



## VULNERABLE PEOPLE POLICY

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### 1. PURPOSE

To establish the principles relating to protecting the safety of children and vulnerable adults at Morling College (MC), and those encountered by Morling Community members carrying out their MC related duties.

### 2. DEFINITIONS

The following definitions apply for the purpose of this policy:

Key Term of Acronym	Definition
Abuse	Includes abuse, neglect or exploitation. All forms of physical and mental abuse, exploitation, coercion or ill-treatment. Including but not limited to: <ul style="list-style-type: none"> <li>sexual harassment, bullying or abuse;</li> <li>sexual criminal offences and serious sexual criminal offences;</li> <li>threats of, or actual violence, verbal, emotional or social abuse;</li> <li>cultural or identity abuse, such as racial, sexual or gender-based discrimination or hate crime;</li> <li>coercion and exploitation;</li> <li>abuse of power; or</li> <li>political or religious abuse/harassment.</li> </ul>
Board	The governing Board of Morling College.

C-Suite Officer	The chief officers; currently the Chief Administrative Officer, Chief Operating Officer, Vice-Principal (Academic) and Vice-Principal (Students and Community)
CAdO	Chief Administrative Officer
Carer	Person with charge of a child not related to MC activities, including parents, guardians, and authorised caretakers
Child	A person under 18 years of age
JDF	Job Description Form; describes the duties and responsibilities of a job.
Mandatory Reporter	Those in professions obligated to fulfill mandatory reporting requirements.
Mandatory Reporting	Legally required reporting of known or suspected cases of child abuse. Those required to report (see 'mandatory reporter') and the types of abuse required to be reported varies between states. See: <ul style="list-style-type: none"> <li>NSW: <a href="https://reporter.childstory.nsw.gov.au/s/mrg">https://reporter.childstory.nsw.gov.au/s/mrg</a></li> <li>WA: <a href="https://www.wa.gov.au/service/community-services/community-support/mandatory-reporting-of-child-sexual-abuse-wa">https://www.wa.gov.au/service/community-services/community-support/mandatory-reporting-of-child-sexual-abuse-wa</a></li> <li>QLD: <a href="https://www.dcssds.qld.gov.au/our-work/child-safety/about-child-protection/mandatory-reporting">https://www.dcssds.qld.gov.au/our-work/child-safety/about-child-protection/mandatory-reporting</a></li> </ul>
MC	Morling College
Morling Community	Relates to MC staff and students, residents, and all others engaging with MC, including visitors, contractors and volunteers.
Morling Village	Housing on Sydney campus excluding MRC
MRC	Morling Residential College
Reportable Allegation	A reportable allegation is an allegation that the employee has engaged in conduct that may be reportable conduct. There does not need to be any proof that the alleged conduct occurred, or that it is likely to have occurred.
Reportable Conduct	Conduct of a worker (state specific definitions apply) covered under the reportable conduct scheme, such as: <ul style="list-style-type: none"> <li>sexual offences against, with or in the presence of, a child</li> <li>sexual misconduct against, with or in the presence of, a child</li> <li>physical assault against, with or in the presence of, a child</li> <li>significant neglect of a child</li> <li>significant emotional or psychological harm to a child.</li> </ul>
Reportable Conviction	Convictions of an offence involving reportable conduct.
Resident	A person residing at MRC or Morling Village (Sydney campus) or any other MC owned accommodation, both fixed-term and temporary.
Staff	Employees of Morling College, including permanent, fixed term or casual.
Student	A person enrolled in study at Morling College, including audit and single unit
VP(SC)	Vice-Principal (Students and Community)
Vulnerable adult	An adult who is or may be unable to take care of themselves against harm, exploitation or discrimination by reason of age, illness, trauma or disability or any other reason, including disadvantage due to social or financial hardship or power imbalance in their circumstances.

Vulnerable person	a. a child b. a vulnerable adult
WIL	Work integrated learning
WWCC	Working with Children Check

### 3. SCOPE

This policy applies to all members of the Morling Community who are a vulnerable person or have contact with vulnerable people as part of their MC related activities.

### 4. POLICY STATEMENT

- 4.1 MC recognises that God sees and cares for vulnerable people, and encourages his followers to their agency, advocacy, aid and protection.
- 4.2 MC takes a zero-tolerance approach to any behaviours that jeopardise a vulnerable person's safety, including all forms of abuse.
- 4.3 MC is committed to developing a culture and providing an environment which protects the safety, welfare, and wellbeing of vulnerable people engaged with by the Morling Community, free from and kind of abuse, discrimination and harassment.
- 4.4 MC is committed to creating and maintaining an environment where every member of the community is enabled and encouraged to report abuse.
- 4.5 MC will endeavour to offer supportive and respectful services and interactions where vulnerable people are genuinely engaged and where the likelihood of harm is minimised through accessible support and reporting pathways, education and appropriate risk management.
- 4.6 MC is committed to the principle of reasonable adjustment to remove barriers therein providing an accessible and inclusive environment for vulnerable adults.
- 4.7 MC is committed to ensuring any Morling Community member who encounters vulnerable people as part of their Morling-related work activities has appropriate compliance clearances.

### 5. PRINCIPLES

- 5.1 MC will comply with the *Child Protection (Working with Children) Act 2012* (NSW), *Children and Young Persons (Care and Protection) Act 1998* (NSW), *Children's Guardian Act 2019* (NSW), *Child Protection Act 1999* (Qld), *Human Rights Act 2019* (Qld), *Children and Community Services Act 2004* (WA), *Working with Children (Criminal Record Checking) Act 2004* (WA) and any other relevant legislation and regulation relating to vulnerable people.
- 5.2 MC will take all reasonable measures towards the care and protection of vulnerable people who are on MC premises or engaged in MC activities.

- 5.3 MC will take reasonable steps towards ensuring vulnerable people are informed of rights and opportunities relevant to them.
- 5.4 MC will offer opportunities for vulnerable people to be involved in the review and enhancement of MC services which affect them.
- 5.5 MC will work to address power imbalances and any other form of inequity that may increase the likelihood of undue adverse impact on vulnerable people.
- 5.6 MC will ensure that Morling Community members are resourced and trained with appropriate knowledge, skills and awareness regarding the safety and wellbeing of vulnerable people.
- 5.7 MC will include risks to vulnerable people in its risk management assessments and plans and ensure regular cyclical review if these risks.
- 5.8 MC will maintain processes for reporting and handling complaints related to mistreatment of vulnerable people via MC grievance policies and procedures.
- 5.9 MC will maintain processes for reporting and handling disclosures and/or suspicions of abuse relating to vulnerable people. Refer to the *Vulnerable People Procedures*.
- 5.10 MC will ensure appropriate and timely reporting vulnerable person concerns and complaints to the relevant government departments and police as necessary in accordance regulatory requirements.
- 5.11 MC will ensure it appropriately recruits, screens and inducts staff with respect to child safety standards and the protection of vulnerable people, requiring staff to agree to adherence to the *Staff Code*.
- 5.12 MC will maintain appropriate measures of screening for volunteers, including those in positions on the MC Board or subcommittees, including requiring them to adhere to the *Volunteer Code*.
- 5.13 MC will maintain appropriate measures of screening prospective students and require them to agree to adherence to the *Student Code*.
- 5.14 MC will maintain appropriate measures of screening prospective residents and require them to agree to behavioural expectations referred to in the contract signed by the residents.
- 5.15 MC will ensure that MC research activities that involve vulnerable people comply with the requirements of the *National Statement on Ethical Conduct in Human Research* and the *Australian Code for the Responsible Conduct of Research* including gaining appropriate ethical approvals. See the *Responsible Conduct of Research Policy*.
- 5.16 MC will be informed by best practices regarding the treatment of and engagement with vulnerable people in its teaching and learning, including in online environments.

- 5.17 MC will uphold a process and record to ensure staff and volunteers who interact with vulnerable people, more than incidentally, as part of their MC work-related activities maintain currency in all relevant mandatory compliance checks.
- 5.18 MC will maintain a process and record to ensure students who interact with vulnerable people while undertaking Work Integrated Learning (WIL) activities hold all relevant mandatory compliance checks prior to attending those activities.
- 5.19 For any third party using MC facilities that provides services to vulnerable people, MC will have them state in writing their compliance with child safe and vulnerable person regulatory requirements, renewed annually.

#### **APPROPRIATE CHECKS AND CLEARANCES**

- 5.20 Morling Community members who are likely to encounter vulnerable adults more than incidentally as part of MC work-related activities or requirements will maintain any legislated compliance requirements related to working with those vulnerable adults.
- 5.21 Morling Community members who are likely to encounter children more than incidentally as part of MC work-related activities or requirements will maintain a current WWCC or equivalent.
- 5.22 MC requires a police clearance for those roles including the C-Suite Officers, roles with oversight of those conducting child-related work or interaction with vulnerable adults, and those handling sensitive information possibly including information of vulnerable people.
- 5.23 Staff roles that require a WCCC, police clearance, or other relevant check or clearance will be clearly indicated at recruitment. Roles will be reviewed cyclically for the currency of their check and clearance requirements.
- 5.24 If any staff member or contractor refuses to fulfill their check and/or clearance requirement, their employment/contract will cease.
- 5.25 If any staff member or contractor who is required to have a WWCC receives a negative notice, MC will act in accordance with the *Staff Code* or *Contractor Code* as relevant.
- 5.26 MC students whose study includes work integrated learning (WIL) involving child-related work will obtain and maintain a WWCC or equivalent for the duration of their WIL.
- 5.27 MC students whose study include WIL involving vulnerable adults will obtain and maintain any required checks or clearances for the duration of their WIL.

#### **REPORTABLE CONDUCT**

- 5.28 MC will fulfill its obligations set out in the Reportable Conduct Schemes of each state in which it operates.

## **NSW**

- 5.29 MC understands that it falls under the NSW Reportable Conduct Scheme as a religious body.
- 5.30 MC will notify the *Office of the Children's Guardian* of any reportable allegation or conviction against any employee, volunteer or contractor who is required to hold a NSW WWCC for the purpose of engagement with MC. MC will notify of reportable conduct regardless of whether the allegation/conviction is work-related.

## **WA**

- 5.31 MC understands that it is covered under the WA Reportable Conduct Scheme.
- 5.32 MC will notify the *Ombudsman of Western Australia* of any reportable allegation or conviction against any current WA employee of MC, provided they are over 18, regardless of whether they are required to hold a WWCC. MC will notify of reportable conduct regardless of whether the allegation/conviction is work related, and regardless of whether to the allegation/conviction occurred before the Reportable Conduct Scheme was set in place.
- 5.33 MC will notify of *Ombudsman of Western Australia* of any reportable allegation or conviction against any contractor and volunteer of MC, provided they are over 18, and provided they are required to hold a WA WWCC. MC will notify of reportable conduct regardless of whether the allegation/conviction is work related, and regardless of whether to the allegation/conviction occurred before the Reportable Conduct Scheme was set in place.

## **Queensland**

- 5.34 MC will fulfill its obligation under a Queensland reportable conduct scheme, should such a scheme be made enforceable and in understanding that MC is covered under such a scheme.

## **MANDATORY REPORTING**

- 5.35 MC understands that there are Morling Community members who are mandatory reporters.
- 5.36 It is the responsibility of the individual to ensure they understand their obligations under mandatory reporting requirements, although MC will assist as needed.

## **RECORDS**

- 5.37 MC will keep secure and accurate records of any matters required by this policy.
- 5.38 All documents relating to any investigation or complaint made against a staff member, student or resident will be kept confidential.

- 5.39 Records of investigations into reportable offences, personnel employment, incident and investigation reports, and other relevant incident-related correspondence related to this policy will be securely stored with restricted access for at least 50 years.
- 5.40 Personal information collected or held will be treated in accordance with the *Privacy Policy*.

## **RESPONSIBILITIES**

- 5.41 All Morling Community members are to treat with respect and protect the interests of vulnerable people.
- 5.42 Where a Morling Community member brings a child in their care to an MC facility or activity, that child remains the responsibility of the carer.
- 5.43 Children residing in or visiting MRC, MV or other MC accommodation remain the responsibility of their carer.
- 5.44 Carers will take all reasonable steps to safeguard the health and safety of the children in their care while on an MC campus or at a MC related activity. They must also ensure children are appropriately supervised and do not disrupt other people or MC activities.
- 5.45 Third parties using MC facilities are responsible for the wellbeing, health, and safety of any vulnerable people at their activities or events, including fulfilling legislative requirements.
- 5.46 Morling Community members participating in activities of an external third party are further subject to the safeguarding of vulnerable people policies and requirements of that organisation. E.g. Church activities while on deputation.

### ***Board***

- 5.47 The Board will regularly audit the appropriateness of this policy and its application.

### ***Principal***

- 5.48 The Principal will ensure there is appropriate focus on child and vulnerable people awareness in Board and relevant subcommittee agendas.

### ***Vice-Principal (Students and Community)***

- 5.49 The Vice-Principal (Students and Community) (VP(SC)) will monitor the implementation of this policy.
- 5.50 The VP(SC) will manage processes related to the reasonable care and protection of students who are vulnerable people.
- 5.51 The VP(SC) will manage the processes for reporting and handling complaints and disclosures.

- 5.52 The VP(SC) will oversee resourcing and training regarding matters of vulnerable people to the Morling Community.
- 5.53 The VP(SC) will manage processes for the involvement of vulnerable people in the review and enhancement of services and awareness.
- 5.54 The VP(SC) will facilitate the pastoral care of persons affected by allegations of abuse relating to a vulnerable person.

#### ***Chief Administrative Officer***

- 5.55 The Chief Administrative Officer (CAoO) will ensure adherence to staff recruitment, selection and induction policies and procedures, particularly regarding the appropriate screening and training of staff, contractors and volunteers.
- 5.56 The CAoO will manage the processes and records regarding staff, contractors and volunteers requiring mandatory compliance checks.

#### ***Chief Operating Officer***

- 5.57 The Chief Operating Officer will include consideration of vulnerable people in the *Risk Management Framework*.

#### ***Student Services Department***

- 5.58 The Student Services department will conduct appropriate screening of potential new students.
- 5.59 The Director of Student Services will manage the processes regarding students requiring mandatory compliance checks for WIL in consultation with the relevant Faculty Dean.

#### ***Accommodation Staff***

- 5.60 MRC staff (Sydney) or the Campus Director (Perth) will oversee appropriate screening of potential new residents.

#### ***Staff***

- 5.61 Where their role specifies so, staff are required to maintain an active WWCC, police clearance, or other specified clearance check.
- 5.62 Staff are to report any concerns of child or other vulnerable person abuse to the VP(SC). This applies regardless of whether the allegation is trivial or minor, and regardless of whether the assertion is made with proof. See the *Vulnerable People Procedures*.

## **6. RELATED DOCUMENTS AND LEGISLATION**

### **INTERNAL**

- Aboriginal and Torres Strait Islander Inclusion Policy
- Discrimination, Bullying and Harassment Policy



- Contractor Code
- Critical Incident Policy
- Grievance Policy EDU CCSC MRC
- Recruitment and Selection Policy
- Responsible Conduct of Research Policy
- Risk Management Policy
- Risk Management Framework
- Sexual Assault and Sexual Harassment (SASH) Prevention and Response Policy
- Staff Code
- Staff Grievance Policy
- Student Code
- Students with Disabilities Policy
- Volunteer Code
- Vulnerable People Procedures
- Work Integrated Learning Policy
- Whistleblower Policy

## EXTERNAL

- *Child Protection Act 1999* (Qld)
- *Child Protection (Working with Children) Act 2012* (NSW)
- *Children and Young Persons (Care and Protection) Act 1998* (NSW)
- *Children and Community Services Act 2004* (WA)
- *Disability Discrimination Act 1992* (Cth)
- *Human Rights Act 2019* (Qld)
- *Working with Children (Criminal Record Checking) Act 2004* (WA)
- [Australian Code for the Responsible Conduct of Research](#)
- [National Statement on Ethical Conduct in Human Research](#)
- [Mandatory Reporter Guide \(NSW\)](#)
- [Mandatory Reporting \(WA\)](#)

## 7. REFERENCES

- Macquarie University: Children at Macquarie University Policy
- Baptist Churches of NSW & ACT [Safe Church Policy \(Nov.'23\)](#)
- SMBC: Child and Vulnerable Persons Policy
- University of Divinity: Safeguarding Policy
- University of the Sunshine Coast: Working with Vulnerable People (including Child Protection) – Governing Policy
- <https://childsafesafe.humanrights.gov.au/national-principles/about-national-principles>
- <https://ocg.nsw.gov.au/child-safe-scheme/why-we-have-child-safe-standards>
- <https://ocg.nsw.gov.au/organisations/reportable-conduct-scheme>
- [https://www.ombudsman.wa.gov.au/Reportable\\_Conduct/](https://www.ombudsman.wa.gov.au/Reportable_Conduct/)

## 8. VERSION HISTORY

Version	Approved by	Approval date	Effective date	Changes made
4.00	MC Board	18 November 2024	18 November 2024	Policy expanded to incorporate the Child Safe Organisations National Principles (and relevant state standards) and the reportable conduct scheme requirements.
3.00	MC Board	11 September 2023	11 September 2023	Updated policy name to Vulnerable People Policy. Broad update of policy content and scope beyond protection to include support, opportunity etc. Added WA legislation references. Added "Authorities".
2.01	Policy Coordinator	Feb 2023	Feb 2023	Header table updated to latest version, including addition of keywords. Responsible officer and contact updated.
2.00	MC Board	22 September 2020	22 September 2020	Name of policy changed from Child Safety Policy to Protection of the Vulnerable Policy; vulnerable adults added to 4; 5.1; 5.5. 4.5 Child safety policies changed to safe spaces policy.
1	MC Board	22 Sept 2019	24 Sept 2019	New

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