

Compass Child Safeguarding Policy

Table of Contents

Compass Child Safeguarding Policy	1
1. Introduction	2
2. Statement of Commitment to Child Safeguarding.....	2
3. Purpose	2
4. Scope.....	2
5. Guiding Principles	3
6. Context.....	3
7. Compass Code of Conduct	4
8. Risk Assessment.....	4
9. Overview of Communication and Use of Children’s Images Guideline	5
10. Worker Recruitment and Selection & Training.....	5
11. Working with Partners	5
12. Responding to and reporting child protection concerns	6
13. Responding to disclosure by a child.....	6
14. Mandatory reporting in NSW.....	6
15. Policy Review and Audit.....	7
Procedure:	7
16. Legislation and Compliance	7
17. Related documents and resources	8
18. Responsibilities	8
19. Document Control	9
20. Records	9
21. Definitions.....	9
22. Document Information	10
23. Version Administration	10
24. Appendices	11
Appendix 1 Compass Code of Conduct Policy (POL-028-4)	12
Appendix 2 Compass’ Communication of Children’s Information and Images Guideline	20
Appendix 3 Compass’ Worker Recruitment and Selection	21
Appendix 4 Compass’ Working with Partners (Child Safeguarding) Guideline.....	24
Appendix 5 Compass’ Child Abuse Reporting Procedure (PROC-012-04).....	25

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Document No: **POL-003-2** Version **v1** Document Title: **Child Safeguarding Policy**

1. Introduction

Compass Housing Services Co Ltd (Compass) recognises that by the nature of work, our operations may pose a risk to children, therefore, this Child Safeguarding Policy has been developed to proactively aim to identify and mitigate those risks.

2. Statement of Commitment to Child Safeguarding

Compass is committed to the safety and wellbeing of children. We support the rights of children and will act to ensure a child safe environment is maintained.

3. Purpose

The purpose of this policy will demonstrate Compass' commitment to protect children from all harm and abuse.

As a signatory to the ACFID Code of Conduct, Compass is obligated to have policies and procedures implemented which promote the safety and wellbeing of all children accessing its services and programs, in particular to minimise the risk of abuse of children.

The policy aims to educate staff and others about child abuse and promote a child safe culture where everyone is committed to keep children safe.

In addition, the policy identifies the mandatory reporting requirements for Compass workers in NSW. Compass and our NSW support partners providing residential services have a legislative requirement to report suspected child abuse or neglect to government authorities.

For other jurisdictions in which Compass and our support partners provide services to children, wholly or partly, Compass commitment to the safety and wellbeing of children extends the obligation of workers to report suspected child abuse or neglect to the relevant authorities in those jurisdictions.

4. Scope

This policy applies to all Compass Directors, Committee Members, Workers, Associates, Partners and consultants (including researchers, photographers etc.) engaged on short or long term contracts to carry out national and international business activities on behalf of Compass.

Associates' refers to others not included in the Section 16 Definitions of this policy for Directors, Committee Members and Workers and include visitors to our programs (including media), advisory group members, interns, supporters (donors, sponsors, advocates, ambassadors),

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Document No: **POL-003-2** Version **v1** Document Title: **Child Safeguarding Policy**

trustees, members, staff in consulting and partnership agencies, and any other individuals or groups that have been brought in contact with children (including their personal information and images) while working with and / or supporting Compass.

Partners refer to local, state, national, regional and international agencies that Compass has an official arrangement with via signed MoU or Partnership Agreement or Contract, to implement or deliver Compass Programs, Projects and Initiative in Australia and any part of the world.

5. Guiding Principles

Compass believes that all children have the right to be safe at all times. It recognises its duty of care to take all reasonable steps to ensure that children are safe from harm. Compass will proactively work to provide safe and protective programs, activities and environments

The protection of children is the responsibility of all Compass Directors, Committee Members, Workers, Associates and Partners carrying out national and international business activities on behalf of - Compass. Compass will ensure that all Workers and relevant stakeholders are made aware of Compass Child Safeguarding Policy and their responsibilities.

Where possible, children will be consulted in the development of this policy and the implementation of child safe practices. Children in our programs should be given opportunities to express their views on matters affecting them.

6. Context

Child abuse is a global problem that affects both boys and girls. It has existed since the beginning of time and is deeply rooted in cultural, economic and social practices. Children are abused physically, sexually, emotionally and through neglect.

Some children are more vulnerable to abuse and exploitation than others. Children living in extreme poverty, children with disabilities, children from minority groups, children living in residential care, children living in emergency or conflict situations, children on the move and children who are homeless or living with others who are homeless are often at higher risk of abuse than others.

Around the world children are forced to endure the most hazardous forms of child labour, girls are subjected to early enforced marriage, children are kidnapped and forced into armed conflict as soldiers or sexually exploited by combatants. Children are trafficked into commercial sexual exploitation (including online) and experience severe corporal punishment in schools.

While most child abuse occurs within families and communities, children also experience abuse and exploitation in organisations which provide them with support and services.

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Document No: **POL-003-2** Version **v1** Document Title: **Child Safeguarding Policy**

Compass works with some of the most vulnerable of the world's children. The nature of our work means we are potentially at risk of being targeted by people whom seek access to vulnerable children through our programs.

7. Compass Code of Conduct

Compass Code of Conduct Policy (POL-028-04) is a clear organisational guide of what is acceptable and unacceptable behaviours in relation to working with each other, our clients, suppliers, partners and primary & major stakeholders as well as working with Children and young people. It provides common understanding of the standard of behaviour and the appropriate boundaries expected of Compass' Personnel, Associates and Partners to keep children safe.

The Compass Code of Conduct is provided to all Compass Directors, Committee Members and Workers and signed by them regardless of their contact with children. It is also incorporated in Compass' MoU, Partnership Agreement and Contracts with partnering government & non-government organisations and local community groups.

Compass Code of Conduct is attached as **Appendix 1** of this Policy.

8. Risk Assessment

Risk management is an ongoing part of our work involving and affecting children. In order to provide safe activities, programs, projects and environments for children, Compass conducts a child protection risk assessment on all activities, programs, projects and initiatives, involving and affecting children either directly or indirectly, prior to commencement. Mitigation strategies are put in place for any risk identified and these (and any emerging risks) are actively monitored throughout the activity, program, project and initiative cycle.

Workers and associates (as relevant) are trained in child safeguarding and risk assessment. They are expected to be continually aware of potential risks to children as well as to be actively minimising opportunities and situations where children can be harmed.

Compass uses child friendly methods to involve children in helping us to identify potential risks to their safety when they are participating in or affected by our work.

Child safeguarding is included in our organisational Risk Register which is monitored by Compass' Group Executives and the Board's Audit, Risk & Compliance Committee.

9. Overview of Communication and Use of Children's Images Guideline

Compass is committed to promoting and respecting the right of children to integrity, privacy and confidentiality and safety and to ensure a child safe environment. This commitment is extended to the communication and use of children's information and images by Compass.

Compass' Communication and Use of children's Information and Images Guideline is attached as **Appendix 2**.

10. Worker Recruitment and Selection & Training

Compass is committed to child safe recruitment, selection and screening practices and to educating Workers, Associates and Partners, in child protection, in assessing, mitigating and preventing risks and creating child safe environments.

Compass will not knowingly engage, directly or indirectly, anyone who poses a risk to children. These practices aim to recruit the safest and most suitable people to work in our programs.

Compass will promote child safe practices that keep children safe in the organisation and in their own community and provide information about child protection to the children and communities in which we work. This information will include reporting child abuse if they have concerns about a Compass Worker, Associate or Partner or another representative in the organisation.

Our child safe practices including educating and training Workers are clearly stated in the Compass' Worker Recruitment and Selection (Workers working directly or in contact with children) Guideline. Refer to **Appendix 3**.

11. Working with Partners

Compass is committed to ensuring that any implementing partner is a child safe organisation by including Partners in the Scope of Compass' Child Safeguarding Policy and incorporating Compass Child Safeguarding Policy and Compass Code of Conduct (including children safe guard) in all MoUs, Partnership Agreements and Contracts and ensuring that our Partners -have effective CSP and practices in place to ensure child safety and Child Safe environment.

Our practices to ensure our implementing partner is a child safe organisation are clearly stated in the Compass' Working with Partners (Child Safe Guarding) Guideline. Refer to **Appendix 4**.

12. Responding to and reporting child protection concerns

Compass considers the abuse and exploitation of children to be completely unacceptable and is committed to ensuring that Workers and Associates are aware of their legal and moral responsibilities to report suspected child abuse within and outside of the organisation.

It is mandatory for all Compass' Workers, Associates and Partners to report any witnessed, suspected or alleged incidents of child exploitation or abuse or any breach of this policy and / or Compass Code of Conduct.

These concerns may relate to a child or Worker involved in the organisation or a concern about a child or person/s outside of the organisation's programs.

Compass is committed to implementing a reporting process which is clear, truthful, fair and professional. Compass will take all concerns and reports of child abuse seriously and act on these reports immediately.

Compass Child Abuse Reporting Procedure identifies:

- What to report
- When to report
- Who to report to
- How to report
- What will happen next

The Compass Child Abuse Reporting Procedure is attached as **Appendix 5**.

13. Responding to disclosure by a child.

Compass has in place a child-friendly complaint handling process that include access to support from appropriate children support agencies and/or a person who has received training in working with children or equivalent. Refer to Compass' - Compliant Child Handling Guidelines and Procedure for information about this process.

14. Mandatory reporting in NSW

In NSW, mandatory reporting is regulated by the Children and Young Persons (Care and Protection) Act 1998. Mandatory Reporters include people who deliver residential services therefore Compass is registered as a Mandatory Reporter with the NSW government and Compass Workers must lodge a mandatory eReport via the ChildStory 'Reporter Community' website maintained by the NSW government. Employees are to login -to the Reporter Community via the login button on the page at the link below and complete the mandatory reporting guide (MRG) following the instructions on this page and submit the eReport.

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Document No: *POL-003-2* Version *v1* Document Title: *Child Safeguarding Policy*

Use the following link to access the Reporter Community webpage:

[Lodging an eReport via NSW Government ChildStory Reporter Community](#)

15. Policy Review and Audit

It is very important - that Compass' Child Safeguarding Policy is a relevant and current document. It is also extremely important to monitor and assess the effectiveness of our policy implementation.

Compass' Group Chief Governance Officer (GCGO) will ensure this policy is reviewed at least SGP every two years. The review will include consultations with Compass' Workers, Associates, Partners and Primary stakeholders such as, children and young people, as well as other stakeholders. Any change made to the Policy will be reviewed by Compass Group Executive Management and approved by the Group Managing Director.

In addition, Compass undertakes an annual self-audit of the Compass Child Safeguarding Policy implementation across Compass operations as well as its Partners, in order to review adherence to our child safeguarding policies and standards.

Procedure:

Compass GCGO will review this policy on a regular basis, at least every two years.

Confirmation of internal compliance with this policy will be undertaken at least once annually.

Introduction of the policy will be included in the induction process, to be read by all new employees and volunteers.

Refresher training will be regularly organised to present the policy to Workers and keep them updated on any changes.

16. Legislation and Compliance

Compass complies with legislative requirements for mandatory reporting, as it relates to our organisation:

In NSW, Compass is a mandatory reporter and mandatory reporting is regulated by the Children and Young Persons (Care and Protection) Act 1998 (the Care Act).

In Queensland, mandatory reporting is regulated by the Child Protection Act 1999 and whilst Compass is not a mandatory reporter under Queensland legislation Compass Workers are expected to report any concerns to their immediate Supervisor where "they form a reasonable suspicion that a child has suffered, is suffering or is at an unacceptable risk of suffering significant

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Document No: **POL-003-2** Version **v1** Document Title: **Child Safeguarding Policy**

harm caused by physical or sexual abuse and may not have a parent able and willing to protect them.”.

In New Zealand, the Children’s Act 2014 regulated protecting and improving the lives of vulnerable children and organisations receiving government funding and providing services linked to child safety have an obligation to have a child protection policy and take steps to prevent child abuse and ensure the safety and wellbeing of children.

17. Related documents and resources

The following related documents are to be read in conjunction with this policy:

- Compass’ Code of Conduct;
- Human Resources Manual
- Complaint Handling Policy
- Privacy Policy

18. Responsibilities

All Compass workers have an obligation to:

- familiarise themselves with and ensure they have a clear understanding of Compass policies and procedures,
- observe and implement such policies, and associated procedures in delivering services to Compass clients,
- inform Compass clients of the impact of this policy on them and assist them to understand their rights and obligations, as required,
- identify issues that require amendment to this policy document and complete the relevant documentation to propose any amendments, and
- report breaches of Compass policies or procedures.

The relevant Group Executive Manager is ultimately responsible to:

- ensure all stakeholders within their area of responsibility are informed about Compass Policies and Procedures,
- ensure appropriate processes and controls are implemented to enable the correct application of and adherence to relevant policies and procedures, and
- ensure appropriate processes and controls are implemented to enable breaches of approved Compass Policy and Procedures to be reported and managed.

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Document No: *POL-003-2* Version *v1* Document Title: *Child Safeguarding Policy*

19. Document Control

This policy is part of Compass approved policies and procedures register.

Policies and procedures on the register are reviewed regularly and revised where warranted.

The Group Chief Governance officer is ultimately responsible for the control and review of policy and procedure documents in accordance with Compass’ Group Documentation Structure and Quality Assurance (“QA”) Management Procedure.

Refer to Compass Policy and Procedure Development Approval and Review (PROC-011) for information on the document review process.

20. Records

All records relevant to these procedures are to be maintained in a recognised Compass recordkeeping system in accordance with Compass Records Management Policy.

21. Definitions

Term	Definition
Compass	Compass Housing Services Co. Ltd
Compass Group	<p>means the corporate structure that includes Compass (as the parent company) and the boards of Subsidiary Companies, Committees and Advisory Groups as created from time to time. Currently these are:</p> <ul style="list-style-type: none"> • Compass Housing Services (New Zealand) Co Ltd subsidiary board, • Compass Housing Services (Queensland) Co Ltd subsidiary board, • the Audit, Risk and Compliance (ARC) Committee, • the Governance and Remuneration (GREM) Committee, • the Australian Services Committee, • the Internal Review Committee, • the International Expansion Committee, and • the Community Tenancy Involvement Panel (an Advisory Group) <p>means a committee established by resolution of and reporting to the Parent Board in accordance with Compass Constitution Clause 6 (specifically 6.1, 6.8 – 6.16).</p>
Committee	means a committee established by resolution of and reporting to the Parent Board in accordance with Compass Constitution Clause 6 (specifically 6.1, 6.8 – 6.16).
Committee member	means a member of a Committee as defined in this Policy.
Director	<p>Has the same meaning as defined in the Corporations Act 2001 Part 1.2 Division 1 Section 9 Dictionary in Australia and as defined in the Companies Act 1992 Part 1 Section 2 Interpretation in New Zealand.</p> <p>Means a person appointed by the members of Compass (or appointed by the Parent Board under the Constitution to fill a vacant position) as a director to the Parent Board.</p>

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Document No: *POL-003-2* Version *v1* Document Title: *Child Safeguarding Policy*

Term	Definition
Worker (Compass)	<p>has the same meaning as defined in the NSW Work Health and Safety Act 2011 No 10 Subdivision 2 Part 7 Meaning of ‘worker’ (1) A person is a worker if the person carries out work in any capacity for a person conducting a business or undertaking, including work as:</p> <ul style="list-style-type: none"> a) an employee, or b) a contractor or subcontractor, or c) an employee of a contractor or subcontractor, or d) an employee of a labour hire company who has been assigned to work in the person’s business or undertaking, or e) an outworker, or f) an apprentice or trainee, or g) a student gaining work experience, or h) a volunteer, or i) a person of a prescribed class. <p>For clarity directors, committee and advisory group members are listed separate from workers in this document.</p>

22. Document Information

Document Number	POL-003-2
Document Administration:	Governance and Compliance Business Unit companydocuments@compasshousing.org
Responsible Business Unit	Research and International
Responsible Officer	Ben Wong, Manager International and Stakeholder Relations
Approval Authority:	Group Managing Director
Version:	v1
Original issue date:	22/02/2019
Last reviewed date:	22/02/2019
Current version approval date:	17/06/2019
Next review no later than	30/06/2022

23. Version Administration

Version	Date	Status and Changes	Author
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Document No: **POL-003-2** Version **v1** Document Title: **Child Safeguarding Policy**

0.1	22/02/2019	Policy creation	Ben Wong, Manager International and Stakeholder Manager
0.2	24/02/2019	Review, format and comment – added requirements for NSW mandatory reporting	Julie Barnett, Compass Group Chief Governance Officer
1.0	28/02/2019	Approved for release as working draft pending Board approval	Greg Budworth, Group Managing Director
	17/06/2019	The Board RESOLVED to approve POL-003-02 Child Safeguarding Policy v1 (WD-28032019)	Compass Parent Board

24. Appendices

[Appendix 1 Compass Code of Conduct Policy \(POL-028-4\)](#)

[Appendix II Compass' Communication of Children's Information and Images Guideline](#)

[Appendix III Compass' Worker Recruitment and Selection](#)

[Appendix IV Compass' Working with Partners \(Child Safeguarding\) Guideline](#)

[Appendix V Compass' Child Abuse Reporting Procedure \(PROC-012-04\)](#)

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Document No: *POL-003-2* Version *v1* Document Title: *Child Safeguarding Policy*

Appendix 1 Compass Code of Conduct Policy (POL-028-4)

1. Introduction

This Code of Conduct Policy (the **Code**) applies to all workers, directors and members of governance committees and advisory panels of the Compass Group.

The object of the Code is to provide a framework for conducting business and interacting with clients, colleagues, stakeholders and others which is to:

- a) act with the utmost integrity, honesty, transparency and professionalism and be scrupulous in the proper use of Compass Group information, funds, equipment and facilities; and
- b) exercise objectivity, fairness, equality, proper courtesy, consideration and sensitivity in dealing with clients, colleagues and other stakeholders; and
- c) identify and manage any conflicts of interest appropriately; and
- d) promote the safety and well-being of all children accessing its services and programs, in particular to minimise the risk of abuse of children; and
- e) respect individual rights to freedom of expression, self-determination and decision-making to exercise choice and control over their own lives: and
- f) prevent and respond to all forms of violence against, and exploitation, neglect and abuse of people with disability and vulnerable people.

All workers, directors and members of governance committees and advisory panels of the Compass Group are required to:

- a) represent the Compass Group's 'best interests' and value the Compass Groups' reputation;
- b) demonstrate conduct and behaviour that reflects the Compass Group's values: honesty and integrity;
- c) treat others with respect and value individual differences;
- d) use appropriate language which does not discriminate, upset or offend others;
- e) perform their duties with skill, care and diligence;
- f) maintain a safe working environment and report anything which could be unsafe;
- g) report any instance where the Code may be breached;
- h) ensure a child safe environment is maintained and protect children from all harms and abuses;
- i) act to prevent violence, neglect, exploitation or abuse of vulnerable persons including children and people with a disability;
- j) respect and maintain privacy and confidentiality; and

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Document No: **POL-003-2** Version **v1** Document Title: **Child Safeguarding Policy**

- k) use any delegated authority in a fair and equitable manner.

The Code may apply when a worker, director or member of a governance committee or advisory panel is performing duties or engaging in behaviour outside of the usual workplace location or their usual working hours for example whilst attending meetings and conferences or engaging with the community as a representative of the Compass Group.

2. Guiding Principals

2.1. The interests of the Compass Group

Each worker, director or member of a governance committee or advisory panel has the ability, through their conduct and behaviour, to either enhance and maintain or harm and undermine the trusted and respected reputation of the Compass Group.

The expectation is that each worker, director or member of a governance committee or advisory panel:

- a) acts professionally and ethically;
- b) undertakes his or her duties with diligence and care;
- c) is accountable for the decisions he or she makes and the actions he or she takes;
- d) deals fairly and equitably with others;
- e) provides advice which is within the delegation of his or her role and for which he or she is authorised to provide;
- f) helps protect clients and other stakeholders against potential fraud, theft;
- g) helps protect vulnerable persons including children and people with disability against discrimination, violence, exploitation, neglect and abuse;
- h) never entertains clients or stakeholders or participates in activities or functions in a way which may damage Compass' reputation; and
- i) uses organisational equipment and systems of work appropriately, for their proper purpose and in accordance with the relevant policies and procedures.

Further, in providing supports or services to people with disability, each worker, director, or member of a governance committee or advisory panel must comply with the requirements of the NDIS Code of Conduct and:

- a) act with respect for individual rights to freedom of expression, self-determination and decision-making in accordance with applicable laws and conventions;
- b) respect the privacy of people with disability;
- c) provide supports and services in a safe and competent manner, with care and skill;
- d) act with integrity, honesty and transparency;

- e) promptly take steps to raise and act on concerns about matters that may impact the quality and safety of supports and services provided to people with disability;
- f) take all reasonable steps to prevent and respond to all forms of violence against, and exploitation, neglect and abuse of, people with disability;
- g) take all reasonable steps to prevent and respond to sexual misconduct.

For further information, please refer to the following Compass documents:

- POL-003-2 Child Safeguarding Policy
- POL-003-3 People with Disability Safeguarding Policy
- POL-006-1 Social Media Policy
- POL-038 ICT Electronic Messaging Policy
- POL-039 ICT Mobile Device Policy
- POL-041 ICT Use Policy
- POL-028 Workplace Relations Policy Manual

2.2. The key values – honesty and integrity

The values of the Compass Group, as noted in the Strategic Plan 2017 – 2020, underpin operations. It is recognised that the continued success of the Compass Group depends on each worker, director or member of a governance committee or advisory panel demonstrating, in particular, the values of honesty and integrity and thereby:

- a) use Compass assets and funds (including corporate credit cards) for proper use in accordance with relevant policies and procedures;
- b) keep true and accurate records of all transactions (including receipts) which make use of Compass funds;
- c) never amend records with the intention of disguising, concealing or misrepresenting the true nature of the transaction or the involvement with a third party;
- d) ensure all transactions undertaken during your work are properly recorded;
- e) never assist a third party to break or evade the law;
- f) avoid any personal, financial or other interest which may conflict with their employment and duties; and
- g) immediately report any suspicions of fraud, theft or dishonesty.

For further information, please refer to the following Compass documents:

Corporate Governance Policies including:

- POL-005-1 Protection of Government Investment Policy
- POL-005-2 Conflict of Interest Policy
- POL-005-3 Whistleblower Policy

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Document No: **POL-003-2** Version **v1** Document Title: **Child Safeguarding Policy**

- POL-005-4 Fraud and Corruption Policy
- POL-014 Intellectual Property Policy
- POL-021 Reportable Gifts Policy

Organisational Management Policies including:

- POL-018-3 Petty Cash Policy
- POL-018-4 Credit Card Policy
- POL-018-7 Motor Vehicle Policy
- POL-044 Corporate Asset Purchase and Procurement Policy
- POL-046 Delegation of Authority Policy
- POL - 046 Delegations and Authorities Schedule

2.3. Respect and Dignity

Compass values difference and supports the development of a diverse and inclusive workforce and governance practice where respect and dignity oversee all interactions.

Discrimination, bullying, harassment or offensive behaviour of any kind will not be tolerated.

Each worker, director or member of a governance committee or advisory panel agrees to:

- a) makes decisions that are based on merit, in accordance with policy, procedure and their delegated authority;
- b) treat colleagues, clients, stakeholders and other parties with respect and empathy;
- c) support people with disability to make informed decisions to exercise choice and control over their lives:
- d) report criminal, inappropriate or offensive behaviour, abuse of children and people with a disability; and
- e) respect and support fundamental human rights¹

For further information, please refer to the following Compass documents:

- POL-003-2 Child Safeguarding Policy
- POL-003-3 People with Disability Safeguarding Policy
- POL-028 Workplace Relations Policy Manual
- POL -027 Work Health and Safety Management System
- POL-046 Delegation of Authority Policy

2.4. Conflicts of Interest

¹ As set out in the [UN Universal Declaration of Human Rights](#).

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Document No: *POL-003-2* Version *v1* Document Title: *Child Safeguarding Policy*

Acting honestly and with integrity requires each of us to manage conflicts of interest and avoid placing personal interests or the interests of another person before those of the Compass Group, our clients or other stakeholders.

The perception of a conflict of interest can do as much damage to the reputation of the Compass Group as an actual conflict of interest. All workers, directors and members of a governance committee or advisory panel must be conscious of when and how a conflict may be perceived by others and take appropriate and immediate action to either avoid or address this risk.

Any interest which may constitute a conflict of interest must be promptly disclosed in accordance with the Conflict of Interest Policy and recorded in Compass' online Tickit system.

For further information, please refer to the following Compass documents:

- POL-005-2 Conflict of Interest Policy
- POL-046 Delegation of Authority Policy
- POL - 046 Delegations and Authorities Schedule

2.5. Safety

All workers, directors, and members of a governance committee or advisory panel are:

- a) prohibited from possessing or consuming alcohol and/or illegal drugs in the workplace and are prohibited from working under the influence of illegal drugs or alcohol.
- b) expected to perform their duties within the guidelines of Compass Work Health and Safety policies and procedures and will do all that is reasonably practicable to ensure their safety and the safety of others.
- c) report any concern about neglect, exploitation, abuse or other concern for the safety or well-being of children and people with a disability.

For further information, please refer to the following Compass documents:

- POL-003-2 Child Safeguarding Policy
- POL-003-3 People with Disability Safeguarding Policy
- POL-027 Work Health and Safety Policy and Management System
- POL-022 Return to Work Policy and Procedure

2.6. Privacy and Confidentiality

All workers, directors and members of a governance committee or advisory panel may come across private and confidential information relating to Compass, colleagues, tenants, clients, suppliers or third parties.

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Document No: **POL-003-2** Version **v1** Document Title: **Child Safeguarding Policy**

All workers, directors and members of a governance committee or advisory panel must use any private or confidential information provided to them in line with the relevant Privacy and Confidentiality laws.

Misuse of confidential and private information can have severe commercial and reputational consequences for the Compass Group and can also negatively impact those whose information is misused.

Each worker, director and member of a governance committee or advisory panel must:

- a) ensure information is secure and not share private or confidential information with colleagues unless they need it to perform their duties and their delegation allows them access to this information;
- b) only release information to third parties if the client (or person affected by the release of the information) has agreed in writing to the information being release or if required under the law;
- c) follow privacy procedures and requirement to protect information whenever personal details are supplied over the phone, by email or fax;
- d) follow all IT protocols and procedures for the maintenance of passwords and user profile setup;
- e) collect, use store, handle, update and destroy information, particularly personally identifiable information, in line with applicable policies and processes;
- f) never disclose any information about the Compass Group or any individual which is not already in the public domain without the proper authority to do so;
- g) never post inappropriate, false or malicious comments or materials online relating to the Compass Group.

For further information, please refer to the following Compass documents:

- POL-006-1 Social Media Policy
- POL-019 Privacy Policy
- POL-041 ICT Use Policy

2.7. Standards of dress

All workers, directors and members of a governance committee or advisory panel must dress in a manner that upholds the professional image of the Compass Group and, where required, in an appropriate manner to ensure their work health and safety.

For further information, please refer to the following Compass documents:

- POL-028-13 Corporate Uniform Policy

2.8. How the Compass Group ensures compliance with the Code

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Document No: *POL-003-2* Version *v1* Document Title: *Child Safeguarding Policy*

This Code sets the minimum expectations regarding the conduct and behaviour of each worker, director and member of a governance committee or advisory panel with the understanding that no policy can cover every conceivable circumstance.

If a worker, director and member of a governance committee or advisory panel has doubts about any aspect of this Code, including whether his or her conduct or the conduct of someone else is consistent with the Code, her or she may seek clarification from:

- a) their manager or a human resource representative if he or she is a worker of the Compass Group; or
- b) the Company Secretary or the Chair of the Parent Board if her or she is a director or member of a governance committee and advisory panel of the Compass Group.

2.9. Breaches of the Code

All workers, directors and members of a governance committee or advisory panel have a duty to observe the Code and ensure that no breaches occur. Any breach of the Code requires immediate attention. All workers, directors and members of a governance committee or advisory panel have a duty to report known or suspected breaches of the Code.

A complaint or disclosure about an alleged breach of the Code should be in writing and contain details about the date, time and nature of the alleged breach and include any available support material. All reports are to be lodged via Tickit using the Misconduct – Compass Worker or Suspected Fraud category and reports will be treated sensitively and impartially. The principles of procedural fairness and natural justice will be observed in any action taken in relation to the complaint or disclosure.

The Compass Group will protect any “Whistleblower” who reports a violation in good faith and on reasonable grounds and will comply with laws relating to “Whistleblower protection”.

The allegation should be made to:

- the worker’s manager or a human resource representative if he or she is a worker of the Compass Group; or
- the Company Secretary or the Chair of the Parent Board if her or she is a director or member of a governance committee and advisory panel of the Compass Group.

The complainant will be informed of the procedure for and outcome of the investigation. All workers, directors and members of a governance committee or advisory panel are provided access to EAP services free of charge.

Any worker, director and member of a governance committee or advisory panel may at any time discuss a matter or seek advice on how to proceed with a matter from a human resources

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Document No: **POL-003-2** Version **v1** Document Title: **Child Safeguarding Policy**

representative, any other senior executive, the Chair of the Parent Board or the Company Secretary.

For further information, please refer to the following Compass documents:

- POL-005-3 Whistleblower Policy
- POL-005-4 Fraud and Corruption Policy
- POL – 028 Workplace Relations Policy Manual

3. How Does Compass Ensure the Code Remains Effective?

The Human Resources department is responsible for the ongoing review and development of the Code.

On the commencement of employment, contractual service or appointment and then annually thereafter, each worker, director and member of a governance committee or advisory panel must review the Code and declare that they:

1. understand the principles of the Code;
2. have complied with the principles of the Code in the previous 12 months; and
3. agree to continue to comply with them.

4. Declaration

It is a requirement that any breach of the Code will be recorded and reported in line with Compass' policies and procedures.

I have read, understood and will comply with Compass Housing Service Co Ltd and Compass Group Code of Conduct Policy.

Signed: _____ Date: _____

Print Name: _____ Position: _____

Appendix 2 Compass' Communication of Children's Information and Images Guideline

Compass will at all times portray children in a respectful, appropriate and consensual way. A child should always be portrayed in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.

Informed consent must always be sought and documented for the use of a child's story or image. When asking for consent, details should be given as to how, where and for how long the story, information and /or image will be used. We will provide examples of how the story/information and/or image will be used. We will explain how we cannot control the use of images once they are loaded onto the internet and that they can be viewed by anyone with internet access at any time.

There should be no identifying information of the child used in the publication of images. This includes the child's family name, community or school name.

Children should not be portrayed in isolation; instead, they should be portrayed as part of their community.

Local/community cultural traditions should be assessed regarding restrictions for reproducing personal images.

Images should be an honest representation of the context and the facts. When sending images electronically, file labels should not reveal identifying information.

All photographers will be screened for their suitability, including police checks where appropriate.

A risk assessment (with the child and their family) will be undertaken prior to the publishing of any information/story about an especially vulnerable child.

A story about an especially vulnerable child will not show their face or any other identifying factors.

Children should not be portrayed as weak, isolated and vulnerable. Images of children should portray them as resilient human beings and as partners in the development process.

All images and information about children will be stored safely and will only be accessed by authorised personnel.

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Document No: *POL-003-2* Version *v1* Document Title: *Child Safeguarding Policy*

Appendix 3 Compass' Worker Recruitment and Selection (Workers working directly or in contact with children) Guideline.

Compass is committed to child safe recruitment, selection and screening practices. We will not knowingly engage – directly or indirectly – anyone who poses a risk to children. These practices aim to recruit the safest and most suitable people to work in our programs. Our child safe practices include:

Promoting our child safe commitment on our website, in other promotional materials and in all job advertisements.

All applicants will receive a copy of Compass' Child Safe Guarding Policy and be informed of the screening requirements when they are sent the application form.

Applicants will be required to submit a detailed application form when applying for a position. This form will ask for extensive information about the applicant's background such as dates and places of employment, education and other activities.

Position descriptions are required for all positions (employees, volunteers, consultants short/long term etc), which describe key selection criteria and outline tasks and accountabilities.

All positions will be assessed for the level for risk in relation to contact with children. Contact with children is defined as "Working on an activity or in a position that involves or may involve contact with children, either under the position description or due to the nature of the work environment". Working with children is defined as being engaged in an activity with a child where the contact would reasonably be expected as a normal part of the activity and the contact is not incidental to the activity. Working includes volunteering or other unpaid works.

Positions which work with children will require the highest level of screening and the applicant must possess relevant qualifications and experience in working with children.

Recruitment screening processes for all workers in contact with children will include criminal record checks before engagement (statutory declarations or local legal equivalent where criminal record checks are unavailable or unreliable). These include documented criminal record checks for Workers conducted for each country in which the individual has lived for 12 months or longer over the last 5 years, and for the individual's countries of citizenship.

Where the candidate is working directly with children in Australia, they may require a Working with Children Check (depending on the jurisdiction).

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Document No: *POL-003-2* Version *v1* Document Title: *Child Safeguarding Policy*

Recruitment screening processes for all Employees working with children will include the additional screening measure of being asked behavioural-based interview questions. Behavioural-based questions will be used to ask for examples of the candidate's past behaviour and experiences. In positions working directly - with children, the panel will explore the candidate's motivations for working with children, which will include value-based questions seeking information about the candidate's attitudes to children, professional boundaries, accountability, team work and how they have responded to concerns about children and other ethical dilemmas.

A minimum of two verbal referee checks will be required for all preferred candidates in positions that have contact with children. This would include short- and long-term positions, volunteers on placement and consultants. The candidate's most recent employer/supervisor must be one of these referees. Compass will verify the identity of the referee and make direct contact with each of these referees. Written references will not be accepted. Compass reserves the right to request additional references.

All staff will be required to provide proof of identify including birth certificate, passport, drivers licence and relevant qualifications. Original documents are required.

All positions will be subject to a probationary period depending on the length of the contract.

Compass' Workers, Associates, Partners and project visitors will be required to read and acknowledge Compass Child Safeguarding Policy and read and sign Compass' Code of Conduct.

Compass reserves the right to refuse employment or terminate any person's employment that may pose a risk to children. Employment contracts will contain provisions for the prevention of a person working with children if they present an unacceptable risk to children. This may include suspension or transfer to other duties for any employee who is under investigation and provisions to dismiss any employee after an investigation or who breaches the Compass' Code of Conduct Policy.

Compass Workers will be required to participate in child protection training as part of their induction, in annual refresher training and targeted training depending on their role or contact with children.

Staff with specialist child safeguarding responsibilities will be supported to attend child safeguarding training delivered externally to stay informed of current practice.

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Document No: *POL-003-2* Version *v1* Document Title: *Child Safeguarding Policy*

All media visiting the field will be expected to undergo a child safeguarding briefing prior to their visit to Compass' facilitated programs.

Compass commits to undertake capacity building and training in child safeguarding with all development partners who work with us to implement programs that involve or affect children.

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Document No: *POL-003-2* Version *v1* Document Title: *Child Safeguarding Policy*

Appendix 4 Compass' Working with Partners (Child Safeguarding) Guideline

Compass determines a partners' status as a child safe organisation by including child safeguarding in our partner appraisal process

Compass ensures that its Partners have effective child safeguarding policies and practices in place to ensure child safety in the organisation and their activity, program, project and initiative/s.

Compass commits to strengthening our Partners' ability to protect children in their activity, programs, project and Initiative/s by investing in targeted capacity building, training and awareness raising on child safeguarding.

Compass includes a budget line for capacity building of Partners in all program, project and initiative/s budgets (if deemed necessary by the Partner appraisal).

Where a partner does not have their own Child Safeguarding Policy, Code of Conduct and procedures in place, Compass works with them to develop their own documents in line with global /donor/sector minimum standards including the ACFID Code of Conduct and Compass' Child Safeguarding Policy and Code of Conduct.

Compass actively monitors the implementation of agreed child safeguarding measures and external compliance obligations with our partners on an ongoing basis via project reports, project visits and annual audits.

Compass works with its Partners to undertake a child protection risk assessment for all activities, programs, project and initiatives involving or affecting children, this is monitored throughout the life of the program, project and initiative/s cycle.

Compass has an agreed reporting mechanism in place with Partners for concerns regarding child abuse or a breach of the Compass Child Safeguarding Policy.

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Document No: *POL-003-2* Version *v1* Document Title: *Child Safeguarding Policy*

Appendix 5 Compass' Child Abuse Reporting Procedure (PROC-012-04)

General statements

Compass will treat all concerns raised seriously and ensure that all parties will be treated fairly and in accordance with the principles of natural justice.

All reports will be handled professionally, confidentially and expediently. All reports made in good faith will be viewed as being made in the best interests of the child regardless of the outcomes of any investigation. Compass will act on these reports immediately.

Compass will ensure that the interests of anyone reporting child abuse in good faith are protected.

The rights and welfare of the child is of prime importance. Every effort will be made to protect the rights and safety of the child throughout the investigation.

Children and community members with whom Compass works will be provided with information about how to report any child protection concerns about Compass' Workers, Associates and Partners.

It is mandatory for all Compass' Workers, Associates and Partners to report any witnessed, suspected or alleged incidents of child exploitation or abuse or any breach of the Compass Child Safeguarding Policy and / or Code of Conduct.

These concerns may relate to a child or a Worker involved in the organisation or a concern about a child or person/s outside of the organisation's programs.

If you do have a concern you should immediately follow Compass' child abuse reporting procedures listed below.

We will take all concerns and reports of child abuse seriously and act on these reports immediately.

The Child Abuse Reporting Procedure

Who should report?

All Compass' Directors, Committee members, Workers, Associates and Partners including people in the community and partner organisations.

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Document No: *POL-003-2* Version *v1* Document Title: *Child Safeguarding Policy*

What should be reported?

Any disclosure, concern or allegation from a child, community member, Worker or Associate regarding the safety, abuse or exploitation of a child (this includes actual, suspected, or risk of abuse or harm to a child) Any observation or concerning behaviour exhibited by a Compass' staff, volunteer or other associate that breaches Compass' Code of Conduct (Working with Children).

When to report?

Child abuse concerns should be raised immediately. Compass workers and associates should report to their immediate Supervisor and lodge an incident report using Compass Tickit online incident and risk reporting tool within 24 hours (or the next business day) after reporting their concerns to their Supervisor. Supervisors are responsible for informing the Group Executive Manager.

Who to report to?

In Australia: Child abuse reports should be made to their immediate Supervisor and the Group Chief Operating Officer (GCOO). The GCOO is responsible for informing the Group Managing Director (GMD). The Group Chief Governance Officer (GCGO) is delegated responsibility for administering Compass Tickit online incident and risk reporting system and will liaise with the GCOO and the GMD to ensure immediate actions are taken to protect the child/ren and that all allegations of child abuse are fully investigated and promptly responded to.

In NSW: Mandatory reporting is the legislative requirement for selected classes of people to report suspected child abuse and neglect to government authorities. Compass is a registered Mandatory Reporter and Compass Workers must lodge an eReport to the NSW Governments ChildStory Reporter Community. Use the following link to access the Reporter Community webpage:

[Lodging an eReport via NSW Government ChildStory Reporter Community](#)

Overseas: Child abuse reports should be made to the line manager or Country Manager. If this is not possible reports can be made directly to the Group Chief Governance Officer, the Executive Assistant to the Group Managing Director or the Group Managing Director by telephone to +61 2 49202600 or by email to governance@compasshousing.org. If you are unable to contact any of these people, please provide non-sensitive information to Compass Head office reception staff who will take responsibility for contacting the relevant person as soon as possible.

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Document No: [POL-003-2](#) Version [v1](#) Document Title: [Child Safeguarding Policy](#)

How should it be reported?

Verbally and by completing Compass' Child Abuse Incident Reporting Form using Compass Tickit online incident and risk reporting tool. A link to Tickit Incident reporting forms is available on Compass website and for Workers from the Homepage of Compass SharePoint intranet site.

What will happen next?

Compass GCOO, GCGO or Country Director in consultation the GMD will discuss the allegations and then decide upon the next step. This will involve one or more of the following:

- Interviewing the person/persons who made the allegations and/or other witnesses to gather more information with which to decide about the allegation,
- Reporting to local police and or child protection authority when it is suspected or becomes clear that a crime has been committed,
- Reporting to the Australian Federal Police when it is suspected or becomes clear that a crime has been committed regarding child sex tourism, child sex trafficking and child pornography,
- Reporting to local child protection services as necessary,
- Handling the concern internally if it is not a criminal matter,
- Providing support to all stakeholders (including reporter) as necessary, and / or
- No further action may be taken where the allegations are unsubstantiated.

Refer to Compass Investigation Procedures for more information on the investigation process.

Confidentiality (as opposed to secrecy).

Confidentiality is a key principle of reporting and managing child protection concerns. All information regarding a child protection concern must only be shared with the designated Manager, Compass GCGO and / or Office of the GMD. The names of people involved, and the details of the report will remain confidential. Information will only be released on a "need to know" basis or when required by Australian or overseas law or when a report to police or child protection authorities is made.

Disciplinary action.

Disciplinary action will be taken against any Worker and Associate found to:

- Have failed to report a child protection concern,
- Have intentionally made a false allegation, or

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Document No: **POL-003-2** Version **v1** Document Title: **Child Safeguarding Policy**

- Have made a serious breach of Compass Child Protection Policy and/or Compass Code of Conduct Policy (minor breaches may result in action such as refresher training or increased supervision).

Disciplinary action may include the following sanctions:

- Compass Workers – disciplinary action, suspension, termination and / or referral to police.
- Compass Associates and Partners – up to and including termination of all relations including contractual and partnership agreements with Compass and / or referral to police.
- Where relevant, reporting to authorities / government agencies.

End of Document.

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