



# policy

## safeguarding in practice

|                 |                                         |                  |           |
|-----------------|-----------------------------------------|------------------|-----------|
| Document number | POL-2270                                | Approval date    | 17 Jun 25 |
| Approved by     | yourtown Board of Executives            | Next review date | 17 Jun 26 |
| Document owner  | Safeguarding and Investigations Officer |                  |           |
| Applies to      | All yourtown                            |                  |           |

## contents

|                                                                                         |           |
|-----------------------------------------------------------------------------------------|-----------|
| summary .....                                                                           | 3         |
| Where to go if you would like to know more about safeguarding at <b>yourtown</b> .....  | 4         |
| purpose .....                                                                           | 5         |
| scope .....                                                                             | 5         |
| our commitment to cultural safety, diversity and inclusion .....                        | 5         |
| harm prevention and minimisation .....                                                  | 6         |
| <b>5.1 Recruiting safe and capable team members .....</b>                               | <b>6</b>  |
| 5.1.1 Practice objective .....                                                          | 6         |
| 5.1.2 Document/links relevant to this section .....                                     | 6         |
| 5.1.3 Requirements and responsibilities .....                                           | 7         |
| <b>5.2 Embedding safeguarding into induction and training .....</b>                     | <b>7</b>  |
| 5.2.1 Practice objective .....                                                          | 7         |
| 5.2.2 Document/links relevant to this section .....                                     | 8         |
| 5.2.3 Requirements .....                                                                | 8         |
| 5.2.4 Responsibilities.....                                                             | 8         |
| <b>5.3 Assessing and mitigating safeguarding risk .....</b>                             | <b>9</b>  |
| 5.3.1 Practice objective .....                                                          | 9         |
| 5.3.2 Documents/links relevant to this section .....                                    | 9         |
| 5.3.3 Requirements and responsibilities .....                                           | 9         |
| <b>5.4 Assessing and mitigating risk – violence and aggression .....</b>                | <b>10</b> |
| 5.4.1 Practice objective .....                                                          | 10        |
| 5.4.2 Requirement – safety.....                                                         | 11        |
| 5.4.3 Responsibilities – safety training.....                                           | 11        |
| <b>5.5 Working with safe suppliers/third-party providers and services .....</b>         | <b>11</b> |
| 5.5.1 Practice objective .....                                                          | 11        |
| 5.5.2 Documents related to this section .....                                           | 12        |
| 5.5.3 Requirements .....                                                                | 12        |
| 5.5.4 Responsibilities.....                                                             | 12        |
| 5.5.5 Responsibilities – reporting and audits .....                                     | 13        |
| <b>5.6 Upholding rights and supporting self-advocacy.....</b>                           | <b>14</b> |
| 5.6.1 Practice objective .....                                                          | 14        |
| 5.6.2 Responsibilities – upholding human rights .....                                   | 15        |
| 5.6.3 Responsibilities – upholding cultural rights.....                                 | 16        |
| 5.6.4 Requirements – informed consent and photos, videos, and audio recording.....      | 16        |
| 5.6.5 Responsibilities – photos, videos and audio recordings.....                       | 18        |
| 5.6.6 Requirements - feedback and complaints.....                                       | 18        |
| <b>5.7 Engaging people accessing our services (PAS), families and communities .....</b> | <b>19</b> |
| 5.7.1 Practice objective .....                                                          | 19        |
| 5.7.2 Documents/links relevant to this section .....                                    | 19        |

|             |                                                                                          |           |
|-------------|------------------------------------------------------------------------------------------|-----------|
| 5.7.3       | Commitments.....                                                                         | 19        |
| 5.7.4       | Engagement mechanisms.....                                                               | 19        |
| 5.7.5       | Engagement requirements.....                                                             | 20        |
| 5.7.6       | Responsibilities.....                                                                    | 20        |
| <b>5.8</b>  | <b>Preventing the opportunity for harm – line of sight and appropriate contact.....</b>  | <b>20</b> |
| 5.8.1       | Practice objective.....                                                                  | 20        |
| 5.8.2       | Document/links relevant to this section.....                                             | 20        |
| 5.8.3       | Requirements – line of sight.....                                                        | 21        |
| 5.8.4       | Responsibilities – line of sight.....                                                    | 21        |
| 5.8.5       | Practice objective – appropriate contact.....                                            | 22        |
| 5.8.6       | Requirements – appropriate contact and upholding ethical and professional standards..... | 22        |
| 5.8.7       | Responsibilities – appropriate contact.....                                              | 22        |
| <b>5.9</b>  | <b>Maintaining safe physical environments.....</b>                                       | <b>22</b> |
| 5.9.1       | Practice objective.....                                                                  | 22        |
| 5.9.2       | Documents relevant to this section.....                                                  | 23        |
| 5.9.3       | Responsibilities.....                                                                    | 23        |
| 5.9.4       | Responsibilities – workplace safety, signage, and instructions.....                      | 24        |
| 5.9.5       | Design requirements – workplace safety, signage and instruction.....                     | 24        |
| 5.9.6       | Responsibilities – supporting children.....                                              | 24        |
| 5.9.7       | Responsibilities – water safety.....                                                     | 24        |
| 5.9.8       | Responsibilities – <b>yourtown</b> vehicles, and transporting clients.....               | 25        |
| 5.9.9       | Requirements – residential programs.....                                                 | 26        |
| 5.9.10      | Responsibilities – residential programs.....                                             | 26        |
| 5.9.11      | Requirements – safe sleeping.....                                                        | 26        |
| 5.9.12      | Responsibilities - safe sleeping.....                                                    | 26        |
| 5.9.13      | Requirement – domestic and family violence (DFV) services.....                           | 27        |
| 5.9.14      | Responsibilities – domestic and family violence services (DFV).....                      | 27        |
| 5.9.15      | Requirement – home visit and outreach procedure, guideline and tools.....                | 28        |
| 5.9.16      | Requirements – visitors to <b>yourtown</b> site or location.....                         | 28        |
| 5.9.17      | Responsibilities – visitors to <b>yourtown</b> 's site or location.....                  | 28        |
| <b>5.10</b> | <b>Maintaining safe virtual environments.....</b>                                        | <b>28</b> |
| 5.10.1      | Practice objective.....                                                                  | 28        |
| 5.10.2      | Documents relevant to this section.....                                                  | 29        |
| 5.10.3      | Requirements.....                                                                        | 29        |
| 5.10.4      | Responsibilities - counselling.....                                                      | 29        |
| <b>5.11</b> | <b>Maintaining safe systems – storing and sharing client data.....</b>                   | <b>30</b> |
| 5.11.1      | Practice objective.....                                                                  | 30        |
| 5.11.2      | Documents relevant to this section.....                                                  | 30        |
| 5.11.3      | Requirement.....                                                                         | 31        |
| 5.11.4      | Responsibilities.....                                                                    | 31        |
| <b>5.12</b> | <b>Maintaining safe online environments – websites and social media.....</b>             | <b>31</b> |
| 5.12.1      | Practice objective.....                                                                  | 31        |
| 5.12.2      | Documents relevant to this section.....                                                  | 32        |
| 5.12.3      | Commitment – promoting and delivering services safely online.....                        | 32        |
| 5.12.4      | Requirement – promoting and delivering services safely online.....                       | 32        |
| 5.12.5      | Responsibilities – delivering services safely online.....                                | 33        |
| 5.12.6      | Practice objective - safe and inclusive websites.....                                    | 34        |
| 5.12.7      | Practice objective - social media.....                                                   | 34        |
| 5.12.8      | Requirements – social media.....                                                         | 34        |

|                                                                                         |           |
|-----------------------------------------------------------------------------------------|-----------|
| 5.12.9 Responsibilities – audit .....                                                   | 35        |
| when harm is imminent; is or has occurred .....                                         | 35        |
| <b>5.13 Risk assessing client safety concerns and managing client emergencies .....</b> | <b>35</b> |
| 5.13.1 Requirements .....                                                               | 36        |
| 5.13.2 Documents/links relevant to this section .....                                   | 36        |
| 5.13.3 Responsibilities.....                                                            | 37        |
| 5.13.4 Internal management of client safety concerns.....                               | 38        |
| 5.13.5 Feedback and complaints management .....                                         | 39        |
| <b>5.14 Recognising the signs of abuse, harm or neglect .....</b>                       | <b>40</b> |
| 5.14.1 Requirements .....                                                               | 40        |
| <b>5.15 Responding to risk of harm, harm, abuse or neglect .....</b>                    | <b>40</b> |
| 5.15.1 Abuse or harm complaint handling processes .....                                 | 41        |
| 5.15.2 External reporting of harm .....                                                 | 41        |
| learning and improvement.....                                                           | 42        |
| <b>5.16 Commitment to continual quality improvement.....</b>                            | <b>42</b> |
| <b>5.17 Review of safeguarding policies and procedures .....</b>                        | <b>43</b> |
| <b>5.18 Safeguarding assurance .....</b>                                                | <b>43</b> |
| 5.18.1 Practice objective .....                                                         | 43        |
| 5.18.2 Documents/links relevant to this section .....                                   | 43        |
| 5.18.3 Requirement .....                                                                | 43        |
| 5.18.4 Responsibilities.....                                                            | 43        |
| record keeping .....                                                                    | 43        |
| consequences .....                                                                      | 44        |
| terms and definitions .....                                                             | 44        |
| reference and related documents.....                                                    | 51        |
| governance .....                                                                        | 52        |
| document review details.....                                                            | 52        |

## summary

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

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

- [Practice Governance Principles](#)
- [Practice Framework](#)
- [Duty of Care Mandatory Reporting Policy](#)
- [External Reporting of Organisational Harm Policy](#)

**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 our Consumer Rights Position Statement and is supported by our Code of Conduct and **yourtown** Practice Framework.

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 ongoing 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 in implementing and sharing the SiPP are available on the **yourtown** [Safeguarding SharePoint](#) pages.
- Safeguarding stickers or posters have been provided to all sites. These must be displayed in high traffic areas. Purpose:
  - To ensure everyone accessing yourtown is aware of safeguarding commitments and can self-advocate.
  - Responsibility for display lies with site or service managers.
- The **yourtown** website includes a [Safeguarding page](#):
  - Contains essential safeguarding information.
  - Includes many of the documents listed and linked on SharePoint.
- The Kids Helpline [website](#) offers safeguarding information:
  - Tailored for children, young people, and parents.
  - Designed to be age and ability appropriate.

Safeguarding must be [integral](#) to all **yourtown** work, services and practice.

## 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 and defining 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** team 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 child safe practice, 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)

## 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. 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, [people accessing services \(PAS\)](#), and visitors to **yourtown** may be subject to certain sections of the SiPP.

Compliance with the SiPP is an [enterprise-wide](#) requirement.

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.

## 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

|                                                                                                            |     |               |
|------------------------------------------------------------------------------------------------------------|-----|---------------|
| safeguarding in practice                                                                                   | DN: | POL-2270      |
| COMPANY CONFIDENTIAL Correct when printed from the Document Portal.<br>Printed documents are uncontrolled. |     | Page: 5 of 53 |

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. Relevant **yourtown** position commitment statements include:

- [Respecting LGBTIQ+ and Diversity](#)
- [Diversity and Inclusion](#)

The [yourtown Practice Framework](#) outlines how culturally safe and inclusive principles guide our work and what these look like in practice.

All team members are required to complete Diversity, Equity, Inclusion and Belonging (DEIB) training and cultural safety training to ensure culturally safe environments for Aboriginal and Torres Strait Islander people.

Culturally and linguistically diverse training is provided to relevant team members to equip them with the knowledge and understanding of diverse cultural backgrounds and how to create culturally 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**.

The [yourtown Aboriginal and/or Torres Strait Islander Community Engagement Framework](#) provides organisation-wide guidance for effective engagement with and engagement of Aboriginal and/or Torres Strait Islander communities:

- emphasising the importance of cultural safety, respect, and genuine collaboration in building positive and productive relationships and,
- supports **yourtown** in developing culturally responsive practices that empower Aboriginal and/or Torres Strait Islander voices, promote self-determination, and contribute to equitable outcomes for all stakeholders, including:
  - how we will recruit and retain Aboriginal and Torres Strait Islander team members ([Aboriginal and Torres Strait Islander recruitment strategy](#))
  - how we will seek and encourage Aboriginal and Torres Strait Islander owned business to partner with and become part of the **yourtown** supply network ([Aboriginal and Torres Strait Islander procurement strategy](#))

## harm prevention and minimisation

### 5.1 Recruiting safe and capable team members

#### 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. A key first step in achieving this is ensuring that all team members are screened and deemed suitable to be working with children, young people and adults at risk (CYPAR).

#### 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 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) or equivalent.
- 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 and reporting this data back to the Safeguarding Committee.

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*

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.

Leaders must also keep a record of providers that do not meet **yourtown** minimum safeguarding requirements. The Procurement Manager should report to the safeguarding committee on the number and reason for accepting the risk or alternative mitigation to the allowing of accepting of the risk of not meeting **yourtown** minimum requirements.

## 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](#).

### 5.2.3 Requirements

All team members must complete the following safeguarding training:

- 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.
- Team members complete additional evidence-based training/professional development that is consistent with their role e.g., foundation modules 1- 7 Child Sexual Abuse and Exploitation.

### 5.2.4 Responsibilities

#### *Key department owner – People and Culture*

All safeguarding training and learning activities developed by People and Culture in consultation with relevant Knowledge and Performance teams must include 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.

The safeguarding committee must be provided a brief on compliance with training requirements including data on the number of team members outstanding and length of time to complete (i.e., within expectation or outside of expectation).

#### *Executives/board and those in safeguarding specific roles*

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.

#### *Team members*

All team members must complete safeguarding induction and training appropriate to their role including the foundational safeguarding induction and training regarding the SiPP within the specified timeframe.



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. At 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 team member with children, young people or adults at risk until all induction training relevant to their role has been completed. Should resourcing mean that this requirement cannot be met, this must be captured in the program risk register and approved by a yourHead.

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 and mitigating safeguarding risk

### 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*

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).

All **yourtown** departments that provide services or have interactions with people accessing our services (PAS) and the broader **yourtown** community are required to have an up-to-date risk register, identifying high level safeguarding risks specific to their area of service. These should be reviewed and updated at a minimum annually or when there has been an incident involving organisational harm of children, young people or adults at risk. Any program providing services to CYPAR should have considered safeguarding risk and compliance with the practice requirements outlined in this and other key policies. If you are unable to comply with any practice requirement related to safeguarding preventions this must also be addressed in the register and signed off by a yourHead.

#### 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.

## 5.4 Assessing and mitigating risk – violence and aggression

### 5.4.1 Practice objective

**yourtown has a zero tolerance to violence or aggression towards others.**

---

*Trends identified in feedback sought from people accessing our services (PAS) and their families have told us that although they feel very safe and trust **yourtown** team members, they do on occasion feel unsafe due to the behaviour and actions of other PAS they engage with or have met at **yourtown**.*

---

**yourtown** recognises that the most effective measure to reduce harm is prevention and this extends to the elimination of any risk of violence or aggression, however we also recognise that fear and trauma may present as aggression or violence and aim to understand and be understanding of underlining reasons for these behaviours in PAS.

Due to the nature of **yourtown** services and the people we support it is important that an individualised approach is taken to safety planning and risk management with PAS who have self-identified or been observed to have unsafe behaviours, posing a risk to themselves or others.

**yourtown** has range of additional security and work systems in place to reduce hazards and the risk of violent situations, and to keep everyone 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, team members working alone on site (or at night) will have an on-call leader available to support any client risk safety concern decision making and other team members they can call on to support in emergency situations
- providing clearly visible CCTV in a number of common areas at workplace sites where PAS reside or where PAS will be unsupervised by team members
- providing safety watches where available
- contracting security services or security specialist for short periods while high unmitigated risk can be managed
- ensuring a clear expectation is set for all those engaging with **yourtown** or attending a **yourtown** site, and this message is visible and accessible via different mediums e.g.,

posters, client agreements, welcome information for PAS, codes of conducts, position vacant adds

- having policies and procedures in place to prohibit and/or add alternative and consequences for alcohol and illicit drug use.

#### 5.4.2 Requirement – safety

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

Any patterns of behaviour by PAS that indicate a risk to others should be risk assessed, and a safety plan put in place where continued engagement where risks are identified as being manageable and in alignment with yourtown practice and are within the service or program scope. Any significant incidents of aggression or violence by PAS towards other PAS is a client incident and must be managed appropriately including reporting and recording in QIS.

#### 5.4.3 Responsibilities – safety training

##### *People leaders*

Leaders 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 processes.

Leaders, 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. Leaders 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).

Leaders or yourHeads, in consultation with the Work, Health and Safety team, should develop emergency response plans in relation to violent behaviours, and note these measures or processes as control in their risk register as appropriate. Where relevant to their role, leaders should ensure relevant team members complete de-escalation training.

##### *Team members*

All team members must know and understand the emergency response plans for their service/site and/or location, including their duty of care responsibilities in responding to emergency situations, and how to assess immediate and significant risk in an emergency situation.

### 5.5 Working with safe suppliers/third-party providers and services

#### 5.5.1 Practice objective

**yourtown** recognises third party providers as a higher safeguarding risk due to a number of factors and endeavours to put all reasonable controls in place to ensure that risks are mitigated, known, balanced and/or accepted<sup>1</sup> by the organisation.

<sup>1</sup> When a third-party provider is unable or unwilling to meet **yourtown's** minimum safeguarding compliance requirements there are not alternatives or work arounds to having that service need met, **yourtown** Heads or CEO may make the decision to exempt the service and onboard as a supplier/provider even though it does not meet policy. Any risk associated with not meeting minimum safeguarding compliance requirements must be accepted and recorded by the organisation or department head.

**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 and/or agree to **yourtown** child safe requirements.

**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 Infoexchange
- 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.

### 5.5.2 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](#)

### 5.5.3 Requirements

The **yourtown** Visitor Induction Procedure outlines the process that must be followed by all visitors to **yourtown** sites and events, including all non **yourtown** employee's (e.g., third party providers) visiting **yourtown** in a professional capacity.

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

At a minimum, all third-party providers that will be working directly with **yourtown** PAS who are under 18 years old must provide confirmation 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 providers/suppliers working directly with PAS aged under 18 years have a current Working with Children Check (or equivalent) verified for accuracy by **yourtown** before having access to CYPAR.

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.

Any feedback or complaints related to suppliers or providers received from PAS or relating to client health, safety and wellbeing must be escalated to the appropriate leader and the Procurement Manager and recorded in QIS.

### 5.5.4 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.

### 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 people accessing our services (PAS) 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 Induction 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.

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

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

**All complaints about a third-party provider must be recorded in QIS no matter how minor.** Team members do not need leader approval to lodge a QIS fact.

### Supporting and advocating for client rights and safety

As part of standard practice, all team members should ensure PAS are aware of their rights and encourage self-advocacy by providing PAS with information on how and where they can report any concerns about their safety, including where to make a complaint or give feedback on how safe they felt in engaging with the third-party provider. Transparency is not only strongly encouraged and where appropriate, required; risk assessments should be completed with clients any they should be offered the opportunity to accept or decline engagement with a third-party provider.

### 5.5.5 Responsibilities – reporting and audits

#### People leaders

Procurement is responsible for:

|                                                                                                            |     |                |
|------------------------------------------------------------------------------------------------------------|-----|----------------|
| safeguarding in practice                                                                                   | DN: | POL-2270       |
| COMPANY CONFIDENTIAL Correct when printed from the Document Portal.<br>Printed documents are uncontrolled. |     | Page: 13 of 53 |

- maintaining and reviewing the Supplier Register
- reviewing and reporting on compliance or non-compliance of safeguarding minimum safeguarding requirements
- providing information on the compliance rate and inclusion of additional appropriate safeguarding contract clauses
- reporting to the Safeguarding Committee:
  - any suppliers **yourtown** is wanting to use/onboard that do not meet **yourtown** minimum safeguarding requirements to ensure a record of acceptance of this risk
  - 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 client 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 relating to client incidents received by **yourtown** in relation to its third-party providers, and
- the number and nature of any critical incidents or complaints related to client incidents received about **yourtown**'s third party providers.

yourHeads and Safeguarding Committee:

- In the event that **yourtown** has a need to work with a provider or supplier that does not meet our minimum requirements for child safe practice, this risk must be accepted and owned by the relevant yourHead, and the Safeguarding Committee informed.

## 5.6 Upholding rights and supporting self-advocacy

### 5.6.1 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 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 PAS 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.*

### 5.6.1 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](#)
- [yourtown Practice Framework](#)
- [Safeguarding SharePoint](#) page
- [Kids helpline](#) – yourtown website
- yourtown Welcome Information Booklet
- yourtown Child Rights Poster
- yourtown Childs Rights Storybook

## 5.6.2 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 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 **yourtown's** practice framework, 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 PAS 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 child/client rights and **yourtown** feedback and complaints processes.

Leaders must provide guidance (in the form of procedures and/or supervision) to their team members on 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 ability 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*

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 safe<sup>2</sup>- physically, emotionally, culturally, socially, and spiritually
- to ask for information<sup>3</sup>
- participate on their own terms<sup>4</sup>

<sup>2</sup> 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.

<sup>3</sup> 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.

<sup>4</sup> 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 abuse<sup>5</sup>, harm and risk of harm, neglect<sup>6</sup>, and inadequate care<sup>7</sup>, and
- be informed of who to contact if they have concerns about their safety or the safety of their peers<sup>8</sup>.
- 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 PAS 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 PAS understand their rights.

### 5.6.3 Responsibilities – upholding cultural rights

#### *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.<sup>9</sup> 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 PAS
- 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.

### 5.6.4 Requirements – informed consent and photos, videos, and audio recording

All those engaging with **yourtown** have a right to be informed and be provided with information that will support informed decision making, including how **yourtown** handle, shares and stores their personal information.

#### *Team members and visiting professionals*

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

<sup>5</sup> 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.

<sup>6</sup> 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.

<sup>7</sup> See footnote 5.

<sup>8</sup> See footnote 2.

<sup>9</sup> The United Nations Declaration on the Rights of Indigenous Peoples (2007) HR/PUB/13/2.

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 PAS 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.

#### *People accessing our services (PAS), families, friends and other visitors*

Visitors of People accessing our services (PAS) 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. PAS 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.

PAS 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.

### 5.6.5 Responsibilities – photos, videos and audio recordings

#### *People leaders*

Leaders of the service/program or workplace where the photos, videos or audio recordings of PAS will be taken must be consulted prior to any photos or videos being taken.

Leaders are responsible for ensuring that any PAS or participants have completed and returned their consent form relating to the taking and use of photos, videos, and audio recordings. Leaders 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.

#### *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, no personal information is on display, and that the media are not in proximity of counsellors who are undertaking sessions with PAS 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 PAS 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 with children unsupervised.

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

### 5.6.6 Requirements - feedback and complaints

Encouraging and supporting those engaging with our services (PAS) to self-advocate and provide feedback by 'telling us what they think' and voicing their concerns is essential to making sure that we provide the best supports and practice.

#### *Any door is the right door*

**yourtown** is committed to an 'any door is the right door' approach to managing feedback and complaints. This means:

- **yourtown's** feedback and complaints system must be accessible to all people and this is achieved in our message that method they choose to voice their concerns is the right one and will result in the matter being taken seriously
- PAS will not only be supported to provide feedback or complaints, but encouraged to
- **yourtown** will ensure any matter raised is directed to the most appropriate place, regardless of the method or platform chosen to raise it

- **yourtown** uses different mediums to ensure everyone is aware of their right to self-advocate and have provided this information in a way that meets diverse needs and abilities
- varied pathways about how to offer feedback or make a complaint are available at **yourtown**, including:



Complete an online form via **yourtown** social media, QR code, website, message or other feedback link.



Speak with a **yourtown** team member over the phone or in person.



Write **yourtown** a letter and post it to GPO BOX 2469 Brisbane QLD 4001



Email **yourtown** at [feedback@yourtown.com.au](mailto:feedback@yourtown.com.au) or [safeguarding@yourtown.com.au](mailto:safeguarding@yourtown.com.au)



Complete a feedback form or survey post activity or support



Don't have the words or know where to start - look for the child's rights poster for a helping hand.

## 5.7 Engaging people accessing our services (PAS), families and communities

### 5.7.1 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:

- 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.

### 5.7.2 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 SharePoint page](#)
- Youth engagement risk matrix
- [yourtown Practice Framework](#)

### 5.7.3 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

### 5.7.4 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 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.

### 5.7.5 Engagement requirements

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.

### 5.7.6 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.

#### 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.

## 5.8 Preventing the opportunity for harm – line of sight and appropriate contact

### 5.8.1 Practice objective

Safeguarding methodology helps us to understand the importance of all the child safe practices we are implementing, it explains the why behind the what.

Research shows that abuse usually happens when three things come together: someone is vulnerable, someone else has bad intentions or poor self-control, and there's a chance for it to happen. To stop abuse, we need to look at the things that make each of these situations possible.

At **yourtown**, access and opportunity is the factor that we are most able to address as an organisation. Access and opportunity is the only area in which we are able 'if all goes right' to remove the risk of harm entirely i.e., 'no access and opportunity, no intersection'.

The best way to achieve this in practice is to ensure that CYPAR are never alone at **yourtown** with anyone that may have or hold an actual or potential power over them (excluding parents and guardians).

### 5.8.2 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](#)

### 5.8.3 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 and accepted by a yourHead (or in an Emergency, an appropriate alternative people leader/manager).

### 5.8.4 Responsibilities – line of sight

#### *Client Services*

**yourtown** acknowledges that the nature and services of some of our client services programs means 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 with CYAPR. Due to the complexity of the clients we support, often immediate safety needs will outweigh the potential risk for opportunity of harm that certain scenarios will present.

Wherever possible, team members responsible for working directly with CYPAR should ensure they meet 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, to 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.

#### *Property team*

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*

Leaders 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 WHS teams, should 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.

Site/service managers are responsible for reviewing current workplaces/sites against compliance with line-of-sight requirements.

### 5.8.5 Practice objective – appropriate contact

All **yourtown** team members and people accessing our services (PAS) must follow **yourtown** practice requirements relating to appropriate contact and what constitutes both appropriate and inappropriate contact/behaviours, including consequences.

When following informed consent and appropriate contact, power dynamics must also be considered and plays a critical role.

*Appropriate contact means they 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.

### 5.8.6 Requirements – appropriate contact and upholding ethical and professional standards

All team members should behave in a way that is consistent with the **yourtown** Practice Framework (**yPF**), Code of Conduct and Ethical Conduct and Practice Policy, including:

- establishing professional boundaries with PAS to ensure team members are acting in the best interests of the client and avoiding conflicts of interest,
- not contacting PAS 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 guideline outlines 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.

### 5.8.7 Responsibilities – appropriate contact

#### *Team members*

Team members must ensure that:

- their practice is consistent with the requirements of their role and **yourtown** policy
- 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 PAS or informing of **yourtown** expectations relating to physical contact.

## 5.9 Maintaining safe physical environments

### 5.9.1 Practice objective

**yourtown** is responsible for the health and safety of everyone accessing its workplaces, as stated in our Workplace, Health, Safety and Wellbeing Position Statement and Duty of Care Position Statements. **yourtown** aims to provide physical environments that are safe for all who access and use them.

Workplaces may need to make particular adjustments to the physical environment to ensure CYPAR remain safe and free from harm and to meet **yourtown** safeguarding requirements.

Education plays an important role in keeping everyone at **yourtown** safe. **yourtown** provides 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. For example, **yourtown's** Welcome Information Booklet for clients/PAS explains expectations for physical safety while engaging in our programs and services and accessing our sites.

Creating an environment that feels safe to children, young people and adults at risk is also extremely important to foster positive engagement and for learning and development.

*A physical environment in the context of safeguarding refers to the external surroundings and conditions at **yourtown**, which may impact or influence a person's health or safety or feelings of safety or create a safeguarding risks.*

### 5.9.2 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
- [External Reporting of Organisation Harm Policy](#)
- [Critical Incident Policy](#)
- [Client Incident Management 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](#)

### 5.9.3 Responsibilities

#### *People leaders*

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

#### Team members

All team members have a duty of care to make sure that they, and others in the workplace, are safe. Team members 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 and ensuring CYPAR feel safe in their environment.

In addition to the requirements of this policy, all team members must follow the Workplace Health Safety and Wellbeing (WHS) 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,
- 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.

#### 5.9.4 Responsibilities – workplace safety, signage, and instructions

##### People leaders

Site/service managers, in consultation with the People and Culture WHS 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.

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

#### 5.9.6 Responsibilities – supporting children

##### 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.

#### 5.9.7 Responsibilities – water safety

##### People leaders

Leaders, in consultation with WHS, 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.

### *Team members at residential sites or those facilitating 'body of water' or water-based activities*

All team members must advise PAS, 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. People accessing our PAS 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.

### 5.9.8 Responsibilities – **yourtown** vehicles, and transporting clients

**yourtown** recognises (supported by data) that transporting of clients either in **yourtown** vehicles or facilitation transport via other means for **yourtown** clients is evidenced to create an environment of higher potential for harm to CYPAR.

#### *Property team*

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*

Leaders are responsible for ensuring a first aid kit is kept all **yourtown** vehicles and must ensure this is inspected annually.

#### *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 and ensure that adequate safeguarding risks assessment is completed relevant to trainee/clients.

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.

#### *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.

#### *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.

### 5.9.9 Requirements – residential programs

Every home **yourtown** provides 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. Client/residents should be encouraged to report any safety or safeguarding concerns to **yourtown** team member/s promptly.

### 5.9.10 Responsibilities – residential programs

#### *People leaders*

Service/site 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).

### 5.9.11 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.

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

### 5.9.12 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 appropriately represent additional safeguarding controls in their risk register.

#### *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.



### 5.9.13 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 and seek approval prior to attending.

### 5.9.14 Responsibilities – domestic and family violence services (DFV)

#### *People leaders*

Managers of DFV residential services, in consultation with the WHS 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.

#### *Team members*

All team members must immediately report any concerns with the operation of the security systems or safety devices to the service manager directly and to the Property and WHS team immediately, so equipment can be repaired or replaced as soon as possible or alternative safety measures arranged.

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

- 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.
  - All risk and safety assessments undertaken with the PEV must consider their emotional wellbeing, and be conducted in a sensitive, trauma-informed way.
- A local safety plan ensuring the local areas surrounding the residential service are safe.
- Regular reviews of clients' safety plans and risk assessments to account for dynamic risk.
- 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.

### 5.9.15 Requirement – home visit and outreach procedure, guideline and tools

**yourtown** recognises (supported by data) that meeting clients outside of the workplace, in their home or other environment is evidenced to have a higher potential for harm to CYPAR.

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.

### 5.9.16 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.

### 5.9.17 Responsibilities – visitors to **yourtown**'s site or location

#### *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 (see section 5.5 for additional considerations for visitors who are also third-party providers).

#### *People leaders*

Service/program managers can introduce their own visitor procedures and/or processes; however, these must introduce aligned or stronger safeguarding and security requirements than the organisational wide policy.

## 5.10 Maintaining safe virtual environments

### 5.10.1 Practice objective

**yourtown** aims to actively promote safety and wellbeing, while minimising the opportunity for harm to children, young people, and adults at risk during the provision of **yourtown** services virtually.

It is not feasible in confidential one-to-one virtual counselling services, to avoid private interactions (e.g., a child alone with a counsellor). **yourtown** must therefore ensure robust risk mitigation strategies that balance safety with the need for confidentiality.

**yourtown** offers:

- programs that are designed to only deliver services virtually, such as our crisis phone and online counselling services offered in our Kids Helpline, Parentline, and Kids Helpline @ School programs.
- emergency on-call service to clients in residential programs, which may provide after-hours crisis/incidental counselling support over the phone.
- virtual information and support with clients and young people in private group platforms (e.g., My Circle) and public platforms, i.e., social media (refer to section 5.12).

On occasion **yourtown** face-to-face programs may also offer counselling appointment via teams or other virtual mediums outside of business as usual (e.g., during COVID).

### 5.10.2 Documents relevant to this section

- [Supporting Safety in Virtual Services Document Suite](#)
- Program/service specific On Call Procedures.

### 5.10.3 Requirements

To maintain a safe virtual environment **yourtown** balance safeguarding risk, specifically for those providing virtual counselling services by:

- Conducting comprehensive risk assessments for virtual environments, identifying potential risks of harm or abuse, harm, risk or harm and neglect.
- Developing risk management registers that outline specific actions to mitigate these risks, such as:
  - use of secure, monitored platforms
  - clear protocols for initiating and ending sessions
  - emergency response procedures if a child discloses harm.
- Ensuing our safeguarding, and code of conduct policies explicitly address:
  - online interactions
  - privacy expectations
  - appropriate behaviour in virtual settings.
- Requiring documents be accessible and regularly reviewed with **yourtown**, clients (including CYPAR) and community.
- Providing specialised training for team members on:
  - maintaining professional boundaries online
  - recognising signs of distress or abuse in virtual settings
  - responding appropriately to disclosures
  - implement regular supervision and debriefing to support team members and monitor practice.
- Educating children and young people about:
  - their rights in counselling
  - how to raise concerns or complaints
  - what to expect in a virtual session
  - obtaining informed consent from both the child and their parent/guardian (where appropriate), explaining confidentiality limits and safety protocols.
- Having technology that allows for session logs, timestamps, or even optional recording (with consent) to ensure accountability.
- Having second and third team members/supervisors (in a supervisory role) who are available for contact during sessions if needed.
- Having secure, encrypted platforms that comply with privacy laws and organisational policies.
- Ensure the child is in a safe, private space during the session.

### 5.10.4 Responsibilities - counselling

#### *yourHead/Service Managers*

- Ensure that Safeguarding Policy requirement are embedded in virtual service delivery and procedures.
- Ensure all team members are recruited, trained, and supervised in line with safeguarding requirements.
- Oversee the implementation of risk management plans for counselling/crisis virtual supports.
- Ensure technology platforms used are secure, compliant, and support safe practice.
- Lead a culture of child safety, ensuring continuous improvement and accountability.

### Supervisors

- Provide regular clinical and safeguarding supervision to counsellors.
- Monitor adherence to professional boundaries and organisational policies.
- Review session logs or summaries (where appropriate) to identify risks or concerns.
- Support team members in managing disclosures of harm and ensure mandatory reporting and reportable conduct obligations are met.
- Facilitate debriefing and reflective practice to maintain team wellbeing and vigilance.

### Team leaders

- Act as the first point of contact for team members raising safeguarding concerns.
- Ensure team members are aware of and follow incident reporting procedures.
- Coordinate team training on child safety, including updates on virtual service risks.
- Promote peer support and collaboration to reduce isolation in virtual work.
- Monitor team compliance with session protocols, including consent and privacy practices.

### Counsellors/team members

- Deliver services in line with the **yourtown** code of conduct and safeguarding policies.
- Obtain and document informed consent from children and (where appropriate) guardians.
- Maintain professional boundaries and ensure sessions are conducted in safe, private, and appropriate settings.
- Be alert to signs of harm or distress and follow mandatory reporting and reportable conduct procedures.
- Keep accurate, confidential records and participate in supervision and training.

## 5.11 Maintaining safe systems – storing and sharing client data

### 5.11.1 Practice objective

**yourtown** is committed to maintaining the highest standards of data protection and privacy for our clients, CYPAR. To achieve this, we have established the following objectives:

- Ensure that data protection and privacy are integral to our organisational leadership, governance, and culture. This includes regular training and awareness programs for all team members to foster a culture of data security and privacy.
- Provide clients with clear information about their data rights and how their data is collected, stored, and used. Ensure clients are informed about their rights to access, correct, and delete their personal information.
- Involve families and communities in promoting data safety and privacy. This includes transparent communication about data protection practices and encouraging feedback to improve our systems.
- Conduct regular audits and assessments of our data protection practices to ensure compliance with the latest legal requirements and best practices. Continuously improve our systems based on audit findings and feedback from clients and team members.

### 5.11.2 Documents relevant to this section

All **yourtown** team members must read and agree to:

- [Information Security Management System \(ISMS\) Commitment Position Statement](#)
- [Information Technology Security Policy](#)
- [Privacy Policy](#)
- [Information Classification Policy](#)
  - Information Classification Handling Table
- [Information and communications technology \(ICT\) acceptable use Policy](#)
- [Mobile Device Policy](#)

- [Data Breach Response Procedure](#)
- [Protecting privacy - information sheet -what is a data breach? Guideline](#)
- [Information Sharing Guidelines](#)
- [Transfer of Information and Data Policy](#)
- [Information Technology Physical Access Security Procedure](#)
- [Information Processing Device Management Policy](#)
- [Information Security Exception Process Procedure](#)
- [Client File and Information Security & Transportation Procedure](#)
- [Information Security Management System \(ISMS\) Awareness Training](#)
- [Consent to Release/Obtain Personal Information Form](#)

### 5.11.3 Requirement

To ensure compliance with Australian legislation on privacy and data protection, **yourtown** adheres to the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). These principles mandate the lawful collection, storage, and use of clients (including CYPAR) personal information, ensuring transparency, accuracy, and security. Additionally, our organisation complies with sector-specific regulations such as the Telecommunications Act 1997 (Cth) and the My Health Records Act 2012 (Cth), which provide further protections for sensitive data. Regular audits and assessments are conducted to verify compliance and to identify areas for improvement.

### 5.11.4 Responsibilities

#### *Information Development and Technology (IDT) team*

The IDT department is responsible for implementing and maintaining secure systems for data storage and ensuring that all data protection measures are up-to-date and effective. This includes conducting regular security audits, managing data encryption protocols, and overseeing the secure disposal of data when no longer needed.

IDT team are responsible for feeding back to the Safeguarding Committee any unmitigated system or data risk relating to CYPAR so a record can be kept of who owns the risk and any actions to control the risk.

#### *People leaders*

Leaders and managers play a crucial role in fostering a culture of data protection within the organisation. They are responsible for ensuring that all team members are aware of their data protection obligations, providing necessary training, and allocating resources to support data protection initiatives.

yourHeads must ensure that data protection policies are integrated into the organisation's strategic objectives and all team members know how to respond and report on data breaches.

#### *Team members*

All team members are required to adhere to the organisation's data protection policies and procedures. This includes handling clients personal data responsibly, reporting any data breaches promptly (as outlined in the Data Breach Response Procedure, and participating in regular training sessions to stay informed about best practices in data protection.

## 5.12 Maintaining safe online environments – websites and social media

### 5.12.1 Practice objective

**yourtown** aims to actively promote safety and wellbeing, while minimising the opportunity for harm to children, young people, and adults at risk of being harmed during engagement with **yourtown** through online environments.

### 5.12.2 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 Policy](#), and Code of Conduct training 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 training course.

### 5.12.3 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.

### 5.12.4 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 Conduct and Practice Policy](#).

**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 accounts<sup>10</sup> is only completed by 'Authorised Users'. Authorised Users for Client Services brands (public accounts<sup>11</sup>):

- 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.

<sup>10</sup> Excludes private client groups and My Circle

<sup>11</sup> 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).

### 5.12.5 Responsibilities – delivering services safety online

#### People leaders

Leaders 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, neurodiversity, 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.

#### 5.12.6 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 contain:

- 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 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

#### 5.12.7 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.

#### 5.12.8 Requirements – social media

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

- Digital Self-Service Therapeutic Framework and Model of care
- Digital Self-Service Content Creation Guidelines
- Social Media Policy, and
- 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 **yourtown's** [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. Any complaints or disclosures of harm received relating to **yourtown** must be addressed as required by the Client Incident Management Policy and recorded in QIS.

#### 5.12.9 Responsibilities – audit

**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 quarterly report on training compliance to the Safeguarding Committee

*People leader* are responsible for:

- ensuring their team members complete the mandatory training

*yourHeads* are responsible for providing a report on any:

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

## when harm is imminent; is or has occurred

### 5.13 Risk assessing client safety concerns and managing client emergencies

An emergency is any sudden, unexpected situation that poses an immediate risk to the health, safety, or wellbeing of others. Emergencies require prompt and effective action to prevent harm and ensure safety. Emergencies in a safeguarding or duty of care context will generally require immediate external specialist support e.g., fire, ambulance, police.

Due to **yourtown's** presence in the community and the services we provide we are often required to respond to emergencies not only at our sites, but also those that are identified virtually or online (e.g., through our crisis services, social media or other means), i.e., those that occur outside of the workplace. Key steps taken to manage emergencies (i.e., recognising, responding including risk assessment, reporting, recording, reviewing) will be the same irrelevant of how and where the emergency may present itself.

**When an emergency involves a child, young person or adult at risk there may be additional factors that should be considered to act in their best interest as we are not only managing the emergency but also considering the potential further harm the emergency situation may present.**

**yourtown** has a number of crisis services where responding to emergencies impacting clients/users/members/trainees/residents (duty of care) may be business as usual (BAU). These services have additional preventions (risk mitigation some identified in 5.9) practice requirements, expectations and standards.

**yourtown** is committed to ensuring all team members are equipped to recognise and respond to client emergencies effectively and uphold their legal and ethical duty of care obligations. This includes taking reasonable steps to prevent foreseeable harm and responding appropriately to the type of emergency.

As stated in the Client Duty of Care (DoC) Procedure, DoC requiring an emergency or immediate response may include (but is not limited to):

- medical/health emergencies including drug overdoses
- threats of violence or abuse and a means or plan to act
- disclosure of imminent danger or harm of a criminal nature (including child abuse, harm, risk of harm offences)
- acts of physical harm towards themselves
- statements of wanting to commit or act towards significantly harming themselves without engaging in protective safety planning

### 5.13.1 Requirements

To meet statutory obligations for both safeguarding and workplace health and safety during an emergency **yourtown** is required to:

- Develop, maintain, and regularly review emergency response procedures (e.g., fire, medical, lockdown).
- Ensure team members can identify what constitutes an emergency situation and respond promptly and appropriately.
- Comply with legal, professional and ethical obligations.
- Understand information sharing and privacy limitations under emergency circumstances, including the concept of implied consent.
- Provide regular training on emergency procedures, duty of care, WHS responsibilities, and child protection laws.
- Maintain accurate records of incidents, reports, and actions taken.
- Ensure compliance with WHS legislation by identifying and managing risks, maintaining safe facilities, and consulting with team members on safety matters.
- Ensure team members working with clients and community in crisis are trained and provided appropriate supports to manage high-risk calls/contacts and escalate appropriately, including key factors to consider when completing risk assessments of emergency situations involving CYPAR.

### 5.13.2 Documents/links relevant to this section

- [yourtown Emergency Management Plan](#)
  - Each site must have its own version of this plan, see the document relevant for your site or service. This plan must include emergency procedures for immediate response and escalation for any significant threat of violence or events of harm to child, young person or adult at risk e.g., evacuations, lockdowns, calling an ambulance and first aid etc.
- [Critical Incident Policy](#)
- [Practice Principles for Reporting Child Sexual Abuse/Exploitation Procedure](#)
- [WHS \(Workplace Health Safety\) and Wellbeing Policy](#) (and other **yt** [safety systems](#))
- [Code of Conduct Policy](#)
- [Providers Code of Conduct Policy/Agreement](#)
- [Client Duty of Care Management Procedure](#)
- [Duty of Care Information Guide Form](#)
- [Quality Improvement System \(QIS\) Administration Guideline](#)
- [QIS Feedback and Incidents Guideline](#)

### 5.13.3 Responsibilities

#### *People leaders*

- Lead by example in promoting a child-safe and WHS-compliant environment.
- Ensure all team members are trained and understand their responsibilities.
- Monitor compliance with emergency, safeguarding, and WHS procedures.
- Support team members in responding to incidents, understanding where to apply **yourtown** policies related to emergencies and fulfilling reporting obligations.
- Liaise with external agencies, including WHS regulators and emergency services.

#### *Team members*

- Understand and follow the organisation's emergency, safeguarding, and WHS procedures.
- Take reasonable steps to protect children and others from foreseeable and potential harm.
- Respond to emergencies swiftly and calmly, ensuring the immediate safety of all individuals.
- Follow emergency protocols such as evacuation, lockdown, or first aid procedures.
- Alert emergency services (e.g., 000) when required and provide accurate, timely information.
- Administer first aid within the scope of their training until professional help arrives.
- Support and reassure children and others during and after emergencies using trauma-informed approaches and seek/offer to connect them with team members or external supports best able to provide appropriate post therapeutic care.
- Report any suspicions, disclosures of harm, or incidents to the appropriate authority or designated officer and consult with **yourtown** key specialist to understand any areas of grey for reporting (see [table 1](#) of key contacts for internal reporting and consultation).
- Maintain confidentiality and document incidents accurately, including actions taken and follow-up required in the appropriate system (e.g., CIS, QIS, Property dashboard, IDT dashboard, ERC risk email etc.)
- Participate in WHS and emergency response training and report hazards or safety concerns promptly.
- Engage in debriefing and review processes to improve future emergency preparedness and response and ensure child safe practice was followed.

#### *Team members whose role it is to provide crisis support as part of BAU*

- Recognise and assess the nature and urgency of crisis situations involving CYPAR, whether in person or via other medium (phone, message, social media post).
- Provide calm, supportive, and trauma-informed responses to children in distress (**yourtown** Practice Framework).
- Follow escalation protocols for high-risk situations, including immediate threats to life or safety (see the Critical Incident Policy).
- Activate emergency services when required and notify relevant internal leaders.
- Deliver therapeutic support as part of business-as-usual (BAU) responsibilities, using evidence-based approaches to de-escalate and stabilise.
- Build and maintain safe, trusting relationships with CYPAR to support emotional regulation and recovery.
- Post emergency response:
  - Collaborate with internal and external professionals (e.g., psychologists, case workers, child protection) to ensure coordinated care.
  - Maintain clear, compassionate communication with CYPAR and their families, respecting cultural, dignity of risk and individual needs.
  - Document all crisis-related interactions accurately and confidentially, including assessments, interventions, and referrals.

- Participate in regular training on trauma-informed practice, child protection, and emergency response.
- Engage in clinical supervision, reflective practice, and wellbeing support to manage the emotional demands of the role.
- Contribute to continuous improvement of crisis response frameworks through feedback, training, and evaluation.

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

#### 5.13.4 Internal management of client safety concerns

**yourtown** team members should be familiar with different types of client safety concerns and how **yourtown** requires these to be managed including post follow up support for clients and 'closing the loop' to advise (where possible/relevant) of any learning and actions taken by **yourtown** for improvement.

Table 1. Reporting systems and key contacts for expert consultation

| Client safety concern                                                                                                                       | Report via                                                                                                                                                             | Area expert consultation                   |
|---------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| Workplace health and safety hazards, incidents, near misses                                                                                 | <a href="#">Report an Incident</a> or <a href="#">Report a Hazard</a> online forms on <a href="mailto:safety@yourtown">safety@yourtown</a> SharePoint page (or in QIS) | WHS Partner                                |
| Data breaches                                                                                                                               | <a href="#">Report at Data Breach online form</a> on IDT SharePoint                                                                                                    | ID&T team                                  |
| Privacy breaches                                                                                                                            | QIS or email <a href="mailto:privacy@yourtown.com.au">privacy@yourtown.com.au</a>                                                                                      | ERC team                                   |
| Conflict of Interest                                                                                                                        | <a href="mailto:coi@yourtown.com.au">coi@yourtown.com.au</a>                                                                                                           | ERC team                                   |
| Bullying, harassment and other inappropriate behaviours (by clients and community members)                                                  | Quality Improvement System (QIS)                                                                                                                                       | yourHead or Practice Supervision team      |
| Bullying, harassment and other inappropriate behaviours by Suppliers or Third-Party Providers                                               | QIS                                                                                                                                                                    | Procurement Manager                        |
| Client Duty of Care safety event of concern that has required reporting to an external authority (e.g., Mandatory Reporting, Police Report) | CIS Duty of Care Report or email to Practice Supervision Manager or Senior Practice Supervisor.                                                                        | Practice Supervision team                  |
| Complaints (formal or informal) about yourtown                                                                                              | QIS                                                                                                                                                                    | Department relevant to the complaint type. |

#### Internal management of harm as a result of **yourtown**

To understand requirements for the managing of events, incidents, near misses, reasonable belief of harm caused to clients (including CYPAR) at a **yourtown** (sites, events, locations), or as a result of **yourtown** (people places or programs), team members must follow the [Client Incident Management Policy](#). This policy identifies the most relevant and appropriate policies and procedures for managing the type of client harm that has occurred or is at risk of occurring.



**yourtown** team members are required to seek advice when the type of client incident is unclear.

### *Responsibilities*

#### **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. The [Quick Guide to Opening a Client Incident QIS FACT](#) provides further support to understand the reporting process. Team members may also need to complete reporting in the Client Information System (CIS).

Team members must be familiar with and complete relevant training for all external and internal reporting requirements for different types of client incidents, see the Client Incident Management Policy to understand these further.

#### **People Leaders**

Leaders (or delegate) are 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.

Leaders 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.

Leaders (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 (see [Navigating QIS - Team Leaders Guideline](#)), 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** 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.

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

#### **5.13.5 Feedback and complaints management**

To understand requirements for the handling and management of feedback and complaints at **yourtown**, team members must follow the [Feedback and Complaints Policy](#) (for further information on responding to complaints of abuse or harm by CYPAR please see section 5.15.1)

## 5.14 Recognising the signs of abuse, harm or neglect

**yourtown** aims to empower all team members to act confidently and appropriately when abuse, harm or neglect concerns are recognised. Early recognition of the signs of abuse, harm, or neglect can play a significant role in the prevention of further harm/trauma.

### 5.14.1 Requirements

All team members are required to complete **yourtown** training to ensure they:

- 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
- can 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
- can recognise 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.

## 5.15 Responding to risk of harm, harm, abuse or neglect

**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**.

To meet the highest standards of care (duty of care) and statutory obligations, **yourtown** has a range of policies, procedures, and other measures in place to ensure age-appropriate and trauma-responsive approaches are used when managing emergencies, safety concerns, disclosures and allegations relating to risk of harm, harm, abuse or neglect or other harmful behaviours (e.g., bullying, discrimination and harassment).

All team members are required to be familiar with policies outlining their/**yourtown**'s statutory obligations under various reporting legislation (above listed) related to the management of duty of CYAR safety concerns.

**yourtown** requires that all team members:

- be appropriately qualified and screened in accordance with legal requirements
- have the knowledge, skills and training to identify harm and understand their obligations relating to duty of care (DoC)
- apply due care and diligence in decision making in accordance with the Client Duty of Care Guideline
- 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)
- be aware of [yourtown safeguarding governance](#).

### 5.15.1 Abuse or harm complaint handling processes

To understand requirements for the handling of complaints received by clients (CYPAR) relating to abuse or harm team members must follow the [Abuse or Harm Complaints Procedure](#). To ensure children, young people and adults at risk making complaints are provided appropriate supports during disclosures of harm, risk of harm abuse and neglect, and the role and responsibilities of a 'first responder' please see the [Complaints Handling Guideline](#) or the [Safeguarding Feedback and Complaints SharePoint page](#).

### 5.15.2 External reporting of harm

External reporting of harm is part of emergency management, duty of care management, client incident management processes, and depending on the specific compliance requirement for the type or cause of harm; reporting may occur anytime during the management process.

**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).

#### *External reporting of harm as a result of yourtown*

To understand requirements for reporting harm as a result of **yourtown**, team members must follow the [External Reporting of Organisational Harm Policy](#) (EROHP).

Any instances of child abuse, harm or risk of harm, or neglect to a child by a **yourtown** team member must be reported externally as per relevant criminal code, mandatory reporting laws and reportable conduct schemes (see [External Reporting Obligations SharePoint page](#)).

#### *External reporting of the reasonable belief of harm to a child not a result of yourtown*

All **yourtown** team members are required to follow the [Duty of Care Mandatory Reporting Policy](#) (DoCMRP). This policy outlines our statutory obligations for reporting the reasonable belief of harm to children (under 18 years) to the relevant regulatory authority (see table below).

#### *Receiving disclosures*

You must report information to the child protection authority (or your local police for cases of abuse/harm against adults) in the relevant jurisdiction as soon as practicable after the disclosure either by electronic notification or by telephone.

If you believe a child or young person is in immediate danger, contact police on 000.

| State                        | Service                                            | Phone number |
|------------------------------|----------------------------------------------------|--------------|
| South Australia              | Child Abuse Report Line (CARL)                     | 13 14 78     |
| Queensland                   | Child Safety After Hours Service Centre            | 1800 177 135 |
| New South Wales              | Child Protection Helpline                          | 132 111      |
| Victoria                     | After Hours Child Protection Emergency Service     | 13 12 78     |
| Tasmania                     | Strong Families Safe Kids Advice and Referral Line | 1800 062 123 |
| Western Australia            | Central Intake Team                                | 1800 273 889 |
| Australian Capital Territory | Child and Youth Protection Services                | 1300 556 729 |
| Northern Territory           | Child Protection Reporting Line                    | 1800 700 250 |

All team members are expected to respond to, and appropriately address any disclosures, concerns, or complaints, whether or not the law requires reporting.

**External reporting is just one component of good reporting practice. The phone numbers listed above are up to date at the time of last publishing, it is always recommended that you seek the most up to date information from your relevant state/territory government page.**

If team members receive a disclosure, notification or allegation relating to abuse (harm or neglect) whether through engagement with **yourtown** site or outside of **yourtown** should, after ensuring there is no immediate risk of harm (i.e., no emergency response required), informing of rights and seeking informed consent:

- listen to the person without interrupting or expressing alarm (with the exception of protective interrupting)
- 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, noting/recording this information appropriately e.g., Duty of Care Report or Risk Assessment Form or by following any program specific requirements for disclosures.
- 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
- maintain appropriate confidentiality, with due regard to the Australian Privacy Principles and any other Federal Contract Requirements
- consider and meet all external and internal reporting obligations (if you require support to understand your obligations, see **yourtown** linked, mandatory reporting and external reporting or organisation harm policies).

Once a report has been made to the relevant authority (see reporting obligations), team members must:

- notify their leader of the report that has been made (if they were not already involved) and complete any other required internal reporting e.g., Duty of Care Report in CIS.
- 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.

#### Additional responsibilities

**yourtown** has a number of departments whose role it is to ensure the organisation meets external compliance obligations and support in decision making by providing expert consultation and guidance to team members for significant harm to clients that is not identified under safeguarding policy. Team members are required to escalate to the appropriate team within specific timeframes as outlined in the appropriate policy (see [Table 1](#), above for further information).

## learning and improvement

### 5.16 Commitment to continual quality improvement

**yourtown** is committed to maintaining the highest standards of child rights, safety and wellbeing through a culture of quality and continuous improvement. We recognise that safeguarding children is an evolving responsibility that requires regular evaluation and enhancement of our policies, procedures, and practices. Continuous improvement is achieved through systematic

review processes, including audits, incident review/investigation, stakeholder feedback, and engagement with children and families. We are dedicated to learning from experience, applying evidence-based practices, and adapting to emerging risks and community expectations. This commitment ensures that our child safe practices remain effective, responsive, and aligned with our core values of safety, respect, and inclusion.

## 5.17 Review of safeguarding policies and procedures

This policy must be reviewed annually until full [maturity](#) is reached and then at a minimum every three years.

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.

## 5.18 Safeguarding assurance

### 5.18.1 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 internal audit planning activities, endorsed by the Board Finance and Risk Committee (FRC).

### 5.18.2 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](#)

### 5.18.3 Requirement

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

### 5.18.4 Responsibilities

#### *Enterprise Risk and Compliance (ERC)*

The ERC Manager is responsible for, in consultation with the Safeguarding Committee and other relevant team members, developing an internal audit plan that will review processes that impact safeguarding. The ERC Manager is also responsible for seeking FRC endorsement for the plan.

## record keeping

**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** Practice 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.

The Enterprise Risk and Compliance team is responsible for ensuring that there are policies and/or procedures in place on information sharing and record keeping in relation to safeguarding.

## consequences

**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.

## terms and definitions

| Abbreviation             | Term                                     | Abbreviation | Term                                     |
|--------------------------|------------------------------------------|--------------|------------------------------------------|
| <b>BAU</b>               | Business as Usual                        | <b>NCHC</b>  | National Criminal History Check          |
| <b>CEO</b>               | Chief Executive Officer                  | <b>NCSS</b>  | National Catholic Safeguarding Standards |
| <b>CIS</b>               | Client Information System                | <b>PAS</b>   | People Accessing Services                |
| <b>CRC</b>               | Convention on the Rights of the Child    | <b>PCGC</b>  | People and Culture Governance Committee  |
| <b>Cth</b>               | Commonwealth                             | <b>PGRP</b>  | Practice Governance Review Panel         |
| <b>CYAR</b>              | Children young people and adults at risk | <b>QIS</b>   | Quality Improvement System               |
| <b>DoC</b>               | Duty of Care                             | <b>RAP</b>   | Reconciliation Action Plan               |
| <b>e.g.</b>              | for example                              | <b>SiPP</b>  | Safeguarding in Practice Policy          |
| <b>ERC (or ER&amp;C)</b> | Enterprise Risk and Compliance           | <b>SG</b>    | Safeguarding                             |



| Abbreviation | Term                                     | Abbreviation | Term                                     |
|--------------|------------------------------------------|--------------|------------------------------------------|
| <b>FRC</b>   | Board Financial and Risk Committee       | <b>WHS</b>   | Workplace Health, Safety (and Wellbeing) |
| <b>ICT</b>   | Information and Communication Technology | <b>WWCC</b>  | Working with Children Check              |
| <b>IDT</b>   | Information Development and Technology   | <b>yPF</b>   | <b>yourtown</b> Practice Framework       |
| <b>i.e.</b>  | More specifically                        | <b>yt</b>    | <b>yourtown</b>                          |

| Term                        | Definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Adult at Risk</b>        | 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.                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Advocates and allies</b> | <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>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Approved Adult</b>       | 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.<br><br>In a <b>yourtown</b> residential setting, an approved adult can include a parent or legal guardian of a child or young person, or adult family member.                                                                                          |
| <b>Bullying</b>             | 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).                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Child</b>                | '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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Child Abuse</b>          | 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.<br>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.<br><br>Sexual abuse can cause emotional, psychological and/or physical harm.<br><br>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: |

| Term | Definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      | <ul style="list-style-type: none"> <li>making sexually suggestive, obscene comments made in person, by telephone, or through social media to a child</li> <li>speaking to a child about graphic sexual matters</li> <li>using technology to send messages with obscene or sexual content or images to a child (this can include 'sexting')</li> <li>persistent, unwanted intrusion of a child's personal space that increase the child's vulnerability to sexual abuse</li> <li>showing pornographic material including films, magazines, photographs or internet websites to a child</li> <li>using the internet or social media technologies to lure a child for sexual purposes.</li> <li>forcing a child to watch a sexual act</li> <li>covertly or overtly watching, taking photographs or electronically recording a child in bathrooms, bedrooms or toilets, or in various states on undress</li> <li>being inappropriately nude, partially nude, disrobing in front of a child, 'flashing' or exposing a sexual body part to a child</li> <li>engaging in a sexual act in the presence of a child</li> <li>kissing or holding a child in a sexual manner</li> <li>fondling a child's body in a sexual manner or asking the child to fondle another person's body</li> <li>engaging a child in acts of child prostitution</li> <li>masturbating while child observes, observing a child masturbate, engaging in mutual masturbation with a child including child masturbating another child/person.</li> <li>undertaking clothed or unclothed dry intercourse (a person rubbing their genitals against the child's genitals and/or anal areas)</li> <li>undertaking fellatio (oral to genital contact for males)</li> <li>undertaking cunnilingus (oral to genital contact for females), and</li> <li>using an object to penetrate the vagina or anus, or penile or digital penetrations.</li> </ul> |
|      | <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"> <li>rejection</li> <li>name calling, teasing or bullying</li> <li>yelling</li> <li>criticism</li> <li>isolation or locking a child up for extended periods, and</li> <li>exposure to domestic and family violence.</li> <li>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 needs met, including their protection and care needs. Domestic and family violence can: <ul style="list-style-type: none"> <li>affect a child's emotional wellbeing and development</li> <li>teach them that violence is a solution to problems, and</li> <li>cause post-traumatic stress disorder.</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

| Term                                                                                         | Definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                              | Neglect                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                                                                              | 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.                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Child exploitation</b>                                                                    | 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.                                                                                                                                                                                                                                                                                                                  |
| <b>People accessing services/ client (Resident, User, Member, Trainee, Youth Consultant)</b> | <i>People accessing services (external language) or clients (internal language) means any individual or family who is engaging or has made steps to engage with a <b>yourtown</b> service or program (for the purpose of safeguarding, <b>yourtown</b> social enterprise trainees are defined as clients, however they must also comply with certain requirements of a <b>yourtown</b> team member.)</i><br><br>For the purposes of the SiPP, client is also taken to mean anyone that is or has (in the past) engaged with a <b>yourtown</b> service or program, as well as participants in <b>yourtown</b> engagement activities, employment services and social enterprise activities. |
| <b>Compliance</b>                                                                            | <i>Compliance means following or meeting a rule or requirement.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Conjunction</b>                                                                           | <i>Conjunction means at the join of two things, or two things happening at the same time that work together.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Consolidate</b>                                                                           | <i>Consolidates means to put a number of things together to make them stronger.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Contact with children, young people and vulnerable adults</b>                             | 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).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Complaint</b>                                                                             | Any matter ranging from a general expression of dissatisfaction with a service or program provided by <b>yourtown</b> , a particular experience with a person or persons involved with <b>yourtown</b> , an allegation of misconduct, policy non-compliance, harm, abuse or exploitation or an issue with the complaints management process. <sup>12</sup>                                                                                                                                                                                                                                                                                                                                |
| <b>Contractor</b>                                                                            | The individuals engaged to perform specific services under a contract, that include: <ul style="list-style-type: none"> <li>specified team members nominated in a head agreement with an intermediary company (the contractor) to which payment is made; or</li> <li>if the person performing the service is the service provider, he/she is an individual contractor.</li> </ul>                                                                                                                                                                                                                                                                                                         |
| <b>Criminal Code/Laws</b>                                                                    | 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 territory and to understand your responsibilities for reporting observed or disclosed criminal offences against children go <a href="#">here</a> .                                                                                                                                                                                                                                                                |
| <b>Dignity of Risk</b>                                                                       | 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                                                                                                                                                                                                                                                                                                                                                                                                                |

<sup>12</sup> 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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | <p>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>                                                                                                                                                                                                                                                                                                                       |
| <b>Discrimination</b>               | 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.                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Duty of Care</b>                 | <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>                                                                                                                                                                             |
| <b>Domestic and Family Violence</b> | <b>Domestic violence</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                     | <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</p> <p>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> |
|                                     | <b>Family violence</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                     | <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>                                                                                                                               |
| <b>Embed</b>                        | <i><u>Embedded</u> means solidly, securely or firmly inside something.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Enterprise-wide</b>              | <i><u>Enterprise-wide</u> means the entire organisation and all its functions.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Equitable</b>                    | <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>                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>External Reporting</b>           | <p><b>yourtown</b> 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"> <li>• <a href="#">Criminal acts</a> – police</li> <li>• <a href="#">Reportable conduct</a> – state/territory authorities</li> <li>• <a href="#">Mandatory reporting</a> – state/territory child protection authorities or policy</li> <li>• <a href="#">Privacy</a> and Data Breaches</li> </ul>                                                                    |
| <b>Feedback</b>                     | Information received that pertains to general suggestions, compliments, or expressions of dissatisfaction with services.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

| Term                          | Definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Grooming</b>               | 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Harm</b>                   | 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.<br>Foreseeable or Risk of Harm is harm that could reasonably be predicted                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Illicit Drugs</b>          | 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Implementation</b>         | <i>Implementation means to put an idea or set of processes into practice.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Integral</b>               | <i>Integral means an essential part of something, that should not work without it.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>People Leader/ Manager</b> | Line/Service/Program Manager and Program Supervisor - The manager/supervisor a <b>yourtown</b> team member reports to.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Personal disclosures</b>   | Is the sharing of personal information done in a work context, i.e., with colleagues or clients. Personal disclosure with client as a rule, should not occur, however, self-disclosure can be a useful tool when done correctly and purposefully.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Line of sight</b>          | An unobstructed view to a child young person and/or adult at risk where a <b>yourtown</b> team member is alone with the person.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Mandatory reporting</b>    | Mandatory reporting is the legislative requirement to report suspected cases of child harm, abuse and neglect to government authorities.<br>See the Australian Government - Australian Institute of Family Studies – Mandatory Reporting <a href="#">Resource Sheet for Service Providers</a> 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Online abuse</b>           | Online abuse includes using social media, games, or other forums to make: <ul style="list-style-type: none"> <li>abusive, degrading, or hateful comments about a person</li> <li>threats of physical or sexual violence to a person</li> <li>repeated or unwanted sexual requests to a person</li> </ul> Abusive behaviours also include: <ul style="list-style-type: none"> <li>cyber-stalking, which includes constantly checking on a person through their social media activity or by calling and texting them</li> <li>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.</li> <li>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'.</li> <li>using image-based abuse, which includes sharing, or threatening to share, real or manipulated intimate images of a person, and</li> <li>spreading lies or malicious rumours about a person.</li> </ul> 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. |

| Term                                                     | Definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Operationalise</b>                                    | <i>Operationalises means to put something into action or to operate something.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Practice Supervisor</b>                               | <p>A senior practitioner is responsible for:</p> <ul style="list-style-type: none"> <li>supporting the client practice knowledge/skills development of frontline team members</li> <li>undertaking case reviews with frontline team members, and and/or Line Managers</li> <li>carrying out Duty of Care consultations.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Procurement</b>                                       | A procurement department in an organisation is responsible for buying goods and services that the company needs to operate. Procurement requirements are the things we require suppliers to agree to for us to use their product or contract them.                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Racism</b>                                            | 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Reportable Conduct and Reportable Conduct Schemes</b> | <p>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.</p> <p>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.</p> <p>To understand more about reporting see <b>yourtown's</b> Reportable Conduct Schemes Policy</p>                                                                                                                                            |
| <b>Safeguarding</b>                                      | <p><i>Safeguarding means the measures <b>yourtown</b> puts in place to keep people, especially children, young people and adults at risk (CYPAR), engaging with <b>yourtown</b> safe and reduce the opportunity for harm.</i></p> <p>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.</p>                                                                                                                                                                                                                       |
| <b>Safeguarding culture</b>                              | <i>Safeguarding culture means that safeguarding is a part of everything that we do and that everyone that is a part of <b>yourtown</b> puts the safety and wellbeing of people that work or engage with us as the highest priority.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Safeguarding maturity</b>                             | <i>Safeguarding maturity is a term used by Australian Catholic Standards Limited to describe how embedded the National Catholic Safeguarding Standards are in an organisation i.e., how far an organisation has come on their journey to compliance with the standards. See the ACSL website for more information.</i>                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Strengths-based practice</b>                          | 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.                                                                                                                                                                                                                                                                                                                                 |
| <b>Team members</b>                                      | <p><i><b>Team member</b> means anyone working for <b>yourtown</b> who has been onboarded through <b>yourtown's</b> people and culture processes (for an employee) and has agreed to follow <b>yourtown's</b> code of conduct (excluding social enterprise trainees).</i></p> <p>Team members includes anyone who is onboarded through <b>yourtown</b> People and Culture, employee/talent acquisition processes who have signed one of <b>yourtown's</b> code of conduct, either employed by <b>yourtown</b>, engaged by <b>yourtown</b> on a sub-contract basis, or engaged by <b>yourtown</b> on a voluntary or unpaid basis. Team members may include volunteers, trainees, students, and Board members.</p> |



| Term                                                          | Definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Trauma-informed and victim-centred support</b>             | 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-informed services, trauma survivors are seen as unique individuals who have experienced extremely abnormal situations, which they have managed as best they could.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Third party provider</b>                                   | A third-party provider is any external organisation or individual with which <b>yourtown</b> 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Violence</b>                                               | <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"> <li>• verbal or written assaults or threats</li> <li>• throwing objects</li> <li>• pushing, shoving, tripping, grabbing</li> <li>• striking, kicking, scratching, biting, spitting or any other physical contact</li> <li>• attacking with knives, guns, clubs, or any other type of weapon</li> <li>• 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</li> <li>• hazing or initiation practices for new or young workers, and</li> </ul> <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> |
| <b>Visitor</b>                                                | Visitors may include young people who are not <b>yourtown</b> 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Working with children, young people and adults at risk</b> | 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Workplace</b>                                              | In <b>yourtown</b> , workplaces include service locations as well as corporate head office.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Young Person</b>                                           | Young person refers to older children and adolescents up to 25.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

## reference and related documents

Internal **yourtown** 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

## governance

Safeguarding and this policy is governed by the following legislation:

- Australian Privacy Principles (Cth)
- Care and Protection of Children Act 2007 (Northern Territory)
- Charter of Human Rights and Responsibilities Act 2006 (Victoria)
- Child Protection Act 1999 (Queensland)
- Child Safe Organisations Act 2024 (Queensland)
- Child Safety (Prohibited Persons) Act 2016 (South Australia)
- Child Safety (Prohibited Persons) Act 2016 (South Australia)
- Child Wellbeing and Safety Act 2005 (Victoria)
- Children and Community Services Act 2004 (Western Australia)
- Children and Young People (Safety) Act 2017 (South Australia)
- Children and Young People Act 2008 (Australian Capital Territory)
- Children and Young Persons (Care and Protection) Act 1998 (New South Wales)
- Children, Young Persons and Their Families Act 1997 (Tasmania)
- Children, Youth and Families Act 2005 (Victoria)
- Human Rights Act 2004 (Australian Capital Territory)
- Human Rights Act 2019 (Queensland)
- Parliamentary Commissioner Amendment (Reportable Conduct) Act 2022 (Western Australia)
- Privacy Act 1988 (Cth)

## document review details

| Review Details                                                                                                                                                                                                                                            | Reviewed On | Revision |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|----------|
| <b>Initial review</b> to address implementation issues; clarification and editing for ease of reading/following.                                                                                                                                          | Nov 2022    | V1       |
| <b>End of year review</b> to address minor issues identified by team members following initial review release                                                                                                                                             | Dec 2022    | V2       |
| <b>SA DHS Suggested updates/review – including</b> 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      |
| Minor review, for a full list of changes please see the Summary of Changes Brief – 2025. Edits include: <ul style="list-style-type: none"> <li>• Act, Regulation, updates (SA, QLD, WA)</li> <li>• Lasallian District Policy alignment updates</li> </ul> | June 2025   | V 4      |

| Review Details                                                                                                                                                                                                                                                                                                                                         | Reviewed On | Revision |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|----------|
| <ul style="list-style-type: none"> <li>Inclusion of sections on 'maintaining safe virtual services, and maintaining systems and data</li> <li>Reduction/changes to Duty of Care/Emergency Responses sections due implementation of new stand-alone policies.</li> <li>Addition and changes based on youth network consultation and feedback</li> </ul> |             |          |