

Policies, Procedures, Guidelines

Section 8



Alcohol
and Drug
Foundation



Australian Government

Local Drug Action Team Program

SECTION 8

Policies, Procedures, Guidelines



LINKED
POLICY

This section provides policies and procedures to support LDATs to design, deliver and evaluate high-quality and effective parenting programs.

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01 Definition of a parent used within this program

The Alcohol and Drug Foundation recognises that a 'parent' is an adult who is performing the role of a primary caregiver to a child. This may be someone other than the child's biological parent, and may include grandparents, step-parents, foster parents or other carers. The term 'parent' is used throughout this program to include all parents, carers and guardians of children.

02 Responding to Enquiries

The parenting program should be advertised in the setting or location in which the program will run and reach the group or population within which the program will operate. The participants should be sought and drawn from that specific group or population.

Responding to program enquiries should provide people enquiring with a clear overview of the program. Enquiries from potential participants should be handled as soon as possible and all people should be treated with courtesy, patience and respect.

The contact details of all people enquiring about the program should be recorded on a database to allow for follow up.

People seeking information should be given a verbal description of the program, including its objectives, the time and duration commitments and the delivery methods.

Program staff should provide the following in person, by mail or email:

- a) a program brochure
- b) the times and dates of relevant sessions.

03 Privacy and Confidentiality

The program is committed to protecting the privacy of any personal information it holds about individuals in accordance with Australian Privacy Principles. The Privacy and Confidentiality policy and procedure provides a framework within which it ensures confidentiality, privacy and secure record keeping.

Privacy

Re the Collection of Information, the program will:

- a) collect only information that is necessary for the performance and primary function of operating a parenting program
- b) take all reasonable steps to ensure the information we collect is accurate, complete, up-to-date and relevant to the functions we perform
- c) tell program participants why we collect the information and how it is administered
- d) store personal information securely and protect it from unauthorised access, misuse and loss
- e) inform program participants that they have access to information about them and the right to correct it.

Personal Information about an individual is collected only for: (i) program registration and (ii) for program evaluation.

The programme will give program participants the option of not identifying themselves when completing evaluation forms or opinion surveys.

Disclosures:

- a) The program will (i) use or disclose information only for the primary purpose for which it is collected, or a directly related secondary purpose and (ii) obtain consent from the affected person for other uses.
- b) The program will release personal information about a person only with that person's express permission and will release information to third parties if it is requested by the person concerned.

Confidentiality

The program will keep confidential information that is collected during the program registration process.

All discussions between program participants and program staff are private and remains in confidence, other than where the program participant discloses information about potential or actual self-harm or harm to others, or discloses information about an intended or actual illegal act.

The program will:

- a) inform all program participants about the confidentiality policy
- b) inform all program participants about the limits of confidentiality; specifically they are a disclosure about potential or actual self-harm or harm to others; a disclosure that a young person is suffering physical, sexual or emotional abuse by another person or a disclosure about intended or actual illegal acts
- c) require program staff to make sure that they remind any program participant about the limits of confidentiality if they have reason to believe the participant is about to disclose information that exceeds those limits.

04 How to Refer to Support Services

The LDAT must have a clear policy and process to guide program participants and program staff when they need to call on or refer a person to external support services.

Situations can arise which call for understanding or expertise that is beyond the program staff's responsibility or capacity. These include a program participant falling ill or behaving in a disturbed manner.

Some situations require mandatory reporting, including suspicion or knowledge of child abuse or neglect. Cases of mandatory reporting are the responsibility of the Program Coordinator.

Program staff must be trained to notice signs of distress, harm or trauma, to understand confidentiality and the need to address the concern as quickly as possible.

When appropriate the Program Coordinator should ensure the program participants know of local support agencies on which they can draw.

Program Coordinators must have access to crisis and emergency services including:

- Ambulance (000)
- Police (000)
- Lifeline (13 11 14)
- Kids Helpline (1800 55 1800)
- Suicide Call Back Service (1300 659 467)

References: Foundations of Successful Youth Mentoring: A Guidebook for Program Development, 43.

The Lookout <https://www.thelookout.org.au/other-professionals/responding-family-violence/referring-clients-other-services>
MENTOR. Peer Mentoring Supplement USA. 2020

References: Foundations of Successful Youth Mentoring: A Guidebook for Program Development, 43.

The Lookout <https://www.thelookout.org.au/other-professionals/responding-family-violence/referring-clients-other-services>

05 OHS Including Risk Assessment

The program has a legal and moral duty to protect all participants from harm. All participants are required to regard working safely and preventing accidents and injury as an individual and collective responsibility.

The program will ensure that all participants understand the program OHS policy.

The Program Coordinator is responsible for ensuring risk assessments are conducted and acted upon accordingly to minimise any risks to program participants or staff.

The Program Coordinator must:

- a) take care for their own health and safety and for the health and safety of others who may be affected by their acts or omission
- b) not engage in any conduct, activity or behaviour which could unreasonably endanger their own or any other persons' health
- c) identify potential hazards, assess risks and implement measures to reduce and control any risks
- d) gain consent from the program participants to the location of program meetings and activities that may involve risk of injury or harm
- e) ensure they are not affected by alcohol or any other drug while engaged in a program activity
- f) seek immediate care and attention for any injury sustained in a program activity and alert the program coordinator as soon as possible.

Reference: YACVIC Occupational Health and Safety <http://youthmentoringhub.org.au/policies-procedures/young-people-mentors-staff/>

06 Complaint/Grievance Resolution Procedure

A grievance resolution procedure ensures program participants and program staff have a transparent process for addressing any problem or complaint that they encounter. All participants must understand the grievance procedure, know how to make a complaint, and understand the process that will be followed. It is vital that a complaint is taken seriously and acted upon fairly, as soon as possible, according to due process.

The Grievance Resolution Procedure policy is based on the following principles:

- All grievances will be handled in a fair and reasonable manner, seeking to ensure natural justice is achieved. All persons involved in a grievance deserve procedural fairness
- To the extent possible, the program will aim to preserve the wellbeing of all parties concerned and to achieve fair outcomes
- Any person who lodges a grievance will not be unlawfully discriminated against or mistreated for raising a grievance. Any alleged discrimination, mistreatment or other inappropriate conduct may be investigated further, including in accordance with the additional disciplinary procedure below
- All parties to a grievance should participate constructively in the process and aim to seek a resolution which is as fair as possible to all parties.

The Grievance Resolution Procedure provides program participants and staff with a clear process that facilitates fair and equitable treatment of complaints and their resolution in a conciliatory and effective manner without undue delay.

1. The complainant should first discuss the matter directly with the person concerned to try to resolve the matter.
2. If the complaint cannot be resolved directly with the concerned person, the complainant should notify the Program Coordinator of the grievance and seek their assistance to facilitate a resolution:

Note: If the complaint is made against the Program Coordinator, the complainant (or the Program Coordinator) should contact the Local Drug Action Team who will be responsible for overseeing the grievance process.

- a) A grievance can be made verbally or in writing
- b) The person against whom the complaint is made will be provided with details of the complaint and the Program Coordinator will provide them with the opportunity to respond to the complaint before formal resolution is attempted
- c) If the matter remains unresolved the Program Coordinator will arrange mediation between the complainant and the person concerned.

3. Mediation: So far as it is reasonably practicable, at the mediation:
 - a. the parties will be informed of any information relevant to the complaint
 - b. each party will be invited to provide comments in relation to the complaint
 - c. the Program Coordinator will seek to facilitate a resolution of the grievance that is mutually acceptable to both parties
 - d. the Program Coordinator will provide all parties with clear responses and feedback and clarification of the next steps which can be taken, if any.
4. If the complaint remains unresolved, the issue will be referred to the Local Drug Action Team for resolution.
5. If the complaint remains unresolved, a Grievance Panel will be established by the Local Drug Action Team aimed at resolving the grievance within 10 working days. The Grievance Panel will provide written reasons for its decision to all involved parties and to the Program Coordinator.
6. If the complaint is not resolved by the Grievance Panel, the Program Coordinator may call upon an external mediator to seek a resolution.
7. So far as it is reasonably practicable:
 - a. The Program Coordinator will permit both the aggrieved party and the person against whom the complaint is raised to have a support person present at any discussions or meetings regarding the complaint
 - b. The Program Coordinator may call upon any person who has or may have knowledge about or witnessed the cause of the complaint to provide their knowledge or perspective
 - c. The Program Coordinator will seek to document the steps and proceedings undertaken to resolve the grievance
 - d. The Program Coordinator will endeavour to ensure that the complaint and all steps taken with a view to resolving the complaint are treated confidentially.
8. Possible Outcomes
 - a) The complaint may be resolved satisfactorily and the two parties able to resume or continue their engagement.
 - b) A satisfactory resolution might include one or more of (i) the protagonist making an apology, (ii) undertaking that the behaviour will not be repeated, (iii) receiving counselling or training.
 - c) If the complaint is substantiated and the Program Coordinator considers the behaviour was a sufficiently serious breach of ethics or responsibility, the person responsible may be required to leave the program.
9. Alleged Criminal Conduct
 - a) If the behaviour complained about might constitute a criminal offence, (e.g. sexual assault, rape, stalking, indecent exposure, molestation, obscene phone calls), the Program Coordinator might be required to report to police.
 - b) If the complainant is a young person, mandatory reporting to police and other external bodies may be required.
10. False Complaints/Victimisation
 - a) Disciplinary action may follow if a person makes a deliberately false and/or malicious complaint.
 - b) Disciplinary action may follow if a person mistreats, victimises or discriminates against another person because that person has made, or intends to make a complaint.

Reference: YACVIC <http://youthmentoringhub.org.au/policies-procedures/young-people-mentors-staff/>

07 Sexual Harassment

Sexual harassment is unwelcome conduct of a sexual nature, including an unwelcome sexual advance, unwelcome request for sexual favours or other sexually related conduct which results in a person feeling offended, humiliated and/or intimidated, where a reasonable person would anticipate that reaction in the circumstances.

Examples of sexually harassing behaviour include:

- unwelcome touching
- staring or leering
- suggestive comments or jokes
- sexually explicit pictures or posters
- unwanted invitations to go out on dates
- requests for sex
- intrusive questions about a person's private life or body
- unnecessary familiarity, such as deliberately brushing up against a person
- insults or taunts based on sex
- sexually explicit physical contact
- sexually explicit emails or SMS text messages.

All program participants must understand that sexual harassment is not permitted, that any instance of sexual harassment should be reported immediately, and that all complaints will be investigated according to due process. A breach of this policy will result in disciplinary action which may include the instigator being excluded from the program.

A person who believes they have been sexually harassed should follow the steps laid out in the Grievance Resolution Procedure.

Reference: Australian Human Rights Commission <https://humanrights.gov.au/our-work/sexual-harassment-workplace-legal-definition-sexual-harassment>

08 Legal Obligations and Liability

Legal liability arises when an organisation or individual fails to conform to the law or regulations or is negligent. The parenting program meets its legal obligations and liabilities via the suite of policies, procedures and guidelines which address key issues that include but are not limited to parental and guardian consent, codes of conduct, information and data management, privacy and confidentiality, sexual harassment, critical incidents, and insurance. This suite of policies, procedures and guidelines also attends to program risk and reputation by identifying potential risks to the program and mitigating risk and reputational issues.

09 Insurance (Including Volunteer)

Taking out insurance is not a substitute for good risk management processes. However, no suite of policies and practices can cover every contingency, so insurance is the necessary last resort.

The intention of this policy is to protect all program participants and any third parties involved in or affected by any program activity who might suffer harm or injury.

In considering insurance needs take care to provide adequate cover for all foreseeable contingencies while tailoring a package devoid of any cover not relevant to a parenting program.

The program should consider these policies:

- a) public liability (covering all third parties)
- b) personal accident (covering volunteer program staff)
- c) workers compensation (covering program staff)
- d) directors and officers liability (covering management committee members)
- e) property, equipment and building cover.

The program should consider these factors when deciding about appropriate insurance cover:

- a) the extent of cover
- b) the amount and extent of any excess
- c) any geographical limits
- d) any limits on the nature of activities
- e) relevant exclusions.

The program will ensure volunteers understand their responsibility to follow all stipulated program guidelines and abide by relevant State and Federal laws whilst involved in program activities.

It is recommended that organisations package insurance policies in order to generate the most cost-efficient cover and consider partnering with like-minded or similar organisations or programs to generate savings on insurance.

In the event of any incident or accident involving harm or injury to any program participants or third party involved in or affected by a program activity the incident will be reported. The following reporting guidelines will be observed:

- a) The incident report will be written as soon as possible.
- b) The incident report should:
 - i. deal only in facts
 - ii. offer no opinions or comments
 - iii. offer no discussion about liability or blame
 - iv. be made known to everyone involved in the incident and the reporting process.

The insurer should be notified as soon as possible about any actual or potential claim against the program or any program participant(s).

Reference: YACVIC <http://youthmentoringhub.org.au/policies-procedures/program-management/>

10 Media Policy

Strong, positive media coverage is important because it helps to build a team/organisation's public profile, promotes key messages, policies, programs and events, increases public awareness of alcohol and other drug-related issues, influences decision makers and impresses funders or potential funders.

Appointing a spokesperson

It can be useful to appoint a spokesperson to be the lead contact for any media-related enquiries. Having one or more spokespeople ensures that there are individuals selected who are conversant with all your key messages and prepared to address media if the need occurs. A spokesperson will need to communicate the positions and key messages of the organisation.

Reactive media

All media interview or information requests must be referred to the spokesperson in a timely manner. If a journalist attends an event or calls unexpectedly requesting information or an interview on the spot, staff/volunteers must inform the journalist that all media requests need to go through the organisation's spokesperson before they can make any comments or share information.

Proactive media

Your organisation can reach out to, and engage, local media to promote your work. The below guide provides lots of information on identifying local media, building relationships and writing media releases.

Guide: <https://community.adf.org.au/projects/engaging-media/>

Photograph requests

Program participants may not want to be named – always check with them before you identify them in the media and obtain a photo consent form if they agree to you using an identifiable photo of them.

Photo release forms should be filed in the same place as you keep the photographs.

All photograph requests for anyone under 18 years of age must be referred to the spokesperson and have parent/guardian permission. Photo release forms must be signed by the parent/guardian.

Media issues management

Thinking about potential negative issues that may occur ahead of time can ensure that if anything happens, your organisation can have an effective response to, and recovery from, an emergency or critical incident.

A crisis is defined as an event that has an impact on your organisation's internal and external stakeholders, operations or reputation.

A media crisis could look like:

- Negative media reporting around your organisation's activities
- Staff, volunteer or participant saying negative things about your organisation
- Stigmatising discussion of alcohol and other drug-related issues related to your organisation
- Material shared on social media which causes harm to staff, volunteer, participants or your organisation's reputation
- A specific incident related to program delivery such as injury, legal proceedings, accidents, loss of physical infrastructure.

If a media crisis occurs, do not respond publicly right away. All crisis management questions relating to the implementation of either the mentoring, peer support or parenting program modules or the Local Drug Action Team program should be referred to the Alcohol and Drug Foundation's Media Manager at media@adf.org.au or 0430 948 380.

11 Social Media Use

Social media can be a useful tool in connecting people and promoting your work. To ensure this is a safe and accommodating place for all, these guidelines should be followed.

Appointing a social media manager

It is helpful to choose an authorised person or small group of people to represent your team/organisation through your owned social media channels.

The social media manager/s will need to communicate the positions and key messages of the organisation.

While using social media on behalf of the organisation, staff/volunteers must adhere to the behaviour guidelines below.

Behaviour online

- Keep it civil: Be courteous and respectful at all times. Use respectful language and understand that others may have an opinion or belief that is different from yours.
- Protect your privacy: Don't post personal information that you would not be comfortable sharing with a stranger, or confidential information about the organisation or its work.
- Don't post any unnecessary information about yourself or anyone else, such as addresses, email addresses, or phone numbers. Program participants may not want to be named – always check with them before you identify them online and obtain a photo consent form if they agree to you using an identifiable photo of them.
- Never post images – or name – of under-age program participants without the written authorisation of a parent or guardian.
- Don't be offensive or 'troll': Ensure you do not post remarks that could be considered as racist, sexist, rude, defamatory, obscene, offensive, discriminatory or as attacking others.
- Keep it legal: Do not post anything that is illegal in any way.
- Protect copyright: Do not post material to the page that infringes the intellectual property rights of others.
- No spamming: Do not spam your own or others social media channels, or post or upload promotional material to other social media pages (not owned by the organisation) without permission.
- Be a positive representative: Don't share anything negative about colleagues/team members, program participants or your organisation on your personal social media.

Facebook, YouTube, LinkedIn and Twitter have rules too. Don't post anything which breaches community standards, found here:

Facebook: www.facebook.com/legal/terms

Instagram: help.instagram.com/581066165581870/

LinkedIn: www.linkedin.com/legal/l/service-terms

Twitter: twitter.com/en/tos

YouTube: www.youtube.com/t/terms

Photography

Do not share anyone's image on social media without their knowledge and consent.

When sharing images of anyone under 18 years of age on the organisation's social media sites, relevant photo release forms (permission forms) must be completed and retained for your records as long as the image is in use.

Leveraging social media

This guide from the ADF's Community Hub provides tips and resources on using social media to promote your work. <https://community.adf.org.au/projects/leveraging-social-media/>

12 Establishing A Budget

A minimal staffing level for a parenting program probably requires a program manager and a coordinator and a budget that provides for:

- a) rent and utilities
- b) training (trainers, venue catering)
- c) marketing and promotional materials
- d) postage, phone, internet
- e) stationery and office supplies
- f) insurance
- g) transport
- h) evaluation
- i) contingencies

Reference: Department of Planning and Community Development. A Guide to Supporting Effective Programs for Mentoring Young People. State of Victoria, 2007.