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Drafted by	Robyn Payens	Approved by Board on	2026-03-28
Responsible Person	Safeguarding Officer	Scheduled Review date	MARCH 2028

1) Introduction

These Safeguarding Procedures provide detailed guidance to implement the Days for Girls Australia Limited (DfGAL) Safeguarding Policy. They outline the practical steps, responsibilities, and processes required to protect children and vulnerable people, manage safeguarding risks, and respond to concerns or incidents. All volunteers, partners, and third parties must follow these procedures when undertaking activities connected to DfGAL to ensure compliance with legal obligations and the organisation’s commitment to safe, respectful, and inclusive environments.

2) Definitions

‘**Safeguarding**’ means protecting the welfare and human rights of people that interact with or are affected by DfGAL, particularly those that might be at risk of abuse, neglect or exploitation. This refers to any responsibility or measure undertaken to protect a person from harm.

A ‘**child**’ is any person under the age of 18 years.

A ‘**vulnerable person**’ is anyone who may be unable to adequately take care of themselves or protect themselves against harm or exploitation. This might be because of their age, disability, illness, socio-economic background, cultural or language background, being Aboriginal or a Torres Strait Islander, being subject to modern slavery, or some other disadvantage. The vulnerability may be either temporary or ongoing. Vulnerable people are not limited to the beneficiaries of DfGAL products and services. They can include DfGAL personnel, volunteers, partners and third parties.

A ‘**Check**’ is an assessment of the suitability of people to work with children or vulnerable people. There are differing requirements in each state (Working With Children Check or Working With Vulnerable People Check). This document refers to all of these as the “Check”.

‘**Abuse, neglect or exploitation**’ means all forms of physical and mental abuse, exploitation, coercion or ill-treatment. This might include, for example:

- Physical abuse, threats of actual violence
- Sexual harassment, grooming, sexual behaviours and activities
- Emotional abuse – bullying, shaming, verbal abuse, or social abuse

- Cultural or identity abuse, such as racial, sexual or gender-based discrimination or hate crimes
- Coercion and exploitation, including financial abuse
- Abuse of power, including neglect.

‘Reasonable grounds to suspect’ is a situation where a person has some information that leads them to believe that abuse, neglect or exploitation has taken place, is taking place or may take place.

3) Responsibilities

This policy applies to DfGAL personnel, volunteers, partners and third parties. Everyone has a responsibility to protect people, and some people have special responsibilities:

The **Board and Executive** are responsible for the following:

- Promoting a positive culture towards safeguarding and modelling safe behaviours
- Maintaining a current Safeguarding Policy in line with legislation
- Ensuring that DfGAL has effective and appropriate ways to manage safeguarding and legal compliance
- Ensuring that DfGAL observes all relevant laws relating to safeguarding
- Ensuring that reports to external parties are made where required
- Ensuring that DfGAL’s response to reports of risk of harm considers and lawfully prioritises the needs, rights and wishes of survivors.

The **Safeguarding Officer** is responsible for the following:

- Overseeing the compliance of DfGAL volunteers with the Safeguarding Policy
- Maintaining the database of Checks, training and related information across the organisation
- Advising the DfGAL Board on the Safeguarding Policy
- Working with the relevant DfGAL volunteers to ensure awareness of, and compliance with, the Safeguarding Policy.

Leaders - including but not limited to Team/Chapter Leaders and people with added levels of responsibility in the organisation are responsible for the following:

- Promoting a positive culture towards safeguarding and modelling safe behaviours
- Implementing these procedures in their area of responsibility
- Ensuring that the risks of incidents have been considered and minimised in their area of responsibility
- Facilitating the compliance of volunteers with safeguarding requirements, where applicable
- Facilitating the reporting of any suspected abuse, neglect or exploitation.

Volunteers who work with children or vulnerable people are responsible for:

- Contributing to an environment that is supportive of everyone’s emotional and physical safety during DfGAL activities and when representing DfGAL

- Being familiar with the Safeguarding Policy, the Safeguarding Procedure and the Safeguarding Code of Conduct and complying with all requirements
- Reporting any incident or suspicion that a child or vulnerable person's safety or welfare may be at risk during a DfGAL activity.

Other activity participants, including general team volunteers, visitors, children, parents, carers, or beneficiaries of DfGAL services, are responsible for the following:

- Behaving in a courteous and safe manner
- Contributing to an environment that is supportive of everyone's emotional and physical safety during DfGAL activities
- Reporting any suspicion that an incident may have taken place, is taking place, or could take place in the course of a DfGAL activity.

Partners, third parties and contractors are responsible for:

- Entering into a memorandum of understanding or similar as required, which includes supplying a copy of the organisation's safeguarding policy (or equivalent) and providing assurance that they are capable of and committed to protecting children and vulnerable people.
- Reporting any suspicion that an incident may have taken place, is taking place, or could take place in the course of their partnership with DfGAL.

4) Managing safeguarding risk

4.1 The way DfGAL manages the risks of safeguarding will be:

- **Holistic.** DfGAL and its stakeholders will work to prevent, detect and take action if an incident occurs.
- **Risk-based and proportionate.** DfGAL will regularly assess the risks to people in its operations and develop proportionate controls to mitigate those risks.
- **Survivor-centric.** DfGAL will put survivors at the heart of its approach to safeguarding.
- **Lawful.** DfGAL will ensure that it understands and complies with the law in everything it does, in all jurisdictions in which it works.

4.2 DfGAL will manage the risk of safeguarding by:

- The "Two-Person Rule"—ensuring that there is always more than one volunteer when working with children or vulnerable people and that the group is always visible to others.
- Having up-to-date and documented risk assessments
- Maintaining a register of DfGAL's legal obligations for safeguarding in all the jurisdictions in which it operates
- Having an action plan that sets out how it will manage safeguarding
- Adhering to DfGAL's Safeguarding Policy, Safeguarding Procedure and Safeguarding Code of Conduct
- Doing due diligence checks of volunteers and third parties as needed

- Implementing policies, procedures and systems that introduce controls to reduce the likelihood and consequence of incidents
- Conducting awareness-raising for stakeholders on risks, expectations, and individual responsibilities
- Maintaining two reporting processes:
 - the confidential reporting process (i.e., the Complaints Policy and Whistleblowers Policy),
 - the overt reporting process
- Having an incident response plan
- Monitoring and reviewing the effectiveness and proportionality of its safeguarding approach.

5) Privacy and Data Protection

- DfGAL will protect personal information recorded as part of its safeguarding efforts, respecting the privacy of the individuals involved, unless there is a risk to someone's safety. DfGAL will only share information with authorised individuals.
- All people who receive or hold safeguarding-related information will keep such information strictly confidential and not share it beyond what is required by this policy or legislation. Such information might include details of incidents or suspicions that breach the DfGAL Safeguarding Policy and Safeguarding Procedure.
- All DfGAL volunteers are required to maintain confidentiality in all circumstances, and they must securely store notes and information related to safeguarding.

6) Eligibility to Work with Children and Vulnerable People

DfGAL supports their volunteers who work with children or vulnerable people by providing the Safeguarding Policy, Safeguarding Procedures, Safeguarding Training, and support from Team/Chapter Leaders, Regional Representatives, and the Safeguarding Officer. DfGAL encourages any stakeholders with questions or concerns to discuss them with one of these leaders.

DfGAL decides who can work with children and vulnerable people on their behalf by considering relevant legislation, obligations to and agreements with partners, and risk assessments.

7) Responding to Incidents

DfGAL volunteers must report any suspicions of harm, neglect, or exploitation of vulnerable people linked to their DfGAL involvement, following the DfGAL Incident Response Plan. This is a mandatory requirement of DfGAL, and, where children are concerned, reflects state and territory requirements.

8) Safeguarding Training

DfGAL is committed to providing relevant training to all volunteers who require it. All training must be refreshed every 3 years.

Training will consist of three modules that address various areas of activity within DfGAL.

Module 1: Safeguarding DfGAL's Core Business – Making Kits

Within the usual operations of DfGAL, the safeguarding of vulnerable people is addressed in this module. This training ensures that people in leadership roles are aware of and are expected to practise safe behaviours with all people with whom they come into contact during DfGAL activities.

The following volunteers must complete this training:

- Team/Chapter Leaders and Co-Leaders
- Board Directors and Executive
- People with added levels of responsibility, e.g., sewing specialists, regional representatives, DfGAL officers, etc.

Module 2: Safeguarding activities with children and other vulnerable people

Some DfGAL activities will require additional training and may require a Working With Children/Vulnerable People Check. These activities may include:

- visits to schools involving direct contact with students
- visits to special needs groups (e.g., sheltered workshops etc.) involving direct contact with people with special needs
- Children or people with special needs participating in a DfGAL activity (e.g., a sew day or special event) where the activity is directed at these groups and there is direct contact with these participants.

Module 3: Safeguarding – distributions

This training module addresses the particular safeguarding issues in the setting of Kit distributions – within Australia and overseas.

9) Safeguarding Checks

The decision as to whether the volunteers involved in an activity require a Check will be assessed on a **case-by-case basis** by the Safeguarding Officer (in consultation with the COO and Board Directors if deemed necessary) in accordance with the legal obligations for safeguarding in the jurisdiction in question.

9.1 Contact with children/special needs groups in Australia

Any volunteer participating in an activity involving direct contact with children or vulnerable people is required to:

- Have a current and valid Check and complete the Safeguarding Information Form.
- Have this Check 'linked' to DfGAL through the relevant state system
- Complete Training Module 2: Safeguarding Activities with Children and other Vulnerable People and/or Training Module 3: Safeguarding - Kit Distributions (as applicable), including signing the DfGAL Safeguarding Code of Conduct
- Receive a safeguarding clearance email from DfGAL.
- Be provided with access to the Safeguarding Policy and Safeguarding Procedure.

9.2 Contact with children and vulnerable people outside Australia

Many countries do not have a Check process or safeguarding requirements. In these situations, volunteers are still required to behave in accordance with Australian laws regarding working with children, and DfGAL's commitment to protecting children and vulnerable people remains the same.

Anyone LEADING a Kit distribution is required to:

- Have a current and valid Check and complete the DfGAL Safeguarding Information Form.
- Have this Check 'linked' to DfGAL through the relevant state system
- Complete the DfGAL Safeguarding Training Module 3: Safeguarding - Kit Distributions, including signing the DfGAL Safeguarding Code of Conduct
- Receive a safeguarding clearance email from DfGAL
- Be provided with access to the Safeguarding Policy and Safeguarding Procedure.

Anyone who participates in (and is not the Leader of) a DfGAL Kit distribution is required to:

- Complete the DfGAL Safeguarding Training Module 3: Safeguarding - Kit Distributions, including signing the DfGAL Safeguarding Code of Conduct
- Receive a safeguarding clearance email from DfGAL
- Be provided with access to the Safeguarding Policy and Safeguarding Procedure.

9.3 Holding events and activities

9.3.1 Child-related work, events or activity

When holding a DfGAL event, the organiser must determine if the event is considered a child-related event and who needs to have DfGAL safeguarding clearance in order to be involved. This will be assessed on a case-by-case basis in consultation with the Safeguarding Officer.

The following activities are considered child-related events:

- Those which provide programs or services intended for children
- Those held in a child-related setting, e.g., a school or children's community club
- Those where children are visiting a DfGAL event, without a parent or carer present, and the activity is directed towards children.

The following activities are **not** considered child-related events:

- Those where contact with children is incidental, e.g., meeting children while holding a fundraising or awareness stall in public
- Those that are open to everyone – e.g., team sewing day, where a child or children present are in the care of their parent(s) or carer
- Those where volunteers have no contact with children, e.g., set-up/pack-up in another area.

9.3.2 Responsibilities of the organiser of a child-related activity

- Ensure all DfGAL volunteers who need it have completed the Module 2 Safeguarding Training and have a safeguarding clearance prior to the event or activity.
- Keep records of who was in attendance during the activity.

9.3.3 Creating a safe environment

While only some DfGAL events or activities (including physical and online) are 'child-related', all activities should allow participants to feel respected and safe from abuse, neglect or exploitation.

The following points will help to create a safe environment:

- Ensure that event leaders and volunteers are aware of the Safeguarding Policy and Safeguarding Procedure
- Create a risk assessment and response plan for the event:
[Event Risk Assessment and Response Plan \(Blank\)](#)
 - Review what is known or expected about the event and what risks might exist
 - Take action to reduce those risks, including writing a brief risk management plan
 - Where significant risks are noted, or risks are not easily managed, make more detailed written plans and consider reviewing the event plans with the DfGAL Regional Representative, Chief Operating Officer (COO) or the Safeguarding Officer.
- Prioritise the safety and well-being of children and vulnerable people in all decisions and activities. Children, vulnerable people and their Carers

should be informed of their rights and encouraged to raise concerns and suggest ways to improve their safety.

- Ensure that any social media posts follow our social media policy and Safeguarding Code of Conduct.

9.3.4 Insurance

DfGAL's event insurance is only valid within Australia and covers participants between 12 and 90 years of age only. Event organisers and Team/Chapter Leaders should ensure that they have appropriate insurance cover for activity participants.

9.3.5 Working with partners

Before engaging in any child-related activity with a partner, e.g. a community group, first check that their safeguarding policies are in line with those of DfGAL. Should there be any concerns, these should be raised with the COO or Safeguarding Officer.

10) Safeguarding Incident Response Plan

When responding to a safeguarding incident, volunteers are to act in accordance with the Safeguarding Policy and Safeguarding Procedure as well as any other internal documents providing guidance on the reporting of incidents and any relevant legislation and/or regulations.

The five key phases in the DfGAL Safeguarding Incident Response Plan are set out below:

- 1) **Forming a suspicion**
- 2) **Reporting a suspicion**
- 3) **Managing DfGAL's response to a suspicion**
- 4) **Taking action following a suspicion**
- 5) **Concluding a response to a suspicion**

10.1 Forming a suspicion.

Where there are reasonable grounds to suspect that a child or vulnerable person is at risk of harm as a result of inappropriate conduct by a DfGAL volunteer or in connection with a DfGAL activity, the concern must be reported.

The Safeguarding Procedure defines what constitutes *reasonable grounds to suspect* and requires all volunteers and third parties to report such concerns.

Failure to report instances, allegations, disclosures, or concerns about safeguarding will be viewed as a serious matter that, depending on the circumstances, may result in disciplinary action or dismissal.

While it is not necessary to have proof to make a report of suspicion of harm to a child or vulnerable person, reports should be made in good faith. In addition to DfGAL

Whistleblower protections, the state child protection systems protect people who make reports on reasonable grounds.

Should events leading to a suspicion of harm occur in a child-specific setting (school, children's club, etc.) or where children from such an organisation are visiting a DfGAL event, such suspicions must be reported to the leader or delegate from that organisation. The person reporting the suspicion should cooperate with that organisation in their safeguarding processes.

10.2 Reporting a suspicion.

Suspicions can be reported directly to the Board Chair (chairau@daysforgirls.org), the Chief Operating Officer (australia@daysforgirls.org), the Safeguarding Officer (safeguardingau@daysforgirls.org), the Regional Representative or the Team/Chapter Leader. All suspicions will be treated confidentially.

To report a suspicion of risk of harm, it is useful to note the following:

- The date, time and location of the incident
- The names of the child(ren)/person(s) involved
- Name of their parent/caregiver (if applicable)
- Name of the person whose behaviour caused concern
- Other people involved (including children) - as witnesses and/or contributors to risk
- Clear description of the event(s).

Any person with reasonable grounds to suspect risk of harm to a child may also report directly to the police or the relevant state authority. This is encouraged where high or immediate risk to the child exists and/or when the COO, Board Chair or delegate cannot be advised in a timely manner. The reporter must also advise the COO, Board Chair or DfGAL delegate so that appropriate safeguarding actions may be taken.

Where the risk of harm identified is of a serious and/or immediate nature, or a criminal offence is suspected or has been committed, the police should be contacted. Additionally, immediate efforts should be made to reduce further risk.

Persons making reports on reasonable grounds will be protected from reprisal under the Whistleblower Policy and Procedure. Please note that the circumstances (event, location) which led to the report and/or the need for immediate actions to reduce risk may prevent the reporter from remaining anonymous.

10.3. Managing DfGAL response to a suspicion

Team/Chapter Leaders must advise the COO, Board Chair or Safeguarding Officer of any such reports made to them and of their response.

Complaints that involve Team/Chapter Leaders, or are of a serious nature, or do not seem likely to be settled satisfactorily at the Team/Chapter level, should be referred to the COO or Board Chair.

The person receiving the report of a suspicion must notify the Safeguarding Officer, who will be responsible for managing the incident.

When receiving a report:

- Use active listening; be calm, supportive and reassuring with any potential victim or witness. Concentrate on making the person providing information feel that they are doing the right thing and that you are there to help them.
- Explain what you will do with the information.
- Explain that you are required to pass the information to DfGAL and that the matter will be taken seriously.
- Get as much information as possible from the source of the concern, if appropriate in the circumstances.

When receiving a report, **do not**:

- Make promises to any person, except to say that DfGAL will take the matter seriously.
- Investigate the matter yourself.
- Disclose the information to people other than those you are required to tell.
- Approach the suspect about the incident, challenge the suspect or share information about the incident with the suspect.
- Make judgements about the validity, credibility or veracity of the information.

Upon being notified of the incident, the Safeguarding Officer will:

- Ensure that all people, especially any survivor, are safe;
- Seek further information to help make decisions
- Ensure that the information will only be made available to people who need to know.
- Notify the police immediately if there is suspicion of imminent physical harm, including sexual abuse.

The Safeguarding Officer will convene an Incident Committee to work with them to resolve the incident. The members of this committee will be:

- COO, Board Chair (or delegate), Safeguarding Officer (or other Board-appointed Committee members as needed)

The purpose of the Committee is to provide accountability and guidance to the Safeguarding Officer, as well as knowledge and experience across different areas of the charity, to help successfully manage an incident.

The Incident Committee will be guided by these principles:

- What is the best way to carry out an internal investigation independently and objectively?

- What resources are available, internally or externally, to carry out an investigation to the correct level of competence and fairness?

During the course of this plan, survivors must receive support from DfGAL. This support must make the survivor feel safe and feel that their needs are being prioritised.

Similarly, any person under suspicion must be treated lawfully and with due regard for their own safety, security and needs.

In both cases, this includes providing the person with updates, keeping in mind the need for confidentiality.

The Incident Committee will assess any report and deal with it using the DfGAL Complaints Management Policy and Procedure. In doing so, they may, as appropriate:

- Report any suspicion of a criminal offence to the Police or the relevant criminal judicial body
- Meet all partner requirements regarding the reporting of incidents
- Report any qualifying matter to the ACNC
- Take disciplinary action against the DfGAL personnel if warranted.

Where a report is made to authorities, a summary of that report should be made, e.g., incident number assigned, date and time of report, person you spoke to, and any instructions given; and this information should be provided to the COO, Board Chair or delegate.

The DfGAL Board must be advised as soon as possible when a report has been made and of any subsequent events.

Anyone implicated in the report about risk of harm may address any concerns by following the DfGAL Complaints Management Policy and Procedure.

3.4 Taking action following a suspicion

The Incident Committee will consider the outcomes following an investigation. Possible outcomes may include:

- No further action
- Disciplinary action
- Seeking criminal prosecution, civil action or referral to law enforcement.

Following every incident, DfGAL will document the lessons learned, with the aim of improving the way it manages incidents. This will take a holistic approach, framed by the following questions:

How will DfGAL

- Better deter persons from behaving in this way again?
- Better detect an incident like this again?
- Better manage an incident like this again?

The Incident Committee will be responsible for meeting any obligations to report to an external body.

3.5 Concluding a response to a suspicion

To close an incident, the Safeguarding Officer must be satisfied that:

- There are records of the incident that show:
 - How the incident arose and how it was handled
 - The details of the original concern and other relevant information
 - The details of the decisions that were made
 - The evidence collected
 - The details of the actions taken
 - External reporting of the incident (if required).
- Lessons have been documented and used to improve the way DfGAL manages incidents in the future.

Administering this plan

Any information regarding the effectiveness and performance of this plan must be passed to the Safeguarding Officer.

This plan will be reviewed annually.

Related Documents

10.1 Legislation

Every state and territory in Australia has legislation covering the safeguarding of children and vulnerable people and what actions are required when a person is at risk of harm. Relevant legislation includes the following:

New South Wales (NSW)

- *Children and Young Persons (Care and Protection) Act 1998*
- *Child Protection (Working with Children) Act 2012*

Victoria (VIC)

- *Children, Youth and Families Act 2005*
- *Child Wellbeing and Safety Act 2005*

- *Worker Screening Act 2020*

Queensland (QLD)

- *Child Protection Act 1999*
- *Working with Children (Risk Management and Screening) Act 2000*
- *Working with Children (Risk Management and Screening) Regulation 2020*

Western Australia (WA)

- *Children and Community Services Act 2004*
- *Working with Children (Criminal Record Checking) Act 2004*

South Australia (SA)

- *Children and Young People (Safety) Act 2017*
- *Child Safety (Prohibited Persons) Act 2016*
- *Child Safety (Prohibited Persons) Regulations 2019*

Tasmania (TAS)

- *Children, Young Persons and Their Families Act 1997*
- *Registration to Work with Vulnerable People Act 2013*

Australian Capital Territory (ACT)

- *Children and Young People Act 2008*
- *Working with Vulnerable People (Background Checking) Act 2011*

Northern Territory (NT)

- *Care and Protection of Children Act 2007*

The operations of DfGAL is covered by Australian Charities and Not-for-profits Commission legislation including:

- *Australian Charities and Not-for profits Commission Act 2012 (Cth) (the ACNC Act)*
- *Australian Charities and Not-for profits Commission Regulation 2013 (Cth) (the ACNC Regulations)*
- *Charities Act 2013 (Cth) (The Charities Act).*

10.2 Other relevant policies and documents

1. DfGAL Complaints Management Policy and Procedure

2. DfGAL Social Media Policy and Procedure
3. DfGAL Whistleblower Policy and Procedure
4. DfGAL Safeguarding Training
5. DfGI Child Protection Policy

Approved by the DfGAL Board on xxxx

Uploaded in PDF format to Google Shared Drive xxxxx