

## Safeguarding Children, Young People, and Vulnerable Adults Policy

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### 1 Our Commitment

MercyCare is dedicated to safeguarding children, young people, and vulnerable adults through a structured Safeguarding Policy Framework, approved and overseen by the MercyCare Board. This framework ensures our policies, procedures, and practices align with best practice safeguarding principles and legislative requirements.

We uphold a zero-tolerance approach to abuse and neglect, and we are committed to upholding the rights of children, young people, and vulnerable adults to feel safe and be safe when participating in our organisation's activities. Our priority is to create a safe and supportive space within our operating environment, where all individuals feel protected, valued, and empowered. MercyCare is committed to embedding trauma-informed approaches within safeguarding practices, ensuring that all responses to harm are sensitive, appropriate, and prioritise the wellbeing of those affected.

### 2 Our Approach

At MercyCare, safeguarding is embedded in all aspects of our operations. We take a proactive and continuous improvement approach to ensure the safety and wellbeing of children, young people, and vulnerable adults. Our safeguarding practices are structured around key focus areas:

#### Safeguarding Standards & Compliance

- Establishing and maintaining a Safeguarding Policy Framework that aligns with legislative and regulatory requirements.
- Regularly reviewing and updating safeguarding policies under the Policy Management Framework.
- Ensuring all MercyCare people adopt appropriate safeguarding practices and behaviours to uphold a safe environment for children, young people, and vulnerable adults.
- Ensuring all MercyCare people are trained and equipped to identify and report abuse and neglect through training, policies, and guidance, with a focus on trauma-informed and victim-centred responses to disclosures.

### 3 People & Recruitment

- Conducting rigorous recruitment and screening to ensure the suitability of personnel working with children, young people, and vulnerable adults.
- Employing individuals who uphold safeguarding principles, in line with the Recruitment and Selection Procedure.
- Ensuring contractors, subcontractors, and agency staff meet safeguarding standards through ongoing supervision and compliance checks.
- Inducting all MercyCare people on safeguarding policies and requiring completion of online safeguarding training, in accordance with the Mandatory Training Policy.
- Providing ongoing training and education to strengthen safeguarding knowledge and awareness.
- Ensuring employees, volunteers, students, and contractors adhere to clear safeguarding expectations.
- Reinforcing expectations for ethical conduct, boundaries, and professional behaviour in interactions with children and vulnerable adults.

#### 4 Creating Safe Environments

- Ensuring all MercyCare people adopt appropriate safeguarding behaviours that prioritise the safety, rights, and wellbeing of children, young people, and vulnerable adults across all services.
- Ensuring all MercyCare people report any concerns, allegations, or incidents of abuse or neglect, whether occurring within MercyCare or externally, in line with our safeguarding policies and legal obligations. Reports must be made to management and, where appropriate, external authorities. This includes supporting staff who are mandatory reporters (e.g. educators) to meet their legal obligations while aligning with MercyCare's internal processes.
- Maintaining accessible and transparent reporting mechanisms to encourage a positive reporting culture where concerns are raised and addressed without fear of retribution, while ensuring that responses to disclosures prioritise the wellbeing of those impacted.
- Remaining vigilant to incidents of abuse and neglect that occur in a child or vulnerable person's life outside of MercyCare, such as at home, school or in the community, and reporting these concerns in line with our safeguarding procedures.
- Strengthen safeguarding practices in digital environments, including clear guidelines on online communication, privacy protections, and professional conduct in digital interactions.
- Embed equitable, inclusive, and culturally safe practices that recognise and respond to the diverse needs of children, young people, and vulnerable adults. This includes actively supporting participation in decision-making, particularly for Aboriginal and Torres Strait Islander peoples, people with disability, people from culturally and linguistically diverse backgrounds, LGBTQIA+ individuals, and those unable to live at home.
- Encourage the active involvement of service users and their families in creating a safe, inclusive, and supportive environment.
- Use feedback from complaints and compliments to inform safeguarding measures and drive continuous improvement.

#### 5 Consultation and Feedback

- Consulting with children, young people, vulnerable adults, their families, and MercyCare people to ensure policies remain effective, accessible, and inclusive.
- Providing safeguarding information in accessible formats via the MercyCare website and service enrolment.
- Ensuring MercyCare people receive updates on policy changes through recruitment, induction, training, and internal communications.
- Using feedback mechanisms, including complaints, compliments, and stakeholder consultations, to inform safeguarding improvements.

#### 6 Governance Responsibilities

- **Board** – Provides governance and oversight of safeguarding practices, ensuring that MercyCare remains compliant with all safeguarding policies and legislative requirements. Approves and endorses the Safeguarding Policy Framework.
- **CEO** – Ensures organisation-wide adherence to safeguarding commitments and policies, delegating operational responsibilities where appropriate.
- **Care Quality Committee** – Review and make recommendations to the Board with regards to safeguarding matters.

- **Safeguarding Reference Group (SRG)** - Provides cross-organisational leadership on safeguarding, offering strategic oversight and advice on safeguarding risks, compliance, training, and continuous improvement.
- **Executive Leadership Team (ELT)** – Oversees policy implementation, monitors compliance, and ensures safeguarding informs strategic planning and service delivery.
- **Safeguarding and Inclusion Manager** – Leads the continuous improvement of safeguarding policies and procedures, embedding a strong safeguarding culture within the organisation.
- **Managers** – Promote and enforce safeguarding policies, foster a positive reporting culture, and ensure compliance within their teams.
- **People & Culture** – Implement rigorous recruitment, screening, and training processes to ensure that all MercyCare people meet safeguarding expectations.
- **Employees, Volunteers, Students, and Contractors** – Understand and comply with safeguarding policies, undertake required training, and actively contribute to maintaining a safe environment.

## 7 Definitions

At MercyCare, our paramount concern is safeguarding the wellbeing of children, young people, and vulnerable adults. This policy defines the types of abuse and harm we actively work to prevent, including:

- **Physical Abuse:** Any non-accidental act that causes or may cause physical harm or injury. This includes hitting, slapping, pushing, kicking, or any other form of physical violence.
- **Emotional Abuse:** The persistent emotional ill-treatment of a child, young person, or vulnerable adult, causing severe and adverse effects on their emotional and psychological wellbeing. This may involve intimidation, humiliation, verbal abuse, rejection, or isolation.
- **Sexual Abuse:** Involves forcing or enticing a child, young person, or vulnerable adult to take part in sexual activities. It includes any form of non-consensual sexual contact, exploitation, grooming, or exposure to inappropriate sexual content.
- **Grooming:** Deliberate actions taken to build a relationship with a child, young person, or vulnerable adult for the purpose of sexual exploitation, manipulation, or abuse. This involves establishing trust and emotional connection to facilitate harmful interactions.
- **Neglect:** The persistent failure to meet a person's basic physical and emotional needs, leading to significant impairment of their health, development, and wellbeing. Neglect can be physical, medical, emotional, cultural, or educational and includes inadequate supervision, lack of proper nutrition, and failure to provide necessary medical care.
- **Family Violence:** Abuse or violence occurring within a family or domestic setting, which can have severe physical and emotional impacts. This includes intimate partner violence, child abuse within the family, and violence between family members.
- **Exploitation:** The manipulation, coercion, or abuse of a child, young person, or vulnerable adult for personal, financial, or criminal gain. This includes sexual exploitation, forced labour, human trafficking, and financial abuse.
- **Near Miss:** A situation where an incident could have resulted in harm to a child, young person, or vulnerable adult but was prevented or did not occur. Near misses should be documented and reviewed to strengthen safeguarding practices and prevent future risks.

MercyCare actively monitors and addresses other forms of harm, such as bullying, harassment, discrimination, self-harm, suicidal ideation, financial abuse, and online safety concerns, as part of a comprehensive safeguarding approach.

## 8 Evaluation and Continuous Improvement

To ensure compliance and continuous improvement, MercyCare will:

- Conduct regular evaluations through audits, surveys, complaints, incident reports, and near miss reports.
- Monitor and address safeguarding risks proactively.
- Communicate policy updates and learnings from safeguarding incidents to all personnel.

## 9 Internal References

- Code of Conduct
- Complaints and Feedback Policy
- Elder Abuse Procedure
- Incident Management Procedure – Safeguarding
- Incident Reporting and Escalation Procedure
- Mandatory Training Policy
- Policy Management Framework
- Recruitment, Selection, and Appointment Procedure
- Responding to Child Abuse, Neglect, and Other Harms Policy and Procedure
- Safeguarding Children and Young People Procedure
- Safeguarding Governance Framework
- Safeguarding Vulnerable Adults Policy and Procedure – Disability Services
- Serious Incident Response Scheme (SIRS) Procedure
- Service User Incident and Feedback Policy

## 10 Legislation and Standards

- Aged Care Act 1997
- Australian Human Rights Commission National Principles for Child Safe Organisations
- Children and Community Services Act 2004
- Code of Ethics for Youth Workers in WA
- National Catholic Safeguarding Standards
- National Disability Insurance Scheme Act 2013
- National Principles for Child Safe Organisations
- NDIS Practice Standards
- Parliamentary Commissioner Amendment (Reportable Conduct) Act 2022
- Privacy Act 1988

Approved by: MercyCare Board  
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