

## 1. Purpose

Lighthouse Disability recognises the right of all clients to feel safe and to live in an environment that provides protection from violence, abuse, neglect, exploitation, discrimination or any other form of harm. We also recognise that people with disability are at a greater risk of harm than people without disability.

The purpose of this policy is to prevent and respond to any practice or conduct that breaches the legal and human rights of our clients. It also ensures that any allegations or suspicions of harm are appropriately identified, reported and investigated.

## 2. Scope

This policy applies to any person employed or engaged by Lighthouse Disability, including paid staff, volunteers and contractors.

For the purposes of this policy, reference to ‘harm’ and ‘risk of harm’ relates to any form of violence, abuse, neglect, exploitation and discrimination.

## 3. Responsibilities

Role	Responsibility
CEO	<ul style="list-style-type: none"><li>Promote a culture that respects and upholds the rights of all clients to live free from harm.</li><li>Establish, maintain and periodically review this policy.</li></ul>
General Manager, Client Services	<ul style="list-style-type: none"><li>Ensure documented procedures are in place to support the implementation of this policy.</li><li>Monitor implementation and review performance of this policy to ensure that risks are identified and managed.</li></ul>
People & Culture Team	<ul style="list-style-type: none"><li>Implement robust screening processes, supervision, support and ongoing education and training.</li></ul>
Operations Manager	<ul style="list-style-type: none"><li>Ensure the principles and requirements of this policy are applied, achieved and sustained.</li><li>Inform and support operational decision-making in accordance with this policy.</li></ul>
Manager, Service Delivery (MSD)	<ul style="list-style-type: none"><li>Ensure this policy is communicated to and understood by Service Leads and CSWs.</li></ul>



Role	Responsibility
	<ul style="list-style-type: none"><li>• Provide appropriate guidance to staff to support the application of this policy.</li></ul>
Service Lead	<ul style="list-style-type: none"><li>• Ensure this policy is communicated to and understood by clients and supporters of their choice.</li><li>• Foster an environment where the rights of clients are embedded in daily practice.</li></ul>
Community Support Worker (CSW)	<ul style="list-style-type: none"><li>• Operate in accordance with this policy.</li><li>• Adhere to the NDIS and LD Codes of Conduct at all times.</li></ul>

## 4. Policy Statement

- 4.1 Lighthouse Disability acknowledges the rights of clients to be safe from harm, and is committed to upholding these rights by creating and maintaining an environment which ensures that clients are free from violence, abuse, neglect, exploitation and discrimination.
- 4.2 We work sensitively and respectfully with clients through a strengths-based, trauma-informed and culturally sensitive approach, acknowledging demographic factors that may influence a client's experience of safety.
- 4.3 We implement a proactive approach to help protect the client's rights to decision making, choice and control, safety, wellbeing, and quality of life while considering their individual risk factors and self-determined preferences.
- 4.4 Information is provided during the intake and support planning process in order to actively raise awareness of the client's legal and human rights, which they are empowered to exercise at every possible opportunity.
- 4.5 We recognise families, guardians, friends and advocates are important protective factors that can help to safeguard clients from harm. With the client's consent, we work collaboratively with their support networks to develop preventive safeguards against harm.
- 4.6 Preventative measures are in place at an organisational level to ensure clients can access supports that provide maximum protection from, and prevention of, harm. We shall develop and maintain robust procedures for the identification, reporting, investigation and management of incidents or allegations of harm.
- 4.7 Safeguarding requirements are integrated throughout the employment cycle by way of regular training, professional development and performance management. Screening processes are consistently applied to ensure all possible steps are taken to only employ or engage individuals who are suitable to have contact with people with disability.



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- 4.8 All employees, volunteers and contractors are required to comply with the NDIS and Lighthouse Disability Codes of Conduct which set out acceptable standards of behaviour.
  - 4.9 Employees are supported to understand their safeguarding responsibilities, including undertaking training to recognise indicators of, and respond appropriately to, disclosures of harm.
  - 4.10 It is the responsibility of all employees to report any suspicion or knowledge of actual, potential or alleged harm of a client in line with the Incident Management Policy. Failure to do so constitutes a serious breach of duty of care, and is subject to disciplinary action.
  - 4.11 Any incident or allegation of violence, abuse, neglect or exploitation that occurs in connection with the provision of supports and services by Lighthouse Disability also constitutes a Reportable Incident and shall be reported to the NDIS Quality and Safeguards Commission within 24 hours of key personnel becoming aware of the incident or allegation.
  - 4.12 The Incident Management System is in place to identify and report when harm has, or may have, occurred to a client. We shall ensure timely and appropriate responses to, and investigations of, incidents and allegations of harm that involve the client in the management and resolution.
  - 4.13 Where allegations of harm have been made, the client's access to, and use of, an independent advocate shall be supported and facilitated. We shall take all steps to ensure the immediate and ongoing safety of the client, providing appropriate support or referrals as required.
  - 4.14 Rigorous reporting and complaints mechanisms are implemented to ensure accountability and address any misconduct that occurs. Concerns are taken seriously and acted upon through confidential reporting mechanisms which protect the reporter's safety, which is supported by the Whistleblower Policy.
  - 4.15 We shall maintain compliance with relevant State, Federal and NDIS legislation, policies and processes, including the timely notification of Reportable Incidents to the NDIS Quality and Safeguards Commission and the reporting of criminal offences to the South Australia Police.
  - 4.16 Through a process of continuous improvement, we shall regularly review and update risk assessment and safeguarding policies and procedures to ensure ongoing alignment to influential factors that may include findings from the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability.



## 5. Related Documents

### 5.1 Policies, Procedures and Supporting Documents

- Incident Management Policy
- Client Rights Policy
- Whistleblower Policy
- Reportable Incidents Reporting Procedure
- Lighthouse Disability Code of Conduct
- Violence, Abuse, Neglect and Exploitation Procedure

### 5.2 Standards and Conventions

- United Nations on the Convention of Rights of Persons with Disability 2008

### 5.3 Legislation

- National Disability Insurance Scheme (Quality Indicators) Guidelines 2018
- NDIS (Incident Management and Reportable Incidents) Rules 2018
- NDIS (Practice Standards – Worker Screening) Rules 2018

## 6. Definitions

Key Word / Abbreviation	Definition
<b>Abuse</b>	Any behaviour that involves the ill-treatment of a person with disability. Abuse overlaps with violence, exploitation and neglect – for example, verbal abuse may be a form of violence, and financial abuse may be a form of exploitation.
<b>Neglect</b>	The failure to provide for the physical, emotional, social and cultural wellbeing and development of a person with disability.
<b>Exploitation</b>	Taking or attempting to take improper advantage of a person with disability for benefit, advantage or gratification.
<b>Safeguards</b>	Actions designed to protect the rights of people to be safe from the risk of harm, abuse, neglect or exploitation, while maximising the choice and control they have over their life.
<b>Abuse</b>	Any behaviour that involves the ill-treatment of a person with disability. Abuse overlaps with violence, exploitation and neglect – for example, verbal abuse may be a form of violence, and financial abuse may be a form of exploitation.



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## 7. Document Control

<b>Version Number:</b>	2	<b>Effective Date:</b>	13 <sup>th</sup> November 2023
<b>Process Owner:</b>	Client Services	<b>Approver:</b>	CEO
<b>Review Frequency:</b>	Every two years	<b>Review Date:</b>	13 <sup>th</sup> November 2025