview and, where obtainable, a police record certificate.
20.2 Everyone signs this policy and the code of conduct before starting work, is inducted on it within 30 days, and refreshes annually.
20.3 Every sub-agent contract incorporates this policy, requires immediate reporting, and allows termination for breach.

21. REPORTING AND RESPONSE

21.1 Child Safeguarding Focal Point: [name, role, phone, WhatsApp, email]. Deputy: [name, phone].
21.2 Anyone may report — worker, caregiver, child, community member, employer or staff member. Reports may be made in person, by phone, by WhatsApp, or in writing, in Tetun or English, and cost nothing.
21.3 Timeline: report immediately and no later than 24 hours after a concern arises; the focal point records and acts within 24 hours. Where a child is in immediate danger, emergency services are called first.
21.4 External referral: PNTL Vulnerable Persons Unit [number]; national police emergency [number]; Ministry of Social Solidarity and Inclusion social services [contact]; ALFeLa legal aid [contact]; PRADET [contact]. Where the child is abroad with a parent, we notify the employer, the scheme authority and local child protection authorities.
21.5 We do not investigate criminal matters ourselves. We secure the child's safety, record what we were told in the words used, and refer to the authorities.

21.6 Confidentiality is maintained; information is shared only with those who need it to protect the child.
21.7 No worker, candidate, caregiver, child or staff member is penalised for reporting in good faith. Retaliation is itself a disciplinary offence.
21.8 We keep the reporter, and where appropriate the child, informed of what happens next.

22. RECORDS AND CHILDREN'S DATA

22.1 We collect the minimum information about children needed to protect them, keep it in access-controlled files, and retain it for [7] years.
22.2 Children's names, schools, addresses and images are never published, shared with employers beyond what a placement requires, or used in marketing.
22.3 Our Privacy and Data Protection policy applies in full to children's data.

23. GOVERNANCE

23.1 This policy is approved by [name, title] and takes effect on [date].
23.2 It is reviewed every 12 months, and immediately after any serious incident.
23.3 It is published on the BioWize public agency profile, displayed in our office, and given to every candidate, caregiver and employer. It is available in Tetun and English; other translations on request.
23.4 Questions or complaints about this policy: [contact].

ANNEX A — FAMILY AND CARE PLAN CHECKLIST
Children (name, age, relationship) | Primary caregiver + phone | Alternate caregiver + phone | Other parent: position and consent | School, grade, attendance | Health needs, disability, medication | Remittance recipient and purpose | Who may consent to medical treatment | In-country emergency contact | Caregiver briefed (date) | Contact routine agreed | Plan reconfirmed before departure (date)

ANNEX B — EMERGENCY CONTACTS
Police emergency: [ ] | PNTL Vulnerable Persons Unit: [ ] | Ambulance: [ ] | MSSI social services: [ ] | ALFeLa: [ ] | PRADET: [ ] | BioWize Child Safeguarding Focal Point: [ ] | Employer welfare contact (per placement): [ ]

Source informing this policy: UNICEF, University of the South Pacific and Western Sydney University, "The Impact of Pacific Labour Mobility Schemes on Children Left Behind in Fiji, Samoa, Solomon Islands and Vanuatu — An Initial Study", September 2024.