



Child and vulnerable person safety policy

Australian Peacekeeper and Peacemaker Veterans' Association Ltd
ACN 651 805 702

Adopted on 3 September 2021

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1 Definitions

Term	Definition
Company, our, us, we	means Australian Peacekeeper and Peacemaker Veterans' Association Ltd ACN 651 805 702.
Policy	means this document.
Worker	means an officer bearer, employee, volunteer or contractor.

1 Purpose

- 1.1 The purpose of this policy is to ensure that all Workers engaged by us are aware of our commitment and obligation to creating an organisation safe for children and vulnerable people.
- 1.2 The policy aims to communicate our commitment to child and vulnerable person safety, in a way that can be understood by all, including children, young people and vulnerable people, and it explains key features of our approach to meeting the standards.

2 Scope

- 2.1 This policy applies to all Company Workers.
- 2.2 The policy applies in a broad range of situations where interaction with children, young people and vulnerable people may occur. For example, the Child Safe Policy will apply when Workers come into contact with children, young people and vulnerable people over the phone or in person.
- 2.3 A child or young person is a person under 18 years of age.
- 2.4 A vulnerable person may include an individual aged 18 years and above who is or may be unable to take care of themselves, or is unable to protect themselves against harm or exploitation due to reasons such as age, socio-economic background, education, cultural background, illness, injury, trauma or disability.
- 2.5 It is important that all Workers are aware of their obligations towards children, young people and vulnerable people to ensure the safety of these populations both in the context of their engagement with us and the broader community. It is also important for Workers to exhibit appropriate behaviour at all times because allegations of misconduct involving children, young people and vulnerable people may occur even if the conduct occurred outside of their work.

3 Statement of Commitment

- 3.1 We are committed to the safety, wellbeing and best interests of children, young people and vulnerable people. We:
- (a) will uphold the rights of children, young people and vulnerable people who come into contact with us so that they feel heard on matters relevant to their safety and so that they feel safe and protected;
 - (b) have zero tolerance for child or vulnerable person abuse or neglect and will take all allegations of reportable conduct and safety concerns very seriously, ensuring such conduct is dealt with in accordance with our policies, procedures and any relevant State or Federal law;
 - (c) are committed to preventing child or vulnerable person abuse and neglect and identifying risk early, and removing and reducing these risks;
 - (d) will provide training and education to staff on any Child Safe Standards, Reportable Conduct Scheme and other measures for creating a child safe organisation;
 - (e) will provide a safe environment for, and consider the needs of, children, young people and vulnerable people, including those who have suffered trauma, and consider their needs in providing that environment;
 - (f) will recognise, provide a safe environment for, and consider the needs of, children, young people and vulnerable people across the gender and sexuality spectrums, including those who identify as intersex;
 - (g) will always act in a manner than prioritises the best interests of children, young people and vulnerable people.
- 3.2 This policy provides a broad overview of the measures in place to support the safety of children, young people and vulnerable people across the Company.

4 Police checks and other screening

- 4.1 If a Worker is likely to be interacting with children, young people or vulnerable persons, they may need to undertake and pass one or more of the following checks, depending on the State or Territory in which they are working, volunteering or performing services:
- (a) a Working with Children Check (WWCC); or
 - (b) a Working with Vulnerable Person Check (WWVP check) (in ACT and Tasmania).
- 4.2 WWCC and WWVP checks include consideration of a person's criminal history, criminal charges or allegations, any child protection information, apprehended violence orders or mandatory reporting obligations to determine if a person is suitable to work with children. Checks are not transferable between States and Territories.
- 4.3 Police checks such as a National Police Check are much narrower and generally only provide information about a person's criminal history, which is already included in a WWCC and WWVP check.

- 4.4 Some States and Territories also require other checks or screening processes for people who work with adults and children with disabilities.
- 4.5 The Company may require a Worker to undertake and complete a WWCC, WWVP check or other screening process to the satisfaction of the Company or any legislative or regulatory criteria in order for that Worker to be engaged or continue to be engaged with the Company.
- 4.6 If a Worker is not required to complete a WWCC or WWVP check, the Company may nevertheless require a Worker to undertake and complete a National Police Check to the satisfaction of the Company in order for that Worker to be engaged or continue to be engaged with the Company.
- 4.7 Any Worker must immediately disclose to the Company any matter such as a criminal charge or conviction that a reasonable person would consider to have a negative impact on the Worker's ability and suitability to interact with children, young people or vulnerable people, or as required by any applicable State or Federal legislation.
- 4.8 The Company reserves its right to terminate a Worker's engagement with the Company if the Worker fails to comply with the provisions of this policy.

5 Building a child safe culture

- 5.1 All our Workers have a responsibility to support our commitment and obligation to creating a safe environment for children, young people and vulnerable people.
- 5.2 All our Workers must ensure that at all times they display appropriate standards of behaviour towards children, young people and vulnerable people, by ensuring:
 - (a) their rights are respected;
 - (b) they feel safe and protected;
 - (c) they are not discriminated against;
 - (d) their concerns are listened to and taken seriously; and
 - (e) they are involved in any decisions where possible.
- 5.3 Our Child Safe Code of Conduct outlines appropriate standards of behaviour by adults towards children and young people. It aims to protect children and young people and reduce opportunities for abuse or harm to occur. It also helps Workers by providing them with guidance on how to best support children and young people and how to avoid or better manage difficult situations.

6 Training and supervision

- 6.1 We are committed to ensuring that Workers have access to appropriate professional learning and training opportunities to develop and maintain an understanding of safety and prevention of harm regarding children, young people and vulnerable people. To support Workers, relevant training programs, including our board and management committee induction program, should include appropriate content which outlines our expectations and commitment to safety of children, young people and vulnerable people.
- 6.2 In addition to position specific training requirements, training will be available to Workers who are likely to come into regular contact with children, young people or vulnerable people. This

training will include how to identify, assess and minimise discrimination, risks of abuse or neglect and to detect potential signs of abuse or neglect.

- 6.3 The Company can require a Worker to attend training if it is required for their role.

7 Reporting a child safety concern or complaint

- 7.1 The Company works to ensure all children and young people, their families, and Workers understand their obligations and know who to tell if they observe abuse or neglect, are a victim of abuse or neglect, or if they notice inappropriate behaviour. The Company takes all allegations of child abuse, neglect and reportable conduct seriously. It is committed to ensuring that such allegations are addressed in accordance with our processes for responding to and reporting suspected abuse and neglect.
- 7.2 Child safe issues should be reported to the appropriate manager and to the Child Safety Officer. If a Worker has a reasonable belief that reportable conduct may have occurred, then they must report the incident to the Company's Child Safety Officer. If the incident is a criminal offence, the incident must also be reported to the police on 000.
- 7.3 Reportable conduct in relation to children and young people includes:
- (a) a sexual offence committed against, with or in the presence of, a child, whether or not a criminal proceeding in relation to the offence has been commenced or concluded, or
 - (b) sexual misconduct, committed against, with or in the presence of, a child, or
 - (c) physical violence committed against, with or in the presence of, a child, or
 - (d) any behaviour that causes significant emotional or psychological harm to a child, or
 - (e) significant neglect of a child.

2 Risk Assessment of Persons Prior to Appointment

- 7.4 This risk assessment must be completed prior to a person being appointed as a Responsible Person, member of the Management Committee and advocate. The Company may consider other people whenever it assesses whether a member poses an unacceptable risk of harm to a vulnerable person. The tolerance is low because risk to vulnerable people and children has zero tolerance.
- 7.5 While everyone involved in the Company has a role to play in protecting people, the ultimate responsibility sits with its Responsible Persons, Members of the Management Committee and advocates and for this reason the Vulnerable Person Assessment must consider the following:
- (a) Identify and assess the risks and any legal and ethical obligations.
 - (b) Commit to managing risks of working with vulnerable people.
 - (c) Prevent harm and mitigate risks with clear and comprehensive policies, procedures and systems.
 - (d) Engage people, including those from third parties, to help manage risks by adhering to policies, procedures and systems.

- (e) Detect changes in risks, instances of harm and of non-compliance with obligations.
- (f) Take action when concerns, suspicion or complaints arise.
- (g) Assure the board that risks are being managed.

7.6 The risk assessment process consists of three steps:

- (a) Risk identification;
- (b) Risk analysis; and
- (c) Risk evaluation.

Risk Identification

7.7 The Company will take into account the following during a risk assessment:

- (a) a Police Check,
- (b) the results of a search of the ASIC Disqualified Persons Register for that person,
- (c) the results of a search of the ACNC Register of Disqualified Persons for that person,
- (d) a signed Declaration for Responsible Persons
- (e) any other information the Company considers relevant in determining the applicant's risk.

Risk Analysis

7.8 The intent of the risk analysis process is not to determine whether a person is guilty or innocent. Risk analysis is the process "to comprehend the nature of risk and to determine the level of risk to vulnerable people, children and the Company." The level of risk is influenced by the combination of potential sources of risk, likelihood and their consequences.

7.9 The Company will consider the following characteristics of any relevant offence in the applicant's history:

- (a) the nature, gravity and circumstances of the offence;
- (b) the relevance of the offence;
- (c) how long ago the offence was committed;
- (d) the age of the person and of the victim at the time of the offence;
- (e) whether the person's circumstances have changed since the offence;
- (f) the applicant's attitude to the offence;
- (g) if any treatment or intervention was undertaken, any subsequent assessment of the person;

- (h) if there is an equivalent offence in Australia (for an offence committed overseas);
- (i) number of relevant offences; and
- (j) any submission made by the applicant addressing the above.

This analysis will be applied to the table at Annex A to identify the impact of the risk.

Risk Evaluation

With a zero-tolerance policy the outcome of risk evaluation has two outcomes:

- (a) Acceptable: Where there is no evidence of risk of harm to vulnerable people, applicants.
- (b) Unacceptable. Where there is evidence of risk of harm to vulnerable people, applicants.

The assessment is subjective and, in the end, will be examined by the Board.

8 ACNC Safeguarding Checklist

The Child Safety Officer is responsible to review the ACNC Safeguarding Checklist attached at Annex B and report to the Board and Management Committee at the next respective meetings.

9 The Child Safety Officer

The Child Safety Officer can be contacted by email at mark.horner@peacekeepers.asn.au

Annex: A. Risk Assessment

Risk Analysis – Level of Impact

Characteristic	Consideration	Possible evidence	Impact on risk level
Nature of offence or alleged offence or other information matter	Abuse of power or breach of trust	Statement of facts/Prosecution brief Criminal history check Non-conviction information Regulatory or agency reports	↑
	Pre-meditated or willful action to harm		↑
	Committed against a vulnerable person		↑
	Used force or weapons		↑
	Unlawful deprivation of personal liberty		↑
	No identifiable victim		↔
	Sexual offence		↑
Gravity of offence or alleged offence or other information matter	Penalty imposed: Imprisonment (including suspended) Penalty other than imprisonment Maximum imposed	Criminal history check	↑ ↔ ↑
	Impact on victim or alleged victim	Victim Impact Statement Statement of facts/Prosecution brief	↔
	Pattern of escalating severity/seriousness	Criminal history check	↑
Circumstances of the offence or alleged offence or other information matter	Intoxicated during offence/alleged offence or other information matter: Non-recurring	Submission Statement of facts/Prosecution brief Psychological/Professional reports Police or witness statements Non-conviction information Regulatory or agency reports	↓
	Diminished capacity due to mental state at time of offence/alleged offence or other information matter		↔
	Diminished insight at time of offence/alleged offence or other information matter		↔
Characteristic	Consideration	Possible evidence	Impact on risk level

Impact vs Likelihood

Impact	Likelihood				
	Rare	Unlikely	Possible	Likely	Almost certain
Catastrophic	Moderate	High	High	Critical	Critical
Major	Moderate	Moderate	High	High	Critical
Moderate	Low	Moderate	Moderate	High	High
Minor	Very low	Low	Moderate	Moderate	Moderate
Insignificant	Very low	Very low	Low	Moderate	Moderate

Where there is a very low or low level of risk this is acceptable.

A moderate, high level or critical risk is unacceptable.



Score: 100%
8/8 points

APPVA Safeguarding Assessment

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1. Safeguarding is protecting people at risk of abuse, neglect or exploitation that interact with, or are affected by, your charity.

True

False

1/1 point

2. Only charities that work with vulnerable people need to worry about safeguarding.

True

False

1/1 point

3. Which of the options below could be considered vulnerable people?

Children

People from low socio-economic backgrounds

People from low socio-economic backgrounds

People with impaired intellectual function

People with low literacy levels

People subject to modern slavery

All of the above

1/1 point

4. In a charity, the ultimate responsibility to protect people sits with:

The CEO

Everyone involved with the charity

The charity's Responsible Persons (board or committee members)

The charity's paid staff

1/1 point

5. Which of the following is not one of the seven steps a charity can take to help protect people from harm?

- Identify and assess the risks and any legal and ethical obligations
- Prevent harm and mitigate risks with clear and comprehensive policies and procedures
- Submit a safeguarding policy to the ACNC for approval**
- Take action when concerns, suspicions or complaints arise

1/1 point

6. How should a charity help to reduce the likelihood and consequences of incidents?

- By eliminating every risk that comes with its work
- By over-resourcing to manage risk
- By under-resourcing to avoid risk
- By having internal controls that are proportionate to its work**

1/1 point

7. A charity should have a safeguarding policy and response plan.

- True**
- False

1/1 point

8. How often should a charity review its policies, procedures and systems for safeguarding?

- At least annually**
- Only after an incident
- Whenever there is a change in Responsible Persons
- Never

1/1 point

Done

Safeguarding checklist



My charity has:

- A documented safeguarding risk assessment (including for specific programs processes or events if necessary).
- A register of its legal obligations for safeguarding and Workplace Health and Safety in all the jurisdictions in which it operates - state, federal and international.
- An action plan that shows how your organisation will manage safeguarding.
- A clear safeguarding policy.
- A code of conduct in which safeguarding has been considered.
- Policies, procedures and systems that introduce controls to reduce the likelihood and consequence of incidents.
- A way for people to provide feedback, raise grievances or report suspected or actual safeguarding incidents - both openly and confidentially.
- Awareness-raising measures to ensure that people in the charity understand the charity's risks, the charity's expectations, and their responsibilities as individuals.
- A positive working culture towards safeguarding.
- An incident response plan.
- A way to monitor and review the effectiveness and proportionality of the safeguarding policies, procedures and systems.

Charity name:

Completed by:

Position:

Date:

Signed: