

Safeguarding Vulnerable Persons Procedure

CPSN works in partnership with our members to share knowledge, create connections and provide support.

CPSN is committed to rights-based, person-centred, high-quality, effective, and safe services and supports.

CPSN is committed to recognising, actively promoting, and safeguarding the human rights and inherent dignity of all people, and in particular, people aged under 18 or other individuals who may be at risk or are unable to protect themselves against harm or exploitation.

Record of procedure development

Version	Date approved	Date for review
Version 1.0	February 2026	February 2028

Responsibilities and delegations

This procedure applies to:	Members, Clients, and where appropriate, their decision makers, all staff, workers, volunteers, contractors, and the Board of CPSN
Procedure approval:	CEO
Review of Procedure Compliance	CEO
Specific responsibilities:	Board Chief Executive Officer General Manager Service Delivery Human Resources Manager CPSN Leadership Team

Procedure statement

This procedure outlines the practical steps CPSN takes to implement its Safeguarding Vulnerable Persons Policy and meet its obligations under the NDIS Quality & Safeguarding Framework, and the NDIS Practice Standards. It provides clear guidance to workers on how to prevent, identify, respond to, and report child safety concerns.

Definition

Employee means a person who is employed by CPSN with wages or salary.

Safeguarding - CPSN has adopted the definition of the Australian Charities and Not-for-profits Commissions which defines Safeguarding as “protecting the welfare and human rights of people that are, in some way, connected with” CPSN. <https://www.acnc.gov.au/for-charities/manage-your-charity/governance-hub/governance-toolkit/governance-toolkit-safeguarding>

Incidents of harm may include:

- sexual harassment, bullying or abuse
- serious sexual offences, such as rape
- 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
- abuse of power

Staff means all the people employed by CPSN or within a specific work area.

Vulnerable Persons - CPSN has adopted the definition of the Australian Charities and Not-for-profits Commissions which defines **Vulnerable persons** as a person “aged under 18 or other individuals who may be unable to take care of themselves or are unable to protect themselves against harm or exploitation.

While all people must be protected from harm, there are additional legislative and ethical considerations for protecting vulnerable people. Vulnerable people can include:

- 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.

Vulnerability may be either temporary or ongoing. Vulnerable people can include staff, volunteers, and people in third parties, such as partners.

Being able to recognise vulnerability in its various forms is important and the first step to being able to protect vulnerable people”. <https://www.acnc.gov.au/for-charities/manage-your-charity/governance-hub/governance-toolkit/governance-toolkit-safeguarding>

Worker means any person engaged by CPSN to perform a service, paid or unpaid, and may include but is not limited to employees, consultants, contractors, employees of a labour hire company, apprentices, trainees, students or volunteers.

Procedure

Purpose of this Procedure

This procedure outlines how CPSN operationalises its commitment to safeguarding vulnerable persons. It provides clear, practical guidance to prevent, identify, respond to, and report harm, abuse, neglect, exploitation, violence, discrimination or misconduct involving vulnerable persons, in line with the NDIS Practice Standards, the NDIS Code of Conduct, and relevant State/Territory legislation.

Scope

This procedure applies to:

- All CPSN employees
- All CPSN Workers
- Contractors, consultants and agency staff
- Board members
- Any person engaged by CPSN to deliver or support services

It applies to all CPSN service settings, including in-home, community, transport, office-based and online environments.

Roles & Responsibilities

Board

- Provide governance oversight for safeguarding
- Ensure appropriate policies, procedures and resources are in place
- Monitor safeguarding performance and compliance

CEO

- Lead a culture of safety, inclusion and accountability
- Act as the primary safeguarding contact (or delegate appropriately)
- Ensure compliance with legislation, standards and reporting obligations
- Oversee incident management, investigations and continuous improvement

CPSN Leadership Team

- Promote safeguarding in daily practice
- Ensure workers understand and follow this procedure
- Identify and manage safeguarding risks
- Respond promptly to safeguarding concerns
- Maintain appropriate records

Workers

- Promote safety, dignity and wellbeing at all times
- Maintain professional boundaries
- Identify and report safeguarding concerns immediately
- Participate in safeguarding training
- Cooperate with investigations and risk management actions
- Report all suspected or actual child abuse or harm immediately

Risk Management Process Prevention and Risk Management.

CPSN will proactively safeguard vulnerable persons by:

- Implementing safe recruitment and worker screening processes
- Providing induction and ongoing safeguarding training
- Identifying safeguarding risks through assessments, planning and supervision

- Implementing controls to reduce or eliminate identified risks
- Monitoring environments, practices and relationships

Safeguarding risks must be documented in relevant risk registers and reviewed regularly.

Professional Conduct and Boundaries

Workers must:

- Treat all people with dignity, respect and fairness
- Maintain appropriate physical, emotional, financial and digital boundaries
- Avoid conflicts of interest and power imbalances, including real and/or perceived conflicts of interest
- Follow CPSN's Code of Conduct and Professional Boundaries Policy

Any boundary concerns or breaches must be reported to CPSN leadership immediately.

Identifying and Responding to Safeguarding Concerns

Safeguarding concerns may arise through:

- Observations of behaviour or injury
- Disclosures by a vulnerable person, family member or others
- Changes in behaviour, mood or engagement
- Financial irregularities or unexplained changes
- Inappropriate worker conduct

Workers must not investigate concerns themselves beyond ensuring immediate safety.

Responding to immediate risk

If a person is in immediate danger:

- Call 000 (Police, Ambulance or Fire)
- Take reasonable steps to ensure the person's safety
- Notify the CEO or relevant manager as soon as practicable

Immediate safety of the vulnerable person is the priority without compromising personal safety.

Reporting all Safeguarding Concerns

All safeguarding concerns must be reported:

- Immediately to a CPSN manager or the CEO
- Via CPSN's Incident Management system

Where required, CPSN will notify:

- NDIS Quality and Safeguards Commission
- Police (relevant state/territory)
- Victorian Child Protection or Adult Safeguarding bodies or applicable interstate body
- Other regulators as applicable

Incident Management & Investigation

CPSN will:

- Assess and classify incidents in accordance with the Incident Management Procedure

- Implement immediate risk controls
- Conduct internal investigations where appropriate
- Ensure procedural fairness and confidentiality
- Cooperate fully with external investigations

Supporting Affected Persons

CPSN will:

- Provide support and information to affected individuals
- Respect preferences, communication needs and cultural considerations
- Facilitate access to advocacy where appropriate
- Ensure no victimisation or retaliation occurs

Training & Awareness

CPSN will ensure:

- Safeguarding training is included in induction
- Ongoing refresher training is provided
- Workers understand reporting pathways and responsibilities

Record Keeping & Confidentiality

All safeguarding records will be:

- Accurate, objective and timely
- Stored securely
- Managed in accordance with privacy and record-keeping requirements

BREACHES OF THIS PROCEDURE

Failure to comply with this procedure may result in disciplinary action, up to and including termination of engagement.

Monitoring Review & Continuous Improvement

This procedure will be reviewed:

- At least every two years
- Following a safeguarding incident
- When legislative or standards changes occur

Feedback, incidents, complaints and audit findings will inform continuous improvement.

This procedure will be reviewed every 2 years, or sooner if legislation, NDIS standards, or organisational requirements change.

This procedure will be reviewed:

- At least every two years
- Following a safeguarding incident
- When legislative or standards changes occur

Feedback from clients, families, workers and audits will inform continuous improvement.

Maintaining appropriate records

Records will be kept for seven years.

CPSN records are maintained using cloud-based technology systems, covering HRIS, CRM and Operational documentation.

All child safety records will be:

- Accurate, objective and timely
- Stored securely
- Managed in accordance with privacy and record-keeping requirements

Breaches to this Procedure

Failure to comply with this procedure may result in disciplinary action, up to and including termination of employment or engagement.

Forms & Policies that apply to this procedure

- Individual Supports Service Agreement
- Support Coordination Service Agreement
- Goals and Outcomes Procedure
- Diversity and Inclusion Procedure
- Training and Professional Development Procedure
- Individual Supports Manual
- Support Coordination Manual
- Risk Register
- Incident Management Procedure (contained in Policy)
- Complaints Management Procedure
- Worker Screening Procedure
- Safeguarding Vulnerable Persons Policy
- Professional Boundaries Policy & Procedure

Document Revision History

This document is only valid on the day it was printed.

Who	Version	Date	Description of review
CEO	1.0	February 2026	New Procedure