



SIRIAN STAR

— Guiding souls to a better life —



HOOVES OF HOPE

— HEAL. GROW. THRIVE. —

— PARTNERS IN PURPOSE —

HEALING HEARTS • EMPOWERING LIVES • BUILDING BRIGHTER FUTURES

Rights and Responsibilities

Policy area: Rights and Responsibilities

Applicable to: Sirian Star Enterprises Pty Ltd

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Contents

Section 1: Rights and Responsibilities	3
1.1 Person-Centred Supports	4
Aboriginal and Torres Strait Islander People Policy and Procedure	4
Person-Centred Supports Policy and Participant Service Charter of Rights	9
Preferred Method of Communication Policy and Procedure	16
Person-Centred Supports Linkage Policy and Procedure	22
Advocacy Support Policy and Procedure - South Australia	25
1.2 Individual Values and Beliefs	33
Individual Values and Beliefs Policy and Procedure	33
1.3 Privacy and Dignity	39
Privacy and Dignity Policy and Procedure	39
Management of Data Breach Policy and Procedure	44
1.4 Independence and Informed Choice	53
Independence and Informed Choice Decision-Making Policy and Procedure	53
1.5 Violence, Harm, Neglect, Exploitation and Discrimination	59
Violence, Harm, Abuse, Neglect, Exploitation and Discrimination Policy and Procedure	59
Participant Safeguarding Policy	74
Working with Children Policy and Procedure - South Australia	78
Child Safe Environment Policy and Procedure - South Australia	85
Children and Young People Complaints and Feedback Policy and Procedure - South Australia	112
NDIS Worker Screening and Risk Assessed Roles Policy and Procedure	125
Zero Tolerance Policy and Procedure	139

Section 1: Rights and Responsibilities

Topic	Policy and Procedure
1.1 Person-Centred Supports	<ul style="list-style-type: none"> ● Aboriginal and Torres Strait Islander People Policy and Procedure ● Person-Centred Supports Policy and Participant Service Charter of Rights ● Preferred Method of Communication Policy and Procedure ● Person-Centred Supports Linkage Policy and Procedure ● Advocacy Support Policy and Procedure
1.2 Individual Values and Beliefs	<ul style="list-style-type: none"> ● Individual Values and Beliefs Policy and Procedure
1.3 Privacy and Dignity	<ul style="list-style-type: none"> ● Privacy and Dignity Policy and Procedure ● Management of Data Breach Policy and Procedure
1.4 Independence and Informed Choice	<ul style="list-style-type: none"> ● Independence and Informed Choice Decision-Making Policy and Procedure
1.5 Violence, Abuse, Neglect, Exploitation and Discrimination	<ul style="list-style-type: none"> ● Violence, Harm, Abuse, Neglect, Exploitation and Discrimination Policy and Procedure ● Participant Safeguarding Policy ● Working with Children Policy and Procedure ● Child Safe Environment Policy and Procedure ● Children and Young People Complaints and Feedback Policy and Procedure ● NDIS Worker Screening and Risk Assessed Roles Policy and Procedure <ul style="list-style-type: none"> – Transitional Requirements ● Zero Tolerance Policy and Procedure

1.1 Person-Centred Supports

Aboriginal and Torres Strait Islander People Policy and Procedure

1.0 Purpose

The purpose of this policy is to uphold the rights, dignity, and self-determination of Aboriginal and Torres Strait Islander people by providing culturally safe, inclusive, and respectful services. Sirian Star Enterprises Pty Ltd is committed to recognising and valuing the importance of culture, connection to Country, family, language, spirituality, and kinship for Aboriginal and Torres Strait Islander participants.

Our goal is to create an environment where participants feel safe, heard, and respected, and where their cultural identity is acknowledged and supported throughout the delivery of services. We honour the Traditional Owners of the lands on which we operate, paying respect to Elders past and present. We are committed to walking alongside Aboriginal and Torres Strait Islander peoples and communities in partnership, recognising their ongoing strength and resilience.

2.0 Scope

The policy applies to all staff involved in the delivery of services to Aboriginal and Torres Strait Islander participants.

3.0 Policy

Sirian Star Enterprises Pty Ltd is committed to providing culturally safe, trauma-informed, and person-centred supports that uphold the rights of Aboriginal and Torres Strait Islander participants to exercise choice, control, and connection to culture.

We recognise that Aboriginal and Torres Strait Islander participants may experience ongoing impacts of colonisation, discrimination, and systemic disadvantage. To ensure cultural safety and inclusive practice, staff will:

- Actively listen to participants' stories, values, and cultural preferences before initiating assessment or planning discussions.
- Respect participant guidance on culturally respectful behaviours, including verbal and non-verbal communication preferences.
- Understand and honour the participant's right to connect with community members, Elders, family, and kin in their support journey.
- Engage with participants in ways that uphold cultural identity, recognising that cultural expression and connection may change over time.
- Be mindful of personal biases and avoid assumptions about cultural needs or practices.
- Accept that cultural learning is an ongoing process and that "not knowing" is an opportunity to seek knowledge through respectful inquiry.

- Work in partnership with cultural advisors, Aboriginal and Torres Strait Islander staff, or local community members when appropriate.
- Support participant preferences for cultural or community-led support and acknowledge where families or kinship networks are preferred providers of support.

Where needed, support planning will be co-designed with the participant and their community, using culturally appropriate communication methods and incorporating feedback from trusted community representatives.

Staff will complete cultural awareness training as part of their induction and ongoing professional development. This includes training in cultural safety, communication, historical context, and how to deliver services that align with community protocols.

4.0 Procedure

Sirian Star Enterprises Pty Ltd is committed to meeting the requirements of the NDIS Practice Standards, including ensuring participants' rights to dignity, respect, privacy, and informed choice, delivering person-centred supports that are culturally responsive and safe, ensuring culturally safe mechanisms for participants to raise concern, and ensuring staff are trained and competent in culturally appropriate practices.

This policy aligns with the NDIS Code of Conduct by ensuring that staff act with respect for individual rights to freedom of expression, self-determination, and decision-making.

Our inclusive approach will promote the cultural safety of Aboriginal and Torres Strait Islander people through engagement with the participant, their community and all relevant stakeholders. Our processes are designed to meet the needs and requirements of the participant.

A variety of procedures may be implemented, including:

- incorporating symbols and images that reflect the indigenous culture in our marketing material, on our website and in our environment
- acknowledging the stigma, discrimination and exclusion experienced by people who identify as Aboriginal and/or Torres Strait Islander and how this may intersect with discrimination faced by a disability
- displaying a Statement of Traditional Owners
- clarifying if participants identify as Aboriginal and Torres Strait Islander
- contacting and maintaining networks with local Aboriginal and Torres Strait Islander communities
- working with community networks for the benefit and support of the participant
- contacting the participant's family, extended family and community
- establishing communication processes for maintaining an individual's indigenous supports

- working with other services in a coordinated manner to enhance support for the participant
- planning actions that promote cultural safety and connectivity while respecting the cultural and spiritual identity of Aboriginal and Torres Strait Islander communities
- researching and supporting community events for the participants and then sharing this information with all staff
- accepting the participant's preference to be supported by family and community
- working collaboratively to build family and community confidence and capacity
- identifying how, when, and why to source and work with different types of interpreter services in a culturally appropriate way
- collaborating with local communities to provide services, referrals, consortia involvement and memorandums of understanding

To promote cultural safety, Sirian Star Enterprises Pty Ltd will:

- Establish relationships with local Aboriginal and Torres Strait Islander Elders and cultural advisors to inform service delivery and ensure ongoing cultural safety.
- Offer participants the option to involve a cultural mentor or liaison in their planning and service delivery.
- Include cultural safety considerations in risk management planning and review incidents that involve breaches of cultural safety as part of incident management.
- Ensure participants have access to interpreters and cultural liaisons as needed.
- Facilitate ongoing partnerships and Memoranda of Understanding (MoUs) with Aboriginal Community Controlled Organisations (ACCOs) to support service delivery.

4.1 Advocacy information

A file review of all Aboriginal and Torres Strait Islander participants enhances our inclusive approach obligations. The review will determine if:

- service access and support strategies are relevant for Aboriginal and Torres Strait Islander people
- service involvement and links with the Aboriginal community and Aboriginal services are being provided as relevant
- cultural needs of the participants are documented in their support plans
- strategies and supports are implemented as per individual plans
- Aboriginal and Torres Strait Islander people should be given opportunities to voice their opinions and provide feedback on all aspects of their service. Staff should support the participant in voicing their opinions and knowledge in meetings. Participants must be allowed to discuss ideas and provide input to management to improve our services to meet their requirements
- Feedback from Aboriginal and Torres Strait Islander participants, families, and communities will inform continuous improvement. Sirian Star Enterprises Pty Ltd will review feedback and

incidents related to cultural safety as part of our Continuous Improvement Plan. Identified issues will be actioned through staff training, policy updates, or changes to service delivery

Culturally Safe Complaints Handling:

- Participants have the right to raise concerns about cultural safety without fear of discrimination.
- Complaints regarding cultural safety breaches will be prioritised and handled in a culturally appropriate manner.
- Participants may nominate an Aboriginal advocate or community Elder to support them in the complaints process.
- Complaints about cultural safety will be documented and reviewed as part of our Continuous Improvement Plan.

4.2 Staff and volunteer training

Sirian Star Enterprises Pty Ltd will train all staff and volunteers so that all front-line workers can capably implement Aboriginal or Torres Strait Islander cultural competence strategies. The training aims to increase access to the service by Aboriginal and Torres Strait Islander people.

Training may include:

- variability in Aboriginal and/or Torres Strait Islander cultures, beliefs, practices, languages, kinships and ways of living
- impact of European arrival, including inter-generational distrust of non-indigenous and government
- stigma, discrimination and exclusion that may be experienced and how this may intersect with discrimination faced from having a disability

Sirian Star Enterprises Pty Ltd will ensure that all staff and volunteers receive ongoing training in cultural safety, led or co-facilitated by Aboriginal and Torres Strait Islander trainers and community members where possible. This will include opportunities for reflective practice, cultural supervision, and case discussions to ensure continual learning and culturally safe responses in practice.

5.0 Related documents

- Staff Training Record
- Staff Training Plan
- Training Attendance Register – In-house
- Annual Organisational Training Register and Review and Review
- Easy Read Documents

6.0 References

- Disability Discrimination Act 1992 (Commonwealth)
- Human Rights and Equal Opportunity Commission Act 1986 (Commonwealth)
- Privacy Act 1988 (Commonwealth)
- Racial Discrimination Act 1975 (Commonwealth)
- Sex Discrimination Act 1984 (Commonwealth)
- NDIS Practice Standards and Quality Indicators 2021
- NDIS Workforce Capability Framework
- NDIS Code of Conduct 2018
- National Agreement on Closing the Gap 2020
- United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)
- NDIS Quality and Safeguarding Framework

Person-Centred Supports Policy and Participant Service Charter of Rights

1.0 Purpose

The purpose of this policy is to guide the delivery of person-centred supports that promote dignity, respect, safety, and individual choice for all participants of Sirian Star Enterprises Pty Ltd.

This policy ensures that each participant's personal values, goals, and needs are the foundation of their supports, and that services are delivered in a way that respects their culture, preferences, and identity. The focus is on maximising quality of life, enabling choice and control, and ensuring participants feel heard, valued, and supported at all times.

2.0 Scope

The policy applies to all staff involved in the delivery of supports at Sirian Star Enterprises Pty Ltd.

3.0 Policy

Sirian Star Enterprises Pty Ltd is committed to providing person-centred supports that uphold the rights, dignity, preferences, and cultural identity of every participant.

All supports and services will be delivered in accordance with the NDIS Practice Standards, NDIS Code of Conduct, NDIS Act 2013, and the United Nations Convention on the Rights of Persons with Disabilities. These frameworks inform our responsibility to respect, protect, and fulfil the rights of people with disability and ensure access to inclusive, high-quality, and culturally responsive supports.

We ensure participants are supported to exercise informed choice and control in all aspects of their lives and services. Participants are treated with compassion, respect, and honesty, and have the right to determine what supports work best for them.

Supports will be:

- Tailored to each participant's values, strengths, goals, and preferences
- Delivered in a way that respects cultural, linguistic, and spiritual diversity
- Inclusive of family, carers, and advocates where desired by the participant
- Informed by principles of safeguarding, trauma-aware care, and cultural safety
- Reviewed regularly to ensure supports continue to meet participants' needs

Sirian Star Enterprises Pty Ltd will protect participants' rights to freedom of expression, self-determination, privacy, and safety. We will act immediately to prevent and respond to abuse, neglect, exploitation, or violence.

Our Participant Service Charter outlines:

- The rights and responsibilities of all participants
- How participants can expect to be treated
- What they can expect from our service
- Their right to provide feedback or make a complaint at any time

The Charter is provided in accessible formats, including Easy Read, and is explained during onboarding. It is included in the Participant Handbook under clear headings such as *Your Rights*, *Your Responsibilities*, and *How to Give Feedback*.

Sirian Star Enterprises Pty Ltd applies a person-first approach and works alongside participants, families, advocates, and other services to co-design and deliver appropriate and flexible supports.

We also align with the NDIS Workforce Capability Framework to ensure all staff consistently meet participant expectations. This includes:

Our Relationship – Setting up our relationship for success

Your Impact – Understanding your role and the impact you have

Support Me – Helping participants pursue what matters to them

Be Present – Being fully present and available during supports

Check-in – Collaborating with participants to review what is and isn't working

These principles apply to all staff. General and advanced support workers are expected to fulfil all five objectives, while ancillary staff are expected to meet the first three.

4.0 Charter of Rights

4.1 Participants' rights

Participants have many individual rights. We understand these rights and work towards informing, supporting and assisting participants to achieve their goals and exercise their rights. Sirian Star Enterprises Pty Ltd adopts a policy of non-discrimination in providing our support services to individuals and the eligibility and entry to these services.

Participants have the right to:

- access supports that promote, uphold and respect their legal and human rights
- exercise informed choice and control
- freedom of expression, self-determination and decision-making
- access supports that respect culture, diversity, values and beliefs

- access a service that respects their dignity and right to privacy
- support access to make informed choices to maximise their independence
- have advocates, family, or chosen supporters involved in decision-making processes
- access supports free from violence, abuse, neglect, exploitation or discrimination
- receive supports that are overseen by strong operational management
- access services which are safeguarded by caring carers who work within a well-managed risk and incident management system
- receive information about complaints and incident management processes in accessible formats
- receive services from workers who are competent, qualified and have expertise in providing person-centred supports
- consent to the sharing of information between providers during transition periods
- select to opt-out of providing information, as required by NDIS

4.2 Participants' responsibilities

Participants are encouraged to engage with our services in a way that helps us deliver safe and effective supports. We ask that participants that they:

- respect the rights of our staff to ensure a workplace that is safe, healthy and free from harassment
- abide by the terms of their agreement with us
- understand that their needs may change and, correspondingly, services provided may need to change to meet their needs
- accept responsibility for their actions and choices, even though some decisions may involve risk
- inform us if they have any problems with our staff or the services received
- share appropriate information to develop, deliver and review their support plan
- care for their health and well-being (as much as they can)
- provide information that will help us better meet their needs
- provide us with a minimum of 24 hours notice if they will not be home for their service
- understand that our staff are only authorised to perform the agreed number of hours and tasks outlined in their service agreement
- contribute and participate in the safety assessments of their home
- control pets during service provision
- provide a smoke-free working environment
- pay the agreed amount for the services provided
- inform us in writing (where able) and provide appropriate notice before terminating our service
- advise our staff when asked if they wish to opt-out of a service

4.3 Participant's right to provide feedback

Sirian Star Enterprises Pty Ltd values all feedback, positive and negative. We ask participants to speak up and not be silent; we want to know when a service has been exceptional or when individuals are unhappy with the service received or believe they have not been treated fairly.

Participants have the right to provide feedback or make complaints without fear of retribution or negative consequences. If required, participants can be supported by a chosen advocate, family member, or representative when providing feedback. Participants will also be informed of external advocacy and complaints bodies if they prefer to raise concerns externally.

The participants will be offered the opportunity to provide input into our organisation's management. The participant can voice their opinions by attending meetings with management or other relevant persons and writing guiding feedback and emails. All options are open as we wish to hear how to improve their service.

Feedback can be provided in the following ways:

- completing a Complaints and Feedback Form
- talking directly to a staff member
- attending management meetings as a representative
- asking to speak to a more senior manager or supervisor
- contacting the office via the phone
- sending an email
- contacting us anonymously or completing the Anonymous Complaints and Feedback Form via our website www.sirianstar.com.au.

	Details
Operations Manager	Renae Gunn
Email	Renae@sirianstar.com.au
Phone	0403 283 872
Postal address	633 Blamey Road, Yarroweyah, VIC, 3644

We will acknowledge the complaint by responding within one working day. Sirian Star Enterprises Pty Ltd will resolve complaints openly, honestly and quickly. (See our Complaints and Feedback Policy and Procedure for further details).

If not satisfied with the resolution of a complaint, we recommend individuals contact the NDIS Quality and Safeguards Commission on 1800 035 544 (free call from landlines) or TTY 133 677.

Alternatively, individuals can lodge a complaint via the NDIS Quality and Safeguards Commission website. To view, go to forms.business.gov.au/smartforms

4.4 NDIS Code of Conduct

Our team is committed to following the NDIS Code of Conduct, ensuring all participants receive safe, respectful, and high-quality supports. To enable us to support you effectively, we ask that you communicate openly and respectfully with staff, share relevant information, and let us know if anything is not working for you.

Our team will provide support or quality services to participants, their families, and advocates. To enable us to do this, we request that all participants:

- provide complete and accurate information about themselves and their situation
- explain any changes in their health
- inform their staff if they cannot keep an appointment or commitment
- complete consent forms so that we can work with an advocate (if applicable)
- act respectfully and safely towards other people using the service and towards our front-line worker
- provide feedback about the service and advise how services could be improved
- report back to us if you are unhappy with our services or if there is any matter of concern

4.5 Our commitment to participants

Sirian Star Enterprises Pty Ltd takes a strengths-based, person-centred, holistic approach to care and support, where the participant or their advocate is primary to the decision-making process. Our team will ensure that services are managed respectfully and that we consult participants. When dealing with our stakeholders, we will:

- treat people with respect
- treat individuals courteously, fairly and without discrimination
- inform participants of their rights and responsibilities through our orientation process, Easy Read documents and handbooks
- protect personal information
- involve participants in any decisions regarding the services they access
- assist participants in connecting with other services, if needed
- inform how to provide feedback on our services
- ensure participant safety and undertake practices that prevent injury
- assist participants in accessing and using our services
- comply with signed service agreements

- inform participants of their rights and responsibilities
- arrange for an interpreter or other language services, if required
- respect individual views, opinions, personal circumstances and cultural diversity
- provide advice and options regarding other supports and services that may be available
- ensure staff have the appropriate skills and competencies to meet participants' needs
- treat everybody with dignity, fairness and respect, without discrimination or victimisation
- advise how complaints can be made and provide information on how we will respond to that complaint
- provide support and care that recognises and acknowledges individual preferences, choices, interests and capability
- support the right for participants to receive quality care in an appropriate environment, which promotes participation
- give participants a voice in all aspects of their services
- listen and respond to the participant as per the NDIS Workforce Capability Framework
- provide services that meet, or exceed, relevant industry standards such as the NDIS practice standards and quality indicators, NDIS rules, and their charter of rights

We will ensure all staff follow our safeguarding policies, including responding to concerns of abuse, neglect, or exploitation. We will engage participants in decisions about risk and safety, balancing their right to take informed risks with our duty of care. We will provide services that respect cultural identity, lived experiences, and individual needs, including trauma-informed and person-led approaches.

5.0 Related documents

- Participant Handbook
- Complaints and Feedback Form
- Anonymous Complaints and Feedback Form
- Complaints and Feedback Policy and Procedure
- Information Management Policy and Procedure
- Consent Policy and Procedure
- Reportable Incident, Accident and Emergency Policy and Procedure
- Privacy and Dignity Policy and Procedure
- Aboriginal and Torres Strait Islander People Policy and Procedure
- Individual Values and Beliefs Policy and Procedure

6.0 References

- NDIS Code of Conduct Rules 2018
- NDIS Workforce Capability Framework
- NDIS (Complaints Management and Resolution) Rules 2018
- NDIS Practice Standards and Quality Indicators 2021
- United Nations Convention on the Rights of Persons with Disabilities

- NDIS (Incident Management and Reportable Incidents) Rules 2018
- NDIS Quality and Safeguarding Framework
- National Standards for Disability Services (NSDS)
- National Disability Insurance Scheme Act 2013

Preferred Method of Communication Policy and Procedure

1.0 Purpose

The purpose of this policy is to ensure that each participant receives clear, respectful, and accessible communication that aligns with their individual needs, preferences, and communication styles.

This policy affirms Sirian Star Enterprises Pty Ltd's commitment to person-centred support, recognising that effective communication is essential to upholding the rights, dignity, and autonomy of participants. Communication preferences may vary based on language, culture, cognitive ability, disability, or trauma history, and these preferences will be respected in all interactions.

This policy aims to guide staff in identifying, recording, and using each participant's preferred communication method to ensure participants understand and are understood, enabling them to make informed decisions and exercise choice and control.

2.0 Scope

The policy applies to all staff involved in communication with participants at Sirian Star Enterprises Pty Ltd.

Definitions

Term	Definition
Interpreter	<p>A person who interprets and translates speech orally or in sign language.</p> <p>An interpreter translates the spoken words based on whatever grammatical knowledge of the language they interpret, and their interpretation is based on their expertise in the subject.</p>
Translator	<p>A translator is a professional person who translates one language into another language.</p> <p>A translator must be equipped with excellent linguistic skills. They must have a sound knowledge of <u>grammar</u> and express the thoughts presented in the language to a participant.</p>
Mode of communication	<p>This term is an expressive medium or channel of communicative intent expression - natural speech, facial expression and gesture. Exceptional communication modes include the use of graphic symbols or synthetic speech.</p>
Easy Read documents	<p>Easy Read documents simplify information so it is easy to understand by the participant. It uses simple text and pictures to explain text and has lots of white space.</p>
Communication Aids	<p>Tools that assist individuals in expressing themselves, such as picture boards, communication cards, voice-output devices, and digital apps.</p>

3.0 Policy

Sirian Star Enterprises Pty Ltd is committed to delivering supports in a way that respects and responds to the communication needs of every participant. All communication must be clear, accessible, and aligned with the participant's identified preferences.

In accordance with the NDIS Practice Standards, NDIS Code of Conduct, and the United Nations Convention on the Rights of Persons with Disabilities, all communication must uphold the rights of participants to be informed, included, and understood. Communication practices will be inclusive, culturally appropriate, and trauma-informed, supporting independence and self-determination.

At the point of intake, each participant's preferred method of communication will be discussed, recorded, and reflected in their Participant Support Plan. Staff must refer to this information and ensure their communication approach matches the participant's preferences.

Examples of communication methods may include:

- Verbal explanation and discussion
- Written documentation
- Easy Read materials
- Visual demonstration or modelling
- Communication boards or AAC (Augmentative and Alternative Communication)
- Oral interpreters for spoken language
- Written translators for translated documents

Participants can request to change their preferred communication method at any time. Where a participant has a communication partner, advocate, or support person, they will be involved where appropriate and with the participant's consent.

Staff are expected to ask clarifying questions if unsure, seek advice from the Senior Care Coordinator and adjust their communication style to ensure understanding. Communication must always be respectful, free of jargon, and delivered in a way that supports the participant's right to understand, participate, and express their views.

4.0 Procedure

At the initial contact meeting, staff will consult with the participant and their family or advocate to determine the most preferred mode of communication.

4.1 Initial Meeting

The Senior Care Coordinator will undertake the following steps:

1. Determine the best means of communication via discussion or assessment.
2. Record this mode of communication in the support plan.
3. Inform all staff who work with the participant.
4. Match staff with these skills or train and support staff to communicate.
5. Prepare the relevant form of information for provision to the participant
6. Arrange for an interpreter or translator (if required).

The Senior Care Coordinator will also identify any cultural, linguistic, cognitive, or sensory considerations that may impact communication and ensure appropriate support, including culturally appropriate interpreters or communication aids.

4.2 Provision of Information

Staff are to use the information gained in the initial meeting to provide information to the participant in their mode of communication, where information must be discussed with the participant. Methods that will be used may include:

- providing information in written Form without any adjustments
- providing information in written form using Easy Read Documents
- explaining the information orally to those with issues with reading or comprehending written documents
- demonstrating information (if able to do so)
- accessing an interpreter via [Translating and Interpreting Services](#), Department of Home Affairs.

4.3 Communicate effectively

Staff must review information to determine how best to communicate with the participant. All communications must be:

- clear, inclusive and respectful
- adapted to suit the participant's age, culture and cognitive ability.

Staff must monitor their verbal and non-verbal communication styles as they will differ from the participant and find ways to communicate effectively. The participant and staff member must be persistent and patient to work out the best communication means.

Staff must ensure that communication is trauma-informed and sensitive to past experiences of abuse, neglect, or discrimination. Staff should be aware of non-verbal cues and adjust their communication to ensure participants feel safe, heard, and respected.

Communication techniques that should be used include:

- using plain English
- speaking clearly
- checking for understanding
- using body language
- keyword signing

To enhance independence, staff may need to use tools and adaptive techniques such as:

- alphabet or word boards
- communication charts or cards

4.4 Documentation

Staff must document:

- The participant's consent for any interpreter or communication support involved.
- How participant confidentiality and privacy are maintained during communication.
- Any changes to communication preferences over time, reviewed regularly.

Record the following in the participant's file and support plan:

- best means of communication
- type of information method used to inform the participant
- verbal explanation – by whom, when, and how
- list of information supplied
- how the participant agrees that they had been informed (verbal, signature, guardian or advocate)

5.0 Related documents

- Participant Intake Form
- Support Plan
- Easy Read - Planning With You
- Participant Handbook
- Easy Read Documents
- Consent Policy and Procedure
- Information Management Policy and Procedure
- Reportable Incident, Accident and Emergency Policy and Procedure
- Privacy and Dignity Policy and Procedure
- Aboriginal and Torres Strait Islander People Policy and Procedure
- Individual Values and Beliefs Policy and Procedure

6.0 References

- NDIS Code of Conduct Rules 2018
- NDIS Practice Standards and Quality Indicators 2021
- NDIS Workforce Capability Framework
- NDIS Act 2013 (Commonwealth)
- Privacy Act 1988 (Commonwealth)
- Work Health and Safety Act 2011 (Commonwealth)
- United Nations Convention on the Rights of Persons with Disabilities
- NDIS (Incident Management and Reportable Incidents) Rules 2018
- National Disability Insurance Scheme Act 2013
- National Disability Advocacy Program (NDAP)
- NDIS Quality and Safeguarding Framework
- Disability Advocacy Finder

Person-Centred Supports Linkage Policy and Procedure

1.0 Purpose

The purpose of this policy is to ensure that people with disabilities are supported to exercise choice and control, and to participate in and contribute to social, cultural, and economic life on an equal basis with others.

This policy aims to strengthen inclusive practices by supporting participants to connect with community-based activities, government services, and other opportunities that align with their personal goals and aspirations. Each person is recognised as a valued member of society with the right to access, inclusion, and full participation in all aspects of community life.

2.0 Scope

The policy applies to all staff involved in supporting people with disabilities to access community-based activities, government services, and opportunities that align with their personal goals.

3.0 Policy

Sirian Star Enterprises Pty Ltd is committed to ensuring that participants are supported to connect meaningfully with their community and to participate in activities that promote inclusion, independence, and wellbeing.

All supports will be delivered in line with the NDIS Practice Standards, NDIS Quality and Safeguarding Framework, and the Information, Linkages and Capacity Building (ILC) Policy Framework, and will reflect the principles of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).

Sirian Star Enterprises Pty Ltd recognises the importance of person-centred, culturally safe, and trauma-informed support. Staff will actively seek opportunities to assist participants in achieving their personal goals through meaningful social participation and community connection.

In support of this, Sirian Star Enterprises Pty Ltd will:

- Provide participants with accessible information about mainstream services, local resources, and community activities relevant to their goals and interests
- Promote inclusion by developing relationships with community organisations, clubs, and groups to facilitate local engagement opportunities
- Support participants and families to access recreational, peer support, and mentoring opportunities to promote personal growth and resilience
- Assist family members and carers in accessing services and supports that offer respite and strengthen community connections

- Build the capacity of key workers, including linking them to carer support networks and development programs, to ensure sustainable and effective support delivery
- Promote equity and inclusion by working in partnership with culturally and linguistically diverse (CALD) communities and Aboriginal and Torres Strait Islander organisations

All staff will be trained in facilitating linkages and supporting participants to exercise choice and control when accessing or disengaging from services or activities. Participant involvement in planning will be ongoing and driven by the individual's voice, goals, and feedback.

4.0 Procedure

Sirian Star Enterprises Pty Ltd will follow this policy to allow participants to maintain their ability to participate in and contribute to society. Front-line workers are required to ensure that participants are:

- connected within their community
- informed about relevant activities to allow the participant to make decisions and choices
- provided with the necessary skills to participate confidently and contribute to the community and protect their rights
- assisted to use and benefit from mainstream services
- assisted in participating in, and benefiting from, community activities
- supported to contribute to leading, shaping and influencing their community

To ensure person-centred, safe, and inclusive supports, Sirian Star Enterprises Pty Ltd will:

- Engage with participants, families, and advocates to identify their interests, goals, and preferred community and mainstream activities.
- Provide accessible, plain language, and Easy Read information about available options.
- Facilitate participant-led decision-making, respecting their right to accept or decline linkage opportunities.
- Collaborate with culturally appropriate organisations to ensure participants' cultural and linguistic needs are met.
- Use a trauma-informed approach, acknowledging past experiences that may affect participation and building trust over time.
- Review and document participant goals, linkage outcomes, and feedback in their Support Plan.
- Monitor and address barriers to participation, including discrimination, access issues, and lack of culturally safe options, and advocate on behalf of participants if needed.

Staff will regularly review the participant's engagement in community and mainstream activities to:

- Ensure the opportunities continue to align with the participant's goals and preferences.
- Address any barriers or issues encountered, including potential risks, and adjust strategies accordingly.

- Document participant feedback and outcomes in the Support Plan.
- Facilitate reviews in collaboration with participants and their chosen supporters, respecting their right to withdraw or change activities.

5.0 Related documents

- Agency Referral Form
- Participant Information Consent Form
- Support Plan
- Advocacy Support Policy and Procedure
- Aboriginal and Torres Strait Islander People Policy and Procedure
- Individual Values and Beliefs Policy and Procedure
- Consent Policy and Procedure
- Information Management Policy and Procedure

6.0 References

- NDIS - Framework for Information Linkages and Capacity Building
- NDIS Practice Standards and Quality Indicators 2021
- NDIS Code of Conduct Rules 2018
- NDIS (Incident Management and Reportable Incidents) Rules 2018
- National Disability Insurance Scheme Act 2013
- NDIS Quality and Safeguarding Framework
- United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)
- National Standards for Disability Services (NSDS)

Advocacy Support Policy and Procedure - South Australia

1.0 Purpose

The purpose of this policy is to ensure that all participants are informed of, and supported in, their right to use an advocate or representative of their choice at any stage of service delivery. Advocacy enables participants to have their views heard, make informed decisions, and protect their human rights when interacting with Sirian Star Enterprises Pty Ltd.

This policy promotes fair and transparent practices that respect participant voice and ensure that advocacy is welcomed and supported across all areas of service engagement, including entry, planning, implementation, review, and exit.

2.0 Scope

The policy applies to all staff involved in supporting participants to exercise their right to engage an advocate or representative at any stage of service delivery.

3.0 Definition

Advocacy is the active support for a cause or position, and, in this context, it is an expression of support for a person who may find it difficult to speak for him or herself. It may include achieving social justice, improving a person's well-being, preventing abusive, harmful and discriminatory treatment, or stopping unjust and unfair treatment from meeting their fundamental needs and interests.

Under the NDIS Practice Standards, all participants have the right to access independent advocacy and to be supported to make informed decisions about their lives and services.

Below is a list of six types of advocacies:

Type of Advocacy	Description
1. Individual advocacy	The advocacy aims to prevent or address instances of discrimination or abuse using a one-on-one approach
2. Systemic advocacy	They are working to influence or secure long-term changes to ensure the collective rights and interests of people with disabilities
3. Family advocacy	A family member advocates to provide a voice on behalf of another family member
4. Citizen advocacy	Matches people with disabilities to volunteers

Type of Advocacy	Description
5. Legal advocacy	Upholds the rights and interests of people with disabilities by addressing the legal aspects of discrimination, abuse and neglect
6. Self-advocacy	Supports people with disabilities to advocate for themselves or as a group

4.0 Policy

Sirian Star Enterprises Pty Ltd is committed to upholding every participant's right to access and involve an advocate or representative of their choice. Advocacy plays a vital role in protecting participant autonomy, ensuring informed consent, and promoting safe and equitable service delivery.

In line with the NDIS Practice Standards, NDIS Code of Conduct, and the NDIS (Complaints Management and Resolution) Rules 2018, Sirian Star Enterprises Pty Ltd will ensure that advocacy options are offered, explained, and respected across all stages of service provision.

Sirian Star Enterprises Pty Ltd will:

- Inform participants of their right to use an advocate at the beginning and throughout their engagement with the organisation
- Provide accessible information about advocacy services, including Easy Read formats, translated materials, and verbal explanation when required
Refer participants to culturally appropriate, independent advocacy services when requested or when a need for advocacy is identified
- Promote participant capacity for self-advocacy and decision-making through respectful and inclusive support practices
- Include advocates in assessment, planning, delivery, and review processes, with the participant's consent
- Recognise and uphold directions provided by an authorised advocate, within the limits of lawful and ethical service provision
- Support the use of substitute decision-makers when participants are unable to advocate for themselves and formal arrangements exist

Where a participant asks a staff member to act as their advocate, the following steps must be taken to ensure transparency and the management of any conflict of interest:

- The staff member must complete a Conflict of Interest Declaration and Authority to Act as an Advocate Form
- The conflict must be documented in the Conflict of Interest Register

- Management will review the arrangement and provide oversight to ensure ethical boundaries are maintained and the participant's rights are safeguarded

Staff must engage respectfully with all advocates and representatives, treating them with the same consideration and professionalism as they do the participant. All advocacy arrangements will be recorded in the participant's file and reviewed as part of regular service planning and review processes.

4.1 Advocacy principles

- Sirian Star Enterprises Pty Ltd will ensure that all staff receive training in using advocates.
- Sirian Star Enterprises Pty Ltd will maintain printed material on advocacy and advocacy services.
- Sirian Star Enterprises Pty Ltd will maintain local advocacy resource/contact lists.
- Sirian Star Enterprises Pty Ltd will act positively with any worker appointed as a participant's advocate.
- Sirian Star Enterprises Pty Ltd will work cooperatively with any nominated advocate chosen by the participant and show the same respect to the advocate as is shown to the participant.
- Sirian Star Enterprises Pty Ltd will utilise a governance system to enable Sirian Star Enterprises Pty Ltd to identify where a participant needs advocacy.

Participants will be informed of their right to advocacy during intake and onboarding and at regular review points.

Where a participant nominates a staff member to act as an advocate, a Conflict of Interest Declaration and documented strategies will be required, and this conflict will be actively monitored.

5.0 Procedure

Participants will be provided with information about advocacy in an accessible format that meets their needs, including using Easy Read documents. Advocacy rights will be discussed:

- During intake and assessment
- During planning and review of services
- When any significant decisions are being made about services

Where advocacy concerns are raised, participants will be informed of their right to make a formal complaint, and advocacy support can be provided to assist with this process.

5.1 Initial assessment (participant without an advocate)

- Discuss the participant's right to appoint and have an advocate present to speak on their behalf.
- Provide the participant with advocacy information.

- Explain to the participant their rights regarding advocacy as per the Sirian Star Enterprises Pty Ltd's Service Agreement and Charter of Rights and the NDIS Practice Standards and Quality Indicators 2021.
- Advise the participant that if they wish to utilise advocacy services, Sirian Star Enterprises Pty Ltd can assist them in contacting any of these services.
- Provide the Authority to Act as an Advocate Form to the participant if they decide to utilise the services of an advocate. The completed and signed Form is stored in the participant's file.
- Provide the Third-Party Information Release Consent Form to the participant. The completed and signed Form is stored in the participant's file.
- Discuss and document any specific communication issues or protocols between the service and the advocate (email, phone, or other methods).
- Inform the participant that they can add and withdraw approval for an advocate to act on their behalf.

5.2 Initial assessment (participant with advocate/representative)

Before initial assessment

- Ensure during initial contact with the participant that they are informed of their right to an advocate and record the advocate's details if they have one.
- Determine the best means of communication (refer to Preferred Method of Communication Policy).
- Advise the participant of the need to complete the Authority to Act as an Advocate Form and provide the appropriate Form to the participant.
- Contact the nominated advocate to ensure they are aware they are nominated and confirm that they agree to advocate.
- Place the completed Authority to Act as an Advocate Form in the participant's file.
- Ensure the potential participant is aware of their advocacy rights, including the right to have an advocate present for all assessments, meetings and communication between themselves and Sirian Star Enterprises Pty Ltd.
- Schedule the participant's initial assessment at a time and date to allow the advocate to be present.
- Arrange for an identified advocate to be present at the assessment.

At initial assessment

- Request the completion of the Authority to Act as an Advocate Form if it has not yet been provided. Explain to the participant that the Form must be completed for Sirian Star Enterprises Pty Ltd to formally recognise the nominated person as the participant's advocate.
- Gather information about the advocate, such as contact details and methodology.

- Explain that the participant has the right to change their advocate. In writing, the participant should document changes using the Authority to Act as an Advocate Form (Easy Read form available).

5.3 Working with advocates

Where conflicts arise between a participant's wishes and their advocate's views, staff will prioritize the participant's expressed preferences wherever possible, in line with safeguarding and duty of care obligations.

Staff will also support participants to build capacity for self-advocacy and independent decision-making, where appropriate, through training, accessible information, and ongoing encouragement.

- Identify the existence of an advocate in the participant's file.
- Discuss and document any specific communication issues or protocols between the service and the advocate.
- Communicate with a participant's advocate and involve them in goal setting, planning service responses, and referrals for additional or alternative services.
- Provide the advocate with ongoing information regarding the health and well-being of the participant, as agreed.
- Ensure that all on-call workers are aware of the participant's advocate.

5.4 Continuing work with advocates

- During reassessments, visits, or meetings, provide participants with written and verbal information that reminds them of their right to have (or change) an advocate.
- Remind participants of their right to have (or change) an advocate during each annual review of services or written communication.
- Communicate effectively and work cooperatively with advocates.
- Refer participants assessed as 'not able to manage their service' (and who have no other advocate) to the South Australian Government Office of The Public Advocate, as appropriate.

Note: A web link accessing disability advocacy services is available. As a postcode, town or suburb is required to be entered to access services, Sirian Star Enterprises Pty Ltd will guide and assist participants. Go to [Disability Advocacy Finder](#) on the Department of Social Services website.

6.0 Related documents

- Conflict of Interest Declaration
- Conflict of Interest Register
- Staff Training Record
- Staff Training Plan
- Training Attendance Register – In-house
- Annual Organisational Training Register and Review
- Authority to Act as an Advocate Form
- Third-Party Information Release Consent Form
- Complaints and Feedback Policy and Procedure
- Participant Safeguarding Policy
- Zero Tolerance Policy and Procedure
- Reportable Incident, Accident and Emergency Policy and Procedure

7.0 References

- Information Privacy Principles (SA)
- Disability Inclusion Act 2018 (SA)
- Human Rights and Equal Opportunity Commission Act 1986 (Commonwealth)
- Privacy Act 1988 (Commonwealth)
- Disability Services Act 1986 (Commonwealth)
- Disability Discrimination Act 1992 (Commonwealth)
- Australia's Disability Strategy 2021-2031
- NDIS Practice Standards and Quality Indicators 2021
- NDIS Code of Conduct (2018)
- NDIS (Complaints Management and Resolution) Rules 2018
- NDIS Quality and Safeguarding Framework

8.0 Advocacy information

Organisations	Websites
Australian Centre for Disability Law	disabilitylaw.org.au
Autism Asperger's Advocacy Australia (A4)	a4.org.au
The Autistic Self Advocacy Network of Australia and New Zealand	asan-aunz.org
Blind Citizens Australia	bca.org.au
Brain Injury Australia	braininjuryaustralia.org.au
Children and Young People with Disability Australia	cyda.org.au
Deaf Australia	deafaustralia.org.au
Deafness Forum of Australia	deafnessforum.org.au
Disability Advocacy Network Australia (DANA)	da.org.au
First Peoples Disability Network (FPDN)	fpdn.org.au
Human Rights Council of Australia	hrca.org.au
Inclusion Australia (National Council on Intellectual Disability - NCID)	inclusionaustralia.org.au
Intellectual Disability Rights Service (IDRS)	idrs.org.au
Mental Health Australia	mhAustralia.org
National Disability Services	nds.org.au
National Ethnic Disability Alliance (NEDA)	neda.org.au
People With Disability Australia	pwd.org.au
Physical Disability Australia (PDA)	pda.org.au
Short Statured People of Australia	sspa.org.au
Women with Disabilities Australia (WWDA)	wwda.org.au

8.1 South Australia advocacy providers

Advocacy Provider	Website
Disability South Australia	<u>Disability_SA</u>

1.2 Individual Values and Beliefs

Individual Values and Beliefs Policy and Procedure

1.0 Purpose

The purpose of this policy is to ensure that people with disabilities are supported in ways that uphold and respect their individual values, beliefs, cultural identity, and personal preferences.

Sirian Star Enterprises Pty Ltd acknowledges the diverse and multicultural nature of the Australian community and recognises the rights of all participants to express and live according to their beliefs, practices, and identities. This includes participants from Aboriginal and Torres Strait Islander communities, culturally and linguistically diverse (CALD) backgrounds, LGBTQIA+ communities, and people of all faiths and worldviews.

The organisation is committed to working alongside each participant to promote inclusion, respect, dignity, and meaningful engagement in the life of their community.

2.0 Scope

The policy applies to all staff involved in delivering services or interacting with participants.

Sirian Star Enterprises Pty Ltd is committed to delivering inclusive, culturally safe, and person-centred supports that recognise, respect, and celebrate each participant's unique values, beliefs, and identity. We support participants to maintain their cultural practices, express their individuality, and make informed decisions about how they wish to live and be supported.

In line with the NDIS Practice Standards, Code of Conduct, and Australia's Disability Strategy 2021–2031, our organisation will:

- Provide trauma-informed, culturally responsive, and non-discriminatory supports that promote dignity and human rights.
- Ensure that services are accessible and inclusive of all people regardless of culture, ethnicity, language, gender, sexuality, age, disability, or socioeconomic status.
- Collaborate with participants to identify and record their cultural needs, values, beliefs, and preferences in their support plans.
- Respect participants' rights to religious or spiritual expression and work sensitively with them to support participation in cultural or religious practices.
- Provide staff with training to understand cultural diversity, including cultural safety for Aboriginal and Torres Strait Islander participants and awareness of LGBTQIA+ inclusion.
- Identify barriers that may limit participant access or engagement and implement strategies to promote equity and inclusion.

- Establish respectful and collaborative relationships with participants' families, communities, and key cultural supports.
- Provide information in accessible formats and support participants in connecting with relevant community organisations and networks.
- Encourage participant involvement in community life and support the development of natural supports, friendships, and inclusive opportunities.
- Actively seek feedback from participants to shape service delivery and governance practices.
- Ensure all decisions affecting a participant's support are informed by their values, identity, and expressed wishes, and that they are involved in decision-making to the fullest extent possible.
- Partner with mainstream and community services to build inclusive pathways and promote connection to culture, community, and opportunity.
- Respect participants' privacy and confidentiality, and support their right to self-determination in all aspects of their life.

Sirian Star Enterprises Pty Ltd will uphold the United Nations Convention on the Rights of Persons with Disabilities and will actively work to eliminate discrimination, foster belonging, and promote the rights of all people to lead full and meaningful lives within their communities.

3.0 Procedure

Sirian Star Enterprises Pty Ltd will ensure that all participants are treated fairly and in a non-discriminatory manner. This intent incorporates both intake and service delivery processes. Information provided will be in an Easy Read format, but we will arrange relevant support in the home language or an interpreter. For any participant with an information reading or understanding barrier, a support person will be provided to assist the participant in understanding what is said to them.

All staff must ensure that participants are treated in ways that respect their values, beliefs, identities, and choices. This includes:

- Ensuring culturally safe and trauma-informed communication.
- Documenting participant preferences about cultural, religious, gender identity, and other beliefs in their Support Plan.
- Supporting participants to take informed risks while safeguarding their right to self-determination.
- Reviewing preferences regularly and updating records with participant consent.

Our team assists the participant in decision-making about their level of participation in their relevant support. Sirian Star Enterprises Pty Ltd will support the participant to access supports linked to their culture, diversity, values and beliefs. The type of support and responses will be determined through consultation with the participant and will follow the choices made by the participant. Below are guidelines to assist staff in the process:

- pursue contacts that the participant has chosen

- contact local communities, e.g. cultural, religious, sexual orientation groups or spiritual groups, including Aboriginal and Torres Strait Islander communities
- contact government agencies to seek support for individual participants
- source community members and groups to provide input into the service
- contact advocates to assist with the development of community support plans for the participants
- support the participant's rights to seek contact with those in the community relevant to their wishes, goals and aspirations. The participant will be encouraged to join with related community links, as required
- follow the participant's aspirations and needs to participate in the community actively

Sirian Star Enterprises Pty Ltd will make relevant contacts for the participant to assist in initial involvement with their selected group or individual.

Sirian Star Enterprises Pty Ltd will work with Aboriginal and Torres Strait Islander people and culturally diverse groups to actively engage with their communities. Support provided by their community is incorporated within the participant's support plan. This support will be assessed, monitored and reviewed to ensure that the goals and aspirations of participants are met using the relevant community supports.

Sirian Star Enterprises Pty Ltd will provide services that meet the aspirations and goals of the participant for inclusion in the community.

Our organisation will work with the community to actively encourage participation in various activities, including employment, education, sporting, cultural, and relevant activities.

We are committed to building relationships with and between key stakeholders, including governments, organisations and communities, to obtain the best result for their participants.

Sirian Star Enterprises Pty Ltd will ensure that their services are tailored to flexibly meet their participant's needs, acknowledging that each person's needs are different.

Sirian Star Enterprises Pty Ltd will prioritise providing early intervention and prevention in each participant's case. By understanding the root causes of any issues and intervening early, problems can be effectively managed. Sirian Star Enterprises Pty Ltd will undertake cultural competency training for staff to increase knowledge and build strategies to work inclusively.

Sirian Star Enterprises Pty Ltd promotes inclusion by:

- working closely with a network of health and allied health professionals to be able to support the holistic needs of our participants

- building effective partnerships with the participants and their families, advocates and support people to discuss and foster shared priorities and understand the participant's individual needs and goals
- focusing efforts on building social inclusion and participation opportunities within the range of services provided
- providing information on community events and other relevant networks that meet participants' needs and identified goals
- working within a participant's networks and supports, e.g. childcare, kindergarten, school or home environments, to allow Sirian Star Enterprises Pty Ltd to assist the participant foster relationships and increasing participation in familiar surroundings
- instigating a Person-Centred Supports Linkage Policy and Procedure outlining how Sirian Star Enterprises Pty Ltd will work with other communities for the betterment of their participants
- operating in a manner that ensures all people can access our services

3.1 Understanding individual responsiveness – cultural and linguistically diverse

Staff (role-dependent) are required to:

- ask the participant about appropriate cultural and linguistic protocols
- following the participant's cultural and linguistic protocols
- check with the participant on culturally appropriate ways to reflect and assess current practices
- seek information about how they want to connect with their community
- support participants to make decisions about risks related to cultural, spiritual, or identity-related activities, providing information and support while respecting participants' rights to take informed risks
- not put their own experience, attitudes and beliefs related to identity as 'normal'
- recognise the complexity of working in a cross-culture context and be aware of their judgements and biases affect their behaviour
- understand that they may not be able to perceive the participant's cultural perspective
- support the person to access an interpreter or similar to ensure safe, accurate and meaningful communication
- seek feedback from family and other community members to understand how to build on or adjust current practices
- assist the participant in accessing culturally and linguistically appropriate channels to provide feedback and complaints

3.2 Understanding individual responsiveness - LGBTIQ+ identity

Staff (role-dependent) are required to:

- ask and respect the participant's sexual expression and orientation
- respect and protect the participant's privacy about with whom they share their sexual orientation, gender identity and expression

- ask what is relevant to support sexual orientation, gender identity and expression and respect their right not to provide this information
- ask how to refer to the participant, such as personal pronouns - he
- use inclusive language
- support the participant to connect with chosen community(s) and family and acknowledge them as part of the support team
- not put their own experience, attitudes and beliefs related to identity as 'normal'
- understand that they may not be able to perceive the participant's perspective
- find spaces that are safe for me to explore and share my sexual orientation, gender identity and expression, as required
- connect to community groups and peer networks that can broaden support options and minimise safety risks
- work with the participant to improve experience and confidence in accessing support and service
- check on the preferred way of reflecting and assessing the service provided
- provide support to find and access safe and inclusive channels to raise concerns, complaints and incidents

4.0 Related documents

- Aboriginal and/or Torres Strait Islander Policy and Procedure
- Person-Centred Supports Linkage Policy and Procedure
- Participant Safeguarding Policy
- Privacy and Dignity Policy and Procedure
- Independence and Informed Choice Decision-Making Policy and Procedure
- Reportable Incident, Accident and Emergency Policy and Procedure
- Complaints and Feedback Policy and Procedure
- Participant Handbook
- Participant Information Consent Form
- Participant Information in Easy English
- Staff Training Record
- Staff Training Plan
- Support Plan
- Easy Read - Planning With You
- Training Attendance Register – In House
- Annual Organisational Training Register and Review

5.0 References

- Disability Discrimination Action 1992 (Commonwealth)
- Privacy Act 1988 (Commonwealth)
- Work Health and Safety Act 2011 (Commonwealth)
- Australia's Disability Strategy 2021–2031
- NDIS Practice Standards and Quality Indicators 2021
- NDIS Workforce Capability Framework
- United Nations Convention on the Rights of People with Disabilities
- NDIS (Incident Management and Reportable Incidents) Rules 2018
- National Disability Insurance Scheme Act 2013
- NDIS Quality and Safeguarding Framework

1.3 Privacy and Dignity

Privacy and Dignity Policy and Procedure

1.0 Purpose

The purpose of this policy is to ensure that the privacy, dignity, and personal information of participants are protected at all times during service provision.

Sirian Star Enterprises Pty Ltd is committed to maintaining the confidentiality, autonomy, and human rights of every individual. This includes respecting the personal and sensitive information of participants, communicating clearly about how information is collected, stored and shared, and ensuring informed consent is obtained at all stages.

Our goal is to promote safe, person-centred services where participants are treated with dignity and respect, and where their privacy is actively protected in both written and verbal communications.

2.0 Scope

The policy applies to all staff, contractors, and volunteers of Sirian Star Enterprises Pty Ltd involved in service delivery.

3.0 Policy

Sirian Star Enterprises Pty Ltd is committed to upholding participants' rights to privacy, dignity, and safety in every interaction. We recognise that breaches of privacy may result in harm, distress, or a breakdown of trust. We will ensure that all personal information is handled lawfully, fairly, and respectfully.

We ensure compliance with the NDIS Practice Standards and Quality Indicators (2021), the NDIS Code of Conduct (2018), the NDIS (Incident Management and Reportable Incidents) Rules (2018), the Privacy Act (1988), and the Australian Privacy Principles.

Participants have the right to:

- Know what personal information is collected and why it is collected.
- Access and request correction of their personal records.
- Refuse or withdraw consent to share information, unless required by law.
- Receive information in their preferred format, including Easy Read, visuals, or through interpreters.
- Be informed of and consent to the use of images, recordings, or personal documentation.
- Expect that their information will be kept private, secure, and only accessed by authorised personnel.

To uphold these rights:

- Sirian Star Enterprises Pty Ltd will explain to participants, in a way they understand, how their personal information will be managed.
- Consent will be obtained before collecting, recording, or sharing information, and documented appropriately.
- Where personal information is shared externally (e.g. for referrals or advocacy), participant consent must be recorded in writing.
- Audio or video recordings of participants will not occur without written consent and a clear explanation of how the recordings will be used.
- Staff will receive regular training in privacy obligations, respectful documentation practices, and culturally safe communication.

Sirian Star Enterprises Pty Ltd will use Easy Read documents and communication aids to support participant understanding. Interpreters will be engaged where possible for participants with communication support needs or who prefer to communicate in languages other than English.

All records—whether written, verbal, digital, or visual—will be maintained securely and handled in line with privacy legislation and internal information management procedures.

4.0 Procedure

4.1 Dealing with personal information

In dealing with personal information, Sirian Star Enterprises Pty Ltd staff will:

- ensure privacy for the participants, staff, or management when they are being interviewed or discussing matters of a personal or sensitive nature
- collect and store personal information that is only necessary for the functioning of the organisation and its activities
- use fair and lawful ways to collect personal information
- collect personal information only with consent from the individual
- ensure that people know of the type of personal information collected, the purpose of keeping the information, the method used when information is collected, used or disclosed, and who will have access to the information
- ensure that personal information collected or disclosed is accurate, complete, and up-to-date and provide access to the individual to review information or correct wrong information about themselves
- take reasonable steps to protect all personal information from misuse, loss and unauthorised access, modification or disclosure
- destroy or permanently de-identify personal information no longer needed or after legal requirements for retaining documents that have expired
- ensure that participants understand and agree with the type of personal information being collected and the reason/s for the collection

- ensure participants are advised of any recordings in either audio or visual format. Before collecting material, the participant's involvement in any recording format has been agreed to in writing

Participants have the right to request access to their personal information, request corrections if information is inaccurate or incomplete, and withdraw consent for non-legally required sharing. In the event of a privacy breach or unauthorised disclosure, Sirian Star Enterprises Pty Ltd will:

- Take immediate steps to contain and assess the breach.
- Notify affected individuals where required.
- Comply with obligations under the Notifiable Data Breaches (NDB) scheme of the Privacy Act 1988.
- Review and improve systems to prevent future breaches.

4.2 Participant records

Participant records will be kept confidential and only handled by staff directly engaged in delivering service to the participant. Information about a participant may only be made available to other parties with the consent of the participant, or their advocate, guardian or legal representative. A written agreement providing permission to keep a recording must be stored in the participant's file.

All electronic records will be stored securely in password-protected systems compliant with Australian data protection standards. Staff must not store participant information on personal devices. Any sharing of participant records via email must be encrypted and sent only via secure platforms. All hard copy files of participant records will be kept securely in a locked filing cabinet in the office of the Senior Care Coordinator or Operations Manager.

4.3 Responsibilities for managing privacy

All staff members are responsible for managing personal information to which they have access.

The Operations Manager is responsible for:

- managing and responding to privacy breaches in line with the Privacy Act 1988 and NDIS requirements.
- ensuring privacy risks are considered in risk assessments and participant safeguarding plans.
- ensuring that any privacy complaints are investigated fairly and resolved promptly.

The Operations Manager is responsible for the content appearing in Sirian Star Enterprises Pty Ltd publications, communications, and on our website and must ensure:

- appropriate consent is sought and obtained for the inclusion of any personal information about any individual, including Sirian Star Enterprises Pty Ltd personnel (see Consent Policy and Procedure)

- information provided by other agencies or external individuals conforms to our privacy principles
- our website contains a Privacy Statement that clearly outlines the conditions regarding any collection of personal information from the public captured via their visit to the website

The Operations Manager is responsible for safeguarding personal information relating to Sirian Star Enterprises Pty Ltd's staff, management and contractors. The Operations Manager will be responsible for:

- ensuring that all staff members are familiar with the Privacy Policy and administrative procedures for handling personal information
- providing participants and other relevant individuals with information about their rights regarding privacy and dignity
- handling any queries or complaints about privacy issues

4.4 Privacy information for participants

During the first interview, participants are notified of the following:

- the information being collected about them,
- how their privacy will be protected, and
- their rights concerning this data

Information sharing is part of our legislative requirements. Participants must consent to any information sharing between our organisation and government bodies. The participant is informed they can opt out of any NDIS information sharing during audits.

Participants have the right to refuse or withdraw consent for sharing their information with other agencies, unless sharing is required by law or necessary to prevent harm. Staff must clearly explain participants' options and document their decisions.

4.5 Privacy for interviews and personal discussions

When discussing sensitive topics, staff must ensure the environment is private, safe, culturally appropriate, and trauma-informed. Staff should consider the participant's cultural, linguistic, and identity needs and offer interpreter or support person services as required.

To ensure privacy for participants or staff when discussing sensitive or personal matters, Sirian Star Enterprises Pty Ltd will only collect personal information which is necessary for the provision of support and services and which:

- is given voluntarily
- will be stored securely on the Sirian Star Enterprises Pty Ltd database.

When in possession, or control, of a record containing personal information, Sirian Star Enterprises Pty Ltd will ensure that the record shall be protected against loss, unauthorised access, modification or disclosure by such steps as is reasonable in the circumstances. In cases when a record must be provided to a person in connection with the provision of a service to Sirian Star Enterprises Pty Ltd, everything reasonable will be done to prevent unauthorised use or disclosure of that record.

Sirian Star Enterprises Pty Ltd will not disclose any personal information to a third party without an individual's consent unless that disclosure is required or authorised by, or under, law.

5.0 Related documents

- Code of Conduct Agreement
- Easy Read - Privacy
- Participant Handbook
- Participant Information in Easy English
- Participant Information Consent Form
- Privacy and Confidentiality Agreement
- Staff Handbook
- Staff Training Plan
- Staff Training Record
- Training Attendance Register – In-house
- Consent Policy and Procedure
- Reportable Incident, Accident and Emergency Policy and Procedure
- Advocacy Support Policy and Procedure
- Complaints and Feedback Policy and Procedure
- Management of Data Breach Policy and Procedure

6.0 References

- NDIS Practice Standards and Quality Indicators 2021
- Privacy Act 1988 (Commonwealth)
- Australian Privacy Principles (Commonwealth)
- Notifiable Data Breaches (NDB) scheme — Privacy Act 1988
- National Disability Insurance Scheme Act 2013
- NDIS Code of Conduct Rules 2018
- NDIS (Incident Management and Reportable Incidents) Rules 2018
- NDIS Quality and Safeguarding Framework

Management of Data Breach Policy and Procedure

1.0 Purpose

The purpose of this policy is to ensure that Sirian Star Enterprises Pty Ltd maintains a strong commitment to the privacy, dignity, and confidentiality of participants, staff, and stakeholders. This includes the secure management of personal and sensitive information, and a timely and appropriate response in the event of a data breach.

This policy outlines how potential or confirmed data breaches are identified, investigated, recorded, and reported. It ensures that any breach is addressed in a way that mitigates harm, maintains trust, and supports continuous quality improvement across the organisation.

2.0 Scope

The policy applies to all staff involved in managing, handling, or accessing personal and sensitive information.

3.0 Definitions

Term	Definition
Sensitive Information	Subset of personal information and includes information about an individual's racial or ethnic origin, political opinions, religious beliefs, sexual orientation, health information, or criminal record, as defined under the Privacy Act 1988 (Commonwealth).
Participant Data	Any information relating to participants of the organisation, including but not limited to their NDIS plans, goals, personal circumstances, health records, and other identifying or sensitive information relevant to the delivery of NDIS supports.
Data breach (Eligible data breach)	Unauthorised access to or unauthorised disclosure of personal information or lost personal information in circumstances where unauthorised access to or unauthorised disclosure of the information is likely to occur.
Likely (likely to result in serious harm)	To be interpreted to mean more probable than not
Reasonable person	A reasonable person is a person who is adequately informed based on information immediately available or following reasonable enquiries or an assessment of the data breach.

Term	Definition
	<p>OAIC's guidance states that:</p> <p>The reasonable person is not to be taken from the perspective of an individual whose personal information was part of the data breach or any other person. Generally, entities are not expected to make external enquiries about the circumstances of each individual whose information is involved in the breach.</p>
<p>Likely to result in serious harm</p>	<p>An assessment as to whether an individual is likely to suffer 'serious harm' because of an eligible data breach depends on, among many other relevant matters:</p> <ul style="list-style-type: none"> • the kind and sensitivity of the information subject to the breach. • whether the information is protected and the likelihood of overcoming that protection. • if a security technology or methodology is used concerning the information to make it unintelligible or meaningless to persons not authorised to obtain it - the information or knowledge required to circumvent the security technology or methodology • the persons, or the kinds of persons, who have obtained, or could obtain, the information. • the nature of the harm that may result from the data breach.
<p>Potential forms of serious harm</p>	<p>It could include physical, psychological, emotional, economic and financial harm and harm to reputation.</p>
<p>Remedial action</p>	<p>There are several exceptions to the notification obligation. An entity can take effective remedial action to prevent unauthorised access to or disclose information when lost or prevent any serious harm resulting from the data breach. If an entity takes such remedial action, an eligible data breach will not be taken to have occurred. Therefore, an entity will not be required to notify affected individuals or the OAIC.</p>
<p>Suspicion of an eligible data breach</p>	<p>If the organisation merely suspects that an eligible data breach has occurred, but there are no reasonable grounds to conclude that the relevant circumstances amount to an eligible data breach, we must undertake a "reasonable and expeditious</p>

Term	Definition
	assessment” of whether there are reasonable grounds to believe that an eligible data breach has occurred.
Assessment time frame	Within 30 days after the day, it became aware that the grounds caused it to suspect an eligible data breach.
Personal Information	<p>Personal information includes a broad range of information or opinions that could identify an individual. Personal information will vary depending on whether a person can be identified or identifiable.</p> <p>For example, personal information may include the following:</p> <ul style="list-style-type: none"> ● an individual’s name, signature, address, phone number or date of birth ● sensitive information ● credit information ● staff member record information ● photographs ● internet protocol (IP) addresses ● voiceprint and facial recognition biometrics (because they collect characteristics that make an individual’s voice or face unique) ● location information from a mobile device (because it can reveal user activity patterns and habits)

4.0 Policy

Sirian Star Enterprises Pty Ltd is committed to maintaining high standards of privacy and confidentiality in line with the NDIS Practice Standards (Rights and Responsibilities, Information Management), the NDIS Code of Conduct, and the Privacy Act 1988, including the Australian Privacy Principles and the Notifiable Data Breaches (NDB) Scheme.

A data breach may occur when personal information held by the organisation is lost or accessed, disclosed, or altered without authorisation. Breaches may result from malicious acts (such as cyberattacks), accidental disclosures, or human error. All data breaches are treated seriously, whether or not they are eligible for mandatory reporting to the Office of the Australian Information Commissioner (OAIC).

Sirian Star Enterprises Pty Ltd will:

- Establish a Data Breach Response Team with appropriate expertise and authority.
- Require all staff to immediately report suspected or confirmed breaches to the Operations Manager.
- Investigate the breach within 48 hours using a Data Breach Process Form.
- Assess the potential harm to affected individuals, particularly those with high vulnerabilities or safeguarding needs.
- Where an eligible data breach is confirmed, prepare and submit a statement to the OAIC using the online Notifiable Data Breach Form, including:
 - Contact details for Sirian Star Enterprises Pty Ltd
 - Description of the breach
 - Categories of personal information involved
 - Recommended actions for affected individuals to reduce potential harm
- Notify affected individuals directly by appropriate means (email, phone, letter), or where not practicable, publish the statement on the organisation's website and promote it appropriately.

In all cases, Sirian Star Enterprises Pty Ltd will ensure:

- Participants are informed in a culturally sensitive, trauma-informed, and accessible manner.
- The organisation complies with reporting timeframes (no later than 30 days after becoming aware of the breach).
- Data breach records are maintained securely and reviewed for systemic issues.
- Staff receive regular training on privacy, information handling, and breach prevention.
- Trends and learnings from breaches are used to strengthen our information management systems and support continuous improvement.

Where personal data is jointly held by Sirian Star Enterprises Pty Ltd and another provider, such as through shared services or subcontracting arrangements, responsibility for notification will be determined in accordance with the data-sharing agreement and only one entity is required to report to the OAIC.

4.1 Procedure – Data Breach Response – CCTV System

If a data breach occurs involving CCTV footage or the CCTV system (including unauthorised access, loss, disclosure, or suspected compromise), Sirian Star Enterprises Pty Ltd will:

1. Immediately secure the system to prevent further access or loss.
2. Notify the Operations Manager to assess the breach.
3. Determine the severity and impact of the breach, including whether any participant, visitor, or staff member has been affected.
4. Follow the Sirian Star Enterprises Pty Ltd Management of Data Breach Policy and Procedure, including:

- documenting the breach,
 - containing and investigating the incident,
 - assessing risks, and
 - implementing corrective actions.
5. Notify affected individuals where required and appropriate.
 6. Report the incident to the NDIS Commission if it meets the threshold for a reportable incident under the Incident Management and Reportable Incidents Rules.
 7. Review and improve system security to prevent recurrence.

5.0 Procedure

Participants and/or their guardians/advocates affected by any breach must be consulted, informed, and supported in a trauma-informed, culturally appropriate way during the assessment and response.

Safeguarding concerns identified during breach assessments must be escalated in accordance with the NDIS (Incident Management and Reportable Incidents) Rules 2018 and related safeguarding policies.

5.1 Stage 1. Assess and determine the potential impact

- Once notified of the potential data breach, the Operations Manager must consider whether a privacy data breach has (or is likely to have) occurred and made a preliminary judgement as to its possible severity.
- The appropriate managerial staff should seek advice on managing the data breach.
- Criteria for determining whether a privacy data breach has occurred:
 - Is personal information involved?
 - Is the personal information of a sensitive nature?
 - Has there been either unauthorised access to personal information, unauthorised disclosure of personal information, or loss of personal information in circumstances where access to the information is likely to occur?
- Criteria for determining the severity of the breach:
 - type and extent of personal information involved
 - the number of individuals that have been affected
 - if the information is protected by any security measures (password protection or encryption)
 - type of person/s who now have access
 - whether there is (or could be) a real risk of serious harm to the affected individuals
 - if there could be media or stakeholder attention due to the breach/suspected breach.
- Concerning the above, serious harm could include physical, physiological, emotional, economic/financial or reputation harm, as defined in Section 26WG of the National Data Breach Act.

The Operations Manager and relevant staff will take a preliminary view as to whether the breach (or suspected breach) may constitute a Notifiable Data Breach. Accordingly, the Operations Manager will issue pre-emptive instructions as to whether the data breach should be managed at the local level or escalated to the Data Breach Response Team (Response Team); this will depend on the nature and severity of the breach.

5.2 Stage 2. Select the appropriate data breach management option

If the data breach relates to risks of harm (including abuse, neglect, exploitation), the breach must also be managed in accordance with Sirian Star Enterprises Pty Ltd's Reportable Incident, Accident and Emergency Policy and Procedure and Procedure, with prompt escalation to the NDIS Commission as required

Option 1 - Data breach managed at a local level by managerial staff

1. The Operations Manager will ensure the implementation of immediate corrective action if this has not already occurred. Corrective action may include retrieving or recovering personal information, ceasing unauthorised access, and shutting down or isolating the affected system.
2. A Data Breach Process Report must be completed within 48 hours of receiving instructions. The report will contain a:
 - description of the breach or suspected breach
 - summary of action taken
 - summary of outcomes from the action taken
 - outline of processes implemented to prevent a repeat situation
 - the recommendation that outlines why no further action is necessary
3. The Operations Manager will sign off, confirming that no further action is required.

Option 2 - Data breach managed by the Data Breach Response Team

1. When the Operations Manager instructs that the data breach be escalated to the Response Team, the Operations Manager will convene the Response Team and notify any relevant managerial staff.
2. The Response Team will consist of the following:
 - Operations Manager
 - Human Resource nominee
 - Information Technology nominee
 - Marketing and external relations nominee
 - Other people nominated by the Operations Manager

5.2.1 Primary role of the Data Breach Response Team

There is no single method of responding to a data breach. Each incident must be dealt with case-by-case by assessing the circumstances and associated risks to inform the appropriate course of action. The following steps may be undertaken by the Response Team, as appropriate:

1. Immediately contain the breach if this has not already occurred. Corrective action may include retrieving or recovering personal information, ceasing unauthorised access, and shutting down or isolating the affected system.
2. Evaluate the risks associated with the breach, including collecting and documenting all available evidence regarding the above information.
3. Call upon the expertise of, or consult with, relevant staff members in specific circumstances.
4. Engage independent cybersecurity or a forensic expert, as appropriate.
5. Assess whether serious harm is likely (with reference above and Section 26WG of the National Data Breach Act).
6. Recommend to the Operations Manager whether this breach constitutes an NDB for mandatory reporting to the OAIC and the practicality of notifying affected individuals.
7. Consider developing a communication or media strategy, including the timing, content and method of any announcements to participants, staff members or the media.
8. The Response Team must undertake its assessment within 48 hours of being convened.

5.2.2 Secondary role of the Data Breach Response Team

Once the data breach has been dealt with appropriately, the Response Team should turn its attention to the following steps:

1. Identify lessons learnt and remedial action that can be taken to reduce the likelihood of a recurrence; this may involve a review of policies, processes and refresher training.
2. Prepare a report for submission to senior management.
3. Consider conducting an audit to ensure that the necessary outcomes are affected and effective.

5.3 Stage 3. Notify the Office of the Australian Information Commissioner

- Considering the Response Team's recommendation, the Operations Manager will determine whether there are reasonable grounds to suspect that a Notifiable Data Breach has occurred.
- If there are reasonable grounds, the Operations Manager must prepare a prescribed statement and provide a copy to the OAIC as soon as practicable (and no later than 30 days after becoming aware of the breach or suspected breach). In addition to OAIC notification, participants affected by the breach must be provided with clear, accessible, and culturally appropriate communication about the breach, its impacts, and steps taken to protect them.

This includes offering additional support or referrals where needed (e.g., advocacy, counselling)

6.0 Related documents

- Staff Training Record
- Staff Training Plan
- Data Breach Process Form
- Reportable Incident, Accident and Emergency Policy and Procedure
- Complaints and Feedback Policy and Procedure
- Advocacy Support Policy and Procedure
- Privacy and Dignity Policy and Procedure
- Consent Policy and Procedure
- Information Management Policy and Procedure

7.0 References

- NDIS Practice Standards and Quality Indicators 2021
- Privacy Act 1988 (Commonwealth)
- Privacy Amendment (Notifiable Data Breaches) Act 2017 (Commonwealth)
- NDIS Code of Conduct Rules 2018
- NDIS (Incident Management and Reportable Incidents) Rules 2018
- NDIS Act 2013 (Commonwealth)
- NDIS Quality and Safeguarding Framework
- Privacy Amendment (Notifiable Data Breaches) Act 2017 (Commonwealth) — keep included
- Australia's Disability Strategy 2021–2031

1.4 Independence and Informed Choice

Independence and Informed Choice Decision-Making Policy and Procedure

1.0 Purpose

The purpose of this policy is to ensure that all participants of Sirian Star Enterprises Pty Ltd are supported to make their own decisions, exercise choice and control, and build their independence in a way that is meaningful to them.

This includes making informed decisions about the services and supports they access, how they are delivered, and who delivers them. The policy promotes respect for individual autonomy, freedom of expression, and the dignity of risk.

It also guides staff on how to support decision-making in a way that builds confidence, encourages self-determination, and ensures participants are never excluded from decisions about their lives.

2.0 Scope

The policy applies to all staff involved in supporting participants at Sirian Star Enterprises Pty Ltd.

3.0 Policy

Sirian Star Enterprises Pty Ltd is committed to upholding the rights of participants to make decisions about their lives. This includes decisions about their daily activities, personal goals, support needs, and lifestyle choices.

In accordance with the NDIS Practice Standards, NDIS Code of Conduct, and Article 12 of the United Nations Convention on the Rights of Persons with Disabilities, we will support participants to make decisions independently, and ensure their will and preferences are respected.

All participants are presumed to have decision-making capacity unless there is clear evidence to the contrary. Decision-making capacity will not be judged based on appearance, communication style, or any decision that might be considered unwise.

Staff will support participants through person-centred, culturally safe, and trauma-informed decision-making processes that may include:

- Providing accessible information, including Easy Read, verbal explanations, or visual aids
- Supporting the participant to explore options and understand consequences
- Allowing adequate time for decision-making
- Respecting the participant's values, beliefs, and cultural identity

- Encouraging family or advocate involvement where appropriate
- Referring to independent advocacy or decision-making support services if needed

Where a participant may be at risk or appears to lack decision-making capacity in a specific situation, Sirian Star Enterprises Pty Ltd staff must:

- Apply a supported decision-making approach as the first step
- Ensure substitute decision-making is used only as a last resort, and only in line with applicable legal frameworks
- Involve the participant as much as possible in the process
- Document all decisions, assessments, and actions taken clearly and sensitively
- Consult with the participant's family, carers, or appointed guardian where appropriate

Participants will never be excluded from decisions relating to their lives without appropriate safeguards and legal authority. Informed consent will be obtained before any support is delivered, and participants may withdraw or change their decisions at any time.

The Operations Manager is responsible for assigning appropriately trained staff to support participants in assessing capacity and facilitating decision-making where required.

Sirian Star Enterprises Pty Ltd will always uphold participants' dignity of risk and will only intervene to prevent significant harm in accordance with our safeguarding, incident management, and risk management policies.

4.0 Definitions

Term	Definition
Decision-making	Process of identifying and choosing alternatives based on the decision-maker's values, preferences, and beliefs.
Supported Decision-Making	Process of providing support to a person to enable them to make their own decisions, rather than having others decide on their behalf.
Informed choice	A person chooses services based on diagnostic tests or treatments, knowing the details, benefits, risks and expected outcomes.
Informed Consent	When a person agrees to something after having received all relevant information in a way they understand, including risks, benefits, and alternatives, and without any coercion

Term	Definition
Capacity	Capacity is decision specific – it depends on the particular decision being made. Everyone has the right to make their own decisions or have the right to have support to make their own decisions. In some situations, this right must be balanced against the need to protect a person who cannot make a particular decision from harm to themselves or from exploitation by others.
Dignity of Risk	The dignity of risk is the right to take risks when engaging in life experiences and the right to fail in taking these.
Advocate	An Advocate is a person who puts a case on someone else's behalf.
Autonomy	The capacity to decide for oneself and pursue a course of action in one's life, often regardless of moral content.

5.0 Procedure

5.1 Advocate

Sirian Star Enterprises Pty Ltd will inform all participants from their first contact with Sirian Star Enterprises Pty Ltd that they have the right to access an advocate (including an independent advocate) of their choosing. They will be advised that it is their right to have the advocate present whenever they contact Sirian Star Enterprises Pty Ltd.

Participants will be informed of their right to access independent advocacy services, including referral to the National Disability Advocacy Program (NDAP) or Disability Advocacy Finder.

5.2 Decision-making and choice

During the development of the service agreement and all ongoing interactions with each participant, Sirian Star Enterprises Pty Ltd staff must:

- always assume that the participant can undertake decisions
- inform the participants, and their advocate, of their options regarding their supports
- advise the participants, and their advocate, of any risks to themselves or others regarding their options
- consult and collaborate with the participant, and their advocate, by providing current and relevant information to allow the participant to make decisions
- allow the participant enough time to absorb and understand all relevant information before and during the decision-making process

- provide information in an Easy Read format
- assess the participant's service requirements against their NDIS plan, plan and provide proper support and design appropriate strategies with the participant, family and advocate
- undertake review meetings where the participant, family and advocates have input
- plan with the participant, family and advocates when the participant decides to exit from Sirian Star Enterprises Pty Ltd

The support plan development incorporates input from participants and their relevant networks. Each supported service requires the participant to be part of the decision-making process. Sirian Star Enterprises Pty Ltd will:

- accept all decisions made unless there is a risk to the health and safety of the participant. In these cases, then Operations Manager or their delegate will:
 - inform the participant that if they wish to continue, it is their choice
 - undertake a risk assessment for the support (e.g. Risk Assessment Form – High-Risk Activity or Event)
 - consult with the participant and their relevant networks about the potential risks
 - discuss the participant's dignity of risk
 - create a risk management plan related to their activity choice
 - record details of discussion and outcome in the support plan
- identify any lifestyle risk factors as per the Lifestyle Risk Factors Policy and Procedure
- create an emergency plan (Emergency and Disaster Management Policy and Procedure), test and adjust the plan in consultation with the participant
- train and inform staff on the support plan strategies and documentation
- allow staff access to the support plan so they can undertake strategies and inform participants when questioned

Sirian Star Enterprises Pty Ltd recognises that participants have the right to dignity of risk in their decision-making. Participants will be advised of the following:

- various relevant options that may support their needs before any decisions are made
- benefits of each relevant option
- risk, if any, linked to each relevant option

Participants will be provided time to absorb information and make the appropriate decisions based on the risks involved.

Where a participant chooses an option that involves risk, staff must:

- Respect the participant's right to take risks and make their own decisions (dignity of risk).
- Conduct a risk assessment in collaboration with the participant and their support network.
- Support the participant to understand risks and strategies to mitigate harm.

- Refer to safeguarding policies if the decision may lead to serious harm, abuse, or neglect.

All decision-making support will be provided using culturally appropriate and trauma-informed practices, respecting the participant's background, identity, and communication needs.

5.3 Autonomy

All participants have the right to autonomy, and all staff will respect this. Participants can make decisions for themselves and pursue the actions that they determine. Participants have the right to choose who they are and what they want to do. Front-line workers must allow the participant their right to intimacy and sexual expression (in the context of lawful behaviour).

Staff will respect and uphold participants' rights to autonomy and personal relationships, as per the NDIS Practice Standards (Rights and Responsibilities) and NDIS Code of Conduct.

5.4 Time

Sirian Star Enterprises Pty Ltd recognises that the participant may require time to make some decisions so they can review the various options available to them. Participants may also need to seek advice from their networks and relevant stakeholders.

Staff must not rush participants during the support provision and decision-making process. Staff must ensure that participants are not rushed when making important decisions, including during assessments, service reviews, and goal planning. Staff must use plain language or Easy Read information and offer support to understand complex information.

5.5 Documentation

Sirian Star Enterprises Pty Ltd requires staff to record all information and options provided to each participant. Decisions will be recorded in the participant's file. Staff must obtain participant consent regarding how their decisions are documented and who may access that information. Staff should respect participants' preferences for privacy and sensitivity.

6.0 Related documents

- Access to Supports Policy and Procedure
- Easy Read - Your Rights
- Responsive Support Provision and Support Management Policy and Procedure
- Risk Management Plan Register
- Service Agreement
- Support Plan
- Support Planning and Service Agreement Collaboration Policy and Procedure
- Transition or Exit Policy and Procedure
- Participant Information Consent Form
- Reportable Incident, Accident and Emergency Policy and Procedure
- Participant Safeguarding Policy
- Consent Policy and Procedure
- Information Management Policy and Procedure

7.0 References

- NDIS Practice Standards and Quality Indicators 2021
- United Nations Convention on the Rights of Persons with Disabilities

1.5 Violence, Harm, Neglect, Exploitation and Discrimination

Violence, Harm, Abuse, Neglect, Exploitation and Discrimination Policy and Procedure

Important note: Information regarding our organisation reporting harm or risk of harm against children refer to the Working with Children Policy and Procedure.

1.0 Purpose

The purpose of this policy is to safeguard participants from all forms of violence, harm, abuse, neglect, exploitation and discrimination, and to ensure a safe, respectful and inclusive environment for all people receiving support.

Sirian Star Enterprises Pty Ltd aims to provide supports and services that are trauma-informed, culturally safe, and responsive to the diverse needs and experiences of participants. We are committed to early identification of risk and to ensuring staff have clear, confident guidance when responding to concerns or disclosures of harm.

The policy is designed to promote prevention, ensure timely action when risks arise, and uphold the rights of participants to dignity, safety, choice and control, especially where vulnerability due to disability, age or circumstance increases the likelihood of harm.

2.0 Scope

The policy applies to all staff involved in delivering services or interacting with participants, including children, young people, and adults with disabilities.

3.0 Definitions

Term	Definition
Safeguarding	Actions and practices that ensure people with disability are safe from harm, abuse, exploitation, neglect, and violence while respecting their dignity and rights
Dignity of Risk	The right of individuals to make their own choices and take risks that may involve failure or harm, as part of living an independent and fulfilling life
Abuse and neglect	Any behaviour outside the norms of conduct entails a substantial risk of causing physical or emotional harm to a person. Such

Term	Definition
	behaviours may be intentional or unintentional and can include acts of omission (i.e. neglect) and commission (i.e. abuse).
Discrimination	Discrimination is treating or proposing to treat someone unfavourably because of a personal characteristic protected by the law, including bullying someone because of a protected characteristic.
Exploitation	Exploitation is the action or fact of mistreating someone to benefit from their work or the action of making use of and benefiting from resources.
Violence	Violent behaviour by a person towards another can include abusive behaviour that is physical, sexual, intimidating and forceful.
Harm	Harm will be taken to be a reference to physical harm or psychological harm (whether caused by any act or omission) and includes such harm caused by sexual, physical, mental or emotional abuse or neglect.

3.1 Types of abuse

Term	Signs and symptoms	Causes
Physical harm	Bruising, lacerations, welts, rashes, broken or healing bones, burns, weight loss, facial swelling, missing teeth, pain or restricted movements, crying, acting fearful, agitation, drowsiness, hair loss or poor physical well-being.	Hitting, slapping, pushing, punching or burning entails an incident that is non-accidental, resulting in pain or injury.
Psychological/ emotional harm	Loss of interest in self-care, helplessness, withdrawal, apathy, insomnia, fearfulness, reluctance to communicate openly, choosing not to maintain eye contact, paranoia and confusion.	Intimidation, humiliation, harassment, threatening, sleep deprivation, withholding affection, or not allowing them to maintain their decision-making powers leads to a repeated pattern.

Term	Signs and symptoms	Causes
Sexual abuse	knowing more about sexual activities than other children their age, playing sexually, masturbating more than what's typical for their age and stage of development, refusing to undress for activities or wear additional layers of clothing, having bruising, bleeding, swelling, tears or cuts on their genitals or anus, having unusual vaginal odour or discharge, having itching or pain in the genital area, difficulty going to the toilet, walking or sitting, having a sexually transmitted disease or urinary tract infection, having torn, stained or bloody clothing, especially underwear, being afraid of being alone with a particular person or going to a particular place, becoming withdrawn, unusually reactive or begins displaying high-risk behaviours (including substance misuse), being frequently depressed, feel suicidal or attempt suicide, creating stories, poems or artwork about abuse, Having problems sleeping or starts having nightmares, Starting to wet the bed or soil themselves.	The involvement of dependent, developmentally immature children and adolescents in sexual activities which they do not fully comprehend, are unable to give informed consent to and that violate social taboos of family roles.
Neglect	Neglect is poor hygiene or personal care, unkempt appearance, lack of personal items, absence of health aids,	Neglect is the intentional failure to provide basic life necessities.

Term	Signs and symptoms	Causes
	weight loss, agitation, inappropriate clothing or lack of food.	
Domestic and family abuse	Any controlling, bullying, threatening or violent behaviour between people in a relationship, including emotional, physical, sexual, financial or psychological abuse.	Many experts believe in psychopathology. Witnessing abuse as the norm, or being abused, destroys the child's ability to trust others and undermines their ability to control emotion.
Financial harm	Unexplained money loss, lack of money to pay for essentials such as rent, bills and food, Inability to access or check bank accounts and bank balance, changes or deterioration in standards of living, e.g. not having items or things they would usually have, Unusual or inappropriate purchases in bank statements, Isolation and withdrawal from friends and family, Lack of things you'd expect someone to be able to afford, e.g. TV, grooming items, clothing	Financial abuse is when someone takes away access to money, manipulates their financial decisions, or uses their money without consent. It occurs when someone uses money or things relating to money to hurt, scare or control someone.
Grooming	Being very secretive about how they're spending their time, including when online, having money or new things like clothes and mobile phones that they can't or won't explain, depression and or anxiety, underage drinking or drug taking.	Grooming is when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them.

4.0 Policy

Sirian Star Enterprises Pty Ltd is committed to preventing and responding to all forms of violence, abuse, neglect, exploitation and discrimination. This includes promoting a culture where harm is never tolerated, participants' rights are respected, and concerns are taken seriously and acted upon promptly.

All actions under this policy are guided by the NDIS Practice Standards, the NDIS Code of Conduct, the NDIS Quality and Safeguarding Framework, and the NDIS (Incident Management and Reportable Incidents) Rules 2018.

Sirian Star Enterprises Pty Ltd adopts a zero-tolerance approach and will:

- Take preventative, proactive and inclusive measures to identify and reduce risks of harm
- Respond to all disclosures, signs or suspicions of abuse with urgency, compassion, and adherence to mandatory reporting obligations
- Ensure all staff receive ongoing training in participant safeguarding, trauma-informed care, culturally responsive practice, and professional boundaries
- Support participants to express concerns, understand their rights, and access advocacy, complaint and protective pathways
- Prioritise safety over convenience, and dignity over risk aversion
- Immediately report serious concerns to emergency services (Police on 000), and to relevant state-based child protection or adult safeguarding authorities
- Treat harm, abuse and neglect as reportable incidents under the *Reportable Incident, Accident and Emergency Policy and Procedure*
- Share information lawfully and ethically to ensure participant safety, in line with privacy and confidentiality obligations
- Work with families, carers and advocates in a respectful and inclusive way that places participant safety and wishes at the centre

Common risks for participants may include, but are not limited to:

- Domestic and family violence
- Physical, sexual or emotional abuse
- Neglect of basic needs
- Exploitation (including financial or labour-related)
- Discrimination based on disability, culture, gender identity or other attributes

Where participants choose to disclose past or current abuse, our staff will respond with belief, support, and trauma-informed care. All actions will be documented and reviewed as part of our commitment to continuous improvement.

4.1 Statement of commitment to safety

Sirian Star Enterprises Pty Ltd is committed to the safety and well-being of all participants. This commitment is the primary focus of our support and decision-making. Sirian Star Enterprises Pty Ltd is committed to providing a safe environment where participants are safe and their voices are heard and included in decisions that affect their lives. Attention is paid to the cultural safety of participants from culturally or linguistically diverse backgrounds.

All staff members are responsible for understanding the critical and specific role they play, individually and collectively, to ensure the well-being and safety of all participants, and young people are at the forefront of all they do and every decision they make.

4.2 Safe Code of Conduct

Sirian Star Enterprises Pty Ltd is committed to the safety and well-being of participants. Our business recognises the importance of, and responsibility for, ensuring our environment is a safe, supportive and enriching environment that respects and fosters the dignity and self-esteem of all people, enabling them to thrive.

The Safe Code of Conduct protects our employees and participants and reduces abuse or harm opportunities. It also assists in understanding how to avoid or better manage risky behaviours and situations. It is intended to complement child protection legislation, disability legislation, policies and procedures, and professional standards and codes of ethics that apply to all staff.

The Safe Code of Conduct must be read alongside the NDIS Code of Conduct and Sirian Star Enterprises Pty Ltd's Zero Tolerance Policy. All staff must comply with their obligation to report any incident of abuse, neglect, violence, exploitation, and discrimination immediately.

Sirian Star Enterprises Pty Ltd management supports implementing and monitoring the Code of Conduct. We will plan, implement and monitor arrangements to provide inclusive and safe environments.

All staff, volunteers, and other community members involved in participant-related work must comply with the Code of Conduct by observing appropriate and acceptable behaviour (see '4.3 Acceptable behaviours' below). The Code of Conduct applies in all situations, including planned activities, digital technology, and social media.

4.3 Acceptable behaviours

Staff or any other persons involved with participant-related work are responsible for supporting and promoting the safety of participants by:

- upholding Sirian Star Enterprises Pty Ltd's Statement of Commitment for the participant's safety

- treating the participant, their family and advocates with respect within the environment and during outside activities as part of everyday social and community activities
- listening and responding to the participant's views and concerns, particularly if:
 - they are reporting that they or another person have been abused; or
 - that they are worried about their safety or the safety of another participant
- promoting cultural safety, participation and empowerment of Aboriginal and Torres Strait Islander people through interactions with their community leaders and members
- promoting the cultural safety, participation and empowerment of people with culturally or linguistically diverse backgrounds through engagement with the community accessing the service
- promoting the safety, participation and empowerment of people with disabilities
- reporting any allegations of harm, risk of harm and abuse or personal safety concerns to management, who must contact the relevant state authority (for children, see Working with Children Policy and Procedure)
- understanding and complying with all reporting or disclosure obligations (including mandatory state reporting) as they relate to protecting the participant from harm or abuse
- maintaining the right to live in a safe environment by promoting and informing the participants of their rights
- ensuring participants are safe and protected from harm as quickly as possible once harm, risk of harm or abuse is suspected
- identifying themselves to the participant upon entering the premises and showing any required identification

4.4 Unacceptable behaviours

As front-line workers, volunteers and community members involved in participant-related work, our staff will not:

- ignore or disregard any concerns, suspicions or disclosures of abuse
- develop a relationship with any participant that could be viewed as favouritism or grooming behaviour, e.g. offering gifts
- exhibit behaviours, or engage in activities with participants that can be interpreted as abusive, harmful and unjustifiable in an educational, therapeutic or service delivery context
- ignore behaviours by other adults toward young participants when they are overly familiar or inappropriate
- discuss the content of an intimate nature or use sexual innuendo with participants, except where it occurs relevantly in the context of parental/advocate guidance or a therapeutic setting
- treat a participant unfavourably because of their disability, age, gender, race, culture, vulnerability, sexuality or ethnicity
- communicate directly with an underage participant through personal or private contact channels, e.g. social media, email, instant messaging or texting, except where that

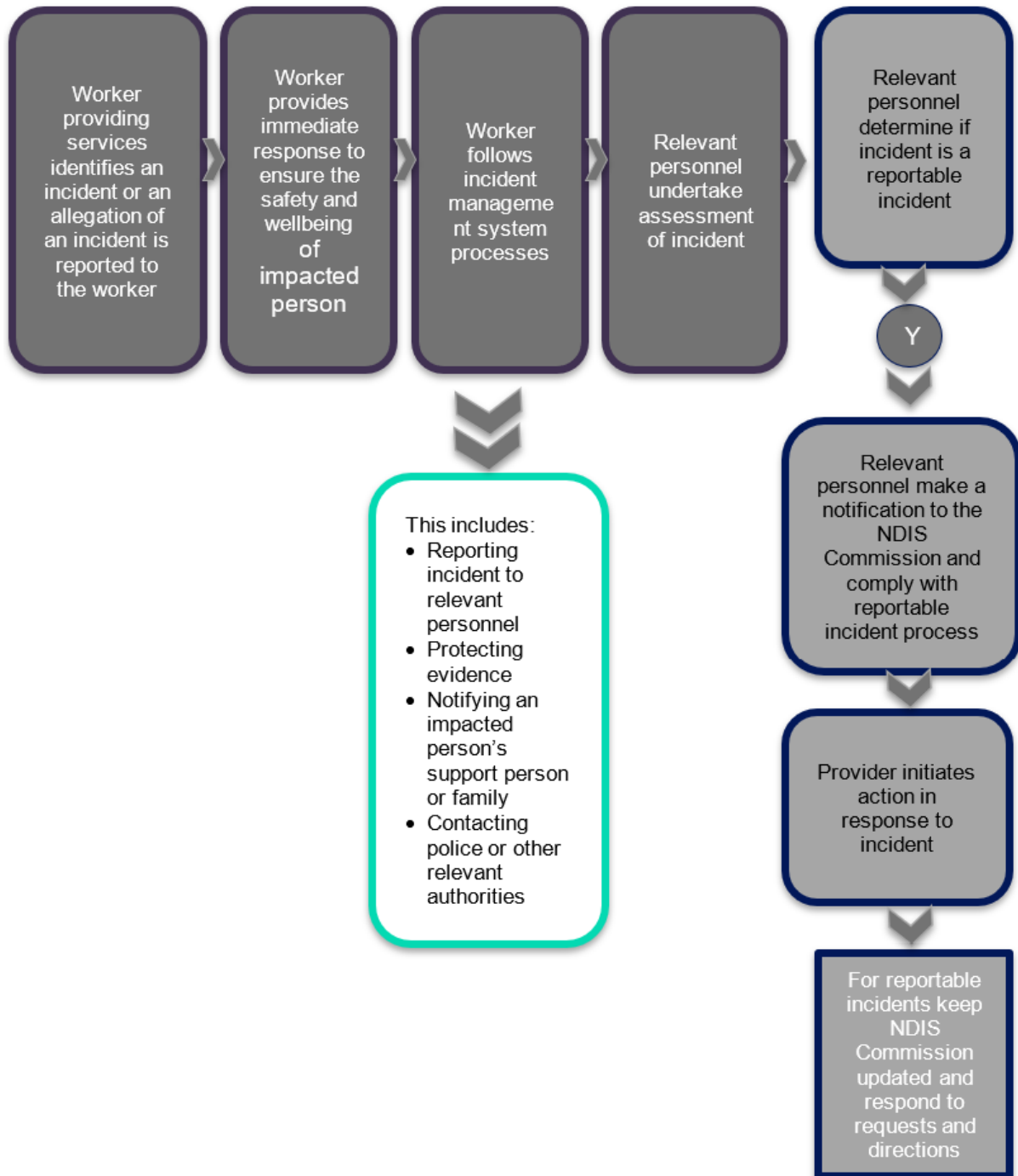
communication is reasonable in all the circumstances related to work or activities, safety concerns or other urgent matters

4.5 Screening, supervising, training and human resource practices to reduce risk

Our staff will be required to undertake disability worker checks, relevant police, working with children checks and the mandatory NDIS Worker Orientation Module. All records will be maintained in their personnel file.

5.0 Procedure

Figure 1 Steps in Incident Management (Incident Management Systems – detailed guidance for NDIS Providers June 2019. Please note: any harm or reasonable suspicion of harm, abuse or neglect to children must be reported to the state authorities (see Working with Children Policy and Procedure).



5.1 Strategies to identify and reduce or remove the risk of harm

Sirian Star Enterprises Pty Ltd recognise that creating a safe organisation begins with a clear understanding of the potential risks to the participant and staff in our organisation’s setting. Sirian Star Enterprises Pty Ltd will identify possible issues and problems and plan to reduce or remove these risks. Risk identification will include consideration of cultural, linguistic, and trauma-informed needs of participants, including Aboriginal and Torres Strait Islander participants, CALD backgrounds, and people with complex needs.

To reduce the likelihood of harm, Sirian Star Enterprises Pty Ltd will consider, define and act against its organisational risks. These strategies include:

- considering the organisation, activities and services provided to participants
- reviewing and planning how to make all activities as safe as possible
- developing a safety plan for participants who require additional supports
- supporting participants with disabilities to understand plans and safety procedures using appropriate communication methods
- informing participants that they have the right to live in a safe environment
- acting proactively to reduce the likelihood of any risks

5.2 Reporting violence, abuse, neglect, exploitation and discrimination

A report must be made if:

- a participant shows a change in behaviour or mood, which may indicate they are being abused
- someone is observed behaving toward a participant in a way that makes others feel uncomfortable
- a participant advises another person is abusing them
- a person advises that they are abusing another participant
- a participant or visitor informs that they have observed abusive or harmful acts
- a participant advises that they feel discriminated against, e.g. language and actions
- a participant presents as unkempt or seeking food
- there is evidence of unexplained bruising or similar
- an action or inaction is witnessed that may be considered abusive, harmful or at risk of harm
- when an individual, for any reason, believes a participant is being abused

Any person making a report of harm, abuse, or neglect is protected from retaliation under Sirian Star Enterprises Pty Ltd's Whistleblower Protection Policy. Reports can be made anonymously if preferred. Staff have a duty of care to report concerns under NDIS obligations.

Failure to report an abusive, harmful or risk of harm situation may result in a criminal offence. Reporting procedure below relates to the following:

- abuse or neglect of a person with a disability (including harm and risk of harm for those under 18s)
- unlawful sexual or physical contact with, or assault of, a person with a disability
- sexual misconduct, committed against, or in the presence of, a person with a disability, including grooming for sexual activity
- Unauthorised use of restrictive practices to a person with a disability

5.3 Assault identification and response

Step 1. Identified potential or real risk of harm to a participant

- Inform management of the identified or actual risk of violence, abuse, neglect, exploitation and discrimination.
- If a real risk has occurred, Sirian Star Enterprises Pty Ltd will follow the reporting procedure listed below in 5.4 How to report (for more information, refer to the Reportable Incident, Accident and Emergency Policy and Procedure listed below).
- Steps 2 to 4 (below) will be followed as part of our prevention strategies if a real risk has not occurred.

Step 2. Response to a potential or real risk of harm to a participant

- Delegated management officer will contact the police or governing state body, or in case of emergency, we will call 000 (follow the reportable incident process listed below)
- Support the participant by offering to contact relevant support persons (e.g. family member or advocate)
- If the risk of harm has not occurred, then management should review the Incident Report and determine prevention strategies

Step 3. Documentation

- Reporting staff member to complete the Incident Report.
- The Operations Manager will complete the Incident Investigation Form and the Incident Investigation Form Final Report (as required).

Step 4. Follow up

- The Operations Manager will check on the participant after the event to ensure they receive any required support.
- Sirian Star Enterprises Pty Ltd will review our incident management system to identify if any additional preventative measures could be introduced to improve organisational practices.
- Sirian Star Enterprises Pty Ltd will train our staff as required to prevent harm to the participant.

5.4 Reporting roles

The organisation will establish the following roles and ensure that allocated staff are aware of their responsibilities:

1. Approved Reportable Incident Approver responsibilities:
 - the authority to review reports before submission to the NDIS Commission.
 - submits new reportable incidents.
 - views previous reportable incidents submitted by their organisation.

2. Authorised Reportable Incidents Notifier responsibilities:
 - supports the Authorised Reportable Incident Approver to collate and report the required information.
 - creates new reportable incident notifications to be saved as a draft for review and submission by the Authorised Reportable Incident Approver.
3. Mandated notifier responsibilities for children (see Working with Children Policy and Procedure).

5.5 How to report

The Senior Care Coordinator will review the information and contact the police immediately to inform them of the suspected abuse.

For Module 2A implementing providers, unauthorised use of a restrictive practice constitutes a reportable incident. The provider must notify the NDIS Commission within five business days of becoming aware of the use.

Reportable incidents are submitted via the NDIS Commission Portal - [My Reportable Incidents](#) page as follows:

1. Complete an Immediate Notification Form and submit it within 24 hours:
 - Approved Reportable Incident Notifier will create for approval.
 - Approved Reportable Incident Approver will approve and submit.

Note: Approved Reportable Incident Notifier may create and submit as required by the circumstance of the incident. The participant's valid NDIS Number must be entered.

2. The 5-day Form is to be completed within five days of key stakeholders being informed of an incident:
 - Approved Reportable Incident Notifier will create a form for approval.
 - Approved Reportable Incident Approver will approve and submit.

Note: Approved Reportable Incident Notifier may create and submit as required by the circumstance of the incident.

3. A final report will be submitted if requested by the NDIS Commission.
 - Approved Reportable Incident Notifier will create for approval.
 - Approved Reportable Incident Approver will approve and submit.

Note: Approved Reportable Incident Notifier may create and submit as required by the circumstance of the incident.

5.5.1 Timeframes for notifying the NDIS Commission about reportable incidents

When a reportable incident occurs or is alleged in connection with the NDIS supports or services you deliver, you must notify us using the [NDIS Commission Portal](#) within the required timeframes (set out below). The timeframes are calculated from when a registered NDIS provider became aware that the incident occurred or was alleged to have occurred.

Reportable incident	Required timeframe
death of a person with disability	24 hours
serious injury of a person with disability	24 hours
abuse or neglect of a person with disability	24 hours
unlawful sexual or physical contact with, or assault of, a person with disability	24 hours
sexual misconduct committed against, or in the presence of, a person with disability, including grooming of the person for sexual activity	24 hours
the use of the restrictive practice to a person with disability if the use is not following a required state or territory authorisation and/or not under a behaviour support plan	Five business days

5.6 Details to provide

The Operations Manager or their delegate will give the following information to the authorities:

- participant's name, age, date of birth and address
- description of injury, harm, risk of harm, abuse and neglect (outline current and previous)
- participant's current situation
- location of the participant and alleged perpetrator, if known
- explanation of when and how harm, risk of harm or abuse was discovered and by whom.

Note: NDIS forms must be submitted to the NDIS Commission. The required police contact will also use the above information if investigating an incident.

5.7 Investigating allegation or incident

An investigation is guided by relevant authorities such as the Police, NDIS and state reporting body for children (refer to Working with Children Policy and Procedure) to ensure that the internal investigation does not inadvertently affect the outcome of their investigation.

The Operations Manager and/or Senior Care Coordinator undertakes a review of the allegation or incident by:

- gathering data from the relevant person/s
- analysing the situation to determine what occurred, how it occurred, and the parties involved
- determining the effect on the participant/s
- consulting with relevant stakeholders; never seek information that may guide the participant, as this requires a specialist. Appropriate authorities will conduct any questioning once the incident is reported
- informing the participant or their family that they have access to a support advocate
- reviewing the outcome against practices
- undertaking action to prevent the incident from being repeated

5.8 Support the participant

Reported allegations or incidents require the Operations Manager to gather all the relevant information and make a report to the relevant authority, such as the police or via each state's reporting process.

Support will be provided to the participant relevant to the allegation or incident. The participant will be provided with an appropriate advocate if required.

5.9 Documentation

- Record all allegations and incidents in the Incident Register.
- Complete the Incident Report and Incident Investigation Form
- Complete the Incident Investigation Form, if required.
- All reports are to be included in the participant's file.
- Complete the Immediate Notification Form and 5-Day Form, and NDIS Report, as required.
- Maintain records for seven years.

6.0 Related documents

- Authority to Act as an Advocate Form
- Code of Conduct Agreement
- Incident Investigation Form
- Incident Investigation Form Final Report
- Incident Report
- Incident Register
- Participant Notes
- Risk Assessment Form
- Risk Management Plan Register
- Staff Training Record
- Staff Training Plan
- Training Attendance Register – In-house
- Annual Organisational Training Register and Review
- Reportable Incident, Accident and Emergency Policy and Procedure
- Working with Children Policy and Procedure
- Zero Tolerance Policy and Procedure
- Participant Safeguarding Policy
- Privacy and Dignity Policy and Procedure
- Complaints and Feedback Policy and Procedure

7.0 References

- NDIS (Incident Management and Reportable Incidents) Rules 2018
- NDIS Practice Standards and Quality Indicators 2021
- The National Framework for Protecting Australia's Children
- United Nations Convention on the Rights of the Child 1989
- NDIS Code of Conduct (2018)
- NDIS Quality and Safeguarding Framework
- National Disability Insurance Scheme Act 2013 (Commonwealth)
- Australia's Disability Strategy 2021–2031

Participant Safeguarding Policy

1.0 Purpose

The purpose of this policy is to ensure that all participants supported by Sirian Star Enterprises Pty Ltd are safe, respected, and empowered to make their own decisions, while exercising choice, control and the dignity of risk.

Sirian Star Enterprises Pty Ltd recognises that safeguarding is not only about protecting individuals from harm, but also about promoting independence, autonomy, and access to community life on equal terms. This includes ensuring the environment, relationships and services provided are trauma-informed, culturally safe, and inclusive of participants' identity, goals, and experiences.

Our safeguarding approach is designed to:

- Strengthen how we support people with disability, their families, and their informal support networks to create, maintain, or strengthen safeguards.
- Improve our capacity to proactively identify, assess, and respond to risks of harm or exploitation.
- Define clear roles and responsibilities within our organisation regarding participant safeguarding.
- Ensure accessible safeguarding resources and communication for both participants and staff.

2.0 Scope

This policy applies to all staff and others providing services or support to participants on behalf of Sirian Star Enterprises Pty Ltd.

3.0 Policy

Sirian Star Enterprises Pty Ltd is committed to providing services in a way that ensures participants are safe from harm and are supported to build safeguards that reflect their values, goals, and individual needs. We recognise safeguarding as a shared responsibility between the organisation, staff, the participant, their informal supports, and the broader community.

All safeguarding actions will be guided by the following national frameworks and requirements:

- NDIS Practice Standards and Quality Indicators 2021
- NDIS Code of Conduct 2018
- NDIS Quality and Safeguarding Framework
- NDIS (Incident Management and Reportable Incidents) Rules 2018

Sirian Star Enterprises Pty Ltd adopts a zero-tolerance approach to all forms of violence, abuse, neglect, exploitation and discrimination.

We are guided by the six key principles outlined in the NDIS Safeguarding Framework:

1. **Safety culture** – promoting open communication, accountability, and transparency
2. **Empowerment** – enabling participants to speak up and take control
3. **Individual circumstances** – tailoring safeguards to participant needs and context
4. **Proactive support** – implementing safeguarding actions before harm occurs
5. **Dignity of risk and informed decision-making** – supporting autonomy while managing risk
6. **Informal support networks** – recognising the importance of trusted relationships in safety

To uphold these principles, Sirian Star Enterprises Pty Ltd will:

- Conduct mandatory pre-employment screening, including police checks and Working with Children Checks, and renew these annually.
- Ensure all workers understand and meet their obligations under the NDIS Code of Conduct.
- Operate a safeguarding system integrated with our Risk Management, Incident Management, and Continuous Improvement systems.
- Promote risk awareness and shared decision-making with participants through person-centred planning.
- Support participants to develop their own safeguarding strategies, including linking to natural supports and community connections.
- Offer training and capability-building for both staff and participants to reduce vulnerability to harm.
- Encourage open reporting and continuous review through our Incident Management System.

- Ensure that all incidents involving violence, abuse, neglect or exploitation are treated as reportable incidents and managed in accordance with our *Reportable Incident, Accident and Emergency Policy and Procedure*.

We will work with participants to tailor safeguards that meet their cultural, communication and accessibility needs, and will always seek to involve them in decisions about how risks are managed and safety is promoted.

4.0 Procedure

Sirian Star Enterprises Pty Ltd will implement this policy through the four key focus areas:

- 1) Proactive approach to identifying, assessing, and managing risks through our risk management and incident management policy and processes.
- 2) Developing workforce capability by ensuring our Recruitment and Selection, Staff Training and Human Resources Policies and processes:
 - a. select workers with the right skills and knowledge to support people with disability,
 - b. undergo all checks required including police and working with children,

- c. have monthly training to keep them updated on skills and knowledge required to support people with a disability.
- 3) Working with people with disability to proactively develop safeguards through:
 - a. regular communication channels such as Participant Information Manuals and
 - b. six monthly plan meetings
 - c. Risk, Incident and Quality management processes
 - 4) Effective corrective measures in response to incidents through:
 - a. Ensuring staff are trained to assist participants to:
 - i. know what they might be at risk of
 - ii. think about if they are at risk
 - iii. manage risks
 - b. Including networks in the community to support participants to know who they can contact and what to do before they are needed
 - c. Assist participants if anything goes wrong by ensuring we have sufficient support processes and policies in place and staff trained to manage these

All safeguarding concerns, including suspected abuse, neglect, or exploitation, must be treated as reportable incidents and managed in accordance with the Reportable Incident, Accident and Emergency Policy and Procedure When identifying, assessing, and managing risks, Sirian Star Enterprises Pty Ltd will:

- Use trauma-informed and culturally safe approaches tailored to the participant's background, culture, and identity.
- Involve participants, families, and advocates in planning their safeguards.
- Respect participant dignity of risk, while applying safeguards to prevent harm wherever possible.
- Train staff on recognising and responding to safeguarding concerns, including their mandatory reporting obligations under the NDIS (Incident Management and Reportable Incidents) Rules 2018.

5.0 References

- NDIS Code of Conduct (2018)
- NDIS (Incident Management and Reportable Incidents) Rules 2018
- NDIS Quality and Safeguarding Framework
- Australia's Disability Strategy 2021-2031
- National Disability Insurance Scheme Act 2013 (Commonwealth)
- NDIS Practice Standards and Quality Indicators (2021)
- United Nations Convention on the Rights of Persons with Disabilities
- www.ndis.gov.au/participantsafeguarding
- www.ndis.gov.au
- Participant Safeguarding Policy Implementation Plan (NDIS)
- Participant Safeguarding Policy Easy Read

6.0 Definitions

Term	Description
Safeguards might include:	<ul style="list-style-type: none"> • getting support to make decisions. • building relationships with people who can help. • learning how to stay safe, using accessible information.
Accessible information	When information is accessible, it is easy to: <ul style="list-style-type: none"> • find and use. • understand.
Support network	A support network is all the people who support people with disabilities to use safeguards
Dignity of Risk	The right of participants to make their own decisions and take risks as part of leading an independent and fulfilling life, even if this includes the possibility of failure
Violence	when someone hurts you
Abuse	when someone treats you badly
Neglect	when someone is not helping you the way they are supposed to
Exploitation	Taking advantage of a person for personal gain, including through financial, sexual, emotional, or other forms of abuse or manipulation

Working with Children Policy and Procedure - South Australia

1.0 Purpose

The purpose of this policy is to ensure that children and young people under the age of eighteen are safe, respected, and protected from harm while receiving supports through Sirian Star Enterprises Pty Ltd. This policy outlines the standards, roles, and responsibilities for maintaining child-safe practices and ensuring that our environments are protective, inclusive, and respectful of children's rights.

2.0 Scope

This policy applies to all staff and third-party providers who engage with or may have contact with children or young people through Sirian Star Enterprises Pty Ltd's services.

3.0 Policy

Sirian Star Enterprises Pty Ltd is committed to providing a safe, inclusive, and protective environment for all children and young people accessing our services. We will uphold the highest standards of child protection and actively embed child-safe practices in our operations.

This policy aligns with the NDIS Practice Standards, NDIS Code of Conduct, and National Principles for Child Safe Organisations. It also reflects legislative obligations under the Children and Young People (Safety) Act 2017 (SA), the Child Safety (Prohibited Persons) Act 2016 (SA), and the NDIS (Practice Standards – Worker Screening) Rules 2018.

Sirian Star Enterprises Pty Ltd will:

- Appoint a Child Safety Contact Officer, held by the Senior Care Coordinator or delegate, to oversee compliance, respond to concerns, and support staff in implementing child-safe practices.
- Require all staff working in risk-assessed roles to complete a NDIS Worker Screening Check and provide evidence of a current, valid Working With Children Check issued by the South Australian Department of Human Services.
- Verify and record screening results in the NDIS Worker Screening Database and maintain accurate records in each personnel file.
- Ensure that staff understand and comply with mandatory reporting obligations, reporting any suspicion of abuse, neglect, or harm to the appropriate authorities without delay.
- Provide children and young people with access to appropriate support services, such as:
 - **Kids Helpline:** 1800 55 1800
 - **Child Wise:** www.childwise.org.au
 - **Bravehearts:** www.bravehearts.org.au
 - **eSafety Commissioner:** www.esafety.gov.au

- Support and encourage any individual to report concerns regarding a child's safety, and ensure they can do so without fear of retaliation.
- Promote early intervention and prevention strategies by embedding child safety in recruitment, induction, ongoing training, and daily practice.
- Follow our internal Statement of Commitment to guide staff and carers in recognising and fulfilling their role in safeguarding children and young people in care.

Sirian Star Enterprises Pty Ltd upholds the rights of children to feel safe, be heard, and participate in decisions affecting their lives. Child safety is everyone's responsibility, and we expect all workers to act with vigilance, care, and professionalism at all times.

4.0 Procedure

4.1 When to report a reasonable belief of harm or risk of harm

Risk assessments will consider NDIS-specific child safeguarding risks, including online grooming, unsupervised access, and third-party provider risks.

For any child and young person at immediate and real risk, staff must call 000 Police immediately and then inform management. The individual's safety must be at the forefront of all actions.

It is important to always search for the cause of a change in a participant's behaviour or unexplained physical symptoms. When a participant shows one or more of the possible signs of harm, risk of harm or abuse, it must be reported immediately, even though this does not automatically mean harm or abuse has occurred.

All abuse, neglect, or harm involving a NDIS participant under 18 must also be reported to the NDIS Commission as a Reportable Incident within 24 hours of awareness, in line with the NDIS (Incident Management and Reportable Incidents) Rules 2018.

Possible signs of harm or risk of harm are when:

- a participant shows a change in behaviour or mood that may indicate they are being harmed or abused
- someone is seen behaving inappropriately toward a participant
- a participant tells staff another person is harming or abusing them
- a person tells staff they are abusing a participant
- a participant or visitor advises staff that they have observed abusive or harmful acts
- someone observes an action or inaction towards the participant that may be considered abusive or harming
- a person suspects or believes a participant is being harmed or abused

The staff member will report to the South Australian Government's Department of Child Protection on 13 14 78. Failure to report an abusive, harmful or at risk of harm situation may result in a criminal offence.

4.2 How to report

The staff member with a reasonable belief of harm or risk of harm will use the online child protection reporting system to report a less serious concern(s):

Department of Child Protection

Website:

<https://www.childprotection.sa.gov.au/report-suspected-harm/process-for-mandated-reporters>

The staff member will use their professional understanding and knowledge of child protection to determine when to contact the required reporting body. The Senior Care Coordinator will undertake the following:

- At the time it is determined there is a risk of harm, they will report a suspected case of child harm, abuse or neglect via a phone call to:
 - Child Abuse Report Line (CARL) - Phone: 13 14 78
 - if at immediate risk, report to South Australia Police (SAPOL) on 000
 - In cases involving Aboriginal children and young people, support is provided by Yaiitya Tirramangkotti - an Aboriginal team, via the CARL number.
- All serious concerns are reported via the Child Abuse Report Line, not the website's online reporting system.

The individual who identifies the harm or risk of harm is the person who has made the report to CARL/SAPOL and is required to report internally, so Operations Manager can report to the NDIS as abuse and neglect are identified as reportable incidents.

In all cases, the relevant authority (Department for Child Protection/SA Police) will guide us on how to proceed after a notification.

Once a report is made to CARL or SAPOL, the Operations Manager is also responsible for reporting to the NDIS Commission within required timeframes. This includes completing the NDIS Reportable Incident Form through the MyNDIS portal.

4.3 Details to provide

The staff member will provide the following information to the Child Abuse Report Line:

- child's name, age, date of birth and address
- description of injury, harm, risk of harm, abuse or neglect (outline current and previous)

- child's current situation
- location of the child, parent or caregiver and alleged perpetrator
- when and how the staff member found out about the harm, risk of harm or abuse

4.4 Child identification details and context

Sirian Star Enterprises Pty Ltd will need to provide enough detail to identify the child or young person and give context to your report, including:

- child's full name
- date of birth or age
- current address
- contact number
- school/kindergarten/childcare centre
- ethnicity, i.e. cultural background, aboriginal kinship group, non-English speaking
- who are the parents; do they all live in the same house; are there siblings in the house?
- alleged perpetrator's name, age, address, relationship to the child, and current whereabouts
- current whereabouts of the child of concern
- details of when the next expected contact with the alleged perpetrator will occur
- If in place, family court orders, apprehended violence orders, and domestic violence orders

4.5 Supporting a child, young person, family and staff

Our management will put support strategies in place for the child, young person and their family. Strategies will vary according to the situation, and staff will be informed, trained, and supported in implementing strategies.

Strategies may include:

- Informing the child/young person/family that they are believed. One of the most helpful things you can do following disclosure of harm or risk of harm is to believe the child or young person.
- Reassuring the child or young person that they have done the right thing by telling someone about the harm and that they are not in trouble. Give them age-appropriate information regarding what will happen next, ensuring that the adults take care of things (contact the Kids Helpline or Youth Helpline). Be careful not to make promises you can't keep, such as not telling anyone else.
- Acting protectively.
- Taking immediate steps to ensure the child or young person's safety and the safety of other children or young people who may be exposed to harm or abuse.
- Providing adequate support to meet the needs of the individual circumstances, e.g. cultural support and advocacy support.
- Provide staff with debriefing and other supports to ensure their health and well-being are supported.

4.6 Defining child maltreatment, harm, abuse and neglect

Child maltreatment is the abuse and neglect that occurs to children under 18. It includes all types of physical and emotional ill-treatment, sexual abuse, neglect, negligence and commercial or other exploitation, which results in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power

4.6.1 Physical harm or risk of harm

- Signs and symptoms: Bruising, lacerations, welts, rashes, broken or healing bones, burns, weight loss, facial swelling, missing teeth, pain or restricted movements, crying, acting fearful, agitation, drowsiness, hair loss or poor physical well-being.
- Causes: Hitting, slapping, pushing, punching or burning, which involves an incident that is non-accidental, resulting in pain or injury.

4.6.2 Psychological and emotional harm or risk of harm

- Signs and symptoms: Loss of interest in self-care, helplessness, withdrawal, apathy, insomnia, fearfulness, reluctance to communicate openly, choosing not to maintain eye contact, paranoia and confusion.
- Causes: Intimidation, humiliation, harassment, threatening behaviour, sleep deprivation, withholding affection, and not allowing a person to maintain their decision-making powers which lead to a pattern when repeated over time.

4.6.3 Sexual abuse

- Signs and symptoms: knowing more about sexual activities than other children their age, playing sexually, masturbating more than what's typical for their age and stage of development, refusing to undress for activities or wear additional layers of clothing, having bruising, bleeding, swelling, tears or cuts on their genitals or anus, having unusual vaginal odour or discharge, having itching or pain in the genital area, difficulty going to the toilet, walking or sitting, having a sexually transmitted disease or urinary tract infection, having torn, stained or bloody clothing, especially underwear, being afraid of being alone with a particular person or going to a particular place, becoming withdrawn, unusually reactive or begins displaying high-risk behaviours (including substance misuse), being frequently depressed, feel suicidal or attempt suicide, creating stories, poems or artwork about abuse, Having problems sleeping or starts having nightmares, Starting to wet the bed or soil themselves.
- Causes: the involvement of dependent, developmentally immature children and adolescents in sexual activities that they do not fully comprehend, are unable to give informed consent to, and violate social taboos of family roles.

4.6.4 Neglect

- Signs and symptoms: Poor hygiene or personal care, unkempt appearance, lack of personal items, absence of health aids, weight loss, agitation, inappropriate clothing, and lack of food.
- Cause: Intentional failure to provide basic life necessities.

4.6.5 Social harm or risk of harm

- Signs and symptoms: Sadness and grief due to people not visiting, anxiety after a specific person's visit, withdrawal, low self-esteem, appearing ashamed, passivity, and listlessness.
- Causes: Prevention of contact with friends or family, preventing access to social activities.

4.6.6 Grooming

- Signs and symptoms: Being very secretive about how they're spending their time, including when online, having money or new things like clothes and mobile phones that they can't or won't explain, depression and or anxiety, underage drinking or drug taking.
- Causes: Grooming is when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit, harm and abuse them.

4.6.7 Exposure to Family Violence

- Signs and symptoms: Aggression, anxiety, regressive behaviours, hypervigilance, poor sleep, or clinginess.
- Cause: Witnessing or being exposed to domestic or family violence between caregivers or household members.

5.0 Policy Review and Feedback

This policy and procedure will be reviewed at least every two years by the Operations Manager (or their delegate) or in response to legislative triggers or mandatory reportable matters. Reviews will incorporate staff, participants, and other stakeholder feedback where relevant.

6.0 Related documents

- Code of Conduct Agreement
- Child and Young People Handbook
- Incident Investigation Form
- Incident Investigation Form Final Report
- Incident Report
- Incident Register
- Risk Assessment Form
- Risk Management Plan Register
- Reportable Incident, Accident and Emergency Policy and Procedure
- Violence, Harm, Abuse, Neglect, Exploitation and Discrimination Policy and Procedure
- Zero Tolerance Policy and Procedure
- Risk-assessed Role Register
- Risk-assessed Role – Employee Register
- [Child Safety Statement of Commitment](#)
- [NDIS Reportable Incident Form](#)
- Privacy and Dignity Policy and Procedure

7.0 References

- Children and Young People (Safety) Act 2017 (SA)
- NDIS (Practice Standards - Worker Screening) Rules 2018
- NDIS (Quality and Safeguards) Commission 2018
- The National Framework for Protecting Australia's Children
- [The National Principles for Child Safe Organisations](#)
- United Nations Convention on the Rights of the Child 1989
- Children and Young People (Oversight and Advocacy Bodies) Act 2016 (SA)
- NDIS Code of Conduct Rules 2018

Child Safe Environment Policy and Procedure - South Australia

1.0 Purpose

The purpose of this policy is to ensure that children and young people under the age of eighteen are safe, respected, and supported in environments free from harm, abuse, neglect, exploitation, and discrimination. Sirian Star Enterprises Pty Ltd aims to uphold the rights of every child to feel protected and empowered, while providing services that foster participation, confidence, and well-being. This policy outlines how our organisation will implement child-safe practices, support positive engagement with children and young people, and create a culture of awareness, prevention, and accountability.

2.0 Scope

This policy applies to all staff engaged by Sirian Star Enterprises Pty Ltd who provide supports to or interact with children and young people in any service setting.

3.0 Definitions

Term	Definitions
Child or young person	persons under 18 years of age.
Complainant	a person who makes a complaint.
Harm	Section 17 of the Safety Act defines 'harm' as physical or psychological harm (whether caused by any act or omission), including harm caused by sexual, physical, mental or emotional abuse or neglect.
National Police Check	<p>a summary of an individual's offender history in Australia and a record of their criminal history relating to convictions, finding of guilt or pending court proceedings. They are available from South Australia Police (SAPOL) or organisations accredited by the Australian Criminal Intelligence Commission.</p> <p>It is an organisational decision if a National Police Certificate (NPC) is required for workers or volunteers. However, the organisation can no longer use the NPC to assess if a person is suitable to work or volunteer with children in South Australia; this must be determined by a valid, not prohibited Working with Children Check.</p>
Working with Children Check	By law, people working or volunteering with children in South Australia must have a valid, not prohibited, Working with Children Check. A Working with Children Check assesses

Term	Definitions
	whether a person poses an unacceptable risk to children. As part of the process, the Screening Unit will look at criminal history, child protection information and other information.
NDIS Worker Screening Check	<p>It is an assessment of whether a person</p> <ul style="list-style-type: none"> ● who works, or seeks to work, with people with a disability poses a risk to them. ● is cleared or excluded from working in certain roles with people with disability. <p>The NDIS Worker Screening Check is conducted by the SA Worker Screening Unit and decides whether a person is cleared or excluded.</p> <p>Registered NDIS providers must only engage workers who have been cleared in certain risk-assessed roles. (Risk-assessed roles are determined to be a role with more than incidental contact with a participant and child NDIS Rules 2018).</p>

4.0 Policy

Sirian Star Enterprises Pty Ltd is committed to creating and maintaining a child-safe environment that protects children and young people from all forms of harm. Our practices are guided by the Children and Young People (Safety) Act 2017 (SA), the Child Safety (Prohibited Persons) Act 2016 (SA), and the National Principles for Child Safe Organisations, and are aligned with the NDIS Practice Standards and the NDIS Code of Conduct.

All staff, contractors, and volunteers must:

- Hold current, valid Working with Children Checks and NDIS Worker Screening Checks, verified before commencement in a risk-assessed role.
- Undertake induction and ongoing training in child protection, including mandatory reporting obligations under South Australian law.
- Comply with this policy, all related procedures, and the Code of Conduct.
- Immediately report any suspected harm or risk of harm to children and young people to the Child Abuse Report Line (CARL), and cooperate fully in follow-up processes.
- Engage with children and young people respectfully and supportively, ensuring they feel safe, heard, and able to raise concerns or complaints without fear.

Sirian Star Enterprises Pty Ltd has appointed the Senior Care Coordinator (or delegate) as the designated Child Safety Contact Officer, responsible for:

- Overseeing child protection implementation, training, and compliance.
- Managing screening records and ensuring all checks are current and verified.
- Supporting staff in upholding child-safe practices and responding to concerns.
- Leading reviews of this policy every two years and lodging compliance statements as required.

Children and young people supported by Sirian Star Enterprises Pty Ltd will:

- Be provided with age-appropriate information about their rights, including how to make a complaint or raise safety concerns.
- Be encouraged to participate in support planning and service feedback through face-to-face meetings, surveys, and accessible communication formats.
- Have individual support plans tailored to their safety and development needs, with regular reviews and adjustments to support skill-building, independence, and participation.

Families and carers will be included in safeguarding processes and provided with handbooks and resources that explain our commitment to child safety and the expectations placed on all involved.

Sirian Star Enterprises Pty Ltd maintains a zero-tolerance approach to child abuse and neglect. All reportable incidents involving children will be managed in accordance with the NDIS (Incident Management and Reportable Incidents) Rules 2018, and all notifications will comply with Section 30(3) of the Children and Young People (Safety) Act 2017 (SA).

This policy is supported by and linked to the following documents:

- Zero Tolerance Policy and Procedure
- Working with Children Check Policy and Procedure
- Violence, Harm, Abuse, Neglect, Exploitation and Discrimination Policy and Procedure
- Risk Management Policy and Procedure
- Complaints and Feedback Policy and Procedure
- NDIS Worker Screening and Risk Assessed Roles Policy and Procedure
- Individual Values and Beliefs Policy and Procedure
- Aboriginal and Torres Strait Islander Policy and Procedure
- Human Resource Management Policy and Procedure

4.1 Risk Assessment

Sirian Star Enterprises Pty Ltd acknowledges that prevention is the best protection from harm or risk of harm and recognises their duty of care obligations to implement prevention strategies. Each child or young person has completed an Individual Risk Profile and Home Safety Checklist. This information allows us to create a Support plan designed to provide support and care for the child or young person, including physical safety and the child or young person's well-being Risk Profiles and Safety Plans will be reviewed at least annually or earlier following an incident, complaint, or disclosure involving the child or young person.

Identified risks may include:

- Our culture is not child-safe focussed
- The organisation's current code of conduct is not role-related, targeted to our organisation, or is not circulated to or understood by staff and volunteers
- Children/young people do not feel included
- Children/young people and their families are not supported to report concerns, complaints and feedback
- Children/young people are physically touched by staff/volunteers to correct techniques (physiotherapy, occupational therapy)
- Children/young people have access to an unsafe online environment
- Organisational staff (including employees and volunteers) harm children/young people
- Third-party contractors (while delivering services for the organisation) harm children/young people
- Children/young people are not supported when harm occurs
- Recruitment of a 'prohibited person' within the organisation or contracting with a third party that does not have a Not Prohibited Working with Children Check (WWCC) or a child-safe environments compliance statement (see Appendix A)
- Allowing a person to work with children or young people while the WWCC is being processed
- Organisational staff (including employees and volunteers) do not understand their obligations to report harm and risk of harm to the Child Abuse Report Line and SA Police if a child/young person is at immediate risk or requires an internal reporting process before meeting legal obligations to report to CARL
- Use of power to hurt, scare or control children/young people
- Not allowing children/young people to participate in spiritual or religious practices that are important to them
- Children/young people are provided with unsupervised services
- The organisation holds overnight and offsite activities with children/young people Child safe environments compliance statement is not lodged with the Department of Human Services
- Taking images of children and young people
- Supervision of children and young people
- Physical environment

- Online communications between staff/volunteers and children/young people
- Protecting privacy and confidentiality
- Procedures for dealing with situations where a member is being investigated for or is charged with a serious criminal offence

Risk minimisation actions

- Child-focused Code of Conduct is in place that sets the behavioural standards expected, including what happens when a breach occurs, is circulated to staff and volunteers and is displayed in public places
- Meet the requirements of the Children and Young People (Safety) Act 2017 (which mandates child-safe environments) and the Child Safety (Prohibited Persons) Act 2016 (which mandates Working with Children Checks)
- Strategies are in place to make sure that child safety (through the National Principles for Child Safe Organisations) is embedded across the organisation
- The organisation uses inclusive, developmentally- appropriate language and resources to help children/young people to feel valued, respected and included
- Strategies to embed a child-safe organisational culture are reviewed and updated regularly
- The Child Safe Environments Policy is reviewed at least once every five years. When this happens, a new child-safe environments compliance statement is lodged with the Department of Human Services
- Support through training and supervision is provided to organisational staff (including employees and volunteers) through
 - Quarterly reviews
 - Seeking feedback from supervisors
 - Induction training - understanding of harm and risk of harm and how to report effectively
 - regular supervision meetings are conducted to review practice and update where appropriate, and training is provided that increases
- Working with Children Checks (WWCC) ensures that people working with children and young people are assessed as not posing an unacceptable risk to children and young people. Those at an unacceptable risk ('Prohibited' WWCC) cannot work with children and young people.
- Recruitment processes, including undertaking referee checks to ensure the suitability of persons before they are employed/volunteer with our organisation, are completed
- When taking images of children and young people, must have the consent of the child or young person and parent/guardian consent required
- Complaints processes are in place and promoted to children, young people and their families to make sure that they feel safe reporting to the organisation
- Cyber safety and social media guidelines are in place and provided to all staff and volunteers
- Appropriate supervision is provided for all online activities
- Children and young people are to be supervised by parents/guardians at all times

- Our child-safe environments policies and procedures (including Code of Conduct) are made available to staff, volunteers, children, young people and their families by induction packs and on our website.
- Children, young people and their families are encouraged to participate in our organisation and provide feedback through surveys, questionnaires, and feedback opportunities during sessions

If children and young people are harmed, we support them and their families by

- Ensuring the immediate safety and wellbeing of the child or young person.
- Listening respectfully and taking all concerns, disclosures, and allegations seriously.
- Providing a safe, supportive, and trauma-informed response that places the needs of the child or young person first.
- Following our Child Safety and Protection procedures, including mandatory reporting requirements where applicable.
- Working collaboratively with parents, guardians, carers, and relevant authorities to ensure appropriate supports are in place.
- Maintaining confidentiality and privacy in accordance with legislative and organisational requirements.
- Providing information about available support services and referral pathways where additional assistance may be required.
- Keeping the child, young person, and their family informed throughout the process, where appropriate and safe to do so.
- Reviewing incidents to identify opportunities for improvement and strengthen our child-safe practices. Staff, volunteers and contractors undertake training to understand their obligations to report harm and risk of harm (see 4.2 below)
- All staff, volunteers, and contractors must read the National Principles for Child Safe Organisations, Code of Conduct, and the mandatory reporting guidance relevant to their state or territory, and undertake child safe e-learning modules in the first week of working with the organisation (see 4.2 below).
- Where physical contact is required, this is undertaken safely by explaining why contact is required and what will happen and asking the child/young person for their permission (or their family if this is more appropriate) before proceeding
- Staff, volunteers and contractors working with children and young people with disability must hold a valid Not Prohibited Working with Children Check (WWCC) even if they are working with children and young people less than seven days a year

According to our internal reviews of policies and procedures, this policy must be reviewed every two years.

Staff should guide children and young people who require assistance to Kids Helpline on 1800 55 1800 and Youth Helpline on 1300 13 17 19 for support, as required.

4.2 Staff requirements, support and training

All mandated notifiers must complete 'Safe Environments: Through Their Eyes' training in accordance with South Australian child protection requirements. Staff in risk-assessed roles are required to complete SMART online training as part of their induction and every three years thereafter, as part of our organisation's commitment to trauma-informed practice and child safeguarding.

The legislative requirement is that staff engaged in a risk-assessed role must have the required South Australian clearance checks. We will meet the requirements of the Child Safety (Prohibited Persons) Act 2016 and ensure that staff and volunteers have a valid, 'not prohibited' Working with Children Check issued by the Screening Unit of the Department of Human Services.

All staff must undergo an interview before a job offer is made. This interview will include the following:

- overview experience working with children and young people
- behaviour management techniques, e.g. questions such as:
 - Tell me about when you had to manage a child or young person with behavioural problems
 - How would you respond if a child or young person yelled at you?
 - What if they started to throw items?

Screening post-interview of the suitable candidate is essential, and this process includes at least two (2) reference checks and qualification checks. All hired staff will have buddying to two (2) shifts, be allocated a supervisor and have a probationary period.

During their onboarding process, all staff and volunteers are trained in child and young person safety and must undertake annual training to ensure they are current with standards and requirements. Staff must read and agree to comply with the Code of Conduct (see Appendix B). We will use the Mandatory Reporter Guide as part of the training. Our staff annual performance review will review current knowledge of standards and reporting. This information will be used to create relevant training against SA requirements. All information will be recorded in the person's Staff Training Record; note contractors will have this form to record their training to ensure compliance.

Staff will be trained in the following:

- The real or potential risk of harm indicators
- Mandatory reporting obligations
- Internal requirements for informing management
- Completing Incident Investigation so management can review the information
- Not asking leading questions
- Code of Conduct
- Commitment to the safety of children and young people

- Record keeping and information sharing
- Job description

Our mandated notifiers to attend a 'Safe Environments: Through Their Eyes' training course. Management meetings will include child and young person's safety on their agenda. Staff, contractors, and volunteers must:

- read and understand the Mandatory Notification Information Booklet (see: https://dhs.sa.gov.au/data/assets/pdf_file/0003/103179/CSE-Mandatory-notification-information-booklet.PDF)
- complete the online SMART (Strategies for Managing Abuse Related Trauma) training (see: <https://professionals.childhood.org.au/prosody/2015/07/smart-online>)
- view the resources Keeping our kids safe developed by SNAICC at <https://www.snaicc.org.au/policy-and-research/child-safety-and-well-being/keeping-our-kids-safe/>
- be provided with professional development opportunities to build knowledge and skills regarding the well-being and development of children and young people
- regularly complete the specific training, e.g. every three years (mandatory reporting, Keeping our kids safe)

All staff have quarterly supervision and support meetings or visits, allowing us to determine the current knowledge and skills of the worker, therefore, allowing us to create additional support and guidance as required. Staff reporting any risk of harm will undertake a debriefing session, and this session will determine additional support required, e.g. professional support.

Before employment, staff must undergo the Working with Children Check and NDIS worker screening process. Results are recorded in their personnel file. Employees performing within a child or young person-related role have been determined as risk-assessed and require NDIS Worker Screening via the SA Worker Screening Unit (WSU). The employee must apply to the Department of Human Services Screening Unit, provide the relevant application information and pay the fee.

It is then the responsibility of the Operations Manager to verify all risk-assessed roles and maintain appropriate records using the Contractor Risk Assessed Check Form, Risk Assessed Role Register and the Risk-Assessed Role – Employee Register. Staff cannot work with children and young people unless their worker's screening has been verified.

Staff, volunteers, contractors, or other relevant parties must comply with child-safe standards, legislation, and regulations. If a person breaches these compliance requirements, the Operations Manager will advise the Screening Unit regarding this person, including any serious criminal offence,

child protection information, or disciplinary or misconduct information. The informing method will vary according to the current issue but will usually be via phoning the Screening Unit.

5.0 Procedure

5.1 Communication

We have developed a Child and Young Person Handbook and Staff handbook that informs children, young people, and staff about their rights and their right to participate in decisions affecting them. We will always take input seriously, as per National Principle 2.

During the initial intake, development of a support plan and reviews, our team informs and involves families in promoting the safety of the child or young person. We work with the child or young person's community to ensure information is provided and they are involved in their safety and well-being (National Principle 3).

To comply with Chapter 8 (Section 114(5)) of the Children and Young People (Safety) Act 2017, children, young people, their families, networks, staff, and contractors can request a copy of the organisation's child-safe environments policies and procedures. We will make this information available on our website for easy access. To request a copy:

1. Email admin@sirianstar.com.au
2. Telephone 1300 141 482
3. Operations Manager or their delegate will forward the policy within two working days

5.2 Listening to children and young people (National Principle 2)

Our organisation will

- communicating using age and developmentally-appropriate language)
- feedback and concerns can be reported by children, young people and their families or carers by:
 - Email admn@sirianstar.com.au
 - Telephone 1300 141 482
 - Anonymously self-addressed envelope provided at intake
 - Staff or contractors who will record and inform management
- Design consultation methods suited to our clientele and that consider the child or young person's age, developmental level and cultural backgrounds
- using a survey (hard copy or online)
- invite formal or informal feedback from children and young people about their experiences with us
- invite children and young people to be represented on a board or committee or organise a youth committee or focus group

5.3 When to report a real or potential risk of harm situation

For any child and young person at immediate and real risk, staff must call 000 Police immediately and inform management. The individual's safety must be at the forefront of all actions.

Staff must be informed of their obligations, including legislation provisions Criminal Law Consolidation Act (Section 64A and 65):

- failure to report child sexual abuse may lead to a maximum of 3 years imprisonment
- failure to protect a child from sexual abuse may lead to 15 years imprisonment

It is important to always search for the cause of a change in a child or young person's behaviour or unexplained physical symptoms. If a child or young person shows one or more possible signs of harm or risk of harm, it must be reported immediately, even though this does not automatically mean harm has occurred.

Possible signs of harm or risk of harm are when:

- a child or young person shows a change in behaviour or mood that may indicate they are at risk of real or potential harm
- someone is seen behaving inappropriately towards a child or young person
- a child or young person tells staff another person is abusing them
- a person tells staff they are abusing a child or young person
- a child, young person or visitor advises staff that they have observed abusive or harmful acts
- someone observes an action or inaction towards the child or young person that may be considered abusive
- a person suspects or has reason to believe a child or young person is at risk of real or potential harm

The person (reporter) who formed the suspicion or belief of harm must report to the South Australian Government's Department of Child Protection. Failure to report an abusive, harmful or at risk of harm situation may result in a criminal offence.

5.4 How to report

The reporter will use the online child or young person protection reporting system to report a less serious concern(s):

Department of Child Protection

Website: <https://www.childprotection.sa.gov.au/reporting-child-abuse/report-child-abuse-or-neglect>

The staff member will use their professional understanding and knowledge of child and young person protection to determine when to contact the required reporting body. The reporter will undertake the following:

- At the time it is determined there is a risk of harm, they will report a suspected case of a child or young person's harm or risk of harm via a phone call to the following:
 - Child Harm or risk of harm Report Line (CARL) - Phone: 13 14 78
 - if at immediate risk, report to South Australia Police (SAPOL) on 000.
 - In cases involving Aboriginal children and young people, support is provided by Yaitya Tirramangkotti - an Aboriginal team, via the CARL number.

- All serious concerns are reported via the Child Abuse Report Line, not the website's online reporting system.

The individual who identifies the harm or risk of harm is the person who makes the report to CARL/SAPOL and afterwards is required to report internally, so the Senior Care Coordinator can determine if further support is required for the child or the family.

In all cases, the relevant authority (Department for Child Protection/SA Police) will guide us on how to proceed after a notification.

5.5 Details to provide

The staff member will provide the following information to the Child Abuse Report Line:

- Child or young person's name, age, date of birth and address
- description of injury, harm or risk of harm (outline current and previous)
- child or young person's current situation
- location of the child, young person, parent or caregiver and alleged perpetrator
- when and how the manager found out about the harm or risk of harm

5.6 Child identification details and context

Sirian Star Enterprises Pty Ltd will need to provide enough detail to identify the child or young person and give context to your report, including:

- child or young person's full name
- date of birth or age
- current address
- contact number
- school/kindergarten/childcare centre
- ethnicity, i.e. cultural background, aboriginal kinship group, non-English speaking
- who are the parents; do they all live in the same house; are there siblings in the house?
- alleged perpetrator's name, age, address, relationship to the child or young person, and current whereabouts
- current whereabouts of the child or young person of concern
- details of when the next expected contact with the alleged perpetrator will occur
- If in place, family court orders, apprehended violence orders, and domestic violence orders

5.7 Supporting a child, young person, family and staff

Our management will put support strategies in place for the child, young person and their family. Strategies will vary according to the situation, and staff will be informed, trained, and supported in implementing strategies.

Strategies may include:

- Inform the child/young person/family that they are believed. One of the most helpful things you can do following disclosure of harm or risk of harm is to believe the child or young person.
- Reassure the child or young person that they have done the right thing by telling someone about the harm and that they are not in trouble. Provide them with age-appropriate information regarding what will happen next, ensuring that the adults take care of things (contact the Kids Helpline or Youth Helpline). Be careful not to make promises you can't keep, such as not telling anyone else.
- Act protectively.
- Take immediate steps to ensure the child or young person's safety and the safety of other children or young people who may be exposed to harm, risk of harm or abuse.
- Provide adequate support to meet the needs of the individual circumstances, e.g. cultural support and advocacy support.
- Provide staff with debriefing and other supports to ensure that their health and well-being are supported.

5.8 Defining child maltreatment, harm or risk of harm and neglect

Child maltreatment is the abuse and neglect that occurs to children under 18. It includes all types of physical and emotional ill-treatment, sexual abuse, neglect, negligence and commercial or other exploitation, which results in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

5.8.1 Physical harm or risk of harm

- Signs and symptoms: Bruising, lacerations, welts, rashes, broken or healing bones, burns, weight loss, facial swelling, missing teeth, pain or restricted movements, crying, acting fearful, agitation, drowsiness, hair loss or poor physical well-being.
- Causes: Hitting, slapping, pushing, punching or burning, which involves an incident that is non-accidental, resulting in pain or injury.

5.8.2 Psychological and emotional harm or risk of harm

- Signs and symptoms: Loss of interest in self-care, helplessness, withdrawal, apathy, insomnia, fearfulness, reluctance to communicate openly, choosing not to maintain eye contact, paranoia and confusion.
- Causes: Intimidation, humiliation, harassment, threatening behaviour, sleep deprivation, withholding affection, and not allowing a person to maintain their decision-making powers which lead to a pattern when repeated over time.

5.8.3 Sexual abuse

- Signs and symptoms: knowing more about sexual activities than other children their age, playing sexually, masturbating more than what's typical for their age and stage of development, refusing to undress for activities or wear additional layers of clothing, having bruising, bleeding, swelling, tears or cuts on their genitals or anus, having unusual vaginal odour or discharge, having itching or pain in the genital area, difficulty going to the toilet, walking or sitting, having a sexually transmitted disease or urinary tract infection, having torn, stained or bloody clothing, especially underwear, being afraid of being alone with a particular person or going to a particular place, becoming withdrawn, unusually reactive or begins displaying high-risk behaviours (including substance misuse), being frequently depressed, feel suicidal or attempt suicide, creating stories, poems or artwork about abuse, Having problems sleeping or starts having nightmares, Starting to wet the bed or soil themselves.
- Causes: the involvement of dependent, developmentally immature children and adolescents in sexual activities which they do not fully comprehend, are unable to give informed consent to and that violate social taboos of family roles

5.8.4 Neglect

- Signs and symptoms: Poor hygiene or personal care, unkempt appearance, lack of personal items, absence of health aids, weight loss, agitation, inappropriate clothing, and lack of food.
- Cause: Intentional failure to provide basic life necessities.

5.8.5 Social harm or risk of harm

- Signs and symptoms: Sadness and grief due to people not visiting, anxiety after a specific person's visit, withdrawal, low self-esteem, appearing ashamed, passivity, and listlessness.
- Causes: Prevention of contact with friends or family, preventing access to social activities.

5.8.6 Grooming

- Signs and symptoms: Being very secretive about how they're spending their time, including when online, having money or new things like clothes and mobile phones that they can't or won't explain, depression and or anxiety, underage drinking or drug taking.
- Causes: Grooming is when someone builds a relationship, trust and emotional connection with a child or young person, their family or with other workers in an organisation so they can manipulate, exploit and abuse them.

5.9 Complaints and Feedback

This section is not used when there is a reasonable belief that a child or young person has been harmed or is at risk of harm (refer to 4.3 above). Any complaint about staff, volunteers or contractors that identifies and is found to be real may lead to disciplinary measures and their employment being ceased. Any validated complaint related to child protection will lead to the termination of employment.

Complaints and suggestions can be made by:

- using the Complaints and Feedback Form or the Anonymous Complaints and Feedback Form
- contacting a member of staff, verbally or in writing, our staff must offer to document the complaint on behalf of the participant if required and refer the matter to the Operations Manager
- contacting the Complaints Manager, verbally or in writing
- responding to questionnaires and surveys
- sending an email to our contact email
- attending meetings/care conferences
- contacting external complaint agencies, e.g. NDIS Quality and Safeguards Commission, Department of Child Protection
- communicating orally, in writing, or by any other relevant means

Contacts for making a complaint are listed below:

Operations Manager	Renae Gunn
Email address	Renae@sirianstar.com.au
Phone Number	0403 283 872
Postal Address	633 Blamey Road, Yarroweyah, VIC, 3644

Complaints may be made by:

- staff
- participants (adults, children, and young people)
- public
- advocates
- family members
- carers
- anonymous person/s

Results are recorded in the Complaints Compliments and Feedback Register, allowing input into our continuous improvement processes. The Continuous Improvement Register will record improvements established after finalising the complaint management process.

If a complaint is about:

- **Support or services:** The Complaints Manager will deal with the complaint.
- **Staff member/s:** The Complaints Manager will deal with the complaint.
- **CEO/Manager:** An external person or body may be approached, e.g. NDIS Quality and Safeguards Commission.

All staff, participants, family and advocates, visiting health professionals, and visitors are informed of our complaints process via:

- participant welcome information
- initial access to supports
- staff orientation, induction and training
- Meetings, reviews and assessments
- participant agreements
- contractor agreements

If a complaint or allegation involves abuse, neglect, exploitation, or any other NDIS Reportable Incident, the complaint process must be paused, and the NDIS (Incident Management and Reportable Incidents) Rules 2018 must be followed. Immediate reporting to the NDIS Commission is mandatory within 24 hours.

5.9.1 Complaint management process

The investigation must adhere to impartiality, privacy, confidentiality, transparency and timeliness. Complaints will not be discussed with anyone who does not have responsibility for resolving the issue. Sirian Star Enterprises Pty Ltd must consider any cultural and linguistic needs of a participant and provide the relevant support mechanism, such as an interpreter or similar.

Complainants are provided with access to our Complaints and Feedback form. These may be accessed via staff or management. The Complaints Manager will review the individual's needs and assist them using the best means to suit them. The variance between individuals requires a personal approach but may include the following:

- offering an advocate
- providing text telephone (TTY) service to people with a hearing impairment
- ensuring the meeting site is wheelchair accessible
- offering independent assistance to read and write to formulate and lodge a complaint
- seek information from the complainant to determine any special requirements (e.g. access or communication)

The resolution outcomes from a complaint will recognise that people who make a complaint are generally seeking one, or more, of the following outcomes:

- Acknowledgement:
 - genuinely listening without interruption
 - empathising
 - ensuring the complainant feels comfortable (e.g. being aware that staff may be defensive and consider how this is perceived)
 - acknowledgement of the effect of the situation on the individual
 - resolving to a good outcome
 - notifying regularly and promptly on steps undertaken
- Answers:
 - clear explanations relevant to the issue are provided ONLY once all the facts are known
- Actions (Action Plan):
 - what will be done?
 - who will do it?
 - action plan completion date
 - how progress will be communicated to all parties involved
 - oversight of actions
- Apology:
 - consider the form of the apology and the managerial level of response
 - consider timeliness, sincerity
 - be specific and direct
 - accept responsibility if appropriate and provide information on the cause and impacts
 - explain without excuses
 - provide a summary of key actions to move forward and resolve the issue

6.0 Policy Review and Feedback

This policy and procedure will be reviewed at least every two (2) years by the Operations Manager or in response to legislative triggers. Reviews will incorporate staff, participants, and other stakeholder feedback where relevant

7.0 Related documents

- Child and Young People Handbook
- Staff Handbook
- Code of Conduct Agreement
- Incident Investigation Form
- Incident Investigation Form Final Report
- Incident Report
- Incident Register
- Risk Assessment Form
- Risk Management Plan Register
- Reportable Incident, Accident and Emergency Policy and Procedure
- Violence, harm or risk of harm, Neglect, Exploitation and Discrimination Policy and Procedure
- Zero Tolerance Policy and Procedure
- Aboriginal and Torres Strait Islander Policy and Procedures
- Human Resource Management Policy and Procedure
- Risk Management Policy and Procedure
- Working with Children Check Policy and Procedure
- Complaints and Feedback Policy and Procedure
- NDIS Worker Screening and Risk Assessed Roles Policy and Procedure
- Individual Values and Beliefs Policy and Procedure

8.0 References

- Children and Young People (Safety) Act 2017 (SA)
- Child Safety (Prohibited Persons) Act 2016 (SA)
- NDIS (Practice Standards - Worker Screening) Rules 2018
- NDIS (Quality and Safeguards) Commission 2018
- The National Framework for Protecting Australia's Children
- United Nations Convention on the Rights of the Child 1989

Appendix A Commitment to the safety of children and young people

Sirian Star Enterprises Pty Ltd is committed to the safety and well-being of all children and young people who will be the primary focus of our care and decision-making. We have zero tolerance for children and young people being at harm or risk of harm

We are committed to providing a child-safe environment where children and young people feel safe and their voices are heard about decisions that affect their lives. Particular attention will be paid to the cultural safety of Aboriginal children and children from culturally and linguistically diverse backgrounds and the safety of children with a disability.

All people working for or with us are responsible for understanding the important and specific role they play individually and collectively to ensure that the well-being and safety of all children and young people are at the forefront of all they do and every decision they make.

In our planning and practices, we will

- Children and young people's safety and protection are our priority
- Children and young people are valued, respected and encouraged to participate. Their voice is essential to providing appropriate and safe support
- Take a preventative, proactive and participatory approach to child safety.
- Value and empower children to participate in decisions that affect their lives.
- Foster a culture of openness that supports all persons to disclose harm or risks of harm to children safely
- Respect diversity in cultures and child-rearing practices while keeping child safety paramount.
- All children and young people are embraced regardless of their abilities, sex, gender, or social-economic or cultural background and equity is upheld
- Engage only the most suitable people to work with children and have high-quality staff, supervision and professional development.
- Ensure children and young people know who to talk with if they are worried or are feeling unsafe and that they are comfortable and encouraged to raise such issues.
- Assist children and young people in building skills that will assist them in participating in society
- Focus and take action on the protection of children and young people at risk of harm
- Value the input from children, young people and their families in our policies and practices.
- Report suspected harm or risk of harm, neglect or mistreatment promptly to the appropriate authorities.
- Share information appropriately and lawfully with other organisations where the safety and well-being of children are at risk; and

Child and Young Person's Handbooks and accessible display areas include information about services that can assist children and young people

- Kids Helpline on 1800 55 1800
- Youth Helpline on 1300 13 17 19)

Appendix B National Principles for Child Safe Organisations

Principle 1. Child Safety is embedded in organisational leadership, governance and culture

- Commitment to Safety (see Violence, Abuse, Neglect, Exploitation and Discrimination Policy and Procedure).
- Staff are trained in the following:
 - child safety
 - codes of conduct
 - behavioural standards when interacting with children
 - reporting obligations and record keeping
- Risk Management Plans are undertaken for each child.
- Comply with NDIS Code of Conduct and Sirian Star Enterprises Pty Ltd's Code of Conduct.

Principle 2. Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously

- Children can express their views and are provided with opportunities to participate in decisions that affect their lives:
 - upon commencement with our organisation
 - on an ongoing basis – regularly asked for their thoughts and ideas
 - at the review of their plan
- The importance of friendships is recognised, and support from peers is encouraged, helping children feel safe and less isolated:
 - work with the child and the family to determine how best to assist with these linkages
- Children can access abuse prevention programs and information:
 - provide links to relevant organisations, e.g. Kids Helpline
 - age-appropriate information that describes how adults should behave is provided
- Staff are attuned to signs of harm and facilitate child-friendly ways for children to communicate and raise their concerns:
 - staff trained to work with each child
 - knowledge and skills are assessed to determine training to ensure skills and knowledge are evident

Principle 3. Families and communities are informed and involved in promoting child safety and well-being

- All levels of the organisation must encourage families to take an active role in keeping children safe.
- Families and community members are encouraged to provide feedback on how the organisation keeps children safe, and this information is acted upon where necessary:
 - complaint and feedback forms

- meetings about children.

Principle 4. Equity is upheld, and diverse needs are respected in policy and practice

- The Operations Manager and our staff understand barriers that prevent children from disclosing abuse or adults.
- The Operations Manager and our staff identify and respect the diverse needs, abilities and backgrounds of children and understand the value of treating them fairly:
 - review each child's cultural needs at intake
 - provide relevant, culturally sensitive, age-appropriate activities
- All staff are given information about the factors that increase a child's vulnerability to harm:
 - staff are trained and provided with information.
- The Operations Manager ensures that our workforce reflects our participants' diversity, where possible.
- The Operations Manager and staff adapt activities and services to ensure all children feel included:
 - a Risk Management Plan completed for each child
 - strategy planning takes place with the child and their family

Principle 5. People working with children are suitable and supported to reflect child safety and well-being values in practice

- Sirian Star Enterprises Pty Ltd understands that recruitment does not rely solely on a WWCC, so we provide ongoing training opportunities for all staff:
 - induction
 - annual training
- The Operations Manager or delegate responsible for staff recruitment is aware of child-safe recruitment practices.
- Staff recruitment includes job advertisements identifying that our organisation values child safety.
- Our recruitment processes involve a range of interview questions to establish staff suitability. Background and reference checks are carried out and recorded. (see Human Resource Management Policy and Procedure and NDIS Worker Screening and Risk-assessed Roles Policy and Procedure).
- Supervision includes regular reviews to check whether staff follow Codes of Conduct and other Sirian Star Enterprises Pty Ltd child-safe policies.
- The Operations Manager is responsible for monitoring all aspects of supervision and undertaking, at a minimum, quarterly supervision.

Principle 6. Processes to respond to complaints and concerns are child-focused

- The Operations Manager creates a culture where complaints are taken seriously. All adults take responsibility for children's safety through our induction process and training staff in our culture.
- Operations Manager clearly explains that breaches of Codes of Conduct will result in disciplinary action at induction and ongoing as part of our training requirements.
- Staff are provided support and information on what and how to report, including external bodies.
- Accessible processes enable children, staff and others to make complaints. Procedures describe likely timeframes, review processes and potential outcomes of complaints.
- Complaints are handled confidentially (see Complaints and Feedback Policy and Procedure)
- Processes are reviewed at regular intervals, and after complaints are made
- Documents are confidential, where required.

Principle 7. Staff and volunteers are equipped with knowledge, skills and awareness to keep children and young people safe through continual education and training

- The Operations Manager provides ongoing education and training opportunities for all staff, including:
 - knowledge, skills and confidence to prevent and identify abuse
 - how to respond to complaints and escalate appropriately
 - if higher risks are identified, additional training is provided, e.g. behaviour management.
- The Operations Manager is our child safety officer responsible for training.
- Training is regularly reviewed in response to emerging best practices.

Principle 8. Physical and online environments promote safety and well-being while minimising the opportunity for children and young people to be harmed

- The Operations Manager sets expectations about behavioural standards for staff interacting with children in physical and online environments.
- Risk assessments identify areas where staff can interact with children unsupervised, including one-off events and overnight accommodation.
- Physical environments are altered to increase natural sight lines while respecting a child's right to privacy.
- Higher-risk areas (e.g. cars, boarding facilities and offsite locations) are managed using specific safety measures (e.g. spot checks).
- Children are provided information about online safety and regularly encouraged to tell staff about negative experiences.
- Children and young people will be supported to access age-appropriate digital safety education. Parents and families will be given information on risks such as online grooming,

cyberbullying, and safe device usage. Staff will follow the organisation's digital and social media guidelines at all times.

- Staff and parents are provided information about risks in the online environment (e.g. online grooming, cyberbullying and sexting).

Principle 9. Implementation of national child safe principles is regularly reviewed and improved

- The Operations Manager maintains a culture of continuous improvement to ensure that policies and procedures are implemented and routinely reviewed, even though staffing may change (see Continuous Improvement Policy).
- Operations Manager knows the value of continuous monitoring, open conversations and exploring new ways to keep children safe.
- Child-safe policies and practices are reviewed annually.
- Staff refer to the Standards when creating, reviewing or evaluating child-safe policies and procedures.
- Critical incidents are used to identify the root cause of the problem, identify risks to children's safety, and make improvements (see Incident Investigation Form).
- Children are supported to provide feedback, which is acted upon as required.

Principles 10 Policies and procedures document how the organisation is safe for children and young people

- The Operations Manager will ensure that policies and procedures are reviewed and compliant.
- Sirian Star Enterprises Pty Ltd acknowledges that we will be accountable for our policies and procedures.
- Staff are trained and knowledgeable about organisation procedures, especially how they relate to child safety.

Appendix C Code of Conduct

I will

- Comply with the NDIS Code of Conduct and ensure my behaviour aligns with the rights, dignity, and safety of every child or young person.
- Act following our child and young persons' safety and well-being policies and procedures.
- Behave respectfully, courteously, and ethically towards children, young people, families, and other staff.
- Listen and respond to the views and concerns of children and young people, particularly if they communicate (verbally or non-verbally) that they do not feel safe or well.
- Promote the human rights, safety and well-being of all children and young people in the service.
- Demonstrate appropriate personal and professional boundaries.
- Consider and respect the diverse backgrounds and needs of children and young people.
- Create an environment that promotes and enables children and young people's participation and is welcoming, culturally safe and inclusive for all children, young people and their families.
- Involve children and young people in making decisions about activities, policies and processes that concern them.
- Contribute, where appropriate, to policies, discussions, learning and reviews about child and young person's safety and well-being.
- Identify and mitigate risks to children and young person's safety and well-being as required by our risk assessment and management policy or process.
- Respond to any concerns or complaints of the child or young person's harm or abuse promptly and in line with our services policy and procedure for receiving and responding to complaints.
- Report all suspected or disclosed child and young person harm or abuse required by Children & Young People (Safety) Act 2017 and our policy and internal and external reporting procedure.
- Comply with our protocols for communicating with children.
- Comply with Children & Young People (Safety) Act 2017 and these policies and procedures on record keeping and information sharing.
- Adhering to our Child Safe Environment Policy at all times and taking all reasonable steps to ensure the safety and protection of children and young people.
- treating everyone (this includes staff, volunteers, students, children, young people and parents), including those of different races, ethnicity, gender, gender identity, sexual orientation, age, social classes, physical abilities or attributes and religious beliefs with respect and honesty and ensure equity is upheld.
- being a positive role model to children and young people in all your conduct with them
- setting clear boundaries about appropriate behaviour between yourself and the children and young people in your organisation – boundaries help everyone to understand their roles.
- listening and responding appropriately to the views and concerns of children and young people.

- ensuring another adult is always present or insight when conducting one-to-one coaching, instruction or other activity.
- being alert to children and young people who are or may be at risk of harm and reporting this quickly to the Child Abuse Report Line (13 14 78).
- responding quickly, fairly and transparently to any serious complaints made by a child, young person or their parent/guardian.
- encouraging children and young people to 'have a say' on issues that are important to them.

I will not

- Engage in any unlawful activity with or concerning a child and young person.
- Engage in any activity that is likely to physically, sexually or emotionally harm a child or young person.
- engage in rough physical games.
- develop any 'special' relationships with children and young people that could be seen as favouritism, such as the offering of gifts or special treatment.
- do things of a personal nature that a child or young person can do for themselves, such as toileting or changing clothes.
- discriminate against any child or young person because of age, gender, cultural background, religion, vulnerability or sexuality.
- Be alone with a child or young person unnecessarily.
- Arrange personal contact, including online contact, with children and young people I am working with for a purpose unrelated to our activities.
- Disclose personal or sensitive information about a child or young person, including images of a child or young person, unless the child, young person and their parent or legal guardian consent or unless I am required to do so by our policy and procedure on reporting.
- Use inappropriate language in the presence of children or young people, or show or provide children and young people with access to inappropriate images or material.
- Work with children and young people while under the influence of alcohol or prohibited drugs.
- Ignore or disregard any suspected or disclosed child or young person's harm or abuse.

If I notice or consider any person has breached this Code of Conduct, then I will

- Act to prioritise the best interests of children and young people.
- Take action promptly to ensure that children and young people are safe.
- Promptly report any concerns to my manager or another manager or leader in Sirian Star Enterprises Pty Ltd.
- Follow policies and procedures for receiving and responding to complaints and concerns.
- Comply with SA requirements if relevant and with policy and procedure on internal and external reporting.

I have read the Child Safe Environments Statement, Child Safety Standards, and this Code of Conduct and agree to abide by these requirements during my employment. I understand that breaches of this Code of Conduct may lead to disciplinary action or termination of my employment.

Name	
Position	
Date	

Adapted from Child Safety Organisations National Principles

Children and Young People Complaints and Feedback Policy and Procedure - South Australia

1.0 Purpose

The purpose of this policy is to ensure that children and young people receiving supports from Sirian Star Enterprises Pty Ltd feel safe, heard, and empowered to provide feedback or raise concerns in an environment that respects their rights, voice, and experiences. This policy aims to create a complaints culture where all feedback is seen as an opportunity for service improvement and is addressed in a manner that is inclusive, culturally safe, and accessible to all children, young people, families, and carers.

Sirian Star Enterprises Pty Ltd is committed to building trust by listening to the perspectives of children and young people and supporting them to speak up without fear. Complaints and feedback are essential to upholding a child-safe environment and achieving quality improvement across all services and supports.

2.0 Scope

The policy applies to all staff, contractors, volunteers, children, young people, families, carers and advocates involved with Sirian Star Enterprises Pty Ltd. It guides how complaints and feedback from children and young people are received, responded to, and used to improve services.

3.0 Definitions

Term	Definition
Complaint	A complaint should be interpreted broadly. It can include expressions of dissatisfaction about an organisation related to one or more of the following: its services or dealings with individuals; Allegations about the conduct of its staff, volunteers or other individuals engaged by the organisation; Another child or young person at the organisation or the handling of a prior concern
Complainant	The person who makes the complaint – child, young person, family member, advocate, staff member, volunteer, contractor or other stakeholders
Role	Role requirements
Complaints Manager	The role of the Complaints Manager is to: <ul style="list-style-type: none"> • manage the complaint process • manage reviews and make recommendations for continuous improvement using the information gained from the issue of the complaint

	<ul style="list-style-type: none"> ● stand independently from the management to allow participants and staff members to be able to make a complaint about the management of the organisation ● provide feedback and advice as required ● review the complainant's needs to ensure that their mode of communication is managed (e.g. Easy Read, large print, translated documents, etc.) ● collaborate with the complainant and their advocate ● keep all parties informed during all stages of the complaint management process ● handle all appeals related to the outcome of the complaint ● complete all necessary reports and documents, including providing information to complainants and management ● record all information in the Complaints Compliments and Feedback Register ● review the Complaints Compliments and Feedback Register at monthly management meetings
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4.0 Policy

Sirian Star Enterprises Pty Ltd is committed to ensuring that all children and young people can express their concerns, complaints, or feedback freely and safely. Our organisation will maintain a child-focused complaints process that is accessible, inclusive, and responsive. This policy is guided by the Children and Young People (Safety) Act 2017 (SA), NDIS (Complaints Management and Resolution) Rules 2018, and the NDIS Practice Standards, as well as the National Principles for Child Safe Organisations.

Sirian Star Enterprises Pty Ltd will:

- Appoint a designated Complaints Manager responsible for coordinating complaint handling, ensuring accessibility for all parties, and recording all outcomes in the Complaints Register and Continuous Improvement Register.
- Accept and respond to all feedback, regardless of whether it is submitted formally or informally, and treat it as valuable for service improvement.
- Provide child-appropriate resources to support understanding and engagement, such as the Child and Young People Handbook (Easy Read format), and include complaint guidance in participant and staff handbooks.
- Ensure complaints that involve reportable incidents are managed in line with the NDIS (Incident Management and Reportable Incidents) Rules 2018, and referred to appropriate authorities, such as the Department for Child Protection (DCP), where required.

- Respond to concerns using the principles of procedural fairness, including informing the individual of any issues raised, offering an opportunity to respond, and ensuring impartiality and transparency in the decision-making process.
- Treat all information with confidentiality and ensure protection from retribution or discrimination for complainants.
- Respect the child or young person's right to participate in the process, and actively involve families, carers or advocates where appropriate.
- Offer support to individuals who need help to make a complaint, including interpreters or advocacy services, and promote understanding of external complaint options, such as the NDIS Commission or Department of Human Services.

Staff will:

- Be trained on the complaints procedure and children's rights as part of induction and ongoing professional development.
- Recognise and respond to all complaints promptly, respectfully, and without bias.
- Help children and young people feel safe to speak up, and listen to their concerns with sensitivity and empathy.
- Use feedback to identify service improvements and refer issues to the Continuous Improvement cycle.
- Work with children and their families to find suitable solutions, keep them informed of progress, and explain the outcome of any complaint made.

This policy reflects our organisational commitment to continuous improvement, accountability, and child safety, and will be audited annually.

5.0 Procedure

5.1 Complaint management process

5.1.1 Complaint training and information sharing

We aim to prevent the necessity for complaints; prevention strategies to reduce the complaints include:

- training staff and volunteers in the different ways children and young people express concerns or distress and disclose harm
- establishing and training staff in our Code of Conduct
- ensuring staff and volunteers understand:
 - the Code of Conduct,
 - children and young people's expressions of distress,
 - knowledge of suspicions of real or potential harm,
 - how to assist children and young people in making complaints using the [Complaint Handling Guide: Upholding the rights of children and young people](#)

- complaints process and outcomes
- potential outcomes of any breach of the policy or Code of Conduct
- providing information about our services:
 - Easy-read formats for children and young people – Child and Young People Handbook
 - Participant Handbook to family or community members
 - Staff Handbook and training for staff

5.1.2 Complaint management process overview

The process and investigation must adhere to impartiality, privacy, confidentiality, transparency and timeliness. Complaints will not be discussed with anyone who does not have responsibility for resolving the issue. Sirian Star Enterprises Pty Ltd must consider any cultural and linguistic needs of a participant and provide the relevant support mechanism, such as an interpreter or similar.

Complainants are provided access to our Complaints and Feedback form, which may be accessed via our website, staff or management. The Complaints Manager will review the individual's needs and assist them using the best means to suit them. Children first are the centre of all actions relating to complaints or grievances.

The variance between individuals requires a personal approach but may include the following:

- offering an advocate
- providing text telephone (TTY) service to people with a hearing impairment
- ensuring the meeting site is wheelchair accessible
- offering independent assistance to read and write to formulate and lodge a complaint
- seek information from the complainant to determine any special requirements (e.g. access or communication)

5.1.3 Resolution Overview

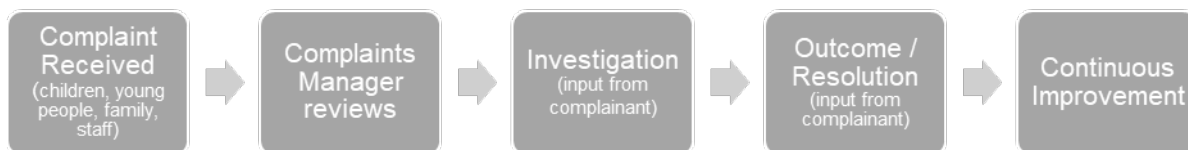
The resolution outcomes from a complaint will recognise that people who make a complaint are generally seeking one, or more, of the following outcomes:

- Acknowledgement:
 - genuinely listening without interruption
 - empathising
 - ensuring the complainant feels comfortable (e.g. being aware that staff may be defensive and consider how this is perceived)
 - acknowledgement of the effect of the situation on the individual
 - resolving to a good outcome
 - notifying regularly and promptly on steps undertaken
- Answers:

- clear explanations relevant to the issue, provided ONLY once all the facts are known
- Actions (Action Plan):
 - what will be done?
 - who will do it?
 - action plan completion date
 - how progress will be communicated to all parties involved
 - oversight of actions
- Apology:
 - consider the form of the apology and the managerial level of response
 - consider timeliness, sincerity
 - be specific and direct
 - accept responsibility if appropriate and provide information on the cause and impacts
 - explain without excuses
 - provide a summary of key actions to move forward and resolve the issue

5.2 Complaint process

Figure 1 Complaint Process Overview



Complaints and suggestions can be made by:

- using the Complaints and Feedback Form or the Anonymous Complaints and Feedback Form
- contacting a member of staff, verbally or in writing, our staff must offer to document the complaint on behalf of the participant if required and refer the matter to the Complaints Manager, verbally or in writing
- responding to questionnaires and surveys
- sending an email to our contact email
- attending meetings/care conferences
- contacting external complaint agencies, see 5.5 Unresolved Complaints
- communicating orally, in writing, or by any other relevant means.

Complaints may be made by:

- staff
- children and young people
- participants
- public
- advocates
- family members

- carers
- anonymous person/s

The Complaints Manager records results in the Complaints Compliments and Feedback Register, allowing input into our continuous improvement processes. The Continuous Improvement Register will record improvements established after the finalisation of the complaint management process.

If a complaint is about:

- Support or services: The Complaints Manager will deal with the complaint.
- Staff member/s: The Complaints Manager will deal with the complaint
- CEO/Manager: An external and independent person or body will be approached to manage.

Conflict of interest may occur if a complaint relates to senior management and the board (where one exists). To manage the real or perceived conflicts, we will:

- identify a real, perceived or potential conflict of interest
- follow the Complaints management process
- notify a senior manager or board member if a complaint is filed against them (unless there has been a confidentiality request)
- provide the individual with an opportunity to respond per the complaints management process

All staff, children, young people, family and advocates, visiting health professionals, and visitors are informed of our complaints process via:

- welcome information – Child and Young People Handbook, Participant Handbook
- initial access to support meetings
- staff orientation, induction and training
- meetings, reviews and assessments
- participant agreements
- staff agreements
- contractor agreements

5.2.1 Non-investigation complaint process

All complaints, where possible, will be managed directly and quickly at the point of service unless the complaint requires investigation (see the procedure outlined below). The non-investigation complaint process is as follows:

1. Issue reviewed by the Complaints Manager.
2. The complainant will be consulted, and the issue will be discussed to determine the actions required to resolve the issue. Sirian Star Enterprises Pty Ltd will offer complainant support from an independent advocate to reduce stress and anxiety during this process.
3. All available options will be discussed with the complainant and their advocate.
4. Where possible, a collaborative decision is finalised (i.e. acknowledgement, answer, action or apology).
5. The complainant is informed of the decision and the reasons for the outcome.
6. The complainant can seek to review the decision if they are unhappy with the resolution; this may lead to implementing the complaint investigation process.
7. If a complainant seeks a review, a review of the decisions may be resolved quickly by the Complaints Manager repeating the above points (2 to 5).

5.2.2 Verbal complaint was given to a frontline worker

If a frontline worker receives a verbal complaint, they must:

- contact the Complaints Manager at the first opportunity and before the end of their shift
- complete a Complaints and Feedback Form within 24 hrs on behalf of the complainant
- forward the completed Complaints and Feedback Form to the Complaints Manager immediately after completing the form

The following complaint investigation process is then undertaken.

5.2.3 Complaint investigation process

Step 1. Acknowledge

1. Acknowledge all complaints quickly, within one working day, where possible.

Step 2. Review of the complaint

1. Sirian Star Enterprises Pty Ltd will offer the complainant support from an independent advocate to reduce stress and anxiety at the beginning and throughout the process.
2. We will ensure that the child or young person is treated respectfully, courteously and sensitively to promote their safety (staff are appropriately trained and will refer to the [Complaint Handling Guide Upholding the Rights of Children and Young People](#) for guidance).

3. Involve the complainant and their advocate using a consultative process to ensure their voice, views and preferred outcomes are heard and discussed.
4. Determine the outcome the complainant seeks (i.e. acknowledgement, answers, actions or apology). Information will be used to ensure that the complainant's feedback and requirements are at the core of the complaint investigation and management process.
5. Inform the complainant of the following:
 - their right to an advocate and interpreter
 - the stages of the complaint management and decision-making process
 - mechanisms implemented to protect the complainant's privacy
 - their right to complain refer to 5.5. Unresolved Complaints at anytime
 - actual progress and outcomes of the investigation
6. Determine the type of complaint (i.e. service, support or process).
7. Notify the complainant and their advocate at each investigation stage and seek feedback.
8. If a consultative meeting is required, it will be held conveniently and in a safe environment, as determined by the complainant. The child or young person's record will be checked for a preferred contact for complaints. The child or young person will also be asked if they would like to nominate a staff member from Sirian Star Enterprises Pty Ltd who handles complaints to support them.
9. If the complainant is not satisfied with the reportable allegation response from the Complaints Manager and head of our organisation, then refer to 5.5 Unresolved Complaints.

Note: Service provision complaints are referred to the NDIS Commission.

Step 3. Assessing the complaint

1. When assessing a complaint, the Complaints Manager must prioritise the complaint and determine a resolution pathway (where required).
2. After the pathway is established, the complaint will be investigated.
3. Feedback from the complainant or their advocate must be used as part of this process (e.g. consultation meeting data).
4. When the complaint involves allegations of abuse, neglect or criminal conduct, the Complaints Manager will follow the Working with Children Policy and Procedure and the Reportable Incident, Accident and Emergency Policy and Procedure.
5. If the complaint is referred to the police or the Child Abuse Report Line (CARL) by the mandated notifier, then Sirian Star Enterprises Pty Ltd will not take any further action concerning the complaint until clearance is provided from these agencies.

Step 4. Investigation and decision making

1. When the complaint is lodged, the Complaints Manager should determine if it is practicable to find an immediate resolution (see 5.2.1 Non-investigation complaints process).
2. During the investigation and decision-making process, the Complaints Manager will:

- keep the complainant informed about each stage of the investigation process only if cleared by the police and CARL
- consult with the complainant to gather information about the underlying issue/s
- analyse antecedents and underlying issues when determining a decision
- review and approve all written reports and documents before they are sent out to all parties
- respond to the complainant with a clear decision and any next actions (if any)
- inform the complainant that they have the right to reject the outcome

Step 5. After the decision

1. After the investigation and a satisfactory response have been documented, the Complaints Manager will:
 - inform the complainant and their advocate of the decision, including the reason for the decision, and they will provide options for how the complainant can review the decision
 - ensure that the complaint investigation is satisfactorily completed
 - determine if the complainant is satisfied with the outcome
 - follow-up and consult with the complainant/s about any concerns
 - close out the complaint

5.2.4 Internal appeals

All internal appeal reviews are conducted by a delegated officer who was not involved in the original handling of the complaint. When conducting the internal appeal review, the following will be considered:

- the process adopted during the original complaint handling and whether it was fair and adequate to address all issues raised
- the basis for the decision/outcome made, including all available evidence to support the outcome, and whether the decision/outcome was properly explained to the complainant (including a child or young person if directly involved) or the complaint's subject

The delegated officer may:

- uphold the original decision
- change the decision
- refer the matter to the Complaints Manager for further investigation of issues raised or for exploring alternative dispute resolution options

5.3 Review and improvement

Sirian Star Enterprises Pty Ltd takes a systematic approach to incorporate a review of all issues raised by a complaint to identify and address any possible systemic issues and determine any continuous improvement actions identified during the complaints process. Management reviews the Complaints Register and Continuous Improvement Register during their meeting to ascertain changes required to policies and procedures to improve practices and ensure a child-first approach to our system.

The review and improvement process includes the following:

- ascertaining preventative actions and continuous improvement
- considering if any systemic issues require addressing
- recording the information regarding the complaint in the Complaints Compliments and Feedback Register
- recording the details of the improvement stemming from a complaint in the Continuous Improvement Register (if required)
- training staff in any new systems or actions
- adjusting policies and procedures
- monitoring the complaint resolution according to the internal audit schedule
- providing feedback to the complainant personally to inform them of the outcomes and influences of their issue raised within our organisation

5.4 Documentation

All staff are provided training regarding the complaints process during orientation and ongoing training sessions, including Complaint Handling Guide: Upholding the rights of children and young people.

The complaints process is available for children, young people, families, carers and advocates via the information provided in relevant handbooks – Child and Young People, Participant and Staff and through the provision of Easy Read documents (as required).

Documentation of the complaint process is as follows:

- All complaints will be recorded in the Complaints Compliments and Feedback Register. Information in the register will include the following:
 - complaint details
 - identified issues
 - actions are undertaken to resolve the complaint
 - the outcome of the complaint.
- All documents, including the Complaint and Feedback Forms, are uploaded into the computer system.
- Copies of any information provided to the complainant are stored in their relevant file.

- All documents are confidential, and access is only permitted to employees relevant to the complaint. The Complaints Manager determines who is relevant.
- A copy of all complaint documents will be retained in the file for seven years from the record date.
- Statistical and other information will be collected to:
 - review issues raised
 - identify and address systemic issues
- A policy review will occur if legislative changes are determined by a regular or annual internal audit review.

In accordance with NDIS requirements, all complaints, feedback and associated records must be retained for a minimum of 7 years and stored securely in the complaints register.

5.5 Unresolved complaints

Unresolved complaints will be referred to the Complaints Manager for investigation and resolution. Should the complaint not be resolved to the complainant's satisfaction, the complaint will be escalated to a person nominated by the complainant (with the complainant's permission).

When complaints cannot be resolved internally, the complainant may be referred to the following:

- **Health and Community Services Complaints Commissioner**
 - Phone [1800 232 007](tel:1800232007)
 - [Health and Community Services Complaints Commissioner website](#)
- **The Public Advocate**
 - Phone [8342 8200](tel:83428200)
 - [The Public Advocate website](#)
- **Department for Child Protection (DCP)**
 - Phone: 13 14 78 (Child Abuse Report Line)
 - [Department for Child Protection](#)
- **NDIS Quality and Safeguards Commission**
 - Phone: 1800 035 544 (free call from landlines) or TTY 133 677
 - National Relay Service and ask for 1800 035 544
 - Interpreters can be arranged
 - An NDIS Complaint Contact Form can be completed online at business.gov.au

Where applicable, complaints may also be escalated to the relevant State or Territory Children's Commissioner, Ombudsman, or Child Protection Authority, particularly where child safeguarding concerns are involved.

5.6 Staff orientation and training

The staff orientation process includes training all employees in complaints and feedback. Our training includes:

- Complaints Handling Guide: Upholding the rights of children and young people
- reporting requirements and contacts details – mandatory notifiers
- providing information regarding Sirian Star Enterprises Pty Ltd's complaint and feedback process and procedures (e.g. forms to complete and how to assist participants wishing to make a complaint)
- identifying our Complaints Manager
- accessing complaint information to share with children, young people, families and stakeholders
- support techniques when working with children, young people and families
- encouraging staff to have a positive attitude towards complainants and a commitment to resolving all complaints
- creating an understanding of how feedback and complaints inform and guide our continuous improvement cycle
- understanding timeframes for reporting and resolving complaints

Additional training will occur when practices and policies are changed due to a complaint or if staff are still unsure how to handle a complaint upon commencing work at Sirian Star Enterprises Pty Ltd.

6.0 Related documents

- Complaint and Feedback Form
- Anonymous Complaint and Feedback Form
- Complaints Process Checklist
- Complaints Compliments and Feedback Register
- Continuous Improvement Register
- Continuous Improvement Plan
- Participant Handbook
- Child and Young People Handbook
- Staff Handbook
- Staff Training Record
- Staff Training Plan
- Training Attendance Register – In-house
- Annual Organisational Training Register and Review
- Risk Management Policy and Procedure
- Service Agreement

7.0 References

- NDIS (Complaints Management and Resolution) Rules 2018
- NDIS Practice Standards and Quality Indicators 2020
- NDIS Act 2013 (Commonwealth)
- NDIS (Procedural Fairness) Guidelines 2018
- Privacy Act 1988 (Commonwealth)
- Work Health and Safety Act 2011 (Commonwealth)
- Complaint Handling Guide: Upholding the rights of children and young people
- National Principles for Child Safe Organisation
- Children and Young People (Safety) Act 2017 (SA)
- Child and Young Person (Safety) Regulations 2017 (SA)
- Child Safe Environments Policy Guidelines (SA Department of Human Services)

NDIS Worker Screening and Risk Assessed Roles Policy and Procedure

1.0 Purpose

The purpose of this policy is to ensure that all staff performing risk-assessed roles within Sirian Star Enterprises Pty Ltd meet the NDIS worker screening requirements, and that all workers who support or interact with participants uphold the highest standards of safety and suitability. Worker screening is one of the key safeguards to help protect people with disability from harm.

This policy outlines how risk-assessed roles are identified, how worker screening is verified and recorded, and the responsibilities of both management and workers in maintaining ongoing compliance with screening requirements. The policy also reinforces our commitment to providing a safe and high-quality service environment for all participants.

2.0 Scope

The policy applies to all staff Sirian Star Enterprises Pty Ltd performing duties in a risk-assessed role.

3.0 Definitions

Term	Definition
A risk-assessed role	<p>A key personnel role (person or an entity) as defined in s11A of the National Disability Insurance Scheme Act 2013 (e.g. a CEO or a Board Member) as:</p> <ul style="list-style-type: none"> ● a role for which the regular duties include the direct delivery of specified supports or specified services to a person with a disability ● a role for which the regular duties are likely to require 'more than incidental contact with people with disability, which includes: <ul style="list-style-type: none"> ○ physically touching a participant ○ building a rapport with a participant is an integral and ordinary part of the performance of normal duties ○ Contact multiple participants as part of the direct delivery of a specialist disability support or service or in a specialist disability accommodation setting.

Term	Definition
Contractor	When the NDIS provider engages another organisation or individual to perform work on their premises (or otherwise) as part of their support and services provision. The organisation or individual is considered a contractor with the registered NDIS provider.
Exceptions/exemptions	<p>A registered NDIS provider may engage a person in a risk-assessed role, who does not have a NDIS Worker Screening clearance, only if the registered NDIS provider is subject to the transitional and unique arrangements and the registered NDIS provider is complying with those arrangements.</p> <p>A registered NDIS provider can also allow secondary school students on a formal work experience placement to engage in risk-assessed roles without having a NDIS Worker Screening clearance or an acceptable check under the transitional and special arrangements, provided the students are directly supervised by another worker who has a NDIS Worker Screening clearance or acceptable check under the transitional and special arrangements.</p>
Worker Screening Check	<p>The WSC is an assessment of whether a person who works, or seeks to work, with participants poses a risk.</p> <p>The worker screening check assessment determines whether a person is cleared or excluded from working in specific roles with participants.</p>
Worker Screening Unit (WSU)	<p>The Worker Screening Unit conducts the NDIS Worker Screening Check in the state or territory where a person applies.</p> <p>The Worker Screening Unit also decides whether a person is cleared or excluded.</p> <p>Registered NDIS providers must only engage workers who have been cleared in specific risk-assessed roles.</p>
Key Personnel	Key personnel are individuals who hold key decision-making roles within the registered provider, such as directors, CEOs, or Board members.
National NDIS Worker Screening Database	<p>The National NDIS Worker Screening Database:</p> <ul style="list-style-type: none"> • holds a register of cleared and excluded workers

Term	Definition
	<ul style="list-style-type: none"> ● supports ongoing national monitoring of the criminal history records of workers with NDIS Worker Screening clearances ● means NDIS providers across the country can use a single online portal to verify their workers' Worker Screening Check applications and review the NDIS Worker Screening clearances of prospective workers without needing to contact individual state and territory Worker Screening Units ● helps NDIS providers with record-keeping requirements.

4.0 Policy

Sirian Star Enterprises Pty Ltd is committed to meeting its obligations under the [National Disability Insurance Scheme \(Practice Standards – Worker Screening\) Rules 2018](#), the NDIS Practice Standards and Quality Indicators 2021, and applicable state or territory worker screening legislation.

All roles considered risk-assessed are identified and documented by the **Operations Manager**, who is also responsible for verifying worker screening clearances through the National Worker Screening Database (NWSDB). This verification must occur prior to the individual commencing in a risk-assessed role.

A risk-assessed role is one that includes the direct delivery of NDIS supports or services to participants, or involves more than incidental contact with participants, including physical contact, face-to-face engagement, or access to personal and confidential information.

All individuals performing in a risk-assessed role must hold a current and valid NDIS Worker Screening Check, obtained through the relevant state or territory Worker Screening Unit (WSU). Applications must be submitted by the worker and linked to Sirian Star Enterprises Pty Ltd. The **Operations Manager** or their delegate will record and manage this information in the following registers and forms:

- Contractor Risk Assessed Check Form
- Risk Assessed Role Register
- Risk Assessed Role – Employee Register

Sirian Star Enterprises Pty Ltd will not allow any person to commence or continue in a risk-assessed role unless they hold a valid clearance. Where an individual receives an adverse screening outcome (e.g., interim bar, suspension, or exclusion), they will be immediately removed from the role and prohibited from further engagement until resolved.

All workers are required to comply with the NDIS Code of Conduct, which includes acting with integrity, respect, and promoting safe, inclusive, and quality services. Ongoing training and supervision will support staff to meet their responsibilities under this policy.

The following table lists the NDIS registration groups that may have risk-assessed roles.

Table 1. Supports and services that may have risk-assessed roles as described by the NDIS

Descriptor
Assistance to access and maintain employment or higher education
High-intensity daily personal activities
Assistance in coordinating or managing life stages, transitions and supports
Assistance with daily personal activities
Assistance with travel/transport arrangements, but only if the services concern specialised transport to school/educational facility/employment/community (does not include public services, i.e. taxi, bus and train)
Specialist positive behaviour support
Community nursing care
Assistance with daily life tasks in a group or shared living arrangement
Innovative community participation
Development of daily living and life skills
Early intervention supports for early childhood
Specialised hearing services
Interpreting and translating
Participation in community, social and civic activities
Exercise physiology and personal training
Management of funding for supports in participant plans
Therapeutic supports
Specialised driver training
Specialised support coordination
Specialised supported employment
Hearing services
Customised prosthetics
Group and centre-based activities

Only employees who work in risk-assessed roles require worker screening clearances. Sirian Star Enterprises Pty Ltd is not required to verify that employees, who do not work in risk-assessed roles, have a NDIS worker screening clearance.

5.0 Procedure

5.1 Risk-assessed role

The **Operations Manager** will determine whether the regular duties of a role involve more than incidental contact with a participant; this may include:

- physical contact
- face-to-face contact
- oral communication
- written communication
- electronic communication

The **Operations Manager** will review every role within Sirian Star Enterprises Pty Ltd and identify and record all risk-assessed roles in the Risk Assessed Role Register. Staff identified as working in a risk-assessed role will undergo the appropriate worker screening checks, and all clearance check details are recorded in the Risk Assessed Role – Employee Register.

Risk-assessed roles will be reviewed:

- As part of regular organisational reviews,
- Whenever there are significant role or duty changes,
- Following any incident that raises concerns about role-based risks

Contractors engaged for risk-assessed roles must provide evidence of current worker screening checks and be monitored for compliance through the Contractor Risk Assessed Check Form.

Roles determined as not risk-assessed are not required to hold worker screening clearances.

5.1.1 Documenting a risk-assessed role

The **Operations Manager** will complete the Risk Assessed Role Register for each risk-assessed role and will document the following:

- risk assessed role title
- description of the role
- type of risk-assessed role (as contained in the NDIS (Practice Standards - Worker Screening) Rules 2018)
- date risk assessed role determined
- employees who are role assessed

- the name and title of the person who made the assessment.

5.1.2 New reclassification of risk-assessed role

When a new risk-assessed role is identified (or a current role is reclassified as a risk-assessed role following a review), the Risk Assessed Role Register must be updated within 20 business days of the identification (or review) of the risk-assessed role.

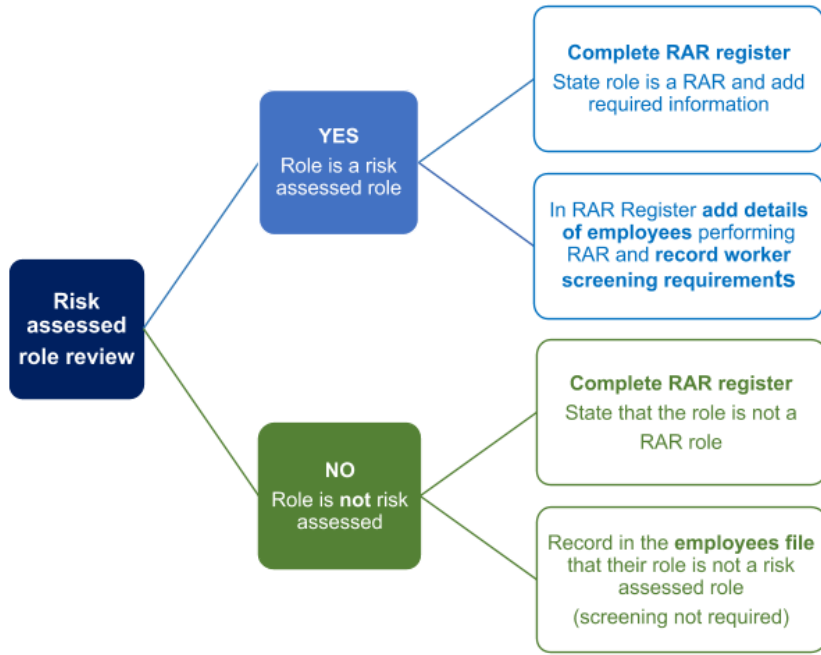
5.1.3 Worker risk assessed role checks

No worker will commence work in a risk-assessed role until their NDIS Worker Screening Check clearance is verified, recorded, and confirmed as current and valid.

The **Operations Manager** or their authorised delegate will document all relevant details in the Risk Assessed Role – Employee Register for each employee in a risk-assessed role. Information documented includes:

- the full name, date of birth and address of the employee
- the risk-assessed role or roles in which the employee engages
- if the worker may engage in a risk-assessed role without a NDIS worker screening clearance:
 - the basis on which they may do so (refer to sections below regarding the exemptions to the requirement for a worker to have a NDIS Worker Screening clearance)
 - the start and end date of the period in which the exemption that allows them to work in a risk-engaged role applies
- the name of the staff member who supervises the worker during this period
- the worker's NDIS Worker Screening Check application reference number
- the worker's NDIS Worker Screening Check the outcome expiry date
- whether the worker's NDIS Worker Screening Check is subject to any decision which affects that Sirian Star Enterprises Pty Ltd may not allow the worker to engage in a risk-assessed role, and the nature of any such decision (i.e. interim bar, suspension, exclusion)
- records relating to an interim bar, a suspension, an exclusion, or any action taken by the provider concerning these kinds of decisions concerning any worker
- allegations of misconduct against a worker with a check and the registered NDIS provider's action in response to that allegation

Table 1. Internal review process



5.1.4 Engaging contractors

All contractors and subcontractors engaged to perform work in a risk-assessed role must hold a valid NDIS Worker Screening Check clearance before the commencement of services.

When engaging contractors, Sirian Star Enterprises Pty Ltd will work with the contractor to ensure those contractor workers (including individual contractors) have the required worker screening checks and clearances.

When working with contractors, the **Operations Manager** or their delegate will complete a Contractor Risk Assessed Check Form.

5.2 NDIS Worker Screening

All workers employed in a risk-assessed role must apply for a NDIS Worker Screening Check with the state's Worker Screening Unit. The Worker Screening Unit manages the application process and collects the required fee.

The **Operations Manager** or a delegated staff member must verify each worker's screening status via the NDIS Commission Portal, which is linked to the National Worker Screening Database (NWSD).

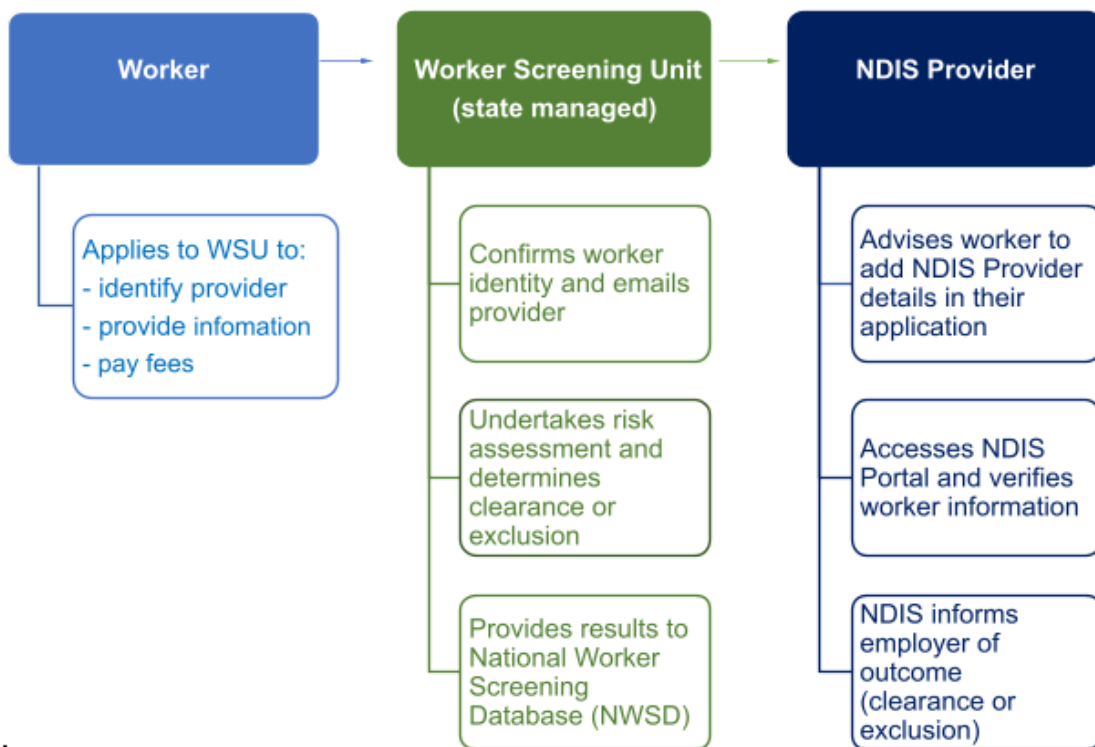
The NWSD will notify Sirian Star Enterprises Pty Ltd of the outcome of the screening (clearance or exclusion). Workers must not commence in a risk-assessed role until their clearance is verified and recorded.

If the NWSD issues a worker exclusion, or notifies of any adverse decision or change in clearance status, the **Operations Manager** must immediately:

- Withdraw the worker from all risk-assessed duties, and
- Update the Risk-assessed Role - Employee Register accordingly

All clearances, dates, renewal periods, and risk-assessed status must be recorded and monitored by Sirian Star Enterprises Pty Ltd in compliance with the NDIS (Practice Standards – Worker Screening) Rules 2018.

Diagram 2. Risk-Assessed Role - NDIS Worker Screening Process



In addition to undergoing a NDIS Worker Screening Check and a National Police Check, staff who engage in child-related work or support participants under the age of 18 may also be required to obtain a Working with Children Check (or equivalent), as mandated by their relevant state or territory legislation.

Sirian Star Enterprises Pty Ltd will ensure compliance with all applicable state-based Working with Children Check laws, and verify the status of each check prior to a worker commencing in a child-related risk-assessed role.

For more information regarding worker screening, refer to Appendix 1. Worker Screening Unit or Appendix 2. NDIS Worker Screening Application Overview.

5.3 Risk management

As a registered NDIS provider, Sirian Star Enterprises Pty Ltd is required to develop, implement and maintain risk management strategies to ensure our participants' safety. Risk management strategies for risk-assessed roles will be recorded in our Risk Management Plan.

Risk management processes for risk-assessed roles are part of Sirian Star Enterprises Pty Ltd's broader safeguarding and incident prevention strategies.

Any concerns, including adverse screening outcomes or allegations against workers in risk-assessed roles, will be managed following the NDIS Incident Management and Reportable Incidents Rules 2018.

Sirian Star Enterprises Pty Ltd's Risk Management Plan Register will:

1. Identify the risks relating to:
 - non-supervision of a worker during the delivery of services or supports
 - safety of our participants
 - a participant is injured or not receiving the necessary support they need
2. Outline actions to be taken by our organisation to address risks, which may include the **Operations Manager**:
 - identifying if the employee has any current worker screening clearances
 - allocating an appropriate supervisor to the employee to monitor their work until worker screening clearances are received
 - check references and seek additional information about employees in risk-assessed roles to confirm they understand and perform safe work practices

5.4 Document records

Sirian Star Enterprises Pty Ltd will keep all documents up to date. Records will be kept for seven years from the date they were made. Records will be stored by Sirian Star Enterprises Pty Ltd on a secure, password-protected server in an organised, accessible and legible manner.

Information relating to workers engaged in a risk-assessed role will be kept in an easily accessible manner to the NDIS Commission or a quality auditor. Information will include workers engaged on any day over the previous seven years.

6.0 Related documents

- Risk Assessed Role Register
- Risk Assessed Role – Employee Register
- Contractor Risk Assessed Check Form
- Personnel File Contents Checklist
- Risk Management Plan Register
- Human Resource Management Policy and Procedure
- Participant Safeguarding Policy
- Reportable Incident, Accident and Emergency Policy and Procedure
- Complaints and Feedback Policy and Procedure

7.0 References

- NDIS (Practice Standards – Worker Screening) Rules 2018
- NDIS Practice Standards and Quality Indicators 2021
- NDIS Code of Conduct (2018)
- NDIS Quality and Safeguarding Framework
- National Disability Insurance Scheme Act 2013 (Commonwealth)
- NDIS (Incident Management and Reportable Incidents) Rules 2018

Appendix 1: State Worker Screening Units – SA

1.0 State worker screening units

For information about how to apply for a Worker Screening Check, visit the WSU webpage for the relevant state or territory via the link:

State	State Worker Screening Unit (Web Link)
South Australia	<u>Department of Human Services</u>

2.0 Conclusion of Transitional Worker Screening Arrangements

The transitional arrangements for worker screening under the NDIS (Practice Standards – Worker Screening) Rules 2018 have concluded, with end dates varying by state and territory. All workers engaged in risk-assessed roles are now required to hold a verified NDIS Worker Screening Clearance prior to commencing work. Alternative state-based clearances (e.g., Working With Children Checks, Blue Cards, Yellow Cards) are no longer accepted as substitutes for a NDIS clearance.

Sirian Star Enterprises Pty Ltd adheres to a strict 'No Clearance, No Start' policy in alignment with NDIS Commission requirements.

Appendix 2 NDIS Worker Screening Application Overview

South Australia
<p>The applicant must start NDIS checks.</p> <p>A Working with Children check may be required if working with children under 18 years.</p>
<p>Screening Unit checks are done online</p> <p>NDIS worker checks must be started by the person and then verified by their NDIS employer (NDIS provider or self-managed participant) through the employer NDIS Commission portal.</p>
<p>Before you start</p> <p>Once the applicant initiates their NDIS Worker Check application, they will receive an email from the SA Government's online services (Account Security - forms.sa.gov.au). This email will prompt them to set up a password to access their account. The application must be completed and submitted within 28 days, or it will be deleted and must be restarted.</p> <ul style="list-style-type: none"> ● The email will be called: Setup your account at forms.sa.gov.au. ● This email will tell the applicant to change their password. They can then begin their application. ● They must complete and apply within 28 days, or the application will be deleted, and they will need to start the application again.
<p>What is needed to complete an application?</p> <ul style="list-style-type: none"> ● Information about the applicant's full legal name and any names they may have, including previous names, maiden name, names that have been legally changed, aliases and informal names (like nicknames). ● Current address and ten (10) years of address history. ● If verifying their identity online (100-point check, an applicant will need an Australian driver's licence or permit, plus one of these: <ul style="list-style-type: none"> ○ Australian birth certificate or extract ○ Australian citizenship certificate ○ Australian passport ● Note the three options for verification: <ul style="list-style-type: none"> ○ Online using original scanned identity documents. ○ Verified by a permitted verifier (usually a provider). ○ Postal application with certified hard copies of ID
<p>Proof of identity</p> <p>Individuals applying for a check must provide 100 points of identification in line with DHS SA Screening Unit requirements to prove their identity. This requirement also applies to sole traders, contractors and self-employed people. There are three ways to provide 100 points of identification:</p>

South Australia

1. Provide an Australian driver's licence, a current Australian passport, an Australian birth certificate or an Australian citizenship certificate.
2. A permitted verifier from the provider starting a check application online can provide information for the 100-point identification check on behalf of an individual.
3. If one of the options above is not possible, the worker or the employee can:
 - o print a copy of a fully paid online check application
 - o show original identity documents to an independent permitted verifier
 - o mailed the completed application and signed copies of identity documents to the Screening Unit

100-point identification check documents

The combination of identity documents must include the individual:

- full name
- date of birth
- photograph
- relevant documents from either Category A or Category B below.

When an individual does not have a photographic identity document, they must submit a passport-style photograph that has been certified by an individual listed in Schedule 2 of the Statutory Declarations Regulations 1993.

Category A – each document is worth 70 points

Only one document from this category is accepted:

- Birth certificate (not an extract)
- Australian passport (current or expired within the previous two years but not cancelled)
- Australian citizenship certificate
- International passport (current or expired within the previous two years but not cancelled)
- Other identity documents with the same characteristics as a passport, e.g. diplomatic/refugee (photo or signature)

Category B – the first document is worth 40 points. Each additional document is worth 25 points

- Current driver's licence or permit (government-issued).
- Working with children/teachers' registration cards.
- Aviation security identification card/maritime security identification card.
- Public employee photo ID card (government-issued).
- Department of Veterans' Affairs card.
- Centrelink pensioner concession card or health care card.
- Current tertiary education institution photo ID.

South Australia

- Reference from a medical practitioner (who has known the individual for at least 12 months).

Category C – each document is worth 25 points

- Birth certificate extract.
- Foreign/international driver's licence.
- Proof of age card (government-issued).
- Medicare card/private health care card.
- Council rates notice.
- Property lease/rental agreement.
- Property insurance papers.
- Australian Tax Office assessment.
- Superannuation statement.
- Seniors card.
- Electoral roll registration.
- Motor vehicle registration or insurance documents.
- Professional or trade association card.
- If relied upon, the following documents must be from different organisations:
 - Utility bills (telephone, gas, electricity, water)
 - Credit/debit card
 - Bank statement/passbook

Once the applicant submits their application, their NDIS employer (provider or self-managed participant) must verify the application through the NDIS Commission's Worker Screening Database (NWSD). This step is mandatory for the screening unit to process the application.

Workers must not commence in a risk-assessed role until their NDIS Worker Check has been verified and cleared through the NWSD. This complies with the No Clearance, No Start requirements under the NDIS Worker Screening Rules.

Zero Tolerance Policy and Procedure

1.0 Purpose

The purpose of this policy is to clearly express Sirian Star Enterprises Pty Ltd's unwavering commitment to protecting the safety, rights, and wellbeing of all people with disability, including children and young people, who access our services.

We uphold a zero-tolerance approach to any form of abuse, harm, neglect, exploitation, discrimination, or violence. This policy outlines our organisation's commitment to proactively prevent, identify, and respond to concerns and incidents in a way that promotes safety, empowerment, and continuous improvement.

Creating an environment where every person feels safe, supported, and heard is central to our values and operations.

2.0 Scope

The policy applies to all staff who are engaged by Sirian Star Enterprises Pty Ltd in any capacity.

3.0 Definition

Term	Definition
Zero tolerance	<p>It refers to an organisational commitment to prevent and respond to all forms of violence, abuse, neglect, exploitation, and discrimination of people with disabilities, including children and young people. It encompasses proactive measures to create a safe environment and mandatory obligations for all workers under the NDIS Code of Conduct to report abuse and uphold participants' rights to dignity, respect, and safety.</p> <p>It aims to provide an evidence-based, nationally applicable and contemporary approach to preventing and responding to abuse, harm and risk of harm of people with disabilities.</p> <p>The aim is to assist service providers in developing positive organisational cultures and practices and robust safeguarding mechanisms relevant to the National Disability Insurance Scheme (NDIS).</p> <p>Zero tolerance applies to participants regardless of age.</p>

4.0 Policy

Sirian Star Enterprises Pty Ltd is committed to upholding all obligations under the NDIS Code of Conduct, the NDIS (Incident Management and Reportable Incidents) Rules 2018, the NDIS Practice Standards and Quality Indicators, the National Principles for Child Safe Organisations, and all applicable state and territory safeguarding and abuse prevention legislation.

Our zero-tolerance approach ensures that no form of abuse, neglect, harm, or exploitation is ever accepted. Every concern raised is acted upon appropriately and sensitively, with participants' safety and wellbeing at the centre of our response.

To support this commitment, Sirian Star Enterprises Pty Ltd will:

- Train all staff on their obligations under the NDIS Code of Conduct and relevant safeguarding frameworks, including mandatory reporting responsibilities
- Promote a workplace culture in which the safety and dignity of participants is prioritised at all times
- Equip workers to maintain accurate, up-to-date support documentation and follow best-practice safeguarding strategies
- Respond swiftly and appropriately to all disclosures, suspicions, or indicators of abuse or harm
- Ensure no staff member, volunteer, or participant is ever penalised or silenced for reporting concerns or making a complaint
- Apply disciplinary procedures fairly and in accordance with procedural fairness if staff fail to meet their obligations
- Promote inclusive, culturally safe practices and respect for all people with disability, including those from Aboriginal and Torres Strait Islander backgrounds, CALD communities, LGBTQIA+ participants, and people with complex support needs
- Maintain an open, supportive complaints culture in which participants and their families feel safe to speak up

Staff are expected to:

- Provide services that are free from abuse, exploitation, harassment, or neglect
- Immediately report any concerns regarding abuse or harm, including those that relate to other staff, participants, families, carers, or the community
- Never engage in sexual misconduct or allow such behaviour to go unreported
- Respect participants' rights, cultures, autonomy, and dignity of risk
- Demonstrate integrity, honesty, transparency, and ethical conduct in all professional interactions

This policy is supported by our related documents, including but not limited to the Reportable Incident, Accident and Emergency Policy and Procedure, Complaints and Feedback Policy and Procedure, and Child Safe Environment Policy and Procedure.

5.0 Procedure

Sirian Star Enterprises Pty Ltd will train staff to understand and act on a zero-tolerance approach and their mandatory reporting role and ensure that staff appreciate participants are people first, with needs, aspirations, preferences and feelings.

All staff must listen to participants to determine their preferences, aspirations, needs, and supports (where it is safe).

Sirian Star Enterprises Pty Ltd will ensure that staff are informed that people with disabilities, children and young people tend to face significantly higher risks of sexual assault and exploitation than the general population. This fact is particularly true for women with a disability. Also, disclosure barriers make it difficult for a person with a disability to report sexual abuse and misconduct. Staff must be sensitive to the symptoms and causes of various types of abuse that affect all participants, including children and young people (see Working with Children Policy and Procedure).

5.1 Reporting abuse or harm

Sirian Star Enterprises Pty Ltd acknowledges that reporting harm, risk of harm or abuse is critical to prevent abusive or harmful situations from escalating and recurring among participants.

Sirian Star Enterprises Pty Ltd staff who work with participants will report any harm and abuse (zero tolerance) following the reporting procedures outlined in the Violence, Harm, Abuse, Neglect, Exploitation and Discrimination Policy and Procedure or Working with Children Policy and Procedure. Staff will refer to the reporting procedures outlined in the Reportable Incident, Accident and Emergency Policy and Procedure when reporting a reportable incident, noting that all real or potential harm or abuse is reportable.

6.0 Related documents

- Child and Young People Handbook
- Code of Conduct Agreement
- Incident Investigation Form
- Incident Register
- Incident Report
- Risk Assessment Form
- Risk Management Plan Register
- Staff Training Record
- Staff Training Plan
- Training Attendance Register – In-house
- Annual Organisational Training Register and Review
- Violence, Harm, Abuse, Neglect, Exploitation and Discrimination Policy and Procedure
- Reportable Incident, Accident and Emergency Policy and Procedure
- Working with Children Policy and Procedure
- NDIS Worker Screening and Risk Assessed Roles Policy
- Participant Safeguarding Policy
- Complaints and Feedback Policy and Procedure

7.0 References

- NDIS Practice Standards and Quality Indicators 2021
- National Standards for
- Disability Discrimination Act 1992 (Commonwealth)
- Disability Services Act 1986 (Commonwealth)
- Privacy Act 1988 (Commonwealth)
- NDIS (Incident Management and Reportable Incidents) Rules 2018
- NDIS Code of Conduct (2018)
- NDIS Quality and Safeguarding Framework
- Australia's Disability Strategy 2021–2031
- National Disability Insurance Scheme Act 2013 (Commonwealth)