



Safeguarding Policy

**World Education Program Australia Ltd
ACN 098 289 297**

Copyright © World Education Program Australia Limited 2024

Unless allowed by the copyright laws that apply to you, you may not reproduce or communicate any content from this publication without obtaining permission from the copyright owner.

1. Our belief

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.

The Board of directors of World Education Program Australia Ltd (**World**) is committed to promoting and protecting the welfare and human rights of people that interact with, or are affected by, its work (wherever those operations might be) – particularly those that may be at risk of abuse, neglect or exploitation. World has no tolerance for abuse, neglect or exploitation and will take a survivor-centric approach in all that World does.

All Representatives of World share responsibility for safeguarding persons, particularly vulnerable persons, from abuse, neglect or exploitation. Beyond this, particular people have specific responsibilities in relation to safeguarding (set out in this policy), and they must carry out these duties without exception.

2. Purpose

The purposes of this safeguarding policy (the **Policy**) are to:

- (a) help protect people that interact with, or are affected by, World;
- (b) define the key terms World uses when talking about protecting people or safeguarding;
- (c) set out and develop the way World manages safeguarding risks;
- (d) set out the specific roles and responsibilities of persons working in and with World;
- (e) facilitate the safe management of incidents; and
- (f) support a positive and effective internal culture towards safeguarding.

This Policy supplements and must be read in conjunction with World's Child Safe Policy. This Policy is intended to set out in a clear and accessible manner World's policy on safeguarding with practical steps to ensure compliance.

A further purpose of this Policy is to assist with World's compliance with the ACNC External Conduct Standards. As a registered charity with overseas operations, World is required under Standard 4 of the ACNC External Conduct Standards it to operate in a manner that minimises risk to vulnerable persons.

3. Definitions

safeguarding means protecting the human rights of people that interact with, or are affected by, World, particularly those that might be at risk of abuse, neglect or exploitation (such as vulnerable persons). This refers to any responsibility or measure undertaken to protect a person from harm.

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, including 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; or
- (f) abuse of power.

incident means a situation where abuse, neglect or exploitation of a person (particularly a vulnerable person) has occurred or there are reasonable grounds to suspect that such abuse, neglect or exploitation of a person (particularly a vulnerable person) has occurred.

reasonable grounds to suspect is a situation where a person has some 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 (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; and
- (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.

Representative means an employee, director, volunteer, or independent contractor, wherever located.

A **survivor-centric approach** means considering and lawfully prioritising the needs, right and wishes of survivors.



vulnerable persons means children (being a person under the age of 18) and certain other persons with a physical or intellectual disability, who suffer mental health issues or illness, are experiencing financial difficulty, who have needs for care and support, who are of Aboriginal or Torres Strait Islander background, who suffer social or financial hardship, have difficulty communicating in English or the local language or are otherwise unable to care for or protect themselves.

4. Scope

This Policy applies to all Representatives of World.

5. Roles and responsibilities

While the responsibility to protect people is shared by all who work at or with World, some individuals have specific obligations with which they must comply.

The members of the Board of World have ultimate responsibility for:

- (a) protecting all people that interact with, or are affected by, World;
- (b) ensuring that there are appropriate and effective ways for World to do this;
- (c) ensuring that World observes all relevant laws relating to safeguarding; and
- (d) ensuring that World takes a survivor-centric approach.

The Chief Executive Officer of World must:

- (a) ensure World has effective and appropriate ways to manage safeguarding and legal compliance;
- (b) ensure that reasonable steps are taken to ensure World's partner organisations (in relation to exchange programs):

- 1) are aware of this Policy; and
- 2) represent to World that they will comply with this Policy as if they were a Representative; and
- (c) ensure that reports to external parties are made where required.

All managers of World 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; and
- f. take a survivor-centric approach to potential incidents and ensure that any incident is dealt with transparently and accountably.

All staff and volunteers of World must:

- a. familiarise themselves with the relevant laws, policies and procedures for safeguarding;
- b. comply with all such 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, noting there is a clear requirement for reporting of complaints and concerns to authorities, whether or not the law requires reporting, and to cooperate with law enforcement;
- 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.

6. Managing safeguarding risk

The way World manages the risks of safeguarding will be:

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

World will manage the risk of safeguarding by:



- (a) having up-to-date and documented risk assessments;
 - (b) maintaining a register of World's legal obligations for safeguarding and workplace health and safety in all the jurisdictions in which it operates;
 - (c) having an action plan that sets out how it will manage safeguarding;
 - (d) adhering to this and other relevant policies;
 - (e) doing due diligence checks of staff, volunteers and third parties;
 - (f) implementing policies, procedures and systems that introduce controls to reduce the likelihood and consequence of incidents;
 - (g) conducting awareness-raising for stakeholders on risks, expectations, and individual responsibilities;
 - (h) accepting reports (including anonymous reports) made under this Policy;
 - (i) having and implementing a Safeguarding Incident Response Plan; and
 - (j) monitoring and reviewing the effectiveness and proportionality of its safeguarding approach.
-

7. Managing incidents

World's rights

Harassment, abuse, neglect and exploitation are all serious misconduct and World reserves the right to:

- (a) take disciplinary action against those it believes are responsible, which may include dismissal, ensuring that it adheres to its obligation to comply with all aspects of Australian employment law;
- (b) take civil legal action; and
- (c) report the matter to law enforcement.

Reporting suspected incidents

All Representatives must, as soon as practicable, report any:

- (a) incident that has taken place, may be taking place, or could take place; and
- (b) suspicion that an incident has taken place, may be taking place, or could take place.

A Representative may do this through direct reporting to:



- (a) their manager or supervisor
- (b) the Chief Executive Officer; or
- (c) any member of the Board.

A report can be made anonymously. This can be done by sending an anonymous letter or email, or by making an anonymous phone call, to their manager or supervisor, the Chief Executive Officer of World or any member of the Board.

However, it may be difficult for World to seek further information from the Representative where the report is made anonymously and there is no way for World to contact the Representative.

If a Representative believes that another person is at risk of immediate harm or the victim of a criminal offence, they must contact the authorities (e.g. the police) immediately.

The Board of World must be notified of any material incident under this Policy.

Responding to suspected incidents

All suspected, perceived, potential or actual incidents will be managed through the incident response plan (in line with the ACNC's template plan).

External reporting

World must:

- (a) report any material suspicion of a criminal offence to the police or the relevant criminal judicial body; and
- (b) report any qualifying matter to the ACNC.

8. Privacy and data protection

All personal information considered or recorded will respect the privacy of the individuals involved in accordance with the terms of World's privacy policy which can be viewed at <https://wep.org.au/privacy/>.

9. Availability

World will ensure all Representatives and partner organisations (in relation to exchange programs) have access to this Policy.



10. Review of this Policy

- (a) The Board is responsible for undertaking an annual review of this Policy each calendar year, and after any material incident.
- (b) WEP will record, review and analyse complaints, issues, concerns and safety incidents for the purpose of identifying causes and systemic failures, and to inform continuous improvement. WEP's ***Evaluation Framework: Policies, Guidelines and Programs*** outlines the process by which it will do this.
- (c) This Policy may be amended only by resolution of the Board.
- (d) In accordance with the processes outlined in its ***Engagement Overview***, WEP will share findings and actions taken in response to relevant reviews of its policies, guidelines and programs, including those related to child safety incidents, with students, families/guardians, staff and volunteers.

Contacts

For questions about this Policy, contact Muriel Scheid at murielscheid@wep.org.au.

Approval

Responsible Officer	Compliance Officer, WEP
Approval Body	CEO, WEP
Approval Date	01/08/2024
Next Scheduled Review	01/08/2025