

PAWS Fulfilment Pty Limited ABN 74 143 040 331

T/A Social Engine Australia

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. PAWS Fulfilment 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 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 PAWS Fulfilment share responsibility for protecting everyone from abuse, neglect or exploitation. Beyond this, particular people have specific responsibilities, and they must carry out their duties without exception.
4. **PAWS Fulfilment** has a process for managing incidents that must 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, PAWS Fulfilment.
 - b. Define the key terms we use when talking about protecting people or safeguarding.
 - c. Set out and develop the way PAWS Fulfilment manages safeguarding risks.
 - d. Set out the specific roles and responsibilities of persons working in and with PAWS Fulfilment.
 - 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, PAWS Fulfilment, 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 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.
8. 'Reasonable grounds to suspect' is a situation where a person has some information that leads them believe that 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 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 **PAWS Fulfilment**, some individuals have specific obligations with which they must comply.
11. The members of the board of **PAWS Fulfilment** are responsible for:
- a. Protecting all people that interact with, or are affected by, **PAWS Fulfilment**;
 - b. Ensuring that there are appropriate and effective ways for **PAWS Fulfilment** to do this;
 - c. Ensuring that **PAWS Fulfilment** observes all relevant laws relating to safeguarding;
 - d. Ensuring that **PAWS Fulfilment** takes a survivor-centric approach.
 - e. Ensure **PAWS Fulfilment** has effective and appropriate ways to manage safeguarding and legal compliance;
 - f. (If necessary) Ensure the appointment of a Safeguarding Manager with appropriate skills and competency;
 - g. Ensure that, within the charity's approach, reasonable steps are taken to protect people;
 - h. Ensure that reports to external parties are made where required.
12. All Managers of **PAWS Fulfilment** must:
- a. Promote a positive culture towards safeguarding;
 - b. Implement this policy in their area of responsibility;
 - c. Ensure that the risks of incidents have been considered in their area of responsibility;
 - d. Ensure that 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 that any incident is dealt with transparently and accountably.
13. All Staff and Volunteers of **PAWS Fulfilment** must:
- 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 to the appropriate authority when it is reasonable to suspect that a person's safety or welfare is at risk
- d. Report any suspicion that a person's safety or welfare may be at risk to the appropriate authority; and
- e. Provide an environment that is supportive of everyone's emotional and physical safety.

14. All partners and contractors of **PAWS Fulfilment** must:

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

Managing safeguarding risk

15. The way **PAWS Fulfilment** manages the risks of safeguarding will be:

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

16. **PAWS Fulfilment** will manage the risk of safeguarding by:

- a. Having up-to-date and documented risk assessments with, if necessary, action plans to mitigate unacceptable risks;
- b. Adhering to this Safeguarding Policy and its Code of Conduct;
- c. Doing due diligence checks of staff, volunteers and third parties;
- d. Implementing policies, procedures and systems that introduce controls to reduce the likelihood and consequence of incidents;
- e. Conducting awareness-raising for stakeholders on risks, expectations, and individual responsibilities;
- f. Maintaining two reporting processes: the confidential reporting process, and the overt reporting process;
- g. Having an incident response plan;

Managing incidents

17. Harassment, abuse, neglect and exploitation are all serious misconduct and **PAWS Fulfilment** 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

18. 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.
19. They may do this through direct reporting to:
 - a. Any member of the board;
 - b. Their Manager or Supervisor.
20. If a person wants to report confidentially, including with anonymity, they may use the confidential reporting system, which is: **email to helpdesk@socialengine.org.au**
21. If a person believes that another person is at risk of immediate harm or the victim of a criminal offence, they must dial 000.

Responding to suspected incidents

22. All suspected, perceived, potential or actual incidents will be managed through the incident response plan.

External reporting

23. **PAWS Fulfilment** 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 ACNC.

Privacy and data protection

24. All personal information considered or recorded will respect the privacy of the individuals involved unless there is a risk to someone's safety. PAWS Fulfilment will protect personal information.
25. **PAWS Fulfilment's** Privacy Policy applies.

Administration of this policy

26. This Policy will be reviewed every **[two years]**. The next review will be on **July 2023**.

Procedures created by the policy

27. *N/A*

Related policies and procedures

28. *Onboarding and induction procedures.*