

## CSM AUSTRALIA

### POLICY AND PROCEDURES ON SAFEGUARDING CHILDREN AND VULNERABLE ADULTS

#### 1. Introduction and policy statement

- 1.1 The protection of children and vulnerable adults is important to CSM. The aim of CSM's Policy and Procedures on Safeguarding Children and Vulnerable Adults (**Policy**) is to ensure that children and vulnerable adults with whom CSM comes into contact are properly treated and that there is a system in place to protect their welfare. These policies and procedures have been drawn up on the basis of UK law and guidance, but reflect fundamental principles that apply across all CSM offices.
- 1.1A This policy has been revised and adapted for application in Australia.
- 1.2 CSM believes that:
- a. the welfare of the child is paramount, and that all children regardless of age, disability, gender, race, sexual orientation or identity, or religious belief have the right to equal protection from all types of harm or abuse;
  - b. adults can be deemed to be vulnerable to risk of harm as a consequence of the personal care and support they receive from others, whether because of a particular impairment or illness or for any other reason; and
  - c. safeguarding is everyone's responsibility and everyone who comes into contact with children and vulnerable adults has a role to play.
- 1.3 The purpose of this Policy is:
- a. to facilitate protection for children under the age of 18 years and vulnerable adults, during any activity provided by CSM; and
  - b. to provide staff with procedures to follow in the event that they suspect a child or vulnerable adult may be experiencing abuse or be at risk of abuse or harm, or where there is concern about the behaviour of an adult that might harm a child or vulnerable adult.
- 1.4 Under relevant laws in the United Kingdom, "a child" is anyone up to the age of 18 years, or where the child is receiving help from Social Services or Education, up to the age of 25 years.
- 1.4A In the various Australian jurisdictions (that is, the States and Territories) a "**child**" means a person under the age of 18 years.
- 1.5 There are four recognised categories of child abuse: physical abuse, sexual abuse, neglect and emotional abuse (or maltreatment). Child abuse can include acts of omission (such as neglect) or commission (such as abuse).
- 1.6 The main forms of abuse in relation to a vulnerable adults include: physical abuse, sexual abuse, psychological abuse, financial or material abuse, neglect and acts of omission, and discriminatory abuse.
- 1.6A The majority of Australian jurisdictions do not have a specific definition of a "**vulnerable adult**", with the exception of the Australian Capital Territory which defines a "**vulnerable person**" as an "adult who is experiencing disadvantage and accesses a regulated activity or service in relation to the disadvantage".

- 1.7 Other actions such as bullying also affect children and vulnerable adults. Further descriptions of types of abuse relating to children and vulnerable adults are set out in Appendix 1.
- 1.8 CSM will seek to safeguard children and vulnerable adults by:
- a. valuing them, listening to and respecting them;
  - b. adopting appropriate procedures;
  - c. implementing a **Code of Behaviour** (refer item 3 below) for its staff;
  - d. ensuring appropriate recruitment, selection and vetting of staff;
  - e. providing effective management through supervision, appraisal, support, training and development;
  - f. sharing information about good practice with children, vulnerable adults, parents, staff and the companies and organisations with which we work; and
  - g. sharing information about concerns with the appropriate agencies.
- 1.10 The Policy works in conjunction with other CSM regulations, policies and procedures, in particular CSM's Employee Code of Conduct, and its policies and procedure covering Social Media, Recruitment of Ex-Offenders, Whistle-Blowing and Data Protection.
- 1.11 The Policy is designed to assist all individuals in CSM to meet their duty of care to safeguard all children and vulnerable adults who take part in the activities provided by CSM; and, to ensure that where CSM employees, secondees, casual workers, volunteers, or interns (collectively **CSM Staff**) or visitors have concerns about the welfare of children or vulnerable adults, they are in a position to take appropriate steps to address them.
- 1.12 The Policy will be available on CSM's internal website Bounce and all CSM employees will be made aware of this through induction programmes, training and personal development.
- 1.13 CSM is a global organisation and all CSM Staff must adhere to this Policy. We recognise, however, that there may be international variants in safeguarding children and vulnerable adults, and for purposes of ensuring compliance with local laws, Regional Safeguarding Officers have been appointed in each region outside the UK. When we refer to the Safeguarding Officer in this Policy, it means the Regional Safeguarding Officer for CSM Staff in offices outside the UK.
- 2. Responding to incidents, suspicions and allegations of abuse involving children and vulnerable adults**
- 2.1 The protection of children and vulnerable adults from abuse is paramount. These procedures also recognise the need to protect CSM Staff and third parties from false allegations.
- 2.2 It is not the responsibility of any member of CSM Staff to decide whether a child or vulnerable adult is being abused or might be abused, but there is a responsibility to act on their concerns in order that appropriate agencies can then make enquiries and take any necessary action to protect them.
- 2.3 It is the remit of the appropriate authority and not anyone connected with CSM to investigate the incident.
- 2.4 If an incident, allegation or suspicion of abuse is seen, heard or suspected, the person receiving the information, whether CSM Staff or a member of another organisation with which CSM is working, should follow the procedure below:

- a. Stop other activity and focus on what they are being told or seeing.
  - b. Where an incident is being reported by a child, vulnerable adult or third party:
    - i. react in a calm and considered way but show concern;
    - ii. tell the child, vulnerable adult or third party that it is right for them to share this information;
    - iii. take what the child, vulnerable adult or third party has said seriously and allow extra time if a child or vulnerable adult has a speech difficulty and differences in language;
    - iv. keep questions to an absolute minimum necessary to ascertain a clear and accurate understanding of what has been said but do not interrogate the child, vulnerable adult or third party;
    - v. listen to the child, vulnerable adult or third party and do not interrupt if they are recounting significant events;
    - vi. offer reassurance to the child or vulnerable adult; and
    - vii. do not give assurances of confidentiality but explain you will need to pass on this information to those that need to know.
  - c. Consider whether immediate action is needed to protect any child or vulnerable adult who may be at risk. Think about the child or vulnerable adult who is the immediate concern and any others who may be at risk, in light of what you have been told or seen. Make every effort to contact the Regional Safeguarding Officer, but if s/he is not immediately available you should alert the appropriate authority by reference to the investigating agency register maintained by the Regional Safeguarding Officer and where possible stay with those you think are at immediate risk until they can be transferred to safe care.
- 2.5 The incident must be reported as soon as possible to the Regional Safeguarding Officer for appropriate action to be taken. If the concern relates to the Regional Safeguarding Officer, then it should be reported to the Director, Contracts and Legal.
- 2.6 You should work with the Regional Safeguarding Officer to make a comprehensive record at the earliest possible opportunity of what is said or seen and actions taken. The Incident Report Form set out in Appendix 3 should be completed as part of this record.
- 2.7 Reporting an allegation of child or vulnerable adult abuse is a serious matter and needs to be considered carefully. However, taking no action is not an option in child protection or in responding to concerns regarding a vulnerable adult.
- 2.8 If you believe an incident has not been dealt in accordance with the Policy, it should be reported to the Regional Safeguarding Officer immediately.
- 3. Code of Behaviour**
- 3.1 CSM believes that the Code of Behaviour will assist everyone in protecting children and vulnerable adults and also help with identifying any practices which could be misinterpreted or lead to false allegations. CSM Staff organising any activities on behalf of CSM (including for clients of CSM) involving children or vulnerable adults, must adhere to this Code, which is set out in Appendix 2.
- 3.2 CSM Staff involved in activities with children or vulnerable adults will be briefed as to the expectations in the Code of Behaviour before any such activities take place. These will assist in the event that anyone suspects or is made aware of an incident showing that the Code of Behaviour is

not being adhered to. Such incidences should be reported to the Regional Safeguarding Officer.

- 3.3 Any external suppliers providing services involving work with children or vulnerable adults must be informed of, and confirm adherence to, CSM's Code of Behaviour as part of their contractual arrangement. The Regional Safeguarding Officer must be informed if such personnel are going to be present during activities or training provided by CSM. They must also be required to sign a declaration stating that their staff and volunteers where appropriate will have had the necessary Working With Children Checks (or equivalent), and that the organisation has its own safeguarding policy and procedure.
- 3.4 The Regional Safeguarding Officer should be informed of any CSM activity involving children or vulnerable adults well in advance and provided with full details of the activity. This will include any potential 'visitors' to the site or filming or recording of such activities.

#### **4. Safeguarding Officer**

- 4.1 As an integral part of CSM's structure for dealing with any incidents, the Safeguarding Officer and Regional Safeguarding Officers have been appointed, with overriding responsibility for all safeguarding issues.
- 4.2 The duties, and contact details, of the Safeguarding Officer/Regional Safeguarding Officers are set out in Appendix 4.

#### **5. Recruitment and disclosure and barring**

- 5.1 As part of CSM's commitment to safeguarding we will ensure that appropriate recruitment practices are integrated into our recruitment, vetting, selection and induction processes.
- 5.2 CSM has policies on the recruitment of ex-offenders and the secure storage, use, retention and disposal of disclosures and disclosure information which inform this Policy. These can be found on CSM's internal website Bounce.

#### **6. Training**

The Regional Safeguarding Officer and all CSM Staff who work with children or vulnerable adults will receive an initial briefing as part of their induction and thereafter will be required (as appropriate) to undertake training on a biannual basis in relation to the safeguarding of children and vulnerable adults.

#### **7. Photography and filming of children and/or vulnerable adults**

Where CSM activities involve use of photography and film including children and vulnerable adults, CSM Staff must adhere to the Privacy Policy and should comply with the following guidelines:

- a. All young people and vulnerable adults featured in photographs or recordings must be appropriately dressed for the activity they are undertaking.
- b. Wherever possible, images of the young people and vulnerable adults should be recorded in small groups and focus on the activity.
- c. Parent or guardian consent must be obtained prior to collecting personal information and a copy of CSM's privacy collection statement must be provided at the time consent is obtained.
- d. The storage and dissemination of the photographs or video material must be in accordance with the CSM Privacy Policy.

## **8. Allegations of abuse against CSM Staff**

- 8.1 If a member of CSM Staff or anyone involved in an activity within CSM has a concern about the behaviour of another staff member or adult working within CSM, even as a visitor, they should discuss this with their line manager who must report this to the Regional Safeguarding Officer within the same working day. A decision will be made as to the best course of action.
- 8.2 In the UK, this could include a referral to the police, adult protection services, children's social care and or the Local Authority Designated Officer (LADO). Depending on the outcome, CSM must also consider whether to contact the Disclosure and Barring Service for purposes of addressing the individual's status.
- 8.2A *In Australia, there may be mandatory reporting requirements in the relevant State or Territory. The Regional Safeguarding Officer must determine whether a mandatory report is required (or whether the matter is referred to police or other applicable authorities).*
- 8.3 It is important that all allegations against CSM Staff are taken seriously and are acted upon whether or not the allegation ultimately is determined to constitute abuse.

## **9. Record keeping, using and storing information**

Where an incident has been reported against CSM Staff, all documents relevant to the incident and its outcome will be retained by CSM's Group People and Talent Director to be kept in the personal file of the person concerned.

## **10. Monitoring and Evaluation**

In reviewing the details of any incidents relating to safeguarding children and vulnerable adults, the Regional Safeguarding Officer will keep under consideration the emergence of any obvious patterns or trends, so that these can be identified and dealt with appropriately.

## **11. Review of policy and procedures**

This Policy will be reviewed periodically by the Risk Group and on an ad hoc basis in response to new legislation or where an incident has occurred that requires an adjustment to processes, and to ensure that the Policy continues to meet the safeguarding legislation and best practice.

## APPENDIX 1

### TYPES AND DEFINITIONS OF ABUSE

**Note for Australian adaptation and application of this Policy:** *The following section broadly corresponds to generally understood concepts of abuse in Australian jurisdictions and is included for consistency with CSM's UK/Global policy. Regional Safeguarding Officers should refer to relevant resources of child protection agencies in each State and Territory.*

#### Child Protection

The original UK statutory guidance of “Working Together to Safeguard Children 2010” defined four areas of abuse relating to children. This guidance has been replaced by “Working Together to Safeguard Children 2013” which covers the legislative requirements and expectations on individual services to safeguard and promote the welfare of children. The definitions from the original 2010 guidance are still relevant and are as follows:

**Physical Abuse:** This may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional Abuse:** The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

**Sexual Abuse:** This involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve inappropriate physical contact. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect:** The persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment), protect a child from physical and emotional harm or danger, ensure adequate supervision (including the use of inadequate care-givers), or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

#### Vulnerable Adults

Relevant definitions of abuse relating to vulnerable adults appear in the UK Department of Health publication “No Secrets” (2000) and in the Consultation document “Who Decides?” issued by the Lord

Chancellor's Department (1997).

The starting point is the concept that abuse is a violation of an individual's human and civil rights by any other person or persons. Abuse may consist of a single act or repeated acts. The following main different forms of abuse in relation to a Vulnerable Adult are:

**Physical Abuse:** Including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions;

**Sexual Abuse:** Including rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressured into consenting;

**Psychological Abuse:** Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks;

**Financial or Material Abuse:** Including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits;

**Neglect and Acts of Omission:** Including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating; and

**Discriminatory Abuse:** Including racist, sexist, that based on a person's disability, and other forms of harassment, slurs or similar treatment.

Some instances of abuse will constitute a criminal offence; including assault, (whether physical or psychological) sexual assault and rape, theft, fraud or other forms of financial exploitation, and certain forms of racial or gender-based discrimination. These offences differ from all other non-criminal forms of abuse in that the responsibility for initiating action rests with the police and the Crown Prosecution Service. When complaints about alleged abuse suggest that a criminal offence may have been committed, it is imperative that reference should be made to the police as a matter of urgency.

## **Bullying**

The Anti-Bullying Alliance defines bullying to include deliberately causing hurt (either physically or emotionally) through repetitive actions involving an imbalance of power, where the person on the receiving end feels that they cannot defend themselves.

Bullying can take the following forms:

**Emotional:** Being unfriendly, ignoring someone, not involving them in activities sending hurtful or tormenting texts, humiliating or ridiculing someone;

**Physical:** Pushing, kicking, hitting, punching or pinching or any use of violence;

**Racist:** Racial taunts, graffiti or gestures;

**Disability-based:** Bullying because of how somebody looks or presents related to their disabilities. Children with disabilities are more likely than their non-disabled peers to be excluded from activities;

**Sexual:** Unwanted physical contact or sexually abusive comments. Sexual bullying can also relate to gender and gender identity and includes those who do not fit within the gender role prescribed to them;

**Homophobic:** Because of, or focusing, on the issue of a young person's actual or perceived sexual orientation; and

**Verbal:** Name calling, sarcasm, spreading rumours or teasing; in the case of children with disabilities this can take place in sign language.

## **APPENDIX 2**

### **CODE OF BEHAVIOUR**

All children and vulnerable adults should be treated with respect by CSM Staff.

All activities involving children and vulnerable adults should include a ratio of one adult to every 10 children and one adult to every eight children where the activity involves any travel. Where this is not possible, CSM will ensure that activities take place within the sight or hearing of other adults.

Respect should be given to a child's or vulnerable adult's rights to personal privacy.

In all activities, CSM Staff should be aware that physical contact with a child or young person may be misinterpreted and should be avoided. Where any physical touching is required for purposes of training or instruction, it should be provided openly and consistently in front of others.

In activities, feedback should always be constructive rather than negative and be mindful of the language that you use so as not to be threatening or upsetting.

Private or unobserved contact with a young person or vulnerable adult should be avoided wherever possible unless authorised on the appropriate consent form by a parent or guardian and recorded.

If first aid is required, where possible, it should be administered by a trained first aider in the presence of another adult, and the Regional Safeguarding Officer should be informed.

Written parental or guardian consent should always be obtained for the collection of any personal information and use of any photographs, film or videos involving children and vulnerable adults.

In all activities, CSM Staff are required to challenge unacceptable behaviour in accordance with the provisions of this code of conduct and good practice.

Any incidents, allegations or suspicions of abuse should be reported immediately to the Regional Safeguarding Officer, following the reporting guidelines.

**APPENDIX 3**  
**INCIDENT REPORT FORM**

**Date Incident reported:** \_\_\_\_\_

**Person recording the incident:** \_\_\_\_\_

Person reporting the incident:
Name:
Job role:
Knowledge of and relationship to the child/vulnerable adult:
Contact address:
Telephone numbers(s):
E-mail:

**Child/Vulnerable Adult Details and Incident Details:**

Full name of child/vulnerable adult:
Date of birth:
Contact address:
Telephone numbers(s):
Disability (if applicable):
Location of incident (if relevant):
Date and time of incident (if relevant):
Detailed description (where applicable in child/vulnerable adult's own words):
Details of any observations made by you or to you (e.g. description of visible bruising, other injuries, child/vulnerable adults emotional state). NB: Make a clear distinction between what is fact and hearsay:

Actions taken so far:

**Alleged abuser's details (if known):**

Name:
Date of birth/age:
Relationship with child/vulnerable adult:
Occupation:
Address:
Telephone numbers(s):
Disability:

**External agencies contacted by you or by child/vulnerable adult:**

AGENCY	YES / NO	CONTACT NAME	CONTACT NUMBER	DATE	TIME	DETAILS OF ADVICE RECEIVED.
Police						
State/territory child protection agency <i>(please name)</i>						
Other <i>(please name)</i>						

I acknowledge that the details described are accurate and will remain strictly confidential between the appropriate reporting channels and myself.

Signed \_\_\_\_\_ Date \_\_\_\_\_

## APPENDIX 4

### SAFEGUARDING OFFICERS

#### **Duties of the Safeguarding Officer/Regional Safeguarding Officers**

To be accountable for CSM's safeguarding practices.

To ensure safeguarding is afforded priority at the most senior level within CSM.

To ensure that CSM has a structure in place to fulfil its safeguarding responsibilities, including procedures for dealing with incidents, allegations or suspicions of abuse against CSM staff.

To ensure funding and resources are available to fulfil safeguarding responsibilities.

To ensure monitoring and review systems are in place to respond to new guidance and legislation and to test existing systems.

To ensure all CSM Staff are trained appropriately according to their roles and to ensure appropriate records of that training is maintained.

To refer incidents, allegations or suspicions of abuse to relevant investigating agencies.

To maintain a register of relevant investigating agency contacts in each State and Territory in Australia.

To securely keep detailed and accurate records of any incidents, allegations or suspicions of abuse.

To report any incidents, allegations or suspicions of abuse in an anonymous form to the Risk Group.

To undertake annual training to keep up to date to the most relevant safeguarding procedures for dealing with children and vulnerable adults.

To ensure that CSM Staff assisting in the CSM activity are suitable to work with children or vulnerable adults and that they have had the necessary Working With Children Checks done in conjunction with CSM's People and Talent team and/or the recruiting manager which have been followed up and checked via the appropriate agencies and records kept securely in the CSM People and Talent team.

#### **Contact Details for CSM Safeguarding Officer**

Rob Smith  
Safeguarding Officer  
CSM

E [rob.smith@csm.com](mailto:rob.smith@csm.com)

M +61 411 39 39 38

## **PROCEDURE FOR STAFF AND VOLUNTEERS THAT WORK WITH CHILDREN**

Procedure for staff and volunteers that work with children in summary what happens is:

- All staff and volunteers are provided with all documentation/policies relating to the CSM's expectations and guidelines around the safeguarding of children;
- All staff and volunteers are specifically advised to be familiar with the code of behavior;
- All staff and volunteers undertake DBS checked where appropriate; and
- All staff will undertake safeguarding training where appropriate.