

Title: Safeguarding Children and Adults at Risk Policy



Division: All

Approved by: Executive Director Transformation and Improvement

Purpose

This Safeguarding Policy establishes the organisation's commitment to promoting and maintaining a safe, respectful and inclusive environment for children, young people and adults at risk. It outlines the organisation's expectations for preventing abuse, neglect, exploitation and harm, and for responding appropriately to safeguarding concerns.

This policy supports compliance with relevant legislation and safeguarding standards and affirms that safeguarding is a shared responsibility across the organisation. It is supported by the [Care Reimagined](#) and **Safeguarding Frameworks**, which provides the detailed governance arrangements, practices, procedures and guidance required to embed safeguarding in all aspects of the organisation's culture, services and decision-making.

Important: The Safeguarding Policy should be read in conjunction with all relevant Mercy Health policies, procedures and guidelines to ensure an appropriate and coordinated response to safeguarding concerns. This policy supports compliance with applicable legislative, regulatory and contractual obligations

Who Must Comply

This policy applies to all Mercy Health:

- board members
- employees (permanent, temporary and casual)
- volunteers
- students
- contractors and consultants
- any other persons engaged by, or acting on behalf of, Mercy Health.

Policy

Safeguarding Definition

At Mercy Health, Safeguarding means taking reasonable and proactive measures to protect the safety, dignity and human rights of every person in or connected to our care. We strive to support people throughout their lives to live as well as possible by delivering safe, person-centred care, services and by preventing harm, abuse, neglect, and exploitation.

Safeguarding Commitment

At Mercy Health, we are committed to creating safe, respectful and inclusive environments where every person is protected from harm, abuse, neglect and exploitation. Guided by our values, we foster a shared responsibility for safeguarding and support people to speak up, be heard and feel safe.

Safeguarding is embedded across our care, services and culture, with practices tailored to the needs and circumstances of children, young people and adults at risk across the lifespan.

For children and young people, safeguarding means taking proactive steps to protect them from abuse and harm, and supporting their safety, well-being, development and participation.

For adults at risk, safeguarding means upholding their right to live safely and free from abuse and neglect, while respecting their choices, wishes and lived experience.

We are committed to:

- Promoting safe, inclusive and culturally safe environments where people feel respected, valued and protected.
- Listening to and respecting the voices, rights, choices and lived experiences of those in our care.
- Responding to concerns, complaints and allegations in a timely, compassionate and appropriate manner.

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- Actively identifying and responding to indicators of abuse, neglect or exploitation and taking proactive steps to identify and address risks to people's safety, well-being and rights, even where concerns have not been explicitly raised.
- Working together with families, carers, communities and partners to strengthen safeguarding and well-being.
- Investing in education, training and capability development to ensure our safeguarding practices remain effective, responsive and aligned with best practice and meeting community expectations.
- Continuously improving our safeguarding practices to ensure they remain effective, responsive and person-centred.

Catholic Commitment to Safeguarding

As a Catholic ministry, Mercy Health is committed to upholding the inherent dignity, rights and well-being of every person. Guided by Catholic Social Teaching and the [National Catholic Safeguarding Standards](#), we foster a culture of safety, respect, inclusion and participation, where children and people at risk are protected from harm and empowered to have their voices heard. We recognise the equal worth of all people, promote self-determination and equity, and stand in solidarity with those who are vulnerable or marginalised. Through compassionate, person-centred care and accountable practice, we are committed to preventing abuse, responding effectively to safeguarding concerns, and continually strengthening safe environments for all.

1. Safeguarding Procedures

Mercy Health will maintain Safeguarding procedures that support the safety, rights and well-being of children and adults at risk. At a minimum, these procedures will:

- Define the responsibilities and expected conduct of employees, volunteers and contractors when working with children and vulnerable people.
- Promote and protect the rights, dignity, privacy, participation and autonomy of children and adults at risk, and minimise the risk of exploitation, abuse, neglect or harm.
- Support children and adults at risk to participate in decisions affecting their care and well-being, to the extent of their capacity and preferences.
- Require employees and volunteers to take reasonable measures to ensure their own safety and that of patients, residents, clients, children, adults at risk people and colleagues.
- Outline processes for responding to, escalating and reporting safeguarding concerns, including notification to police or other authorities where there is evidence or suspicion of criminal conduct.
- Provide clear pathways for disclosure, incident management, investigation, reporting and documentation.
- Ensure appropriate support is provided to children, adults at risk, families, guardians and others affected by safeguarding incidents.
- Define processes for communication with families, guardians, carers and advocates, taking into account the individual's circumstances, wishes, rights and vulnerability.
- Comply with relevant legislation, mandatory reporting obligations, regulatory requirements and recognised safeguarding standards.

2. Governance, Leadership and Culture

The Mercy Health Board and Executive team are accountable for overseeing the organisation's Safeguarding framework and ensuring appropriate systems, resources and governance are in place to support the safety and well-being of children and adults at risk.

Mercy Health recognises that safeguarding is everyone's responsibility. We are committed to fostering a culture where children and adults at risk are safe, respected, heard and protected from harm. Safeguarding is embedded across all services through shared accountability, leadership, education and continuous improvement. All workforce members are expected to understand and fulfil their safeguarding responsibilities and contribute to a safe, inclusive and person-centred environment.

The [Safeguarding Advisory Group and Family Violence and Safeguarding Working Group \(Health Services VIC only\)](#) provide advice, guidance and support to strengthen organisational capability and

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promote the integration of safeguarding and family violence practices across Mercy Health. These groups support a culture of safety, dignity, respect and empowerment and assist in embedding safeguarding into everyday practice.

The **Safeguarding Lead** is responsible for providing organisational oversight of safeguarding, including monitoring safeguarding risks, incidents, trends, legislative and regulatory compliance obligations, and organisational safeguarding performance. The Safeguarding Lead supports continuous improvement, provides assurance that safeguarding responsibilities are being effectively implemented across Mercy Health, and ensures timely reporting of safeguarding risks, incidents, emerging issues, trends and compliance matters to the Executive and Board through established governance processes. The Safeguarding Lead also supports organisational accountability by coordinating safeguarding reporting, monitoring the effectiveness of safeguarding controls, and overseeing the implementation of improvement actions arising from incidents, audits, reviews and recommendations.

Policies and procedures are reviewed regularly in accordance with Mercy Health's document review processes and may also be updated in response to changes in legislation, standards, best practice, incidents, complaints or organisational needs.

Roles and Responsibilities Safeguarding is embedded across Mercy Health through clear roles, accountability, and shared responsibility, supporting a consistent approach to preventing, identifying, responding to, and learning from safeguarding concerns. [Refer to Appendix A](#)

3. Recruitment and Induction

Recruitment documents reference Mercy Health's Safeguarding Commitment and affirm that Mercy Health is committed to safeguarding children and adults at risk. Mercy Health has zero tolerance for abuse, neglect, exploitation, or any form of harm towards children and adults at risk.

This includes:

- Job adverts reference safeguarding
- Interviews include safeguarding questions
- Screening checks: [Aged Care – NDIS Scheme Worker Screening Check Procedure](#), [Screening Policy \(including Police Record Check and Working with Children and Vulnerable People\)](#), [Working with Children and Vulnerable People Checks Procedure](#), [National Criminal History \(Police Record or NDIS Worker Screening\) Check Procedure](#)
- Two (2) reference checks (include questions on applicant's suitability to work with children or vulnerable adults)
- All new staff as part of on-boarding are to complete the applicable safeguarding e-learn module. Staff are required to read and become familiar with key safeguarding policies/procedures.
- Staff are required to read and sign the Mercy Code of Conduct and Code of Conduct Child Safety (Health Services Only)

4. Complaints/ Feedback

Complaints and feedback are managed in accordance with Mercy Health's existing complaints and feedback processes: [Health Services Feedback Management Procedure](#), [Healthy Ageing - Feedback Management Procedure](#). Where a person has concerns about serious wrongdoing, misconduct, unethical behaviour, or breaches of legal or organisational obligations, they may also make a disclosure under Mercy Health's [Whistleblowers Policy](#), [Healthy Ageing - Whistleblower Procedure](#), [Whistleblowers Procedure](#). Where matters relate to safeguarding, consultation will occur with Safeguarding, People and Culture, and other relevant stakeholders to ensure an appropriate, coordinated and timely response.

5. Risk Management and Continuous Improvement

Mercy Health will identify, assess and manage safeguarding risks across all services, environments and activities. Risk assessments will consider the needs of children, young people and adults at risk and support

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the implementation of controls to prevent abuse, neglect, exploitation and harm Mercy Health is committed to continuous improvement of safeguarding systems and practices through monitoring, auditing, incident reviews, complaints, feedback, emerging evidence, legislative changes and regular reporting.

Definitions

Term	Definition
Abuse	Abuse, as described by the WHO, is 'a single, or repeated act, or lack of appropriate action, occurring within any relationship where there is an expectation of trust which causes harm or distress to an older person'. It can take various forms, such as physical abuse, psychological or emotional abuse, financial abuse, sexual abuse, and neglect.
Adult at Risk	Any person, over the age of 18 considered 'vulnerable' or 'at risk' are those who are at an increased risk of abuse or neglect as they are unable to protect themselves against significant harm or exploitation. Adults can be abused in a variety of different locations. These include: • Their own homes • Care homes • Workplaces • Hospitals This broad definition of vulnerable/adult person, underpinned by human rights principles, encompasses 'adults at risk' a term being used in some contexts to promote a focus on risk factors rather than on an individual.
Catholic social teaching	Catholic Social Teaching (CST) offers a way of thinking, being, and seeing the world. It provides a vision for a just society in which the dignity of all people are recognised, and those who are vulnerable are cared for. It consists of an interrelated body of communities. Catholic social thought and principles which can be used to reflect on and guide how we relate to one another in our local and global communities.
Child	Any person under the age of 18 years.
Code of Conduct	Defines the expected standards of conduct for Mercy Health staff, volunteers, students and contractors, including behaviours that promote safety, respect and well-being, and behaviours that are inappropriate when interacting with children, young people, patients, consumers, families and carers.
Disclosure	Information shared by a person about an experience, concern, suspicion, or allegation of abuse, neglect, exploitation, or violence.
Neglect	According to WHO: Neglect includes both isolated incidents, as well as a pattern of failure over time on the part of parent or other family member to provide for the development and well-being of the child or adult at risk, in one or more of the following areas: health, education, emotional development, nutrition, shelter and safe living conditions.
Reportable Conduct (Reportable Conduct Schemes)	Reportable conduct is any alleged, suspected or substantiated conduct by a Mercy Health worker towards a child that involves a sexual offence, sexual misconduct, physical violence, behaviour causing significant emotional or psychological harm, significant neglect, or other conduct prescribed under relevant state-based Reportable Conduct Schemes. Such conduct must be reported, assessed and managed in accordance with legislative requirements and Mercy Health safeguarding procedures. CCYP About the Reportable Conduct Scheme (VIC) Landing page Reportable Conduct Scheme Office of the Children's Guardian (NSW)
Safeguarding incident	Any confirmed, suspected, alleged or disclosed abuse, neglect, exploitation, violence, misconduct or other behaviour that may cause harm to a child, young person or adult at risk.
Whistleblower	Is an individual who wants to make a report in connection to alleged misconduct and where the whistleblower wishes to avail themselves of protection against reprisal for having made the report.

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Key Legislation, Acts, Standards & References

	Applicable Groups	Jurisdiction
Aged Care Act 2024 (Cth)	Aged Care	Australia wide
Reporting for residential aged care Australian Government Department of Health, Disability and Ageing	Residential Aged Care	Australia wide
National Disability Insurance Scheme Act 2013 (Cth)	Disability	Australia wide
National Disability Insurance Scheme (Restrictive Practices and Behaviour Support) Rules (Cth)	Disability	Australia wide
Privacy Act 1988 (Cth)	All Groups	Australia wide
National Principles for Child Safe Organisations National Office for Child Safety	Children	Australia wide
National Catholic Safeguarding Standards - Australian Catholic Safeguarding Ltd	All groups	Australia wide
Crimes Act 1900 (ACT)	All Groups	ACT
Children and Young People Act 2008 (ACT)	Children	ACT
Working with Vulnerable People (Background Checking) Act 2011 (ACT)	All Groups	ACT
Child Safe Standards (NSW)	Children	NSW
Children's Guardian Act 2019 (NSW)	Children	NSW
Children and Young Persons (Care and Protection) Act 1998 (NSW)	Children	NSW
Child Protection (Working with Children) Act 2012 (NSW)	Children	NSW
Crimes Act 1900 (NSW)	All Groups	NSW
Criminal Code Act 1899 (Qld)	All Groups	QLD
Child Protection Act 1999 (Qld)	Children	QLD
Child Well-being and Safety Act 2005 (Vic)	Children	VIC
Children, Youth and Families Act 2005 (Vic)	Children	VIC
Child Safe Standards	Children	VIC
Crimes Act 1958 (Vic)	All Groups	VIC
Family Violence Protection Act 2008 (Vic)	All Groups	VIC
Mental Health Act 2014 (Vic)	Mental Health	VIC
Health Records Act 2001 (VIC)	All Groups	VIC
Worker Screening Act 2020 (VIC)	All Groups	VIC
Criminal Code Act Compilation Act 1913 (WA)	All Groups	WA
Working with Children (Criminal Record Checking) Act 2004 (WA)_	Children	WA
Children and Community Services Act 2004 (WA)	Children	WA
Reportable Conduct Scheme requirements (where applicable);	Children	VIC, NSW,

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Link with Organisational Values

Compassion:

- In articulating an open and inclusive approach to practice, this policy creates a context of **compassion** as fostering a spirit of generosity, kindness and support in being present to the needs of others.

Keywords

Abuse, neglect, National Catholic Safeguarding Standards, Adult at risk, child safety, safeguarding

Links to Related Documents

- [Code of Conduct Policy Code of Conduct with Children Policy](#)
- [Protection of Children Policy](#)
- [Aged Care Code of Conduct](#)
- [Family Violence Identification and Response \(MARAM\)](#)
- [Antenatal Family Violence Screening Practice Guideline](#)
- [Elder Abuse Management \(Health Services\) Procedure](#)
- [Healthy Ageing - Management of Elder Abuse and Neglect Procedure](#)
- [RAC - Provision of a Safe Environment in Aged Care Policy](#)
- [Employees Experiencing Family and Domestic Violence Policy](#)
- [Screening Policy \(including Police Record Check and Working with Children and Vulnerable People Checks\)](#)
- [Working with Children and Vulnerable People Checks Procedure](#)
- [Sexual Assault Clinical Guideline](#)
- [Protection of Children Procedure VIC](#)
- [Protection of Children Procedure NSW](#)
- [Protection of Children Procedure WA](#)
- [Protection of Children Procedure QLD](#)
- [Protection of Children Procedure ACT](#)
- [WMH Emergency Department Sexual Assault Procedure](#)
- [WHS Staff Assault Reporting Procedure](#)
- [Healthy Ageing - Incident Management \(Residents & Clients\) Procedure](#)
- [Reportable Conduct Policy](#)
- [Reportable Conduct Procedure](#)
- [Mercy Ministry Companions Safeguarding Framework and Resources](#)

Version History / Author / Contributors

V.	Date Created	Sections Changed	Created/Amended by
1	11/2014	New	EO to CEO
2	13/05/2020	Provided clarity on definition of vulnerability and groups experiencing increasing vulnerability Components on Mercy Way added. Added additional links Removed Safeguarding Vulnerable adults procedure as retired, Added additional legislation	EO to GCEO
3	12/11/20	Policy scope broadened to encompass children and concepts in the NCSS	EO to GCEO
4	March 2021	Review date amended to meet external compliance standard of 3 years.	EO to GCEO
5	August 2023	Updated policy requirements and who oversees Safeguarding	EA to Executive Director QSI
6	August 2026	Updated Safeguarding definition and commitment statement governance and links.	Safeguarding Program Lead, Early Parenting Centre DON, Family Violence and Safeguarding- Program Lead, Misson, Legal, People and Culture, Director Care Reimagined

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Appendix A: Safeguarding roles and Responsibility

Board	• Oversight of safety and risk • Approves and oversees the safeguarding framework, policy and major policy revisions. • Supports and promotes the effective implementation, compliance and continuous improvement of safeguarding throughout the organisation
Executive Directors	• Demonstrate leadership in safeguarding • Endorse policy procedures and practices • Demonstrates visible leadership and accountability for safeguarding, promoting a culture of safety, respect, inclusion and continuous learning across the organisation. • Provide sufficient resources to achieve implementation and ongoing compliance with safeguarding standards, policies, procedures and practices within their departments • Supports the development, implementation, compliance with and continuous improvement of the safeguarding framework, policy, procedures and practices.
Safeguarding Lead and Internal Practice Network	• Specialist oversight, secondary consultation and escalation • Monitor implementation and compliance with safeguarding standards, policies, procedures and practices • Supports workers in managing safeguarding concerns and abuse suspicions, disclosures, complaints and incidents. • Coordinates and supports the development, implementation, compliance with and continuous improvement of the safeguarding framework, policy, procedures and practices.
Managers	• Local leadership and response • Establish and maintain effective systems and processes that prevent or reduce the likelihood of harm to clients • Ensure incidents are reported, documented, and investigated in accordance with legislation and Mercy Health Policy and Procedures • Ensure investigation findings are acted upon • Provide leadership in building and maintaining a child and adult at risk safe culture • Ensure staff complete required professional development and participate in supervision
People and Culture	• Relevant Worker screening checks • Monitoring of Mandatory Training • Relevant worker registration (medical, nursing allied Health) • Incident reporting, work Health and Safety monitoring • Workplace support for employees experiencing Family Violence.
All Staff, volunteers and contractors	• Responsibility to prevent, identify and report harm • Promote safeguarding and model behaviours that support a safe culture. • Support implementation and compliance with safeguarding standards, policies, procedures and practices. • Comply with safeguarding standards, policies, procedures and practices. • Model behaviours that support a safe culture. • Treat children, young people, adults at risk, consumers, staff and volunteers with dignity and respect.
Visitors/residents/patients	• Comply with Mercy Health's safeguarding policies, visitor requirements and codes of conduct while on Mercy premises or participating in Mercy activities. • Report any safeguarding concerns, allegations, suspected abuse, neglect, exploitation, violence or inappropriate behaviour they witness or become aware of. • Contribute to a culture that promotes safety, inclusion and respect.