



Safeguarding Vulnerable People Policy Guidelines



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1. Introduction

This policy outlines how Wunan will safeguard children and other vulnerable people who use our services. Every child and other vulnerable person has a right to actively participate, develop to their potential, and to be protected. As a prominent regional Aboriginal social and economic development organisation, Wunan commits to doing whatever it takes within its capacity to keep children safe, on track and connected to their community and their culture.

This policy governs the behaviour of Wunan staff, both when they are at work and also outside their official duties. Specifically it:

- spells out which behaviours, relationships and attitudes are appropriate and inappropriate
- outlines the responsibilities of staff who interact with children and other vulnerable people
- makes staff accountable for their conduct
- sets out complaint and disciplinary procedures in the event of non-compliance.

Staff and partner organisations are to avoid actions that are abusive or exploitative of children and other vulnerable people or actions that could be construed as such. A breach of this Policy may provide grounds for employment to be terminated and could result in criminal prosecution.

Wunan wishes to acknowledge the assistance of our partners, particularly children's service providers Save the Children and Key Assets, in the development of this policy. Any errors or omissions are our own.

Definition of terms used in this policy document can be found at Attachment 1. The Australian Human Rights Commission has developed National Principles for Child Safe Organisations. Wunan's service response to these principles is outlined in Attachment 2

2. Purpose and Scope

The purpose of this policy is to enable Wunan to:

- Keep vulnerable people safe from deliberate or inadvertent harm
- Accept responsibility for the protection of children and other vulnerable people in receipt of our services and care
- Ensure that the Wunan leadership, staff, children, other vulnerable people and their families understand our protective practices and the critical roles they play in keeping children and other vulnerable people safe
- Foster organisational values of openness, responsiveness and cultural respect
- Ensure that children and other vulnerable people and their families have opportunities to understand the protective practices put in place by Wunan to help keep them safe from deliberate or inadvertent harm
- Enable staff and partners to recognise and embrace their critical role in keeping children and other vulnerable people safe.

This policy applies to directors, staff and partner organisations across all workplaces where Wunan operates. Breaches of this policy may result in disciplinary action including possible dismissal and criminal proceedings. For partner organisations, breaches can lead to termination of an agreement or MOU.

This policy applies to:

- Children and other vulnerable people who use Wunan services regardless of age, culture, religion, gender or disability
- Wunan staff and staff of partner organisations across all workplaces where we operate.

3. Mission Statement

Wunan will be a safe organisation for children, other vulnerable people and their families.

Many Wunan staff routinely work with schools and other community services to improve the wellbeing of children and other vulnerable people. Wunan therefore has a responsibility to be a safe organisation for children and other vulnerable people who use our services. We will strive to embed a safe organisational culture. A safe organisation is one that adopts strategies and acts to promote wellbeing and prevent harm to vulnerable people. As a child safe organisation we will consciously and systematically work to:

- Place emphasis on genuine engagement with and the valuing of all vulnerable people
- Create an environment where safety, protection and wellbeing are at the centre of thought, values and actions
- Establish conditions that reduce the likelihood of harm to vulnerable people.

4. Our Commitment

Wunan is committed to establishing standards for the protection of children and vulnerable people, raising awareness of risks and managing them, fostering a preventative organisational culture, and training staff to ensure that they do respond appropriately should there be any incidents.

Behavioural Standards: Staff are expected to demonstrate the high standards of behaviour both in their professional and private lives. They should not abuse the trust that comes with being a Wunan employee. Program Managers have a responsibility to ensure that their staff have adequate child safety capabilities and ensure robust processes for assessing the suitability of their staff. Recruitment processes identify suitable staff and deter unsuitable candidates. It is critical to ensure that appropriate screening and behavioural checks are in place. Program managers are to ensure that partners have adequate child safety capabilities and robust processes for assessing the suitability of their staff. Wunan will take opportunities to ensure that children and their families are aware of the standards of behaviour they can expect from Wunan staff and how they can raise a concern should they ever wish to do so. Staff and partner organisations should:

- report any actual or suspected harm to a child or other vulnerable person
- ensure every decision is made in the best interests of the child

- formally acknowledge that they understand this policy
- ensure that children and other vulnerable people, their families and carers are informed about relevant Wunan programs, support services and their rights and responsibilities
- ensure the views of children other vulnerable people and their families are systematically embedded in program co-design, implementation, monitoring and evaluation processes
- ensure staff and partners have adequate child safety processes and capabilities
- ensure professional supervision and development opportunities for all staff
- breaches of policy lead to disciplinary action including possible dismissal and criminal proceedings.

Raising Awareness: Everyone associated with the delivery of support services by Wunan to children and other vulnerable people are to be made aware of the risks of abuse and sexual exploitation. Staff and partners will, in future, be required to formally acknowledge (*'sign off'*) that they understand this policy document and commit to participating in related training where this is relevant to their role. Staff are to ensure that children, other vulnerable people, and their families and carers are informed about program activities, have access to support, know their rights and responsibilities, and are aware of mechanisms for providing feedback.

Prevention: Wunan recognises that children and other vulnerable people have a right to be protected from hurt and mistreatment in body or mind. Sound work practices will minimise the risks to children and other vulnerable people. Wherever practicable we will ensure that that another adult is present when a staff member is working directly in contact with children. Staff will strive to create an environment where children are respected, and child abuse and sexual exploitation prevented. Wunan will undertake a risk assessment and develop a risk management plan to identify and mitigate risks to safety, including physical, emotional and online safety.

Training and Response: Wunan will ensure that action is taken to support, safeguard and protect children and other vulnerable people where concerns arise regarding possible abuse and exploitation. Staff are to ensure the voices of children and other vulnerable people are systematically embedded in program design, implementation, monitoring and evaluation processes. Staff and partners are to report any actual or suspected harm to a child or other vulnerable person and ensure that decisions are made are in the best interests of the child. Staff who work with children and other vulnerable people are to have access to adequate professional supervision and development. Wunan staff will be trained to know what steps to take where concerns arise regarding the abuse or exploitation of children or other vulnerable people. Wunan welcomes scrutiny to inform a process of continuous improvement.

5. Appropriate Physical Contact

Contact with children and other vulnerable people should always be relevant to the role, respectful of cultural norms, and used appropriately in response to needs.

Examples of appropriate physical contact include:

- Administration of first aid
- Supporting people who are hurt or injured
- Non-intrusive gestures to comfort a person experiencing grief, loss or other distress e.g. hand on the upper arm or upper back
- Non-intrusive touch such as congratulating a person by shaking hands or patting them on the back or shoulder
- Accompanying touch with positive and encouraging words
- Assisting with personal care needs of a disabled person where this has been negotiated with parents or carers.

Examples of inappropriate physical contact include:

- Touching in an unnecessary or culturally insensitive way any part of the body that may cause distress or embarrassment such as the groin, genital area, buttocks or breasts
- Any contact that occurs in a private place or frightens, distresses or embarrasses a child or other vulnerable person, or destroys their trust
- Doing things for a child or other vulnerable person involved of a personal nature that they can do for themselves such as toileting or changing clothes
- Sleeping in close proximity to children or other vulnerable people involved in programs or activities unless it is absolutely necessary, in which case staff should keep their Manager informed and ensure another adult is present.

Non-physical intervention is the appropriate means of managing the behaviour of children and other vulnerable people. In situations where discipline is required use of verbal directions is always preferable to physical intervention. Examples of non-physical intervention include:

- Directing children and other vulnerable people to move away from an area and situation
- Talking with a child or other vulnerable person asking that they stop the behaviour
- Stating what will happen if the behaviour does not stop
- Directing the child or other vulnerable person towards a safer place
- Directing other children and vulnerable people to a safer place
- Following the emergency plan if required
- Requesting assistance from other staff, or in extreme cases, the police.

Examples of inappropriate behaviour include pushing, grabbing, poking, pulling and blocking. Where safety is threatened, staff may make legitimate use of physical restraint if all non-physical interventions have been exhausted or is impossible in the circumstances and the child or other vulnerable person is attacking or posing an immediate danger to themselves or others. Staff have the right to defend themselves against an attack, but not to use disproportionate force. Staff are not expected to place their own safety at risk in responding to violence or aggression orchestrated by others.

6. Recognising Professional Boundaries

Wunan staff will be made aware of professional boundaries. They will not spend unnecessary time with children or other vulnerable people involved in programs and activities outside work hours. It is understood that staff members live and work in the same communities and naturally mix with children and other vulnerable people in the context of their family, social and community life. Nevertheless, it is still expected that staff will be positive role models and mentors for children and other vulnerable people.

Examples of appropriate behaviour include:

- Obtaining informed consent from parents or guardians when photographing or filming a child or using children's images or other information for work related purposes
- Ensuring children and other vulnerable people involved in research or consultation are informed of the process and have voluntarily provided consent by signing a form or recording their consent.

Examples of inappropriate behaviours include:

- Driving children and other vulnerable people around when it is not part of an approved service activity
- Giving legal, financial, religious, personal or other advice outside the bounds of the service they provide
- Disclosing personal or confidential information outside of work.

7. Social Networking

Staff are responsible for data on electronic communication devices, including what they post or choose to forward on social media. Inappropriate use of social media includes:

- Providing personal information to service users such as a personal mobile telephone number, social networking account, personal website/ blog URL, or access to online image storage sites, passwords and PIN numbers
- Accepting children or other vulnerable people as friends on social networks
- Using the internet, email, text or web-based communication to send personal messages to users of Wunan services
- Accessing child exploitation materials through any medium
- Behaving in a way that could suggest that a staff member is trying to develop a personal relationship with a child, young person or vulnerable adult
- Posting any content that could be deemed defamatory, obscene or libellous or appears to endorse grossly irresponsible behaviour or law breaking of any kind.

8. Grooming

Staff must not engage in grooming behaviour. This may involve seeking to persuade a child or group of children that they have a 'special' relationship.

Examples of inappropriate behaviour include:

- spending 'special time' with a child or other vulnerable person
- giving gifts or money or favours to some but not others
- allowing a child or other vulnerable person to overstep rules
- asking a child or other vulnerable person to keep a relationship to themselves
- undressing in front of a child or other vulnerable person
- encouraging inappropriate physical contact, even where it is not overtly sexual
- engaging in 'accidental' intimate touching
- extending a relationship outside of work where there is no pre-existing naturally occurring friendship or social interaction with the family
- engaging in personal communication outside of work, including emails, telephone calls, text messaging, social media and web forums
- discussing intimate personal feelings with a child or other vulnerable person
- requesting that a child or other vulnerable person keep any aspect of their relationship secret or use tactics designed to keep any aspect of a relationship secret.

9. Mandatory Disclosure and Investigation

Staff must report any concerns about the wellbeing of a child. Mandatory reporting includes:

- disclosure by a child or family member
- observations indicating possible harm
- allegations, suspicions or observations of inappropriate behaviour by staff
- breach of this policy caused by process failure
- accidental harm or other child-safety concern.

Children who disclose that they are feeling unsafe or being abused must be heard, taken seriously and treated with sensitivity and compassion. Staff should:

- Let them speak using their own words
- Tell them they did the right thing by telling you (reporting) what happened
- Tell them that what happened is not their fault and that they are not responsible for any abuse that may have occurred
- Listen carefully to what the child is saying
- Tell them you are pleased they told you
- Let them know what action will happen next.

Staff should not:

- Make promises they cannot keep, such as promising not to tell anyone
- Push a child into giving details of the abuse
- Conduct an investigation
- Indiscriminately discuss the circumstances.

In circumstances where an allegation is made against a staff member:

- The immediate safety and best interests of the child or other vulnerable person are the paramount consideration
- If a child or other vulnerable person is in immediate danger staff should call emergency services such as the '000' service
- All concerns reported will be treated seriously and handled sensitively

- Personal information is to be treated confidentially and privacy respected
- An external report is to be provided to government agencies such as police and child protection authorities where requested
- The right of staff and users of a service to report concerns without fear of reprisal is to be respected
- Any person accused of breaching policy or procedures is to be treated fairly and with respect
- Staff are to be advised of any allegations in a timely manner and be given a reasonable opportunity to respond to accusations
- Staff will be given the opportunity to have a support person present during any interviews or meetings during or arising out of an investigation
- Staff will have access to the Employee Assistance Program (EAP) or other relevant services to support them during the process
- Staff on restricted duties or suspended from duties while an investigation is underway are to be treated with procedural fairness, sensitivity and respect throughout the process.

Staff are to be informed that an investigation will be conducted if an allegation is made against them. Investigations to substantiate concerns will:

- Collate information and report as quickly as possible.
- Draw conclusions objectively and impartially based on all of the available information
- Observe the rules of natural justice, including the right to a fair hearing
- Be conducted without bias or the reasonable apprehension of bias
- Cease while any external investigations by government agencies are underway.

10. Leadership

Wunan's leadership is expected to model and reinforce attitudes and behaviours that demonstrate they value the safety and protection of children and other vulnerable people by:

- Endorsing this policy and ensuring it is widely available, visible, talked about and periodically reviewed
- Making a public commitment to child safety and the well-being of vulnerable people
- Ensuring that, in future, '*child safe*' promotional material is displayed prominently in Wunan workplaces and on the website
- Hearing the voices of children and considering their point of view when making decisions about them
- Committing to this policy.

The leadership is responsible for communicating regularly with staff to ensure:

- They know 'the rules' i.e. the content of this policy
- Who to talk to if there are concerns about abuse or other inappropriate behaviour
- They are vigilant about recognising the signs of harm and check with children to ask if they are 'OK'
- Know how to report abuse to people outside the organisation

- They do not try to keep concerns about abuse 'inside' the organisation due to concerns about organisational reputation
- They have opportunities to share workplace observations and problems, and to explore child safety issues
- They hear ideas and views on best practice program design and delivery
- Changes are made when a need for improvement is identified.
- Positive behaviours are recognised and reinforced
- Inappropriate behaviours are dealt with
- Staff raise issues without fear of retribution if they feel unsafe or have concerns about the wellbeing of a child or other vulnerable person
- Adequate training opportunities are available
- Wunan welcomes external scrutiny.

Wunan leadership will take the following action to safeguard children and other vulnerable people:

- Development and periodic review of child and other vulnerable people safeguarding policy
- Alignment of recruitment practices and processes with child safe and vulnerable people policy
- Mandatory training opportunities for staff
- Conduct of periodic child safe risk assessments of Wunan support services.

11. Community Engagement and Communication

Wunan has a responsibility to ensure all children, other vulnerable people, families and carers who use our services are kept appropriately informed about Wunan services and this policy. Wunan supports meaningful participation by children, families and communities. We encourage opportunities to express views and to be involved in decision-making and activities.

The process is to include:

- Providing families and carers with information about activities
- Seeking the views and involvement of parents/carers on issues that impact on their children
- Clear discussion of issues of '*abuse*' and '*neglect*' using language that is understood, culturally sensitive and adapted to the needs of local families
- Making contact as soon as an issue is identified and reporting back on outcomes.

It is important that children and their family should know who to talk with if they are worried or are feeling unsafe. Key messages are children and other vulnerable people have a right to feel safe at all times and should say 'no' to anything that makes them feel unsafe.

Wunan staff have a responsibility to:

- Have open, direct and age appropriate conversations with children and other vulnerable people about abuse, particularly the fact that children are not responsible for any abuse they may suffer

- Help children and other vulnerable people feel safe
- Enable children to freely express their views and opinions and be treated with respect
- Help children to identify adults who they trust, and feel they can go to when they are worried or feeling unsafe
- Encourage children to tell a trusted adult whenever they have a problem, feel unsafe or witness something they don't like
- Raise their awareness about when they feel safe and when they feel unsafe
- Teach children about acceptable and unacceptable behaviour and physical contact in a manner appropriate to their age and level of understanding
- Enable children to access protective behaviour training adapted to their needs
- Create opportunities and find safe places for children to share any concerns
- Follow up on children's concerns, and let them know what action has been taken
- Arrange appropriate support and/or counselling for children with unresolved issues
- Put appropriate complaints processes in place.

Wunan understands the importance of working with others to:

- Assist children to develop communication skills
- Create child-friendly meeting places where girls and boys feel relaxed, comfortable and have access to the facilities they need
- Cater to the needs of children with disabilities
- Ensure children are not discriminated against because of age, race, colour, gender, language, religion, opinion, social origin or disability
- Use inclusive and empowering, child-friendly language in everyday activity
- Supporting children and other vulnerable people to participate in evaluation and review processes.

12. Risk Management

Wunan will ensure a risk assessment is undertaken to identify and mitigate risks to child safety, including physical, emotional and online risks. We commit to the development of a WWVP risk management plan.

Wunan will not take decisions that knowingly put children at risk of harm. Risk identification will extend to consideration of physical, emotional, online spaces and the use of images and data. Staff and users of services are all expected to contribute to raising awareness of risks and to the promotion of a proactive risk management culture.

13. Staff Recruitment

The following procedures will apply:

- Job advertisements should state the organisation's child safe commitment and state requirements for reference checks and screening

- Written job descriptions and duty statements will outline expectations, responsibilities and accountabilities relating to the safeguarding of children and other vulnerable people
- Behavioural interview questions should include questions about child safe practice
- Candidates will receive Wunan's policy (this document) to pre-read before an interview
- Qualifications of applicants will be obtained and checked, where relevant
- Screening requirements are to be met ahead of appointment, except with the explicit approval of the CEO/

Screening requirements for Wunan employees who work with children and other vulnerable people are:

- Working with Children Check (WWCC)
- National Police Check (NPC).

An international police check should also be obtained (if available) from any country where a prospective employee resided for 12 months or more in the last 5 years. If information is not available, then additional reference checks should be obtained and written approval sought from the CEO before proceeding with an appointment. All NPC are to be refreshed every 2 years. Wunan will ordinarily meet or reimburse the cost of WWCC and NPC checks.

Where an NPC or IPC shows an offence that occurred more than 10 years ago it should generally be disregarded, with the critical exception of offences involving violence and/or offences against children. In these instances staff appointments will require the explicit written approval of the Wunan CEO after consulting other members of the leadership team.

Wunan staff will, in future, be required to formally acknowledge that they:

- have read, understand and agree to comply with this Policy and relevant associated guidelines
- authorise Wunan to undertake any necessary inquiries, including criminal record checks and reference checks, as part of their appointment or recruitment process
- Have their NPC refreshed every 2 years.

Partner organisations are required to have an equivalent processes where the partnership relates to service delivery to children and other vulnerable people.

14. Professional Development.

Keeping children and other vulnerable people safe is everyone's responsibility. In particular staff need to be informed of their responsibilities in helping to ensure the safety and wellbeing of others.

Wunan seeks to provide staff with a safe and supportive work environment. Staff can expect:

- Clear Job Descriptions
- Performance appraisal

- Supervision and oversight
- Established behavioural boundaries
- Professional development opportunities.

Wunan has identified the following desired learning outcomes for staff that work with children and other vulnerable people:

- Recognising indicators of child abuse
- Understanding legislative and policy requirements around child abuse prevention, identification, responding and reporting
- Practical application of Child Safe Principles in the organisation
- Identifying steps required to build and embed a child safe organisational mind set in the organisation
- Being a child safety champion within the organisation.

The expectation is that Wunan staff will have the capacity to:

- be skilled in engaging with vulnerable people
- be attuned to recognise signs of harm
- understand developmental needs
- build on strengths and capacities
- value and respect cultural identity.

Wunan seeks to:

- Equip staff by encouraging attendance at professional workshops, team training days, and peer discussions
- Build the practical skills of our workforce so that they recognise signs of harm and respond to disclosures and allegations.
- Develop a contemporary understanding of child development
- Recognise children's rights to feel safe and heard.

It is critically important that staff understand that they are not to:

- discriminate against, act in favour of or give excessive attention to particular children or other vulnerable people
- use language that is offensive, discriminatory, demeaning, shaming, culturally inappropriate, abusive or of a sexual nature
- engage in behaviour to shame, humiliate, belittle or degrade
- risk causing emotional or psychologically harm by exposing a child or other vulnerable person to family violence
- engage in sexual activity, or act in a sexually provocative manner with children, including paying for sexual services or acts
- condone or participate in behaviour with children or other vulnerable people which is illegal or abusive
- behave in a way likely to damage the reputation or operational capacity of Wunan.

Wunan and our partners have in-house resources to lead training related to WWVP. Services provided by Wunan are often delivered in partnership with other organisations. Instances include:

- Partnership with Key Assets, a children's services provider, to jointly deliver the Family Wellbeing and Support Service.
- Partnership with Save the Children to ensure that PaCE and the Halls Creek Youth Hub initiatives are informed by recognised best practice.

Through partnerships such as these Wunan is able to contribute to improving the way other organisations engage with Aboriginal and Torres Strait Islander children and their families. In particular, Wunan emphasises ways of working that recognise the cumulative impact of inter-generational grief trauma.

We also propose to engage Child Wise to assist with staff training, subject to funding. Child Wise deliver an intensive 2-day training program designed to give staff the skills and knowledge to lead child safeguarding practice in their organisations. It is relevant to staff who have a responsibility to lead the implementation of a child safe environment. The training equips participants to lead safety reforms within their organisations through exploration of the practical application of standards and principles. Contact details are as follows:

Child Wise
1300 CHILD WISE (1300 244 539)
info@childwise.org.au
www.childwise.org.au

Attachment 1: Definition of Terms

| Term | Meaning |
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| Child | Anyone under 18 years of age. |
| Code of Conduct | Document outlining expected behaviour, relationships, attitudes and responsibilities. |
| Criminal or Court Record | Any record of an offence, conviction or finding of guilt, on-the-spot fine for, or court order relating to: <ul style="list-style-type: none"> • an apprehended violence or protection order made against the person; or • one or more traffic offences involving speeding more than 30 kilometres over the speed limit, injury to a person or damage to property; or • a crime or offence involving the consumption, dealing in, possession or handling of alcohol, a prohibited drug, narcotic or other prohibited substance; or • a crime or offence involving violence against or the injury, but excluding the death of a person; or • a minor crime or offence involving dishonesty, other than those crimes or offences referred to in paragraph (3) of this clause. |
| Emotional abuse | Humiliating and degrading treatment such as name calling, constant criticism, belittling, persistent shaming, confinement and social isolation. |
| Exploitation | Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual or other purposes, including, but not limited to, profiting monetarily, socially or politically. |
| Grooming | Behaviour that involves a pattern of conduct consistent with grooming a child or young person for sexual activity, where there is no other reasonable explanation for such behaviour. |
| Harm | Anything which individuals, institutions or processes do or fail to do which directly or indirectly causes intentional or unintentional abuse or other detriment to children or other vulnerable people. |
| National Police Check | It provides a list of offences from a person's criminal history that can be disclosed. |
| Neglect | Failure to provide a child or other vulnerable person with the basic necessities of life such as food, clothing, shelter, medical attention or supervision, to the extent that the child's health and development is, |

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| | or is likely to be, significantly harmed. |
| Partners | Individuals, groups or organisations (including consortiums) that have a formal/contractual relationship with Wunan that involves any contact with children or other vulnerable people. |
| Partnership | A long-term relationship between two or more organisations based on mutually agreed objectives and a set of shared principles and accountabilities. |
| Person | Wunan director, employee, partner, contractor and/or volunteer. |
| Physical Harm | Use of violent physical force so as to cause actual or likely physical injury or suffering, (e.g. hitting, shaking, burning). |
| Police check | A formal inquiry made to the relevant police authority in each Australian State or Territory where it is known the person has resided, designed to obtain details of the person's criminal conviction or a finding of guilt in all places (within and outside Australia). |
| Privacy | <p>The meaning given to that term in section 3A of the <i>Australian Information Commissioner Act 2010 (Cth)</i>. Obligations in relation to privacy include not doing any act or engaging in any practice which would be a breach of an Australian Privacy Principle. Organisations are obliged to:</p> <ul style="list-style-type: none"> • co-operate with reasonable demands or inquiries made by the Information Commissioner in relation to the management of Personal Information • ensure that any person accessing personal information is made aware of, and undertakes in writing to observe, the Australian Privacy Principles. |
| Risk management | Process of ensuring that risks, especially those to children, are identified, aggregated and communicated to the Wunan leadership. |
| Serious Offence | A crime or offence involving the death of a person; a sex-related offence or a crime, including sexual assault (whether against an adult or child); child pornography, or an indecent act involving a child; a crime or offence involving dishonesty that is not minor; fraud, money laundering, insider dealing or any other financial offence or crime, including those under legislation relating to companies, banking, insurance or other financial services. |
| Serious record | A conviction or a finding of guilt for a serious offence, especially one involving violence and/or children. |

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| Sexual abuse | All forms of sexual violence including incest, early and forced marriage, rape, involvement in pornography, indecent touching, grooming, using sexually explicit language towards a child and showing children pornographic material.. |
| Vulnerable Person | Individual under the age of 18; or an individual aged 18 years and above who is or may be unable to take care of themselves, or is unable to take care of themselves, or is unable to protect themselves against harm or exploitation by reason of age, illness, trauma or disability, or any other reason. |
| Working with Children Check | An ongoing assessment of a person's eligibility to work with children based on known past police and disciplinary information. |
| Wunan Leadership | Board, CEO, General Managers and Program Managers. |

Appendix 2: National Principles for Child Safe Organisations

Background

The Royal Commission into Institutional Responses to Child Sexual Abuse (2013) was a national response to widespread community concerns about instances where organisations had failed to adequately protect children from sexual and other forms of abuse. The Commission emphasised that members of the public, children, youth, parents, carers, families and communities should be able to be confident that organisations working with children and other vulnerable people provide safe environments where their rights, needs and interests are paramount. Australia is also a signatory to the United Nations Convention on the Rights of the Child (1990). The Convention recognises that children and young people have a right to special protection because of their vulnerability to exploitation and abuse.

Following the Royal Commission the Australian Human Rights Commission was engaged by the Commonwealth Department of Social Services to lead work on the development of National Principles for Child Safe Organisations. The goal is to build organisational cultures that advance the safety and wellbeing of children and young people. More information on Child Safe Organisations can be accessed at: <https://www.humanrights.gov.au/child-safe>

In 2018 the Council of Australian Governments (COAG) endorsed a set of National Principles for Child Safe Organisations ([*National Framework for Protecting Australia's Children Third Action Plan \(2015-2018\)*](#)). The adoption and application of these principles is a significant milestone in promoting child safety and wellbeing. The National Principles emphasise the importance of creating work environments and practices that Aboriginal and Torres Strait Islander children and young people are more likely to access because they regard them as culturally safe.

The National Principles are:

- Child safety and wellbeing is embedded in organisational leadership, governance and culture.
- Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.
- Families and communities are informed and involved in promoting child safety and wellbeing.
- Equity is upheld and diverse needs respected in policy and practice.
- People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
- Processes for complaints and concerns are child focused.
- Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.
- Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
- Implementation of the national child safe principles is regularly reviewed and improved.
- Policies and procedures document how the organisation is safe for children and young people.

Wunan hereby commits to uphold each of these principles.

Principle 1: Safe Culture

Principle 1 states child safety and wellbeing is embedded in organisational leadership, governance and culture.

Wunan seeks to create a welcoming inclusive environment for vulnerable people and it promotes an organisational culture in which we accept our accountability for ensuring child safety. We recognise that when decisions are made by the Wunan leadership, it is important to think about how these decisions might affect the most vulnerable.

The Wunan Board provides an authorising environment that encourages the sharing of information about risks to children and other vulnerable people. However, the organisation's commitment to child safety and wellbeing extends across decisions and actions taken at all levels of the organisation.

Key areas for action:

- Championing and modeling a child safe organisational culture by making public commitments to child safety
- Developing, documenting, implementing and reviewing child safety and wellbeing policy
- A Code of Conduct to establish expected behavioural standards and responsibilities, including information sharing and record keeping.
- A Risk Management Plan that focuses on preventing, identifying and mitigating risks to children and other vulnerable people.

Indicators that this principle is being upheld are:

- Documents such as this policy, Code of Conduct, job descriptions, performance reviews and the Risk Management Plan will be current and reflect sound practice
- Decisions by the leadership will display attitudes that demonstrate a valuing of children and other vulnerable people, and a commitment to their physical and cultural safety and wellbeing
- Staff, children and other vulnerable people have a sound knowledge of children's rights, including their rights to feel safe and heard.

Principle 2: Active Child Participation

Principle 2 states children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.

Wunan recognises that children and other vulnerable people have a right to voice their opinions on issues and concerns that impact upon them, and to have others listen and take them seriously. We will create opportunities for them to contribute to and actively participate in decision-making processes that impact upon them. The organisation recognises that children and young people need to feel comfortable

before they are likely to participate in decision-making processes and communicate any concerns.

Our organisation will work to enable children and their families to understand what child safety and wellbeing mean in practice. Wunan will be active in enabling children and other vulnerable people to know about our commitment to their safety and wellbeing, and our work to enhance their access to relevant services.

Key areas for action:

- Informing children and young people about their rights and responsibilities, especially their right to safety and participation
- Enabling children and other vulnerable people to feel socially connected by encouraging friendships and peer support
- Providing children and other vulnerable people with access to age appropriate information about sexual abuse and its prevention
- Facilitating appropriate means by which children and other vulnerable people might express their views and concerns.

Indicators that this principle is being upheld:

- Resources and services provided raise awareness amongst children and other vulnerable people of their rights and responsibilities
- Platforms are established that enable children and other vulnerable people to express their views and actively participate in decision-making, including decisions relating to the identification of risk and safety
- Staff are trained to understand the developmental needs of children and other vulnerable people
- Children and other vulnerable people have access to friendly and welcoming environments in which they can engage and interact with each other and trusted adults and friends.

Principle 3: Informed Families

Principle 3 states families and communities are informed, and involved in promoting child safety and wellbeing.

Families have the primary responsibility for raising and protecting children and other vulnerable people. There are several ways in which Wunan will seek to assist and involve families and the wider community to fulfil their responsibilities for child safety and wellbeing. We will:

- help to inform parents and carers about safeguarding children and other vulnerable people
- encourage conversations about child safety and wellbeing
- invite feedback and input.
- Families provide children and other vulnerable people with a primary protective network. Family structures vary greatly, with different family members playing different roles in a child's life. Families and carers may be well placed to:

- advise about needs and capabilities
- inform organisations about practices and environments that are safe and where they feel that their culture and identity are respected.

Key areas for action:

- Encourage families to have their say and contribute to decisions, policies and practices affecting their children
- Open communication with families and the wider community about child safety
- Making relevant information accessible.

Indicators that this principle is upheld:

- Wunan demonstrates that it is responsive to the needs of families and communities
- Families and communities are encouraged to participate in decision-making and provides feedback on safety and wellbeing issues that arise
- Wunan provides clear and accessible information to families and the community about child safety, policy, record keeping practices, and complaint and investigation processes
- Wunan supports approaches that build cultural safety through partnerships and respectful relationships.

Principle 4: Promote Equity and Diversity

Principle 4 states that equity is upheld and diverse needs respected in policy and practice.

Wunan seeks to build an organisational culture that works in a child centred way, acknowledges strengths and individual characteristics, and embraces everyone regardless of their abilities or social, economic and cultural background. We recognise the diverse circumstances of children and vulnerable people no matter who they are, where they live, what their parents do, what language they speak, what their religion is, and regardless of their gender, the cultural group they belong to, and whether or not they have a disability, and irrespective of whether they are poor or have means.

Wunan strives to present itself as a welcoming organisation. All children and other vulnerable people should feel included, comfortable and culturally safe in our presence. Wunan will work actively work to reduce the risk of discrimination, exclusion, bullying and abuse.

Key areas for action:

- Wunan will provide support and responds to the particular circumstances of children and other vulnerable people
- Wunan will ensure that children and other vulnerable people have access to complaint processes that are culturally safe, accessible and easily understood
- Wunan will pay particular attention to the needs of Aboriginal and Torres Strait Islander children, those with disability and those unable to live at home.

Indicators that this principle is upheld:

- Wunan policies will promote inclusion, equity and respect the diversity, safety and wellbeing of children and other vulnerable people
- Wunan will disseminate child-friendly material in accessible language
- Children and other vulnerable people will be informed about complaints processes available to them
- Wunan staff are trained to recognise and respond effectively to the needs of children and other vulnerable people
- Board members and staff will champion attitudes and behaviours that demonstrate respect for children and other vulnerable people
- Board members and staff will proactively respond to instances of discrimination and exclusion, regardless of whether or not they were intentional or unintentional.

Principles 5: Screen and Develop Staff

Principle 5 states that people working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.

Children and other vulnerable people should feel confident about the standards of care and service they receive, particularly in relation to their health and safety. Wunan understands that recruitment and staff development, including appropriate screening, provide the foundation for a safe organisation. Staff training needs to encompass induction, record keeping, understanding child safety responsibilities, cultural safety, appropriate staff supervision, information sharing practices and reporting requirements.

Before engaging or deploying any person - whether as an officer, employee, contractor, or volunteer - in relation to any aspect of working with vulnerable people, Wunan will:

- require a NPC or similar report for that person provided by an appropriate authority
- confirm that no Commonwealth, State or Territory law prohibits that person from being engaged in a capacity where they may have contact with Vulnerable People;
- comply with all legal requirements in any place where working with vulnerable people activities will be conducted (in part or in full) related to engaging or deploying persons in a capacity where they may have contact with Vulnerable Persons
- inform the person in writing that Wunan may pass the results of a National Police Check on to other agencies for the purposes of assessing whether consent should be given to the person having contact with vulnerable people.

Wunan is required to comply with relevant State and Territory legislation requiring screening for persons who work with Vulnerable People. The requirement is that all individuals undergo a National Police Check for Working with Children in addition to any other checks undertaken in compliance with State and/or Territory legislation.

Wunan maintains records of all WWCC and NPC checks and these are made available and accessible for viewing by external bodies upon request.

Where a WWCC or NPC or other relevant check indicates that a staff member has a serious record, or a criminal or court record that person is not allowed to be involved in working with vulnerable people activities. The Wunan CEO or their delegate will be the sole arbiter of whether a prospective or current Wunan staff member has a serious record. The suitability of an individual to participate in an activity will, in some cases, involve partner organisations and funding bodies.

If, at any stage during the term of a funding agreement, Wunan becomes aware that a staff member working with vulnerable people is charged or convicted of an offence, Wunan must immediately notify partner organisations and the funding body of the nature of the charge or conviction.

Wunan will comply with relevant State and Territory legal requirements regarding the involvement of persons with Working with Vulnerable People activities.

Key action areas for action:

- Recruitment, including advertising, referee checks and staff pre-employment screening (WWCC and NPC) processes will all place emphasis on the safety and wellbeing of children and other vulnerable people
- Induction and training processes will ensure that staff are aware of their responsibilities to children and other vulnerable people
- Staff supervision processes will maintain a sharp focus on the safety and wellbeing of children and other vulnerable people

Indicators that this principle is upheld:

- Wunan states its commitment to child safety and wellbeing when advertising, recruiting and screening staff and prospective staff.
- Job descriptions and selection criteria reinforce Wunan's commitment to safety, protection and wellbeing
- Processes are in place to ensure all staff have completed background check requirements and organisational records are up to date
- Staff understand policy and procedures relating to vulnerable people.
- Staff support, supervision and performance appraisal processes encompass child safety
- The organisation maintains suitable record keeping systems
- Wunan identifies risk and utilises tools and processes to mitigate it.

Principle 6: Complaint Processes

Principle 6 states processes to respond to complaints and concerns are child focused.

Wunan's policies and practices should be accessible by, responsive to and understood by children, other vulnerable people, their families, and staff. Training helps staff to recognise and respond to issues of neglect, grooming and other forms

of harm, and to provide appropriate support to children and other vulnerable people should it occur. Training can also assist Wunan staff to appropriately respond to different types of complaints, privacy considerations, disclosures of harm and reporting obligations.

Wunan will immediately notify partners and funding bodies if it becomes aware of:

- any breach or possible breach of its obligations
- a disclosure of personal information that may need to be passed on to another authority as required by law
- an approach by the Information Commissioner or similar position or by a person claiming that their privacy has been interfered with.

Key areas for action:

- Ensuring the organisation has child friendly complaint handling practices
- Ensuring that staff understand legal obligations relevant to their jurisdiction and cooperate fully with authorities
- Wunan will make strenuous efforts to ensure that complaint handling processes are understood by children, other vulnerable people, their families and staff
- Complaints will be taken seriously, and responded to promptly and thoroughly.
- Wunan meets reporting, record keeping, privacy and other legal obligations.

Indicators that this principle is upheld:

- Staff are well-informed about their roles and responsibilities with respect to reporting, privacy obligations and disclosures
- Policies and procedures have regard for fairness to all parties to a complaint or investigation
- Staff understand that children and other vulnerable people might express concerns or distress, and disclose harm in different ways
- Any complaints, concerns and breaches are recorded and systemic issues identified and mitigated
- Children and other vulnerable people know who to talk to if they are feeling unsafe and understand the process of what will happen.
- Timely feedback is provided to children, other vulnerable people, families, and staff who may choose to report an incident or raise a concern or complaint.

Principle 7: Training

Principle 7 states staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through the provision of information, and ongoing education and training.

Wunan recognises the importance of ongoing education and training. Staff will have opportunities to build on their knowledge and skills and, over time, acquire understandings of evidence-based practice tools through participation in seminars and workshops, discussions with peers, and team training. This will ensure staff develop a contemporary understanding of child development, safety and wellbeing.

The expectation is that they will come to be able to identify indicators of child harm, respond effectively in culturally appropriate ways to the needs of children and other vulnerable people and their families, especially those who show signs they may be experiencing harm.

Key areas for action are:

- Staff are trained and supported to effectively implement policy
- Staff receive training to recognise indicators of child harm, including child sexual abuse, and harm that may be caused by other vulnerable people
- Staff receive training to respond effectively to issues of child safety and wellbeing, including disclosures
- Staff receive training and information on how to build culturally safe environments for children and other vulnerable people.

Indicators that this principle is upheld:

- The organisation provides regular opportunities to train staff about child safety and wellbeing, including policies and procedures, and evidence-based practice
- Wunan provides a supportive and safe environment in which staff may disclose harm or risk to children and other vulnerable people
- Staff recognise the indicators of child harm
- The whole organisation responds effectively when issues of child safety and wellbeing or cultural safety arise.

Principle 8: Safety and Wellbeing

Principle 8 states that physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.

Children and other vulnerable people may get information relevant to their safety and wellbeing from various sources, including radio, on-line and word of mouth. Staff should make sure that the information children access is age appropriate and help them to understand the information.

Wunan understands the importance of reducing the risk of harm in physical and online environments. Risks are minimised through education of children and other vulnerable people, their families, and staff about appropriate online behaviour.

Key areas for action:

- Ensuring that staff identify and mitigate risks in the online and physical environments without compromising a child's right to privacy, access to information, social connections and learning opportunities
- The online environment is used in accordance with the organisation's Code of Conduct and child safety and wellbeing policy and practices.
- The WWVP Risk Management Plan considers risks posed by organisational settings, activities, and the physical environment

- the application of safety filters.

Indicators that this principle is upheld:

- Wunan's risk management strategy addresses physical and online risks, and risks arising from child to child and adult to child interactions
- Staff are proactive in identifying and mitigating risks
- Children and other vulnerable people and their families are informed about safety
- Other service providers and contractors have appropriate measures in place to ensure the safety and wellbeing of children and other vulnerable people.

Principle 9: Continuous Improvement

Principle 9 states that implementation of national child safe principles is regularly reviewed and improved.

Wunan seeks to continuously improve delivery of its services to address challenges. We conduct periodic reviews and evaluations, within the scope of our available resources. The participation and involvement of children, other vulnerable people and their families is regarded as an effective means of strengthening Wunan's safeguarding capacity and organisational performance. Wunan supports the sharing of good practice and lessons learnt.

Key areas for action by Wunan:

- The organisation will regularly review, evaluate and improve its practices
- Any complaints, concerns and incidents are seen as opportunities to identify systemic failures so as to inform a process of continuous improvement
- The organisation makes findings available to staff, families and community members.

Indicators that this principle is upheld:

- Wunan will create opportunities for the participation of children and other vulnerable people, their families, and community in reviews and evaluations of policies, programs, procedures and practices.
- Wellbeing and safety KPI's are developed and being used.
- The findings of reviews and evaluations are considered and implemented to improve child safe practices
- Complaints and reporting lead to improvements in safe practice.

Principle 10: Documented Policies and Procedures

Principle 10 states policies and procedures document how the organisation is safe for children and young people.

Wunan commits to helping families to protect their children and to creating a socio-economic environment where they can reach their potential. Clearly expressed policy ensures that all stakeholders are aware of how Wunan is planning to meet its

obligations to contribute to an environment that is safe for children and other vulnerable people.

Consistent application of documented policies and procedures will ensure child safe practices across the organisation. Partner organisations funded to provide services to children and young people should also demonstrate adherence to child safety and wellbeing policies and practices.

Key areas for action:

- Policies and procedures will address all national child safe principles
- Policies and procedures will be documented and easy to understand
- Knowledge of best practice models will inform the development of policies and procedures
- Consultation with stakeholders will inform the development of policies and procedures
- Leadership will champion and model compliance with policy and procedure.

Indicators that this principle is upheld:

- Wunan's policy is comprehensive, addressing all ten National Child Safe Principles
- Policy and procedures are documented in a language and format that is easily understood and accessible to staff and other stakeholders
- Practice within the organisation is consistent and compliant with its policies and procedures
- Interviews or surveys of children and young people, families and community members inform Wunan's efforts to promote a safe organisational culture.
- Staff are proactive in implementing policies, procedures and practice requirements.

Attachment 3: Wunan Staff WWVP Statement

I, (insert name) acknowledge that I have read, understand and agree to comply with Wunan's Working with Vulnerable People (WWVP) policy.

I understand that it is my responsibility as an employee engaged by Wunan to avoid actions that are abusive or exploitative of children and young people or could be construed as such.

I know what process to expect should a report be made by me or an allegation made against me.

I understand that a breach of the policy may provide grounds for my employment to be terminated. I also understand that a breach of this policy could result in criminal prosecution.

I authorise the Wunan Foundation Inc to undertake any necessary inquiries, including criminal record checks and reference checks, as part of the appointment or recruitment process.

Name:

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Signed:

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Date:

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