



# Precision Underwriting Pty Ltd

## Vulnerability Policy Statement

### Policy Statement

1. All people, regardless of their age, gender, race, religious beliefs, disability, sexual orientation, or family or social background, have equal rights to protection from abuse, neglect or exploitation.
2. Precision Underwriting commits to promoting and protecting the welfare and human rights of people that interact with, or are affected by, our work - particularly those that may be at risk of abuse, neglect or exploitation. We have no tolerance for abuse, neglect or exploitation. We will take a survivor-centric approach in all that we do.
3. All staff, partners and third parties of Precision Underwriting share responsibility for protecting everyone from abuse, neglect or exploitation. Beyond this, particular people have specific responsibilities, and they must carry out their duties without exception.
4. Precision Underwriting has a process for managing incidents that must be followed when one arises.

### Purpose

5. The purpose of this policy is to:
  - a. Help protect people that interact with, or are affected by, Precision Underwriting.
  - b. Define the key terms we use when talking about protecting people or Vulnerability.
  - c. Set out and develop the way Precision Underwriting manages Vulnerability risks.
  - d. Set out the specific roles and responsibilities of persons working in and with Precision Underwriting.
  - e. Facilitate the safe management of incidents.
  - f. To support a positive and effective internal culture towards Vulnerability.

### Definitions

6. 'Vulnerability' means protecting the welfare and human rights of people that interact with, or are affected by, Precision Underwriting, 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.
7. 'Abuse, neglect or exploitation' means all forms of physical and mental abuse, exploitation, coercion or ill-treatment. This might include, for example:

- a. Sexual harassment, bullying or abuse;
  - b. Sexual criminal offences and serious sexual criminal offences;
  - c. Threats of, or actual violence, verbal, emotional or social abuse;
  - d. Cultural or identity abuse, such as racial, sexual or gender-based discrimination or hate crime;
  - e. Coercion and exploitation;
  - f. Abuse of power.
8. 'Reasonable grounds to suspect' is a situation where a person has some information that leads them believe that abuse, neglect or exploitation has taken place, is taking place, or may take place. It comes with a low burden of proof (in fact, no proof is needed at all), but is based on some information. Questions that may help a person to determine whether they have 'reasonable grounds to suspect' might include:
- a. Could you explain to another person why you suspect something? This helps to make sure that your suspicion is based on information, even if you have no proof.
  - b. Would an objective other person, with the same information as you, come to the same conclusion? This helps to make sure that your suspicion is as objective as possible.
9. A 'survivor-centric approach' means considering and lawfully prioritising the needs, right and wishes of survivors.

## Roles and responsibilities

10. While the responsibility to protect people is shared by all who work at or with Precision Underwriting, some individuals have specific obligations with which they must comply.
11. The members of the board of Precision Underwriting are responsible for:
- a. Protecting all people that interact with, or are affected by, Precision Underwriting;
  - b. Ensuring that there are appropriate and effective ways for Precision Underwriting to do this;
  - c. Ensuring that Precision Underwriting observes all relevant laws relating to Vulnerability;
  - d. Ensuring that Precision Underwriting takes a survivor-centric approach.
12. The Chief Executive Officer of Precision Underwriting must:
- a. Ensure Precision Underwriting has effective and appropriate ways to manage Vulnerability and legal compliance;
  - b. (If necessary) Ensure the appointment of a Vulnerability Manager with appropriate skills and competency;
  - c. Ensure that, within the charity's approach, reasonable steps are taken to protect people;



- d. Ensure that reports to external parties are made where required.
13. The Vulnerability Manager of Precision Underwriting, is the Managing Director. This person should be suitably trained and experienced, but it need not be a full-time responsibility], must:
- a. Manage reports of abuse, neglect or exploitation;
  - b. Ensure that all staff, contractors, and volunteers are aware of relevant laws, policies and procedures, and Precision Underwriting Code of Conduct;
  - c. Ensure that all staff, contractors and volunteers are aware of their obligations to report suspected incidents of abuse, neglect or exploitation;
  - d. Manage reports of abuse, neglect or exploitation;
  - e. Provide support for staff, contractors and volunteers in undertaking their responsibilities.
14. All Managers of Precision Underwriting must:
- a. Promote a positive culture towards Vulnerability;
  - b. Implement this policy in their area of responsibility;
  - c. Ensure that the risks of incidents have been considered in their area of responsibility;
  - d. Ensure that there are appropriate controls in place to prevent, detect and respond to incidents;
  - e. Facilitate the reporting of any suspected abuse, neglect or exploitation;
  - f. Take a survivor-centric approach to potential incidents and ensure that any incident is dealt with transparently and accountably.
15. All Staff and Volunteers of Precision Underwriting must:
- a. Familiarise themselves with the relevant laws, the Code of Conduct, policies and procedures for Vulnerability;
  - b. Comply with all requirements;
  - c. Report any incident to the appropriate authority when it is reasonable to suspect that a person's safety or welfare is at risk
  - d. Report any suspicion that a person's safety or welfare may be at risk to the appropriate authority; and
  - e. Provide an environment that is supportive of everyone's emotional and physical safety.
16. All partners and contractors of Precision Underwriting must:
- a. Implement the provisions of this policy and Precision Underwriting's procedures in their dealings with Precision Underwriting:



- b. Report any suspicion that an incident may have taken place, is taking place, or could take place.

## Managing Vulnerability risk

17. The way Precision Underwriting manages the risks of Vulnerability will be:

- a. Holistic. Precision Underwriting and its stakeholders will work to prevent, detect and take action on incidents.
- b. Risk-based and proportionate. Precision Underwriting will regularly assess the risks to people in its operations and develop proportionate controls to mitigate those risks.
- c. Survivor-centric. Precision Underwriting will put survivors at the heart of its approach to Vulnerability.
- d. Lawful. Precision Underwriting will ensure that it understands and complies with the law in everything it does, in all jurisdictions in which it works.

18. Precision Underwriting will manage the risk of Vulnerability by:

- a. Having up-to-date and documented risk assessments;
- b. Maintaining a register of Precision Underwriting's legal obligations for Vulnerability and workplace health and safety in all the jurisdictions in which it operates;
- c. Having an action plan that sets out how it will manage Vulnerability;
- d. Adhering to this Vulnerability Policy and its Code of Conduct;
- e. Doing due diligence checks of staff, volunteers and third parties;
- f. Implementing policies, procedures and systems that introduce controls to reduce the likelihood and consequence of incidents;
- g. Conducting awareness-raising for stakeholders on risks, expectations, and individual responsibilities;
- h. Maintaining two reporting processes: the confidential reporting process, and the overt reporting process;
- i. Having an incident response plan;
- j. Monitoring and reviewing the effectiveness and proportionality of its Vulnerability approach.

## Managing incidents

19. Harassment, abuse, neglect and exploitation are all serious misconduct and Precision Underwriting reserves the right to:

- a. Take disciplinary action against those it believes are responsible, which may include dismissal;
- b. Take civil legal action;



- c. Report the matter to law enforcement.

#### *Reporting suspected incidents*

- 20. All staff, volunteers and third parties must, as soon as practicable, report any suspicion that an incident has taken place, may be taking place, or could take place.
- 21. They may do this through direct reporting to:
  - a. Any member of the board;
  - b. The Chief Executive Officer;
  - c. The Vulnerability Manager;
  - d. Their Manager or Supervisor.
- 22. If a person wants to report confidentially, including with anonymity, they may use the confidential reporting system, which is: **paul@precisionunderwriting.com.au**
- 23. If a person believes that another person is at risk of immediate harm or the victim of a criminal offence, they must dial 000.

#### *Responding to suspected incidents*

- 24. All suspected, perceived, potential or actual incidents will be managed through the incident response plan.

#### *External reporting*

- 25. Precision Underwriting will:
  - a. Report any suspicion of a criminal offence to the police or the relevant criminal judicial body;
  - b. Lloyds ;
  - c. Report.

### **Privacy and data protection**

- 26. All personal information considered or recorded will respect the privacy of the individuals involved unless there is a risk to someone's safety. Precision Underwriting will protect personal information.
- 27. Precision Underwriting's Privacy Policy applies.

### **Administration of this policy**

- 28. This Policy will be reviewed every year. The next review will be November 2023.