

Safeguarding of Vulnerable People Policy

1. Overview

- Purpose** The purpose of this policy is to ensure vulnerable people that interact with, or are affected by, Fullife Foundation are kept safe.
- Who does this policy apply to?** This policy applies to:
- Fullife Foundation Directors
 - Fullife Foundation Volunteers
 - Fullife Foundation Project Partners
 - Participants of Ethiopia project visits
- Policy Changes** The Fullife Foundation Board will review this Policy every 2 years or earlier if warranted.

Version Control Table

| Version | Date | Changes | Created by | Authorised by |
|---------|----------|--|----------------|--------------------------|
| 0.1 | 23.11.20 | Initial draft | Janelle Murley | N/A |
| 0.2 | 20.03.24 | Second draft following Janelle & Ian meeting | Janelle Murley | N/A |
| 0.3 | 12.04.24 | Updated draft following board meeting 12.04.24 | Janelle Murley | N/A |
| 0.4 | 27.09.24 | Updated draft following legal review by Dave Sanders | Janelle Murley | |
| 1.0 | 14.03.25 | Updated version number following approval | Janelle Murley | Fullife Foundation Board |

2. Policy Statement

- 2.1. All people have equal rights to protection from abuse, neglect or exploitation.
- 2.2. Fullife Foundation commits to promoting and protecting the welfare of people that interact with, or are affected by, our work. We have no tolerance for abuse, neglect or exploitation.
- 2.3. All directors volunteers and partners of Fullife Foundation share responsibility for protecting vulnerable people from abuse, neglect or exploitation as far as it is within our control.
- 2.4. Fullife Foundation has a process for managing incidents that must be followed when one arises.
- 2.5. Fullife Foundation takes steps to ensure that project partners have controls in place to protect vulnerable people from abuse, neglect or exploitation

3. Roles & Responsibilities

While the responsibility to protect people is shared by all who work at or with Fullife Foundation, some individuals have specific obligations with which they must comply.

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| All people (including Directors and volunteers) | <ol style="list-style-type: none"> 1. Familiarise themselves with this policy and any associated procedures 2. Comply with all requirements 3. Adhere to the Safeguarding Vulnerable People Code of Conduct |
| Directors / Board Members | <ol style="list-style-type: none"> 1. Ensure appropriate and effective safeguarding processes are in place and all relevant laws relating to safeguarding are observed |

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| | <ol style="list-style-type: none"> 2. Promote a positive culture towards safeguarding 3. Facilitate the reporting of any suspected abuse, neglect or exploitation |
| CEO | <ol style="list-style-type: none"> 1. Ensure Fullife Foundation has effective and appropriate ways to manage safeguarding and legal compliance |
| Head of Risk and Governance Advisory | <ol style="list-style-type: none"> 1. Manage any referred reports of abuse, neglect or exploitation 2. Ensure that all volunteers are aware of relevant laws, policies, procedures and reporting obligations, including pre-travel briefing for anyone travelling to Ethiopia 3. Ensure assessment of risk is updated periodically as appropriate 4. Take steps to ensure that project partners have a commitment to the protection of vulnerable people |
| Project Partners | <ol style="list-style-type: none"> 1. Confirm that they have processes in place that ensure the safety of vulnerable people |

4. Policy Implementation

Fullife Foundation implements this policy statement in the following ways:

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| 4.1. Managing safeguarding risk | <p>Fullife Foundation will:</p> <ol style="list-style-type: none"> 4.1.1. Require all Directors, and any participant travelling with Fullife Foundation to Ethiopia, to: <ol style="list-style-type: none"> 4.1.1.1. Hold a Working with Children Check or equivalent 4.1.1.2. Read and adhere to the Fullife Foundation Child Protection Policy 4.1.1.3. Read and adhere to the Fullife Foundation Safeguarding Vulnerable People Policy 4.1.1.4. Read and sign the Safeguarding Vulnerable People Code of Conduct 4.1.2. Require all volunteers to read and sign the Safeguarding Vulnerable People Code of Conduct 4.1.3. Require all Project Partners to complete a Compliance Confirmation letter annually, which includes confirmation of adherence to all relevant child protection and safeguarding of vulnerable people laws and regulations |
| 4.2. Reporting & responding to incidents | <ol style="list-style-type: none"> 4.2.1. Any person must, as soon as practicable, report any suspicion that an incident has taken place, may be taking place, or could take place, by reporting the incident as per the Incident Response Procedure. 4.2.2. The investigating person/Director will respond to the incident report as per the Incident Response Procedure |

Refer to the **ACNC Governance Toolkit: Safeguarding Vulnerable People** for further guidance on how to respond to incidents.

5. Definitions

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| Abuse, neglect or exploitation | <p>All forms of physical and mental abuse, exploitation, coercion or ill-treatment. This might include, for example:</p> <ul style="list-style-type: none"> • Sexual harassment, bullying or abuse; • Sexual criminal offences and serious sexual criminal offences; • Threats of, or actual violence, verbal, emotional or social abuse; • Cultural or identity abuse, such as racial, sexual or gender-based discrimination or hate crime; • Coercion and exploitation; • Abuse of power |
| Vulnerable People | <p>Vulnerable people are children or anyone over the age of 18 who is or may be unable to take care of themselves, or is unable to protect themselves against harm or exploitation by reason of age, illness, trauma or disability, or any other reason.</p> <p>Vulnerable people can include:</p> <ul style="list-style-type: none"> • children and seniors • people with impaired intellectual or physical functioning • people from a low socio-economic background • people who are Aboriginal or Torres Strait Islanders • people who are not native speakers of the local language • people with low levels of literacy or education • people subject to modern slavery, which involves human exploitation and control, such as forced labour, debt bondage, human trafficking, and child labour. |
| Volunteer | <p>A volunteer of Fullife Foundation includes any staff member of Fullife Pharmacy working on Fullife Foundation activities as well as any participant of travel to Ethiopia to visit projects on the ground.</p> |

6. Legislation

National

Privacy Act 1988

[National Principle for Childsafe Organisations](#)

[ACFID Code of Conduct](#)

[ACNC External Conduct Standard 4: Protection Of Vulnerable Individuals](#)

State and territory legislation

[Child Safe Standards](#) 2022 (Victoria)

[Child Protection Act](#) 1999 (Qld)

International

[UN Convention on the Rights of the Child](#)

[The 1951 Refugee Convention](#)

Ethiopian Revised Criminal Code (2005)

Appendix 1

Fullife Foundation Safeguarding Vulnerable People Code of Conduct

Fullife Foundation Palms Australia is strongly committed to creating and maintaining an environment that promotes and protects the rights and dignity of vulnerable people and prevents all forms of abuse and exploitation of vulnerable people.

All directors, volunteers and third parties engaged by Fullife Foundation are expected to uphold the dignity of all with whom we work and abide by Fullife Foundation's Policy and Code of Conduct for the Safeguarding of Vulnerable People at all times. Failure to comply with this Code may result in disciplinary procedures, restriction of duties or termination of employment or other contractual agreements or relationships with Fullife Foundation.

As a representative of Fullife Foundation, I will:

- ✓ treat all vulnerable people with respect
- ✓ contribute to an environment that is supportive of everyone's emotional and physical safety
- ✓ not use language or behaviour towards vulnerable people that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate
- ✓ report any wrongdoing or suspicion of wrongdoing in relation to abuse, neglect or exploitation of a vulnerable person by reporting the incident to a Director as per the Incident Response procedure
- ✓ immediately report concerns or allegations of child exploitation and abuse and policy noncompliance in accordance by reporting the incident to a Director as per the Incident Response procedure
- ✓ Report any incident to the appropriate authority when it is reasonable to suspect that a person's safety or welfare is at risk
- ✓ be aware of behaviour and avoid actions or behaviours that could be perceived by others as exploitation and abuse of others
- ✓ not engage vulnerable people in any form of sexual activity, including paying for sexual services
- ✓ wherever possible, ensure that another adult is present when working near vulnerable people
- ✓ not use physical punishment on vulnerable people
- ✓ comply with all relevant Australian and local legislation, including labour laws in relation to child labour
- ✓ immediately report concerns or allegations of child exploitation and abuse and policy noncompliance in accordance with appropriate procedures
- ✓ comply with Fullife Foundation's Safeguarding Vulnerable People Policy

When photographing or filming anyone, or using their images for any purpose, I will:

- ✓ ensure images and associated information collected is strictly relevant to the work of Fullife Foundation in that community
- ✓ take care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a vulnerable person
- ✓ obtain their informed consent and/or the informed consent of the parent or guardian of the vulnerable person (group consent may be gained by the project partner in Ethiopia)
- ✓ ensure photographs, films, videos and DVDs present all people in a dignified and respectful manner and not in a vulnerable or submissive manner. All should be adequately clothed and not in poses that could be seen as sexually suggestive
- ✓ ensure images are honest representations of the context and the facts

- ✓ ensure file labels, meta data or text descriptions do not reveal identifying information about a vulnerable person when sending or publishing images electronically or otherwise

I have read the Fullife Foundation Safeguarding Vulnerable People Policy and Code of Conduct and understand my personal responsibility to abide by these guidelines at all times to protect myself and the vulnerable people I may come in contact with through my work for or with Fullife Foundation.

Signature _____

Print Name _____

Date _____