

Client Safeguarding - Indigo

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1. Purpose

The purpose of this policy is to ensure that Indigo Australasia Incorporated (Indigo) has appropriate processes in place to ensure the safety and wellbeing of our clients when receiving care and services.

2. Scope

This policy applies to all staff.

3. Policy Statement

Indigo is committed to upholding the Statement of Rights for aged care clients and ensuring disability clients' legal and human rights are upheld when delivering care and services.

Indigo will take all steps possible to prevent and respond to incidents that occur in connection with our service provision, and any reports of abuse, neglect, racism, exploitation, violence, and discrimination, particularly toward people with a disability and older people.

Indigo is committed to creating a culture where clients and staff feel empowered to speak up and report abuse, regardless of whether the subject of an allegation is an Indigo staff member or someone else. Indigo has processes and reporting mechanisms in place to:

- respond and record to allegations of abuse that are in connection to the care and services we provide;
- report to external regulatory bodies, police and others as required;
- provide support to the client and anyone else affected to ensure their safety and wellbeing; and
- provide information and advocacy to clients to encourage them to report abuse that may be occurring that is not in connection with the delivery of Indigo care and services.

4. Principles

Indigo uses the following principles and processes to safeguard clients.

4.1. Consent

Indigo is committed to partnering with clients to uphold their rights and choices. Consent is required from the client, or their active appointed decision maker, to ensure their individual needs are respected during service provision. Indigo will confirm with the client, which parties the client wishes to be involved in their care, and these wishes will be respected. Consent is obtained from clients, to refer them to external providers, such as advocacy services, to assist them in the case of an incident, such as abuse or neglect, and to share any details of the alleged abuse with family members, supporters or others involved in their care.

4.2. Supported Decision Making

Indigo empowers clients to make their own choices regarding care and services, with support from family members, carers, advocates, or other trusted individuals when needed. Indigo

recognises the client's right to self-determination and autonomy, ensuring that their wishes, preferences, and best interests are upheld, even if they require assistance to understand options or communicate decisions.

4.3. Protecting Clients from Harm

Indigo has a duty of care to its clients and will ensure processes are in place to support their ongoing safety. Indigo will support self-determination in decision making processes and will respect informed decision making as well as dignity of risk.

Restrictive practices are only used in accordance with a clients' Behaviour Support Plan or Care Plan, and only when informed consent has been freely collected and documented.

Where it is identified that a client is at risk of harm or there is a suspicion of any form of abuse (including physical, financial, sexual, social, psychological, emotional and neglect), Indigo will consider its duty of care to ensure the safety of the client is maintained. This may include contacting emergency services and/or representatives involved in their care, if required.

When assessing risk of harm, staff should also consider the principle of dignity of risk. That is, that it is not our right to control a person's actions or decisions, but rather to help by providing support and information so they can make 'informed choices about their care and services and live the life they choose.'

All staff working in aged care complete mandatory training in identifying, responding and reporting *Elder Abuse*. Staff that interact with children are trained in practices for the safeguarding of children.

4.4. Code of Conduct

All staff must adhere to the *Indigo Employee and Volunteer Code of Conduct* which gives direction to expected behaviours, such as ensuring the safety and wellbeing of clients receiving support and services. Staff must also display the behaviours, where applicable, in *The Australian Health Practitioner Regulation Agency (AHPRA) Code of Conduct*; *NDIS Code of Conduct*; and *Code of Conduct for Aged Care*, which include specific statements relating to safeguarding of clients from abuse, neglect, violence, exploitation or any other form of harm.

4.5. Worker Screening

Indigo's worker screening processes are designed to ensure all staff, including those delivering services as an associate provider are appropriately screened and assessed as eligible to work as an aged care or NDIS worker before employment commences. Once employed, staff receive ongoing supervision and feedback and clearly understand their obligations as they align to standard and legislative requirements. These governance processes are outlined in the organisation's *Worker Screening Policy* and *Worker Screening Compliance Procedure*.

4.6. Response, Reporting and Investigation Requirements

Indigo monitors, reports, and investigates all client incidents which occur in connection to Indigo services and engages in continuous quality improvement activities to minimise the chance of incidents recurring. All incident reports and records will be handled confidentially and shared only with appropriate staff members and regulatory bodies as required by law, to protect the individuals involved.

When a concern is identified, regardless of whether the subject of allegation is an Indigo staff member, client safety and security will be prioritised. This may involve urgent medical assistance, counselling, or obtaining support from family, advocates and other representatives. At any time that staff believe a client is in immediate danger or criminal activity is a factor, the Police will be notified.

Indigo staff will follow incident management procedures, including maintaining appropriate records and conducting investigations in the alleged abuse, neglect, exploitation, violence and discrimination. Indigo has mandatory obligations to report certain incidents, including incidents of abuse, neglect, violence or other harm, to the NDIS Quality and Safeguards Commission and to the Aged Care Quality and Safety Commission. The *NDIS Reportable Incidents Procedure* and the *Serious Incident Response Scheme (SIRS) Procedure* have been developed to assist and support the organisation in meeting its responsibilities to report allegations of abuse, neglect or other harm.

4.7. Risk Assessment

Indigo will assess risks relating to clients when a situation of actual or alleged abuse has been identified. As a provider of services to older Australians and those with a disability, Indigo recognises that these clients may have unique needs and require particular consideration to ensure safe, respectful and culturally inclusive care. Staff, in consultation with their Team Leader and/or Manager will assess risks and determine if an emergency response is needed – this may include calling emergency services, such as the police or encouraging the client to contact others such as the Aged Care Quality and Safeguards Commission; NDIS Quality and Safeguards Commission; Advocare; OPAN; National Elder Abuse Phone Line or the National Disability Abuse and Neglects Hotline.

5. Definitions

Term	Definition
Abuse	Abuse is any form of violence, coercion, exploitation, discrimination, harm and/or neglect which causes another person psychological or physical pain or suffering. Abuse can be emotional, physical, financial, chemical or sexual.
Dignity of Risk	The term 'dignity of risk' promotes each client's autonomy and self-determination to make their own choices, including the choice to take some risks in life.
Discrimination	Discrimination is the unjust or prejudicial treatment of different categories of people, especially on the grounds of ethnicity, age, sex, or disability.
Elder Abuse	A single, or repeated act, or lack of appropriate action, occurring within any relationship where there is an expectation of trust which causes harm or distress to an older person.
Exploitation	Exploitation is taking advantage of someone's vulnerabilities for your personal gain, to steal, use or profit. Exploitation often occurs with vulnerable groups such as people with a disability and older people. Exploitation is a form of abuse.

Safeguarding	Safeguarding means protecting the welfare and human rights of people that interact with, or are affected by Indigo, particularly those that might be at risk of abuse, neglect or exploitation. This refers to any responsibility or measure undertaken to protect a person from harm.
Staff	Includes Board members, employees, contractors and volunteers.

6. Governance

Associated Framework	IDG-BRD-POL-078 Risk Management Framework - Indigo
Associated procedures / documents	IND-BRD-POL-0117 Client Feedback and Complaint Management IDG-BRD-POL-074 Employee and Volunteer Code of Conduct IDG-BRD-POL-071 Worker Screening Policy - Indigo IDG-QR-PRO-025 Serious Incident Response Scheme (SIRS) Procedure IDG-QR-PRO-044 NDIS Reportable Incident Procedure IDG-QR-PRO-032 - Incident Management Procedure – Indigo IDG-PC-PRO-071 – Worker Screening Compliance Procedure – Indigo IDG-CE-PRO-0132 Clinical Supervision Procedure - Indigo
Related legislation	Children and Community Services Act 2004 National Disability Insurance Scheme Act 2013 Aged Care Act 2024 Aged Care Rules 2025 Carers Recognition Act 2004 Working with Children (Criminal Record Checking) Regulations 2005 Privacy Act 1988 Work Health and Safety Act 2020 (WA)
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Owner	Board
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