The BUSY Group

Safeguarding Risk Management Framework

Including:

Risk Management Strategy

Safeguarding Children and Vulnerable People Policy

Reporting Procedure

Risk Assessment

CONTENTS

EXECUTIVE SUMMARY

This framework provides the foundations for how The BUSY Group (TBG) manages safeguarding risks within the organisation and outlines the commitment to providing a safe environment across all we do by actively adopting strategies that embed a culture of zero tolerance for harm or abuse of any kind.

Furthermore, it details how TBG identify, minimise and eliminate risks to the safety of children and vulnerable people within the activities of the organisation and its programs. It also provides written processes to demonstrate how TBG complies with current legislation regarding the care and protection of children and vulnerable people.

OUR SAFEGUARDING COMMITMENT

> **Our Safeguarding Commitment**
>
> As an organisation that prioritises the safeguarding of children and all vulnerable people, the BUSY Group is committed to providing a safe environment across all we do by actively adopting strategies that embed a culture of zero tolerance for abuse of any kind.

The Safeguarding Commitment Statement will be displayed on published materials both online and offline, including but not limited to websites, social media and all internal policies and procedures. Safeguarding awareness posters will be placed at physical sites throughout The BUSY Group and at every other reasonable opportunity to publicly demonstrate the organisations commitment to safeguarding.

SAFEGUARDING FRAMEWORK

The key documents outlined within this framework are:

1. Safeguarding Risk Management Strategy
2. Safeguarding Children and Vulnerable People Policy
3. Safeguarding Incident Reporting Procedure

The ten *Child Safe Standards* plus the additional eleventh standard required by the Victorian government and the associated *National Principles for Child Safe Organisations* have been considered and incorporated into the policies and procedures that make up this framework.

TBG's safeguarding management processes are responsive to change due to internal and external environments. This Safeguarding Risk Management Framework including Policy will be reviewed for its currency and effectiveness annually initiated by Group Quality and Compliance, or as the need arises, such as when there is significant change to legislation or the organisation.

INFORMATION ABOUT THIS DOCUMENT

ENDORSEMENT AND REVIEW

Date Approved	July 2025
Approved by	Exec GM – Corporate Services
Responsible Officer	Group Governance and Compliance Manager (Safeguarding Lead)
Review Timeframe	Annually
Last Review Date	July 2024
Next Scheduled Review Date	July 2026

FURTHER DOCUMENT INFORMATION AND RELATIONSHIPS

Related Standards and Legislation	Appendix 1
Related TBG Policies, Documents Registers and Systems	- TBG Risk Appetite and Enterprise Risk Management Framework - Quality, Risk and Safeguarding Committee Terms of Reference - TBG Whistleblower Policy - TBG Privacy Policy - Annual Safeguarding Compliance Checklist - TBG Working with Vulnerable People Risk Assessment - Safeguarding Incident Register - Group Documents Register - Continuous Improvement Register - Feedback and Complaints Register - Strategic and Operational Risk registers - Legislative Register - ELMO Learning Management System *The BUSY Group uses Folio – Governance Risk Compliance system to record risks and registers.*
The BUSY School Policies	TBS Child Protection Policy TBS Child Risk Management Strategy

BUSY Health Procedures	BUSY Health Child Young Person and Vulnerable Adult Reporting Procedure
	BUSY Health Reporting Flowchart – Schools
	BUSY Health Reporting Flowchart – Community

OBJECTIVE/PURPOSE

The purpose of this Safeguarding Risk Management Framework and associated policies/procedures is to:

1. Support and lead a positive and effective culture towards safeguarding.
2. Ensure compliance with safeguarding regulation and legislation.
3. Prescribe and outline how TBG governs and manages safeguarding risks.
4. Inform Management, staff, contractors and volunteers of their obligation to act ethically and to prioritise safeguarding in every decision and action.
5. Inform a thorough understanding of, and provide clear guidance on, how to action safeguarding behaviours, ensuring the protection of all vulnerable people that TBG interact with.
6. Facilitate the prevention of all forms of harm or abuse from occurring within the activities of TBG.
7. Ensure that all parties are aware of their responsibilities for identifying and detecting possible or actual incidents of harm or abuse and for establishing controls and procedures for preventing such.
8. Provide guidance to management, staff, volunteers, contractors and third parties as to the action that should be taken where they suspect or receive a disclosure that any harm or abuse may be occurring within or outside of TBG and provide assurance that all suspected or alleged abuse will be reported and fully investigated.

SCOPE

This document applies to:

1. All people who are connected to, and/or conduct work for, The BUSY Group (TBG) including all of its legal entities (other than those explicitly outlined herein as being excluded), programs and services, whether in a paid or unpaid capacity - including staff, volunteers, Board members, visitors, partners and any other person associated with, representing or working under contract with TBG;
2. All instances and forms of communication and contact with children, young or vulnerable people, which may include onsite and off-site, face-to-face, online, on the phone or in writing;
3. All policy documents, instruments and other safeguarding policies and processes which are focused on preventing, identifying and mitigating risks to vulnerable people;
4. All activities undertaken by TBG which involve, result in or relate to contact with vulnerable people.

Note: *Providers of education and health services have stringent mandatory reporting requirements and specific processes related to safeguarding, therefore the standalone policies for The BUSY School and BUSY Health should be read in conjunction with this framework, links provided in the previous page.*

For clarity, this document applies to the following entities:

The BUSY Group t/a BUSY At Work   On-Q Human Resources t/a BUSY Ability

Skill360 Australia   Squad

Smart Employment Solutions

DEFINITIONS

The following definitions apply to this document:

	DEFINITION
Abuse/Harm	All forms of sexual, physical, psychological or emotional abuse, neglect, exploitation, coercion or ill-treatment or significant detriment to a child or vulnerable person's physical, psychological or emotional wellbeing or emotional development. This might include, for example (but not limited to): • sexual harassment, bullying or abuse/assault; refers to the use of a child or other vulnerable person for sexual gratification by another – usually an adult (or in the case of children, an older or stronger child/adolescent), or, any act which exposes a vulnerable person to, or involves them in, sexual process beyond his or her understanding and/or control; • sexual criminal offences; • physical abuse/assault: refers to non-accidental physical injury; • exposure to physical violence being inflicted upon someone else (i.e. family member); • emotional abuse: refers to inappropriate verbal or symbolic acts that are demeaning or derogatory, toward a child or vulnerable person, or a pattern of behaviour over time that fails to provide a child or other vulnerable person with safety, wellbeing, adequate nurture and emotional availability; • threats of, or actual sexual or physical violence, verbal, emotional or social abuse; • cultural or identity abuse, such as racial, sexual or gender-based discrimination or hate crime; • coercion and exploitation; occurs when a child, young person or other vulnerable person is used for the personal benefit or interest of another person – adult or child/young person; • abuse of power; and • neglect: occurs when a person with 'support' responsibility or a person in authority fails to provide a child or other vulnerable person, with the necessities of life and causes significant harm to the person's wellbeing or social, psychological, educational, and physical development.
Child or young person	TBG will recognise and protect every person under the age of 18 years as a child or young person, although it is noted that State and Territory regulation and legislation may have differing definitions.
Complaint	An expression of dissatisfaction made to, or about, an organisation related to its services, the conduct of its employees or the handling of an earlier complaint.
Continuous Improvement	The ongoing effort of an organisation to improve services, systems, processes or products to maximise benefits for its clients. The process of continuous improvement relies on evidence-based information to support The BUSY Group's success in achieving its goals and outcomes. This also means adapting to changing needs of the community or people using services.
Disclosure or Allegation	When a person tells another person that harm was threatened, has occurred or is suspected to have occurred. This can be verbally, via social media, or in writing.
Grooming	Actions deliberately undertaken with the aim of befriending and establishing an emotional connection with a child, young person or other vulnerable person, to lower their inhibitions in preparation for inappropriate / unlawful sexual activity with the child or vulnerable person.
Families	Including biological family, support givers, recognised carers, cultural family, legal guardians, and others with a protective role to play.
Mandatory Reporters	Mandatory reporting legislation requires individuals specified on a list of occupations to report cases of specified types of known or suspected abuse and neglect against the vulnerable. They are subject to

	Failure to Report and Failure to Protect Legislation, which if contravened can result in criminal and/or civil action. Specific details about reporting obligations for each jurisdiction can be found at: https://aifs.gov.au

In addition, national legislation exists that requires *all adults over 18* to report suspected or actual child *sexual* abuse and to protect children from *sexual* harm. |
| Protected Disclosure | A report of Reportable Conduct made in accordance with this Policy and under The BUSY Group's Whistleblower provisions.

A disclosure made by a person that is deemed to be:

- made with reasonable belief that the information in the allegation is true or likely to be true;
- made in accordance with this policy/procedure; and
- where the person has not themselves engaged in serious misconduct or illegal conduct in relation to the disclosure |
| Reasonable grounds for belief | A situation where a person has information that leads them to believe that abuse, neglect, or exploitation has taken place, is taking place, or may take place.

A reasonable belief is formed if a reasonable person believes that a child or adult:

- is in need of protection;
- has suffered or is likely to suffer significant harm as a result of physical injury; and
- the parents or guardians are unable or unwilling to protect the person. |
| Reportable Conduct | A sexual offence, such as:

- sexual touching or threat of sexual touching of a person without consent;
- a child or vulnerable person grooming offence; or
- sharing, production, dissemination or possession of child sexual exploitation material.

Sexual misconduct, such as:

- descriptions of sexual acts without a legitimate reason to provide the descriptions;
- sexual comments, conversations or communications; or
- comments to a child, young person or vulnerable person that express a desire to act in a sexual manner towards that person or another person.

Ill-treatment of a child, young person or vulnerable person, such as:

- making excessive or degrading demands of a child, young person or vulnerable person;
- a pattern of hostile or degrading comments or behaviour towards a child, young person or vulnerable person; or
- using inappropriate forms of behaviour management towards a child, young person or vulnerable person.

An assault against a child, young person or vulnerable person, such as:

- hitting, striking, kicking, punching or dragging; or
- threatening to physically harm a child, young person or vulnerable person.
- Emotionally degrading, aggressive or demeaning words or actions |
| Safeguarding | Measures put in place to protect the welfare, safety and human rights of children, young people and vulnerable people that are in any way, connected with the services provided by TBG as an organisation. |

Staff	Includes employees, volunteers and contractors, past or present, whether they are doing paid or unpaid work.
Voluntary Reporting	The ability of any member of the community who is not a mandatory reporter to report their reasonable belief that a child, young person or other vulnerable person has suffered, or is at risk of suffering harm.
Vulnerable People	A child, young person or an individual aged 18 years and above who is, or may be, unable to protect themselves against harm or exploitation by reason of age, illness, trauma or disability, or any other reason. While all people must be protected from harm, there are additional legislative, regulatory and ethical considerations for protecting vulnerable people. Vulnerable people can include: • Children, young people, and seniors • people with impaired intellectual or physical functioning • people from a low socio-economic background • people who are Aboriginal or Torres Strait Islanders • people who are not native speakers of the local language • people with low levels of literacy or education • people subject to modern slavery, which involves human exploitation and control, such as forced labour, debt bondage, human trafficking, and child labour. Vulnerability may be either temporary or ongoing. Vulnerable people are not limited to the users of an organisations services. They can include TBG staff, volunteers, and people in third parties, such as partners.
Whistleblower	Anyone who makes or attempts to make a report of reportable conduct under this Policy and *TBG Whistleblower Protection Policy*, and is, or has previously been, an employee, volunteer, contractor, third party, child, young person or vulnerable person connected to TBG; or is a relative or dependent of such persons.

1. SAFEGUARDING RISK MANAGEMENT STRATEGY

This Safeguarding Risk Management Strategy outlines the specific activities undertaken to embed safeguarding into the culture of the organisation and will be integrated in the approach to the management of safeguarding risks, support decision-making and inform organisational outcomes.

The key elements of The BUSY Group's strategy to manage safeguarding, as outlined in this document, encompass:

1. Safeguarding Principles and Standards
2. Safeguarding Risk Appetite
3. Managing Safeguarding Risk
4. Workforce Management & Leadership
5. Governance, Monitoring and Reporting
6. Continuous Improvement

In 2023 The BUSY Group proactively engaged an independent review of safeguarding activities aimed to strengthen related policy and process.

Safeguarding of children and vulnerable people requires a shared responsibility and an organisational wide commitment, with ownership at all levels within the organisation, to support the Board's approved zero appetite for safeguarding risk and compliance the overall governance framework in place to monitor and manage that risk.

Through the ongoing adoption of the recommendations outlined, the TBG Safeguarding Risk Management Framework will continue to evolve and mature, further strengthening the safety and wellbeing of vulnerable people that are serviced by the organisation.

1.1 SAFEGUARDING PRINCIPLES AND STANDARDS

THE NATIONAL PRINCIPLES AND STANDARDS

The *National Principles for Child Safe Organisations* provide the guidance for and underpin the Group's Safeguarding Principles outlined below. They represent the fundamental values and beliefs that are upheld within the organisation, through the attitudes displayed towards safeguarding and the established safeguarding policies and processes.

The adoption and application of these principles gives effect to the *National Child Safe Standards (NCCS)* and the *Victorian Child Safe Standards (VCCS)* promoting the safety of children and vulnerable people within the organisations activities.

The relevant NCCS and or VCCS have been highlighted throughout this strategy and associated policy, to outline the Group's compliance and commitment to these overarching standards.

SAFEGUARDING PRINCIPLES

1. Safeguarding is embedded in organisational leadership, governance and culture.

2. The rights and interests of the vulnerable person are paramount. TBG is committed to promoting and protecting the rights, interests and safety of the vulnerable people with whom it works and/or interacts.

3. Vulnerable people participate in decisions affecting them and are taken seriously and processes to respond to complaints are appropriate for young and vulnerable people.

4. Families and communities are informed and involved. Feedback and involvement from parents and families is respected, supported and encouraged.

5. We as an organisation are committed to promoting the principles of equity, inclusion and diversity and believe that all people, regardless of their age, gender, race, religious beliefs, disability, sexual orientation, or family or social background, have equal rights to protection from harm, abuse, neglect or exploitation.

6. We as an organisation are committed to protecting the welfare and human rights of people that interact with, or are affected by the work we do, particularly those that may be at risk of abuse, neglect or exploitation.

7. Everyone working within and alongside TBG is responsible for the support and protection of the vulnerable people connected to the organisation.

8. TBG documents how the organisation is safe for vulnerable people through the ways in which it implements the national standards and principles, and these processes are regularly reviewed and improved.

9. TBG is committed to co-operating with law enforcement and child protection agencies.

ESTABLISHING A CULTURALLY SAFE ENVIRONMENT FOR INDIGENOUS CHILDREN, YOUTH, AND VULNERABLE PEOPLE

The importance of equity and diversity are recognised within the *National Child Safe Standards and Principle*s. To take this a step further, in July 2022 the Victorian Commission for Children and Young People introduced an additional eleventh Child Safe Standard that specifically acknowledges and emphasises the importance of 'establishing a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal and Torres Strait Islander children and young people are respected and valued'.

The Victorian Government has produced guidance to assist organisations to strengthen their practices in this area and progress towards full compliance with this relatively new standard. TBG is well progressed in establishing a culturally safe environment for Aboriginal and Torres Strait Islander children, young and vulnerable people and is confidently meeting the outcomes and actions outlined by the Commission. Further detail around how these outcomes are being met can be found in the [Safeguarding Children and Vulnerable People Policy](#).

1.2   RISK APPETITE - SAFEGUARDING

The BUSY Group's Risk Appetite Statement outlines the levels of risk-taking that is deemed acceptable by The Board and type of identified risk it is willing to pursue, retain, take, or turn away from in the achievement of business goals and objectives. The BUSY Group applies the following categories to determine its risk appetite by "Risk Class":

Level of Risk Appetite	Description
Zero	No tolerance for accepting risk. Activities that should always be avoided.
Minor	Low level of risk where the likelihood of impact is minimal.
Moderate	A moderate level of risk may be acceptable where the opportunity presents positive outcomes and outweighs the risk. It is important to actively monitor the risk to ensure appropriate controls are in place and to maintain a sustainable approach.
Willing to Consider	Willing to consider all options with a preference for prudent options and an acceptable level of reward. While activities for low risk are actively encouraged, it is important to not adopt an overly risk adverse approach that may result in unnecessary cost and / or lost opportunity.
Seeking Opportunity	Enthusiasm for innovation leading to preference for higher rewards despite greater inherent risk.

Through the Enterprise Risk Management Framework TBG formally establishes and communicates its risk appetite. The Group's appetite for safeguarding risks is zero tolerance to activities that may increase the risk of children, people and vulnerable adults.

Risk Class	Zero	Minor	Moderate	Willing to Consider	Seeking Opportunity
SAFEGUARDING	✓				
Risk Appetite Description	The BUSY Group has zero tolerance to activities which may increase the risk of children, young people and vulnerable adults being subjected to harm or abuse whilst participating in one of TBGs programs or school.				
Risk Tolerance Measure	**Will not tolerate**	• Failure to maintain or implement effective systems, processes and controls which adequately protect children, young people or vulnerable adults engaged with TBG programs and schools • Failure to provide adequate training and awareness across the organisation • Failure to adequately respond to harm, or allegations of harm			

1.3   MANAGING SAFEGUARDING RISK (NCCS 1, 10)

Strategic and operational risk registers have been developed both at Group level and by each entity within the Group and are managed closely by the CEO and/or GM of each line of business/program, with full review at quarterly intervals.

The systematic actions we take to manage risks and help protect vulnerable people from harm are:

- Identify and assess the risks and any legal and ethical obligations.
- Commit to managing the risks associated with working with vulnerable people.
- Prevent harm and mitigate risks with clear and comprehensive policies, procedures, controls and systems.
- Engage people, including those from third parties, to help manage risks by adhering to policies, procedures, and systems.

- Detect and report on changes in risks, instances of harm and of non-compliance with obligations.

Through closely monitoring safeguarding risks, controls and treatment plans, TBG can ensure that safeguarding risks are being managed in accordance with this document and our organisation's Risk Management Framework as set by The Board.

More detail around the specific risk management activities that are conducted on an ongoing basis can be found in the Enterprise Risk Management Framework (summary provided on page 23).

1.4   WORKFORCE MANAGEMENT AND LEADERSHIP (NCCS 1, 5)

TBG acknowledges the significant responsibility it has to ensure that suitable and safe people are engaged to work within the organisation, particularly those working in direct contact with young or vulnerable. Specific processes are undertaken during the recruitment process to identify any areas of concern or red flags. Further detail is outlined in the Policy under 2.2 Managing Staff Selection and Behaviours.

1.5   GOVERNANCE, MONITORING AND REPORTING (NCCS 1, 9, 10)

As part of the changes adopted from the external safeguarding review, a dedicated Safeguarding Lead (SGL) has been appointed to ensure the required skill, responsibility and focus is applied to this critical role.

In addition, responsibility for the regular monitoring and oversight of safeguarding activities has been formally included in the *Terms or Reference* of the internal committee *Quality and Risk Committee*, which will be known as the *Quality, Risk and Safeguarding Committee (QRSC)*. The QRSC, which includes representation from the Executive team and each TBG entity meets quarterly and will receive regular training on all matters relating to safeguarding, with a focus on the risks within the organisation and how to support the Group to further strengthen safeguarding practices.

TBG COMMITTEE STRUCTURE
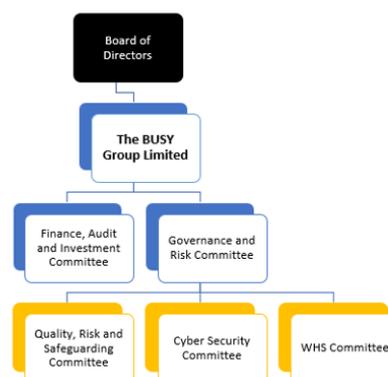
Key

Board Sub Committees

Internal Committees

Safeguarding will be included as a standing agenda item at each meeting of the QRSC, reflecting the priority of and commitment to safeguarding. Through the annual calendar of discussion topics and risk escalation process, the GRC and Group Board has oversight of the risks and associated controls.

Through the established reporting process the Board will satisfy itself and gain confidence that TBG understands and is complying with all required legislation and commitments contained within relevant safeguarding policies and procedures across the Group. Where deemed necessary the Board, via the SGL and the GRC, will periodically seek professional external advice to confirm and ensure it is fulfilling it's legal, ethical and regulatory obligations.

1.6 CONTINUOUS IMPROVEMENT (NCCS 9, 10)

TBG Safeguarding Incident Register records, as well as other systemic process outcomes will inform the *Safeguarding Risk Management Strategy* and its associated risk management processes and program of continuous improvement.

Safeguarding risks, breaches and incidents, as well as feedback and complaints, as recorded in the relevant Registers, are investigated and analysed to identify causes and if there are any systemic issues.

If it is identified that changes to policy, procedure, training, risk assessment or risk register are required, the details are input into the *Continuous Improvement Register (CIR)* to facilitate tracking and accountability and ensure implementation within required timeframes.

2. SAFEGUARDING CHILDREN AND VULNERABLE PEOPLE POLICY

2.1 SAFEGUARDING ROLES AND RESPONSIBILITIES (NCCS 1, 7)

TBG's management processes require that the appropriate stakeholders (external and internal) are consulted and/or informed. Effective communication and reporting will ensure that those responsible for implementing safeguarding practices and controls, as well as other relevant stakeholders, understand the basis on which decisions are made and the reasons why particular actions are required. This process also supports and encourages accountability for ownership of risks and implementing safeguarding practices to mitigate against these risks.

ROLE	RESPONSIBILITY
TBG Board	Accountable for; • ownership and approval of this strategy policy and procedure; • ensuring they and TBG staff operate in compliance with all regulation and legislation relevant to this policy and procedure through robust safeguarding practices, monitoring and reporting, and • leading by example and setting the expectation that safeguarding will be embedded into the vision, purpose, culture, ethics, governance and compliance processes of the organisation.
Quality, Risk and Safeguarding Committee (QRSC)	Members of this Committee support and assist the Safeguarding Lead and are charged with dual responsibility to identify, monitor and control risk, respond to incidents in accordance with this policy, including notifications to the insurer and others as required, and assist in the preparation of detailed reporting to the Board.
Executive Team & Managers	The Executive Team and Managers along with the Safeguarding Lead (SGL) have equal responsibility to comply with all laws, regulations, policy and procedures and to

	lead by example in demonstrating behaviour consistent with setting The BUSY Group's safeguarding culture and compliance. Ensure the processes are readily *accessible* by staff, parents & guardians, staff are *trained* annually in implementing the processes and TBG is *implementing* the processes in accordance with the Safeguarding Risk Management Framework.
Safeguarding Lead (SGL)	Oversees and co-ordinates TBG's safeguarding training, HR practices, compliance, incident response and reporting. Leads the standing safeguarding agenda item within the QRSC and ensures any safeguarding matters are escalated to the Board as required. Ensure TBG staff and parents and guardians of vulnerable people participating in our programs are *aware* of the processes around how TBG responds to harm, or allegations of harm, and the appropriate conduct of TBG staff.
Group Quality and Compliance	Responsible for ensuring TBG its entities and partners as outlined in this Framework, assume responsibility for and implement; • Robust safeguarding policies and procedures, including government requirements for mandatory reporting, reportable conduct schemes, the keeping of thorough Safeguarding Incident Registers, the facilitation of external Compliance Audits and the publication of Annual Compliance Statements as required. • Relevant working with children and vulnerable people checks, ongoing staff training, monitoring and review of safeguarding policies and procedures with a view to continuous improvement.
Staff, volunteers, trainees and contractors	All staff of TBG, involved in paid or unpaid work, are responsible for the protection of the vulnerable people connected with the organisation. In upholding this responsibility, they will undergo training, comply with all policies and procedures, report any suspicion of risk or actual risk, facilitate the reporting by others of risk, and lead by example to demonstrate behaviour consistent with TBG's culture of safeguarding and compliance.
All adults	Safeguarding at TBG is the responsibility of all adults (including families, clients, employers, participants etc). Information relating to safeguarding and the practices adopted within the organisation, key safeguarding personnel and reporting will be made accessible to support adults with this responsibility.

2.2   MANAGING STAFF SELECTION AND BEHAVIOURS

TBG adopts the following procedures for screening, recruiting, training and managing employees to ensure that safe environments for children, young and vulnerable people are maintained.

2.2.1   SCREENING AND RECRUITMENT (NCCS 1, 5)

• All advertisements and position descriptions include TBG's Safeguarding Statement of Commitment and outline the requirement to obtain a Working With Children Check (WWCC) (or state equivalent), to publicly demonstrate that TBG upholds the interests of children, young and vulnerable people and complies with working with children legislative requirements.

- Mandatory questions relating to child safety promotion and disclosure of possible harm will be included in the interview questions for every role.

- TBG manages compliance with state specific working with children legislative requirements by ensuring every candidate is notified at their interview that they are required to undergo pre-employment screening, including a criminal history check and successfully obtain a WWCC (or state equivalent). In addition, they may be required to obtain a Working With Vulnerable People check (WWVP) or Disability Worker Screening if applicable to their role. TBG has a 'no card, no start' policy.

- A register is maintained to ensure currency of WWCC's for all staff at all times with automatic reminders sent to staff when renewal is impending.

- References are contacted and verified for every role prior to appointment (including volunteers) and includes mandatory questions relating to prior history of working with children, young and vulnerable people.

- A probationary period of employment allows TBG to further assess the suitability of new staff and ensure their behaviour is in line with the culture and code of conduct of the organisation.

2.2.2 TRAINING, SUPPORT AND SUPERVISION (NCCS 5, 7,10)

- To assist employees to understand their role in providing a safe environment, training is provided upon induction in relation to; 1. The *National Principles for Child Safe Organisations* and how these are applied throughout the organisation 2.TBG safeguarding policies and procedures, 3. TBG Code of Conduct 4. risks to children and vulnerable people 5. role specific responsibilities, with a particular focus around the expectations regarding reporting obligations.

- Ongoing training is provided via annual formal training, regular informal updates at staff meetings and discussions between managers and their staff to refresh, build confidence and knowledge and keep safeguarding at front of mind.

- Training records are maintained via the Learning Management System (LMS).

- An extensive suite of organisational policies and procedures are accessible on the Hive to outline and guide appropriate behaviours and practices when working with children and vulnerable people.

- Performance management processes are established to assist and support employees to improve their performance in a positive manner, if required.

- Established support processes are in place for employees when they are experiencing challenges, such as mentoring, mediation, conflict resolution, coaching, additional training, and external support and counselling services (EAP).

2.2.3 EDUCATION AND COMMUNICATION (NCCS 2,3,6)

TBG engages, and openly and transparently communicates with families and the community about its approach to safeguarding. Relevant information, including record keeping practices, feedback and complaints processes and access to policies and procedures, is clear and accessible via the website, internal SharePoint site and/or induction materials, as appropriate.

TBG staff will ensure children and vulnerable people are educated about their rights, how to provide feedback or make a complaint and the organisations commitment to safeguarding, through content displayed and provided at sites and program inductions, ensuring it is age appropriate, culturally sensitive and easy to understand.

The TBG Safeguarding Statement of Commitment and Safeguarding posters outlining our promises and who to contact to discuss concerns, are visibly located in each office, to clearly communicate the commitment the organisation has made to foster and uphold the safety of children and vulnerable people.

TBG will provide an interpreter or connect with culturally appropriate support services where required, in order to assist in the understanding of information for families and the community.

2.2.4 ESTABLISHING A CULTURALLY SAFE ENVIRONMENT (NCCS 3,4 & VCCS 1)

Inclusivity is at the heart of who we are and what we do. Across all TBG's entities, services and programs, we pride ourselves in providing a welcoming environment for all our participants, customers and students. TBG respects and understands the local communities in which we deliver our services ensuring employees, volunteers and leaders establish culturally safe environments.

TBG fosters the opportunity to learn and express appreciation of Aboriginal cultures and history through annual recognition activities such as NAIDOC and Reconciliation Action week, Reconciliation Action Plan Committee delivering our second Innovate Reconciliation Action Plan and dedicated First Nations Development Coordinator.

2.2.5 LEADERSHIP AND CULTURE (NCCS 1,2,7)

At TBG, safeguarding vulnerable people is an organisational priority and is embedded within all levels of leadership, to drive the culture of safeguarding throughout the organisation.

A culture of safeguarding is fostered at all levels of the organisation from the Board and Executive Team through to management and staff, by displaying attitudes and behaviours that uphold zero tolerance for harm, respect the human rights of all vulnerable people, and are responsive to the diverse needs of the community.

A safeguarding review, designed to test the adherence to and knowledge of safeguarding processes amongst leadership across the organisation, is conducted on an annual basis. To ensure the review captures an adequate sample across the required entities, a survey is sent to all Leaders and the results are analysed by Group Compliance to determine if there are any areas of concern or non-compliance. A report of the results is provided to The Group Board and informs the child safety declarations made to the Department on an annual basis.

More detail can be found under *Safeguarding Roles and Responsibilities* in the *Safeguarding Children and Vulnerable People Policy* below.

2.3 ASSESSMENT OF ENVIRONMENTS AND ACTIVITIES

2.3.1 ASSESSMENT OF PHYSICAL AND ONLINE ENVIRONMENTS (NCCS 8,10)

Identification, assessment, minimising and elimination of risks to the safety of children and vulnerable people is undertaken on an ongoing basis. TBG utilise various risk management tools to assist it in this process and will keep appropriate records of decisions made and actions taken in relation to risks to children and vulnerable people.

An overarching Safeguarding Risk Assessment is conducted on an annual basis by the WHS Team in consultation with Group Compliance and is reviewed and approved by the Group CEO. It documents the activities/tasks undertaken across the organisation where safeguarding risk exists, current controls that have been implemented to reduce the likelihood and consequence of that risk and any additional controls that could be implemented to further reduce/eliminate the likelihood/consequence of the risk.

TBG provides training to staff and volunteers to help them understand, identify, mitigate and respond to safeguarding risks in varying environments including online, offline, onsite and high-risk offsite.

TBG acknowledges and takes great care to ensure the state and nature of our physical spaces are responsive to identified risks associated with the potential to put vulnerable people at greater risk by isolating them, particularly with visual obstructions. This translates to physical spaces that are designed with this in mind and have features such as breakout spaces and glass doors where possible, to provide required privacy whilst ensuring a level of visibility is maintained.

2.3.2   ASSESSMENT OF HIGH RISK OR OFF-SITE ACTIVITIES (NCCS 5, 8)

For any off-site, late-night or overnight activities that involve children or vulnerable people, a Safeguarding Risk Assessment of people and place must be conducted by a member of the *Quality Risk and Safeguarding Committee,* or other person as delegated by the Committee.

The Safeguarding Risk Assessment will be formally documented, signed by the person conducting it and saved in the Risk Register and will involve at minimum;

1. Confirmation that <u>all people</u> who may come into contact with children and vulnerable people hold the appropriate and current Working with Children/Vulnerable People checks.
2. Assessment of and confirmation that the environment is safe and comfortable for children and vulnerable people.
3. Ensuring that facilities and services procured from third parties are accompanied by contracts that include assurances around safeguarding policies, risk assessment and insurance coverage and that they have procedures in place to ensure the safety of children and vulnerable persons.

Staff and volunteers should not transport children or vulnerable persons to an off-site activity in private vehicles, except in an emergency.

2.3.3   CONTACT WITH VULNERABLE PEOPLE (NCCS 5, 10)

Acceptable and prohibited forms of contact with children and vulnerable people, including in both physical and online environments, are outlined in the safeguarding section of the [TBG Code of Conduct](#) which is read and agreed to by all staff of TBG as part of the induction process.

TBG acknowledges the potential risks associated with harm being perpetrated on vulnerable people by other vulnerable people. Where appropriate to the role, training is provided to staff and volunteers to help them identify unsafe and inappropriate contacts and behaviours, and how to respond.

3.   RESPONDING TO INCIDENTS AND COMPLAINTS

3.1   HANDLING DISCLOSURES   (NCCS 6)

Please refer to the *[Safeguarding Incident Reporting Procedure](#)* for direction in handling disclosures.

Disclosures may be made in in writing, in person or by phone.

Any person can make a report of suspected or likely harm or abuse by:

- Using the Safeguarding Incident Reporting form
- Speaking with their manager who will report up to the Safeguarding Lead
- Phoning or emailing the Safeguarding Lead safeguarding@thebusygroup.com.au
- Contacting the appropriate authority directly, including Police – triple zero.

All staff and volunteers are required to act and to report to the Management in relation to all incidents that come to their attention. They are also required to ensure that the details of the incident are properly and fully recorded in the Safeguarding Incident Register, reported to the SGL and to ensure the privacy, safety and wellbeing of the person/s involved is upheld.

From 5 July 2021 it is an offence for any adult not to report sexual offending against a child by another adult to police. Failure to Report and Failure to Protect carry criminal charges that can be brought against anyone who fails in their duty of care. There are exceptions to this requirement set out in the legislation, but TBG requires all disclosures to be reported to the SGL for their determination.

In the event that mandatory reporting is required, the Australian Government AIFS guidelines will be followed.

If a disclosure of sexual abuse is made by a vulnerable adult **mandatory reporting requirements** do not apply but a report can still be made, unless otherwise explicitly directed not to do so by the adult complainant who experienced the abuse. Obligations to respect the rights to privacy and choice for vulnerable adults override this requirement within this policy to report to authorities (unless legislation or regulation directs otherwise).

When making a disclosure or complaint the child or vulnerable person will be given the opportunity to have their family, carer or advocate present and involved throughout the process for support.

3.2 MANAGING BREACHES (NCCS 10)

TBG is committed to appropriately managing breaches of this Policy in accordance with other relevant policies as appropriate in the circumstances, such as the Feedback and Complaints Procedure and the Whistleblower Report Policy

Staff who are suspected of inappropriate conduct of a sexual nature or have allegations brought against them of sexual abuse, will be subject to:

- Mandatory reporting of the matter to authorities including the police;
- Suspension from work or other duties within TBG while they are under any investigation (internally or by the Police);
- Automatic termination of an employee's, contractor's or volunteer's involvement with TBG if found guilty of committing sexual abuse following an investigation or trial;
- Potential legal action.

TBG acknowledges there may be serious repercussions for individuals who are mentioned in a report. Accordingly, TBG will ensure their fair treatment and extend the protections stated in the above policies to these individuals where appropriate.

The Group CEO & Safeguarding Lead are ultimately responsible for ensuring all incidents, including disclosures, allegations, suspicions, concerns, breaches of Safeguarding Code of Conduct, complaints, near misses and actual harm (collectively referred to as Incidents) are lawfully, efficiently, and thoroughly recorded, responded to and reported to the Board, Insurance provider, funding body and other authorities as required.

3.2.1 ESCALATION PROCESS

If the SGL may somehow be conflicted, be unavailable or lack independence from the circumstances of the suspected, alleged or actual sexual abuse or other harm, the matter must be reported to another member of the Quality, Risk and Safeguarding Committee (QRSC) who will then be required to take full responsibility for dealing with the matter according to this policy and procedure. Details of committee membership can be found on the Group Quality and Compliance page on the Hive.

3.2.2 PRIVACY AND CONFIDENTIALITY

TBG acknowledges that issues regarding child abuse and the reporting of allegations of child abuse are highly sensitive and should be dealt with in a confidential manner. In line with privacy legislation the privacy of individuals involved in any disclosures or incidents will be respected and maintained, including all personal information identified or recorded, with the exception of the use or disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to the public health or safety (Australian Privacy Principle 6).

TBG is committed to upholding the principles and legislative requirements outlined in Federal and State Child Safety Practice Manuals (i.e. Section 159N of the Queensland Child Safety Practice Manual). Where appropriate and lawful, TBG will request or share relevant information with prescribed entities and service providers to support child protection efforts. This includes complying with information-sharing provisions under Federal and State Child Protection Acts, particularly where there is a risk of harm or where collaboration is necessary to provide effective support services.

Staff are required to follow contractual obligations and internal procedures when requesting or disclosing information, ensuring that all actions are documented and consistent with privacy and confidentiality legislative requirements. Further guidance can be found in TBG Privacy Policy.

Staff will respect the privacy and confidentiality of all concerned and not discuss or disclose the details of any allegations to anyone, other than persons to who they are required to report under this policy.

All staff are required to understand the potential personal ramifications of defamation that may arise if confidentiality is not maintained.

3.2.3   FEEDBACK PROCESS (NCCS 6)

Feedback is encouraged by TBG and viewed as an opportunity to improve the safety, support and service provided.

The Group regularly reviews opportunities to gain feedback and participation from young & vulnerable people about decisions that affect them and encourages input via the customer feedback process from all stakeholders such as caregivers or staff, in decisions which affect young and vulnerable people.

Education and effective two-way communication also play an integral part in ensuring young and vulnerable people are aware of their rights and of how to provide feedback or make a complaint.

Vulnerable persons, families, staff and volunteers who raise concerns, complaints or make disclosures will be provided with timely responses from TBG and kept abreast of the actions being taken in response to their complaint and any outcomes.

TBG Feedback and Complaints Procedure can be viewed here

3.2.4   WHISTLEBLOWER PROTECTION

It is important that people working within or associated with TBG, and its services have the confidence to come forward to speak out, if they have any concerns about incidents or any other behaviour that contradicts this policy or the Code of Conduct. Please refer to TBG's Whistleblower Protection Policy for information on how allegations of reportable conduct are received, investigated and addressed.

If a person who has made a report subsequently feels that they have been the subject of any kind of retribution, they are encouraged to notify the SGL who will ensure the matter is investigated.

3.2.5   RECORDING INCIDENTS (NCCS 9)

TBG maintains a Safeguarding Incident Register, which contains a thorough record of all information concerning safeguarding and child protection incidents that have been brought to the attention of any staff member, including the SGL & QRSC.

Details that are recorded in the register include names of all people involved, name of the person making the incident report, dates, timeframes, details of incident, details of TBG's management that were notified, details of any authorities who were notified, actions taken and outcomes.

The SGL, QRSC and Group CEO are required to report incidences to the Board, relevant insurance providers, funding bodies and any other body required by law or under contractual obligations.

Identified improvements will be recorded and tracked in the *Continuous Improvement Register* until implemented, to provide monitoring and oversight by management, the SGL and The Board to ensure desired outcomes are achieved.

4. SAFEGUARDING INCIDENT REPORTING

The purpose of this *Safeguarding Incident Procedure* is to provide clear guidelines on how to respond to, manage and report <u>serious incidents of a safeguarding nature</u> and to understand the legislative, regulatory, policy and procedure requirements involved.

> Report all allegations and disclosures to the Group Safeguarding Lead without delay.
>
> Group Safeguarding Lead: **Elise Nicholas**   ☎:**0438 128 422**   ✐: **safeguarding@thebusygroup.com.au**

All staff must respond to disclosures in accordance with the *TBG Safeguarding Children and Vulnerable People Policy* and this *Safeguarding Incident Procedure.*

Training will be provided upon induction and ongoing, so that staff are aware of their responsibilities and feel comfortable in handling disclosures in line with this procedure.

4.1 HANDLING DISCLOSURES

Listed below are important aspects that can assist staff to provide immediate support and comfort to the vulnerable person at the point of disclosure and ensure the details are captured in an accurate and timely manner.

<u>Do</u>

- Give the vulnerable person your full attention, in a quiet private space
- Maintain a calm demeanour
- Allow the vulnerable person to take their time
- Allow the vulnerable person to use their own words, rather than leading them with questions
- Reassure the vulnerable person that they are doing the right thing by telling someone
- Accept the vulnerable person will disclose only what is comfortable for them and acknowledge the bravery/strength of the vulnerable person for talking about a difficult experience
- Explain to the vulnerable person what you plan to do next, i.e. that you will need to report their experience to someone else
- Report the disclosure without delay to the Safeguarding Lead or CEO, who will notify the appropriate authorities
- Immediately record the details of the disclosure in the Safeguarding Incident Register. If this is not possible as you are assisting the vulnerable person, note down the critical details to assist with recollection.

<u>Do Not</u>

- Promise confidentiality or make unrealistic promises of any kind
- Ask leading or probing questions, just listen supportively
- Ask the vulnerable person to repeat the details of the disclosure, as this can be distressing
- Investigate the claims made
- Confront the perpetrator
- Discuss the disclosure with people who do not need to know

It is responsibility of the SGL and Management to ensure obligations in respect to mandatory reporting, privacy and employment legislation are met in accordance with this Policy and related policies, and to notify the authorities of any matters involving sexual or other forms of reportable harm.

The SGL and Management will conduct any further investigation necessary after consulting police and other authorities as to the appropriate approach.

4.2   PROCESS MAP – SAFEGUARDING INCIDENT PROCEDURE

SAFEGUARDING INCIDENT PROCEDURE

STAFF BECOME AWARE OF SERIOUS INCIDENT/DISCLOSURE RECEIVED
From Child, Young or Vulnerable Person: Refer to Safeguarding Incident Reporting Procedure (section 4. of policy) for guidance.
From another employee: Remind of their rights under Whistleblower Provisions and the Safeguarding Vulnerable People Policy

Is an ambulance required to attend?
— Yes → If possible gain consent from the complainant. Dial 000 to request an ambulance
— NO ↓

NOTIFY GROUP SAFEGUARDING LEAD IMMEDIATELY

Reportable Conduct?
(refer to definition in policy pg 7)
Sexual Offence/Misconduct
Abuse - physical, psychological, emotional or neglect
Assault
— No → SGL works with QRSC and Management to investigate and resolve
— Yes → Contact Police to Report

Details entered into Safeguarding Incident Register

SGL works with Police and Management to investigate and provide details of complaint, disclosure

Feedback provided to the complainant throughout process

If a TBG staff member is the subject of the allegation/complaint/disclosure, SGL to ensure processes are actioned (i.e. suspension from interactions, rights to privacy are upheld)

Is an assessment required for changes to Policy/Process/Risk Assessment/Training?
— YES → Enter changes into Continuous Improvement Register
— NO ↓

SGL to notify TBG Board

Finalise details of actions/outcome in Safeguarding Incident Register

Advise all internal and external stakeholders (including Insurer and Department as required) of incident and any changes made to policy or process

SGL ensures all mandatory reporting and/or notifications required under the Reportable Conduct Scheme are actioned

Continue to provide support to parties as appropriate

APPENDICES

APPENDIX 1 - LEGISLATION BY JURISDICTION AND RELATING STANDARDS

[Australian child protection legislation | Australian Institute of Family Studies (aifs.gov.au)](#)

[Child protection legislation by jurisdiction - Australian Institute of Health and Welfare (aihw.gov.au)](#)

[Mandatory Reporting by jurisdiction of child abuse and neglect](#)

[National Child Safe Organisations](#)

[Victoria - Commission for Children and Young People - 11 Child Safe Standards](#)

APPENDIX 2 – SAFEGUARDING RISK ASSESSMENT

Please find following TBG's current risk assessment.

VERSION CONTROL

Version	Date	Change Summary	Author/Reviewer	Approved by:
2.	May 2025	Remove One Stop Training from scope and add SQUAD Addition of adherence to requirements outlined in Federal & State Chid Safety Practice Manuals in relation to disclosing or requesting information	Group Governance and Compliance Manager	EGM – Corporate Services

| 1 | June 2024 | Safeguarding Framework document compiled from TBG Child Safety strategy and policy documents, expanded to incorporate recommendations from Safeguarding Australia review.

Safeguarding Incident Procedure created. | Group Governance and Compliance Manager | EGM – Corporate Services |