

This policy and related procedures are applicable to the CHL group of companies (CHL) in Australia, including: Community Housing Ltd, Community Housing (Vic) Ltd, Community Housing Investment (VIC) Ltd, Community Housing (Tas) Ltd, Community Housing (Qld) Ltd, Community Housing (WA) Ltd, Community Housing Investment (WA) Ltd, Community Housing (SA) Ltd, Horizon Housing Realty Ltd, Australian Affordable Housing Securities Ltd, Community Housing Investment (QLD) Ltd, Community Housing Investment (NSW) Ltd, Community Housing (NT) Ltd, Community Housing (Subi East) Ltd, Community Housing (Homes For Regions) Ltd, Building Communities Housing Ltd and any other entities within CHL which adopt this policy.

Purpose and scope

CHL is committed to providing a safe environment for all individuals who interact with, or are impacted by our services and operations, with particular focus on children and vulnerable persons who may be at increased risk of harm.

This policy establishes CHL's organisational approach to safeguarding, including the prevention, identification, reporting and management of abuse, neglect and exploitation. It outlines the standards of behaviour expected of all CHL representatives and the governance arrangements that support safeguarding across all jurisdictions in which CHL operates.

CHL is committed to maintaining a child safe organisation that prioritises the safety, wellbeing and rights of children in all environments connected with its services.

This policy applies to:

- all CHL employees, contractors, consultants, volunteers and students
- all tenants, clients and other individuals engaged in CHL programs and services
- all CHL operations where children or vulnerable persons may be present or at risk.

Definitions

For the purposes of this policy:

Tenant is used as a general term and includes Renter in Victoria, in line with Residential Tenancies Act 1997 (Vic) as amended.

Child: A person under the age of 18 years.

Safeguarding: refers to the measures undertaken by CHL to protect individuals from abuse, neglect or exploitation and to promote their safety and wellbeing.

Abuse, neglect and exploitation: includes any act or omission that results in harm, whether physical, emotional, sexual, psychological or financial, including coercion, discrimination, harassment, grooming, misuse of power or failure to meet basic care needs.

Vulnerable person: means an individual who may be at increased risk of harm due to age, disability, mental illness, illness, social disadvantage, dependency on services or exposure to violence.

Reasonable grounds to suspect: exists where a person has information, observation or disclosure that would lead a reasonable person to believe harm has occurred, is occurring or may occur, regardless of proof.

Survivor-centred approach: means responding to safeguarding matters in a way that prioritises the safety, rights, wishes and wellbeing of the person affected.

Trauma-informed and culturally safe practice: Approaches that recognise the impact of trauma and respect cultural identity, particularly for Aboriginal and Torres Strait Islander children, ensuring responses are sensitive and effective.

Policy statements

1. Safeguarding approach

1.1. CHL's safeguarding approach is underpinned by the following principles:

- All individuals have the right to live free from abuse, neglect and exploitation.

- Safeguarding is a fundamental organisational responsibility.
- CHL adopts a zero-tolerance approach to harm.
- Safeguarding decisions prioritise the safety, dignity, rights and wellbeing of individuals at risk.
- CHL promotes a culture in which concerns are taken seriously and raised without fear of reprisal.
- CHL acknowledges its legal and moral obligations to identify, report and respond to safeguarding concerns.
- Safeguarding practices are trauma-informed and culturally safe.

2. Commitment to Child Safety and Vulnerable Persons

- 2.1. CHL is committed to being a safe organisation for children and vulnerable persons.
- 2.2. Children and vulnerable persons are respected, protected from harm and supported to express their views and participate in matters affecting their safety and wellbeing.
- 2.3. Children and vulnerable persons may face elevated safeguarding risks due to factors such as age, power imbalance, dependency on services or communication barriers. CHL embeds safeguarding considerations into governance, recruitment, service design and operational activities.
- 2.4. Children are provided with age-appropriate information about their rights, how to raise concerns, and how to access support, including external services.
- 2.5. Safeguarding responses consider the impact of domestic and family violence, in alignment with CHL's *Domestic and Family Violence Policy*.

3. Safeguarding Risk Management

- 3.1. CHL adopts a risk-based approach to safeguarding.
- 3.2. Safeguarding risks are identified through enterprise risk management, operational risk assessments and incident trend analysis.
- 3.3. Particular attention is given to risks arising from housing environments, including:
 - home visits and property inspections
 - contractor access to properties
 - tenant-to-tenant conflict or violence
 - after-hours attendance
 - temporary or crisis accommodation settings
 - interactions involving children present in tenancies.
- 3.4. Opportunities for harm are minimised in both physical and digital environments, including online communication channels and systems used in service delivery.
- 3.5. Appropriate controls are implemented for identified risks and emerging risks are escalated through governance mechanisms.

4. Recruitment and Screening

- 4.1. CHL implements safe recruitment and screening practices to minimise safeguarding risks.
- 4.2. Recruitment and screening processes are proportionate to role-related risk. Screening may include, where required by law or assessed risk:
 - Working With Children Checks.
 - National Police Checks.
 - Verification of qualifications, registrations and experience.

- Referee checks addressing conduct, integrity and suitability to work with children and vulnerable persons.
- 4.3. Individuals will not be engaged in roles involving contact with children or vulnerable persons unless required screening is satisfactorily completed.
- 4.4. All representatives must acknowledge and comply with CHL's *Code of Conduct Policy* and safeguarding obligations.

5. Professional Conduct and Behavioural Standards

- 5.1. All CHL representatives must maintain professional boundaries.
- 5.2. Conduct inconsistent with safeguarding obligations includes:
- personal relationships with customers that are not appropriately declared, approved, and managed, or that compromise professional boundaries.
 - grooming or manipulative behaviour
 - misuse of authority or influence
 - discriminatory, degrading or intimidating conduct
 - unauthorised private communication with children
 - offering gifts, inducements or favours that create power imbalance.
- 5.3. Breaches may constitute serious misconduct and will be managed in accordance with CHL's disciplinary processes.

6. Incident Reporting and Response

- 6.1. All safeguarding concerns must be reported promptly.
- 6.2. CHL representatives must report any concern to their manager.
- 6.3. Confidential and anonymous reporting options are available.
- 6.4. Individuals who report safeguarding concerns in good faith will be supported and protected from reprisal.
- 6.5. If a person believes there is immediate risk of harm or the victim of a criminal offence, they must contact emergency services by dialing 000.
- 6.6. Safeguarding incidents are assessed and managed under CHL's *Critical Incident Policy*.
- 6.7. Responses are survivor-centred, trauma-informed, culturally safe, lawful, timely and proportionate.
- 6.8. Where allegations involve a CHL representative, appropriate interim measures may be implemented to manage risk while the matter is assessed or investigated.

7. Mandatory Reporting and External Obligations

- 7.1. CHL complies with all applicable legal, regulatory and funding obligations relevant to safeguarding.
- 7.2. CHL will, where required:
- Report suspected criminal offences to police.
 - Report concerns about abuse, neglect or exploitation of children to the relevant statutory child protection authority.
 - Comply with mandatory reporting obligations under child protection legislation in the jurisdiction in which the concern arises.
 - Meet any reportable conduct, child safe scheme, or oversight body notification requirements applicable to CHL operations.
 - Report abuse, neglect or exploitation of people with disability in accordance with applicable disability safeguarding and regulatory frameworks.
 - Meet all government, funding body and contractual reporting requirements.

- Report qualifying matters to the ACNC and Housing Regulator where required.
- Cooperate fully with law enforcement, regulators and statutory authorities.

8. Record Keeping and Confidentiality

- 8.1. Safeguarding records are stored securely and separately from personnel files.
- 8.2. Access is restricted to authorised personnel.
- 8.3. Confidentiality is maintained except where disclosure is required to prevent harm or comply with legal obligations.
- 8.4. Records management complies with privacy legislation and retention requirements.

9. Training and Awareness

- 9.1. Safeguarding training is provided appropriate to role and responsibility.
- 9.2. Training covers:
 - recognising signs of abuse
 - reporting obligations and procedures
 - maintaining professional boundaries
 - culturally safe practice
 - children's rights and age-appropriate communication.
- 9.3. Safeguarding competency is included in onboarding and ongoing development.

10. Monitoring and Review

- 10.1. Incident data, risk reporting and internal reviews inform oversight.
- 10.2. Governance review ensures ongoing effectiveness.
- 10.3. Feedback from tenants, communities and stakeholders informs continuous improvement of safeguarding practices.

Accountability

Chief Governance Officer – accountable for authorising submission to the Executive Team for final policy endorsement by the Chief Executive Officer.

Chief Operations Officer – responsible for reviewing and maintaining the policy, overseeing its effective implementation and providing advice.

All Employees – responsible for complying with the policy, actively supporting its implementation, and contributing to the achievement of its objectives. Failure to adhere to this policy may result in disciplinary action, up to and including termination of employment.

Related documents

- [Code of Conduct Policy](#)
- [Critical Incident Policy](#)
- [Domestic and Family Violence Policy](#)
- [Feedback, Complaints and Appeals Policy](#)
- [Privacy Policy](#)
- [Records Management Policy](#)
- [Risk Management Policy](#)

Legislation

- Aboriginal and Torres Strait Islander Child Placement Principle (ATSCIP)
- Australian Charities and Not-for-profits Commission Act 2012 (ACNC Act)
- Child Protection Laws applicable in all Australian states and territories
- Child Safe Standards and Guidelines
- Crimes Act 1914
- Criminal Code Act 1995
- National Disability Insurance Scheme Act 2013 (NDIS Act)
- National Framework for Protecting Children and Young People
- National Redress Scheme for Institutional Child Sexual Abuse Act 2018 (Redress Act)
- Privacy Act 1988
- Work Health and Safety Act 2011

Additional resources

- Australian Human Rights Commission – Children’s Rights
- National Disability Insurance Scheme (NDIS) Quality and Safeguarding Framework
- Safe Work Australia

Approved by

Approved by Danny Dracic, Chief Executive Officer on 26/03/2026.