

CHILD SAFE (ORGANISATION) POLICY

National Quality Standard: QA 2 – Children’s Health and Safety, QA 5 - Relationships with Children, QA 7 – Governance and Leadership

Policy Owner: Safety and Compliance

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1.0 Introduction and Purpose:

We are committed to creating and maintaining a culture where the safety, rights, and wellbeing of children are paramount. The best interests of the child are our highest priority in all decisions, actions, and practices. We support and respect our team members, volunteers, families, and children to ensure every child is safe, happy, and empowered within our services.

We have zero tolerance for child abuse, neglect, or harm. All allegations, concerns, or suspicions relating to a child’s safety or wellbeing are taken seriously and responded to promptly, consistently, and in accordance with legislative and regulatory requirements. Our approach is underpinned by a shared responsibility to protect children and uphold their right to feel safe and be free from harm.

This policy is designed to empower children by recognising them as active participants in matters that affect them. We actively involve children in decision-making processes, particularly where decisions directly impact their experiences and wellbeing. Children’s views are listened to, valued, and respected, in recognition of their right to be heard and their entitlement to safe, supportive, and inclusive environments.

2.0 Who does this policy apply to:

Team Members, Families, Children, Board Members, Students, Volunteers and Contractors

3.0 What is our policy:

3.1 Training and Supervision

Child safety is a shared responsibility and is embedded across all aspects of our operations, practice, and organisational culture. We are committed to fostering an environment where all team members, families, and children feel confident and supported in raising concerns or allegations related to child abuse or child safety.

All team members (including casuals), students, and regular volunteers receive education to recognise, support, and minimise the risk of child abuse; identify potential indicators of abuse; and respond appropriately to disclosures, suspicions, or allegations.

We provide clear guidance on expected standards of behaviour, as outlined in our *Code of Conduct* and the *Child Harm Classification and Management Table*. Team members understand that their interactions with children must always uphold safety, respect, and professionalism.

Any inappropriate behaviour or breaches will be reported through the appropriate internal and external channels, in line with our mandatory reporting obligations. Supervision and regular professional development ensure our team maintains a strong understanding of child safety principles and remains confident in applying them in day-to-day practice. Children must be adequately supervised at all times, and team members must be in sight and/or sound of other team members. For more information review the *Adequate Supervision Policy*.

3.2 Governance



We ensure that our governance structures, leadership arrangements, and accountability frameworks at all levels prioritise the safety, rights, and wellbeing of children as a paramount consideration. The Child Safe Standards are embedded into strategic planning, organisational governance, operational systems, and everyday practice, with leaders and those in positions of responsibility held accountable for transparent decision-making, oversight, and continuous improvement in child safety outcomes.

Child safety is considered in every decision, at all times. From policy development and workforce recruitment to risk management, supervision, and incident response, the Child Safe Standards guide how we operate. This approach ensures that children's rights, safety, and best interests remain central across all aspects of governance, management, and service delivery, reinforcing our commitment to creating safe, inclusive, and protective environments for all children.

3.3 Recruitment

We have a thorough and extensive recruitment process to ensure that we choose the best and appropriate people to work in our centres in accordance with the *Recruitment and Selection Policy*.

All team members (including Support Office), students, volunteers and regular contractors are required to hold a valid Working with Children Check (WWCC) or equivalent and are required to provide evidence of this check on commencement and renewal. Team members WWCC are stored on Human Force so that currency can be tracked. Students, volunteers and contractors must provide their WWCC at the centre when in attendance. For Further information review the *Suitability to Work Policy*.

Reference checks and police record checks are carried out during the recruitment process, and we ask child protective related questions during interviews. All team members undertake a *Suitability to Work Declaration* prior to appointment and on an annual basis. Where we become aware that a potential applicant has restrictions or bar on their WWCC or have been issued a prohibition notice, the process will be stopped immediately, a Be Safe Incident Record completed and the Regulatory Authority will be notified within 24 hours.

Those persons identified as Persons with Management and Control will be identified and complete requirements in accordance with the Governance and Management Policy and Persons with Management and Control Procedure.

3.4 Fair Procedures for Team Members and Volunteers

The decisions we make when recruiting, assessing incidents, and undertaking disciplinary action will always be thorough, fair, transparent, and based on evidence.

We record all incidents, allegations of abuse and safety issues on our online safety reporting system, BeSafe. Our management of child harm allegations are documented on the *Child Harm Classification and Management Table*. This also outlines the immediate actions taken and outcomes to be delivered based on a substantiated allegation.

All records are securely stored and confidential. If an allegation of abuse or a safety concern is raised, where appropriate, we provide organisational updates to families and other relevant parties on progress and actions. These matters are managed in accordance with our *Privacy Statements* and *Records Retention and Management Policy*.

All personal information considered or recorded will respect the privacy of the individuals involved unless there is a risk to someone's safety.

Everyone is entitled to know how this information is recorded, what will be done with it and who will have access to it. This is intended to protect reporters and to ensure that all members are comfortable to disclose any allegations or concerns in relation to child safety without repercussions.

For further information refer to the *Privacy Policy*, *Records Retention and Management Policy* and *Whistle-blower Policy*.

3.5 Legislative Responsibilities

We take our legal responsibilities seriously, including:

- a. Failure to disclose: All adults who have a reasonable belief that an adult has committed a sexual offence against a child under 16 have an obligation to report that information to Police.

- b. **Mandatory reporting:** All team members are mandatory reporters, so where a team member has a reasonable suspicion that a child is subject to, or at risk of, physical or sexual abuse both inside and outside of the centre, these concerns must be reported to the relevant agencies which may include Child Protection, Police, Reportable Conduct Schemes.
- c. **Failure to protect:** People of authority at Guardian (including Teachers, Centre Managers, and Portfolio Managers) will be seen to have committed an offence if they know of a substantial risk of child sexual abuse and have the power or responsibility to reduce or remove the risk but negligently fail to do so.
- d. **Reportable conduct:** The head of our organisation (Chief Executive Officer) is made aware of any allegations of physical and sexual abuse, sexual misconduct, significant emotional or psychological harm or significant neglect by an employee or volunteer towards a child. We report these incidents in accordance with the state-based reporting requirements and meet all timeframes. Reportable Conduct Schemes are in place in ACT, New South Wales and Victoria.
- e. We ensure that child harm allegations that meet the threshold will be reported. This applies to any child harm allegations made against team members, students, volunteers, visitors and contractors whom we have control of and are working in an engagement capacity with us.
- f. **Duty of care:** We understand our duty of care obligations to all children and team members. We must ensure that we take all steps necessary to protect the children in our care.

For further information review the *Child Protection and Mandatory Reporting Policy*.

3.6 Risk Management

Protecting children is a shared responsibility and a core part of our commitment to child safety. In addition to managing general workplace health and safety risks, we proactively identify, assess and minimise risks of harm, abuse and neglect to children through policies, procedures, training, support tools and reporting processes.

Adequate supervision of children must always be prioritised. Team members are required to position themselves within sight and/or sound of one another to support, monitor and guide practice, and to enable timely intervention in child-related situations where required. For further information, refer to the *Adequate Supervision Policy*.

We ensure that students, volunteers and any person under 18 years of age are appropriately supervised at all times and are informed about our child safe practices and expectations. As part of daily operations, team members working towards a Certificate III qualification (trainees) must remain within sight and/or sound of a qualified Certificate III educator or above.

We also implement risk management strategies to identify, assess and minimise child safety risks arising from both physical and online environments. For further information regarding environmental risk management, refer to the *Safe Environments Policy*.

NSW Only: Each centre will maintain a *Child Protection (Safe) Risk Assessment* that identifies potential risks to children and outlines the strategies, controls and practices implemented to ensure that risk of child protection concerns are identified and managed. This assessment is regularly reviewed and updated as new risks are identified, incidents occur, environmental changes are made, or improvements are required.

NSW Only: Centres will ensure that when filing their educator logs at the end of the week/ month that a list of team members WWCC numbers who worked during that period is filed with the logs.

3.7 Complaints and Complaint Management Processes

All concerns, grievances, and complaints are taken seriously. When any person raises an issue, these will be managed in a sensitive, timely manner.

We listen and respond to children in the same manner and ensure that any issues raised by them are considered and

where possible actioned. We believe that even the youngest children can raise concerns verbally and non-verbally. A child crying, smiling or refusing are seen as the first forms of children expressing their displeasure or preferences. These cues or non-verbal communications are a child's first opportunity to express their needs and have their concerns responded to. Children's views and ideas will be listened to and considered and used to inform program decisions.

For further details please review the *Family, Visitors and Child Grievance and Complaints Policy* and the *Whistle-blower Policy*.

3.8 Technology and Online Environments

We recognise that technology and communicating and documenting online is an essential component of the way in which we work and more broadly across society. We also recognise that there are inherent risks associated with digital devices for our centres and that appropriate controls must be in place. The use and management of digital devices are detailed in the *Digital Device Policy*. CCTV usage and management is detailed in the *CCTV Policy*.

All documents containing personal information are collected and stored in accordance with the *Privacy Policy*. Where data breaches have become apparent, these will be reported and managed by our Privacy Officer within our legal department and all reporting notifications will be met. We will gain media permission from families as part of the enrolment form to ensure that families understand how and when photos, video or other online mediums involving children are stored and used. We respect a family's right to refuse the use of their photos or video. Where this media permission is not granted, processes to manage this risk will be documented in the centre risk assessment.

Where we use digital devices for photographs of children, we will ensure that these are not accessed by unauthorised person(s), and we maintain confidentiality and privacy requirements. Photos and videos must not be taken or stored on personal digital devices unless an exemption request has been approved. For further information review the *Digital Device Policy*.

The use of online environments as part of the educational program will be monitored and team members will ensure that the content is appropriate. We will share information about on-line and digital safety with children and families in an age-appropriate way and where appropriate. Online and digital safety will be detailed on centre Risk Assessments (where applicable).

3.9 Cultural Safety, Inclusion and Equality

We recognise that children come from different cultural backgrounds and bring with them different skills, abilities, strengths and languages. We will ensure that all children feel safe to share and celebrate their cultural background and that practices ensure that they feel included in an environment where equality is embedded.

We acknowledge our Aboriginal and Torres Strait Islander heritage and celebrate their cultural influence. We embed and reflect their culture, customs, and values within the program to support recognition and understanding.

In accordance with our *Code of Conduct* we do not tolerate any form of racism, discrimination or bullying and harassment.

4.0 Responsibilities:

4.1 Approved Provider will:

1. Develop systems and processes to meet Child Safe Standards and these are communicated to all team members
2. Ensure that the Head of Organisation (CEO) is appointed and notified of any relevant conduct that meets relevant state-based Reportable Conduct Schemes, prior to the reporting being undertaken



3. Ensure that all child harm incidents that meet the threshold for reporting to third party regulators are met including Child Protection, Reportable Conduct and Police
4. Ensure that child harm reporting information is included in the Board and Management packs and reported to the Executive Leadership Team. Relevant insights are provided where appropriate, and any recommendations or changes to improve current policies or practices will be included as part of this process
5. Ensure that policies and procedures embed Child Safe Standards and are reviewed regularly. These policies and procedures, as well as supporting tools and resources, will be available on the Guardian Way
6. Ensure all around centre support staff, team members in centres and support office team members deemed high risk (due to responsibilities or delegations) hold a current Working with Children Check or equivalent. And all persons with financial delegations also meet any police check requirements as outlined in and in accordance with applicable legislation. Where these checks identify offences related to work requirements these will be escalated to the Chief People and Culture Officer for review and action
7. Ensure training and development opportunities are made available to team members to enhance skills and knowledge. From time-to-time Guardian may specify specific training for team members. Where this is a requirement, this will be communicated to team members
8. Ensure incident management processes are developed and implemented to support effective and timely management. A review of incidents both internal and external is undertaken to ensure learnings are applied
9. Ensure incident management processes are implemented that include documenting hazards, near misses and incidents online (BeSafe). Processes and workflows document incident management processes and who is notified as part of incident management.
10. Put in place systems to ensure risks are identified and managed so that safe environments are provided
11. Ensure that Persons with Management and Control complete prescribed child safety training
12. That records and documents processes are in place so that privacy requirements are met

4.2 Centre Manager/Nominated Supervisors will:

1. Ensure that all team members rostered have a current Working with Children Check or equivalent. Where a team member has an expired check, they will not be rostered to work and only reinstated when their check has been processed
2. Ensure all volunteers, students, regular contractors and visitors, such as incursion organisations, allied health professionals and regulators have a current Working with Children Check or equivalent and sign the Visitors Log each time they attend a centre
3. Ensure that all team members undertake their induction and understand their responsibilities related to keeping children safe
4. Ensure all team members are knowledgeable with all child safety policies and procedures and understand how to implement these in their daily responsibilities
5. Ensure that where team members hold a reasonable suspicion that a child is at risk of harm that these concerns are reported to their state-based Child Protection authority and that the incidents are recorded on BeSafe and that the *Child Protection and Mandatory Reporting Policy* is followed
6. Ensure that where they become aware a team member is under investigation for a criminal or child-related offence that they escalate this information to their Portfolio Manager for advice immediately. This will be documented on the incident reporting system (e.g. BeSafe) and marked confidential immediately

7. Ensure that the *Educator Record* is reviewed and kept up to date. This will be used to ensure that team members hold a current Working with Children Check, meet any child protection and child safety training requirements and to verify their qualifications
8. Ensure risk assessments are developed and implemented for all identified risks and that there are control measures in place to ensure that team members understand these risks and implement control measures. This also includes the use of technology and online environments (where applicable)
9. Ensure that child harm incidents are reported on Be Safe and where required a fact-find is undertaken ensure that this is conducted fairly and that outcomes and actions are consistent with the *Child Harm Classification and Management Table*
10. Ensure that prescribed child safety and child protection training is completed and a certificate is kept on file and uploaded to Human Force
11. **NSW Only:** Ensure that a *Child Protection Risk Assessment* is maintained by the centre and understood and Implemented by all team members
12. **NSW Only:** Ensure that when filing Educator Logs at the end of the week/month that a list of team members WWCC numbers who worked during that period is filed with the logs.

We recommend that **Centre Managers / Nominated Supervisors:**

1. Arrange their roster and day-to-day staffing to ensure team members with a Working Towards Certificate 111 (trainee) are within sight and/or sound of a qualified Certificate 3 Team Member or above.

4.3 Support Office will:

1. Ensure that around centre support staff team members in centres and support office team members deemed high risk (due to responsibilities or delegations), that must hold a current WWCC or equivalent is uploaded to Human Force
2. Ensure documents which contain children's personal information or images will be managed in accordance with the Privacy Policy and stored in accordance with the *Records Retention and Management Policy*
3. Follow all requirements as set out in the *Digital Device Policy*
4. Complete all mandated child safety and child protection training requirements

4.4 Team members will:

1. Ensure they understand their reporting requirements including those related to child harm and safety and that these are implemented consistently
2. Undertake child protection training relevant to their state and provide the certificate of completion to their Centre Manager where this training has been undertaken by an external training provider and that this is uploaded to Human Force
3. Complete other mandatory safety training as directed (internal or external) and this is uploaded to Human Force
4. Complete the *opening, closing, sleep and rest and playground checklists* as well as other safety checklists, and any maintenance and safety issues are documented and escalated to the Responsible Person immediately
5. Ensure that where a child discloses an allegation of abuse or observe an account which may constitute abuse that this is discussed with their direct line manager / Responsible Person as soon as practicable, and the incident is documented on BeSafe immediately

6. Ensure that any risk assessments in place are understood and that all control measures are met. Where a new risk is identified this is raised with the Responsible Person on duty so that the risk can be managed or removed, if the item is easily and safely moved
7. Notify the Responsible Person or Centre Manager as soon as practical where you feel that supervision / safety may be compromised such as inadequate educators or challenges with children's behaviours
8. Ensure that educator logs are completed when working directly with children, (both signing in and signing out) and ensure that they alert other team members when entering or leaving the space. Team members will also sign in and out daily on Human Force
9. Ensure that all incidents are recorded on BeSafe, and the Centre Manager or Responsible Person is alerted to incidents that occur at the centre
10. Ensure that individual and specific requirements for children are implemented which could include persons who can pick up and collect the child
11. Ensure that family, team and child complaints are listened to and responded to appropriately. This should include that their concerns are noted and either resolved in consultation with them or escalated
12. Involve children in decision-making opportunities that affect them and that there is a process to listen to their feedback and implement any changes
13. Ensure that prescribed child safety and child protection training is completed and a copy of the certificate is provided to the Nominated Supervisor / Centre Manager
14. **NSW Only:** Ensure that the Child Safe Risk Assessment is understood and implemented at all times. If a new risk is identified raise this with the Responsible Person, Lead Educator or Centre Manager

We recommend that **Team Members:**

1. Ensure that team members with a Working Towards Certificate 111 (trainee) are within sight and/or sound of a qualified Certificate 3 Team Member or above. Where this is not the case, they will escalate to the Responsible Person on Duty

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4.5 Families and community members will:

1. Ensure that their current details and information about their child is provided to the centre as part of ongoing enrolment
2. Alert the centre where a court-related order is in place and provide a copy of the document so that requirements can be met
3. Notify the centre and provide details when a different person will be dropping off and/ or collecting their child
4. Follow all policies and procedures as it relates to personal digital devices and ensure if volunteering, or undertaking a student placement they hold an appropriate WWCC or equivalent
5. Report to the Responsible Person on Duty immediately if they have any concerns about the health, safety or wellbeing of a child

5.0 State Specific Requirements



New South Wales Working with Children Check: Working with Children Check must be verified upon issue and renewal. Evidence of this check must be kept in their personnel file. New South Wales has reporting requirements to the Office of Children’s Guardian in relation reportable conduct.

ACT: ACT has reporting obligations to the ACT Ombudsman for incidents in relation to reportable conduct.

Victoria: Child Safe Standards Victoria has legislated eleven Child Safe Standards. Victoria also has reporting responsibilities to the Social Services Regulator.

Working with Children Checks Working with Children Checks must be verified online upon being issued and on an ongoing basis and checked annually for full-time team members, six monthly for part-time team members on three or less days and quarterly for regular casuals. Agency and single use casuals must be checked before commencing their shift. The verification must be printed out, signed by the Nominated Supervisor or Responsible Person on duty and dated.

Queensland Blue Card: All centres have their own portal, and the Centre Manager is responsible for linking, unlinking all team members. A register must also be kept. Queensland has Reportable Conduct Requirements to the Queensland Family and Child Commission (QFCC).

6.0 Definitions

BeSafe the incident system to record all incidents, injuries, illnesses, complaints, centre incidents, allegations of harm and so on.

Working with Children Check Is an Australian background check requirement, assessing the criminal record of those working or volunteering in child-related work. Also known as the WWCC.

7.0 References

National	Australian Capital Territory	New South Wales
Education and Care Act (2010) Education and Care Regulations (2011) Australian Human Rights Commission Children's rights work Children's rights video Guidelines for the inclusion of transgender and gender diverse people in sport National Office for Child Safety National Principles for Child Safe Organisations advisory group member websites Royal Commission into Institutional Responses to Child Sexual Abuse Australian Institute of Family Studies	ACT Children and Young People Commissioner ACT Working with Vulnerable People Checks ACT Reportable Conduct Scheme	NSW Office of the Children’s Guardian NSW Office of the Advocate for Children and Young People NSW Reportable Conduct Scheme
Queensland	South Australia	Victoria
Queensland Family and Child Commission Office of the Public Guardian Queensland Working with Children Check	South Australia Office of the Guardian for Children and Young People South Australia Working with Children Check	Victoria Commission for Children and Young Persons Victoria Reportable Conduct Scheme Victoria Working with Children Check

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8.0 Tools and Resources

<p>The most important documents I need are: Child Safe Organisation Poster (All states except VIC) Child Safe Organisation Victoria Child Protection and Mandatory Reporting Policy Risk Assessment Template Digital Device Policy CCTV Policy Child Harm Management and Classification Table</p> <p>Knowledge Hub pages Child Safe Standards Child Protection Grievance and Complaints</p>	<p>Other supporting documents will include: Family, Visitor and Child Grievance and Complaints Policy Our Commitment to Child Safety Poster Zero Tolerance Poster Privacy Policy Code of Conduct Policy Governance and Leadership Policy Guardian Curriculum Records Retention and Management Policy Whistle-blower Policy Safe Environments Policy National Child Protection Requirements Table</p>
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9.0 Links to the National Law and Regulations

- 168 Education and care service must have policies and procedures.
- 84 Awareness of child protection law

Policy owner	Chief Quality and Curriculum Officer		Content author	National Safety and Compliance Manager	
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