

SERVICE RECIPIENTS

Title: Safeguarding Policy

Policy Statement and Objective

The purpose of the Safeguarding Policy is to guide the practices of Australian Inclusion Group (the Organisation), referenced in its entirety, is to ensure the safety and protection of individuals engaging with the Organisation by preventing physical and/or sexual abuse, fostering a proactive safeguarding culture, outlining risk management strategies, clarifying the responsibilities of all parties in identifying and controlling potential abuse incidents, and providing clear guidance on the actions required in the suspicion of abuse within or outside the Organisation. It also guarantees that all suspected abuse will be reported and thoroughly investigated, supporting a secure and responsive environment for all.

The Organisation is committed to promoting and protecting the interests and safety of children, young adults, vulnerable people and people at risk. We have zero tolerance for any form of physical and /or sexual abuse. Everyone working at the Organisation is responsible for the protection of children, young adults, vulnerable people and people at risk and reporting information about any form of physical and /or sexual abuse.

1. All people, regardless of their age, gender, race, religious beliefs, disability, sexual orientation, or family or social background, have equal rights to protection from abuse, neglect or exploitation.
2. The Organisation commits to promoting and protecting the welfare and human rights of people who interact with, or are affected by, our work - particularly those that may be at risk of abuse, neglect or exploitation.
3. The Organisation has no tolerance for abuse, neglect or exploitation.
4. All staff, volunteers, contractors and third parties of the Organisation share responsibility for protecting everyone from abuse, neglect or exploitation.
5. The Organisation has a process for managing incidents that must be followed when one arises.

Link to National Standard

This policy is linked to Standard 1 and 5 of the National Disability Services Standards, and Core Module 1 of the NDIS Quality Indicators and Practice Standards.

Guiding Principles

This Policy is applicable to all staff, volunteers, board members, and any individuals working under contract with the Organisation, as well as all clients of the Organisation, their families, visitors, partners, and contractors. Non-compliance with this Policy and its associated procedures may lead to disciplinary measures, emphasising the importance of adherence to ensure the safety and well-being of all involved with the Organisation.

Our principles guide our actions and policies, ensuring that we not only respond to incidents of abuse and neglect but also work proactively to prevent them.

The Organisation is committed to upholding the principles of our [Human Rights Policy](#), which underscores the inherent dignity and value of every individual. These values are also reflected in our [Code of Conduct Policy](#) and [Privacy and Confidentiality Policy](#).

The Organisation implements comprehensive measures to safeguard children and vulnerable individuals. These include rigorous recruitment screening with background checks, vigilant behavioural observation, specialised induction training for staff, multiple points of contact for clients, and detailed incident response procedures.

The Organisation enforces strict guidelines for photographing children and vulnerable individuals. This includes obtaining informed consent, ensuring images are used appropriately, and safeguarding privacy. All staff must adhere to these protocols to protect the dignity and rights of individuals. For more details, refer to the full procedure.

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Roles and Responsibilities

Role	Responsibility
Board	<ul style="list-style-type: none"> Protecting all people who interact or are affected by the Organisation. Responsible for detecting and preventing abuse to children, young persons or vulnerable persons. Responsible for ensuring Safeguarding governance, policies and procedures are in place. Responsible for ensuring appropriate and effective internal control systems are in place. Ensuring that the Organisation observes all relevant Safeguarding laws and regulations Ensuring Safeguarding is a standing item at all board meetings.
Chief Executive Officer	<ul style="list-style-type: none"> Dealing with and investigating reports of abuse. Ensuring all staff, volunteers and contractors know relevant laws, organisational policies and procedures, and the organisation's Code of Conduct. Ensuring that all the Organisation staff, volunteers and contractors are aware of their obligation to report suspected abuse of a child, young person or vulnerable person by following these policies and procedures. Ensure that The Organisation has effective and appropriate ways to manage Safeguarding and legal compliance. Ensure that reports to external parties are made where required.
Executives and Managers	<ul style="list-style-type: none"> Promote a culture of safety for children, young persons and vulnerable people. Implement this Policy in their area of responsibility. Assess the risk of abuse to children, young persons and vulnerable people within their area and ensure controls are in place to prevent, detect and respond to incidents. Facilitate the reporting of any suspected abuse, neglect or exploitation. Ensure that there is appropriate Safeguarding training in place for staff.
Relevant officer	<ul style="list-style-type: none"> Be the first point of contact for all safeguarding matters. Help staff, volunteers, contractors and board at The Organisation understand their obligations to protect children, young people and vulnerable people and promote their rights. Receive and escalate complaints, concerns and incidents for appropriate action. Provide updates at board meetings. Work with the board to assess safeguarding risks within the organisation and develop strategies and action plans to minimise the risks. Ensure The Organisation undertakes correct screening of people by following current safeguarding laws and legislation and that appropriate records are maintained.
Staff volunteers and contractors	<ul style="list-style-type: none"> Provide an environment that supports all children, young persons and vulnerable people's emotional and physical safety. Familiarise themselves with The Organisation's policy, procedures, Code of Conduct and relevant laws in relation to Safeguarding protection. Report any reasonable belief or incident that a child, young person or vulnerable person's safety or welfare is at risk to responsible persons in the organisation or authorities (such as the Police and/or the child protection service). Fulfil their obligations as mandatory reporters.

Safe Recruitment and Selection

The Organisation is dedicated to ensuring the safety of children, young adults, and vulnerable people by implementing employment and recruitment practices aimed at reducing the risk of harm from individuals unsuitable for work or contact with them. This commitment requires all employees, volunteers, and contractors to undergo the Organisation's recruitment screening processes before they start their roles. Staff are required to provide and maintain the checks outlined in the [Recruitment, Employment, and Resignation Procedures](#).

Persons appointed to roles that involves working with children, young people and vulnerable people must meet the legal requirements to do so. Applicants are required to submit the following documentation, among other documents stated in the [Recruitment, Employment, and Resignation Procedures](#), prior to starting their role with the organisation and at regular intervals throughout their employment.

Version History Table:

Version	Version Date	Authorised Officer	Amendment Notes	Next Review Date
0.1	24/08/2024	Exec Committee	AIG policy created – to replace the child and vulnerable people policy	NA
1.0	28/08/2024	CEO	Ratified – based on changes above, and Safeguarding insurance requirements	01/09/2026
1.1	20/02/2025	Nikki Ilich	Company banner updated	01/09/2026

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- An approved NDIS Worker Screening Check (NDIS registered), or Police Clearance (non-NDIS registered)
- Working with Children Check
- Answering questions on safeguarding such as “Tell me about your experience with safeguarding” or “When have you been exposed to a situation where you had reasonable grounds to suspect abuse and what did you do”, and
- Proof of any Safeguarding training undertaken.

The Organisation will undertake thorough reference checking before commencement including, at least two (2) references to determine the applicants’ safeguarding experience.

Referees will be asked questions on the applicant’s knowledge and experience on safeguarding and if the referee considers the person suitable to work with children or vulnerable adults.

Reference, [Recruitment, Employment, and Resignation Policy](#), [Recruitment, Employment, and Resignation Procedures](#) and [Equal Employment Opportunity Policy.pdf](#)

Training and Awareness

The Organisation will ensure appropriate Safeguarding training is available to its employees, volunteers, contractors and any relevant persons connected to the organisation who require it.

All staff, volunteers, contractors and third parties must undertake mandatory Safeguarding training during their induction.

For all employees who are working or volunteering with children, young persons or vulnerable persons, this requires, as a minimum, to have awareness that enables them to:

- Understand what Safeguarding is and their role in Safeguarding of children, young persons or vulnerable persons.
- Link safeguarding practices to the Organisation Safeguarding and Incident Reporting policies and procedures.
- Recognise a child, young person or vulnerable person potentially in need of Safeguarding and take action.
- Recognising the indicators of abuse, including grooming behaviours.
- The process of when and how to report:
 - an incident.
 - potential incident.
 - if a child, young person, or vulnerable person’s safety or welfare is at risk. or
 - the requirements and process for mandatory reporting.

The Organisation will ensure staff, volunteers and contractors are trained to recognise, identify, mitigate and respond to risks in the online, offline, onsite and off-site environments. This includes the structural and physical environmental risks and how to communicate that information to children, young persons, vulnerable people and their families.

Reference, [Training and Development Policy](#) and [Training and Development Procedure](#).

Code Of Conduct

The Organisation’s [Code of Conduct](#) applies to all people working with the Organisation including, Board members, paid staff, contractors, and volunteers (collectively referred to as staff members). The [Code of Conduct](#) is to be reviewed, agreed to, and signed by all staff members across the organisation regardless of their role or job description within the Organisation.

This [Code of Conduct](#) sets expectations for how staff members at the Organisation should behave around children, young people and vulnerable people. This is important to help prevent them from being harmed.

The Organisation’s [Code of Conduct](#) identifies positive safe behaviours that we encourage all staff to support. It also identifies behaviours that we consider unacceptable. Engaging in unacceptable behaviour is a breach of the [Code of Conduct](#) and may result in managerial or disciplinary action.

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Managing Safeguarding Risk

The Organisation will ensure that the safety of children, young persons or vulnerable persons is a part of its overall risk management approach.

The Organisation Risk, Governance and Finance Committee is committed to identifying and managing risks at the Organisation. Risk and compliance committee members, including all board members, will receive regular Safeguarding training.

The Organisation will manage the risk of Safeguarding by:

- Having an action plan that sets out how it will manage Safeguarding.
- Having up-to-date and documented risk assessments.
- Maintaining a register of the Organisation legal obligations for Safeguarding and workplace health and safety in all jurisdictions in which it operates.
- Implementing policies, procedures and systems that introduce controls to reduce the likelihood and consequence of incidents.
- Maintaining two reporting processes: the confidential reporting process, and the overt reporting process.
- Having an incident response plan.
- Undertaking audits of staff, volunteers, contractors and third parties to ensure adherence to the Organisation's Safeguarding Policy and Code of Conduct. And
- Monitoring and reviewing the effectiveness of its Safeguarding program.

Reference, [Risk Management Policy](#), [Risk Management and Assessment Procedures](#) and [AIG Board Governance Manual](#).

Safe Online

The Organisation takes the threats posed to vulnerable people through online interactions seriously and recognises that social media is changing how people communicate.

The use of the Organisation IT access, online equipment and/or communication and gaming platforms are to be conducted in accordance with this policy, the [Information, Technology, Cyber Security and AI Policy](#), in conjunction with the organisation's [Code of Conduct](#). All staff digitally sign an acknowledgement of adhering to all company policies, including the [Code of Conduct](#).

Any discovery or suspicion of inappropriate, illegal content, contact or coercion, such as child exploitation material, suspected grooming or sextortion or other abuse, on any device or equipment connected in any way with the Organisation's, regardless of ownership, must be reported immediately to Management and if appropriate, to Police following the [Incident Management Policy](#) and procedures, provided within that policy.

Staff, volunteers or contractors are not to:

- Post or share (either online or offline) any material that is offensive, harassing, discriminatory, embarrassing, intimidating, sexually explicit, bullying, hateful, racist, sexist or otherwise inappropriate.
- Contact children, young people or vulnerable persons for non-urgent contact or communication out of hours.
- Have outside contact with children, young people and vulnerable peoples except for meetings where others are present, program-specific internet contacts through the Organisation' email system or brief telephone or texting contact for routine purposes such as scheduling.

Any contact or communication must be undertaken on a publicly visible platform rather than a private forum. Any breach of this requirement must be reported and will be treated seriously.

The Organisation provides training to staff and volunteers, about what is and what is not acceptable online behaviour - necessarily balanced, as is appropriate, with vulnerable people's right to privacy, independence and choice.

Reference, [Information, Technology, Cyber Security and AI Policy](#), [Privacy and Confidentiality Policy](#) and [Photography of Children and Vulnerable People Policy](#).

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Reporting of a Safeguarding Incident

Managing Safeguarding Incidents

All staff, volunteers, contractors and third parties who have grounds to suspect abusive activity must report any suspicion or reasonable belief that an incident

- Has taken place.
- May be taking place. or
- Could take place.

All reporting must follow the Organisation incident management and reporting procedure, referenced in the [Incident Management Policy](#) and [Incident Reporting - Process Diagram](#). Reports can be made through CEO:

- Any director or board member.
- The Chief Executive Officer.
- Any manager or supervisor.
- The Relevant officer. and
- The organisation's incident management system.

The contact details to report all incidents or near misses are outlined in the [Emergency, Disaster and Evacuation Plans Procedure](#).

If you believe a child, young person or vulnerable person is in immediate danger, in a life-threatening situation or safety or welfare is at risk telephone the Police on Triple Zero (000).

Internal Reporting: Responding To Suspected Incidents

All suspected, perceived and potential incidents (including Mandatory Reporting) must also be reported through the Organisation Incident Management Procedure, referenced in the [Incident Management Policy](#), and recorded in the client management system and Incident Management Register. They will be managed through an incident response plan.

A report is to contain:

- 1) The name and contact details of the reporter.
- 2) The name of the child, young person or vulnerable person's or, if a name cannot be obtained after reasonable inquiries, a description of the young person or vulnerable person's.
- 3) If, or to the extent, known to the reporter:
 - a) The date of birth.
 - b) Information about where the person lives.
 - c) The names of the parents (if applicable), guardian or other appropriate persons.
- 4) The grounds for the reporter's belief that the child, young person or vulnerable person's has been the subject of sexual abuse or is the subject of ongoing sexual abuse.
- 5) If, or to the extent, known to the reporter:
 - a) The name of any person alleged to be responsible for the sexual abuse.
 - b) The person's contact details. and
 - c) The person's relationship to the child.

The contact details to report all incidents or near misses are outlined in the [Emergency, Disaster and Evacuation Plans Procedure](#).

External Reporting

Any staff, volunteer, contractors or third parties who have grounds to suspect abusive activity must immediately notify the Organisation management and, where required, contact appropriate authorities including, the Police on Triple Zero (000).

Reporting within the organisation may be directed through:

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- a) Any director or board member.
- b) The Chief Executive Officer.
- c) Any manager or supervisor.
- Calling the Organisation on [\(08\) 9201 8900](tel:0892018900) or emailing at info@inclusionwa.org.au
- The organisation's Incident Management system.
- Contacting the appropriate authority directly, including the Police.

The contact details to report all incidents or near misses are outlined in the [Emergency, Disaster and Evacuation Plans Procedure](#).

Mandatory Reporting: Reportable Conduct

If the management is informed of a complaint or disclosure that may be reportable conduct under the applicable Reportable Conduct Scheme and which has not yet been reported to the appropriate authorities, management must determine if the circumstances constitute a reasonable belief of abuse and reportable conduct:

- a) If you believe a child, young person or vulnerable person is in immediate danger or in a life-threatening situation telephone the Police on Triple Zero (000).
- b) If Management determines a reasonable belief that an individual has engaged in reportable conduct such as:
 - i. Any sexual offence, or sexual misconduct, committed against, with or in the presence of a child (including child pornography offences).
 - ii. Any assault, ill-treatment or neglect of a child.
 - iii. Any behaviour that causes significant emotional or psychological harm to a child; or
 - iv. Criminal offences such as the failure to reduce or remove risk of a child becoming the victim of abuse and concealing child abuse.
- c) The complaint or disclosure must be reported to the appropriate authorities (refer [Appendix E: State and Territory Mandatory Reporting Contacts](#)) within Three (3) days after becoming aware of a reportable allegation.
- d) If Management determines that there is not a reasonable belief and/or the conduct is not reportable conduct within the meaning of the applicable legislation, they are not required to report the complaint or disclosure, but the decision and the reasons for that decision must be documented in writing.
- e) A decision by Management not to report a complaint or disclosure to the appropriate authorities does not prevent any other staff member, volunteer, contractor or board member from reporting it to the appropriate authorities.
- f) Management will notify the appropriate authorities (refer [Appendix E: State and Territory Mandatory Reporting Contacts](#)) of:
 - Any allegation of reportable conduct, or conviction of reportable conduct, against an employee of the Organisation when the management becomes aware.
 - If the Organisation proposes to take disciplinary action against the employee, volunteer or contractor (and the reasons why it intends to take or not take any such action). And
 - Any written submissions made to the Organisation concerning any such allegation or conviction that the employee concerned wished to have considered in determining what (if any) disciplinary or other action should be taken in relation to the employee, volunteer or contractor.

All incidents and the status of an investigation is to be stored against the client's profile, in the client management system, and will record in the Organisation incident management register.

INVESTIGATING AN INCIDENT

All incidents or suspected incidents will be investigated following the Organisation Incident Management procedure.

If appropriate authorities or the Police decide to investigate a reported incident, all employees, volunteers and contractors must cooperate fully. Management will ensure reporting, privacy and employment law obligations are met and notify the Insurer of any reporting of a safeguarding incident, including sexual or serious physical assault.

If it is decided that it will not conflict with any proceeding of the authorities or receiving clearance from authorities, the Chief Executive Officer or relevant officer will conduct an internal investigation and all staff, volunteers and contractors must co-operate fully.

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All incidents and the status of an investigation is to be stored and recorded in the Organisation's incident management system.

The Organisation will make every effort to keep any such investigation confidential.

EXTERNAL INVESTIGATION

Where an investigation is referred to appropriate external authorities (including the Police) all staff, volunteers, contractors and board members must cooperate with the external investigators.

A person who attends who is the subject of a complaint, whether related to activities of the Organisation or not, must:

- a) Immediately inform management or the Relevant officer.
- b) Cooperate with the appropriate authorities in their investigation of the complaint.
- c) Comply with Management's directions regarding that person's participation in the Organisation's activities and interactions with children, young people and vulnerable people. and
- d) Keep Management informed of the investigation status into the complaint and its resolution.
- e) All incidents and the status of an investigation is to be stored and recorded in the Organisation's incident management system

INCIDENT REGISTER

The Organisation strictly maintains an Incident Register. The Incident Register is a thorough record of all Information about all incidents that come to the attention of any staff member at any time.

Details of all incidents to be recorded in the Organisation Incident Register, including:

- Names and contact details of all people involved.
- Names of the person making the incident report.
- Dates.
- Timeframes.
- Details of the incident.
- Details of the Organisation's management personnel who were notified.
- Details of any authorities who were notified.
- Actions taken and outcomes.

The CEO is required to report incidents to the Board, Insurance provider and any appropriate authority (as required by law).

DISCIPLINARY ACTION

While an investigation is conducted, the Organisation reserves the right to:

- Report the matter to appropriate authorities, including the Police or appropriate authorities as required under legislative requirements; and/or
- Stand the staff, volunteer or contractor down (with pay, where applicable).
- At the conclusion of any investigation and a breach of the organisation's policies or Code of Conduct is identified the Organisation reserves the right to:
 - Take disciplinary action against those it believes are responsible, which may include dismissal.
 - Terminate or cease involvement with the Organisation.
 - Take legal action.

SUPPORTING PARTIES AFFECTED BY A COMPLAINT

All staff, volunteers and management understand their response to a child, young person or vulnerable person's disclosure of abuse.

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A complaint must be treated seriously, respectfully and sensitively. Management must support a child, young person or vulnerable person who makes a complaint or discloses.

The Organisation will offer appropriate psychological first aid and support to anyone implementing any aspect of this policy while acting on behalf of the Organisation.

The Organisation will provide support to child, young person or vulnerable people who are victims of abuse and their families, where legally and professionally possible, including accessing professional services by:

- Giving the child, young person or vulnerable person your full attention.
- Maintaining a calm appearance.
- Letting the child, young person or vulnerable person take their own time.
- Letting the child, young person or vulnerable person use their own words – don't ask questions. Just listen.
- Reassuring the child, young person or vulnerable person that it is right to tell.
- Accepting the child, young person or vulnerable person will disclose only what is comfortable and recognise the bravery/strength of the child, young person or vulnerable person for talking about something difficult.
- Telling the child, young person or vulnerable person what you plan to do next.
- Reporting to Management and appropriate authorities the incident without delay.

See [Appendix D: How to respond to a person who makes a disclosure for further information](#).

PRIVACY AND INFORMATION SHARING

A complaint must remain strictly confidential to the extent permitted by law. The Organisation expects all employees, volunteers and contractors to maintain confidentiality.

All personal information identified or recorded will respect the privacy of the individuals involved unless there is a risk to someone's safety. The Organisation has policies and procedures to protect any personal information.

However, information should be shared with appropriate authorities (including Police) if a child, young person or vulnerable person is deemed to be at risk of harm, in immediate danger, or a crime has been committed.

Reference, [Privacy and Confidentiality Policy](#) and [Code of Conduct Policy](#).

WHISTLE-BLOWER PROTECTION

It is important that people within the Organisation have the confidence to come forward to speak or act if they have any concerns or incidents of behaviour that contradict any behaviour outlined in the Code of Conduct.

The Organisation Whistle-blower Policy describes the protections available to whistle-blowers, what matters are reportable, how employees, volunteers and contractors can report concerns without fear of harm, and how the Organisation will support and protect them.

Reference, [Whistleblower Policy](#) and [Whistleblower Procedure](#).

BREACHES

Any breach of this policy may result in disciplinary action, including but not limited to the termination of involvement, engagement or employment with the Organisation.

CONTINUOUS IMPROVEMENT

The Organisation management must review this policy to ensure it remains compliant with the law and relevant to the developing needs of children, young persons and vulnerable people.

- Annually (or more frequently if required due to changes in legislation); and
- After every complaint of abuse

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Any person may, and is encouraged to, provide feedback about the policy. Either in writing, verbally or in any other way, management will consider this feedback in making changes to improve the safety of children, young persons and vulnerable people.

After every complaint of abuse or breach of this policy, management will act to prevent recurrence. Actions may include:

- A) Seeking advice from the appropriate authorities or individuals with appropriate professional expertise on abuse and safety.
- B) Reviewing this policy.
- C) Reviewing risk assessments and activity guidelines.
- D) Providing closer supervision of persons or activities.
- E) Further education and training.
- F) Advising the appropriate authorities regarding a person's suitability to work with children, young persons or vulnerable people and/or
- G) Disciplinary procedures.

GOVERNANCE

The organisation board will ensure safeguarding to prevent abuse and neglect has adequate risk governance, processes and resources by

- Making sure safeguarding governance training is provided for all board members by an expert in safeguarding.
- Making sure safeguarding is a standing item for all board meetings.
- Ensuring policies and procedures address all the appropriate national vulnerable person's standards and/or principles and are reviewed by the board at least annually. Records of such reviews are to be minuted.
- Consulting with stakeholders, staff, volunteers, vulnerable people, their families, contractors, partners, insurers, peak bodies and others as appropriate to inform the development of the organisation's policies and procedures relating to safeguarding.
- Providing and/or facilitating safeguarding training, including induction and regular refresher training, for all employees, contractors, and volunteers to access, understand and apply these policies and procedures.

RELATED POLICIES, PROCEDURES AND DOCUMENTS

This policy must be read in conjunction with:

The relevant laws of the Commonwealth State or Territory.

[Whistleblower Policy.pdf](#)

[Code of Conduct Policy.pdf](#)

[Privacy and Confidentiality Policy.pdf](#)

[Whistleblower Procedure.pdf](#)

[Sexual Harassment Policy.pdf](#)

[Human Rights Policy](#)

[Incident Management Policy](#)

[Incident Management Process - Flow diagram.pdf](#)

[Incident and Service Improvement Registers - Flow Diagram](#)

[Direct Support Incident Reporting Process Diagram](#)

[External Complaints Policy](#)

[External Complaints Process - Flow Diagram.pdf](#)

[Training and Development Policy](#)

[Code of Conduct Policy.pdf](#)

[Quality Management System Policy.pdf](#)

[Positive Behaviour Support and the Use of Restrictive Practices Policy](#)

[Individual Needs Policy.pdf](#)

[Supported Decision-Making Policy.pdf](#)

[Social and Community Participation Policy.pdf](#)

[Privacy and Confidentiality Policy](#)

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[Code of Conduct Policy](#)

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APPENDIX A – SAFEGUARDING DEFINITIONS

Term	Definition
Abuse	<ul style="list-style-type: none"> • All forms of physical and mental abuse, exploitation, coercion or ill-treatment. This might include, for example: • physical abuse. • emotional abuse. • threats of, or actual violence, verbal, emotional or social abuse. • sexual harassment, bullying or abuse. • sexual criminal offences. • cultural or identity abuse, such as racial, sexual or gender-based discrimination or hate crime. • coercion and exploitation. • abuse of power; and • neglect.
Adult	<ul style="list-style-type: none"> • A person who is not a child.
Child or young person	<ul style="list-style-type: none"> • A person under the age of 18 years.
Child abuse	<ul style="list-style-type: none"> • Is emotional abuse, neglect, physical abuse and/or sexual abuse (all as defined) to a child.
Child Safe Organisation	<ul style="list-style-type: none"> • An organisation that consciously and systematically: • creates conditions that reduce the likelihood of harm to children. • creates conditions that increase the likelihood of identifying and reporting of harm. • responds appropriately to disclosures, allegations and suspicions of harm.
Complaint	<ul style="list-style-type: none"> • Includes any allegation, suspicion, concern or report of a breach of this Policy or the Organisation's Code of Conduct. It also includes disclosures made to the Organisation that may be about or relate to abuse in an the Organisation context. • the Organisation may receive a complaint: • Directly or through a redress scheme (should one exist). • From anyone – a child, adult survivor, parent, trusted adult, independent support person, staff member, volunteer or community member. • About an adult allegedly perpetrating child sexual abuse or about a child exhibiting harmful sexual behaviours; or • In writing, verbally or as a result of other observations, including behavioural indicators. • A complaint may become a 'report' to an external authority or agency.
Disclosure	<ul style="list-style-type: none"> • A process by which a child, young persons or vulnerable person conveys or attempts to convey that they are being or have been sexually abused, or by which an adult conveys or attempts to convey that they were sexually abused as a child. • This may take many forms and might be verbal or non-verbal. Non-verbal disclosures using painting or drawing, gesticulating, or through behavioural changes, are more common among young children, children and vulnerable people with cognitive or communication impairments. Children, in particular, may also seek to disclose sexual abuse through emotional or behavioural cues, such as heightened anxiety, withdrawal, aggression or inappropriate sexual behaviour. • Disclosures can be intentional or accidental, and they might be prompted by questions from another person or triggered by a memory of the abuse. A disclosure may also become a 'complaint' when made to the Organisation or a 'report' when made to an external authority or agency.
Emotional or Psychological Abuse	<ul style="list-style-type: none"> • Serious psychological harm can occur where the behaviour of their parent or caregiver damages the confidence and self-esteem of the child, young persons or vulnerable person, resulting in serious emotional disturbance or psychological trauma. • Although it is possible for 'one off' incidents to cause serious harm, in general it is the frequency, persistence and duration of the parental or carer behaviour that is instrumental in defining the consequences for the child or young person. • This can include a range of behaviours such as excessive criticism, withholding affection, exposure to domestic violence, intimidation or threatening behaviour.
Grooming	<ul style="list-style-type: none"> • Behaviours that manipulate and control a child, their family and other support networks, or institutions with the intent of gaining access to the child, obtaining the child's compliance, maintaining the child, young persons or vulnerable person's silence, and avoiding discovery of sexual abuse. • Grooming can take place in person and online and is often difficult to identify and define. This is because the behaviours involved are not necessarily explicitly sexual, directly abusive or criminal in themselves, and may only be recognised in hindsight. • Some grooming behaviours are consistent with behaviours or activities in non-abusive relationships, and can even include desirable social behaviours, with the only difference

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1.0	28/08/2024	CEO	Ratified – based on changes above, and Safeguarding insurance requirements	01/09/2026
1.1	20/02/2025	Nikki Ilich	Company banner updated	01/09/2026

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	<p>being motivation. Perpetrators can groom children, other people in children’s lives, and institutions.</p> <ul style="list-style-type: none"> • Grooming may take a number of forms. • Building trust. • Favouritism. • Gaining the trust of the child’s or young person’s parents or carer/s. • Isolation - from family and/or, friends. • Intimidation and secrecy ‘Testing the waters’ or boundary violation. • Shaping the persons perceptions.
Harm	<ul style="list-style-type: none"> • A detrimental effect to a child, young person or vulnerable person’s safety or well-being caused by abuse.
Mandatory Reporting	<ul style="list-style-type: none"> • Where a legislative requirement is placed where there is the organisation forms a reasonable belief that a report needs to be made to report regarding known and/or suspected cases of child abuse and neglect to the appropriate state-based authority. This may be a nominated government department or agency (typically the Police and/or child protection authority).
Neglect	<ul style="list-style-type: none"> • Is when a parent, guardian caregiver cannot regularly give a child, young person or vulnerable person the basic things needed for his or her growth and development, such as food, clothing, shelter, medical and dental care, adequate supervision, and enough parenting and care.
Person at Risk	<ul style="list-style-type: none"> • Person aged 18 years and over who: • has care and support needs. • is being abused or neglected, or are at risk of abuse or neglect; and • is unable to protect themselves from abuse or neglect because of their care and support needs.
Physical Abuse	<ul style="list-style-type: none"> • Is a non-accidental injury or pattern of injuries to a child, young persons or vulnerable person caused by a parent, caregiver or any other person. It includes but is not limited to injuries which are caused by excessive discipline, severe beatings or shakings, cigarette burns, attempted strangulation and female genital mutilation. • Injuries include bruising, lacerations or welts, burns, fractures or dislocation of joints. Hitting child, young persons or vulnerable people around the head or neck, or using a stick, belt or other object to discipline or punishing a child or young person (in a non-trivial way) is a crime.
Reasonable grounds for belief	<ul style="list-style-type: none"> • A reasonable belief is a belief based on facts that would lead a reasonable person to think that reportable conduct may have occurred. • A reasonable belief is more than suspicion. There must be some objective basis for the belief. However, it does not require certainty. For example, a person is likely to have a reasonable belief if they: <ul style="list-style-type: none"> • observed the conduct themselves • heard from a child that the conduct occurred • received information from another source (including another person who witnessed the reportable conduct or misconduct). • The head of the organisation does not need to share the person’s reasonable belief regarding the allegation.
Reportable Conduct	<ul style="list-style-type: none"> • Conduct that must be reported under legislation that obliges designated institutions to report allegations of institutional child sexual abuse to an independent statutory body.
Reportable conduct scheme	<ul style="list-style-type: none"> • A scheme established under legislation by a State or Territory to monitor, investigate and report on reportable conduct.
Risk of Significant Harm	<ul style="list-style-type: none"> • A Vulnerable person is at risk of significant harm if the circumstances that are causing concern for the safety, welfare or wellbeing of the vulnerable person are present to a significant extent. Significant means serious enough to warrant a response by a statutory authority irrespective of a family’s consent.
Safeguarding	<ul style="list-style-type: none"> • Protecting the welfare and human rights of people that are, in some way, connected with your organisation its work – particularly people that may be at risk of abuse, neglect or exploitation.
Relevant officer	<ul style="list-style-type: none"> • The Member of the Organisation appointed by the Management to coordinate the Organisation administration.
Sexual Abuse	<ul style="list-style-type: none"> • Any act which exposes a child, young person or vulnerable person to, or involves a child, young person or vulnerable person in, sexual processes beyond his or her understanding or contrary to accepted community standards. Sexually abusive behaviours can include the fondling of genitals, masturbation, oral sex, vaginal or anal penetration by a penis, finger or any other object, fondling of breasts, voyeurism,

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	<p>exhibitionism, and exposing the child, young person or vulnerable person to or involving the child, young persons or vulnerable person in pornography. It includes grooming, which refers to actions deliberately undertaken with the aim of befriending and establishing an emotional connection with a child, to lower the child, young persons or vulnerable person's inhibitions in preparation for sexual activity with the child, young persons or vulnerable person.</p>
Vulnerable person	<ul style="list-style-type: none"> • Vulnerable people are defined as a people aged under 18 or other individuals who may be unable to take care of themselves or are unable to protect themselves against harm or exploitation. • While all people must be protected from harm, there are additional legislative and ethical considerations for protecting vulnerable people. Vulnerable people can include: <ul style="list-style-type: none"> • children and seniors • people with impaired intellectual or physical functioning • people from a low socio-economic background • people who are Aboriginal or Torres Strait Islanders • people who are not native speakers of the local language • people with low levels of literacy or education • people subject to modern slavery, which involves human exploitation and control, such as forced labour, debt bondage, human trafficking, and child labour.
Whistle-blower	<ul style="list-style-type: none"> • Anyone who makes or attempts to make a report of Reportable Conduct under this Policy, and is, or has previously been, an employee, volunteer, contractor, third party, child, young person or vulnerable person in the care of the Organisation or is a relative or dependent of such persons.
Working with Children Check	<ul style="list-style-type: none"> • A pre-employment screening program which ensures child-safe working environments in Australia. • Pre-employment screening of adults and volunteers who come in contact with children is mandatory and legislated for across most States and Territories in Australia. However, there is no national framework setting out the requirements for obtaining a Working with Children Check (or Police Checks) - and each State and Territory has their own procedures and requirements
Young person	<ul style="list-style-type: none"> • A teenager who is a child. • Note: This term is used in recognition that a teenager may not identify as being a 'child' (notwithstanding the definition).

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Appendix B: Indicators of abuse

Employees and management play an important role in protecting customers from further harm by recognising the indicators of abuse and responding to them. The presence of one or more indicators does not mean that abuse has occurred but does require the Employee to be vigilant on the customer's behalf.

Indicators of abuse are not always obvious, and while customers or others may suspect that abuse has occurred, there might not be any evidence to confirm the suspicion. Indicators are variable people who are familiar with clients and have a strong positive relationship with them. They are often best placed to recognise behavioural changes, which may suggest that someone is being abused.

	Physical Indicators	Behavioural Signs
Elder Abuse	<ul style="list-style-type: none"> Injuries such as bruises, cuts, or broken bones Malnourishment or weight loss Poor hygiene Symptoms of anxiety, depression, or confusion Unexplained transactions or loss of money Withdrawal from family members or friends 	<ul style="list-style-type: none"> See financial abuse, neglect, physical abuse, emotional abuse
Financial Abuse	<ul style="list-style-type: none"> Restricted access to or no control over personal funds or bank accounts No records or incomplete records kept of expenditure and purchases Missing money, valuables or property Appearance, clothing / other items are of poor condition Forced changes to wills or other legal documents 	<ul style="list-style-type: none"> Stealing from others Borrowing money Begging Missing out on outings / events that they used to be able afford to go to
Emotional or Psychological Abuse	<ul style="list-style-type: none"> Speech Disorders Weight loss or gain Avoiding home (particularly if the abuser is in the family home) Running away or continually staying at friend's houses Fear of the dark, not wanting to go to bed, bedwetting or nightmares Lying or stealing Lack of trust in adults Poor self-image or self-esteem Poor academic performance Poor peer relationships Secretive, demanding or disruptive behaviour 	<ul style="list-style-type: none"> Feelings of worthlessness about life and self; extreme low self-esteem, self-abuse or self-destructive behaviour. Extreme attention seeking behaviour and other behaviours (e.g. bullying disruptiveness, aggressiveness) Excessive compliance Depression, withdrawal, crying
Grooming		<ul style="list-style-type: none"> Talks a lot about a particular adult or older child, or wants to spend a lot of time with them or meet them alone Is in a relationship with a much older person Is skipping school or sporting activities Is spending less time with friends or changes friendship groups suddenly Spends more time alone in their room Has unexplained gifts like new toys, clothes, jewellery or electronics and doesn't want to talk about where the gifts came from Doesn't want to talk about what they've been doing or lies about it Stops telling you about their day or asking for your advice.
Neglect	<ul style="list-style-type: none"> Hunger and weight loss Poor hygiene Poor hair texture 	<ul style="list-style-type: none"> Requesting, begging, scavenging or stealing food

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	<ul style="list-style-type: none"> Inappropriate or inadequate clothing for climatic conditions Inappropriate or inadequate shelter or accommodation Unattended physical problems or medical needs Health or dietary practices that endanger health or development Social isolation. Pressure marks that indicate being left in one position for too long Developmental delay Sallow or sickly appearance Abnormally high appetite, stealing or hoarding food Smelly or dirty appearance 	<ul style="list-style-type: none"> Constant fatigue, listlessness or falling asleep Direct or indirect disclosure Extreme longing for company Anxiety about being alone or abandoned Displaying inappropriate or excessive self-comforting behaviours
Physical Abuse	<ul style="list-style-type: none"> Facial, head and neck bruising or injuries Drowsiness, vomiting, fits (associated with head injuries) Unexplained or poorly explained injury Other bruising and marks may suggest the shape of the object that caused it Bite marks or scratches Unexplained burns or scalds Unexplained fractures, dislocations, sprains 	<ul style="list-style-type: none"> Explanation inconsistent with the injury: explanation varies Avoidance or fearfulness of a particular person or employee Sleep disturbances (e.g. nightmares, bed wetting) Changes in behaviour (e.g. out of character aggression, withdrawal, excessive compliance)
Sexual Abuse	<ul style="list-style-type: none"> Direct or indirect disclosure Sexual act described by the person Trauma to the breasts, buttocks, lower abdomen or thighs Difficulty in walking or sitting Injuries (e.g. tears or bruising), pain or itching to genitalia, anus or perineal region Torn, stained or blood-stained underwear or bedclothes Unexplained sexually transmitted infections Unexplained accumulation of money or gifts 	<ul style="list-style-type: none"> Repeat use of words e.g. "bad", "dirty" Self-destructive behaviour, self-mutilation Sudden changes in behaviour or temperament, e.g. depression, anxiety attacks, withdrawal, agitation, anger, violence, absconding, seeking comfort and security Inappropriate advances to others Sleep disturbances, refusing to go to bed, going to bed fully clothed Eating disorders Refusing to shower or constant showering Changes in social patterns, refusing to attend usual places (work, respite)
Elder Abuse	<ul style="list-style-type: none"> Injuries such as bruises, cuts, or broken bones Malnourishment or weight loss Poor hygiene Symptoms of anxiety, depression, or confusion Unexplained transactions or loss of money Withdrawal from family members or friends 	<ul style="list-style-type: none"> See financial abuse, neglect, physical abuse, emotional abuse

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Appendix C: Recognising Child Abuse

Child abuse includes:

- a) Any act committed against a child involving:
- b) A sexual offence; or
- c) Grooming.

The infliction, on a child, of

- a) Physical violence; or
- b) Serious emotional or psychological harm.
- c) Serious neglect of a child.

People in contact with children and their families should be aware of the indicators of child abuse. Recognising indicators of child abuse is part of forming a responsible suspicion that harm to a child has occurred, is occurring or that there is a risk of harm.

Sexual offenders exploit the dependency and immaturity of children. They may use a range of tactics including force, threats, and tricks to engage children in sexual contact and to try to silence them. They may also try to gain the trust and friendship of parents or caregivers to obtain access to children. They may be family members or close family friends.

Possible indicators of child sexual abuse, which may be present either individually or in combination, include:

- a) Direct or indirect disclosures.
- b) Describing sexual acts.
- c) Age-inappropriate behaviour and/or persistent sexual behaviour.
- d) Bleeding from the vagina or external genitalia or anus.
- e) Injuries such as tears or bruising to the genitalia or anus.
- f) Injuries to the breasts, buttocks, lower abdomen and thighs.
- g) Self-destructive behaviour, drug dependency, suicide attempts, self-mutilation.
- h) Overtly sexual themes in artwork, play or writing.
- i) Changes in eating habits such as anorexia or overeating.
- j) Going to bed fully clothed.
- k) Regression in developmental achievements.
- l) Unexplained accumulation of money or gifts.
- m) Sexually transmitted diseases.
- n) Persistent running away from home; and/or

Other symptoms of child stress, which may be indicators of child abuse, include:

- a) Poor concentration at school.
- b) Sleeping or bedtime problems such as nightmares or bedwetting.
- c) Marked changes in behaviour including tantrums, aggressiveness, withdrawal, complaints of stomach aches and headaches with no obvious physical cause.
- d) Indicators in parents, caregivers, siblings, relatives, acquaintances or strangers.
- e) Exposing a child to pornography or using a child for pornographic purposes.
- f) Intentionally exposing a child to the sexual behaviour of others.
- g) Inappropriate nakedness of either a child or an adult in a child's presence such as inappropriate exposure of genitals.
- h) Having committed or being suspected of child sexual abuse.
- i) Forbidding a child to engage in age-appropriate activities.
- j) Coercing a child to engage in sexual behaviour with other children.
- k) Verbal threats of sexual abuse.

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- l) Denial of an adolescent's pregnancy by the family; and/or
- m) Domestic violence or physical child abuse.

Appendix D: How to respond to a person who makes a disclosure

DO	MESSAGES TO PERSON	DON'T
<ul style="list-style-type: none"> Find a private place where the person feels comfortable to talk Use a calm, reassuring tone If they have trouble communicating, consider whether another trusted person needs to be present who can accurately record the communication Talk to the person in language that is appropriate to their age and stage of life and understanding Let them tell their story in their way, using their own words, in their own time without re-telling it in your words Be open and non-judgmental Support the person in telling their experience without probing or pressing for details Consider any cultural sensitivity that may be involved and whether there is another staff member who might have the cultural knowledge to handle the matter better (particularly when involving Aboriginal and Torres Strait Islander people). Ask them what they prefer first. Sometimes, speaking about abuse with someone from their cultural community can be perceived as shaming for the person 	<ul style="list-style-type: none"> It is not their fault It was right to tell Abuse is not OK –no matter what Assess whether you or they will be at risk by informing them or their parents/carer that you will be following up on the matter If appropriate, explain that it is part of your job to inform people who may be able to assist when someone has been harmed or is potentially at risk of harm If appropriate, explain what will happen now, being careful not to commit actions beyond your control Acknowledge their concerns about “what will happen next” and “what may happen to the alleged perpetrator” 	<ul style="list-style-type: none"> Express disbelief, shock or disapproval Probe for additional information they are unwilling to provide Ask leading questions (i.e. questions that suggest answers or multiple-choice questions) Investigate the allegation yourself Make the person tell others Make promises not to tell anyone or other promises you can't keep Try to “close down” the conversation – this conveys the message that they have done something wrong and that it is not alright to tell Make negative comments or pass judgment about the alleged perpetrator – the person may have complex feelings about the alleged perpetrator, including love, and may feel loyal to them

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Appendix E: State and Territory Mandatory Reporting Contacts and Resources

If you believe a child is in immediate danger, in a life-threatening situation or requires medical assistance contact Triple Zero (000). If you have concerns on the safety and welfare of a child, contact the following. For Western Australia:

- Kids Help Line – 1800 551 800
- Police Assistance Centre – 131 444
- WA Police Child Protection Squad – 9428 1500
- WA Department for Child Protection local office. Refer www.dcp.wa.gov.au
- WA Crisis Care – 9223 1111 or **After Hours** Crisis Care Unit 1800 199 008 (free call STD)
- Department for Child Protection and Family Support Phone: (08) 9222 2555.
- Concern for a Child's Wellbeing: - The Central Intake Team on 1800 273 889.
- WA Mandatory Reporting Service: 1800 708 704.
- AdvoCare Inc. Elder Abuse Hotline 1300 724 679 or for Rural Communities 1800 655 566.
- Department of Communities <https://www.communities.wa.gov.au/>.

The following links provide information about child safe requirements, initiatives and resources for Western Australia.

- Commissioner for Children and Young People Western Australia.
- Western Australia Working with Children Check.
- Child Safe Organisations [Home | Child Safe Organisations \(humanrights.gov.au\)](http://Home | Child Safe Organisations (humanrights.gov.au)).
- Australian Charities and Not-For Profits Commission Governance Toolkit: Safeguarding vulnerable people | ACNC.

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Ar-94.4 11/2023

Version History Table:

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Appendix G: Reporting Abuse or Safety Related Misconduct

Who Can report	<ul style="list-style-type: none"> • Anyone • Child • Adults family, friend, guardian • Staff member or volunteer • Any other witness
What to Report	<ul style="list-style-type: none"> • You must report • Abuse or safety related matters including potential grooming • Current or historical disclosures of abuse • Current or historical allegations, suspicions or observations • Breaches of the safeguarding policy or code of conduct • Behaviours that could be deemed as grooming or in appropriate
How to Report	<ul style="list-style-type: none"> • Reporting can be done • Verbally in person or over the phone • Via email or in writing • The organisation's Incident Management system
Who to Report	<ul style="list-style-type: none"> • Reporting within the organisation may directed through [include relevant positions as outlined in the policy]: • Any director or board member. • The Chief Executive Officer. • Any Manager or Supervisor. • Call the Organisation on [phone number here] or emailing at [email address here]. • Contact the appropriate authority directly, including the Police and State and Territory Mandatory Reporting Contacts • All safeguarding incidents must be recorded in the Incident Management system
What Happens Next	<ul style="list-style-type: none"> • Offer support to the person involved • Initiate process to ensure the safety of the person and others • Where possible remove the person from the situation • If appropriate stand the staff, volunteer or contractor accused of the incident down (with pay, where applicable) • Report the matter to the appropriate authority including the Police. and State and Territory Mandatory Reporting Contacts • Wait for clearance from authorities to commence an in internal investigation

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