



Safeguarding Code of Conduct

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Next Review: April 2023
Approved by: Board

Aim:

Warrambui aims to provide children, young and vulnerable people with a positive and enriching catered accommodation environment and to deliver programs that are educational, exciting and life changing.

We are committed to safeguarding children, young and vulnerable people at Warrambui's site and ensuring that they feel safe and are safe. Accordingly, Warrambui wishes to ensure that Warrambui's Personnel strive for the highest possible standards with respect to safeguarding children, young and vulnerable people from abuse. To that end Warrambui has developed this Safeguarding Code of Conduct to identify clear expectations for behaviour towards and in the presence of children, young and vulnerable people, and thereby prevent behaviour that may be harmful to them.

Developed to protect children, young and vulnerable people visiting, staying or residing at Warrambui's site, the Safeguarding Code of Conduct has been formally approved and endorsed by Warrambui's Board.

Personnel should read this Safeguarding Code of Conduct in conjunction with:

- understanding the specific requirements of their role as defined in the 'Position Description' statement
- having current knowledge of our relevant policy and procedure documents, including our:
 - Safeguarding Children, Young and Vulnerable People Policy
 - Responding to Child Abuse Reports and Allegations Policy
- familiarity with all applicable laws (listed in this document)
- understanding of general community expectations in relation to appropriate behaviour between adults and children.

As part of the commitment to observing the behavioural guidelines as set out in this Code of Conduct, our organisation requires all Frontline Personnel to sign our organisation's Commitment to Safeguarding Children, Young and Vulnerable People Form, acknowledging that they have read and are committed to;

- adhering to Warrambui's Safeguarding Program
- reporting any criminal conviction or charge subsequent to their employment/engagement that may present a potential risk to children, young and vulnerable people.

Employees and volunteer Interns will also be required to sign a "Position Description" which includes responsibilities to support safeguarding of children, young and vulnerable people.

Referenced Documentation

- Request to Participate in a TPM Camp Without Taking Leave Form
- Declaration of Pre-Existing or Incidental Relationships Form
- Request to Keep Uniform Form

Related Legislation

Our guidelines comply with relevant legislation.

- Children and Young Persons (Care and Protection) Act 1998 (NSW)
- Children and Young Persons (Care and Protection) Amendment (Parental Responsibility Contracts) Act 2006(NSW)
- Child Protection (Offenders Registration) Act 2000 (NSW)
- Crimes Act 1900 (NSW)
- Commission for Children and Young People Act 1998 (NSW)
- The Ombudsman Act 1974 (NSW)
- Family Law Act 1975 (Cth)
- Children and Young Persons (Care and Protection) Amendment Bill 2009

Scope

The Safeguarding Code of Conduct applies to all Personnel, including staff, Board members, volunteers and contractors involved with Warrambui.

This Policy applies in all our operational environments and without fail wherever children, young or vulnerable people are participating in our organisation's programs, services or facilities.

Warrambui considers a failure to observe this Safeguarding Code of Conduct as misconduct, and will take appropriate disciplinary action. Such disciplinary action may, depending on the seriousness of the misconduct, include suspension while matters are investigated and/or dismissal. In addition to any internal disciplinary proceedings, Warrambui will report to the police all instances in which a breach of the law has or may have occurred.

There may be exceptional situations where this Safeguarding Code of Conduct does not apply, for example, in an emergency situation. However, it is crucial that, where possible, Personnel seek management authorisation prior to taking action that contravenes the Safeguarding Code of Conduct or that Personnel advise management as soon possible after any incident in which the Safeguarding Code of Conduct was breached.

Definitions

Child or young person	A person under the age of eighteen years.
Safeguarding Code of Conduct	The rules of behaviour outlining the proper practices for Warrambui Personnel, that includes what is and is not acceptable or expected behaviour
Group/s	Collective term for guests at the site within one booking
Group Supervisor/s	Supervising adult guest in charge of welfare for other guests within a Group, e.g. Teacher, school group parent, youth camp leader.
Guest Contact	The preferred contact person, being a Group supervisor, for liaison between Warrambui and the accommodated Group.
Frontline Personnel	Includes any Personnel who are expected to interact directly with children, young or vulnerable people as part of their work at Warrambui. All employees, volunteer Interns and the Safeguarding Program Coordinator are Frontline Personnel.
Personnel	All who work for the organisation whether in a paid or unpaid capacity, including; employees, volunteers, Board and committee members, and contractors.

Responsibilities

Board	<ul style="list-style-type: none"> Support Code of Conduct review on an 18-month cycle as a minimum or at a time governed by legislation, regulations, or organisational learnings that prompt a change to this Code of Conduct.
Centre Director	<ul style="list-style-type: none"> Implement policy and procedures across the organisation Ensure Personnel have access to and understand this Safeguarding Code of Conduct and related procedures Ensure all managers/supervisors have access to support and advice to understand and implement procedures
Safeguarding Program Coordinator	<ul style="list-style-type: none"> Review and update this document and supporting resources in consultation with relevant stakeholders Support the coordination and implementation of the Safeguarding Program Provide training and advice in the application of procedures
Managers / Supervisors	<ul style="list-style-type: none"> Ensure procedures are followed and implemented
Employees / Volunteers	<ul style="list-style-type: none"> Compliance with procedures

Key Requirements

Warrambui's Safeguarding Code of Conduct addresses the major areas where Personnel interact with the children, young and vulnerable people who visit Warrambui. Warrambui has developed this Safeguarding Code of Conduct to help Personnel to safeguard those children, young and vulnerable people from abuse or neglect.

Guest Groups responsibilities

Warrambui expects that Groups with children, young vulnerable people attending will follow all Warrambui required policies and procedures as well as any additional legal and/or professional requirements – e.g. Teachers will adhere to their professional Safeguarding Code of Conduct and church youth leaders will comply with their church policies and procedures. In the event of an incident, Warrambui policies and procedures supersede the Guest Groups policies.

Sexual misconduct

Under no circumstances is any form of 'sexual behaviour' to occur between, with, or in the presence of, children, young or vulnerable people attending Warrambui. Engaging in sexual behaviour while participating in Warrambui's service is prohibited even if the young or vulnerable people involved may be above the legal age of consent.

'Sexual behaviour' needs to be interpreted widely, to encompass the entire range of actions that would reasonably be considered to be sexual in nature, including but not limited to:

- 'contact behaviour', such as sexual intercourse, kissing, fondling, sexual penetration or exploiting a child through prostitution
- 'non-contact behaviour', such as flirting, sexual innuendo, inappropriate text messaging, inappropriate photography, or exposure to pornography or nudity.

Positive guidance and behavioural expectations

We strive to ensure that children, young and vulnerable people attending Warrambui are aware of the acceptable limits of their behaviour so that Warrambui can provide a positive experience for all participants.

Children, young and vulnerable people are informed of their rights and are encouraged to have their say and participate in all relevant organisational activities and decisions, particularly in relation to matters affecting them. Children, young and vulnerable people are given information about the behaviour our organisation expects from them, the behaviour they can expect from our Personnel, their right to safe participation in activities and access to information about child abuse prevention programs.

However, there are times when Personnel may be required to use appropriate techniques and behaviour management strategies to ensure:

- an effective and positive environment
- the safety and/or wellbeing of children, young and vulnerable people attending or Personnel working at Warrambui.

We require Warrambui's Personnel to use strategies that are fair, respectful and appropriate to the developmental stage of the children, young and vulnerable people involved. The child, young or vulnerable person needs to be provided with clear directions and given an

opportunity to redirect their misbehaviour in a positive manner.

Under no circumstances are Warrambui's Personnel to take disciplinary action involving physical punishment or any form of treatment that could reasonably be considered as degrading, cruel, frightening or humiliating.

Promoting equity and diversity

Warrambui Personnel must ensure that their interactions with children, young and vulnerable people are sensitive, respectful and inclusive of all backgrounds and abilities. Our Personnel must actively anticipate children, young and vulnerable people's diverse circumstances and respond effectively to those with additional vulnerabilities.

Where our organisation has involvement with children, young and vulnerable people who are Aboriginal or Torres Strait Islander, from culturally and/or linguistically diverse backgrounds, have a disability, are LGBTQI+ and those who are unable to live at home, our Personnel will promote their safety (including cultural safety), participation and empowerment.

Our organisational culture is inclusive and respectful of the different ways that families are formed and structured. Our personnel are to respect decisions that people make about their gender identity and consult and support children, young vulnerable people to feel, and to be, safe.

Warrambui Personnel will actively promote the safety (including cultural safety), participation and empowerment of children, young and vulnerable people regardless of their race, religion, background, level of ability or identity.

Discrimination

We expect Personnel to treat all children, young and vulnerable people fairly, equally and with dignity. Our organisation abides by the United Nations Convention on the Rights of a Child. All actions and behaviours from our Personnel must be non-discriminatory and always in the best interests of the child, young or vulnerable person.

No one within our organisation will be discriminated against based on age, gender, race, colour, language, disability, religion, political or other opinion, sexual orientation, national or social origin or their ability to live at home. Everyone has the right to feel safe and be free from such discrimination.

Warrambui does not tolerate such discriminatory behaviours, and prejudiced attitudes will be challenged. Our Personnel must have working knowledge of our complaints handling processes to provide support and access to information should any child, young or vulnerable person in our service - or their family - require it.

Professional role boundaries

Warrambui Personnel must not, of their own volition or at the request of a service user, act outside the confines of their duties (as specified in their position description) when helping to deliver Warrambui's services.

For example:

- Personnel must not provide unauthorised transportation, for example, driving student guests into Murrumbateman for coffee
- non-program trained Personnel must not engage in activities with children, young or vulnerable people who are guests of Warrambui outside authorised role relevant contact, such as kitchen hands supervising the obstacle course.

Warrambui Personnel must adhere to professional role boundaries at all times, including activities external to Warrambui.

For example:

- Personnel must not provide any form of support to a child, young or vulnerable person who has stayed at Warrambui, or to their family, unrelated to Warrambui's services, for example, babysitting, tutoring or financial donations.
- Personnel must not have contact with children, young or vulnerable people who have stayed at Warrambui outside Warrambui's services; such as personal connections via social media (requested or requesting).
- Personnel must not accept an invitation to attend any private social function at the request of a child, young or vulnerable person who has been, or is, a guest of Warrambui – or at the request of their family.
- must not develop any special relationships with children, young or vulnerable people that could be seen as favouritism. For example, a staff member giving gifts to a child.
- must not engage in open discussions of a mature or adult nature in the presence of children, young or vulnerable people. For example, volunteers discussing their private relationships in earshot of children.

For information on managing pre-existing or incidental relationships refer to the Managing Community Relationship section below.

If any of Warrambui's Personnel become aware of a situation in which a child, young or vulnerable person requires assistance that is beyond the confines of that person's role, or beyond the scope of Warrambui's usual service, they should at the earliest opportunity:

- refer the matter to an appropriate support person/agency or
- refer the child, young or vulnerable person to an appropriate support person/agency or
- contact the child, young or vulnerable person's Guest Contact, parent or guardian or carer, (whomever is at camp, available first and is not part of the concern) or
- refer the matter to the Ministry Manager or Centre Director, or,
- seek advice from management.

Warrambui Personnel who participate in a camp as a 'guest', or 'camper' may not represent or act in employment of Warrambui for the duration of the camp and must be on leave for the duration of the camp.

Turing Point Ministries (TPM) camps are the only exemption to this rule. If Warrambui Personnel wish to participate in a TPM camp as a 'guest' or 'camper', they may also act in employment of Warrambui if they have completed a 'Request to Participate in a TPM Camp Without Taking Leave' form. This form must be approved by both an authorised TPM representative and authorised Warrambui representative before it is considered to be complete.

Managing community relationships

Warrambui Personnel are not permitted to begin a new relationship with a child who has previously attended Warrambui in the last 12 months, or to use their position at Warrambui to further an existing relationship with such a child or their family.

However, Warrambui recognizes that we are placed in a small local community, and embedded in a tight, closely connected Lutheran community; where our Personnel are highly likely to have existing connections and interactions with guests of the site. There is also potential for incidental relationships to occur after a child's stay at Warrambui that are unrelated to the child's stay.

All pre-existing relationships (relationships in place prior to a child's attendance at Warrambui) must be declared to the Centre Director, by completing the 'Declaration of Pre-Existing or Incidental Relationships' form. Where approval is required in order to complete the form, approval must be granted by the Centre Director (or Board Chair if the Centre Director is the applicant) prior to resuming any relationship.

Examples of pre-existing relationships include:

- Personnel who have attended the same church as a child and their family over many years
- Family members of Personnel who attend Warrambui camps such as children, step-children, nephews or nieces.
- A child being tutored by Personnel prior to their stay at Warrambui. Tutoring is independent from their role at Warrambui
- A child has attended a TPM camp, at which Personnel were involved as a guest or camper.

All incidental relationships (relationships occurring after a child's attendance at Warrambui, but not related to the child's stay at Warrambui) must be declared to the Centre Director, by completing the 'Declaration of Pre-Existing or Incidental Relationships' form. Where approval is required in order to complete the form, approval must be granted by the Centre Director (or Board Chair if the Centre Director is the applicant) prior to resuming any relationship.

Examples of incidental relationships include:

- A child joins a football club in which Personnel are already involved
- Personnel volunteer at their child's school and meet children who have previously stayed at Warrambui
- Personnel may be members of social networking groups, external to Warrambui through which connections may arise.

Generally, incidental relationship exemptions will only be approved when the Centre Director or Board Chair is satisfied that the relationship does not exist due to the child's stay at Warrambui.

The Centre Director or Board Chair is under no obligation to approve a request for exemption from this Safeguarding Code of Conduct. Further, the Centre Director or Board Chair may impose additional requirements in order to approve an exemption. This may include a parent/guardian acknowledgement in writing that they approve of the relationship, a letter to the group that the child attended Warrambui with, or any restrictions that the approver deems appropriate.

Uniform or identity card

Our Personnel wear their uniform only while involved in delivering service or as required by Warrambui, such as when representing Warrambui at designated functions, and while travelling to and from work.

Volunteers and Visitors are all assigned and wear clearly marked Warrambui passes, badges or clothing (such as safety vests), only in delivery of Warrambui services or related work at the site.

Unless otherwise approved, all items of uniform are returned when Personnel cease employment. However, some items of personalized clothing may be retained (on approval from the Centre Director). Where an item of uniform is retained, former Personnel are required to commit to, and understand that they are not permitted to wear their former uniform while at Warrambui, nor at public functions, as this may be construed to be misrepresentation. Please refer to the 'Request to Keep Uniform' form.

Use of language and tone of voice

Language and tone of voice used in the presence of children, young and vulnerable people should:

- provide clear direction, boost their confidence, encourage or affirm them
- not be harmful – in this respect, avoid language that is:
 - discriminatory, racist or sexist; or
 - derogatory, belittling or negative, for example, by calling a child a 'loser' or telling them they are 'too fat'; or
 - intended to threaten or frighten; or
 - profane or sexual.

Supervision

Warrambui requires that Groups provide supervision during their attendance at the site. Warrambui Personnel are responsible for delivering the programs in which children, young and vulnerable people may participate.

During delivery of those programs, Warrambui expects that those supervising the participants; and our Personnel where they are contributing to the supervision, work to ensure participants:

- engage positively with Warrambui's program intent, for example, archery – being a safe, adventurous and confidence building program.
- behave appropriately toward one another, for example, providing constructive and encouraging comment while participants attempt new skills.
- are in a safe environment and are protected from external threats, for example, remaining in pairs during bushwalks.

Our Personnel are required to avoid one-to-one unsupervised situations with children, young and vulnerable people to whom Warrambui provide services, and (where possible) to conduct all activities and/or discussions with service recipients in view of other Personnel.

In deciding on the nature and extent of supervision required, regard needs to be given to:

- age, level of maturity, ability, number, nature and characteristics of the children and young people,
- the nature and timing of the activity, and
- the physical and online environment.

Use of electronic and online communications

We prohibit all online and electronic communication between Warrambui's Personnel and the children, young and vulnerable people to whom Warrambui provide service – without the express permission of the Centre Director and parent/guardian/carer.

Under no circumstances should Personnel request a child, young or vulnerable person to keep a communication a secret from their parents.

All Warrambui's Personnel are required to follow Warrambui's 'ICT' Policy in relation to browsing websites on Warrambui's organisation's computers. This is reinforced during induction and refresher training.

Children, young and vulnerable people are not permitted to use Warrambui's electronic communication platforms. Use of Warrambui's internet access service is provided only with supervising adult permission, with that adult then becoming responsible for supervising the use. The supervising adult needs to ensure that the child, young or vulnerable person does not inadvertently place themselves at risk of abuse of exploitation via social networking sites, gaming sites, through web searches, or inappropriate email communication.

Giving gifts

Gifts include rewards, prizes, treats, or second-hand equipment.

Giving of gifts by Warrambui's Personnel to children, young and vulnerable people to whom Warrambui provide, or have provided a service is subject to:

- obtaining prior authorisation from the Centre Director (or Board Member, in the case of the Centre Director) and
- parents, guardians or carers being made aware in advance of any gift given.
- Personnel are not to give gifts of a personal nature that encourages a child, young or vulnerable person to think they have an individual and special relationship.
- Singling out of an individual child, young or vulnerable person within our organisation to give a gift to, is not permitted.

Note, having a declared relationship (refer to the Declaration of Pre-Existing or Incidental Relationships form) meets this requirement where the gift is given outside of the Warrambui context.

Photographs of children, young and vulnerable people

Warrambui permits photography by Warrambui Personnel, of children, young and vulnerable people under the Safeguarding Code of Conduct **only under the following conditions:**

- children, young and vulnerable people to whom Warrambui deliver service are to be photographed **only** while involved in Warrambui's programs and camps **and only** if:
 - our Centre Director or the applicable Guest Contact has granted prior and specific approval
 - the context is directly related to participation in Warrambui's Programs
 - the child is appropriately dressed and posed
 - the image is taken in the presence of other Personnel.
- Images are not to be distributed (including as an attachment to an email) to anyone outside Warrambui other than the child photographed or their parent, without management knowledge and approval.
- Images (digital or hard copy) are to be stored in a manner that prevents unauthorised access by others, for example:
 - if in hard-copy form, in a locked drawer or cabinet
 - if in electronic form, in a restricted access folder.
- Images (digital or hard copy) are to be destroyed or deleted as soon as they are no longer required.
- Images are not to be exhibited on Warrambui website, or Warrambui social media sites, without parental knowledge and approval, or such images must be presented in a manner that de-identifies the child, young or vulnerable person. Any caption or accompanying text may need to be checked so that it does not identify a child, young or vulnerable person if such identification is potentially detrimental.

Physical contact with children, young and vulnerable people

Any physical contact with children, young and vulnerable persons must be appropriate to the delivery of Warrambui's activities, programs and services, and be based on the needs of the child, young or vulnerable person rather than on the needs of Warrambui's Personnel. Where physical assistance is likely, the supervising adult (e.g. program Personnel, a teacher or a parent) should inform the child, young or vulnerable person of what contact is going to happen, and provide them with the opportunity to say no if they choose.

Examples that arise in our work include contact such as physical assistance when assisting a young child with archery or on in preventing a child from falling dangerously on the obstacle course.

Under no circumstances should any of Warrambui's Personnel have contact with children, young or vulnerable people attending Warrambui that:

- involves touching:
 - of genitals
 - of buttocks
 - of the breast area (female children)
- that is other than as part of delivering medical or allied health services. Any accidental contact of these areas that occurs, such as catching a falling child on the obstacle course, must be followed by an immediate apology and reported to the Centre Director as soon as practicable.. Should the accidental contact be made by the Centre Director, it must be reported to the Operations Manager would appear to a reasonable observer to have a sexual connotation
- is intended to cause pain or distress to the child, young or vulnerable person – for example corporal punishment
- is overly physical – as is, for example, wrestling, horseplay, tickling or other roughhousing
- is unnecessary – as is, for example, assisting with toileting when a child does not require assistance
- is initiated against the wishes of the child, young or vulnerable person, except if such contact may be necessary to prevent injury to the child, young or vulnerable person or to others, in which case:
 - physical restraint should be a last resort
 - the level of force used must be appropriate to the specific circumstances, and aimed solely at restraining the child, young or vulnerable person to prevent harm to themselves or others
 - the incident must be reported to management as soon as possible.

Our Personnel are required to report to the Ministry Development Manager or Centre Director any physical contact initiated by a child, young or vulnerable person that is sexual and/or inappropriate, for example, acts of physical aggression, as soon as possible, to enable the situation to be managed in the interests of the safety of the child, young or vulnerable person, Warrambui's Personnel and any other participants.

Sleeping arrangements

Guest Contacts are provided with a facility plan, and are responsible for allocating rooms and establish sleeping arrangements according to the particular group requirements. Warrambui expects that groups with children and vulnerable people attending will be managed in a way that safeguards them from abuse, following but not limited to the below standards of conduct, where appropriate.

Standards of conduct must be observed by Warrambui's Personnel particularly noting:

- that most guests attend for overnight stays,
- Warrambui Personnel work early and late hours, and
- Personnel and their families reside on site.

Personnel conduct must be considerate of:

- providing children, young and vulnerable people with privacy when bathing and dressing
- observing appropriate dress standards when children, young and vulnerable people are present – such as no exposure to adult nudity
- not allowing children, young or vulnerable people to be exposed to pornographic material, for example, through movies, television, the Internet or magazines
- not providing sleeping arrangements that may compromise the safety of children, young and vulnerable people such as unsupervised sleeping arrangements, or an adult sleeping in the same bed as a child, young or vulnerable person
- the right of children to contact their parents, or others, if they feel unsafe, uncomfortable or distressed during the stay
- parents expecting that their children can, if they wish, make contact.

Should Personnel observe, or suspect, that sleeping arrangements are inappropriate or compromise the safety of children, young or vulnerable people, this must be reported to the Centre Director immediately.

Change room and bathroom arrangements

Warrambui expects that group supervisors will supervise children, young and vulnerable people's use of change rooms while balancing that requirement with a child, young or vulnerable person's right to privacy. In addition:

- Warrambui Personnel must not enter a change room or bathroom currently being used by children, young or vulnerable people.
- Warrambui Personnel may only enter a change room or bathroom area for scheduled or essential cleaning or maintenance when guests are on site. Personnel must knock loudly and identify themselves prior to entering the area, determine whether anyone is in the area, not enter if the facilities are in use, and/or take a Group Supervisor with them as required. Personnel must use signage to indicate that cleaning or maintenance is in progress and the bathroom/change room is closed.
- Personnel are not permitted to use the change rooms or bathroom areas allocated to a Group for their use.
- Female Personnel are not to enter male change rooms and male Personnel are not to enter female change rooms while guests are on site, apart from scheduled cleaning as above (or if required for urgent cleaning and maintenance, must do so with a Group Supervisor).

Should Personnel observe, or suspect, that the supervision of the change rooms and bathrooms is inappropriate or compromise the safety of children, young or vulnerable people, this must be reported to the Centre Director immediately.

Use, possession or supply of alcohol or drugs

Refer also to the 'Alcohol and Other Drugs' policy.

While on duty, Personnel must not:

- use, possess or be under the influence of an illegal drug
- be under the influence of alcohol
- be incapacitated by any other legal drug such as prescription or over-the-counter drugs
- supply alcohol or drugs (including tobacco) to children, young or vulnerable people attending Warrambui.

Personnel use of legal drugs other than alcohol is permitted, provided such use does not interfere with their ability to care for children, young or vulnerable people involved in Warrambui's service.

Transporting children

Children, young and vulnerable people are to be transported only in circumstances that are directly related to Warrambui's emergency management plan, medical issues arising or with prior authorisation from the Centre Director, Ministry Manager or Operations Manager and from the parent/guardian/carer. Gaining approval involves providing information about the proposed journey, including:

- the form of transport proposed, such as private car or Warrambui vehicle
- the reason for the journey
- the route to be followed, including any stops or side trips
- details of anyone who will be present during the journey other than Warrambui's Personnel who are involved in delivering Warrambui's services

Reporting obligations

All Personnel are expected to make a report immediately to the Centre Director or Duty Manager (i.e., before the end of their session of work) if:

- they become aware of any allegations of child abuse
- they have a concern for the safety of a child, young or vulnerable person in our services
- they notice any member of Personnel whose practice or behaviour is contrary to the expectations of behaviour set out in this Safeguarding Code of Conduct.
- Personnel are to refer to the Responding to Child Abuse Reports and Allegations Policy for detailed guidance when making a report.

Communication and Training

We communicate Warrambui's Safeguarding Code of Conduct requirements to all Warrambui Personnel. Warrambui involves our Personnel in reviews of Safeguarding Code of Conduct requirements. Warrambui communicates any significant alterations to Warrambui's Safeguarding Code of Conduct requirements and resources to all Frontline Personnel.

Our organisation ensures all new Personnel are informed and supported to understand Warrambui's safeguarding children, young and vulnerable people policies and procedures, paying particular attention to the practices detailed in this Code of Conduct.

Copies of this Code of Conduct and our organisation's Safeguarding Children, Young and Vulnerable People Policy, and Responding to Child, Young and Vulnerable Persons Abuse Reports and Allegations Policy are provided directly to Frontline Personnel, they are also publicly accessible and available in child-friendly versions.

Our organisation provides training and guidance relating to an individual's safeguarding responsibilities and offers opportunities to seek clarity in relation to the commitments and behavioural expectations set out in our safeguarding policies.

We provide regular ongoing training of our Personnel in relation to how keeping children, young and vulnerable people safe will be fulfilled. This includes training regarding children, young and vulnerable people's rights, voices and participation, cultural safety and humility.

Monitoring and Review

This document will be reviewed at least once every 18 months, in consultation with stakeholders. Some circumstances may trigger an early review, this includes but is not limited to legislative changes, organisational changes, incident outcomes and other matters deemed appropriate by the Board and/or Centre Director.

Where possible, we involve our Personnel in reviews of our practice and behavioural requirements and when there are any updates or changes to this Policy, they will be communicated to all personnel and stakeholders.

Warrambui retain records of each review undertaken. Such records may include minutes of meetings and documentation of changes to policies and procedures that result from a review.

External audit and verification based on a sample, conducted by the Australian Childhood Foundation shall occur at 3 yearly intervals.