

## Client Protection Policy

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Policy Owner: CEO  
Policy approved: 30 May 2019  
Policy last updated: 11 December 2019 (structural changes only)

### Policy objective

- To ensure that all parties are aware of their responsibilities of identifying possible occasions where a client is at risk
- To work towards an organisational culture of vulnerable person's safety.
- To ensure that all parties are aware of their responsibilities of identifying possible occasions for abuse and for establishing controls and procedures for preventing such abuse and/or detecting such abuse when it occurs.
- To provide guidance to staff, volunteers and contractors as to what action should be taken where they suspect any abuse within or outside of the organisation.
- To provide a clear statement to Board members, staff, volunteers and contractors forbidding any such abuse.
- To provide assurance that any and all suspected abuse will be reported and fully investigated.

### Application of Policy

This policy applies to all Board members, staff contractors and volunteers.

### Definition

A vulnerable person means:

- a Child or Children – **note** this is covered under the Child Protection Policy
- an individual aged 18 years and above who is or may be unable to take care of themselves, or is unable to protect themselves against harm or exploitation by reason of age, illness, trauma or disability, or any other reason.

Abuse can consist of one or more of the following but is not restricted to these:

**Elder Abuse:** a single or repeated act, occurring in any relationship where there is an expectation of trust, which causes harm or distress to an older person.

**Physical Abuse:** any non-accidental physical injury resulting from practices such as: hitting, punching, kicking (marks from belt buckles, fingers), shaking, burning (irons, cigarettes), biting, pulling out hair, alcohol and /or other drug administration.

**Sexual Abuse:** any assault or abuse of a sexual nature, sexual molestation, indecent exposure, sexual harassment or intimidation.

**Emotional Abuse:** the chronic attitude or behaviour of one person which is directed at another person, or the creation of an emotional environment which erodes a person's self-

esteem and social confidence over time. Behaviours may include: insulting, bullying, ignoring, rejecting, corrupting, isolating, terrorising or other extreme acts in the vulnerable person's presence.

**Financial Abuse** may include:

Activities by an attorney in violation of their powers, duties and responsibilities under an Enduring Power of Attorney (EPA).

- Misappropriation of money, valuables or assets
- Forging signatures on cheques,
- Denial of Access to personal assets
- Accessing a person's funds electronically and/ or
- Forced or unauthorised changes to legal documents.

**Neglect:** characterised by the failure to provide for basic needs. Any serious omission or commission which jeopardises or impairs a person's health or development.

## Policy

Oonah is committed to promoting and protecting the interests and safety of all clients at all times. We have zero tolerance for the abuse of vulnerable people.

The protection of vulnerable people is a shared responsibility between Oonah, all employees, Board members, contractors and volunteers.

Oonah is committed to building an environment and culture where a victim, staff member, contractor or volunteers feel able to report such abuse.

Everyone working at Oonah is responsible for the care and protection of vulnerable people and reporting information about abuse.

You do not need to be absolutely certain that abuse has occurred, and you do not need to have proof. You do, however, need to have a reasonable belief of abuse occurring. This belief may be based on communication (e.g. a disclosure) and/or observations (e.g. indicators of abuse). If you are unsure about whether to report a concern seek direction from your immediate supervisor.

If you believe a client is in immediate danger call 000.

## Procedures

### Responsibilities

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The Board has ultimate responsibility for the detection and prevention of the abuse of a vulnerable person and is responsible for ensuring that appropriate and effective internal control systems are in place. The Board is also responsible for ensuring that appropriate policies and procedures and a Code of Conduct are in place.

The CEO must ensure that they:

- Promote vulnerable people safety at all times

- Assess the risk of abuse within their area of control and eradicate / minimise any risk to the extent possible
- Educate employees about the prevention and detection of vulnerable person abuse
- Ensuring that all adults within Oonah are aware of their obligation to report suspected abuse of a vulnerable person in accordance with these policies and procedures
- Ensuring that all staff, contractors and volunteers are aware of their obligation to observe the Code of Conduct (particularly as it relates to the safety of vulnerable people)
- Providing support for staff, contractors and volunteers in undertaking their vulnerable person protection responsibilities.
- Dealing with and investigating reports vulnerable person abuse
- Facilitate the reporting of any inappropriate behaviour or suspected abusive activities.

Everyone should

All staff, volunteers and contractors share in the responsibility for the prevention and detection of abuse, and must:

- Familiarise themselves with the relevant laws, the Code of Conduct, and Oonah's policy and procedures in relation to vulnerable person protection and comply with all requirements.
- Familiarise themselves with the types of abuse that might occur within their area of responsibility and be alert for any indications of such conduct.
- Report any reasonable belief that a client's safety is at risk to the relevant authorities (such as the police)
- Report any suspicion that a client's safety may be at risk to their supervisor (or if their supervisor is involved in the suspicion, to a reasonable person in the organisation)
- Provide an environment that is supportive of all client's emotional and physical safety.
- Have a duty of care to participants

Duty of care includes:

- Provision of suitable and safe premises
- Provision of an adequate system of supervision
- Implementation of strategies to prevent bullying
- Ensuring that medical assistance is provided to a sick or injured client
- Managing employee recruitment, conduct and performance.

The duty is non-delegable, meaning that it cannot be assigned to another party.

**Reporting:**

Any staff member, volunteer or contractor who has grounds to suspect abusive activity must immediately notify the appropriate authorities or the police.

They should also advise their supervisor about their concern.

In situations where the supervisor is suspected of involvement in the activity, or if the person having the suspicion does not believe that this matter is being appropriately addressed or dealt with, the matter should be reported to the next highest level of supervision.

Supervisors must report complaints of suspected abusive behaviour or misconduct to the CEO or Chair and potentially to the police.