

North West Indigenous Community Social Services Limited

Safeguarding Policy



NWQICSS

Policy Statement

1. NWQICSS believes that every person—regardless of age, gender, cultural identity, race, religious beliefs, disability, sexual orientation, or family or social background—has the right to live free from harm and to be treated with dignity and respect.
2. NWQICSS is committed to promoting and protecting the welfare, safety, and human rights of all people who interact with, or are impacted by, our work. We take a zero-tolerance approach to abuse, neglect, exploitation, harassment, and discrimination.
3. We adopt a survivor-centric and culturally safe approach in all that we do, ensuring that the rights, voices, and wellbeing of survivors—particularly Aboriginal and Torres Strait Islander peoples—are prioritised.
4. All staff, volunteers, contractors, partners, and third parties working with NWQICSS share responsibility for safeguarding and must uphold this policy at all times.
5. NWQICSS has clear processes to prevent, identify, respond to, and manage incidents of abuse, neglect, exploitation, and harassment.

Purpose

6. The purpose of this policy is to:
 - a. Protect the safety, dignity, and rights of people who interact with or are affected by NWQICSS.
 - b. Define key safeguarding principles and responsibilities within NWQICSS.
 - c. Set out a framework for managing safeguarding risks and incidents.
 - d. Clarify the roles and responsibilities of staff, volunteers, contractors, and third parties.
 - e. Support a positive internal culture of safety, respect, and accountability.
 - f. Ensure compliance with Australian safeguarding, workplace health and safety, and privacy laws.

Definitions

7. ‘Safeguarding’ means protecting the welfare and human rights of people that interact with, or are affected by, NWQICSS, particularly those that might be at risk of abuse, neglect or exploitation. This refers to any responsibility or measure undertaken to protect a person from harm.
8. ‘Abuse, neglect or exploitation’ means all forms of physical and mental abuse, exploitation, coercion or ill-treatment. This might include, for example:
 - a. Sexual harassment, bullying or abuse;
 - b. Sexual criminal offences and serious sexual criminal offences;
 - c. Threats of, or actual violence, verbal, emotional or social abuse;
 - d. Cultural or identity abuse, such as racial, sexual or gender-based discrimination or hate crime;
 - e. Coercion and exploitation;
 - f. Abuse of power.
9. ‘Reasonable grounds to suspect’ is a situation where a person has some information that leads them believe that abuse, neglect or exploitation has taken place, is taking place, or may take place. It comes with a low burden of proof (in fact, no proof is needed at all), but is based on

some information. Questions that may help a person to determine whether they have 'reasonable grounds to suspect' might include:

- a. Could you explain to another person why you suspect something? This helps to make sure that your suspicion is based on information, even if you have no proof.
 - b. Would an objective other person, with the same information as you, come to the same conclusion? This helps to make sure that your suspicion is as objective as possible.
10. A 'survivor-centric approach' means considering and lawfully prioritising the needs, right and wishes of survivors.

Roles and responsibilities

11. While the responsibility to protect people is shared by all who work at or with NWQICSS, some individuals have specific obligations with which they must comply.
12. The members of the board of NWQICSS are responsible for:
- a. Ensuring effective systems and controls are in place to protect people from harm.
 - b. Overseeing compliance with safeguarding laws and standards.
 - c. Promoting a safety-first culture across the organisation.
 - d. Ensuring that NWQICSS takes a survivor-centric approach.
13. The Chief Executive Officer of NWQICSS must:
- a. Ensure NWQICSS has effective and appropriate ways to manage safeguarding and legal compliance;
 - b. Ensure the appointment of a Safeguarding Officer with appropriate skills and competency;
 - c. Ensure that, within the organisation's approach, reasonable steps are taken to protect people;
 - d. Report matters to external authorities, including police, regulators, and funding bodies, where required.
14. The Safeguarding Officer of NWQICSS, must:
- a. Manage reports of abuse, neglect or exploitation;
 - b. Ensure that all staff, contractors, and volunteers are aware of relevant laws, policies and procedures, and NWQICSS Code of Conduct;
 - c. Ensure that all staff, contractors and volunteers are aware of their obligations to report suspected incidents of abuse, neglect or exploitation;
 - d. Manage reports of abuse, neglect or exploitation;
 - e. Provide support for staff, contractors and volunteers in undertaking their responsibilities.
15. All Managers of NWQICSS must:
- a. Promote a positive culture towards safeguarding;
 - b. Implement this policy in their area of responsibility;
 - c. Ensure that the risks of incidents have been considered in their area of responsibility;
 - d. Ensure that there are appropriate controls in place to prevent, detect and respond to incidents;
 - e. Facilitate the reporting of any suspected abuse, neglect or exploitation;

- f. Take a survivor-centric approach to potential incidents and ensure that any incident is dealt with transparently and accountably.
16. All Staff and Volunteers of NWQICSS must:
- a. Familiarise themselves with the relevant laws, the Code of Conduct, policies and procedures for safeguarding;
 - b. Comply with all requirements;
 - c. Report any incident to the appropriate authority when it is reasonable to suspect that a person's safety or welfare is at risk
 - d. Report any suspicion that a person's safety or welfare may be at risk to the appropriate authority; and
 - e. Provide an environment that is supportive of everyone's emotional and physical safety.
17. All partners and contractors of NWQICSS must:
- a. Implement the provisions of this policy and NWQICSS's procedures in their dealings with NWQICSS;
 - b. Report any suspicion that an incident may have taken place, is taking place, or could take place.

Managing safeguarding risk

18. The way NWQICSS manages the risks of safeguarding will be:
- a. Holistic. NWQICSS and its stakeholders will work to prevent, detect and take action on incidents.
 - b. Risk-based and proportionate. NWQICSS will regularly assess the risks to people in its operations and develop proportionate controls to mitigate those risks.
 - c. Survivor-centric. NWQICSS will put survivors at the heart of its approach to safeguarding.
 - d. Lawful. NWQICSS will ensure that it understands and complies with the law in everything it does, in all jurisdictions in which it works.
19. NWQICSS will manage the risk of safeguarding by:
- a. Having up-to-date and documented risk assessments;
 - b. Maintaining a register of NWQICSS's legal obligations for safeguarding and workplace health and safety in all the jurisdictions in which it operates;
 - c. Having an action plan that sets out how it will manage safeguarding;
 - d. Adhering to this Safeguarding Policy and its Code of Conduct;
 - e. Doing due diligence checks of staff, volunteers and third parties;
 - f. Implementing policies, procedures and systems that introduce controls to reduce the likelihood and consequence of incidents;
 - g. Conducting awareness-raising for stakeholders on risks, expectations, and individual responsibilities;
 - h. Maintaining two reporting processes: the confidential reporting process, and the overt reporting process;
 - i. Having an incident response plan;

- j. Monitoring and reviewing the effectiveness and proportionality of its safeguarding approach.

Managing incidents

- 20. Harassment, abuse, neglect and exploitation are all serious misconduct and NWQICSS reserves the right to:
 - a. Take disciplinary action against those it believes are responsible, which may include dismissal;
 - b. Take civil legal action;
 - c. Report the matter to law enforcement.

Reporting suspected incidents

- 21. All staff, volunteers and third parties must, as soon as practicable, report any suspicion that an incident has taken place, may be taking place, or could take place.
- 22. They may do this through direct reporting to:
 - a. Any member of the board;
 - b. The Chief Executive Officer;
 - c. The Safeguarding Officer;
 - d. Their Manager.
- 23. If a person wants to report confidentially, including with anonymity, they may use the confidential reporting system, which is: **safeguarding@nwqicss.org**
- 24. If a person believes that another person is at risk of immediate harm or the victim of a criminal offence, they must dial 000.

Responding to suspected incidents

- 25. All suspected, perceived, potential or actual incidents will be managed through the incident response plan.

External reporting

- 26. NWQICSS will:
 - a. Report any suspicion of a criminal offence to the police or the relevant criminal judicial body;
 - b. Meet all donor requirements regarding the reporting of incidents;
 - c. Report any qualifying matter to the CCC.

Privacy and data protection

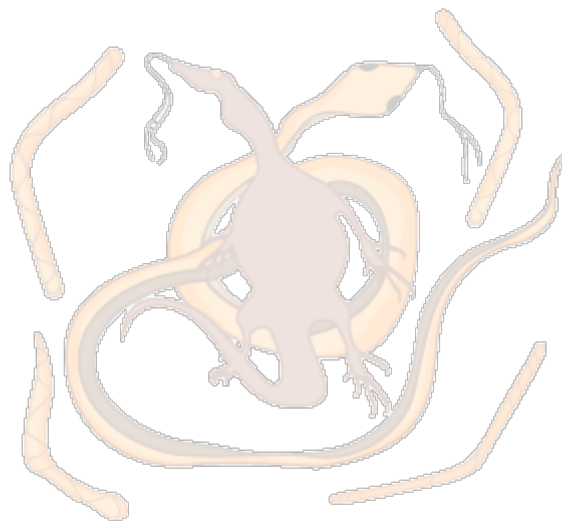
- 27. NWQICSS handles all personal information in line with the Privacy Act 1988 (Cth) and relevant Queensland legislation.
- 28. Information will be shared only when necessary to protect safety meet legal obligations.
- 29. NWQICSS's Privacy Policy applies to all safeguarding-related data.

Administration of this policy

30. This Policy will be reviewed every [two years]. The next review will be on [10/09/2027].

Related policies and procedures

- 31. *NWQICSS Code of Conduct*
- 32. *Privacy Policy*
- 33. *Workplace Health and Safety Policy*
- 34. *Complaints Management*
- 35. *Incident Reporting*
- 36. *Risk Management Policy*



NWQICSS