

Indigo Junction is committed to promoting and protecting the welfare and human rights of people who interact with, or are affected by, our work - particularly those who may be at risk of abuse, neglect or exploitation.

All Indigo Junction Policies are to be read in conjunction with Indigo Junction's overarching policy commitment statement, the Specialist Homelessness Services (SHS) service standards, the Australian Charities and Not for Profits Commission Governance Standards and the Associations Incorporation Act 2015.

1.0 PURPOSE

The purpose of this policy is to encourage the commitment of all staff to help protect people that interact with, or are affected by, Indigo Junction, and to help support and sustain a positive and effective internal culture of safeguarding.

2.0 POLICY APPLIES TO:

This policy applies to:

- All paid employees
- Board and Committee members
- Volunteers
- Trainees and Apprentices
- Contractors and Sub-Contractors
- Labour-hire employees.

3.0 WHAT I MUST DO

Each staff member shares responsibility for protecting everyone interacting with Indigo Junction from abuse, neglect or exploitation. All Indigo Junction staff are required to be familiar with, and adhere to, this policy and procedure.

Managers must be familiar with this Policy and Procedure and seek assistance where necessary.

Indigo Junction has zero tolerance for abuse, neglect or exploitation.

Indigo Junction will take immediate action utilising a survivor-centric approach to deal with any breaches of this policy which will include taking appropriate disciplinary action and reporting the matter to external authorities as required.

This policy should be read in conjunction with Indigo Junction's **Safeguarding Vulnerable People Procedure** and **GO0006 Safeguarding Children and Young People Policy, Procedure and Code of Conduct**.

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This procedure outlines the processes for managing the safeguarding of vulnerable people of all ages who work in, and with, Indigo Junction.

This procedure will:

- Define key terms we use when talking about safeguarding people.
- Describe the mechanisms Indigo Junction uses to safeguard people.
- Set out the specific roles and responsibilities of persons working in and with Indigo Junction.
- Describe processes to facilitate the safe management of incidents of abuse, neglect or exploitation.

1.0 KEY TERMS

While all people must be protected from harm, there are additional legislative and ethical considerations for protecting vulnerable people.

'Vulnerable people' can include:

- children and seniors
- people with impaired intellectual or physical functioning
- people from a low socio-economic background
- people who are Aboriginal or Torres Strait Islanders
- people who are not native speakers of the local language
- people with low levels of literacy or education
- people subject to modern slavery, which involves human exploitation and control, such as forced labour, debt bondage, human trafficking, and child labour.

Vulnerable people are not limited to organisational beneficiaries or the users of its services. They can include a staff, volunteers, and people in third parties, such as suppliers and partners.

Being able to recognise vulnerability in its various forms is important and is the first step towards being able to protect vulnerable people.

'Safeguarding' means protecting the welfare and human rights of people that interact with, or are affected by, Indigo Junction, 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.

‘Abuse, neglect or exploitation’ means all forms of physical, mental and emotional abuse, exploitation, coercion or ill-treatment. This might include, for example:

- a. Sexual harassment, bullying or abuse*;
*Indigo Junction had specific policies relating to bullying in the workplace, and sexual harassment.
- 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.

‘Reasonable grounds to suspect’ is a situation where a person has some information that leads them believe 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 your suspicion is based on observed behaviours, interactions or 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 your suspicion is as objective as possible.

A ‘survivor-centric approach’ means considering and lawfully prioritising the needs, right and wishes of survivors.

2.0 ROLES AND RESPONSIBILITIES

While the responsibility to protect people is shared by all who work at or with Indigo Junction, some individuals have specific obligations with which they must comply.

The members of the board of Indigo Junction are responsible for:

- a. Protecting all people who interact with, or are affected by, Indigo Junction;
- b. Ensuring there are appropriate and effective mechanisms for Indigo Junction to achieve this;
- c. Ensuring Indigo Junction meets obligations to relevant laws relating to safeguarding;
- d. Ensuring Indigo Junction takes a survivor-centric approach.

The Chief Executive Officer of Indigo Junction must:

- a. Ensure Indigo Junction has effective and appropriate mechanisms to manage safeguarding and legal compliance;
- b. Ensure the appointment of a Safeguarding Manager with appropriate skills and competency;
- c. Ensure that, within Indigo Junction's approach, reasonable steps are taken to protect people;
- d. Ensure reports to external parties are made where required.

The Safeguarding Manager of Indigo Junction must:

- a. Manage reports of abuse, neglect or exploitation;
- b. Ensure all staff, contractors, and volunteers are aware of relevant laws, policies and procedures, and Indigo Junction's Code of Conduct;
- c. Ensure all staff, contractors and volunteers are aware of their obligations to report suspected incidents of abuse, neglect or exploitation;
- d. Provide support for staff, contractors and volunteers in undertaking their responsibilities.

All Managers of Indigo Junction must:

- a. Promote a positive culture towards safeguarding;
- b. Implement this policy and procedure in their area of responsibility;
- c. Ensure the risks of incidents have been considered in their area of responsibility;
- d. Ensure 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 any incident is dealt with transparently and accountably.

All Staff and Volunteers of Indigo Junction must:

- a. Comply with the relevant laws, the Code of Conduct, policies and procedures for safeguarding;
- b. Obtain a National Police Clearance and Working with Children check;
- c. Complete National Principles for Safeguarding Children and Young People Modules on induction and other training as requested;
- d. Report any incident to the appropriate authority when it is reasonable to suspect a person's safety or welfare is at risk;
- e. Report any suspicion a person's safety or welfare may be at risk to the appropriate authority; and
- f. Provide an environment that is supportive of everyone's emotional and physical safety.

All partners and contractors of Indigo Junction must:

- a. Adhere to this policy and Indigo Junction's procedures in their dealings with Indigo Junction;
- b. Report any suspicion an incident may have taken place, is taking place, or could take place promptly.

3.0 MANAGING SAFEGUARDING RISK

Indigo Junction's approach to managing the risks of safeguarding are:

- a. Holistic. Indigo Junction and its stakeholders will work to prevent, detect and take action on incidents.
- b. Risk-based and proportionate. Indigo Junction will regularly assess the risks to people in its operations and develop proportionate controls to mitigate those risks.
- c. Survivor-centric. Indigo Junction will put survivors at the heart of its approach to safeguarding.
- d. Lawful. Indigo Junction will ensure it understands and complies with the law in everything it does, in all jurisdictions in which it works.

Indigo Junction's mechanisms for managing the risk of safeguarding include:

- a. Having up-to-date and documented risk assessments;
- b. Maintaining a register of Indigo Junction'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, Procedure and Code of Conduct;
- e. Completing due diligence checks for 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.

4.0 INCIDENT MANAGEMENT

Harassment, abuse, neglect and exploitation are all serious misconduct and Indigo Junction 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

All staff, volunteers and third parties must, as soon as practicable, report any suspicion an incident has taken place, may be taking place, or could take place.

They may do this through direct reporting to:

- a. Their Manager or Supervisor
- b. The Safeguarding Manager;
- c. The Chief Executive Officer;
- d. Any member of the board;.

If a person wants to report confidentially, including with anonymity, they may use the confidential Indigo Junction Incident Management reporting system or via email to incidentreporting@indigojunction.org.au

If a person believes another person is at risk of immediate harm or the victim of a criminal offence, they must dial 000.

Support for survivors and reporters

Indigo Junction will support access to:

- Counselling or other support requirements (external)
- Employee Assistance Program (EAP)
- Case Management Support

Responding to suspected incidents

All suspected, perceived, potential or actual incidents will be managed through the incident response plan which includes:

1. Immediate risk assessment;
2. Survivor and reporter safety planning;
3. Report externally to relevant authorities and/or regulators (where required);
4. Appropriate records management;
5. Internal investigation;
6. Disciplinary or remedial action;
7. Incident closure.

External reporting

Indigo Junction 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 Australian Charities and Not-for-Profits Commission (ACNC).

Privacy and data protection

All personal information will be handled per the Privacy and Confidentiality Policy (GO0001), unless there is a risk to someone's safety. Confidentiality is maintained except where disclosure is necessary to protect individuals.

Complaints and safeguarding

All safeguarding concerns raised through Indigo Junction's general complaints process will be managed under this policy where relevant. This ensures protection of vulnerable individuals and legal compliance.

Associated Indigo Junction documents:

- GO0001 Privacy and Confidentiality
- GO0002 Risk Management
- GO0007 Diversity, Equality and Inclusion
- GO0008 Code of Conduct
- GO0023 Safeguarding Children and Young People Policy, Procedure and Code of Conduct
- HR1003 Complaints, Grievance and Dispute Policy
- HR1026 Misconduct
- HR1028 Bullying and Harassment Policy and Response Procedure
- OS2016 Abuse and Harassment Procedure
- Commitment Statement of Safeguarding Children and Young People

Policy Context: This policy and procedure relates to:

Applicable standards or other external obligations	ACNC Governance Standard 3 - Compliance with Australian Laws ACNC Governance Standard 5 – Duties of Responsible People SHS Standard 5 – Client Rights and Responsibilities SHS Standard 6 – Privacy and Confidentiality SHS Standard 8 – Complaints Management SHS Standard 9 – Eliminating Barriers SHS Standard 12 – Continuous Improvement and Risk Management SHS Standard 13 – Human Resource Management SHS Standard 14 – Safety and Health National Principles for Child Safe Organisations
Applicable legislation	Family Law Act 1975 (Cwth) Australian Human Rights Commission Act 1986 (Cwth) Community Protection (Offender Reporting) Act 2004 (WA) Working with Children (Criminal Record Checking) Act 2004 (WA) Australian Charities and Not-for-profits Commission Act 2012 (Cwth) Equal Opportunity Act 1984 (WA) Privacy Act 1988 (Cth) Health and Disability Services (Complaints) Act 1995 (WA) Work Health and Safety Act 2020 (WA)
Applicable contractual obligations	

Policy Contact Person: Chief Executive Officer

Approval Signature	
Date of Approval	July 2025

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This document supersedes:

- GO0006 Safeguarding Vulnerable People Policy
- GO0013 Safeguarding Vulnerable People Procedure

Reference: Australian Charities and Not-for-Profits Commission (ACNC) Safeguarding Template Policy
[Governance Toolkit: Safeguarding vulnerable people | ACNC](#) March 2024