Xavier Children's Support Network

Safeguarding Children and Vulnerable Adults

Implementation and Accountability Strategies

Adapted from the Archdiocesan *Safeguarding Children and Vulnerable Adult Prevention and Protection Policy,* **Implementation and Accountability Strategies, Dated** *19 April 2017*

It takes All of Xavier!!

FOREWORD

It is hard to think of a more basic and important task in the Church that the safeguarding and nurturing of children. My own commitment to that is unequivocal, and I know that the commitment is shared by the many clergy, religious, employees and volunteers of the Archdiocese who work with children in many different ways.

This Safeguarding Children and Vulnerable Adults Policy is an important step in the right direction at a time when we need to change not only policies and procedures in the Church but even our culture which has failed in the past. What you find here replaces our previous policy, and it seeks to prescribe best practice in preventing harm and ensuring that the young and vulnerable are able to flourish. I wholeheartedly commend the policy to you.

The Code of Ethical Behaviour for employees and volunteers who work in service of the Church is an important part of this policy. It makes clear the responsibility to report incidents should abuse of any kind be disclosed at any time. It also leaves no doubt that training for implementation of the policy and regular auditing for compliance are essential. I would ask each of you to accept responsibility on these points.

Many thanks for all you do in service of the Lord Jesus and his Church in the Archdiocese of Brisbane. May the God of all mercy bless you and those entrusted to your care, especially the young and the vulnerable.

Archbishop of Brisbane 17 March 2017

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ACKNOWLEDGEMENTS

This strategy for Xavier Children's Support Network is developed in response to the *Safeguarding Children and Vulnerable Adult Prevention and Protection Policy, **Implementation and Accountability Strategies, Dated** 19 April 2017* provided by the Archdiocese of Brisbane. It is developed to outline the operational strategies that will be implemented by Xavier Children's Support Network to Safe Guard Children and Vulnerable Adults.

Working with Children (Risk Management and Screening) Act 2000 (QLD) requires that businesses, in our case parishes, have a Child and Vulnerable Adults Risk Management strategy.

Nothing in the policy affects the expectations of *Integrity in Ministry – a document of principles and standards for Catholic Clergy & Religious in Australia. (June 2004).*

SCOPE

For consistency throughout the Archdiocese, in the approach to safeguarding children and vulnerable adults, the policy statement applies to Clergy and Archdiocesan workers.   To remove any doubt, Xavier employees are Archdiocesan Workers.

Xavier Children's Support Network (Xavier) will apply their own operational strategies in line with legislative and accreditation requirements that apply to their specific operations.

CORE PRINCIPLES

In the implementation of the policy the Archdiocese of Brisbane is committed to the following principles:

- Children and vulnerable adults have a fundamental right to be respected, nurtured and protected from any harm;
- Recruitment, selection and induction requirements and procedures for all Archdiocesan workers will be designed to ensure unsuitable persons are excluded from appointment;
- All Archdiocesan workers will be required to commit to the Code of Ethical Behaviour which sets out clear expectations regarding behaviour;
- Appropriate education and training will be provided to all Archdiocesan workers to ensure child protection knowledge and skills are current;
- The Archdiocesan Safeguarding Officer will conduct internal monitoring and reporting on an annual cycle, to ensure policy objectives and strategies are being achieved;
- Independent external auditing of the policy objectives and strategies will be undertaken annually and the findings made public, through a report published on the Xavier website and media release.

RISK MANAGEMENT STRATEGY

To ensure that all children, young people and Adults receiving supports from Xavier are free from harm, the following risk management strategy framework is employed.

Note: The below Framework requires revision for the NDIA Screening processes once the DSQ and Yellow Cards are no longer in the legislated system. The current system continues while the transition is underway and all current Yellow Cards expire. In transition existing Yellow Card holders are required to replace Yellow Cards with NDIA Screening Cards

Risk Management Strategy Framework For Child Protection.

Commitment

Policy

Xavier Children's Support Network is committed to the safety and wellbeing of all children and young people who uses its services. Staff will treat children with disabilities and their families with respect and dignity at all times in providing care. To ensure children and young people are kept from harm, the organization has implemented the following policies and procedures:

Safe Environments For Children and Young People

People

Written policies and procedures to ensure consistent practices related to child protection, including:
- Compliance and monitoring of related legislation
- Organizational Risk Management Plan and review
- Recruitment, selection, training, management and supervision of staff
- Appropriate screening of staff
- Blue Card and DSQ Positive Notice Card Register
- Training and proficiencies register
- Complaints register and monitoring
- Incident reporting and management
- RN mandatory reporting
- Risk management plans for high risk activities i.e. Siblings, waterbased

Procedures

Information and training for staff and parents regarding the Risk Management Strategy for Child Protection including:

- Code of Conduct
- Policies and procedures for preventing and responding to harm
- Consequences for breaching the risk management strategy
- Information to families on how to make a complaint
- Rights and expectations of parents and children
- Risk management processes for activities and special events
- Regular policy and procedures review with all staff

Capability

Consistency

STRATEGIES

The policy will be implemented using the strategies outlined below. Accountability will be assessed using the following twelve (12) implementation strategies.

IMPLEMENTATION STRATEGY 1: A STATEMENT OF COMMITMENT

All Clergy, Religious, Archdiocesan workers are bound by the '*Safeguarding Children and Vulnerable Adults Policy'* statement: *The Archdiocese of Brisbane holds that children and vulnerable adults are a gift from God with an intrinsic right to dignity of life, respect and security from physical and emotional harm. They are to be treasured, nurtured and protected from any harm.*	Evidence of compliance with this requirement is demonstrated by: • Display of policy statement in the meeting rooms, hall office; • Publish policy statement on the Xavier Website; • Provide information and resources to children, families and staff via the Xavier website • Provide a copy of the policy statement to all new workers.

IMPLEMENTATION STRATEGY 2: A CODE OF CONDUCT

At induction, all Xavier employees are made aware of and bound by the Xavier Code of Conduct. Prior to commencement, employees and volunteers will have completed the NDIA Code of Conduct - Employees	Evidence of compliance with this requirement is demonstrated by: • Xavier employees have received the Xavier Code of Conduct ; • Employees have signed their understanding of the document; • Records relating to safeguarding training are maintained. • All Xavier staff are required to complete NDIA Code of Conduct training

Employees are recruited according to the Xavier Recruitment and Selection Policy
 	
Within six (6) months of commencement, new employees they must undertake safeguarding training.
 	
Safe recruitment and selection practices are to be implemented to assist in the recruitment and selection of volunteers including:
• A minimum of two (2) Referee checks;
• Interview with Xavier staff including a member of the Management Team;
• Blue Card check (Mandatory);
• Police check (Mandatory from July 2018).
• ==NDIA Screening Card, unless they hold a valid Yellow Card. (In Transition from Yellow Card system to NDIA Card System)==
 	
Key Personnel are made aware of their obligations to report abuse, neglect, exploitation and safeguarding incidents to external bodies including the National Disability Insurance Scheme, Police, Child Safe Authorities.
	Evidence of compliance with this requirement is demonstrated by:
	
	• Inclusion of the safeguarding recruitment statement in any advertising of positions, paid or volunteer, that involves working with children and/or vulnerable adults;
	
	• Xavier Workers adhere to roles as described in church documents: *Integrity in the Service of the Church*;
	
	• Use of specific interview questions designed to screen unsafe candidates;
	
	• Minimum of two reference checks held on Xavier workers' files;
	
	    o Existence of position descriptions for each employee or volunteer;
	
	    o Positive notice Blue Cards to be held by each employee or volunteer working with children;
	
	    o Police Checks are carried out for Xavier workers.
	
	    o Records of training held for employees;
	
	    o Safeguarding training must be completed for ongoing employment to be confirmed before the end of the qualifying period (six months) for employees;
	
	• Training in the mandatory reporting steps is provided to Xavier workers who have contact with children and vulnerable adults; Training to be undertaken every two years;
	
	• Training undertaken for employees in how to Recognise, receive and respond to receive a disclosure of abuse, neglect or exploitation.

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IMPLEMENTATION STRATEGY 4: PROCEDURE FOR HANDLING DISCLOSURES AND SUSPICIONS OF HARM

Xavier workers are required, by the Archdiocesan Safeguarding Children and Vulnerable Adults Policy (see Support Document), to mandatorily report incidents or suspicions of harm. The policy's support document provides the steps in handling suspicion of harm and/or disclosure of harm. Senior staff within Xavier are available to assist with this process, as required.	Evidence of compliance with this requirement is demonstrated by: • Ready access to the Safeguarding Reporting Form to record suspicion or disclosure of harm (hard or soft copy in Xavier office also available on the Xavier Intranet); • Preparing a secure, confidential file within Xavier administrative procedures to retain copies of any Safeguarding Reporting Forms; • Ensure that processes for reporting safeguarding concerns is made known to Xavier families through the Website and the Family Information Pack.

IMPLEMENTATION STRATEGY 5: A PLAN FOR MANAGING BREACHES OF SAFEGUARDING OF CHILDREN AND VULNERABLE ADULTS POLICY

Any breach of this Safeguarding Children and Vulnerable Adults Policy by an Archdiocesan worker is to be addressed in a fair and supportive manner. Concern for justice and healing requires full co-operation with applicable civil authorities and processes [*Integrity in Service of the Church*, p 5]. A **breach** is any action or inaction by anyone associated with Xavier , including children and young people, that fails to comply with any part of *The Safeguarding Children and Vulnerable Adults Policy*. This includes a breach in relation to: • Statement of commitment to the safety and wellbeing of children and vulnerable adults and their protection from harm; • The Xavier Code of Conduct; • Procedures for recruiting, selecting, training and managing Xavier	Evidence of compliance with this requirement is demonstrated by: • Applying natural justice to all persons involved in an alleged breach; • Allowing those involved to provide their understanding of events; • Making detailed notes in regards to the details of the breach and those involved. This may require completing the details on the Safeguarding Recording Form; • Keeping all notes/records in an incident file and/or Archdiocesan employee's file; • Records are kept for a minimum of 50 years in compliance with Xavier Information Management Policy. • Maintaining confidentiality in matters related to the alleged breach; • Ensuring an outcome will be provided within seven days. • Outcomes for breaches will depend upon the nature of the breach, and may include:

workers;

- Policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines;

- Risk assessment and management plans for high risk activities and special events;

- Strategies for communication and support.

- Systems to support oversight of conduct of our workers when dealing with children eg CCTV either in our facilities and / or provided by third parties.

○ Reminder re component of the Safeguarding Policy e.g. Code of Ethics and Conduct;

○ Closer supervision;

○ Further education/training;

○ Mediation between those involved;

○ Review of current policies and procedures and development of new policies and procedures;

○ Reviewing footage of worker conduct when available eg CCTV or provided by families

○ Disciplinary procedures, and report to Professional Standards Office;

○ Notification of misconduct to police, the National Disability Insurance Scheme Quality and Safeguarding Commission, Professional Standards Office and dismissal in the case of proof of harm having been caused;

○ Review of risk assessments

IMPLEMENTATION STRATEGY 6: POLICIES AND PROCEDURES FOR COMPLIANCE WITH SCREENING REQUIREMENTS

A Blue Card Register of Xavier workers is kept. Expiry dates noted, re-applications made and an internal process is in place for tracking renewals.

A Police Check Register of Xavier workers is kept. Expiry dates noted, re-applications made and an internal process is in place for tracking renewals.

A Yellow Card Register of Xavier workers is kept. Expiry dates noted, re-applications made and an internal process is in place for tracking renewals. *(will be superseded as current cards expire)*

A NDIA Screening Card Register is kept. Expiry dates are noted, re-applications made and an internal process is in place for tracking renewals.

Evidence of compliance with this requirement is demonstrated by:

- Employee particulars, including Blue Card, Yellow Card, NDIA Screening Card and APHRA Registrations details entered into the Register and stored in the Aurion system and also kept in an excel register. This system is to be monitored monthly for expiry dates. *(excel Register to be superseded by the Aurion system during 2022).* Xavier workers, volunteers or employees who do not comply with the license requirements will be suspended from activities until compliance is achieved.

- A Police Certificate is also requested of staff each 3 years. This affords additional protections and information for the organisation to risk manage any individual employees police records.

The CEO is accountable to the Board to maintain the Xavier Risk Management System which ensures that risk assessments are conducted on all activities involving children and vulnerable adults. Those involved in the running of these activities understand the risk assessment requirements to mitigate identified hazards.	Evidence of compliance with this requirement is demonstrated by: • Implement the Archdiocesan Two Adult Rule where practicable. Where practical the two-adult rule will be applied for all service shifts. Where two-adult rule is not possible additional message will be risk assessed. For example, CCTV is provided in the Xavier Place facility. Families are made aware of the present of CCTV at Xavier Place. Family who choose to implement CCTV in their homes will not be discouraged, staff will be made aware of this possibility and Xavier will use footage provided for any required investigations. • Follow best practice regarding photography of events involving children and vulnerable people as outlined in the Xavier Privacy Policy; • Follow best practices as outlined by the ACBC Social Networking policy https://www.catholic.org.au/world-communications-day-2015/social- networking-policy; • Risk assessments completed using the Risk Calculator provided in the Xavier Risk Assessment Procedure; • Risk assessments are to be kept within the Work Health and Safety files and reviewed for currency on an annual basis; • Special events, such as children's holiday activity programs should be risk assessed, covering all aspects of the program, including human factors.

IMPLEMENTATION STRATEGY 8: PROFESSIONAL DEVELOPMENT

All Archdiocesan workers working with children and vulnerable adults are required to participate in regular education and training.	Evidence of compliance with this requirement is demonstrated by: • Training records that are maintained.

IMPLEMENTATION STRATEGY 9: COMMUNICATION AND SUPPORT

The Policy, Support Documents and Implementation and Accountability Strategies are communicated publicly.	Evidence of compliance with this requirement is demonstrated by: • *Archdiocesan Safeguarding Policy* is displayed in meeting rooms and on the Xavier website; • Relevant policies are available for viewing on the Xavier website and upon request.

IMPLEMENTATION STRATEGY 10: MONITORING AND REPORTING

The implementation of the policy, strategies and actions are monitored by the Archdiocesan Safeguarding Officer and the CEO of Xavier and annual reports provided outlining the status of that implementation.	Evidence of compliance with this requirement is demonstrated by: • The Archdiocesan website maintains data associated with the implementation of the policy, Implementation strategies and actions; • A program of annual internal audits is undertaken and records kept.

IMPLEMENTATION STRATEGY 11: INDEPENDENT EXTERNAL AUDIT

The implementation of the Policy and all Xavier policies is assessed in part by the audits for Quality as a registered provider of the National Disability Insurance Scheme.	Evidence of compliance with this requirement is demonstrated by: • An independent external audit, including an assessment of screening of worker registration for blue card and yellow card. • The results of the audit are published on the Xavier website.

ASSOCIATED DOCUMENTS

Australian Catholic Bishops Conference and Catholic Religious, *Towards Healing.* Principles and procedures in responding to complaints of abuse against personnel of the Catholic Church in Australia", National Committee for Professional Standards, January 2010.

Australian Catholic Bishops Conference and Catholic Religious, *Integrity in the Service of the Church.* A resource document of principles and standards for lay workers in the Catholic Church in Australia, National Committee for Professional Standards, September 2011.

The following Xavier policies and procedures and documents have relevance to this framework:
Responding to Abuse, Neglect and Exploitation Policy
Prevention of Abuse, Neglect and Exploitation Policy
Mandatory Reporting – Key Personnel
Service Governance & Management
Work Health & Safety
Xavier Information Management Policy
Risk Management Policy and Procedure
Privacy Procedure Policy Addendum
Closed Circuit Television System Policy
Feedback and Complaints Policy
Criminal History Screening Checks – Yellow Card, Blue Card and Police Checks
Code of Ethics and Conduct Policy - Code of Conduct
Corrective Discipline
Staff Training and Development
Whistleblower policy
Xavier Safeguarding Children Resources -
https://www.xavier.org.au/resources/safeguarding_children

LEGISLATION

Child Protection Act (QLD)
Working with Children (Risk Management and Screening) Act 2000
Working with Children (Risk Management and Screening) Regulation 2020
National Disability Standards (worker screening) Regulations 2018
1999 Child Protection Reform Amendment Bill 2014 Education (General Provisions) Act 2006 National Disability Insurance Scheme (Incidents Management and Reportable Incidents) Rules 2018
Privacy Law Public Health Act (Qld) 2005

REFERENCES

Archdiocese of Brisbane Privacy Policy
Archdiocese of Brisbane Catholic Education Council Student Protection Policy September 2011
Carmody Report: Taking Responsibility: A Road Map for Queensland Child Protection (July 2013)
Child Wise http://www.childwise.org.au/Safeguarding Children, Standards and guidance document for the Catholic Church in Ireland. September 2008
South Australian Catholic Church, Child Protection Council Policy for the Care, Wellbeing and Protection of Children and Young People.
Truth Justice and Healing Council, Child Safe Institutions Issues Paper 3