

## CLIENT PROTECTION POLICY

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### 1. PURPOSE

- 1.1 International Child Care College Pty Ltd (**ICCC**) is committed to the safeguarding and protection of vulnerable individuals who may work, study, or otherwise have interactions with the College for any purpose. This Policy is designed to ensure the rights, safety, and overall wellbeing of vulnerable individuals by providing guidance on safeguarding procedures, in accordance with relevant state and federal legislation.

### 2. SCOPE

- 2.1 In this Policy, “**Company**,” “**College**,” or “**ICCC**” refers to International Child Care College Pty Ltd.
- 2.2 This Policy applies to all employees of ICCC and all persons performing work at the direction of ICCC, collectively referred to as [**employees**]. This includes prospective employees during the recruitment process, contractors, trainees, and work experience students.
- 2.3 This Policy additionally applies to students of the College and any associated stakeholders, as well as children who attend children’s services where employees of ICCC may visit to conduct training and assessment.

### 3. DEFINITION

- 3.1 **Safeguarding** is protecting the welfare and human rights of people who are in connection with the College, particularly vulnerable individuals who may be at risk of abuse, neglect, or exploitation.
- 3.2 **Vulnerable individuals** are defined as people aged under 18, or other individuals who may be unable to take care of themselves or protect themselves against harm or exploitation. Vulnerable people may include (this list is not exhaustive):
- Children and seniors;
  - Disabled persons;
  - People from a low socio-economic background, or with low levels of literacy or education; and
  - Aboriginal and Torres Strait Islander persons.

### 4. COMMITMENT

- 4.1 ICCC is committed to fostering and providing a respectful, inclusive, and safe environment, as a workplace, and as a Registered Training Organisation (RTO). This commitment includes:
- Taking reasonable and proportionate measures to prevent, as far as possible, any risks or harms to the safety or wellbeing of vulnerable individuals, in the course of employment, training, recruitment, communications, or other purpose of connection or interaction with the College.
  - Providing access to quality services, training, and support;
  - Access to clear information about processes, employment conditions, training, and Company policies;
  - Maintaining privacy and confidentiality in the handling of personal information;

- Providing transparent mechanisms and processes for complaints handling and reporting; and
- Preventing victimisation against an individual or party who reports acts of harm towards vulnerable individuals.

## 5. MANAGING RISKS

- 5.1 ICCC recognises that potential acts of harm that a vulnerable person may be exposed to can lead to significant consequences. This can include mental and physical health and wellbeing issues, as well as the potential for significant legal and reputational consequences for all individuals or parties involved.
- 5.2 Potential acts of harm may include:
- Sexual harassment, or abuse/offences;
  - Threats of violence or actual violence;
  - Verbal, emotional, or social abuse;
  - Cultural or identity abuse, such as racial, sexual, or gender-based discrimination or hate crimes;
  - Coercion and exploitation; and
  - Abuse of power.
- 5.3 In connection to ICCC, identified risks vulnerable individuals may be exposed to include:
- **Environment** – e.g., A candidate waiting to attend an interview, sitting in an area that is isolated or poorly lit; or a student under the age of 18 left unsupervised with another individual in the study room.
  - **Behaviours** – Inappropriate behaviours or conduct toward a vulnerable individual. e.g., a student discriminated against because of a protected attribute; or inappropriate conduct around a child in a service.
  - **Unclear Reporting Process** – A vulnerable person being unsure or unaware of how to report an act of harm, due to issues such as unclear reporting lines or processes.

### Prevention

- 5.4 Prevention measures ICCC may implement for safeguarding purposes may include:
- Identifying possible risks as above, and administering strategies to avoid these risks to minimise the likelihood of occurrences.
  - Reviewing the culture of the organisation and seeking feedback and continuous improvement.
  - Annually reviewing and updating relevant policies and procedures in line with legislation and best practice.
  - In the course of recruitment for positions that may work directly with or around children, ensuring that candidates possess a Working with Children check, and from the commencement of employment, take reasonable steps to ensure ongoing monitoring of its validity.
  - For all position vacancies, contacting at least two referees supplied by a candidate, to confirm their identity and suitability to work with vulnerable people (where applicable).

- Ensuring employees have both awareness and an understanding of safeguarding risks and responsibilities, including expectations around appropriate interactions and behaviours, how to report acts of harm and inappropriate behaviour, and how to adequately support a vulnerable individual who has made a complaint/report.

## **6. REPORTING AND HANDLING**

- 6.1 Reports can be made by vulnerable individuals who have been directly impacted by an act of harm, or by others who observe or know of such acts, e.g., a parent.
- 6.2 Reports are handled in accordance with complaints/reporting Company policies and procedures. Depending on the situation, reports may be handled informally, or by formal means, such as a formal investigation.
- 6.3 An employee may internally report to:
- Their manager or another member of the leadership team; or
  - HR personnel.
- 6.4 A student or stakeholder may make a complaint or report as per ICCC's Complaints and Appeals Policy. Refer to this Policy for further information.

### **Safety of the impacted person**

- 6.5 Where ICCC is made aware of an act of harm towards a vulnerable person, the College's priority is the safety and wellbeing of the impacted person and any other individuals who may be exposed to inappropriate or unlawful behaviour and associated risk.
- 6.6 Where a criminal offence has occurred, the crime will be reported to the police in compliance with mandatory reporting obligations relevant to safeguarding and the protection of vulnerable people. This includes the obligation to report child sexual abuse offenders.
- 6.7 The impacted individual will receive ongoing support from ICCC as required, to ensure they are safe from further issue or harm.

### **Privacy and Confidentiality**

- 6.8 ICCC prioritises the privacy and protection of vulnerable persons, including in circumstances where an individual has been impacted by an act of harm. All details surrounding a report or an investigation are only exclusive to individuals who have direct and necessary involvement in the report or investigation process.

### **Preventing Victimisation**

- 6.9 Vulnerable individuals are safe to raise issues or make reports without fear of victimisation, or negative implications. Victimisation is against the law and will not be tolerated by ICCC. Any individual found to have victimised or taken reprisal action in such circumstances will be met with proportionate disciplinary action.

## **7. COMPLIANCE**

- 7.1 ICCC seeks and encourages the commitment of all employees regarding this Policy and is dedicated to ensuring that all employees are aware of and understand all elements of this Policy, and any associated policies and procedures.
- 7.2 Employees must comply with the requirements of this Policy. Any breach of this Policy may result in disciplinary action including, but not limited to, termination of employment.

## **8. REVISION HISTORY**

Rev	Date	Revision Description	Name
1	23/03/2021	Initial Policy	EL
2	18/10/2023	Updated contents and formatting to follow ICCC Policy standard	HR