



## 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. Cittamani Hospice Service 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 will take a survivor-centric approach in all that we do.
3. All staff, volunteers, partners and third parties of Cittamani 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. Cittamani has a process for managing incidents or complaints 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, Cittamani Hospice Service.
  - b. Define the key terms we use when talking about protecting people or safeguarding.
  - c. Set out and develop the way Cittamani manages safeguarding risks.
  - d. Set out the specific roles and responsibilities of persons working at and with Cittamani.
  - 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, Cittamani Hospice Service, 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.
  - 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 Cittamani, some individuals have specific obligations with which they must comply.
11. The members of the board of Cittamani Hospice Service are responsible for:
- a. Protecting all people that interact with or are affected by Cittamani.
  - b. Ensuring that there are appropriate and effective ways for Cittamani to do this.
  - c. Ensuring that Cittamani observes all relevant laws relating to safeguarding.
  - d. Ensuring that Cittamani takes a survivor-centric approach.
12. The Executive Director of Cittamani must:
- a. Ensure Cittamani has effective and appropriate ways to manage safeguarding and legal compliance.
  - b. Ensure the appointment of Designated Safeguarding Leaders with appropriate skills and competency.
  - c. Ensure that, within the charity's approach, reasonable steps are taken to protect people.
  - d. Ensure that reports to external parties are made where required.
  - e. Ensure that FPMT is notified where appropriate as per Doc #0650 Safeguarding – FPMT Reporting.
13. Cittamani's Designated Safeguarding Team, will include:
- The Board Chair
  - The Executive Director
  - The Manager, Nursing Services
  - The Manager Social Work Services

They will:

- a. Be the contact persons for reporting abuse, neglect, or exploitation.
- b. Manage reports of abuse, neglect, or exploitation.
- c. Ensure that all staff, contractors, and volunteers are aware of relevant laws, policies and procedures, and Cittamani's Code of Conduct.
- d. Ensure that all staff, contractors, and volunteers are aware of their obligations to report suspected incidents of abuse, neglect, or exploitation.
- e. Provide support for staff, contractors, and volunteers in undertaking their responsibilities.
- f. Ensure that the anyone involved with Cittamani is aware of the members of the Designated Safeguarding Team and how to contact them as well as how to access this policy.

14. All Managers of Cittamani 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.

15. All Staff and Volunteers of Cittamani 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 a member of the safeguarding team 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 a member of the safeguarding team.
- e. Provide an environment that is supportive of everyone's emotional and physical safety.

## **Managing safeguarding risk**

16. The way Cittamani Hospice Service manages the risks of safeguarding will be:

- a. Holistic. Cittamani and its stakeholders will work to prevent, detect, and act on incidents.
- b. Risk-based and proportionate. Cittamani will regularly assess the risks to people in its operations and develop proportionate controls to mitigate those risks.
- c. Survivor-centric. Cittamani will put survivors at the heart of its approach to safeguarding.

- d. Lawful. Cittamani will ensure that it understands and complies with the law in everything it does, in all jurisdictions in which it works.
17. Cittamani Hospice Service will manage safeguarding effectively by:
- a. Having up-to-date and documented risk assessments.
  - b. Having an action plan that sets out how it will manage safeguarding.
  - c. Adhering to this Safeguarding Policy and Cittamani's Code of Conduct.
  - d. Doing due diligence checks of staff, volunteers and third parties.
  - e. Implementing policies, procedures and systems that introduce controls to reduce the likelihood and consequence of incidents.
  - f. Conducting awareness-raising for stakeholders on risks, expectations, and individual responsibilities.
  - g. Maintaining two reporting processes: the confidential reporting process, and the overt reporting process.
  - h. Having an incident response plan.
  - i. Monitoring and reviewing the effectiveness and proportionality of its safeguarding approach.

## **Managing incidents**

18. Harassment, abuse, neglect, and exploitation are all serious misconduct and Cittamani 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 or other appropriate bodies.

### *Reporting suspected incidents*

- d. 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. They may do this through direct reporting to any member of the Designated Safeguarding Team.
19. If a person wants to report confidentially, including with anonymity, they may use the confidential reporting system, which is as follows:
- Staff, volunteers or members of the public can use the form available on Cittamani's website and post to Cittamani.
  - Staff may also report concerns confidentially to one of Cittamani's Employee Assistance Program counsellors.
20. If a person believes that another person is at risk of immediate harm or the victim of a criminal offence, they must dial 000 – Emergency Services.

### *Responding to suspected incidents*

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

### *External reporting*

22. Cittamani will:
  - a. Report any suspicion of a criminal offence to the police or the relevant criminal judicial body.
  - b. Work with statutory agencies as appropriate
  - c. Meet all donor requirements regarding the reporting of incidents.
  - d. Report any qualifying matter to the ACNC.
  - e. Report any qualifying matter to FPMT

### **Privacy and data protection**

23. All personal information considered or recorded will respect the privacy of the individuals involved unless there is a risk to someone's safety. Cittamani will protect personal information.
24. Cittamani's Privacy Policy applies.
25. For issues related to safeguarding and potential risk of harm, please complete the form below. Your comments are confidential and anonymous.



**CITTAMANI HOSPICE SERVICE**  
**SAFEGUARDING POLICY – FORM FOR COMMENT**

*Post to:*

The Director

Cittamani Hospice Service Ltd

PO Box 324

PALMWOODS QLD 4555