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1 summary

At **yourtown**, we aspire to be a world-class leader in safeguarding. Our vision is for our [team members](#) is to be [advocates and allies](#) for [safeguarding](#) 24/7.

It is very important to **yourtown** that we provide the safest and most appropriate services and environments to all children, young people and adults (CYPAR).

At **yourtown**, everyone has a right to be safe and feel safe. Creating a strong [safeguarding culture](#) is a shared responsibility of all **yourtown** team members, regardless of their level or position.

This document should be read in [conjunction](#) with:

- [yourtown's Safeguarding Commitment Positions Statement](#)
- [yourtown's Safeguarding Principles](#)
- [yourtown's Risk Appetite Statement – Safeguarding](#)
- [yourtown's Code of Conduct Policy](#)
- [yourtown's Consumer Rights Position Statement](#)
- [yourtown's Safeguarding Committee Terms of Reference](#)
- [yourtown's Practice Governance Principles](#)

yourtown's expectations of the behaviour of team members when interacting with children, young people and adults at risk (CYPAR) is enshrined within our Values and Core Behaviours and our Consumer Rights Position Statement and is supported by our Code of Conduct and Ethical Conduct and Practice Policy.

The SiPP [operationalises](#) **yourtown's** Safeguarding Principles. It [consolidates](#), at an enterprise-wide level, the full suite of **yourtown's** safeguarding procedures, protocols, and tools.

The Safeguarding Committee, (see the Safeguarding Committee's Terms of Reference) chaired by the CEO oversees the development, implementation, and review of the SiPP, as well as related compliance, risk management and auditing.

The SiPP is underpinned by an extensive safeguarding training regime for all team members, starting at induction and continuing at regular intervals to ensure ongoing focus and improvement.

[Implementation](#) of, and [compliance](#) with, the SiPP is monitored through Annual Safeguarding Audits (roles in relation to audits are set at the end of relevant sections of this document). This audit helps to drive **yourtown's** continual and quality improvements. See **yourtown** [Accreditation SharePoint](#) page for more information.

yourtown's Practice Governance Standards set the baseline for quality service delivery.

Where to go if you would like to know more about safeguarding at **yourtown**

All **yourtown** team members are responsible for ensuring anyone they work with or who is engaging with **yourtown** through them, has access to, or is aware of how to access information about **yourtown's** Safeguarding in Practice Policy (SiPP). There are a number of ways that team members can do this and tools to support in achieving this.

All resources to support **yourtown** team members to implement the SiPPP and share the SiPPP with those engaging our services through them are available on the **yourtown** [Safeguarding SharePoint](#) page.

All sites have been provided with Safeguarding stickers or posters that must be displayed in high traffic areas to ensure anyone accessing **yourtown** is aware of our safeguarding commitments

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and has the information needed to self-advocate. The responsibility for this lies with site or service managers.

The **yourtown** website has a [Safeguarding page](#) with essential safeguarding information available to all, including many of the above listed and linked documents. The Kids Helpline [website](#) also has a suite of age and ability appropriate information on safeguarding for children, young people and parents.

2 purpose

The Safeguarding in Practice Policy (SiPP) outlines **yourtown**'s requirements for safeguarding in practice and the measures and responsibilities all team members are required to take to safeguard children, young people, and adults at risk (CYPAR).

This document aims to:

- prevent harm from occurring by reinforcing the importance of our Safeguarding Risk Management Framework
- define safeguarding roles and responsibilities at all levels to reinforce that safeguarding is everyone's responsibility
- reaffirm our commitment to equity and inclusion (see diversity and inclusion commitment statement, stretch RAP)
- set a minimum requirement for safeguarding training for all **yourtown** staff members in relation to their safeguarding responsibilities
- set a minimum standard and expectation for anyone **yourtown** engages to provide a service to, for or with, **yourtown** and ensures, **yourtown**, partners with organisations that share our strong commitment to safeguarding, and
- set requirements for compliance with relevant laws and supports implementation of the National Principles for Child Safe Organisations, the Commonwealth Child Safe Framework, the National Catholic Safeguarding Standards, and relevant state and territory standards.

yourtown's commitment to safeguarding also ensures team members comply with relevant Australian state, territory, or federal laws regarding the creation of child safe environments. This document captures external compliance and practice requirements, including:

- *Care and Protection of Children Act 2007 (Northern Territory)*
- *Children and Community Services Act 2004 (Western Australia)*
- *Children and Young Persons (Care and Protection) Act 1998 (New South Wales)*
- *Children and Young People Act 2008 (Australian Capital Territory)*
- *Children and Young People (Safety) Act 2017 (South Australia)*
- *Child Protection Act 1999 (Queensland)*
- *Child Wellbeing and Safety Act 2005 (Victoria)*
- *Children, Young Persons and Their Families Act 1997 (Tasmania)*

3 scope

The SiPP applies to all of **yourtown** including, departments, team members, people leaders, services, programs, events, engagements, social platforms, virtual spaces and community presence. It focuses on ensuring the safety and wellbeing of all children, young people and adults at risk (CYPAR) that engage with our organisation. **yourtown** is responsible for the safety of everyone that engages with, accesses or attempts to access **yourtown**. Compliance with the SiPP is an [enterprise-wide](#) requirement.

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This document has an overarching scope, in that safeguarding principles must be [embedded](#) in the foundation of all of **yourtown** policies and the SiPP should be reflected and considered for relevance in all other **yourtown** policies and procedures. Safeguarding must be [integral](#) to all **yourtown** work, services and practice.

Key terms used throughout this document have been defined under section 8. For ease of the reader and to support accessibility of this document for all readers including [clients](#), the meaning of words has also been given in the document in their first appearance.

The roles and responsibilities set out in the SiPP apply to all **yourtown** team members and external service providers engaged by **yourtown**, where specified. In certain circumstances, clients, and visitors to **yourtown** may be subject to certain sections of the SiPP.

4 our commitment to cultural safety, diversity and inclusion

yourtown is committed to ensuring we provide a welcoming, safe, [equitable](#) and inclusive environment for people from all backgrounds, languages, and cultures, particularly recognising the significant role that cultural safety plays in the social, emotional, physical, and mental health of Aboriginal and Torres Strait Islanders people and communities that we engage with.

All team members are required to complete cultural safety training to ensure culturally safe environments for Aboriginal and Torres Strait Islander people.

Training is provided to relevant team members to equip them with the knowledge and understanding of diverse cultural backgrounds and how to create safe environments for all.

In keeping with **yourtown**'s stretch Reconciliation Action Plan (RAP), **yourtown** is committed to ensuring that Aboriginal and Torres Strait Islanders people who engage with **yourtown** are:

- able to express their culture, and enjoy their cultural rights in meaningful ways
- participate in, and be included in decisions about them, and in the work and design of **yourtown** services, and
- feel, and are, culturally safe when engaging with **yourtown**.

5 policy in practice

5.1 Recruiting safe and capable staff

5.1.1 Practice objective

yourtown, aims to, through recruitment, uphold the rights of children, young people, and adults at risk and safeguards them from actions that cause harm. This is achieved by ensuring that all team members are screened and deemed suitable to be working with children, young people and adults at risk (CYPAR) is a key first step.

5.1.2 Document/links relevant to this section

- [yourtown Code of Conduct Policy](#)
- [yourtown Safeguarding Screening Policy](#)
- [yourtown Safeguarding Screening Procedure](#)

5.1.3 Requirements and responsibilities

Key Department Owner - People and Culture

People and Culture is responsible for ensuring all recruitment and screening procedures are fully documented.

They are also responsible for screening all team members including students, volunteers and individual contractors as to their suitability to work with children, young people, and adults at risk

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as well as their ability to comply with **yourtown's** Safeguarding Policy and Code of Conduct including ensuring that:

- Employment advertising states **yourtown's** commitment to safeguarding and wellbeing.
- Position Descriptions set clear expectations about the role's requirements, duties and responsibilities regarding safeguarding and wellbeing, including that **yourtown** requires a satisfactory National Criminal History Check and, where relevant, a Working with Children Check (WWCC).
- Position advertising states **yourtown's** zero tolerance for abuse, bullying or harassment.
- Consideration is given to the prospective team member's attitude to working with children, young people, and adults at risk in line with **yourtown's** Mission and Values.

See **yourtown's** Safeguarding Screening Policy and Procedure for more details.

People and Culture is responsible for monitoring and reporting compliance with working with children and vulnerable people legislative requirements, in all relevant states and territories.

People and Culture, in consultation with People Leaders, are responsible for:

- assessing whether prospective team members have the appropriate skills, knowledge, or experience to work with CYPAR as relevant to the role,
- checking the suitability of the prospective team members to work with children, young people or adults at risk, including compliance with relevant laws, prohibiting employment, student placement or volunteering of people who pose an unacceptable risk of harm to children, young people or adults at risk and
- providing new team members with a safeguarding training regime.

People Leaders/Managers

People Leaders must advise People and Culture if they are intending to onboard external third-party providers that are classified as individual contractors (only) so that appropriate screening and/or recording of police and WWCCs can occur prior to any system access being granted.

5.2 Embedding safeguarding into induction and training

5.2.1 Practice objective

At **yourtown** safeguarding is embedded in induction and training. This ensures all **yourtown** team members have an awareness, knowledge and understanding of:

- the National Principles for Child Safe Organisations and National Catholic Safeguarding Standards
- how safeguarding is applied in practice at **yourtown**
- cultural and diversity inclusion, power dynamics and equity
- understanding, recognising and responding to abuse, harm, risk of harm, neglect and disclosures and reporting requirements for CYPAR.

5.2.2 Document/links relevant to this section

- [National Catholic Safeguarding Standards](#)

Safeguarding training developed by **yourtown** will include an understanding and acknowledgment of **yourtown's** relevant policies including:

- the SiPP
- [Code of Conduct](#) policies and documents
- reporting, investigation and grievance policies and procedures
- other policies and documents, which support safeguarding at **yourtown**, such as [yourtown's Stretch Reconciliation Action Plan](#) and the [Whistleblower Protection Policy](#).

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5.2.3 Responsibilities

Key Department Owner – People and culture

All safeguarding training and key learning activities developed by People and Culture in consultation with relevant Knowledge and Performance teams relate to key safeguarding policies, practices and processes, escalation and reporting requirements, and be role-appropriate for team members' knowledge and awareness responsibilities, location, and level of interaction with children, young people, and adults at risk.

yourtown Executives/Board and those in Safeguarding Specific Positions

As required by the National Catholic Safeguarding Standards, the **yourtown** leadership team and team members in safeguarding specific positions (including those on the Safeguarding Committee) must undertake the ACSL National Catholic Safeguarding Standards Introductory Session for Leaders (or current equivalent).

People Leaders

It is yourHeads and People Leader's responsibility to ensure that the training schedule developed for their Services/Programs/Teams is relevant to their roles and they must support team members to complete training required by relevant State/Territory developed to inform on reporting and safeguarding requirements specific to the location of the service.

yourtown Team Members

All team members must undertake safeguarding induction and training appropriate to their role including the foundational safeguarding induction and training regarding the SiPP.

All new team members will complete the safeguarding training in line with the relevant approved training plan consistent with their role, responsibilities, location and level of interaction with children, young people, and at-risk adults. As a minimum, this will occur within the first three months of employment. Team members in client facing roles should not be alone or out of line of sight to another staff member with children, young people or adults until all induction training relevant to their role has been completed. Additional ongoing safeguarding training will need to be undertaken by team members where it is identified as being relevant to their location, role, responsibilities, and level of interaction with children, young people, and at-risk adults. Additional training will be identified through an approved training plan specific to the service area and/or role.

As a minimum, refresher safeguarding training will occur every 12 months.

5.3 Assessing safeguarding risks

5.3.1 Practice objective

yourtown safeguarding risk management practice must incorporate procedures to assess, evaluate, review, and oversee safeguarding of children and adults at risk within its department's programs, activities and events and considers the needs of children and adults with diminished capacity, and how and when adults at risk make informed choices (dignity of risk).

5.3.2 Documents/links relevant to this section

- [Safeguarding Committee Terms of Reference](#)
- [Managing Risk SharePoint page](#)
- [Risk Register Template](#)
- [Enterprise Risk Management Framework \(RMF\)](#)
- [Risk Assessment Guideline](#)



5.3.3 Requirements and Responsibilities

Safeguarding Committee

The Safeguarding Committee oversees and monitors safeguarding risks and progress against mitigating them. The committee is responsible for monitoring the timely implementation, review and governance of safeguarding risk assessment and management plans at **yourtown** including oversight of resulting continuous improvement initiatives.

Key Department Owner – Enterprise Risk and Compliance

Enterprise Risk & Compliance (ER&C) must maintain frameworks and tools to support proactive safeguarding risk management across all areas of **yourtown**. Also, ER&C must assess and report on organisational safeguarding risks, including the controls, actions and timing/s to mitigate the risks.

People Leaders and Team Members

All **yourtown** team members are responsible for identifying and responding to risks and reporting risk to their leader and/or the ER&C function.

People Leaders responsible for a service/program and/or a one-off/periodic activity (e.g. event, workshop, training, engaging a third-party provider, project, etc.) must conduct a risk assessment in accordance with the Risk Assessment Guideline. This includes ensuring that risks, controls and actions are assigned to relevant owners. Risk assessments must be conducted prior to undertaking an activity, if there is a major change (e.g. service delivery method, location, new service, etc.) and at least annually.

People Leaders and team members may be risk owners, control owners and/or action owners, as defined in the Risk Management Framework (RMF).

5.4 Upholding rights and supporting self-advocacy

5.4.1 Practice objective

yourtown team members must recognise and respect the human rights of the children, young people, and adults at risk who they engage with and support them to understand and exercise these rights when engaging with **yourtown**. Team members must also comply with applicable human rights laws in each state and territory reflected in **yourtown**'s Code of Conduct Policy.

All who engage with **yourtown** are supported and encouraged to have their voices heard, to self-advocate, give feedback or complain, to seek justice, and to access counselling and other support services to overcome the impacts of harm.

yourtown acknowledges the importance of dignity of risk in the practice of upholding of rights and in the supporting of self-advocacy.

Dignity of risk means that individuals have the right to make choices about their own lives, even if those choices involve some level of risk. Risk-taking is a fundamental aspect of living a fulfilling life and promotes the idea that individuals should have autonomy and control over their decisions, even if there's a possibility of failure or negative consequences.

*In the context of the work that we do, **yourtown** has a duty of care to ensure that our clients have all the information we can provide/have to support individual decision making, where there is an element of risk as a result of the informed decision an individual client has made (impacting them solely), where possible and safe, **yourtown** can provide support by offering/suggesting controls and to mitigate that risk.*

5.4.1 Document/links relevant to this section

- [Corporate Governance Charter](#)



- [Consumer Rights Position Statement](#)
- [Safeguarding Commitment Position Statement](#)
- [Code of Conduct – yourtown website](#)
- [Feedback and Complaints Policy](#)
- Youth Engagement Strategy 2024 - 2026
- [Safeguarding SharePoint](#) page
- [Kids helpline](#) – yourtown website

5.4.2 Responsibilities – upholding human rights

Board and Executives

yourtown's Board and Executives are responsible for ensuring business practices are designed to uphold human rights, support meaningful participation and self-advocacy, and to be inclusive of, and responsive to, the diverse needs of all the children, young people, and adults at risk we engage with.

This approach is reflected through **yourtown**'s engagement, evidence gathering, advocacy and response to feedback and complaints, as well as service design and delivery.

All yourtown

Accessible versions of this and other policies are available on the **yourtown** website and safeguarding SharePoint, and team members should share these with clients either physically, virtually or verbally/in other ways on intake and where opportunities present themselves.

People Leaders

Site/Service Managers are responsible for ensuring their site displays information about children's/clients' rights and **yourtown** feedback and complaints processes.

Line Managers must provide guidance (in the form of procedures and/or supervision) to their team members around ways they can effectively and appropriately:

- provide information about rights in a way that is relevant to the service-setting, and accessible and appropriate to the person, having regard to their developmental, age and cultural needs,
- facilitate and support participation in decision making,
- proactively support and encourage self-advocacy and feedback, ensuring where relevant it aligns with **yourtown**'s policies on responding to harm, and
- comply with all relevant federal, state and territory human rights laws.

Team members who engage with children, young people and adults at risk

All team members must ensure children, young people, and adults at risk are informed about their rights when engaging with them, including the right to:

- feel safe¹ - physically, emotionally, culturally, socially, and spiritually
- to ask for information²
- participate on their own terms³

¹ Set out in Article 3 of the Convention on the Rights of the Child 1990 and Article 3 of the United Nations Universal Declaration of Human Rights (UDHR) 1948.

² Set out in Article 12 and 13 of the Convention on the Rights of the Child 1990 and Article 19 of the United Nations Universal Declaration of Human Rights (UDHR) 1948.

³ The right to self-determination is contained in Article 1 of the Covenant on Civil and Political Rights 1976 and in Article 1 of the Covenant on Economic, Social and Cultural Rights 1976.

- be safe from abuse⁴, harm and risk of harm, neglect⁵, and inadequate care⁶, and
- be informed of who to contact if they have concerns about their safety or the safety of their peers⁷.
- encourage and support active participation by children, young people, adults at risk where appropriate, their family members in relation to any decision making that affects them
- make decisions in a way that is compatible with a person's human rights including the dignity of risk when supporting clients in their decision making.
- give proper consideration to a person's human rights when making decisions.

There are a number of ways this can be achieved, and the Kids Helpline [website](#) and social media channels have a lot of information in age and ability appropriate formats to support clients understand their rights.

5.4.3 Responsibilities – upholding cultural rights

yourtown Team Members

Team members should encourage and support Aboriginal and Torres Strait Islander people and peoples of all lands and cultures to express their culture and enjoy their cultural rights by following the principles of cultural safety.⁸ These include:

- understanding and reflecting on personal cultural bias, attitudes and beliefs about 'others', and how these can shape practice, service delivery and relationships with clients,
- actively engaging in clear, value free, open, and respectful communication
- developing trust,
- recognising and avoiding stereotyping barriers,
- engaging with others in a two-way dialogue to support the two-way sharing of information,
- promoting and encouraging children, young people, and adults at risk to express their views, self-advocate or provide feedback on any issues they are concerned about, including in relation to **yourtown**.
- providing clear advice and support about appropriate ways CYPAR provide feedback, advocate for themselves and those they care about, and access support from external advocates.

5.5 Engaging clients, families and communities

5.5.1 Practice objective

yourtown's approach to working with young people is underpinned by the principles of inclusivity, mutually beneficial collaboration, respect, safety, choice, and community-mindedness.

Engagement with young people at **yourtown** is enabled and supported in a number of ways including both paid and unpaid options:

⁴ The right to protection from exploitation, violence and abuse is contained in Article 19(1) of the Convention on the Rights of the Child 1990, Article 20(2) of the International Covenant on Civil and Political Rights 1976, and Article 16(1) of the Convention on the Rights of Persons with Disabilities 2006.

⁵ The right for children to be properly cared for and to protect them from violence, abuse and neglect is contained in Article 19 of the Convention on the Rights of the Child.

⁶ See footnote 5.

⁷ See footnote 2.

⁸ The United Nations Declaration on the Rights of Indigenous Peoples (2007) HR/PUB/13/2.

- Volunteering opportunities (also referred to as youth participation)
- Casual and permanent employment opportunities
- Traineeships (also referred to as internships and associateships)
- Social enterprise
- Work experience
- Student placements

5.5.2 Documents/links relevant to this section

- Youth engagement strategy 2024 – 2026
- [Human Research Ethics Committee Terms of Reference](#)
- [yourtown Guide to Human Centred Service Design](#)
- Youth engagement policy (in development)
- [Organisational Practice Framework SharePoint page](#)

5.5.3 Commitments

Children, young people, and adults at risk play a central role in ensuring **yourtown** accurately identifies and designs for their diverse strengths and needs. **yourtown** is committed to authentic and mutually beneficial engagement with CYPAR. This includes:

- Advocacy to achieve system reform
- Designing, delivering and evaluating policies, programs and services
- Participation in organisational decision making

5.5.4 Engagement mechanisms

yourtown has a range of mechanisms to ensure meaningful, mutually beneficial engagement, including:

- **yourtown** Youth Network, which provides an opportunity for young people to have a direct input into **yourtown**'s work,
- involvement in staff recruitment
- paid and unpaid pathway options for young people through traineeships, social enterprises, casual and permanent employment, volunteering opportunities, work experience and student placements
- co-design and research
- presenting in forums for the purpose of advocacy
- youth engagement team member champions.

5.5.5 Engagement requirements

All engagement with CYPAR must be safe, inclusive and genuine. Consideration should be given to:

- ensuring physical and online environments are culturally and psychologically safe
- supporting equity and access respecting human rights and accommodating diverse needs.

5.5.6 Responsibilities

All yourtown

All **yourtown** are responsible for ensuring this sections practice objectives and should refer to **yourtown**'s youth engagement strategy, operational guide and policies, and the **yourtown** guide to Human Centred Service Design to understand further their responsibilities.

There is an expectation that all team members and services are involving service users and community as per the Youth Engagement Strategy 2024 – 2026 and as per the requirements of accreditation standards.



yourtown Human Research Ethics

The **yourtown** Human Research Ethics Committee is responsible for assisting **yourtown** to conduct or partner with human research to the highest ethical standards. It ensures that all participants engaging in human research at **yourtown**, and their personal data are appropriately respected. It also ensures that participants' rights, interests, welfare, privacy, and confidentiality are protected, and that they provide informed consent.

5.6 Maintaining a safe physical environment

5.6.1 Practice objective

yourtown is responsible for the health and safety of everyone accessing its workplaces, including children, young people, and adults at risk (CYPAR), and aim to provide physical environments that are safe for all who access and use them.

Hazards and increased opportunity for harm as a result of the physical environment must be considered in the assessing and mitigating of safeguarding risk. Workplaces may need to make particular adjustments to ensure that CYPAR remain safe and free from harm and to meet **yourtown** safeguarding requirements.

yourtown understands the important role education has in keeping everyone at **yourtown** safe and aims to provide children, young people, and adults at risk the information they need to feel empowered and to keep themselves and others safe in their physical environment.

yourtown's Welcome Information Booklet provides information to clients on **yourtown's** expectations for physical safety while engaging in our programs, services and accessing our sites.

*A physical environment refers to the external surroundings and conditions at **yourtown**, which may impact or influence a person's health.*

5.6.2 Documents relevant to this section

- Work Environment and Facilities Safety Blueprint
- [Workplace, Health, Safety \(WHS\) and Wellbeing Position Statement](#)
- [Duty of Care Position Statement](#)
- [Work, Health, Safety and Wellbeing Policy](#) (WHS Policy)
- [WHS Management Plan Checklist - Workshops](#)
- [Client workshop/training/group activity Attendance Record](#)
- [yourtown Welcome Information Booklet](#)
- [Home Visit and Outreach Procedure, Guideline](#) and [Tools](#)
 - [Quick Guide to Home or Outreach Visits](#)
- [Transporting Clients Procedure](#)
 - [Quick Guide to Transporting Clients](#)
- [Safe Physical Environments Guideline](#) and relevant service-specific policies and procedures, including:
 - [yourtown Emergency Management Plan](#) and residential agreements
- [Reportable Conduct Schemes Policy](#)
- [Critical Incident Policy](#)
- [Practice Governance Manual](#)
 - [Practice Governance Principles](#)
 - Practice Governance Investigation Procedure
 - Record a Client Incident Template -Form
 - Investigate a Client Incident Template - Form
 - Quick Guide to Opening a Client Incident QIS FACT
 - Quick Guide to Recording a Client Incident



- [Practice Governance Review Panel Terms of Reference](#)
- [Third-Party Providers and Safeguarding Guideline](#)
 - [Quick Guide to Onboarding Third Party Providers \(safeguarding\) and Tools](#)
- [Children Under the Supervision of yourtown Guideline](#)
- [Visitor Induction Procedure](#)
- [Safe Sleeping Practices Guideline](#)

yourtown is committed to and responsible for the health and safety of everyone in **yourtown** workplaces, as stated in our Workplace, Health, Safety and Wellbeing Position Statement and Duty of Care Position Statements.

5.6.3 Responsibilities

People Leaders

Line Managers are responsible for putting in place appropriate measures to mitigate against any physical safeguarding risks identified through the Safeguarding Risk Assessment (recorded in the sites Risk Register) for their service, program, or activity.

yourtown Team Members

All team members have a duty of care – a *responsibility* – to make sure that they, and others in the workplace, are safe, and are responsible for reasonably and practicably eliminating any physical safety risks in the workplace, including the additional safeguarding risks of opportunity for harm to CYPAR.

In addition to the requirements of this policy, all team members must follow the WHS and Wellbeing Policy and practices and play a role in ensuring that:

- their work environment, systems of work, machinery and equipment are safe and properly maintained,
- workplace facilities are clean and hygienic,
- any safety risks or incidents are reported in accordance with the WHS Policy
- when working outside standard workplaces, complying with other relevant Procedures such as the Transporting Clients Procedure and Home Visit Outreach Procedure.
- any safety risks or incidents are reported in accordance with the WHS Policy.

5.6.4 Responsibilities – workplace safety, signage, and instructions

People Leaders

Site/Service Managers, in consultation with the People and Cultures Work Health and Safety team and Property team are responsible for:

- ensuring that the physical environment, where possible, are designed or adjusted to meet the needs of anyone attending the service or program, and where not possible, alternative engagement options are considered
- considering the physical layout and placement of services in relation to child safety, opportunity for harm, and line of sight, including the nature of any services that are co-located, and,
- ensuring that where possible/relevant safety guidance materials, instructions, and signage, in workplaces are designed with consideration of the range of ages, abilities, literacy and communication needs of anyone attending the service or program.

5.6.5 Design requirements – workplace safety, signage and instruction

To ensure the safety of everyone in the workplace, an individualised, human-centred approach should be taken when considering the design, adjustments and signage or instructions that are required for respective workplaces and as outlined in the Work Environment and Facilities Safety

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Blueprint. For example, it may be appropriate in some workplaces to have WHS signage available in other languages.

5.6.6 Responsibilities – supporting children

yourtown Team Members

All team members working with children directly in face-to-face settings must:

- read and follow the Safe Physical Environments Guideline
- read and follow where relevant the Transporting Clients, Home Visit Outreach and Children under **yourtown's** Supervision Procedures.

5.6.7 Responsibilities – water safety

People Leaders

Line managers, in consultation with Work, Health and Safety, are responsible for ensuring that any workplace that has a pool or other bodies of water on site, such as ponds, water features or dams, or any workplaces where there is access to a pool or other bodies of water, complies with relevant state and territory laws and regulations in relation to appropriate fencing, signage and supervision around water.

yourtown Team Members at Residential Sites or those Facilitating Water Based Activities

All team members must advise clients, including children and young people, and other visitors, where relevant, about water safety upon induction into the service or during the pre-talk for activities, excursions or special events where bodies of water will be accessible. Clients must be told about the risk of drowning and understand that children must be supervised at all times by an adult when around any body of water, including baths, pools or dams.

5.6.8 Responsibilities – **yourtown** vehicles, and transporting clients

yourtown Property

The Property team must consult relevant managers and consider several factors before obtaining vehicles for **yourtown** services, and when assigning vehicles to **yourtown** service areas, including:

- whether the type of vehicle is suitable for the clients and team members at the service
- for example, is the car accessible for people with a disability? Can it be easily fitted with a car seat for infants or children, and have the anchorage points for the car seats been inspected by an authorised fitting station, and
- whether it would be appropriate for the vehicle to have **yourtown** branding
 - for example, it may not be appropriate for families escaping domestic and family violence be transported in a branded vehicle.

The Property team are also responsible for ensuring the vehicle is provided with appropriate safety equipment relevant to use for example, first aid kits and updating kits as requested on annual review by Service Managers to which the vehicles are attached.

People Leaders

A first aid kit must be kept in all **yourtown** vehicles and inspected annually. It is the Manager of the Service or Program that the vehicle is leased to that is required to ensure this occurs.

yourtown Team Members

Team members using a vehicle for work purposes, must first complete the **yourtown** Driver Safety online training module.

When transporting clients, team members must comply with the Transporting Client Procedure. For social enterprise trainees, team members must follow policies and procedures relevant to transporting team members.



Any client being transported in **yourtown** vehicles must provide an emergency contact and these should be accessible by the driver.

Child and/or infant car seats should be available and provided by **yourtown** in vehicles that will be used to transport clients that have young children. These must be correctly installed and meet Australian Standards and safety guidelines. The following should be considered:

- anchorage points should be inspected annually by an authorised fitting station
- team members should be trained in the correct use of infant and child car seats, and
- young children should not be transported in the front seat of a vehicle fitted with an airbag.

yourtown Team Members at Residential Sites

All team members at residential services must also read and adhere to their service-specific guidelines relating to transporting residential services clients, including pre-talk checklists and lock vehicle checks.

yourtown Team Members engaging or onboarding Third Party Providers

When working with other organisations that may need to transport clients, team members in consultation with relevant yourHead, Procurement or People and Culture team (where relevant) must include the appropriate conditions around transporting clients in the written agreement with that organisation (refer to the Third-Party Providers and Safeguarding Guideline for more information).

Any providers that are required to transport **yourtown** clients must meet the same safeguarding standards outlined in the Transporting Clients Procedure or Quick Guide.

5.6.9 Requirements – residential programs

Every home should be a safe home.

Clients in residential facilities are to be provided with information in an accessible format on keeping themselves safe on the premises, including emergency and evacuation plans and any other safety information that is relevant to the premises. Clients should be encouraged to report any safety or safeguarding concerns to **yourtown** team member/s promptly.

5.6.10 Responsibilities – residential programs

People Leaders

Service/Program Managers should ensure that residential agreements are in place for clients to ensure behavioural standards are understood and that those standards are in place to ensure both clients and team members at the service are and feel safe. Clients should be advised of **yourtown** Safeguarding requirements and the serious consequences of not adhering to safety and wellbeing standards (in accordance with the relevant site manual).

5.6.11 Requirements – safe sleeping

People Leaders

For residential services, or any other services where infants and children may sleep, there should be safe sleeping procedures or guidelines in place that are service specific such as the Safe Sleeping Practices Guideline. The following are additional external guidelines that may assist team members in performing their role:

- Royal Children's Hospital and Red Nose infant sleeping guides to support clients to maintain safe sleeping arrangements for their infants:
https://rednose.org.au/downloads/SafeSleepingGuideforParents_Mar21.pdf
- The Australian Children's Education & Care Authority has a guide on safe sleep and rest practices in children's education and care services:



<https://www.acecqa.gov.au/resources/supporting-materials/infosheet/safe-sleep- and-rest-practices>.

When supporting with safe sleeping practices, consideration should be given to dignity of risk and cultural safety.

5.6.12 Responsibilities - safe sleeping

People Leaders

Service Managers should ensure all team members are appropriately trained and aware of safe sleeping requirements for their programs including when children are under **yourtown's** supervision or care and ensure that these are captured appropriately in their risk register.

yourtown Team Members

Team members at residential services should support parents at their service to understand sleeping hazards and safe sleeping practices for infants, and to meet each child's need for sleep, rest and relaxation.

5.6.13 Requirement – domestic and family violence (DFV) services

There are a range of critical, additional steps that must be taken to ensure the safety of women, children and young people who are escaping family and domestic violence in its services, and of team members who work at these workplaces. DFV services are closed sites and have restricted and authorised access only, anyone accessing sites must sign and comply with **yourtown's** confidentiality agreement specific to the site.

5.6.14 Responsibilities – domestic and family violence services (DFV)

People Leaders

Managers of DFV residential services, in consultation with the Work, Health and Safety team, must ensure that there are adequate security systems and safety protocols in place to reduce the risks to clients, team members and others from violence. This must include:

- keeping the physical location and purpose of the service confidential and having a protocol in place to determine who can be given the physical address,
- having a protocol in place to determine who can visit and that those visits are by appointment only, and,
- monitoring and checking security devices to ensure that they are working correctly and not obstructed.

The Manager is also responsible for ensuring:

- all clients are informed that there is security equipment on site and that clients are encouraged to report all security breaches or safety concerns to team members, or in an emergency, the relevant emergency services.
- that all team members are trained in the use of all safety equipment on site and in lock-down procedures as required under **yourtown's** Emergency Management Plan.

yourtown Team Members

All team members must immediately report any concerns with the operation of the security systems or safety devices to the Service/Site Manager directly and to the Work, Health, and Safety team through the Quality Improvement System (QIS) so that equipment can be repaired or replaced immediately.

All team members at DFV related services are responsible for completing the following for any new client they intake:

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- Initial intake paperwork to identify any potential safety risks posed by the person using violence (PUV) and to assess the safety needs for women and their children (or other family members)
 - this includes the signing of a residential agreement, which outlines site guidelines and policies, including maintaining the confidentiality of the site.
- Comprehensive assessments with the person experiencing violence (PEV) to better understand the pattern of violence used by the person using violence (PUV) to support risk assessment and safety planning.
- A local safety plan ensuring the local areas surrounding the residential service are safe for the family and not known to the PUV or anyone familiar to them.
- All risk and safety assessments undertaken with the PEV must consider their emotional wellbeing, and be conducted in a sensitive, trauma-informed way.
- Regular reviews of clients' safety plans and risk assessments to account for any increased risks or changes in circumstance.
- Where relevant, risk assessing clients who have been observed to present a serious risk of harm to others (children, young people and adults at risk), remaining onsite.

All team members should ensure that children are treated as clients in their own right, including, where appropriate, individualised case support planning, including risk and safety planning, and support for trauma.

5.6.15 Requirement – home visit and outreach procedure, guideline and tools

All team members must follow the Home Visit and Outreach Procedure when visiting client homes, or meeting with clients outside of a **yourtown** workplace.

Team members visiting clients who are residing at **yourtown** transitional properties are not considered under this procedure and are to follow other service-specific guidelines that are in place.

5.6.16 Requirements – visitors to **yourtown** site or location

All **yourtown** sites, events and locations are required to have a procedure in place for visitors. Third Party Providers may be considered visitors when there is no agreement in place to support them as a third-party provider.

All visitors must follow **yourtown**'s Visitor Induction Procedure.

5.6.17 Responsibilities – visitors to **yourtown**'s site or location

yourtown Team Members

All team members that invite, facilitate or request an external party to attend a **yourtown** workplace, or any team members responsible for escorting any visitors at **yourtown** workplaces, must follow any approved **yourtown** visitor induction process or any service-specific procedures in place relating to visitors.

People Leaders

Service/Program Managers can introduce their own visitor procedures and/or processes, where required, only where it introduces stronger safeguarding and security requirements than the organisational wide policy, that are appropriate to the service setting.

5.6.18 Requirements – reporting safety concerns and incidents (internal)

All safety concerns and incidents, including near misses, hazards, concerns, events and new risks with no controls are required to be escalated, reported and recorded in QIS. Reporting even the seemingly minor is essential to **yourtown** quality and continual improvement, see the Practice Governance Manual for further details on these processes.



yourtown also has a Practice Principles for Reporting Child Sexual Abuse/Exploitation and Critical Incident Policy and all **yourtown** are to be aware of what constitutes a Critical Incident, deferring to this Policy as required. **yourtown** is also required to meet external reporting requirements for certain types of incidents and should be aware of these requirements relevant to their state/territory and roles.

5.6.19 Responsibilities – reporting safety concerns and incidents (internal)

yourtown Team Members

All team members must report any safety concerns, safety or safeguarding risk events, hazards and incidents to their immediate supervisor and ensure that a QIS FACT is opened within 24 hours for serious/notifiable/critical incidents. This may also involve additional reporting in the Client Information System (CIS). The Quick Guide to Opening a Client Incident QIS FACT support further with understanding the reporting process.

Team members must be familiar with and complete relevant training for all external and internal reporting requirements for different types of client incidents including those that are classified under:

- [reportable conduct](#) (see **yourtown** [Reportable Conduct Schemes Policy](#))
- criminal acts under various state/territory [Criminal Code](#) (see yourtown Reportable Conduct Schemes Policy)
- [mandatory reporting](#)
- critical incidents (see **yourtown** Critical Incident Policy)
- feedback and complaints (**yourtown** Feedback and Complaints Policy)

People Leaders

The Program/Service Manager (or delegate) is responsible for reviewing all incidents and determining if the immediate incident management requirements have been met (including relevant incident management policies or procedures have been followed), if they have been escalated and reported through required channels, and for reviewing how the incident was managed, to identify, develop or request support to develop or implement appropriate control measures to prevent reoccurrence.

Program/Service Managers might identify the incidents as requiring a specialist review or investigation. They can request an investigation for any incident through their yourHead and yourHead are responsible for seeking out the appropriate investigation team.

The Program/Service Manager (or delegate) is also responsible for ensuring all incidents have been recorded in QIS in a timely manner and for ensuring that the QIS FACT is closed after their review, also in a timely manner (as this data is collected and also supports **yourtown** understand things such as response times for incident management).

People and Culture

The Work Health and Safety team under the direction of the Head of People and Culture is responsible for contributing to reviewing compliance with safeguarding requirements that relate to physical environments, including workplaces and equipment.

Data and trends identified in children, young people or adult at risk WHS incidents reported via QIS must be presented to the Safeguarding Committee as required under the Committees terms of reference.

Practice Governance

yourtown Knowledge and Performance, Practice Governance team is responsible for retrospective investigation of the management of client or practice related incidents for quality improvement. See the Practice Governance Manual for further information.

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Data and trends related to client incidents captured in QIS must be reported at each Safeguarding Committee meeting and completed Practice Governance Investigations taken to the Practice Governance Review Panel.

5.7 Appropriate contact

5.7.1 Practice objective

All **yourtown** team members and clients must be made aware of and follow **yourtown** practice requirements relating to appropriate contact and what constitutes both appropriate and inappropriate contact/behaviours, including consequences.

Appropriate contact means the types of interactions and physical touch that is appropriate for the situation, this will be dependent on a number of factors including the persons role, the age and care needs of the young person, the type of activity or event.

5.7.2 Document/links relevant to this section

- [Code of Conduct Policy](#)
 - [Code of Conduct Sign-off Document](#)
- [Providers Code of Conduct](#)
- [Ethical Conduct and Practice Policy](#)
- [Managing Breaches of Ethical Practice in Virtual Services Procedure](#)
- [Appropriate Contact Guideline](#)
 - [yourtown Quick Guide to Appropriate Physical Contact](#)
 - [yourtown Quick Guide to Responding to Physical Violence](#)
- [Safeguarding Committee Terms of Reference](#)
- [Children Under the Supervision of yourtown Guideline](#)
- [Critical Incident Policy](#)

5.7.3 Requirements – line of sight

yourtown team members are not to be alone with children in a face-to-face private setting in the course of their work unless there is line of sight to an approved adult, a risk assessment for either the service/program/activity has been completed and 'working alone' has approved by a yourHead (or in an Emergency, an appropriate alternative People Leader/Manager).

Client Services

yourtown acknowledges that due to the nature and services of some of our Client Services programs, it will not always be possible, practical or appropriate to have more than one team member or another trusted adult present either physically or virtually and that due to the complexity of the clients we support, often their immediate safety and need will outweigh the potential risk for opportunity of harm that this scenario presents.

Wherever possible, team members responsible for working directly with clients should ensure they meet with clients in an open or visible space, or within the clear line of sight of another adult. When this cannot be achieved, then a risk assessment must be completed, and alternative risk mitigation measures can be approved and implemented to ensure child safety (see above). All risk assessments and should consider dignity of risk.

Safeguarding Committee

The Safeguarding Committee are required annually review any alternative measures allowing team members to be alone with children, young people or adults at risk, approved across **yourtown**, using the process to facilitate opportunities for enterprise-wide learning and development.



5.7.4 Responsibilities – line of sight

Property department

It is the responsibility of the property department to:

- consider line of sight requirements when sourcing **yourtown** locations, conducting works, planning and furnishing **yourtown** workplaces that are frequented by **yourtown** children, young people, adults and risk, families and the general public.
- work with Site/Service Managers to create a physical environment that as much as possible (within resource allocation) allows for the programs to implement controls to meet line of sight requirements e.g., installing viewing windows for spaces where child support is provided by **yourtown** team members, and in offices where team member may need to meet with young people alone.

People Leaders

Service/Program Managers are responsible for seeking approval for any alternative measures to line of sight by:

- recording the identified risk in a relevant risk register/assessment,
- including an appropriate mitigation strategy, and,
- obtaining approval by the relevant yourHead.

Where required/appropriate, the Site/Service Manager in consultation with the Property and Work, Health, and Safety teams, should (where appropriate) make adjustments to the layout of workplaces where there is an identified need for team members to meet one-to-one with children and young people, so that there is line of sight to an approved adult.

Service/Program Managers are responsible for reviewing current workplaces/sites against compliance with line-of-sight requirements.

5.7.5 Requirement – upholding ethical and professional standards

All team members should behave in a way that is consistent with the Ethical Conduct and Practice Policy, including:

- establishing professional boundaries with clients to ensure team members are acting in the best interests of the client and avoiding conflicts of interest,
- not contacting clients outside of working hours, unless it involves communicating with a client for a prescribed 'on-call' responsibility, and
- not making any personal disclosures to clients.

All team members are required to follow **yourtown**'s Appropriate Contact Guidelines when working with children and young people. The Guidelines acknowledge that there may be some scenarios where physical contact between team members and children and young people is required, and where that is the case, provides principles to guide appropriate contact. Team members should use verbal and visual directions, rather than touch, wherever possible.

5.7.6 Responsibilities - upholding ethical and professional standards

***yourtown** Team Members*

yourtown team members must ensure that their practice is consistent with the requirements of their role and **yourtown** policy. They must also ensure that client to client and client to team member physical contact is consistent with **yourtown** requirements i.e., finding the best way to redirect any physical contact initiated by clients or informing of **yourtown** expectations relating to physical contact.



5.7.7 Requirement – reporting inappropriate or unlawful behaviour

yourtown Team Members

All team members who observe any inappropriate, unlawful or questionable behaviour in the course of their work must report the behaviour.

Any instances of child abuse, harm or risk of harm, or neglect must be reported externally as per relevant [mandatory reporting](#) laws and [reportable conduct](#) schemes.

Inappropriate, unlawful, questionable behaviour or any reports of a worker who is alleged of having harmed a child must also be reported and investigated internally as outlined in **yourtown's** Reportable Conduct Scheme Policy and/or Critical Incident Policy.

Should a team member require guidance or support in reporting, they can consult with their Line Manager, or if the concern is about their Line Manager, the Head of the relevant Department.

Team members will always be supported by **yourtown** in their decision/requirement to report.

5.8 Responding to discrimination, bullying, harassment, and other inappropriate behaviours

NOTE: If you or anyone is in immediate danger, withdraw from a violent situation and call 000.

5.8.1 Practice objective

yourtown is committed to providing a workplace free from discrimination, bullying and harassment and other inappropriate workplace behaviours such violence and aggression, and illicit drug and alcohol use. **yourtown** has a zero-tolerance approach to such conduct by team members, clients, visitors or anyone accessing or engaging with **yourtown**.

yourtown aims to ensuring all members of the **yourtown** community know and understand what discrimination, racism, bullying, and harassment are and know how to make and follow **yourtown's** complaint processes and external avenues for complaint.

5.8.2 Document/links relevant to this section

- [yourtown Code of Conduct Policy](#)
 - [Code of Conduct – sign off](#)
- [Providers Code of Conduct Policy](#)
- [yourtown Feedback and Complaints Policy](#)
- [Client Complaint Investigation Policy](#)
- [Visitor Induction Procedure](#)
- [Workplace Bullying Prevention and Management Policy](#)
- [Workplace Bullying Prevention and Management Guidelines](#)
- [yourtown Bullying Prevention Policy and Procedure for Clients](#)
- [Kids Helpline – website - bullying](#)
- [Appropriate Contact Guideline](#)
 - [yourtown Quick Guide to Appropriate Physical Contact](#)
 - [yourtown Quick Guide to Responding to Physical Violence](#)

5.8.3 Requirements – reporting

All team members are required to be able to identify and report known or suspected discriminatory, bullying, racist or harassing behaviour that involves, children, young people, adults at risk, team members, or any other related stakeholders, occurring at a **yourtown** physical or virtual site, or while participating in a **yourtown** activity or program. These types of behaviours must be escalated to the appropriate Leader/Manager and/or yourHead and/or People and Culture.



All team members, in consultation with the Department Head, and Head of People and Culture, must consider whether the discriminatory, racist, bullying and/or harassing behaviours warrant any external reporting, including to appropriate authorities such as the police, eSafety Commission, or relevant anti-discrimination or human rights commissions.

Section 5.9 outlines responsibilities in relation to preventing and responding to discrimination, racism, bullying and harassment online, including ensuring that any online forums and social media sites are appropriately monitored and moderated, and that anyone who engages with **yourtown** online forums and social media are aware of our zero- tolerance approach to discrimination, racism, bullying and harassment.

All **yourtown** team members are also required to understand and follow the legal requirement for their state or territory for reporting inappropriate and [criminal conduct](#) by team members and third parties. For more information see **yourtown**'s Reportable Conduct Schemes Policy or the Responding to harm section of this document.

Team members will always be supported to report discrimination, bullying, harassment or inappropriate behaviours.

5.8.4 Responsibilities – reporting

yourtown Team Members

All team members are responsible for ensuring discrimination and inappropriate behaviours do not occur.

Team members must understand their responsibilities for the following, some have a **yourtown** requirement and others will be determined by the state or territory where the incident was disclosed or occurred. Team members should seek support from Leaders/Managers or Corporate Advisors and Specialists if they are unsure of next steps in responding to:

- external reporting obligations in the relevant jurisdictions, such as [mandatory reporting](#) obligations in relation to suspected child abuse, harm or risk of harm or neglect and [reportable conduct](#) schemes,
- [discrimination and harassment laws](#) in the relevant jurisdictions,
- internal complaints and investigations, and
- critical incident processes and procedures.

5.8.5 Requirement – of clients, visitors, others

All clients and visitors to **yourtown** are made aware of **yourtown**'s zero tolerance for any of these types of behaviours and agree to follow these requirements by signing their acknowledgement of this in relevant documents e.g., program intake and induction, residential agreements, visitor procedure sign in and **yourtown**'s provider code of conduct.

5.8.6 Responsibilities – supporting clients and others to report

Team members working directly with CYPAR must support:

- clients and others that engage with **yourtown** to bring forward any concerns about discrimination, racism, bullying and harassing behaviours by any team members or other clients, and
- clients and others that engage with **yourtown** with advice on appropriate ways to respond to discrimination, racism, bullying and harassment, and to report the behaviours should they choose to do so.

Team members should also independently report the matter to their Line Manager, or if the allegation is against their Line Manager, report the behaviour to People and Culture.



5.8.7 Requirement – responding to client behaviours

If you believe a client is being discriminatory towards, racist, bullying or harassing another client or **yourtown** team member/s, you should discuss as a matter of urgency an appropriate course of action with your Line Manager, or for client facing team members, with your Practice Supervisor.

If you believe a client is at risk of, or has been subjected to harm, or abuse by another client, you should discuss as a matter of urgency an appropriate course of action with your Line Manager, or for client facing team members, with your Practice Supervisor. This includes considering reporting requirements under [mandatory reporting](#) laws.

If the person's behaviour breaches any client agreements or codes of conduct, the person's continued participation in the program should be reviewed and risk assessed as promptly as possible to determine continued participation in the program/service possess a risk to others or if there are any alternative/safer engagement pathways.

5.8.8 Practice objective– violence and aggression

yourtown recognises that certain hazards, such as working with distressed or angry people, or working alone or at night, may give rise to an increased risk of violence, and that the most effective control measure is to eliminate or reduce any risks.

A range of security and work systems are in place at **yourtown** to reduce hazards and the risk of violent situations, and to keep staff safe in the event of a violent situation, including:

- providing security measures to prevent, restrict or control access to the workplace, particularly at night
- ensuring that team members required to work at night or in isolated locations do not work alone; where this is not possible/practicable, staff working alone on site (or at night) will have an on-call worker and Manager they can contact ensuring that, outside of business-as-usual practices and where team members might feel unsafe, processes are in place to ensure they can check in with Managers, especially when leaving work and arriving home late at night
- providing clearly visible CCTV in a number of common areas at workplace sites where team members are required to work alone or at night,
- providing team members in residential settings with a safe retreat to avoid violence and safety wrist watches to call for assistance in emergencies and when they do not have their mobile to hand
- displaying posters and instructions visibly in the workplace, or ensuring that client agreements are in place, which clearly note that violence and aggression is not tolerated, and that appropriate action will be taken to protect people from violence, and,
- having policies and procedures in place to prohibit and/or add alternative and consequences for alcohol and illicit drug use.

5.8.9 Requirement – safety training

yourtown provides ongoing staff development, supervision and support including training on de-escalation to all team members that work in client-facing roles. Training must be reviewed and updated every three years at a minimum.

5.8.10 Responsibilities – safety training

People Leaders

Line Managers are responsible for ensuring the outlined measures are in place, monitoring the ongoing functioning of security systems and ensuring that their teams are aware of these

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processes.

Line Managers, in consultation with their Department Head, are to identify any team members that require training in recognising signs of escalating behaviour, warning signs that may lead to assault, and de-escalation skills and strategies. Line Managers must ensure those team members have attended training as soon as possible.

The training modules include:

- course 1: De-Escalation
- course 2: How the body responds to stress, and
- course 3: Managing Client Aggression (subject to budget considerations).

Line Managers or Department Heads, in consultation with the Work, Health and Safety team, should develop emergency response plans in relation to violent behaviours, if such a plan has been identified as required through the Safeguarding Risk Register/Assessment. Where relevant to their role, Managers should ensure relevant team members complete de-escalation training.

yourtown Team Members

All team members must know and understand the emergency response plans for their service/site and/or location.

In the event of a violent situation, team members should follow the emergency response plan in place for their service or location.

Following an incident, **yourtown's** Workplace Incident Report Guidelines should be followed (a report must be put into QIS).

Team members must also notify your Manager and the Work, Health, and Safety Manager immediately if the incident results in a fatality or someone requiring immediate hospital treatment. If the incident is a notifiable incident under Work, Health and Safety legislation, the Work, Health, and Safety Manager will be required to notify the relevant state safety authorities.

5.8.11 Responsibilities – illicit drugs and alcohol use

yourtown Team Members

When/if a team member becomes aware of any client consuming alcohol and/or using prohibited drugs, or displaying the effects of having done so, at a **yourtown** service or workplace, they should be informed they cannot remain at site and should be assisted to safely return to their home.

If their home is a **yourtown** residential site or property, team members should follow the relevant procedure for that program/site. For example, San Miguel residents must comply with the San Miguel – Substance Use Procedure.

Following an incident, a review meeting should be scheduled between the client, their **yourtown** worker and the Line Manager to discuss the incident and clarify expectations prior to the client resuming participation in the program/service. The client should not be permitted to continue participation in their program/service without agreeing on a plan for the reduction or cessation of use.

5.9 Maintaining a safe online environment

5.9.1 Practice objective

Safe online environments actively promote safety and wellbeing, while minimising the opportunity for children, young people, and adults at risk of being harmed.



5.9.2 Documents relevant to this section

All team members are required to access to, and use of, **yourtown**'s online environments in line with the [Code of Conduct](#), [Mobile Device Policy](#), and the [Social Media Policy](#).

All team members must read and understand the following policies and procedures relating to online safety and are required to complete the following training courses:

- [Code of Conduct](#), and Code of Conduct online course
- [Information and Communications Technology \(ICT\) Acceptable Use Policy](#), and
- [Social Media Policy](#), and
- [Mobile Device Policy](#) (where team members use a **yourtown**, or personal mobile device for **yourtown** purposes).

All team members must comply with **yourtown**'s policies whether using **yourtown** or private devices for work.

Where relevant to the role or location, team members should also comply with the:

- [Retention and Disposal Schedule](#)
- [Virtual Services Child and Youth Risk Management Strategy](#)
- [Digital Self-Service Therapeutic Framework and Model of Care Guideline](#),
- [Content Creation Guidelines](#), and
- complete the Milton Corporate Compliance online course.

5.9.3 Commitment – promoting and delivering services safely online

yourtown helps children, young people, adults at risk, clients and users of its websites, online forums, social channels and other services in the online domain (e.g., apps like 'niggle') to understand online safety risks and empowers them to keep themselves safe online.

All client-facing team members are trained in providing advice on online safety, including on the appropriate use of social media, sharing information online, and sharing images.

5.9.4 Requirement – promoting and delivering services safety online

All team members working online with children, young people, and adults at risk must comply with the Ethical Code and Practice Policy in Client Service Delivery.

yourtown develops and delivers training and materials for children, young people, adults at risk, and website users in relation to online safety, and promotes the use of these training materials and content on our websites and across our social channels.

It is a **yourtown** requirement that the use of social media for 'Official Purposes' for public accounts⁹ is only completed by 'Authorised Users'. Authorised Users for Client Services brands (public accounts¹⁰):

- have social media responsibilities as part of their role profile
- are appointed by the Head of Marketing and Fundraising
- complete mandatory on-the-job training in content creation, scheduling, monitoring and reporting
- complete mandatory on-the-job training in all relevant social media scheduling and content creation platforms
- complete mandatory training in the Digital Content Therapeutic Frame and Model of Care, and Content Creation Guidelines.

⁹ Excludes private client groups and My Circle

¹⁰ Excludes private client groups

All content created and shared by Authorised Users to Client Services public social media accounts:

- must be proofed and approved by a minimum of two Marketing team members before scheduling
- when scheduled, must receive final sign off from the Content Strategy Manager, or an experienced Digital and Content Team staff member (in the absence of the Content Strategy Manager).

5.9.5 Responsibilities – delivering services safety online

People Leaders

Line Managers must ensure there are safe procedures, protocols, and guidelines for online activities.

Managers of a service/program within **yourtown** that provides services online, conducts activities online or hosts social media pages where external participants and users can engage with each other or publicly with **yourtown** team members, is responsible for ensuring that there are:

- internal practice and procedures in place to ensure the safety of online participants, including:
 - the service's guiding principles, which clearly articulate the service aims and are used to inform service operations, community standards, and its practice framework
 - mapping the user journey through the online forum with accompanying procedures and guidelines that inform the moderator team about how to safely support and manage these user activities
 - community standards for online forums based on the service's guiding principles, which outline expected user behaviour and any other relevant rules based on how the service's guiding principles
 - a framework of practice for online forums that outlines how the service is expected to benefit users and how the moderator team will help service users to achieve this benefit, including a clear list of moderation responsibilities and duties for the moderator team to help guide their practice in supporting the community
 - designing the online forum in such a way that it is safe, inclusive and accessible by people with different disabilities and is inclusive of people from different ages, genders, cultural backgrounds, neurotypes, sexualities, and spiritualities
 - policy and procedures for managing communities in online forums, such as moderator roles and duties, reviewing and approving user accounts, user activities and service boundaries, conflict management and resolution, safety and crisis escalation, referral pathways and Information Technology escalation
 - guidelines and workflows for reviewing and approving user-generated content, ensuring quality, relevance, and compliance with community standards
 - other policies such as data collection and record keeping, privacy and confidentiality to outline how user data will be collected, used, and protected
- Moderation protocols for **yourtown** online forums where external participants and users can engage with each other. At a minimum, this includes:
 - external behavioural guidelines in place for participants and users of the **yourtown** online forum that set out the rules and standards for engaging on the online forum.
- Users must be advised of the behavioural rules and standards contained in the guidelines in easy-to-understand language, and the guidelines must be easily accessible on the online forum. The guidelines should:



- o advise users that the online forum is monitored and moderated by **yourtown** team members.

5.9.6 Practice objective - safe and inclusive websites

yourtown aims to create safe, accessible and inclusive online environments, where users and participants from all backgrounds will feel safe, and be safe, in engaging about the issues they are facing.

Team members should, where possible, engage with CYPAR from a range of backgrounds when developing websites and website content, to ensure resources are safe, inclusive, accessible and respectful of diversity, and provide mechanisms for children, young people and adults at risk to provide ongoing feedback.

yourtown's websites must:

- adhere to the Digital Self-Service Therapeutic Framework and Model of Care, and the Digital Self-Service Content Creation Guidelines Responsibilities

People Leaders

The Department Head responsible for website or digital platform content should, where possible and appropriate, ensure that **yourtown** websites or digital platforms used for the purpose of engaging CYPAR contains:

- content that has been created in consultation with young people and/or people with lived experience of mental health concerns, abuse, and other forms of harm
- content that is inclusive and respects diversity, including Aboriginal and Torres Strait Islander people, people from culturally and linguistically diverse backgrounds, LGBTIQ+ communities and people of different neurotypes
- links to relevant support services that are appropriate to the target audience, and
- subtitles for video and audio content.

Clinical-based content describes content that is either psychological in nature or that could reasonably cause physical or psychological harm. In addition to the above, clinical-based content on **yourtown**'s website must be reviewed and approved by clinicians with relevant tertiary qualifications and expertise in psychology or a related discipline.

Content created or provided by a young person, or other site user, must follow the content creation process outlined in the Kids Helpline Digital Content Creation Process

5.9.7 Practice objective - social media

Social media includes any websites and applications that enable users to create and share content or to participate in social networking. **yourtown** has a strong presence on a range of social media platforms and maintains a diligent approach to ensuring Duty of Care online.

5.9.8 Requirements – social media

Only authorised staff members are to use social media for 'Official purposes' and must adhere to:

- the Digital Self-Service Therapeutic Framework and Model of care,
- the Digital Self-Service Content Creation Guidelines
- the Social Media Policy, and
- the Ethical Code and Practice Policy in Client Service Delivery.

Social media sites, including the comment sections must be monitored at regular intervals within each 24-hour period, for example checks completed at 8am and 8pm. Moderators should



remove any harmful content or comments posted by users as soon as possible, and no later than 24 hours of it being posted.

Disclosures relating to all forms of abuse, harm, risk of harm or neglect that are received via social media must be responded to in accordance with section 5.10 the SiPP and [mandatory reporting](#) requirements, where relevant. The person responsible for monitoring the social media site must reach out to the person that has disclosed information to provide support as soon as possible, and then escalate as required.

5.9.9 Requirements - photos, videos, and audio recording

yourtown Team Members and Visiting Professionals

Team members or providers must never take or publish an image or video of another person without their consent.

With informed consent, team members, and approved professionals are permitted to take photos, videos and audio recordings of children and young people, adults at risk and other clients at a **yourtown** physical or virtual site for the following purposes only:

- identification cards and records
- media, marketing, and promotion, including **yourtown**'s social media and websites
- significant events, or moments at services and programs, or as part of consultations or research, learning and development (counselling), tracking or recording therapeutic, development or learning progress (counselling and child programs) and
- work, health and safety investigations and critical incident reporting and investigations.

Personal electronic devices (e.g., personal mobile phones) must not be used for the taking, sending, storing/recording or writing of client information including photos, recordings or videos. For further information about this see yourtown's Mobile Device Use Policy.

Clients, families, friends and other visitors

Families and friends visiting clients residing at a residential service are not captured by section 5.6 as it relates to the specific client and their children being visited. Visitors of clients in residential services are not permitted to take or share photos of team members, other residents, or their children without the other person's consent.

How is permission obtained?

All team members and approved visitors are permitted to take photos, videos, or audio recordings of a client, if that client (and their parent/ legal guardian) has provided informed consent, only as follows:

- **in writing**, using the Publication of Images and Work Consent Form. Clients must be provided with a copy of the Publication of Images and Work Information Sheet before providing their consent.
- **if the client is under 18**, a parent/legal guardian must provide consent in writing on the Publication of Images and Work Consent Form (Parent/Guardian), and
- where the client is a Social Enterprise Client, or young parent at a residential service and they are under the age of 18 (and not younger than 16), they may provide consent in writing without parental/guardian consent if they understand what they are consenting to, and the consent is witnessed by a team member.

Photos or videos must not be used by **yourtown** team members for any other purposes than those consented to by the client.

Photos, videos, or audio recordings taken online of children under the age of 18 are not permitted without verifiable written consent from a parent/legal guardian.



What should the client be told?

It must be clearly communicated to the client (and the parent or legal guardian):

- how the photos or videos will be used, including where, how, for how long the image will be available for use by **yourtown**
- whether it will be used on social media and internet sites where **yourtown** will not be able to control further use and distribution, and
- that the client can withdraw their consent at any time.

Clients should be:

- provided with a **contact email** and **name of a person** to contact should they wish to withdraw their consent, and
- advised that, because of the permanency of the internet, withdrawal of consent may not always lead to the removal of an image online.

5.9.10 Responsibilities – photos, videos and audio recordings

People Leaders

The Line Manager of the service/program or workplace where the photos, videos or audio recordings of clients will be taken must be consulted prior to any photos or videos being taken.

The Line Manager is responsible for ensuring that any clients or participants have completed and returned their consent form relating to the taking and use of photos, videos, and audio recordings. Managers can delegate this responsibility. Appropriate electronic records must be kept using an approved and secure record keeping system such as CIS and paper records must be stored in compliance with **yourtown's** Retention and Disposal Schedule.

yourtown Team Members

All team members involved in an activity where photos, videos and/or audio recordings are being taken are responsible for scanning the environment to ensure there are no accidental breaches of privacy or confidentiality. This could include, for example, that no personal information is on display, and that media are not in proximity of counsellors who are undertaking sessions with clients when filming.

Team members must not let visitors at **yourtown** workplaces or sites to take photos or videos unless:

- it is for one of the approved purposes
- has been agreed by the relevant Line Manager at **yourtown**
- written consent has been obtained from clients or participants using the consent form, and
- any approved **yourtown** visitor induction process is adhered to.

External photographers brought in by **yourtown** must be supervised at all times and are not to be left unsupervised with children.

All team members admitting third-party providers, or visitors onsite, must advise them of **yourtown's** policy in relation to the taking and use of photos, videos and audio recordings. Written contracts with third-party providers should include a relevant contract clause where appropriate.

yourtown Community

Where practicable, clients or participants in **yourtown** programs, services and projects, and family members or friends of clients, should be discouraged from taking or sharing photos of other clients or participants.

5.9.11 Responsibilities – annual safeguarding audit

People Leaders

yourtown routinely monitors the online environment, reporting and responding to breaches of its Code of Conduct and safeguarding policies in accordance with our disciplinary, complaint handling and other relevant processes.

Learning and Development Consultant is responsible for:

- ensure all team members have completed the mandatory training relating to online safety
- provide a report on training compliance as part of the Safeguarding Audit

Line Managers are responsible for:

- ensuring their team members complete the mandatory training

Department Heads responsible for providing a report on any:

- complaints received in relation to online conduct
- breaches in relation to online conduct

5.10 Responding to abuse, harm, risk of harm and neglect

5.10.1 Practice objective

At **yourtown**, safety, welfare and wellbeing are central to our values, actions and services, and in how we work and engage with CYPAR.

To meet the highest standards of care (and duty of care) for people that are experiencing harm, or may be at risk of harm, **yourtown** has a range of policies, procedures, and other measures in place to ensure:

- our services and activities are designed to prevent harm (see section 5.6), promote safety and self-advocacy (see section 5.4) and provide information for clients about how to access independent advocates, and make complaints,
- age-appropriate and trauma-responsive approaches are used when responding to concerns, disclosures and allegations relating to risk of harm (see section 5.10).

Safeguarding and Duty of Care are closely connected. To understand the practice objective of this section it is important that the reader understands the relationship (similarities and differences) between these two terms.

Duty of care is a professionals' responsibility to promote safety and wellbeing of others and this responsibility should underpin their entire practice.

*Safeguarding is a set of policies, procedures, guidelines or actions and is a part of the wider responsibility of duty of care. Safeguarding is the measures **yourtown** takes to keep CYPAR safe.*

5.10.2 Documents/links relevant to this section

- [Australian Privacy Principles](#)

All team members are required to be familiar with additional policies and procedures that support in responding to harm. All team members must read and understand this Policy, and the following **yourtown** policies and procedures:

- [Practice Principles for Reporting Child Sexual Abuse/Exploitation](#)
- [Organisational Practice Framework SharePoint page](#)
 - Specialist Practice Resources (Child Sexual Abuse, Child Sexual Exploitation; Children and young people who engage in harmful sexual behaviours)

- [Reporting Child Sexual Abuse and Exploitation to Queensland Police Services](#)
- [Practice Governance Manual](#)
- [Reportable Conduct Scheme Policy](#)
- [Ethical Conduct and Practice Policy](#)
- [Duty of Care Position Statement](#)
- [Duty of Care Flowchart](#), and
- where relevant, any client safety and Duty of Care procedures for their particular program or service such as the:
 - [Counselling Centre Duty of Care Response to Risk Procedure](#)

5.10.3 Requirements

yourtown requires that all team members:

- be appropriately qualified and screened in accordance with legal requirements (see section 5.1)
- have the knowledge, skills and training to identify harm and understand their obligations relating to Duty of Care
- apply due care and diligence in decision making in accordance with the Duty of Care information guide for the particular service (including, for example, the On-Site Duty of Care Information Guide - Working with 'At Risk' Clients Procedure, and the Duty of Care Flowchart)
- act ethically and responsibly with a high level of accountability, consistent with the Code of Conduct Policy and the Ethical Conduct and Practice Policy and professional accreditation codes of conduct relevant to specific roles (understanding that where there are any conflicts, team members should refer back to **yourtown** policy and seek out team leaders for guidance)
- comply with [mandatory reporting](#) and [reportable conduct/criminal code](#) obligations, and
- apply good reporting practices beyond what is required by law, (see sections 5.10)

Recognising and responding

It is a **yourtown** requirement that all team members know how to recognise and respond to the signs of harm, abuse and neglect. **yourtown** provides training to team members to equip them to:

- be aware of and understand the nature of different forms of harm, abuse and neglect
- recognise signs and indicators of harm and risk of harm
- understand the nature and impact of harm, and abuse
- understand the nature, factors, and impact of institutional harm
- identify risk factors of harm, including child abuse, such as grooming behaviours; use of power over; cumulative harm;
- understand, identify harmful behaviours by a children and young people towards other children and young people, and
- recognise the risk factors that contribute to harm toward adults at risk, such as abuse of power; and exploitation, with a focus on those who are at increased risk.

Training

All team members must complete the following training courses in relation to recognising and responding to harm:

- Safeguarding at **yourtown** online course
- Safeguarding Module 1: Understanding Abuse
- Safeguarding Module 2: Recognising and Responding
- Safeguarding Module 3: Reporting Requirements, and



- Reporting Child Sexual Abuse and Exploitation online course.
- In addition, team members may complete additional evidence-based training/professional development that is consistent with their role e.g., foundation modules 1- 7 Child Sexual Abuse and Exploitation.

5.10.4 Responsibilities

Senior Practice Supervisors and Principal Advisors

yourtown employs a collaborative and consultative approach to managing Duty of Care situations. This means, team members should discuss concerns about client safety and wellbeing with their Line Manager, and/or Senior/Practice Supervisor. Where specialist advice is required, in complex matters, contact the:

- Principal Advisor (Sexual Abuse & Exploitation), or
- Clinical Governance Specialist
- follow all procedures relevant to your line area, for example:
 - On-Site Duty of Care Information – Working with 'At Risk' Clients Procedure
 - Site Duty of Care Information Guide
 - Site Client Safety Plan Information Guide
 - Counselling Centre – Duty of Care and Response to Risk Procedure
 - Virtual Services Duty of Care Guide.

People Leaders

Line Managers in client-facing areas must ensure all their team members have the skills and knowledge to identify potential signs of harm, including abuse and neglect, both in-person, and in virtual contexts. This can be achieved through strong recruitment standards, close and ongoing supervision, and through the support of appropriate evidence based professional development/training.

yourtown Team Members

When someone is at risk of harm all team members must respond appropriately, and in a timely manner. In situations where someone is identified as being at risk of harm, team members must know how to:

- know what reporting is required by law in the relevant state/territory
- identify when there is a Duty of Care concern, including when someone is at risk of harm from others to others, or to themselves
- assess the level of risk, and
- implement and follow relevant Policies and Procedures.

5.10.5 Practice objective - responding quickly and appropriately

NOTE: Call 000 if you have reason to believe anyone is at immediate risk of significant harm/ is in danger

yourtown has zero tolerance for inaction in responding to harm, including abuse or suspected abuse.

At **yourtown**, there is no wrong door for anyone to disclose or report any form of abuse, harm or risk of harm, or neglect whether it occurred at a **yourtown** site or outside of **yourtown**.

5.10.6 Requirement - responding quickly and appropriately

yourtown Team Members

yourtown provides and requires all team members be trained in:

- the skills and knowledge to appropriately respond to and support children, young people, and adults at risk in bringing forward concerns, disclosures and allegations of harm
- awareness, and understanding of their reporting obligations under federal, state and territory laws and other response options, including:
 - [mandatory reporting](#) to child protection authorities and/or the police
 - reporting [criminal](#) behaviour to police,
 - [reportable conduct](#) schemes (refer to the Reportable Conduct Scheme Policy), and
 - reporting to the eSafety Commission
- an understanding of the balance of severity and imminency when deciding on the appropriate reporting response
- an understanding of the importance of active bystander interventions and using professional decision making in relation to abuse and neglect

Team members may also need to be aware of their responsibilities specifically related to clauses or requirements outlined in contract agreements or MoU's with other services relating to emergencies or other incidents when **yourtown** is the referred/provider service.

People Leaders

yourtown requires that Line Managers must ensure:

- All their team members have the skills and knowledge to respond to reports and disclosures in relation to harm, both in-person and in virtual contexts. This can be achieved through strong recruitment standards, close and ongoing supervision, as well as clear and effective practice guidance at a service level.
- There are clear business processes and procedures in place to support team members to respond to reports or disclosures of harm, including external and internal reporting and record keeping, that are relevant and appropriate to the nature of their service, program, or activity.

5.10.7 Requirement - disclosures of harm

Team members should be confident in their ability to respond appropriately to disclosures and reports relating to harm, including abuse, and neglect, and should understand their duties and obligations.

If team members receive a disclosure, notification or allegation relating to harm, whether this occurred at a **yourtown** site or outside of **yourtown**, they should:

- listen to the person without interrupting or expressing alarm
- as much as possible, be aware of the person's circumstances, especially those that increase their vulnerability
- gather key facts, including names, dates, and contact details (if possible)
- not dismiss the incident, even if they are unsure whether the person is making a disclosure or not, or not sure if the person/disclosure is reliable
- tell the person that they have done the right thing in disclosing to them and acknowledge their courage in disclosing
- assure the person that being a victim of harm is not their fault
- explain to the person that you must report the disclosure and let them know what you will do next (if possible)
- tell the person **yourtown** is available to provide support to them, if required
- consider and meet all external and internal reporting obligations.

If there are any disclosures in relation to harm caused at or by yourtown escalate immediately to your Line Manager and refer to the Reportable Conduct Schemes Policy.

Once a report has been made to the relevant authority, team members must:

- notify their Line Manager of the report that has been made (if they were not already involved)
- maintain appropriate confidentiality, with due regard to the Australian Privacy Principles
- consider additional supports that might be helpful for the client or their family, for example a cultural healing service, a medical service, family support service or specialist counselling support service
- with permission, take a care team approach with a person's other services and develop safety plans and educate around protective actions and behaviours, and
- encourage reconnection for ongoing support.

5.10.8 Requirement – external reporting

yourtown and individuals have external reporting obligations that differ depending on which state or territory the disclosure was made or where the harm, abuse, neglect occurred.

All team members are responsible for ensuring they have received training and/or know where to go to find requirements and obligations for reporting harm, abuse and neglect, outside of **yourtown**, and their professional and individual responsibilities.

yourtown is required to follow [mandatory reporting](#) laws, [criminal code/laws](#) and [reportable conduct](#) schemes, which all have reporting requirements.

When an allegation involves a **yourtown** team member

If you are dealing with a situation that involves an allegation of abuse, harm, risk of harm, or neglect in relation to any **yourtown** team members, team members must:

- support the person who has or is experiencing the abuse, harm, risk of harm or neglect and
- immediately advise your Line Manager (or another People leader if not appropriate), adhere to requirements under the relevant [reportable conduct](#) schemes or [criminal code](#) for their state or territory (refer to the Reportable Conduct Scheme Policy) and follow the appropriate internal complaint and investigation process.

5.11 Responding appropriately to risk of suicide, self-injury, or harm to others

5.11.1 Practice objective

Due to the nature of **yourtown**'s services and activities, team members may be required to respond to emergency and other situations where an individual is assessed as being at risk of causing harm to themselves or others, including suicide-related thoughts and behaviours, self-injury (or intent to self-harm), other psychiatric emergencies, as well as intent to harm others through violence or abuse.

5.11.2 Document/links relevant to this section

- [yourtown Duty of Care statement](#)
- [On-Site Duty of Care Information - Working with 'At Risk' Clients Procedure](#)
- [Site Duty of Care Report Form](#)
- [Site Duty of Care Information Guide Form](#)
- [Duty of Care Information Guide Form](#)
- [Duty of Care Cases Handover with Supervisors Procedure](#)
- [Duty of Care and Call Procedure – Skype Calls](#)
- [Counselling Centre - Duty of Care and Response to Risk Procedure,](#)



- Contingent Psychology Service – Duty of Care Guideline.

External

- National Guidelines for Australian Mental Health Call Service Providers_v1.0

5.11.3 Responsibilities – responding in a crisis

People Leaders

Line Managers must ensure that:

- all their team members have the skills and knowledge to respond to risk and threats of harm. This can be achieved through strong recruitment standards, support, including training and ongoing supervision, as well as clear and effective practice guidance at a service level, and
- there are clear business processes and procedures in place for their team members to respond to safeguarding risks and concerns that are relevant to the nature of their service, programs, or activities.

yourtown Team Members

All team members working directly with clients should know how to respond when it is identified that there is a serious and imminent threat to the life or the health of a person, when working face to face, talking to a person over the phone, via webchat or via email counselling.

NOTE: When calling 000, provide all relevant information regarding risk, identity, and the location of the at-risk person. Emergency services will determine whether to intervene based on the information provided.

When speaking with a client and you identify a serious and imminent threat to the life or health of a person, team members should:

- encourage the person to call emergency services via 000 for immediate support if they can
- encourage them to provide their location and/or contact information and more detailed relevant risk assessment information if the person is unable or unwilling to contact emergency services themselves, and
- stay with the person, or remain on the phone (if possible), until help arrives (unless directed otherwise by emergency services).

All team members must alert their Line Manager of any safeguarding concerns as soon as possible and should seek advice from their Line Manager or Practice Supervisor if they are in doubt over the best course of action.

5.11.4 Requirement – duty of care

yourtown Team Members

In addition to this Policy, all team members must read and understand all policies and procedures relevant to their line area and work responsibility (relevant documents above).

All Duty of Care situations must be logged in CIS (or where **yourtown** is a contracted service, the relevant system required under the contract), and team members must be trained in how to complete a safety plan and duty of care entry in CIS correctly.

5.11.5 Responsibilities – annual safeguarding audit

People Leaders

Clinical Governance Specialist is responsible for providing a summary of key areas for improvement based on duty of care file reviews and audits from the Practice Supervisor.



Head of People and Culture is responsible for providing a report on team member compliance with mandatory training requirements.

Line Managers are responsible for ensuring team member compliance with duty of care obligations.

Practice Supervisor is responsible for providing the Clinical Governance Specialist with a summary of key areas for improvement based on duty of care file reviews and audits

Learning and Development Consultant is responsible for ensuring compliance with the mandatory training requirements outlined in section 5.10 and providing a report on training compliance as part of the Annual Safeguarding Audit.

5.12 Working with safe third-party providers and services

5.12.1 Practice objective

yourtown aims to ensure every external or contracted service, organisation, business, sole trader, agency, supplier, provider, and individual they work with or engage is safe, and have acceptable child safe practices. **yourtown** recognises third party providers as a potential significant safeguarding risk and endeavours to put processes and controls in place to ensure that risks are mitigated, known, balanced and/or accepted by the organisation.

yourtown has processes in place for all third-party providers:

- who are suppliers onboarded through the Procurement Department
- who are individual contractors onboarded through People and Culture
- who are agencies we refer client to via Infoxchange
- who are onboarded by Service/Site/Program Managers and are either paid, unpaid or have reciprocal arrangements or agreements.

Safeguarding is only one aspect of what is required to be considered when **yourtown** is looking to work with third party providers.

5.12.2 Documents related to this section

- [Visitor Induction Procedure](#)
 - and relevant site or programs specific visitor processes
- [Third-Party Providers and Safeguarding Guideline](#)
 - [Quick guide to Onboarding Third Party Providers \(Safeguarding\), Safeguarding Risk Assessment Checklist, Visitor Induction Checklist and Examples](#)
- [Purchasing Policy](#)
- [Purchasing Procedure](#)
- [Procurement Procedure](#)
- Contingent Psychology Service – Duty of Care Guideline

5.12.3 Requirements

The **yourtown** [Visitor Induction Procedure](#) outlines the process that must be followed for all non **yourtown** employee's visiting **yourtown** in a professional capacity. It aligns with this policy and **yourtown's** requirements for:

- visitors having no access to children, young people or adults at risk (CYPAR)
- visitors have direct access to CYPAR
- visitors have indirect access to CYPAR

The **yourtown** Third-Party Provider Guideline has been developed to ensure the safety of CYPAR. It provides a guide on things that should be considered and provides team members with the tools required to understand and extend relevant safeguarding obligations.



At a minimum, all third-party providers **yourtown** works with that will be working directly with **yourtown** clients who are under 18 years old, must provide evidence that:

- they have implemented the National Child Safe Principles, have child safe policies, are able to comply with this Policy, and/or agree to the **yourtown** Provider Code of Conduct.
- all their staff working directly with clients aged under 18 years have had their Working with Children Check verified for accuracy before commencing the service or activity.

Most of our Third-Party Providers will be required to complete agreements and are likely to be a lot more complex than just the minimum requirements outlined above, requiring consideration of Procurement and People and Culture (Properties, WHS, Talent Acquisition) requirements.

5.12.4 Responsibilities

People Leaders

The Procurement Manager is responsible for maintaining the Preferred Supplier Register and advising on and/or leading all other legal contract requirements for onboarding paid providers.

yourtown Team Members

All team members are responsible for following any **yourtown** approved visitor induction process when inviting and escorting any visitors (including third party providers) at any of **yourtown**'s workplaces or services.

All team members are responsible for following **yourtown** processes that are in place to ensure **yourtown** only partners with and refers clients to safe third-party providers.

Before commencing work with any third-party provider, or referring a client to another third-party provider, if the third-party provider is not listed in the Infoxchange Service Directory **or if the service will not be attending site under the Visitor Procedure**, then team members must:

- ensure they are familiar with **yourtown's** minimum safeguarding controls, **yourtown** safeguarding risk appetite, Third-Party Providers and Safeguarding Guideline, site/program storage of information/records for third party providers and who the control owner is for any risk mitigation
- undertake or update a risk assessment that considers **yourtown** safeguarding requirements in relation to working with, or referring a client to third party providers
- apply appropriate safeguarding requirements and obligations, in consultation with their Service/Program Manager, and
- be aware of purchasing policies and procedures, procurement policy, contract management and administration, financial delegations and other finance related policies and procedures.

As part of standard practice, all team members should ensure clients are aware of their rights to and encourage self – advocacy and provide clients with information on how and where they can report any concerns about their safety, which may include making a complaint to **yourtown**, providing feedback to **yourtown** about how safe they felt with the third-party provider and/or contacting the police.

All team members involved in drafting and negotiating contracts, Memorandums of Understanding (MOUs), and other forms of written agreements with third party providers are responsible for ensuring the written agreements contain appropriate safeguarding conditions and obligations.

Team members should contact the Procurement team in relation to any questions or advice they have in relation to third-party providers, writing MOU's or contracts/agreements.

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5.12.5 Responsibilities – safeguarding audit

People Leaders

Procurement is responsible for:

- reviewing team member usage of the Supplier Register
- reviewing contracts that have been finalised during the audit period and providing information on the compliance rate of including the appropriate safeguarding clauses
- reporting to the Safeguarding Committee:
 - the number and nature of any complaints received by **yourtown** in relation to its third-party suppliers, and
 - the number and nature of any critical incidents or complaints received about **yourtown's** third party suppliers.

Clinical Governance Specialist is responsible for reporting to the Safeguarding Committee:

- the number and nature of any complaints received by **yourtown** in relation to its third-party providers, and
- the number and nature of any critical incidents or complaints received about **yourtown's** third party providers.

5.13 External reporting requirements

5.13.1 Practice objective

At **yourtown** we aim to have appropriate support and policies in place to ensure that team members know what is expected and how to address any disclosures, concerns, or complaints, whether or not the law requires reporting.

5.13.2 Documents related to this section

- [Reportable Conducts Schemes Policy](#) – see this document for further information on reportable conduct, mandatory reporting and criminal code obligations, requirements and responsibilities
- [Practice Principles for Reporting Child Sexual Abuse/Exploitation](#)
- Duty of Care documents ([see 5.11.2](#))
- [Feedback and Complaints Policy](#)
 - [Privacy Notice – Feedback and Complaints](#)
- [Complaints Handling Guideline](#)
- [Client Complaint Investigation Policy](#)
- [Practice Governance Manual](#)

5.13.3 Requirements

yourtown organisation, **yourtown** team members and individuals (over 18 years) have a number of external reporting obligations they are legally required to follow. All team members must be familiar with these requirements and know where to seek advice, direction and further information on these obligations (both internally and externally). For further information including required and recommended training, see documents relevant to this section.

5.14 Annual safeguarding audit

5.14.1 Practice objective

yourtown conducts periodic audits and assurance activities of safeguarding activities and processes, including of this policy. This provides assurance to the Safeguarding Committee, Executive and Board that safeguarding practices have been implemented and embedded, and that the organisation maintains adequate safeguarding maturity. The nature and frequency



of assurance activities are determined through annual internal audit planning activities, endorsed by the Board Finance and Risk Committee (FRC).

5.14.2 Documents/links relevant to this section

- [Retention and Disposal Schedule](#)
- [Safeguarding Committee Terms of Reference](#)
- [Accreditation SharePoint page](#)
- [Financial and Risk Committee Charter](#)
- [National Catholic Safeguarding Standards](#)

5.14.3 Requirement

yourtown is required by the National Catholic Safeguarding Standards (NCSS) to complete periodic internal safeguarding audits/self-assessments.

5.14.4 Responsibilities

Enterprise Risk and Compliance (ER&C)

The ER&C Manager is responsible for, in consultation with the Safeguarding Committee and other relevant team members, developing an annual internal audit plan that ensures an appropriate nature and frequency of safeguarding assurance activities. The ER&C Manager is also responsible for seeking FRC endorsement for the plan.

6 record keeping

6.7.1 Requirements

yourtown has clear information sharing and record keeping policies and procedures and it is required that these are consistent with the National Principles for Child Safe Organisations and **yourtown**'s Clinical Governance Standards. Any **yourtown** policy or procedure in relation to information sharing or record keeping must ensure that:

- complete and accurate records are created and maintained for all incidents, complaints, responses, decisions, and outcomes
- records are created at the time of, or as soon as practicable following an incident, complaint, response, or decision
- records are titled, organised, and filed logically in accordance with **yourtown**'s Records Management and Titling Guidelines
- a master copy of each record is formally maintained to ensure duplicate records or multiple copies of the same record are kept to a minimum
- records are maintained and disposed of in accordance with legislative and statutory requirements, and in accordance with **yourtown**'s Retention and Disposal Schedule
- information and/or records are treated as confidential, and records are appropriately secured in accordance with **yourtown**'s Information Technology Security Policy.
- sharing or distribution of information and/or records is restricted to nominated team members and is conducted in accordance with relevant legislative and statutory requirements, and
- an individual's right to access, amend or annotate records about themselves are fully recognised.

6.7.2 Responsibilities

Records Function

The Records Function is responsible for ensuring that there are policies and/or procedures in place on information sharing and record keeping in relation to all aspects of safeguarding, including duty of care situations, other critical incidents, and complaints.

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7 consequences and breaches

yourtown values trust, learning, transparency and accountability. People Leaders and team members who do not follow the requirements or intent of this policy will be asked to remediate their actions, realign and work consistently with the SiPP. Persistently, or intentionally failing to align with our documented processes may result in disciplinary action up to and including termination of employment.

All breaches of the SiPP must be reported to the relevant Manager and the Enterprise Risk and Compliance Manager as soon as possible. Depending on the nature of the breach, non-compliance with the SiPP may result in a direction under the **yourtown** Code of Conduct Policy, including dismissal, or criminal charges.

8 terms and definitions

Term	Definition
Adult at Risk	An adult at risk is defined as any person aged 18 years and over who is by reason of mental health issues, learning or physical disability, sensory impairment, age or illness, unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation.
Advocates and allies	<i>Advocate and allies means someone who speaks up for or is supportive of or is a safe person for a person or group of people or cause.</i>
Approved Adult	An adult with the appropriate skills, knowledge, and experience for working with children and adults at risk. They must also have undergone the relevant checks required in the state or territory, including a satisfactory National Criminal History Check and Working with Children Check (WWCC). An approved adult could also be a trusted professional, such as a teacher, counsellor, or health practitioner. In a yourtown residential setting, an approved adult can include a parent or legal guardian of a child or young person, or adult family member.
Bullying	Bullying is hurtful behaviour that is; done on purpose; repeated over time; and involves an imbalance of power. Bullying behaviours can be physical, verbal, social and can take place in the physical world or digitally (cyberbullying).
Child	'Child' refers to anyone under the age of 18, consistent with the Convention on the Rights of the Child (CRC) as well as the Commonwealth Family Law Act 1975.
Child Abuse	Child abuse is a form of 'harm'. Child abuse can be a single incident or several incidents that take place over time. There are four types of child abuse: physical; sexual; emotional; and neglect.
	Physical abuse
	Physical abuse happens when a child has been hurt or injured, and it is not an accident. Physical abuse does not always leave visible marks or injuries. Physical abuse can include hitting; shaking; choking; smothering; throwing; burning; biting; poisoning, and; using physical restraints.
	Sexual abuse
	Child sexual abuse occurs when an adult, or a more powerful child or adolescent (including a sibling) involves a child in sexual activity. This may involve physical contact between the alleged abuser/offender and child, or no physical contact between the alleged abuser/offender and the child. Sexual abuse can cause emotional, psychological and/or physical harm.

Term	Definition
	<p>The intended use of power and control, secrecy and silencing, and the distortion of adult-child relationships to coerce the child into compliance with sexual activity are key factors in the sexual abuse of children. Behaviours that are sexually abusive to a child include:</p> <ul style="list-style-type: none"> • making sexually suggestive, obscene comments made in person, by telephone, or through social media to a child • speaking to a child about graphic sexual matters • using technology to send messages with obscene or sexual content or images to a child (this can include 'sexting') • persistent, unwanted intrusion of a child's personal space that increase the child's vulnerability to sexual abuse • showing pornographic material including films, magazines, photographs or internet websites to a child • using the internet or social media technologies to lure a child for sexual purposes. • forcing a child to watch a sexual act • covertly or overtly watching, taking photographs or electronically recording a child in bathrooms, bedrooms or toilets, or in various states on undress • being inappropriately nude, partially nude, disrobing in front of a child, 'flashing' or exposing a sexual body part to a child • engaging in a sexual act in the presence of a child • kissing or holding a child in a sexual manner • fondling a child's body in a sexual manner or asking the child to fondle another person's body • engaging a child in acts of child prostitution • masturbating while child observes, observing a child masturbate, engaging in mutual masturbation with a child including child masturbating another child/person. • undertaking clothed or unclothed dry intercourse (a person rubbing their genitals against the child's genitals and/or anal areas) • undertaking fellatio (oral to genital contact for males) • undertaking cunnilingus (oral to genital contact for females), and • using an object to penetrate the vagina or anus, or penile or digital penetrations.
	<p>Emotional abuse</p>
	<p>Emotional abuse happens when a child is treated in a way that negatively impacts their social, emotional, or intellectual development. Emotional abuse can be caused by:</p> <ul style="list-style-type: none"> • rejection • name calling, teasing or bullying • yelling • criticism • isolation or locking a child up for extended periods, and • exposure to domestic and family violence. • Experiencing domestic and family violence can also lead to emotional harm. A child who experiences violence at home is at greater risk of not having their basic

Term	Definition
	<p>needs met, including their protection and care needs. Domestic and family violence can:</p> <ul style="list-style-type: none"> • affect a child's emotional wellbeing and development • teach them that violence is a solution to problems, and cause post-traumatic stress disorder.
	<p>Neglect</p> <p>Neglect is a form of 'harm'. Neglect happens when a child's basic needs are not met, affecting their health and development. Basic needs include food; housing and; clean-living conditions health care; adequate clothing; personal hygiene, and; adequate supervision.</p>
Child exploitation	Behaviour that makes it easier for an offender to procure a child for sexual activity. This can occur in person or through electronic equipment. For example, an offender might build a relationship of trust with the child, and then seek to sexualise that relationship by encouraging romantic feelings or exposing the child to sexual concepts through pornography.
Client	<p><i>Client means any individual or family who is engaging or has made steps to engage with a yourtown service or program (for the purpose of safeguarding, yourtown social enterprise trainees are defined as clients, however they must also comply with certain requirements of a yourtown team member.)</i></p> <p>For the purposes of the SiPP, client is also taken to mean anyone that is engaging with a yourtown service or program, as well as participants in yourtown engagement activities, employment services and social enterprise activities.</p>
Compliance	<i>Compliance means following or meeting a rule or requirement.</i>
Conjunction	<i>Conjunction means at the join of two things, or two things happening at the same time that work together.</i>
Consolidate	<i>Consolidates means to put a number of things together to make them stronger.</i>
Contact with children, young people and vulnerable adults	Contact with means working on an activity or in a position that involves or may involve direct (including online) contact or indirect contact (such as use of images).
Complaint	Any matter ranging from a general expression of dissatisfaction with a service or program provided by yourtown , a particular experience with a person or persons involved with yourtown , an allegation of misconduct, policy non-compliance, harm, abuse or exploitation or an issue with the complaints management process. ¹¹
Contractor	<p>The individuals engaged to perform specific services under a contract, that include:</p> <ul style="list-style-type: none"> • specified team members nominated in a head agreement with an intermediary company (the contractor) to which payment is made; or • if the person performing the service is the service provider, he/she is an individual contractor.
Criminal Code/Laws	Every state and territory have laws that protect children from harm and those that are criminal offences. All adults are required to report crimes against children. For more information on criminal offences relating to the protection of children for each state or

¹¹ Adapted from Complaint Handling Guide: Upholding the rights of children and young people (2019), Commonwealth of Australia, Department of the Prime Minister and Cabinet

Term	Definition
	territory and to understand your responsibilities for reporting observed or disclosed criminal offences against children go here .
Dignity of Risk	<p>Dignity of risk asserts that individuals have the right to make choices about their own lives, even if those choices involve some level of risk. It recognises that risk-taking is a fundamental aspect of living a fulfilling life and promotes the idea that individuals should have autonomy and control over their decisions, even if there's a possibility of failure or negative consequences.</p> <p>Team members have a duty of care to ensure that clients are informed about risk decision they are making and support their decision making by suggesting and where relevant/possible, implementing controls to mitigate risk.</p>
Discrimination	Discrimination occurs when a person with a certain characteristic (such as their race, religion, sex, gender, political preference etc) is treated less favourably than a person without that characteristic in the same, or similar circumstance.
Duty of Care	<p>Duty of Care is a legal responsibility that all members of the community have, to care for the safety and well-being of others. In a work context, Duty of Care means providing a reasonable standard of care in line with your role and context, with the aim of protecting clients, employees, and community members from harm.</p> <p>A reasonable standard of care is defined as the level of care that could reasonably be expected from other people acting in a role or context similar to yours.</p>
Domestic and Family Violence	Domestic violence
	<p>Domestic violence refers to acts of violence that occur between two people who are, or were, in an intimate relationship. It includes physical, sexual, emotional, psychological, and financial abuse.</p> <p>While there is no single definition, the central element of domestic violence is behaviour motivated by gendered drivers of violence that can involve controlling a partner through fear, coercion and intimidation — for example by using behaviour that is violent and threatening. In most cases, the violent behaviour is part of a range of tactics to exercise power and control over women and their children and can be both criminal and non-criminal.</p>
	<p>Family violence</p> <p>Refers to violence between family members, as well as between intimate partners. It involves the same sorts of behaviours as described for domestic violence but includes the broader range of marital and kinship relationships in which violence may occur.</p> <p>Family violence is also a relevant term when referring to complex forms of violence where family and in-laws, as well as other family members of the abusive spouse, can arrange for violent acts to be committed against the victim or are themselves abusive toward the victim.</p>
Embed	<i>Embedded means solidly, securely or firmly inside something.</i>
Enterprise-wide	<i>Enterprise-wide means the entire organisation and all its functions.</i>
Equitable	<i>Equity means something that is fair and reasonable. It is similar to equality, but it acknowledges that not everyone starts at the same place, and it focuses on helping people obtain what they need so they can get to a place where equality is possible.</i>
External Reporting	<p>yourtown has legal obligations and requirement to report certain acts, events, disclosures, observations, incidents, breaches (etc) to external authorities and bodies. Areas that may require external reporting relevant to safeguarding include but not limited to:</p> <ul style="list-style-type: none"> Criminal acts – police

Term	Definition
	<ul style="list-style-type: none"> Reportable conduct – state/territory authorities Mandatory reporting – state/territory child protection authorities or policy Privacy and Data Breaches
Feedback	Information received that pertains to general suggestions, compliments, or expressions of dissatisfaction with services.
Grooming	Behaviour that makes it easier for an offender to procure a child for sexual activity. This can occur in person or through electronic equipment. For example, an offender might build a relationship of trust with the child, and then seek to sexualise that relationship by encouraging romantic feelings or exposing the child to sexual concepts through pornography.
Harm	Harm is any detrimental effect or impact on an individual's physical, psychological, or emotional wellbeing. Harm may be caused by all forms of physical, emotional, or sexual, abuse; neglect; or exploitation, whether intentional or unintentional. Foreseeable or Risk of Harm is harm that could reasonably be predicted
Illicit Drugs	Illicit drugs are illegal drugs to have (for example, cannabis, heroin and cocaine), and the non-medical use of drugs that are legally available such as pain sleeping pills.
Implementation	<i>Implementation means to put an idea or set of processes into practice.</i>
Integral	<i>Integral means an essential part of something, that should not work without it.</i>
People Leader/ Manager	Line/Service/Program Manager and Program Supervisor - The manager/supervisor a yourtown team member reports to.
Line of Sight	An unobstructed view to a child young person and/or adult at risk where a yourtown team member is alone with the person.
Mandatory reporting	Mandatory reporting is the legislative requirement to report suspected cases of child harm, abuse and neglect to government authorities. See the Australian Government - Australian Institute of Family Studies – Mandatory Reporting Resource Sheet for Service Providers for a schedule of who is required to report; what must be reported; and the types of harm that must be reported in each state and territory jurisdiction.
Online abuse	Online abuse includes using social media, games, or other forums to make: <ul style="list-style-type: none"> abusive, degrading, or hateful comments about a person threats of physical or sexual violence to a person repeated or unwanted sexual requests to a person Abusive behaviours also include: <ul style="list-style-type: none"> cyber-stalking, which includes constantly checking on a person through their social media activity or by calling and texting them accessing a person's email or social media account to discover information about them or to impersonate them. In most cases, abusers are able to gain access to accounts through passwords that are saved on shared devices, or because they know the password, or it is easy to guess. setting up fake social media accounts in another person's name in order to harass or humiliate them. In some cases, abusers may use an account in the name of a child or a friend in order to keep a close watch on their target. This is known as 'proxy abuse'. using image-based abuse, which includes sharing, or threatening to share, real or manipulated intimate images of a person, and spreading lies or malicious rumours about a person.

Term	Definition
	In the context of domestic and family violence, online abuse covers a range of behaviours an abusive person can use to control, frighten, or humiliate their partner, ex-partner or family using technology.
Operationalise	<i>Operationalises means to put something into action or to operate something.</i>
Practice Supervisor	A senior practitioner is responsible for: <ul style="list-style-type: none"> • supporting the client practice knowledge/skills development of frontline team members • undertaking case reviews with frontline team members, and and/or Line Managers • carrying out Duty of Care consultations.
Racism	Racism is a form of discrimination. It is usually accompanied by the power to discriminate against a person, oppress, or limit the right of another person on the basis of race leading to inequitable opportunities, and outcomes for that person.
Reportable Conduct and Reportable Conduct Schemes	Reportable conduct schemes are legislated reporting mechanisms that seek to improve how organisations respond to allegations of child abuse committed by staff or volunteers and third-party providers with which organisations engage with or are engaged by. Reportable conduct schemes do not work in isolation, they operate alongside other reporting obligations, such as police, departments of human services, and departments of education. To understand more about reporting see yourtown's Reportable Conduct Schemes Policy
Safeguarding	<i>Safeguarding means the measures yourtown puts in place to keep people, especially children, young people and adults at risk (CYPAR), engaging with yourtown safe and reduce the opportunity for harm.</i> Safeguarding is the umbrella term for policies, procedures and practices employed to safeguard CYPAR who come into contact with an organisation, from exposure to harm during engagement with the organisation, including abuse or exploitation.
Safeguarding culture	<i>Safeguarding culture means that safeguarding is a part of everything that we do and that everyone that is a part of yourtown puts the safety and wellbeing of people that work or engage with us as the highest priority.</i>
Strengths-based practice	A strengths-based approach acknowledges the positive aspects of the individual or family. A strengths-based approach looks for what the victim- survivor can do (rather than cannot do), and focuses on aspirations, goals, successes (no matter how small), and explores their hopes for the future. It focuses on the strengths of the victim-survivor to foster empowerment.
Team members	<i>Team member means anyone working for yourtown who has been onboarded through yourtown's people and culture processes (for an employee) and has agreed to follow yourtown's code of conduct (excluding social enterprise trainees).</i> Team members includes anyone who is onboarded through yourtown People and Culture, employee/talent acquisition processes who have signed one of yourtown's code of conduct, either employed by yourtown , engaged by yourtown on a sub-contract basis, or engaged by yourtown on a voluntary or unpaid basis. Team members may include volunteers, trainees, students, and Board members.
Trauma-informed and victim-centred support	Trauma-informed support is a strengths-based framework which is founded on five core principles – safety, trustworthiness, choice, collaboration and empowerment, as well as respect for diversity. Trauma-informed services do no harm, i.e., they do not re-traumatise or blame victims for their efforts to manage their traumatic reactions, and they embrace a message of hope and optimism that recovery is possible. In trauma-

Term	Definition
	informed services, trauma survivors are seen as unique individuals who have experienced extremely abnormal situations, which they have managed as best they could.
Third party provider	A third-party provider is any external organisation or individual with which yourtown works. This includes service providers, vendors, suppliers, consultants, sub-consultants, contractors, sub-contractors, agents, researchers, representatives, sponsors and their employees, or other persons working on their behalf. Third party providers may also be sole traders or self- employed persons.
Violence	<p>Violence is a threatened or enacted form of harm that can be physical and/or psychological in nature. In a workplace, it is the most extreme form of unacceptable behaviour. It covers a broad range of behaviours that can create a risk to the health and safety of workers and clients. Incidents of violence can be a singular occurrence or repeated. Examples include:</p> <ul style="list-style-type: none"> • verbal or written assaults or threats • throwing objects • pushing, shoving, tripping, grabbing • striking, kicking, scratching, biting, spitting or any other physical contact • attacking with knives, guns, clubs, or any other type of weapon • intimidating behaviour that creates a fear of violence, such as stalking or sexual harassment (whether physical or virtual), or threatening to do any of the above • hazing or initiation practices for new or young workers, and <p>gendered violence, where behaviour is directed at any person or affects a person because of their sex, gender or sexual orientation, or because they do not adhere to socially prescribed gender roles, that creates a risk to health and safety.</p>
Visitor	Visitors may include young people who are not yourtown clients, external service team members, representatives of government and other organisations, donors and supporters, contractors, vendors, friends and family of clients or members of the public.
Working with children, young people and adults at risk	Working with children, young people and adults at risk (CYPAR) means engaging in an activity with a child, young person or adult at risk where the contact would reasonably be expected as a normal part of the activity, and the contact is not incidental to the activity. Working includes volunteering or other unpaid work.
Workplace	In yourtown , workplaces include service locations as well as corporate head office.
Young Person	Young person refers to older children and adolescents up to 25.

9 reference and related documents

Documents reference and relating to this policy have been added to their relevant section.

External

- Australian Privacy Principles Guidelines: Privacy Act 1988 (OAIC, 2014)
- Commonwealth Child Safe Framework
- National Catholic Safeguarding Standards
- New South Wales Child Safe Standards
- National Office for Child Safety: Complaint Handling Guide 2019.
- National Principles for Child Safe Organisations
- The Royal Children's Hospital Safe Sleeping Guide
- Rednose Safe Sleeping Guide
- United Nations Convention on the Rights of Persons with Disabilities
- United Nations Convention on the Rights of the Child

- United Nation Covenant on Civil and Political Rights
- United Nation Covenant on Economic, Social and Cultural Rights
- United Nations Declaration of Human Rights
- United Nations Declaration on the Rights of Indigenous Peoples
- Victorian Child Safe Standards

10 governance

Safeguarding and this policy is governed by the following legislation:

- Charter of Human Rights and Responsibilities Act 2006(Victoria)
- Care and Protection of Children Act 2007 (Northern Territory)
- Children and Community Services Act 2004 (Western Australia)
- Children and Young Persons (Care and Protection) Act 1998 (New South Wales)
- Children and Young People Act 2008 (Australian Capital Territory)
- Children and Young People (Safety) Act 2017 (South Australia)
- Children, Youth and Families Act 2005 (Victoria)
- Child Protection Act 1999 (Queensland)
- Child Safety (Prohibited Persons) Act 2016 (South Australia)
- Child Wellbeing and Safety Act 2005 (Victoria)
- Children, Young Persons and Their Families Act 1997 (Tasmania)
- Human Rights Act 2004(Australian Capital Territory)
- Human Rights Act 2019(Queensland)
- Privacy Act 1988 (Cth)
- Australian Privacy Principles (Cth)

11 document review details

The scope, findings and recommendations of the review should be outlined in a report for consideration by the Safeguarding Committee and yourHeads.

Where possible, the review of the SiPP should take place to coincide with an Annual Safeguarding Audit, and the reports should be presented to yourHeads for consideration together.

Review Details	Reviewed On	Revision
Initial review to address implementation issues; clarification and editing for ease of reading/following.	November 2022	V1
End of year review to address minor issues identified by team members following initial review release	19 December 2022	V2
SA DHS Suggested updates/review – including mandatory reporting, criminal law/code, language updates (abuse, harm, risk of harm and/or neglect).	March 2023	V2.2
Due to extensive changes – please see the Summary of Changes Brief – 2024 SiPP Review for an overview.	June 2024	V 3