North West Queensland Indigenous Community Social Services Limited

Child and Youth Risk Management Strategy

NWQICSS

Introduction

At the heart of the North West Queensland Indigenous Community Social Services Limited (NWQICSS) approach to safeguarding is our commitment to protecting the safety, wellbeing, and dignity of all children, young people, and vulnerable adults in our care and in our communities.

Our **Safeguarding Risk Management Strategy** is developed in line with the requirements of the *Working with Children (Risk Management and Screening) Act 2000* and other relevant legislation and standards. This strategy reflects our **zero-tolerance** stance on any form of abuse or neglect.

NWQICSS delivers a range of community, cultural, and family services across North West Queensland, and safeguarding is a shared responsibility across all staff, volunteers, contractors, and community partners.

Purpose

The purpose of this strategy is to set out clear procedures for safeguarding across all NWQICSS programs, services, and activities. It demonstrates that safeguarding is embedded in our organisational culture and practices, and that all staff and volunteers understand their responsibilities.

Safeguarding is everyone's responsibility. Our managers, team leaders, and coordinators will ensure there is documented commitment and consistent processes in place to keep children, young people, and vulnerable adults safe at all times.

The strategy includes the following eight procedures:

Responsibilities

The roles and responsibilities of all NWQICSS personnel in safeguarding children and vulnerable adults are outlined within these procedures. They include:

- **Compliance** with legislation, policy, and the Blue Card system.
- **Monitoring** adherence to safeguarding practices across all sites.
- **Reporting** concerns, disclosures, or breaches immediately.
- **Records management** for safeguarding-related matters.
- **Education and training** for all personnel.
- **Promotion of safeguarding** across programs, community engagement, and cultural activities.

Definitions

Abuse – Violation of a person's rights through physical, sexual, psychological, emotional, spiritual, legal, financial abuse, neglect, exploitation, and/or exposure to family violence.

Grooming – Establishing a relationship with a child, young person, or vulnerable adult (and sometimes their family) to lower inhibitions with the intent to commit sexual abuse.

Duty of Care – A legal and ethical obligation to take reasonable steps to prevent foreseeable harm.

Exploitation – Taking advantage of a person's vulnerability or disadvantage for personal or organisational gain.

Harm – Any detrimental effect of a significant nature on a person's physical, psychological, or emotional wellbeing, regardless of the cause.

Neglect – Failure to provide adequate care, supervision, or support to meet a dependent person's basic needs.

Safe Environment – A setting where the safety, dignity, and cultural identity of all people is protected and respected, including culturally safe spaces for Aboriginal and Torres Strait Islander peoples.

Vulnerable Adult – Any person aged 18 years and over who may be at increased risk of abuse due to age, disability, mental illness, cognitive impairment, history of trauma, cultural background, power imbalances, or social isolation.

Child – Any person under the age of 18, including young people transitioning to adulthood.

NWQICSS Personnel – All employees, volunteers, contractors, student placements, and any other persons engaged by NWQICSS to deliver services.

Review

This strategy will be reviewed annually, or earlier if required, to reflect legislative changes, best practice standards, community feedback, and cultural considerations.

Feedback will be sought from staff, volunteers, children, young people, families, Elders, and community members through:

- Regular safeguarding training sessions.
- Consultations with community advisory groups.
- Program evaluations and cultural safety reviews.

The latest version of this strategy will always be available on the NWQICSS website and in printed form at our service location.

1. Statement of Commitment

Statement of Commitment:

North West Queensland Indigenous Community Social Services will do everything within its power to provide a safe environment for children and vulnerable adults to minimise the possibility of any harm. NWQICSS commits to a zero tolerance approach to any form of abuse and reflects this commitment in its procedures.

We give priority of place to the welfare and well- being of children and vulnerable people. The voices of our most vulnerable should be heard and listened to so we see reality through their eyes.

North West Queensland Indigenous Community Social Services believes that children and vulnerable people have a right to dignity of life, respect and security from physical, emotional, spiritual and psychological harm.

ROLE	RESPONSIBILITIES
Chief Executive Officer	- Ensure Statement of Commitment is visible to the public throughout NWQICSS; - Provide a copy of Statement of Commitment to all new personnel; - Ensure any group, club, school etc. NWQICSS facilities have been made aware of the Statement of Commitment and this is documented through third party agreements.
Personnel	- Ensure understanding of this Statement of Commitment and promote this message at every opportunity; - Engage in conversation as people make comment, raise questions or concerns about this and encourage them to discuss with CEO, Manager/Coordinator or Safeguarding Officer.
Safeguarding Officer	- Communicate feedback, updates and changes to Statement of Commitment in consultation with NWQICSS leadership and Board members; - Encourage constructive discussion and awareness of Statement of Commitment through NWQICSS meetings, training and forums, consultations and gatherings; - Ensure Statement of Commitment material is printed and provided to all NWQICSS programs.

2. Safe Conduct Standards

'Respecting & Protecting Children & Vulnerable Adults'

North West Queensland Indigenous Community Social Services is committed to safeguarding everyone involved in its programs, but gives special priority to the safety & wellbeing of children & vulnerable adults. Therefore, all NWQICSS personnel are expected to conduct themselves in accordance with these standards in all interactions with children & vulnerable adults, including on line. These standards are also to be read in conjunction with other relevant NWQICSS behaviour standards or codes of conduct.

Child - a person under 18 years of age.
Vulnerable Adult (adults at risk) - Any individual aged over 18 years who due to their diverse circumstances and experiences, may place them at increased risk of abuse or exploitation.

I will:

- Promote the rights & safety of children & vulnerable adults
- Comply with policies & procedures that safeguard children & vulnerable adults
- Treat children & vulnerable adults with respect & dignity
- Respect & protect the privacy of children & vulnerable adults
- Comply with Diocesan protocols for communicating with children & vulnerable adults
- Maintain proper personal & professional boundaries with children & vulnerable adults
- Listen & respond to the views & concerns of children & vulnerable adults
- Respect cultural & religious differences of children & vulnerable adults
- Identify & manage risks to the safety & wellbeing of children & vulnerable adults
- Promptly respond to any concerns or complaints of abuse or harm to children & vulnerable adults
- Report all suspected or disclosed abuse or harm to children or vulnerable adults in accordance with Diocesan protocols
- Comply with legal reporting obligations in respect to suspected abuse or harm to children or vulnerable adults
- Report any suspected breaches of these conduct standards

I will not:

- Engage in any unlawful activity with or in relation to a child or vulnerable adult
- Engage in any activity that is likely to physically, emotionally, sexually or spiritually harm a child or vulnerable adult
- Expose a child or vulnerable adult to sexual videos or images
- Use harsh or offensive language towards or in the presence of a child or vulnerable adult
- Unlawfully discriminate against a child or vulnerable adult or their family or carers
- Be alone with a child or vulnerable adult unnecessarily
- Engage in unnecessary physical contact with a child or vulnerable adult
- Use physical violence or corporal discipline on a child or vulnerable adult
- Supply liquor or a prohibited drug to a child or vulnerable adult
- Engage with children while under the influence of liquor or a prohibited drug
- Arrange personal contact, including online, with a child or vulnerable adult for a purpose not related to my ministry or work with the Diocese
- Receive, produce or share sensitive information about a child or vulnerable adult, including images, unless I have proper consent or am authorized to do so legally or under Diocesan policy
- Ignore or disregard suspected or disclosed abuse or harm to a child or vulnerable adult

Roles and Responsibilities

Role	Code of Conduct Management Policy responsibility	Frequency
Board	• Approve Code of Conduct Policy.	Every three Years
Board and CEO	• Review Code of Conduct Policy.	Every three Years
Board	• Review and endorse organisational Codes of Conduct and breach management processes.	Every three years
Senior Management	• Responsible for implementing Codes of Conduct and breach management processes for their Center/program. • Provide advice and communicate this Policy to all Center/program staff and volunteers. • Receive reports of non-compliance and report all instances of serious non-compliance to the CEO. • Advise the CEO of any Code of Conduct breaches/reports that constitute a high level or strategic risk, in accordance with the NWQICSS Risk Management Policy. • Coordinate Code of Conduct training for personnel within the Center/program.	Ongoing
Senior Management	• Advise the organisation staff and committees of this Policy and its compliance. • Approve engagement by personnel in any secondary employment or business activity.	As required
CEO	• Policy Manager of the Code of Conduct Policy. • Advise all Centers/programs covered by this policy and its enacted date. • Review the Code of Conduct Management Policy and Process every three years or sooner, in consultation with the Board.	Every three Years
Safeguarding Officer	• Facilitate Code of Conduct training for personnel where required.	Ongoing
Staff Services	• Establish and maintain the Conflict-of-Interest Register for organisation's personnel. • Holds the NWQICSS Conflict of Interest Register.	Ongoing
External Review (external provider)	• Third party review of Code of Conduct Policy and Process. • Code of Conduct Management Health Check, to determine the adequacy of nominated controls, and identification of Code of Conduct breaches.	Every two years

3. Safe People Safe Practices and Safe Places

ROLE	RESPONSIBILITIES
Staff Services	• Apply the Safeguarding Recruitment Checklist for selection practices in NWQICSS to assist in appointing suitable paid staff and volunteers and fully inducting them in safeguarding policy and procedures; • Ensure all existing staff are inducted and trained in safeguarding policy and procedures and evidence of this training is documented; • Ensure all newly appointed volunteers are inducted and have signed the Volunteer Agreement; • Liaise with Safeguarding Officer to ensure all paid staff and volunteers who work directly with children and/or vulnerable adults, attend face-to- face training when requested; • Maintain records relating to safeguarding induction and training;
Personnel	• Ensure understanding of the priority to protect children and vulnerable adults, irrespective of what role it is in NWQICSS. All personnel has a responsibility in safeguarding and complying with this procedure. • Commit to fully participate in safeguarding training and information sessions and audits as they occur to ensure continual learning and improved safeguarding practice; • Engage in constructive conversation as people make comment or raise questions or concerns about safeguarding and encourage them to understand that safeguarding is everyone's responsibility.
Safeguarding Officer	• Support as required, NWQICSS Staff Services to prepare for the recruitment of new paid staff and volunteers; • Provide resources as required including the safeguarding policy and procedures and information resources and tools to promote to all personnel that safeguarding is everyone's responsibility; • Work with internal and external stakeholders as identified to provide initial and ongoing training to all personnel.

1. Safe People, Safe Practices & Safe Places - procedure outline:

1.1. Pre-employment Recruitment

1.1.1. NWQICSS management must be familiar with the safeguarding policy and procedures before any new paid or volunteer is recruited and appointed;

1.1.2. The Safeguarding Recruitment Checklist should be applied for new personnel working with children and vulnerable adults if existing formal processes are not engaged and documented;

1.1.3. Applicants must be informed that they will be subject to Blue Card screening if their work is directly working with children or making decisions for children (as part of their role). The **'No Card, No Start'** laws applies.

1.1.4. Applicants for all paid positions must be informed that as part of their employment agreement, they will be required to be in receipt of a positive National Police Check prior to commencement of employment. Consideration must also be given to undertaking this check for volunteers, especially if they are working with vulnerable adults and there are no other risk controls in place. The Safeguarding Officer can facilitate checks being undertaken. Costs for National Police Checks will be costed back to NWQICSS.

1.1.5. All personnel, prior to their appointment working with vulnerable people, must complete a **Safeguarding Declaration Form** which serves as a safeguarding measure for suitability to the role.

1.2. Pre-employment Selection

1.2.1. An interview process when selecting new paid staff and volunteers must be conducted for staff when the role is working directly with children and vulnerable adults. The **Safeguarding Declaration Form** can be used to assist with the questions;

1.2.2. Referee checks are a vital part of the selection process and checks are to be carried out with the applicant's recent employer. If a written reference is provided, then contact should be made with the referee to verify the information and authenticity;

1.2.3. A probationary period of employment to allow assessment on performance and suitability of a new paid staff member or volunteer should be made clear to the applicant prior to their appointment. A probationary period of six (6) months is recommended. Any meetings to discuss performance and suitability should be documented and advice sought from the CEO.

1.3. Post-employment Induction and Training

1.3.1. Safeguarding material including policy and procedures must be made available to all new paid staff and volunteers on their appointment and can be accessed through the SALT training platform;

1.3.2. Induction training for all newly appointed paid staff must occur as part of the on-boarding process. This includes receiving safeguarding material, completing the 'safeguarding essentials' on-line training for paid staff. NWQICSS, through Staff Services is responsible for staff complying with safeguarding on-boarding and training requirements;

Face-to-face training will be required for all personnel working directly with children and vulnerable adults which will be provided and occur at least every three years.

Targeted training and review on safeguarding policy and procedure will occur after a critical incident or if a significant risk or breach is identified.

1.3.3. The Volunteer Handbook must be provided to all new volunteers for their induction. Signed Volunteer Agreement forms are to be managed and securely filed by Staff Services.

1.4. Post-employment management in safeguarding

1.4.1. NWQICSS when supporting children and vulnerable adults must promote their voice and participation in making the environment safe and to identify how NWQICSS

can better support and protect them. This can be done formally or informally through engagement opportunities with them, their family or significant others;

1.4.2. The views and feedback of children and vulnerable adults should be valued and documented so safeguarding policy and procedures take their feedback into account when being reviewed. It is important to ensure the Safeguarding Officer receives this feedback as soon as it is provided and when reviewing the overarching policy and procedures;

1.4.3. Supervision and goal setting for paid staff and volunteers is an important part of creating healthy and safe environment, as it: promotes inclusion and good performance; supports development and positive working relationships; addresses concerns as they arise; and it greatly helps protect children and vulnerable adults if concerning behaviours or patterns emerge. Supervision should always document the points of discussion including any issues raised and agreed actions. The value of general discussions and 'check-ins' (i.e. informal supervision) should also be acknowledged and supported.

1.5. Safeguarding Practices

1.5.1. *Two Adult Rule*: General safe practice in all activities, recommends the application of the *Two Adult Rule* which serves to keep children and vulnerable adults safe, as well as safeguarding NWQICSS personnel in carrying out their duties. Wherever practical no fewer than two adults should be present at all times during any NWQICSS program involving children or vulnerable adults. It is appropriate that these two adults are not directly related. This approach is an important safeguarding measure because it:

- Significantly reduces the risk of an incident of abuse occurring;
- Protects NWQICSS personnel against malicious allegations;
- Reduces the risk of an allegation of failing to protect;
- May encourage other people to volunteer if they know there will be assistance on a regular basis;
- Provides help to NWQICSS personnel if there is an accident or emergency;
- Sends a clear statement from NWQICSS that children and vulnerable adults are valued and we are committed to protecting them.

In some smaller NWQICSS programs there may be a capacity issue where this rule is not possible, or it may be that the timing of support provided does not allow for two approved adults to be present. In such circumstances, communication with the program manager is important or contact the Safeguarding Officer. Implementing a risk management plan with protective strategies will help safeguard. These include:

- Invite a parent or other suitable adult to join the activity to be the second supervising adult, ensuring they are not a 'restricted person' by signing the Safeguarding Declaration Form;
- Engage the child or vulnerable adult in open spaces (i.e. not in offices or meeting rooms);
- Communicate with Manager or Coordinator to detail the activity prior to it starting, call-in to an approved person throughout the activity and call again after the activity to ensure your time and location is accounted for;
- Take notes after the activity to document the events such as time, call-ins, witnesses etc. This will help provide confidence and reassurance that good practice in safeguarding is in place and risks are mitigated.

Note: These are just some examples of protective strategies to consider if the *Two Adult Rule* is not possible. You should discuss with your Manager, Coordinator or Safeguarding

Officer if you are unsure or worried and they can undertake a risk assessment.

1.5.2. Physical Contact – Physical contact with children may be required in some circumstances. These may include; management of a minor injury or engaging in sports activities such as soccer. Parent or guardian consent must be provided in writing where appropriate. If physical contact is required, then the *Two Adult Rule* must apply (by approved NWQICSS personnel) and an explanation provided to the child as to what physical contact will be and why. If there are any worries expressed by the child or any other person present, then there must be no contact made and the parent or guardian should be immediately contacted or further advice sought;

1.5.3. Transport of children – NWQICSS personnel must not transport children in their vehicles without written consent from the child's parent or guardian and they must have approval from their Manager. In the event that a child needs to be transported, for safety reasons the *Two Adult Rule* must apply with approved NWQICSS personnel. For any work involving the transportation of children, a log book must be maintained of the details, including the names of the children, ages, and pick-up and drop-off time. This log book must be signed by the coordinator at the completion of the activity for that day. All people travelling in a vehicle must wear seat belts, the driver should be appropriately licensed and the vehicles registered, insured and safe to drive. For children being transported, the *'Look before you Lock'* practice applies.

1.5.4. Parent or guardian consent for NWQICSS activity or events – Children under 18 participating in any activity or event which occurs as a one-off event or occurs away from NWQICSS facilities in public areas or private property, must have written consent from the child's parent or guardian. This should include information to the parent or guardian on where the event is held, duration, pick-up and drop-off details, medical conditions identified and what the management plan is for these conditions, and up-to-date emergency contact numbers. Transport of children consent also applies if required. Safeguarding Activity Consent Form

> **Important things to note**
>
> Ensure a risk assessment has been undertaken for the activity or event and this is documented in BrightSafe. If the risk is assessed as high, a risk management plan must be completed. The Safeguarding Officer is able to assist with this assessment and plan. To better support safer places, NWQICSS has established a specific **risk management procedure**

1.5.5. Change Rooms/Toilets – Children should be afforded privacy when using toilets and change rooms. Responsible practice requires that adequate and appropriate supervision be given to children in these circumstances. Approved supervising adults must work to maintain the privacy and respect of all individuals, such as announcing their presence before entering the area and only entering if absolutely necessary. For younger children requiring support going to the toilet (e.g. Children's Playgroup), parent or guardian consent in writing is required;

1.5.6. Photography/Video – During any activity it is not uncommon for parents, guardians or other children to take photos or videos (of their children or friends) at events. NWQICSS personnel should be aware that there is always a risk that images of children may be used inappropriately. At each event or activity it should be announced by the designated leader that sensitivity when taking images applies and parental or guardian written consent must always be sought. NWQICSS personnel must not receive, produce or publish any images (including photos, videos, artwork etc.) of children without authorisation from their manager

and never without parent or guardian consent, detailing what the publication is being used for.

1.5.7. Use of private space in accommodation – NWQICSS personnel and volunteers from time-to-time may need to share accommodation facilities with each other and therefore the Code of Conduct *always* applies.
Any shared accommodation between NWQICSS personnel and children and/or vulnerable adults must always include a risk assessment and risk management plan for the protection of all involved, including NWQICSS personnel – see Risk Management Procedure. Risk management plans must also be completed and reviewed for any physical environments under the NWQICSS's control or management, including buildings, structures, open spaces, grounds and arrangements for live-in carers/caretakers. Any concerns or worries prior to the event or accommodation arrangement should be communicated to the Safeguarding Officer;

1.5.8. 'Social media' is the term commonly given to web-based tools which allow users to interact with each other in some way by sharing information, opinions, knowledge and interest online. Social media builds online communities or networks to encourage participation and engagement. When using social media, NWQICSS personnel are bound by the *Safe Conduct Standards* and other relevant practices outlined in NWQICSS procedures, including this procedure;

1.5.9. NWQICSS has made resources and educational material available for children and for vulnerable adults which will provide information to help keep them safe. The NWQICSS Safeguarding Officer will facilitate these resources being made available as requested. For example a useful link is from the Office of the esafety Commissioner which promotes safer online experiences. The NWQICSS website: NWQICSS has useful links to resources and portals to assist.

4. Handling disclosures or suspicions of harm

ROLE	RESPONSIBILITIES
Chief Executive Officer	• Ensure this procedure is discussed at scheduled leadership meetings and gatherings; • Support and provide direction to personnel if concerns are disclosed to them or they suspect as per this procedure; • Utilise the Child Protection Guide to assist with decision-making for children and advise the Safeguarding Officer or follow NWQICSS procedure; • Ensure compliance with legislated mandatory reporting requirements including the *Failure to Report; Failure to Protect* laws in Queensland.
Personnel	• Be aware of signs of possible abuse and be alert to any sign of possible abuse or neglect of those who we are working with; • Report concerns to authorities such as Queensland Police Service if there is immediate risk of harm or a life-threatening situation and ensure compliance with legislated mandatory reporting requirements; • Inform key contacts within NWQICSS including CEO and Safeguarding Officer on any concerns received or observed – provided the concerns are not implicating that key contact person. Note: If there is a key contact person implicated in a concern received or observed, immediately contact the Safeguarding Officer or call Queensland Police Service if the matter is urgent or of a criminal nature.
Safeguarding Officer	• Support all teams to understand this procedure and the responsibility of all personnel to be informed on possible abuse and neglect; • Appropriately respond to disclosures or suspicions of harm received and support personnel to facilitate a notification to authorities as required; • Disseminate and educate on reporting using the complaints management flowchart; • Ensure completed *disclosures or suspicion of harm reporting* documents are confidentially filed and maintained for referencing if required by authorities.

1. Handling disclosures or suspicions of harm - procedure outline:

1.1. Defining Harm

 1.1.1. Harm is defined as 'any detrimental effect of a significant nature on the vulnerable person's physical, psychological or emotional wellbeing'. Harm can be caused by physical, psychological, or emotional abuse or neglect; or sexual abuse or exploitation;

 1.1.2. Harm can be caused by a single act or omission or a series of acts or omissions.

1.2. Identifying Harm

Types of Abuse Actions/behaviours by perpetrator	Resulting Harm Impact experienced by the vulnerable person
Physical Abuse • Hitting • Shaking • Burning/scalding • Biting • Causing bruise or fractures by excessive discipline • Poisoning • Giving children alcohol, illegal drugs or inappropriate medication • Domestic and family violence	**Physical** *Refers to the body* • Bruising • Fractures • Internal injuries • Burns
Psychological or Emotional Abuse • Scapegoating • Persistent rejection or hostility • Constant yelling, insults or criticism • Cultural affronts • Teasing/ bullying • Domestic and family violence	**Psychological** *Refers to the mind and cognitive processes* • Learning and development delays • Impaired self-image
Neglect • Not giving a vulnerable person sufficient food, housing, hygienic living conditions, health care and adequate supervision • Leaving children unattended • Children missing school	**Emotional** *Refers to the ability to express emotions* • Depression • Hypervigilance • Poor self esteem • Self-harm • Fear/anxiety
Sexual Abuse or exploitation • Kissing or holding a vulnerable person in a sexual manner • Exposing a sexual body part to a vulnerable person • Exposing vulnerable people to sexual acts or pornography • Having sexual relations with a child under the age of 16 or any behaviour of a sexual nature against a person (no matter their age) which is unwanted and takes place without consent.	

Note: This is not a complete list of the types of abuse and resulting harm, however this should be used as a tool for potential signs of harm and in such cases, ensure a report is made to the Safeguarding Officer.

1.2.1. **Disclosure of Harm** – A disclosure of harm occurs when someone, including a child, tells you about harm that has happened, is happening, or is likely to happen.

Disclosures of harm may start with:
- 'I think I saw…'
- 'Somebody told me that…'
- 'Just think you should know…'
- 'I'm not sure what I want you to do, but…'

It is important to act quickly and in the best interest of the vulnerable person after a disclosure of harm is received, irrespective of the alleged source of harm and especially if the vulnerable person is a child;

1.2.2. **Suspicion of harm** – A suspicion of harm is when someone has a reasonable suspicion that a vulnerable person has suffered, is suffering, or is at unacceptable risk of suffering significant harm. This includes circumstances which relate to an unborn child who may be in need of protection after he or she is born. A vulnerable person who has been, or may be experiencing, abuse may show behavioural, emotional of physical signs of stress and abuse;

You have a duty of care to follow up on any suspicions of harm or potential risk of harm to children and vulnerable adults in your care. This includes grooming behaviour towards a child. You can do this by observing and recording the actions of children or vulnerable adults and immediately reporting your concerns to the Safeguarding Officer.

You can suspect harm if:
- A child or vulnerable adult tells you they have been harmed;
- Someone else, for example another child, a parent, or an employee, tells you that harm has occurred or is likely to occur;
- A child or vulnerable adult tells you that they know someone who has been harmed (it is possible that they may be referring to themselves);
- You are concerned at significant changes in the behaviour of a child or vulnerable adult, or the presence of new unexplained and suspicious injuries;
- You identify behaviour that may be considered grooming behavior towards a child;
- You see harm happening.

1.3. Managing and recording a disclosure or suspicion of harm – refer to Flowchart and follow the detailed steps in this procedure

Important things to consider when receiving and managing a disclosure of harm

All personnel have a responsibility to be informed on what to do when managing a disclosure of harm. Key steps to note and apply are:

Receive:
- Remain calm and be welcoming to the

person. Respect:
- Listen attentively, supportively and non-judgmentally;
- Ensure a private conversation occurs, respecting confidentiality, whilst remaining in an open space if possible.

Record:
- Encourage the person to talk in their own words and ensure just enough open-ended questions are asked to act protectively (e.g. 'Can you tell me what happened'… or 'Can you tell me more about that'). Don't ask leading questions which tend to suggest an answer.
- Document the disclosure as clearly as possible – it may be more appropriate to wait until after the person has disclosed before documenting or they may give you permission to take notes. You should try and accurately record:
    o The relevant dates, times, locations of alleged offences and who was present;
    o Exactly what the person disclosing said, using 'I said,' 'they said' statements;
    o The questions you asked;
    o Any comments you made;

---

    o Your actions following the disclosure.
- Do not attempt to investigate or mediate an outcome. The Queensland Police Service may want to know the following:
    o Name, age and address of the vulnerable person making the disclosure;
    o Whereabouts of the vulnerable person at that point in time;
    o Any identifying information of the alleged perpetrator;
    o Details of person reporting the harm.

Reassure:
- If the person is a child ensure you advise and reassure them that the disclosure cannot remain a secret and it is necessary to advise someone in order to get help for them;
- Reassure the person they have done the right thing by telling you;
- If the person is over 18 years, explain that you would like to tell someone else who can help and seek their consent to report the concerns and to provide them support.

Refer:
- **If the child or vulnerable adult is in a life-threatening situation, you should immediately notify Queensland Police Service on 000.**
- If the person is over 18 and is **not** at risk of immediate harm, but does not seek assistance, provide the person with the details for support providers such as QPS, QAS, Lifeline, Blue Knot Foundation. If you have concerns about their mental health or decision-making capacity contact QAS;
- For a child under 18 years, mandatory reporting requirements apply. Contact the Queensland Police Service or Child Safety Services;
- In all cases you should advise the Safeguarding Officer who can assist in making the report to authorities, or follow the agency's reporting procedures where relevant.
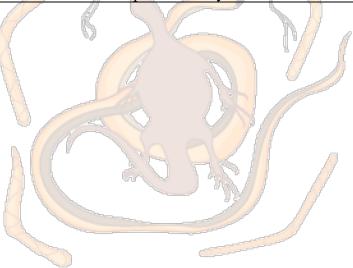
1.3.1. **Key Contacts** to notify when managing and recording a disclosure or suspicion of harm

- There are key contacts within NWQICSS who should be contacted once you have received and recorded a disclosure of harm or suspicion of harm, **however if you think the vulnerable person is in a life-threatening situation, you should immediately notify Queensland Police Service on 000.**

If you assess that the vulnerable person is not in immediate risk of being harmed, you should immediately notify the key contacts who are:

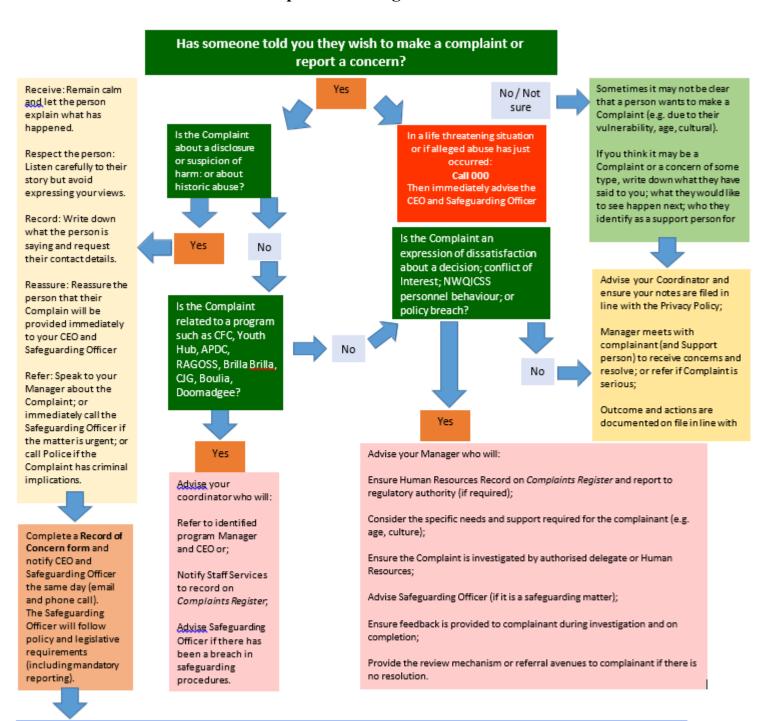- Chief Executive Officer; or
- NWQICSS Safeguarding Officer

Important things to note
Nothing that is written in these procedures below prevents any personnel, paid employee or volunteer or any other person from taking immediate action to notify Queensland Police Service and/or the Child Safety Services (**for children under 18 years**), particularly if he or she believes that it is essential to act to ensure a vulnerable persons safety.

Complaints Management Flowchart

Has someone told you they wish to make a complaint or report a concern?

Yes

No / Not sure

Receive: Remain calm and let the person explain what has happened.

Respect the person: Listen carefully to their story but avoid expressing your views.

Record: Write down what the person is saying and request their contact details.

Reassure: Reassure the person that their Complain will be provided immediately to your CEO and Safeguarding Officer

Refer: Speak to your Manager about the Complaint; or immediately call the Safeguarding Officer if the matter is urgent; or call Police if the Complaint has criminal implications.

Is the Complaint about a disclosure or suspicion of harm: or about historic abuse?

Yes   **No**

Is the Complaint related to a program such as CFC, Youth Hub, APDC, RAGOSS, Brilla Brilla, CJG, Boulia, Doomadgee?

Yes

Complete a **Record of Concern** form and notify CEO and Safeguarding Officer the same day (email and phone call). The Safeguarding Officer will follow policy and legislative requirements (including mandatory reporting).

Advise your coordinator who will:

Refer to identified program Manager and CEO or;

Notify Staff Services to record on *Complaints Register*;

Advise Safeguarding Officer if there has been a breach in safeguarding procedures.

In a life threatening situation or if alleged abuse has just occurred:
Call 000
Then immediately advise the CEO and Safeguarding Officer

Is the Complaint an expression of dissatisfaction about a decision; conflict of Interest; NWQICSS personnel behaviour; or policy breach?

No

Yes

Advise your Manager who will:

Ensure Human Resources Record on *Complaints Register* and report to regulatory authority (if required);

Consider the specific needs and support required for the complainant (e.g. age, culture);

Ensure the Complaint is investigated by authorised delegate or Human Resources;

Advise Safeguarding Officer (if it is a safeguarding matter);

Ensure feedback is provided to complainant during investigation and on completion;

Provide the review mechanism or referral avenues to complainant if there is no resolution.

Sometimes it may not be clear that a person wants to make a Complaint (e.g. due to their vulnerability, age, cultural).

If you think it may be a Complaint or a concern of some type, write down what they have said to you; what they would like to see happen next; who they identify as a support person for

No

Advise your Coordinator and ensure your notes are filed in line with the Privacy Policy;

Manager meets with complainant (and Support person) to receive concerns and resolve; or refer if Complaint is serious;

Outcome and actions are documented on file in line with

Safeguarding Officer facilitates next steps which may include:

- If an immediate report to Police, Child Safety Services or Public Guardian is required;
- If an immediate risk assessment and management plan is required to ensure safeguard measures are in place;
- Referral avenues for the complainant are provided;
- Investigation process undertaken by the relevant authority, monitor progress and await outcome;
- Findings and recommendations are considered and an action plan developed;
- Undertake review on relevant policy, procedures and systems; implement and report back to relevant stakeholders.

5. Managing breaches of the Risk Management Strategy

ROLE	RESPONSIBILITIES
Staff Services Coordinator/Manager Staff Services	• Ensure this procedure is included when all new paid staff and volunteers within NWQICSS receive their induction; • Report any significant breaches of the Safeguarding Risk Management Strategy to the CEO/Safeguarding Officer*;* • *Ensure all personnel are aware of who to contact and what the reporting guidelines are.*
NWQICSS personnel	• Ensure understanding of the priority to protect children and vulnerable adults, irrespective of what role it is in NWQICSS. All personnel has a responsibility in safeguarding and complying with this procedure. Any breaches must be reported to the CEO/Safeguarding Officer and Staff Services if the breaches are considered serious; • Engage in constructive conversation as people make comment or raise questions or concerns about safeguarding or this procedure and encourage them to discuss with Manager or Safeguarding Officer.
Safeguarding Officer	• Liaises with CEO and Staff Services on matters relating to complaints or disciplinary action on NWQICSS personnel; • Communicate updates and changes to this procedure in consultation with NWQICSS programs; • Encourage discussion and awareness of this procedure and to make time available to meet and discuss any concerns of breaches or potential breaches, working proactively and in partnership with all NWQICSS programs.

1. Managing breaches of risk management strategy - procedure outline:

1.1. Any minor breaches in safeguarding policy and procedures will be considered by the person with the responsibility to supervise the person who has or is alleged to have breached the policy and its procedures. For example, if a volunteer has breached the *Safe Conduct Standard*s in a program, the Manager and Safeguarding Officer will consider the seriousness of the breach and refer accordingly;

1.2. For any serious breach or potential breach of the safeguarding policy and its procedures, the coordinator of the person responsible must immediately notify the CEO and Safeguarding Officer;

1.3. For any disciplinary discussions, Staff Services must be notified to ensure procedural fairness and legislated requirements are followed;

1.4. Any person can notify on a breach or suspicion of a breach applying the Whistleblowers Policy and its guidelines. This can be done by contacting the delegated Whistleblower Protection Officers. All whistleblower reporting must be done in accordance with its guidelines.

6. Risk Management for settings, activities and physical environments

ROLE	RESPONSIBILITIES
Staff Services	• Ensuring this procedure is incorporated into the induction training for all relevant paid staff and volunteers within the program, service or agency, and that staff acknowledge their understanding and commitment to comply;
Management	• Leading and maintaining high standards of risk management practices within the service, including ongoing risk assessments and the development of safeguarding risk management plans for high-risk activities and special events; • Ensuring appropriate risk assessments and management plans are undertaken for any individual (outside of staff and volunteers) attending NWQICSS services or activities who is the subject of a substantiated complaint of abuse or has been convicted of an offence related to abuse; • Ensuring risk management plans are completed and reviewed for residential or office-sharing arrangements that may involve personnel living or working in close proximity with non-NWQICSS personnel; • Ensuring that all third-party service arrangements include a completed and signed Third Party Agreement, and that risks associated with those arrangements are assessed and managed.
NWQICSS personnel	• Understanding that the safety of children and vulnerable adults is a shared and non-negotiable priority. Every staff member and volunteer has an obligation to support safeguarding and participate in risk assessments for activities and events; • Engaging constructively in discussions where safeguarding concerns or questions arise, and encouraging open communication with their coordinator or the Safeguarding Officer.
Safeguarding Officer	• Communicate updates and changes to this procedure in consultation with all NWQICSS programs; • Encourage discussion and awareness of this procedure and to make time available to meet and assist in developing risk assessments and management plans with the responsible coordinators; • Ensure relevant NWQICSS personnel have been trained in this procedure, have understood and agree to comply by signing the receipt notice covering all safeguarding procedures.

1. Risk management for settings, activities and physical environments - procedure outline:

1.1. Proactive planning to identify and manage risks is essential to reducing the possibility of harm occurring to children and vulnerable adults. It is important to understand that for harm to occur, there must first be an opportunity for it. These opportunities can be minimised or eliminated through thoughtful preparation and the development of specific risk management plans for high-risk activities and special events.

1.2. Risk assessments and formal risk management plans must be completed for any setting, activity or

environment under the following conditions:

- The activity involves participation from volunteers or individuals external to NWQICSS (e.g. community members, guest facilitators, or external organisation's);
- The activity is held at an external venue or destination where there is a high attendance or increased hazard (e.g. venues with water hazards such as lakes, ponds, pools, or similar);
- The activity involves overnight stays or extends for a lengthy duration;
- The activity or service is provided to individuals or groups with complex needs or vulnerabilities (including children or adults with disability, trauma history, or at-risk status);
- If NWQICSS becomes aware that a person is participating or is intending to participate in a service or activity and they are subject of;
  - o   a substantiated complaint of abuse to a child or vulnerable person;
  - o   has been convicted of an offence relating to any form of abuse to a child or vulnerable

person; Other events such as community celebrations, camps, workshops, or conferences may also require risk management plans, depending on the nature and setting of the activity. If unsure, consult with the **Safeguarding Officer** for guidance.

1.3. **Risk Management Process**

1.3.1.   There are six (6) key steps to consider in the development of an effective risk management plan. They are:

1. *Describing the setting or activity* - should be outlined from start to finish and include the purpose of the activity, where its taking place, who is involved (i.e. children and/or vulnerable adults) and if there are external people assisting etc.;

2. *Identifying the risks* - should focus on how harm might occur and to whom. Involving and encouraging children and vulnerable adults to assist in identifying risks should occur where appropriate.

3. *Analysing the risks* - is important to determine the action and even if the activity is practical. There are two key steps to analysing risk:
   - How likely will harm occur? (Likelihood);
   - What would happen if harm did occur? (Consequences).

Likelihood	Almost Certain	Almost certain to occur in most circumstances
	Likely	Likely to occur frequently
	Possible	Possible and likely to occur at some time
	Unlikely	Unlikely to occur but could happen
	Rare	May occur but only in rare and exceptional circumstances

Consequences	Critical	• Critical incident. (e.g. Death or permanent disability of adult or child; high level of distress to other parties) • Sustained negative publicity or damage to reputation from a national perspective or from the community welfare perspective.
	Major	• Multiple injuries requiring specialist medical treatment or hospitalisation; and/or major occupational health safety & welfare liability incident / issue. • Major incident which damages public or parent confidence. • One or more children are lost from the main group.
	Moderate	• Serious injuries and/or illness. • Complex welfare and/or health care issue. • Serious disruption or incident, resulting in distress to children and adults.
	Minor	• Minor first aid or minor occupational health safety & welfare liability incident / issue (e.g. minor cuts, bruises, bumps). • Minor behavioural issues.
	Insignificant	• No treatment required.

4. E*valuate the risk* - it will depend on your answers in step 3. For example, if a risk is likely to occur and the consequences could result in major harm to a child or vulnerable adult, then this would be considered high risk. See below matrix.

Consequence / Likelihood	Insignificant	Minor	Moderate	Major	Critical
Almost Certain	Medium	Medium	**High**	**Extreme**	**Extreme**
Likely	Medium	Medium	**High**	**High**	**Extreme**
Possible	Low	Medium	Medium	**High**	**High**
Unlikely	Low	Low	Medium	Medium	**High**
Rare	Low	Low	Low	Medium	Medium

5. *Manage the risk* - is a cyclical process comprising of:
   - Assessing a risk treatment;
   - Deciding whether residual risk levels are tolerable;
   - If not tolerable, generating a new risk treatment;
   - Assessing the effectiveness of that treatment.

   Risk management planning should consider the values, cultural perspectives, and perceptions of all people involved—this includes NWQICSS personnel, service users, volunteers, and the broader community. Effective risk assessment and planning is essential not only for safeguarding children and vulnerable adults, but also for protecting staff and volunteers in the course of their work, and for maintaining the community's trust in NWQICSS as a safe, professional, and culturally respectful service provider. If a risk management plan identifies any high-risk elements that could potentially result in harm to a child or vulnerable adult, the Safeguarding Officer must be notified immediately so that further oversight, planning or mitigation strategies can be implemented;

   BrightSafe must be used when documenting your risk assessment and risk management plan. The plan must be signed off by the authorised person and provided to the Safeguarding Officer. To avoid duplication, the organisation's WHS risk management template (located on BrightSafe) may be used if the activity or event includes identified WHS risks as well as safeguarding risks;

   There is a specific risk assessment required for a high risk persons of interest and the Safeguarding Officer must be notified before a high risk person commences or continues in a program. A person is considered high risk if they are subject of a substantiated complaint of abuse to a child or vulnerable person; or they have been convicted of an offence relating to any form of abuse to a child or vulnerable person; or they have had their Blue Card suspended or withdrawn.

6. R*eview* - ongoing review is essential to ensure that the risk management plan is effective. Reviewing can be useful for future planning. A nominated person should be tasked with reviewing the risk management plan after the event or activity and the Safeguarding Officer is able to assist in this review.

7. Compliance with the requirement of the Blue Card System

ROLE	RESPONSIBILITIES
Staff Services and Safeguarding Officer	• Staff Services will work with the Safeguarding Officer to ensure compliance of the Blue Card register; • Staff Services will manage the Blue Card register and compliance with laws • Blue Card register is to be accurate, regularly checked (recommended that fortnightly checks with the Blue Card portal are carried out for Blue Card renewals and to ensure that none expire); • Ensure any concerns received on any personnel, or negative notices, cancellations or suspension notices received from Blue Card Services are reported to the Safeguarding Officer for an immediate risk assessment.
All staff and volunteers	• Ensure understanding of the priority to protect children irrespective of what role it is in within NWQICSS. Every paid staff member and volunteer has a responsibility in safeguarding and complying with blue card requirements. Any breaches must be reported to the CEO, Staff Services and Safeguarding Officer if the breaches are considered serious; • Engage in constructive conversation as people make comment or raise questions or concerns about safeguarding or this procedure and encourage them to discuss with their supervisor if required.
Safeguarding Officer Staff Services	• Communicate updates and changes to this procedure in consultation with NWQICSS centers; • Encourage discussion and awareness of this procedure and to make time available to meet and discuss any concerns of breaches or potential breaches, working proactively and in partnership with NWQICSS centers; • Monitor the Blue Card register for NWQICSS, for compliance, working with the nominated person and process applications as requested, and maintain an overarching NWQICSS register.

1. Compliance with the requirement of the Blue Card system - procedure outline: (Working directly with children under 18 years)

1.1. The Blue Card system is one important factor in a suite of strategies to safeguard children as they participate in programs, activities, and services. Blue Cards (including Exemption Cards) determine a person's **eligibility** to work with children and young people. It does not determine their overall **suitability**, which is why compliance with all safeguarding procedures is important. All personnel should ensure they are aware of this throughout their work as it will help identify risks as they arise and guide the steps to follow to safeguard children and young people;

1.2. It is NWQICSS responsibility to ensure that any person appointed to a role is appropriate for the position. This is achieved by following recruitment and selection processes contained within safeguarding procedures. Not all personnel will require a Blue Card. However, where a Blue Card is not required under Queensland legislation, the organisation will conduct a National Criminal History (Police) Check as an additional safeguard.

1.3. *Restricted Person* and *Restricted Employment* legislation has been introduced in Queensland. A restricted person must **not** start or continue in restricted employment under these changes. This change excludes a limited range of people from being able to carry out regulated child-related work in particular circumstances. NWQICSS must not employ or continue to employ a person in restricted employment if:
- The person is a restricted person; and
- NWQICSS knows, or ought to know, the employee is a restricted person.

1.3.1. A *restricted person* is a person who:
- Has been issued a negative notice; or
- Has a suspended blue card; or
- Is a disqualified person; or
- Has been charged with a disqualifying offence which has not been finalised; or
- Is the subject of an adverse interstate Working with Children check decision that is in effect.

1.3.2. *Restricted employment* provides exemptions to allow working with children without a Blue Card, such as:
- A volunteer parent;
- A volunteer who is under 18 years;
- Working with children for less than 7 days in a calendar year;
- A person with a disability who is employed at a place where the person receives disability services or NDIS supports or services; and
- A secondary school student on work experience who carries out disability related work under the direct supervision of a person who holds a Blue or Exemption Card.

1.4. Roles Requiring Positive Notice Blue Cards

1.4.1. Any role that involves working with children as part of its duties, or has a decision-making role with relation to children's activities or programs, requires a Blue Card. Roles that typically require a Blue Card include:

- Safeguarding Representative;
- Program Coordinator (children/youth);
- Children's activity facilitator;
- Youth workers;
- Trainer or supervisors for youth volunteers;
- Event leaders for activities involving children;
- Committee or council members making decisions on child/youth programs;
- Any other role that involves working closely with children and young people.

1.5. Exemptions

1.5.1. Police officers and registered teachers do not apply for a Blue Card and should instead apply for an *exemption card* under this category if they are providing child-related services which are outside of their professional duties.

1.6. Certain people are prohibited from applying for or renewing a Blue Card. The *Working with Children (Risk Management and Screening) Act 2000* (the Act) details who is a disqualified person and what disqualifying offences are by accessing their webpage on disqualified people from applying for a blue card.

A disqualified person must not:
- Sign a Blue Card application, or
- Make an application to run a regulated child-related business, or
- Work in child-related employment or carry on a child-related business that is regulated by the Act.

1.7. NWQICSS Staff Services Officer manages Blue Cards applications and works with the Safeguarding Officer to ensure the overarching register is accurate. Staff Services will manage the Blue Card register and compliance with laws and regulations;

2.0. **Blue Card Processes**

2.1. Managing Blue Card applications:

2.1.1. Staff Services must ensure paid personnel identified as requiring a Blue Card, have a valid Blue Card and these details are reflected on the overarching NWQICSS register.

2.1.2. Managing existing Blue Card holders – If a person is newly appointed and already has a Blue Card, the following must occur:
- *Verify the validity of the Blue Card;*
- Link the Blue Card to the organisation through the Organisation Blue Card portal;

2.1.3. If a person ceases working with NWQICSS, the Blue Card must be delinked via the Organisation Blue Card portal**.**

2.2. Managing changes in police information:

2.2.1. Management must ensure that personnel understand their obligation to advise if there is a change in their police information. Personnel are not required to disclose the specific nature of the change, only that a change has occurred;

2.2.2. If there has been a change in police information received by NWQICSS, the Safeguarding Officer must be notified to discuss the next steps and to ensure a risk assessment is undertaken.

2.3. Managing high risk individuals:

  2.3.1. Relevant notices must be kept in a confidential and secure file for notifications from Blue Card Services in relation to high-risk individuals, and that a copy of these notices are provided immediately to the Safeguarding Officer. Examples of high risk individuals include:

  - Negative notice is received or is a known disqualified person; or
  - Blue Card is cancelled or suspended; or
  - Blue Card application is withdrawn; or
  - A notification in relation to a serious change in criminal history is received from Blue Card Services.

  2.3.2. If any personnel has had a card cancelled or suspended or receives a negative notice after a change in police information, the Safeguarding Officer must be immediately advised for a risk assessment to be undertaken. The person must not continue to undertake child-related work within NWQICSS until a determination is made on their eligibility by Blue Card Services;

  2.3.3. Any consideration to the person undertaking non child-related work must be discussed with the Safeguarding Officer and documented accordingly. Consideration will be on a case-by-case basis as circumstances and the context of risk can vary. Blue Card Services may also provide advice on specific cases as required.

Important things to note
All information, including notices from Blue Card Services on high risk individuals, disqualified persons, Blue Card cancellation or suspensions or any notices or information received which could impact on a person's eligibility or suitability to work with children, must be immediately provided to the Safeguarding Officer. All documents received by the Safeguarding Officer will be confidentially documented in a secure file for monitoring and auditing purposes.

8. Communication and Support

ROLE	RESPONSIBILITIES

Staff Services CEO to identify and appoint who has the responsibility	• Ensure this procedure is included when relevant NWQICSS personnel receive their induction training and they acknowledge their understanding of this procedure; • Participate in *self-audits on the 10 Child Safe Standards* and discuss at scheduled board and Safeguarding Committee meetings to provide ongoing monitoring of safeguarding procedures and practice; • Ensure that as feedback on the Risk Management Strategy (these procedures) are received, it is recorded and provided in a timely way to the Safeguarding Officer. For significant matters which may require an immediate revision of safeguarding procedures, the Safeguarding Officer must be immediately notified.
All personnel	• Ensure understanding of the priority to protect children and vulnerable adults, irrespective of what role it is within NWQICSS. Every paid staff member and volunteer has a responsibility in safeguarding and complying with this procedure; • Engage in constructive conversation as people make comment or raise questions or concerns about safeguarding procedures and encourage them to discuss with Management or Safeguarding Officer.
Safeguarding Officer and CEO	• Ensure that management are aware of their responsibility to provide leadership and governance in developing a strong safeguarding culture within NWQICSS; • Communicates updates and changes to this procedure in consultation with NWQICSS centers; • Encourage discussion and awareness of this procedure and to make time available to meet and discuss any concerns or feedback, working proactively and in partnership with NWQICSS centers; • Support all NWQICSS centers to embed a strong safeguarding culture across the organisation; • Continue to work collaboratively with all NWQICSS personnel, centers and Professional Standards colleagues.

1. Communication and support - procedure outline:

1.1. NWQICSS has appointed a fulltime Safeguarding Officer to ensure safeguarding policies and the Risk Management Strategy are effectively communicated, supported, and embedded across all programs, services, and facilities;

1.2. Ongoing consultation occurs with all service areas in applying and continually improving the Safeguarding Children and Vulnerable Adults Policy. This includes documented meetings, regular reviews, and the completion of self-audit checklists aligned with relevant safeguarding standards, 10 Child Safe Standards

1.3. The Risk Management Strategy for the safeguarding of children and vulnerable adults is available on the organisation's website: NWQICSS

1.4. Safeguarding policy and procedures are reviewed annually, with feedback gathered and coordinated by the Safeguarding Officer. This occurs through:

- Consultations, involving children, young people, vulnerable adults, safeguarding representatives (where appointed), service leaders, community leaders, survivor advocates, and relevant committees;

- Agency meetings and self-audits and formal safeguarding committee processes;

- Participation in inter-agency and statewide safeguarding network meetings.

1.5. Safeguarding Representatives

    1.5.1.   Safeguarding Representatives play a supportive role in embedding safeguarding practices across the organisation. While their appointment is not mandatory, it is recommended to assist in effective implementation, communication, and the promotion of a strong safeguarding culture;

    1.5.2.   This is a voluntary role, but existing paid staff may undertake it alongside their duties. Key responsibilities include:
- Understanding and applying organisational safeguarding policies and procedures;
- Supporting managers, supervisors, and administrators in implementing safeguarding practices;
- Ensuring all personnel who work with children or vulnerable adults understand their responsibilities to protect and report concerns;
- Assisting with safe recruitment practices for paid staff and volunteers;
- Ensuring third-party groups using organisational facilities are aware of safeguarding obligations.

    1.5.3.   The Safeguarding Representative should be:
- Reliable, a good communicator, trustworthy, discreet and sensitive to the needs of children and vulnerable adults;
- Willing to assist and support in undertaking risk assessments for specific activities and events;
- Must have a current Blue Card and National Criminal History Check.

1.6. Safeguarding Representatives in Centers

    1.6.1.   Centers must prioritise *Safeguarding by ensuring*:
- A Safeguarding Policy (or similar policy) which is approved and publicly available;
- Ensuring that a Safeguarding Commitment Statement (or similar statement) is widely displayed and made publicly available;
- A strong safeguarding culture is created and maintained by the center leadership;
- Centers participate in the NWQICSS Safeguarding Committee;
- A Safeguarding Representative (or similar position) is appointed with clearly defined safeguarding roles and responsibilities;
- Personnel understand that good safeguarding practice is everyone's responsibility;
- Governance arrangements are transparent and include safeguarding roles and responsibilities to ensure accountability is clear;
- Centers have clear Code of Conduct behavioral standards;
- Risk management strategy has a clear focus on preventing, identifying and mitigating safeguarding risks to children and vulnerable adults.