



# PGL AUSTRALIA SAFEGUARDING POLICY

## 2024





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# General Policy Statement



**Anthony Jones**

Chief Executive Officer



**Carl Stanforth**

National Director Australia

February 2024

*PGL is committed to being the best-in-class operator that ensures the safety and protection of all our guests. We take responsibility for promoting the welfare of children, young people, and adults at risk to protect them from harm.*

## **Celebrating Children's Achievements:**

We positively encourage all children and young people to succeed and celebrate their achievements by actively reviewing, realising different abilities and creating an environment where all achievements are given attention and praise. We are particularly sensitive to the needs of children with additional needs who may achieve in a different way to their peers but are equally entitled to celebration.

## **Treating children with respect:**

We endeavour to treat all children and young people with respect, regardless of gender, race, sexuality, ability or culture. We ensure that everyone signs up to the PGL Codes of Conduct. We aim to empower all children and young people to participate.

## **We recognise that:**

- The welfare of the child, young person and adult at risk is paramount
- We ensure diverse cultural perspectives are respected, while recognising that such differences do not diminish a child's right to be safe or the organisation's responsibility to protect the child from harm. This applies to all children regardless of age, culture, religion, gender or disability
- Specific consideration must be given to the needs of vulnerable groups including Aboriginal and Torres Strait Islander and Pacific children, children with disability, and children from culturally and linguistically diverse backgrounds
- Working in partnership with children, young people, adults and their parents, carers and other agencies is essential in promoting their welfare
- There is no place for extremist views of any kind within PGL, whether from internal sources, external agencies or individuals

## **The purpose of the policy:**

- To outline our organisational standards in safeguarding children, young people and adults at risk across our business
- To provide clear expectations on our procedures that should be adopted in the event of a colleague suspecting a child, young person or adult at risk maybe experiencing, or be at risk of harm
- This policy applies to all staff, including senior managers and anyone working on behalf of PGL
- We will endeavour to safeguard children, young people and adults at risk by:
  - Valuing them, listening to them and respecting them
  - Adopting child protection guidelines through procedures and a code of conduct for colleagues and visitors
  - Explicitly prohibiting the use of corporal punishment
  - Recruiting colleagues safely, ensuring all necessary checks are made
  - Sharing information about safeguarding, child protection and good practice with children, parents, teachers and colleagues
  - Sharing information about concerns with agencies who need to know and involving parents and children appropriately
  - Providing effective management for colleagues through supervision, support and training

We are also committed to reviewing our policy annually and in line with any key legislative changes.



# PGL Safeguarding Aims



## PGL prides itself in ensuring

- Appropriate action is taken in a timely manner to safeguard children and young people
- All colleagues are aware of their responsibilities with respect to safeguarding.
- Colleagues are appropriately trained in recognising and reporting safeguarding issues

## Child safeguarding legislation

This policy and our practice at PGL complies with; The Victorian Child Safe Standards. Queensland Child Safe Standards. National Principles for Child Safe Organisations

PGL are in scope of the Victorian Reportable Conduct Scheme and as such, will report all allegations against a staff member student or volunteer to the CCYP, as required.

Regardless of legislative reporting requirements, PGL requires that everyone, irrespective of their legal mandate, has a moral and social responsibility to report concerns about child abuse and neglect.

## Key Definitions

Safeguarding and promoting the welfare of children

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes





# Roles and Responsibilities

Safeguarding and child protection is Everyone’s Responsibility. This policy applies to all colleagues, including senior managers and anyone working on behalf of PGL.

**All centre based colleagues will be aware of:**

- Our systems which support safeguarding, including this safeguarding policy, the staff code of conduct, the role and identity of the Designated Safeguarding lead on centre
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected
- The signs of different types of abuse and neglect, as well as specific safeguarding issues
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- Ensuring the visitors code of conduct is adhered to

**Centre Based Designated Safeguarding Lead responsibility:**

- The Designated Safeguarding lead takes responsibility for child protection and wider safeguarding on their centre
- To understand the laws relating to child protection as well as company policies and operating procedures
- To provide advice and support to other colleagues on child welfare and child protection matters
- To refer suspected cases, as appropriate, to the relevant body
- To openly encourage and nurture a protective and caring culture across their centres
- To encourage an environment which puts children’s interests first and actively supports a whistle- blowing policy
- To drive an honest, safe, two-way communication process between themselves and children, representatives, partners, parents and communities – welcoming scrutiny, making time to listen to them, and encouraging the expression of different views
- Ensure colleagues, students on placement and contractors are familiar with the child safeguarding policy and procedures and other supporting documents
- Provide support to colleagues, students on placement and contractors to take reasonable steps to ensure child safeguarding is upheld
- Ensure that the child safeguarding is visible and accessible to all stakeholders including parents/carers, children and young people and adults at risk
- To be proactively responsible for determining, administering and delivering additional training
- Be aware of the reports of child safety concerns or allegations of abuse made by their colleagues and support colleagues to follow correct procedures
- Offer support to the child, the parents, young person, adult at risk, the person who reports and the accused colleague or volunteer
- Initiate internal processes to ensure the safety of the child, young person, adult at risk, clarify the nature of the complaint and commence disciplinary process (if required)
- Make recommendations for change or improvements to current policies or operating procedures
- To know and establish links with local child protection agencies
- Escalate incidents to the Head of Safeguarding in line with PGL’s serious incident reporting

The Deputy Designated Safeguarding lead will be available to support, or deputise for the Designated Safeguarding lead in their absence. They will also handle any complaints or allegations against the Designated Safeguarding lead if appropriate.

**In country Designated Safeguarding lead and Deputy Designated safeguarding leads:**

- Develop organisational knowledge and awareness of safeguarding, ensuring all colleagues receive appropriate safeguarding training
- Ensuring robust reporting procedures are in place
- Support and provide advice to centre based Designated Safeguarding Leads and Deputies
- To oversee and ensure PGL’s safeguarding policy is fully implemented
- Report monthly on safeguarding as part of the business review with operating board members

| In country Designated Safeguarding Lead (DSL) | In country Deputy Designated Safeguarding Leads (DDSL) |
|---|--|
| Carl Stanforth                                | Michelle King<br>Richard Withycombe                    |





# Organisational Governance Arrangements for Safeguarding



**PGL's strong focus on governance in relation to our safeguarding, is to ensure a robust approach to reviewing the measures our organisation has in place and provide a forum for oversight and challenge. The image below demonstrates our governance arrangements;**



## Role of the Safeguarding Steering Group

The steering group will champion a culture of effective safeguarding across Australian centres, which is fundamental to an outstanding customer experience. The steering group members are key operational Australian leadership colleagues supported by PGL Head of Safeguarding and SEND.

The group will meet quarterly to ensure;

- Safeguarding standards and procedures are implemented to ensure practice is effective and consistently applied

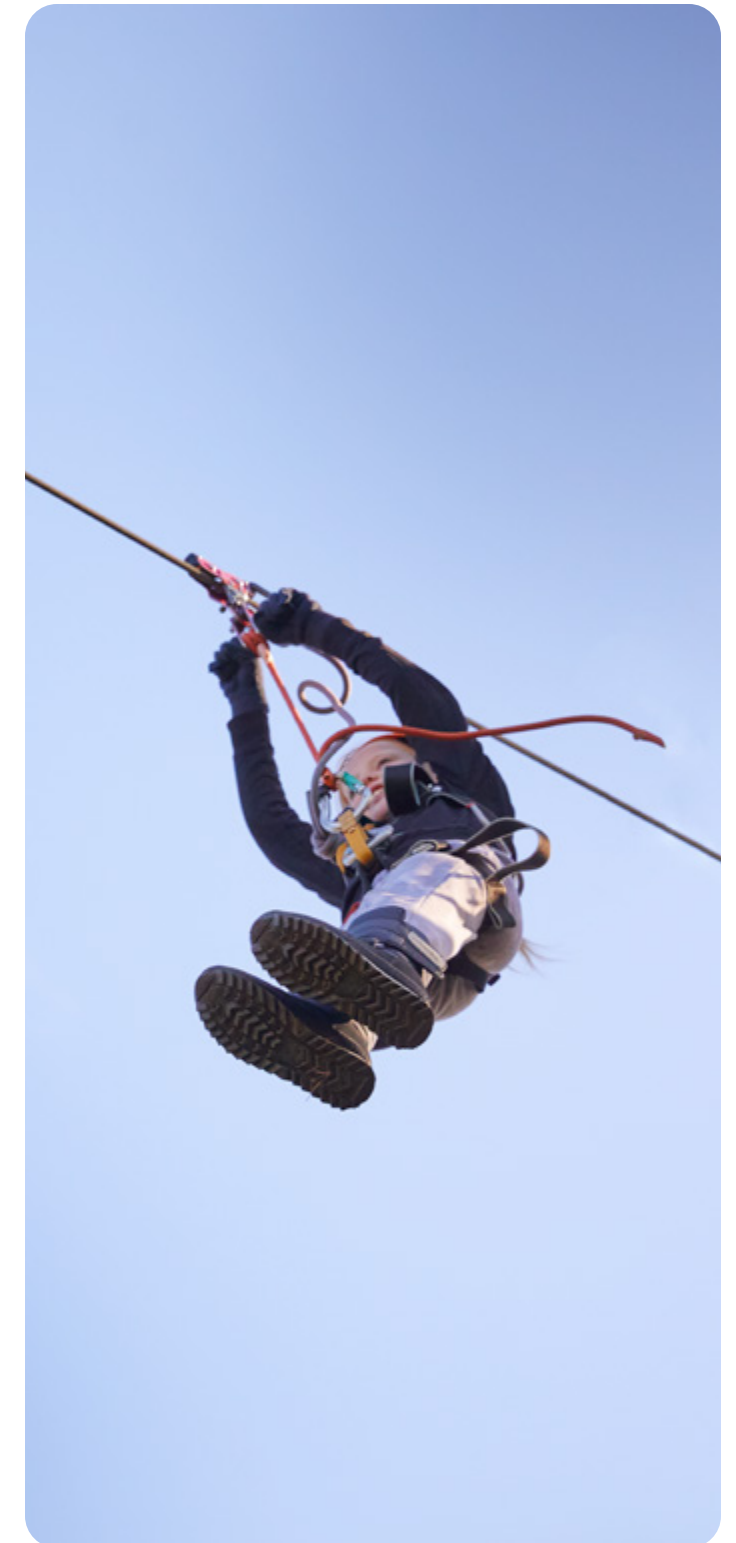
- PGL Australia has a safeguarding development plan in place and monitoring the progress of this plan
- Ensuring that all colleagues are engaged in contributing to the effective safeguarding culture of PGL
- Ensuring that any legislative changes, statutory guidance updates or professional bodies requirements are identified and reflected in any organisational change that needs to happen
- Ensure that PGL colleagues access learning and development opportunities regarding safeguarding in line with their roles and responsibilities
- Reviewing serious occurrences and overseeing actions from reports, particularly where there is specific policy, procedure and/or practice changes that need to be considered

## Role of the Safeguarding Board

The board will ensure the effectiveness of the safeguarding strategy across PGL. They will oversee the coordination of the safeguarding committee and drive the safeguarding priorities. The board will provide constructive challenge and scrutiny of the safeguarding measures across PGL. The PGL Directors are all members of the Safeguarding board.

Responsibilities of the Safeguarding board include;

- Reviewing minutes and actions from safeguarding committee, ensuring the committee are held to account for progress on safeguarding across the business
- Ensuring PGL has an annual safeguarding strategy, with clear priorities for the business to continue to be market leading
- Review any lessons learnt from serious safeguarding incidents
- Provide a level of effective independent oversight and challenge
- Agreeing annual report for publication







# Recruitment and Selection

We recruit all staff by obtaining full personal details and application forms with particular relevance to previous work with children and young people. The recruitment process is as follows:

- PGL's commitment to child safeguarding will be included on our website and in all job advertisements. In addition, PGL will ensure all roles have a formal position description outlining their roles and responsibilities and child safeguarding requirements
- Interviews are conducted using behavioural questions about real situations, tasks, actions and scenarios individuals have experienced. This enables those responsible for recruiting staff to assess if applicants are able to enact organisational child safeguarding requirements
- Colleagues responsible for recruitment will be trained and supported to undertake this responsibility. We also check and keep copies of relevant certificates on file
- PGL recognises that a history of criminal offences may not automatically disqualify an applicant from working with PGL. Consideration is always given to the legal limitations on employing certain ex-offenders and the company's duties in law; however, disclosures may contain details of spent convictions irrelevant to employment with children and therefore we risk assess each case individually. When considering whether to employ an ex-offender we consider a range of factors, including the nature of the crime, when it happened and the success of rehabilitation, the sentence, re-offending patterns, job requirements and safeguards against offending at work. We will keep a record of our considerations and any representations made by the individual as part of the assessment
- PGL request and take up two written references and are committed to ensuring verbal referee checks are conducted to inform decision making about their suitability to work with children. At least one of the referees must have directly supervised the candidate and observed their interactions with children if relevant to their role

- We require international police checks for all PGL Australia candidates who have worked or volunteered outside of Australia for a continuous period of more than 6 months during the past 10 years, unless that staff member has been employed by PGL in PGL's European operations within the last 6 months, in which case we will verify their suitability of working with children via the UK DBS system & PGL's HR records and in addition ask appropriate questions regarding any employment during the 6 month period prior to offering employment in our Australian centres. All international staff will be required to hold a valid working with children check within 4 weeks of arriving in Australia
- PGL require all colleagues, students on placement and contractors who engage in child-related work in Queensland to comply with the working with children laws operating in the State of Queensland and obtain a Blue Card. PGL require all successful applicants or existing Blue Card holders to link their existing Blue Card to PGL
- PGL require all colleagues, students on placement and contractors who engage in child-related work in Victoria to comply with the working with children laws operating in the State of Victoria and obtain a Working With Children Check. PGL require all successful applicants or existing WWCC holders to link their existing WWCC to PGL
- PGL will manage and maintain a register of required pre-employment checks to ensure all checks are kept up to date. In addition PGL will conduct routine audits every 6 months or according to the procedural guidelines of individual programs/services and ensure compliance
- If pre-employment screening checks are negative and/or if PGL receive an updated report that contains concerning content, PGL will take the appropriate steps to ensure the employee does not pose a risk to children
- PGL acknowledges that Working With Children Checks (WWCC) and/or Blue Cards alone do not assess someone's suitability to work with children and must be considered in a suite of child safe recruitment strategies







# Induction & Training

Training is important to ensure that everyone at PGL understands that child safety is everyone's responsibility.

PGL have a clear induction and training strategy detailing clear job descriptions, terms and conditions of employment, colleague responsibilities and all relevant procedures. . PGL colleagues receive safeguarding training throughout their career at PGL as part of their ongoing professional development.

All new colleagues receive health and safety, and child safeguarding training as part of their induction and sign to record they have received and understood the training and documentation related to child safeguarding. All new colleagues will have a probationary review within the first month of employment and will then be observed and appraised at regular intervals throughout their period of employment. The centre manager is responsible for ensuring this happens in line with PGL company policy.





# Recognising Abuse and Taking Action



We ensure and emphasise that everyone in our organisation understands and knows how to respond to concerns of abuse and neglect. If you have any concerns, it is important that you follow the reporting procedures outlined in the Responding to concerns section of this policy. PGL colleagues and contractors have a moral obligation to ensure that all children are safe from harm.

Child safeguarding concerns may arise in a range of ways, you may become aware of suspected or likely abuse because:

- you have seen something
- a child says they have been abused
- somebody else has told you they are concerned
- there has been an allegation against a team member
- there has been an anonymous allegation
- an adult has disclosed they are abusing a child
- an adult has disclosed they were abused as a child

Also remember that you may not always be working directly with the child but may become concerned because of difficulties experienced by the adults e.g:

- Peer domestic abuse incidents
- Mental health issues
- Substance and alcohol abuse incidents

Other concerns may be:

- Children living away from home or who have gone missing
- Peer abuse including bullying
- Sexual harmful behaviours in children
- Race and racism
- Violent extremism
- Sexual exploitation

- Female genital mutilation
- Forced marriage
- Concealed pregnancy
- Child trafficking
- Online-safety

## If a child makes a safeguarding disclosure to you:

1. Listen carefully to what they are saying – Be patient and focus on what you are being told. Try not to express your own views and feelings. Allow them time to talk freely and do not ask leading questions.
2. Stay calm and do not show that you are shocked or upset. – If you appear shocked or as you do not believe them it could make them stop talking and take back what they have said.
3. Let them know they have done the right thing in telling you – Reassurance can be a big impact. If they have kept the abuse a secret it can have a big impact knowing they have shared what has happened.
4. Tell them it is not their fault and they have done the right thing telling you. – Abuse is never a child's fault. It is important they hear, and know this.
5. Explain what will happen next and that you will have to pass this information on – Do not promise to keep it a secret.
6. Report to the Designated Safeguarding Lead or Deputy as soon as possible – Do not discuss with any other colleagues or with any accompanying adults. However, If you consider the child to be at immediate risk of harm tell the Designated Safeguarding Lead or deputy straight away.
7. Write up your conversation as soon as possible in the child's own words (Verbatim). – Stick to the facts, and do not put your own judgement on it.





# Allegations, Complaints, Disciplinary and Grievance Procedures

## Allegations

We have clear policies about handling allegations, dealing with complaints and our own disciplinary and grievance procedures; these details will be made available to all adults, children, parents and carers as necessary.

Any allegations against a colleague or student on placement must also be reported to the Lead as part of the process or immediately following the above procedure.

In Victoria these allegations may also fall under the Reportable Conduct Scheme. Reportable Conduct includes allegations against staff or contractors. It does not include allegations made within a family context or contexts external to PGL. Reportable Conduct includes allegations against colleagues and contractors in the PGL context and in their personal life.

We are clear that, in any case where a complaint has been made with regards to any inappropriate or poor practice, the outcome of an investigation by the authorities will be followed by an investigation by PGL following Reportable Conduct protocols. If the incident does not reach the threshold of reporting to CCYP, other internal policy and procedures may be followed.

## Historical Abuse

In all circumstances where historical abuse allegations are made which pertain to PGL, the organisation will co-operate fully with police investigations. Any allegation of historical abuse which pertains to PGL should be notified to the Director or their designate within 24 hours of receipt.

The Director will be responsible for overseeing the handling of the allegation, including confirming that it has been referred to the Police and that all relevant information held by PGL has been provided to relevant authorities.

At the conclusion of the Police investigation, the Director in consultation with Centre Leads will determine whether it is appropriate to undertake an internal investigation; an internal investigation would generally be warranted where college students or volunteers implicated in the allegation are still involved with PGL or if the incident occurred after the implementation of the Reportable Conduct scheme on 1 July 2017.

## Record keeping

PGL will keep confidential records of any child safety concerns, incidents or complaints should they arise, whether they are deemed reportable or not. Detailed descriptions of the incident or concern, evidence and actions taken, including incident forms, reports made to authorities and any other follow-up actions must be completed and recorded.

Notes and observations should be non-judgmental, easy to read and accessible. Documentation should include, dates, times and location, as well as details of any conversations. Reports should be accurate and impartial and without the use of derogatory or emotive language.

All hard copy and electronic records will be kept securely and will be accessible by the Designated Safeguarding Lead and/or deputy only.

In accordance with Royal Commission recommendations PGL will keep these records for 45 years. Records will also be kept in accordance with funding body obligations, as relevant.

## Whistle-blowing

PGL complies with whistle-blower legislation. If staff have concerns about their direct supervisor, managers or child safeguarding leads in Australia they should contact the Director or the authorities in Australia.

