

## SAFEGUARDING POLICY

### Policy Statement

1. All people, regardless of their age, gender, race, religious beliefs, disability, sexual orientation, or family or social background, have equal rights to protection from abuse, neglect or exploitation.
2. Samaritan's Purse Australia ('SPA') commits to promoting and protecting the welfare and human rights of people that interact with, or are affected by, our work - particularly those that may be at risk of abuse, neglect or exploitation. We believe that protecting the most vulnerable is crucial to the faith we adhere to as Christians, to show the love of Christ to all those with whom we interact. We have no tolerance for abuse, neglect or exploitation. We will take a survivor-centric approach in all that we do.
3. All staff, volunteers, partners and third parties of SPA share responsibility for protecting everyone from abuse, neglect or exploitation. Beyond this, particular people have specific responsibilities, and they will do everything in their power to carry out their duties to safeguard all people.
4. SPA has a process for managing incidents that will be followed when one arises.

### Purpose

5. The purpose of this policy is to:
  - a. Help protect people that interact with, or are affected by, SPA.
  - b. Define the key terms we use when talking about protecting people or safeguarding.
  - c. Set out and develop the way SPA manages safeguarding risks.
  - d. Set out the specific roles and responsibilities of persons working in and with SPA.
  - e. Facilitate the safe management of incidents.
  - f. To support a positive and effective internal culture towards safeguarding.

### Definitions

6. 'Safeguarding' means protecting the welfare and human rights of people that interact with, or are affected by, SPA, 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.
7. '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;

- 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.
8. 'Reasonable grounds to suspect' is a situation where a person has some information that leads them to believe that abuse, neglect or exploitation has taken place, is taking place, or may take place. 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.
9. A 'survivor-centric approach' means considering and lawfully prioritising the needs, right and wishes of survivors.

## Roles and responsibilities

10. While the responsibility to protect people is shared by all who work at or with **SPA**, some individuals have specific obligations.

### Members of the board of SPA:

- a. Ensuring that there are appropriate and effective ways for **SPA** to protect all people that interact with SPA;

### The Executive Director of SPA:

- a. Ensure SPA has effective and appropriate ways to manage legal compliance;
- b. Ensure all department managers are trained with appropriate skills and competency;
- c. Ensure that reasonable steps are taken to protect people, taking a survivor-centric approach;
- d. Ensure that reports to external parties are made where required.

### The HR Department:

- 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 SPA's Code of Conduct;
- c. Manage reports of abuse, neglect or exploitation;

### All Managers of SPA:

- a. Promote a positive culture towards safeguarding;
- b. Implement this policy in their area of responsibility;

- c. Ensure that there are appropriate controls in place to prevent, detect and respond to incidents;
- d. Facilitate the reporting of any suspected abuse, neglect or exploitation;
- e. Take a survivor-centric approach to potential incidents and ensure that any incident is dealt with transparently and accountably.

All Staff and Volunteers of SPA:

- 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 or suspicion when it is reasonable to suspect that a person's safety or welfare is at risk;
- d. Provide an environment that is supportive of everyone's emotional and physical safety.

All partners and contractors of SPA:

- a. Implement the provisions of this policy and SPA's procedures in their dealings with SPA;
- b. Report any suspicion that an incident may have taken place, is taking place, or could take place.

## Managing safeguarding risk

11. The way SPA manages the risks of safeguarding in protecting the most vulnerable, is crucial as Christians, to show the love of Christ to all those with whom we interact:
  - a. Holistic. SPA and its stakeholders will work to prevent, detect and act on incidents.
  - b. Risk-based and proportionate. SPA will regularly assess the risks to people in its operations and develop proportionate controls to mitigate those risks.
  - c. Survivor-centric. SPA will put survivors at the heart of its approach to safeguarding.
  - d. Lawful. SPA will ensure that it understands and complies with the law in everything it does, in all jurisdictions in which it works.
12. SPA will manage the risk of safeguarding by:
  - a. Having an Incident Response Plan that sets out how it will manage safeguarding, including a reporting process;
  - b. Adhering to this Safeguarding Policy and its Code of Conduct;
  - c. Doing due diligence checks of staff, volunteers and third parties before appointments are made;
  - d. Implementing policies, procedures and systems that introduce controls to reduce the likelihood and consequence of incidents;
  - e. When taking volunteers, or contractors on trips to observe or participate in our international projects, we will ensure that no one without a prior police check will be allowed to be left alone with children without the supervision of one of our staff members.
  - f. The scope of this policy also covers the protection of Australian school children who accompany us to visit overseas projects.

- g. Conducting awareness-raising for stakeholders on risks, expectations, and individual responsibilities;
- h. Regular monitoring and reviewing the effectiveness and proportionality of its safeguarding approach.

## Managing incidents

13. Harassment, abuse, neglect and exploitation are all serious misconduct and SPA 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*

14. 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.
15. They may do this through direct reporting to:
- a. Any member of the board;
  - b. The Executive Director;
  - c. The HR Department
  - d. Their Manager or Supervisor.
16. All reporting of incidents will be handled confidentially, including with anonymity if desired. (See attached Abuse Incident Reporting Form)

## Procedure

### *Responding to suspected incidents*

17. All suspected, perceived, potential or actual incidents will be managed through the Incident Response Plan.

### *External reporting*

18. SPA 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.

## Privacy and data protection

19. All personal information considered or recorded will respect the privacy of the individuals involved unless there is a risk to someone's safety. SPA will protect personal information.
20. SPA's Privacy Policy applies.

## Related Policies

Communication Policy

# SAFEGUARDING INCIDENT RESPONSE PLAN

## Purpose

This incident response plan is a mandatory procedure that ensures:

- SPA manages risks to people when there is reasonable suspicion that an incident has taken place, is taking place, or will take place;
- SPA manages the risks that come from its response to an incident;
- SPA takes opportunities to improve its safeguarding approach.

## Scope

This plan applies to:

- All managers, staff and volunteers;
- All operations carried out by third parties that are funded by SPA in part or in full;
- All incidents of suspected abuse, neglect or exploitation.

Failure to follow this plan may be considered a serious disciplinary matter.

## Defining an incident

Samaritan's Purse policy for safeguarding provides the following examples of abuse, neglect or exploitation:

- Sexual harassment, bullying or abuse;
- Sexual criminal offences;
- Threats of, or actual violence, verbal, emotional or social abuse;
- Coercion and exploitation;
- Abuse of power.

For the purposes of this plan, an incident begins when there are reasonable grounds to suspect actual, potential, or perceivable cases of abuse, neglect or exploitation may have occurred, may be occurring, or could occur in connection with SPA or its work.

## Responding to a suspicion of an incident

SPA will follow this workflow for all incidents.

At any time during this process, if there is suspicion of imminent harm to a person, contact the police on 000 (111 in NZ). SPA may refer the incident to the police or relevant criminal judicial authority at any point.

### Step 1: Forming a suspicion

The safeguarding policy defines 'reasonable grounds to suspect' an incident and creates a requirement for managers, staff, volunteers and third parties to report that suspicion.

Failure to report instances, allegations, disclosures or concerns about safeguarding will be viewed as a serious matter that may, depending on the circumstances, result in disciplinary action or dismissal.

### Step 2: Reporting a suspicion

The safeguarding policy creates two means by which someone may report a suspicion:

1. Directly reporting to any member of the Board, the Executive Director, the HR Coordinator, or their Manager or Supervisor.
2. Using SPA's website <https://samaritanspurse.org.au/contact-us/> The person receiving the report of a suspicion must notify the Executive Director, who will be responsible for managing the incident.

Reporting child abuse allegations overseas:

- Child abuse reports should be made to the Country or Regional Director. If this is not possible, reports can be made directly to the Australian based Executive Director.
- A local reporting procedure will guide the process based on whether the allegation constitutes a criminal offence in the country, or whether it is a breach of the SPA code of conduct and will be dealt with as a disciplinary matter.
- The first step will be to gather all the relevant information and address any health and protection needs of the child. The matter may be directly referred to the local police and/or authorities if the allegations are considered to be criminal offences.
- If the incident has occurred outside of the program, the matter will be referred to an external body or agency dealing with child protection matters in the country.

When receiving a report:

- Use active listening, be calm, supportive and reassuring with any potential victim or witness. Concentrate on making the person providing information feel that they are doing the right thing and that you are there to help them.
- Explain what you will do with the information.
- Explain that you are required to pass the information to SPA and that SPA will take the matter seriously.
- Get as much information as possible from the source of the concern, if appropriate in the circumstances.

When receiving a report, do not:

- Make promises to any person, except to say that SPA will take the matter seriously.
- Investigate the matter yourself.
- Disclose the information to people other than those you are required to tell.
- Approach the suspect about the incident, challenge the suspect or share information about the incident with the suspect.
- Make judgements about the validity, credibility or veracity of the information.

### Step 3: Managing SPA's response to a suspicion

Upon being notified of the incident, the Executive Director or Manager will:

- Ensure that all people, especially any survivor, are safe;
- Seek further information to help make decisions;
- Initiate a rule that states the information will only be made available to people who need to know.

If there is suspicion of imminent physical harm, including sexual abuse, notify the police immediately.

The Executive Director will convene an Incident Committee to work with them to resolve the incident. The members of this committee will be:

- Executive Director and Manager

The purpose of the Committee is to provide accountability and guidance to the Executive Director, as well as knowledge and experience across different areas of the charity to help successfully manage an incident.

All incidents require investigation. If a matter has not been referred to the police, then, depending on the nature of the matter, the Incident Committee will be guided by the principles of independence and competence:

- What is the best way to carry out an internal investigation independently and objectively?
- What resources are available, internally or externally, to carry out an investigation to the correct level of competence and fairness?

During the course of this plan, survivors must receive support from SPA. This support must make the survivor feel safe and feel that their needs are being prioritised.

Similarly, any person under suspicion must be treated lawfully and with due regard for their own safety, security and needs.

In both cases this includes providing the person with updates, keeping in mind the need for confidentiality.

#### Step 4: Taking action following a suspicion

The Incident Committee will consider the outcomes following an investigation. Possible outcomes may include:

- No further action
- Disciplinary action
- Seeking criminal prosecution, civil action or referral to law enforcement.

Following every incident, SPA will document the lessons learned with the aim of improving the way it manages incidents. This will take a holistic approach, framed by the following questions:

- How will SPA better deter persons from behaving in this way again?
- How could SPA better detect and manage an incident like this again?

The Incident Committee will be responsible for meeting any obligations to report to an external body.

#### Step 5: Concluding the response to a suspicion

To close an incident, the Executive Director or HR Coordinator must be satisfied that:

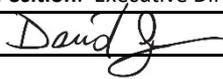
- There are records of the incident that show:
  - How the incident arose and how it was handled
  - The details of the original concern and other relevant information;
  - The details of the decisions that were made
  - The evidence collected
  - The details of the actions taken
  - External reporting of the incident (if required).

- Lessons have been documented and used to improve the way SPA manages incidents in the future.

### Administering this plan

Any information regarding the effectiveness and performance of this plan must be passed to the Executive Director or HR Coordinator.

This plan will be reviewed every two years. The next review will be on 30 April 2024.

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<b>Authorised by</b>	<b>Name:</b> David Ingram	<b>Position:</b> Executive Director
<b>Date</b>	<b>12 May 2022</b>	

## Authorities for each State and Territory across Australia and New Zealand

### ACT

Reporting authority	Further services/information	Contact details
<a href="#">Child and Youth Protection Services</a>	<p><a href="#">Child and Youth Protection Services</a> is responsible for facilitating coordination across government for the care and protection of children and young people in the Australian Capital Territory.</p> <p>If you are concerned about a child and want further information on mandatory reporting, refer to <a href="#">Keeping Children and Young People Safe</a>.</p>	<p><b>Phone:</b> General public Ph: 1300 556 729 (24 hours)</p> <p>Mandated reporters Ph: 1300 556 728 (24 hours)</p> <p><b>Online:</b> For less serious concerns, <a href="#">complete an online child concern report</a>.</p> <p><b>Email:</b> For less serious concerns, <a href="#">contact Child Protection Reports (link sends e-mail)</a>.</p>

### NSW

Reporting authority	Further services/information	Contact details
<a href="#">Department of Family and Community Services</a>	<p>The Department of Family and Community Services is responsible for handling reports of child abuse and neglect in New South Wales. Information about the process of reporting child welfare concerns can be found on the department's <a href="#">Reporting a Child at Risk</a> webpage.</p> <p>For information about mandatory reporting, refer to the <a href="#">Mandatory reporters</a> webpage.</p>	<p><b>Phone:</b> Child Protection Helpline Ph: 13 21 11 (24 hours) (TTY/voice calls: 133 677; Speak &amp; Listen: 1300 555 727; SMS: 0423 677 767) Domestic Violence Hotline 1800 65 64 63</p> <p><b>Online:</b> Mandatory reporters with less serious concerns can use <a href="#">eReporting</a>.</p>

**NT**

Reporting authority	Further services/information	Contact details
<a href="#">Territory Families</a>	In the Northern Territory, every person is required to report suspected child abuse and neglect. Information about the process of reporting concerns about a child's welfare in the Northern Territory, refer to the <a href="#">Report Child Abuse</a> page of the department's website.	<b>Phone:</b> Child Abuse Hotline Ph: 1800 700 250 (24 hours)

**QLD**

Reporting authority	Further services/information	Contact details
<a href="#">Department of Child Safety, Youth and Women</a>	Child Safety is the lead child protection agency in Queensland. For information about the process of reporting concerns about a child's welfare in Queensland, refer to the <a href="#">Protecting Children</a> webpage of the department's website.  For more information about mandatory reporting, refer to the <a href="#">Mandatory Reporting in Queensland</a> webpage.	<b>Phone:</b> For a list of contact numbers during business hours, go to: <a href="#">Regional Intake Services</a> .  Child Safety After Hours Service Centre Ph: 1800 177 135 or (07) 3235 9999.

**SA**

Reporting authority	Further services/information	Contact details
<a href="#">Department for Child Protection</a>	The Department for Child Protection works to keep South Australia's children safe by protecting them from abuse and neglect. For information about the process of reporting concerns about a child's welfare in South Australia, refer to the department's <a href="#">Report Child Abuse</a> webpage.  The Department for Child Protection provides additional information for	<b>Phone:</b> Child Abuse Report Line Ph: 13 14 78 (24 hours)  <b>Online:</b> Less serious concerns can also be <a href="#">reported online</a> .

	mandatory reporting, including <a href="#">Mandated Notifiers and Their Role</a> and <a href="#">Preparing to Report Child Abuse</a> .	
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## TAS

Reporting authority	Further services/information	Contact details
<a href="#">Department of Communities Tasmania</a>	<p>The role of the Child Safety Service is to protect children and young people who are at risk of abuse and neglect in Tasmania. For information about the process of reporting concerns about a child's welfare in Tasmania, refer to the department's <a href="#">Child Safety Service</a> webpage.</p> <p>Information about mandatory reporting and making a notification can be found on the department's <a href="#">Child safety notifications</a> webpage.</p>	<p><b>Phone:</b> Child Safety Service 1800 000 123 (24 hours)</p> <p><b>Online:</b> Mandatory reporters with less serious concerns can <a href="#">report online</a>.</p>

## VIC

Reporting authority	Further services/information	Contact details
<a href="#">Department of Health and Human Services</a>	<p>The Child Protection Service is specifically targeted to those children and young people at risk of significant harm in Victoria.</p> <p>For information about child protection and mandatory reporting requirements in Victoria, refer to the department's <a href="#">Child Protection</a> webpage.</p>	<p><b>Phone:</b> For a list of regional and metropolitan phone numbers: <a href="#">Child Protection Contacts</a></p> <p>After hours child protection emergency service Ph: 13 12 78</p>

## WA

Reporting authority	Further services/information	Contact details
<a href="#">Department of Communities, Child Protection and Family Support</a>	<p>The Department of Communities, Child Protection and Family Support offers a range of services to support children and families in Western Australia.</p> <p>For further information about the process of reporting concerns about a child's welfare, refer to the department's <a href="#">If You are Concerned About a Child</a> webpage.</p> <p>Information about mandatory reporting in Western Australia can be found on the department's <a href="#">mandatory reporting information</a> webpage.</p>	<p><b>Phone:</b> Central Intake Team Ph: 1800 273 889</p> <p>After hours Ph: (08) 9223 1111 or Country Freecall: 1800 199 008</p> <p><b>Online:</b> Mandatory reporters with less serious concerns can use the department's secure <a href="#">Mandatory Reporting Web System</a></p>

## New Zealand

Reporting authority	Further services/information	Contact details
<a href="#">Oranga Tamariki (Ministry for Children)</a>	<p>Oranga Tamariki is responsible for ensuring that children (tamariki) and young people are safe and nurtured in their families and home.</p> <p><b>Our focus</b> is on those who are at significant risk of harm now and into the future as a consequence of their family environment, and/or their own complex needs.</p>	<p><b>Phone:</b> Making a report of concern, <b>freecall:</b> <a href="tel:0508326459">0508 326 459</a></p> <p><b>Online:</b> Mandatory reporters with less serious concerns <a href="mailto:contact@ot.govt.nz">contact@ot.govt.nz</a></p>