Safeguarding Policy

All people, regardless of their age, gender, race, religious beliefs, ability, sexual orientation, or family or social background, have equal rights to protection from abuse, neglect or exploitation.

Common Ground Queensland is committed to promoting and protecting the welfare and human rights of people living in or visiting Common Ground Queensland supportive housing properties – particularly those that might be at risk of abuse, neglect or exploitation.

All staff, volunteers, partners and third parties of Common Ground Queensland share responsibility for protecting everyone from abuse, neglect or exploitation. Common Ground Queensland is committed to implementing the *Safeguarding Policy* and to training our employees, directors, contractors and volunteers in its content and application.

1. Scope

This policy applies to:

* All tenants and visitors of Common Ground Queensland supportive housing properties
* All staff (employees and volunteers[[1]](#footnote-1)), directors, contractors, partners[[2]](#footnote-2) and associates[[3]](#footnote-3) within Common Ground Queensland or engaged by Common Ground Queensland.
1. Definitions

‘Safeguarding’ means protecting the welfare and human rights of people that interact with, or are affected by, Common Ground Queensland, 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.

People who may be particularly at risk can include:

* People who are aged or frail
* People with impaired intellectual or physical functioning
* People from a low socio-economic background
* People who have experienced trauma
* People with poor physical or mental health
* People from an Aboriginal or Torres Strait Islander background
* People from culturally and linguistically diverse backgrounds
* People with low levels of literacy or education.

‘Abuse, neglect or exploitation’ means all forms of physical and mental abuse, exploitation, coercion or ill-treatment. Incidents of harm may include:

* Sexual harassment, bullying or abuse
* Sexual criminal offences and serious sexual offences, such as rape
* Threats of violence or actual violence
* Verbal, emotional or social abuse
* Culture or identity abuse, such as racial, sexual or gender-based discrimination or hate crimes
* Coercion and exploitation
* Abuse of power.

‘Reasonable grounds to suspect’ is a situation where a person has information that leads them to believe that abuse, neglect or exploitation has taken place, is taking place, or may take place. It comes with a low burden of proof but is based on providing some information. Questions that may help a person to determine whether they have ‘reasonable grounds to suspect’ might include:

* 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.
* 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.

1. Code of Conduct

The Common Ground Queensland *Code of Conduct Policy* outlines the organisation’s expectations and requirements in relation to service quality and professional conduct. It provides common understanding of the standard of behaviour and the appropriate boundaries expected of Common Ground Queensland staff, directors and contractors. The *Code of Conduct Policy* is provided to and signed by all Common Ground Queensland staff, directors and contractors.

1. General Principles

Common Ground Queensland and the on-site Support Provider work in partnership to minimise risk through:

* Tenant information, assessment and intake processes
* The appropriate placement of tenants
* Collaborating on risk assessment and management of any perceived potential and/or actual risks
* Addressing any practical safety and security issues
* Proactively engaging with tenants regarding the management of visitors
* Promoting and respecting the right to integrity, privacy, confidentiality and safety.
1. Selection and Screening

Prior to commencing employment or volunteer services, the following precautions will be taken:

* All staff must complete an *Employment Application Form* or *Volunteer/Student Application Form* which requests details of relevant past experience, positions held, details of two referees and permission to contact them.
* All short-listed candidates must undertake a formal interview which includes an analysis of past experience working in a similar environment.
* Reference checks will be undertaken, documented and stored using an agreed set of questions which seek to establish the applicant’s suitability for the role or position.
* A Police check which complies with the legislative requirements of Queensland will be requested and received prior to the employee (excluding tenant employees), volunteer or student commencing their proposed role. The check must show that the individual is not precluded from working in childcare or aged care.

The screening process outlined above for staff will also apply to directors (refer *Board Nomination Form*).

1. Training

All new staff, volunteers and directors will be issued with a copy of this policy and receive formal training in:

* The content and application of the Common Ground Queensland *Safeguarding Policy*
* Reporting procedures and the associated legal requirements.

Refresher training courses based on current “best practice” and changes to legislation will be provided on an annual basis.

1. A Safe Environment

Incidents of abuse are unlikely to take place in front of another person and the presence of a witness can assist in clarifying questionable allegations. For these reasons, working in pairs is the preferred method where possible.

Where possible, interactions should occur in a room which can be observed easily by others. In circumstances where one-on-one support or assistance is provided (i.e., maintenance repair or Concierge response), there must be measures in place to identify if abuse is occurring such as regular rotation of staff, client complaints framework and independent support workers.

1. Reporting Procedure

Common Ground Queensland actively encourages the reporting of all reasonable suspicion of abuse, neglect or exploitation. Reasonable suspicion means fair and practical reason to believe an incident has occurred based on disclosure, hearsay, rumour or observation of behaviour. Common Ground Queensland is committed to building an environment where either a victim or staff member, director, partner or associate feels able to report such abuse.

If a report or disclosure of abuse, neglect or exploitation is made, the person who receives the report/disclosure will maintain appropriate care to the one making the report/disclosure. This will include:

* Treating each allegation seriously and not attempting to deny the allegation or minimise its impact on the alleged victim
* Not pushing the alleged victim to disclose details of the alleged assault or attempt to investigate the allegation
* Assuring the person that they are understood: that their report/disclosure is being taken seriously, that what has happened is not their fault and that they are correct in disclosing the incident
* Not making contact with the alleged perpetrator. If the staff member is already providing assistance to the alleged perpetrator, it may be advisable for another person to assume this responsibility for the duration of any investigation
* If the alleged assault has taken place recently, clothing worn by the person should be, if reasonably practical, retained and handed to the police for forensic examination,
* Maintaining confidentiality, and
* Reporting the allegation to the CEO immediately.

If there is reasonable suspicion that a person living in or visiting Common Ground Queensland supportive housing properties has been or is suffering abuse, neglect or exploitation, the Police, the Common Ground Queensland Board, Common Ground Queensland’s Insurer, the Department of Community Housing and Digital Economy and any relevant contractual authorities will be contacted immediately by the CEO. The same notification protocols will be applied for all disclosed incidents of abuse, neglect or exploitation that have occurred somewhere other than Common Ground Queensland’s premises (e.g., an outing).

An independent person will be appointed by Common Ground Queensland with the specific duty of dealing with any allegations of harm that may arise. The details of those reporting abuse will be kept private and confidential.

A documented reporting process with escalating procedures has been established by Common Ground Queensland for handling allegations of abuse, neglect or exploitation. The escalating procedures will be as follows:

1. The automatic suspension from all work or other duties within Common Ground Queensland of any person while under investigation by Common Ground Queensland or by the police, for committing abuse, neglect or exploitation.
2. The automatic termination of their employment, or involvement with Common Ground Queensland if found guilty of committing abuse, either by internal investigation or by a court.

Any disclosures or reports of suspected abuse, neglect or exploitation and all details of the subsequent investigation will be documented promptly and the documents will be held in a secure location where a breach of privacy cannot occur.

1. Document Retention

All relevant documentation (including employment records, incident and investigation reports, incident-related correspondence and copies of public liability insurance policies) will be securely retained for a minimum of 50 years to ensure documents are available in the event of an allegation of abuse, neglect or exploitation arising.

Procedures that Implement

This policy will be actively implemented by adherence to the following procedures and documents:

* Code of Conduct Policy (Governance System)
* Concierge Manual
* Employee Induction Procedure
* Employee Recruitment Procedure
* Recruitment and Employment Policy/Procedure
* Employee Training and Development Procedure
* Ending a Tenancy Procedure
* General Compliments, Complaints and Appeals Procedure
* Incident Management and Reporting Procedure
* Privacy and Confidentiality Procedure
* Professional Supervision, Support and Development Training Policy/Procedure
* Starting a Tenancy Procedure
* Strengthening New Tenancies Procedure
* Sustaining Tenancies Procedure
* Tenancy Management (Residential) Procedure
* Tenant Compliments, Complaints and Appeals Procedure
* Tenant Transfer Procedure
* Uniform and Dress Code Procedure
* Visitor Procedure

1. Includes students and interns. [↑](#footnote-ref-1)
2. Partners refers to agencies that Common Ground Queensland has an official arrangement with via signed MOU, Partnership Agreement or Contract to implement or deliver Common Ground Queensland programs, projects and initiatives. [↑](#footnote-ref-2)
3. Associates refers to consultants, suppliers, visitors to our programs (including media), advisory group members, supporters and any other individuals or groups that have been brought into contact with children or vulnerable adults (including their personal information and images) while working with and/or supporting Common Ground Queensland. [↑](#footnote-ref-3)