

PROVIDING A CHILD SAFE ENVIRONMENT POLICY

Policy Number	P-Q2-M006	Version Number	2.00
Drafted by	Director of Education	Approved Date: Review Date:	March 2026 January 2027
Responsibility	The Board of Bubup Womindjeka Family and Children’s Centre Association (Inc.) (See Definitions)		
Related Service Policies	<ul style="list-style-type: none"> • Acceptance and Refusal of Authorisations Policy • Administration of First Aid Policy • Administration of Medication Policy • Anaphylaxis Policy • Asthma Policy • Child Protection Policy • Code of Conduct Policy • Complaints and Grievances Policy • Dealing with Infectious Diseases Policy • Dealing with Medical Conditions Policy • Diabetes Policy • Emergency and Evacuation Policy • Enrolment and Orientation Policy • Epilepsy Policy • Excursions and Service Events Policy 	<ul style="list-style-type: none"> • Hygiene Policy • Incident, Injury, Trauma and Illness Policy • Inclusion and Equity Policy • Interactions with Children Policy • Nutrition and Active Play Policy • Occupational Health and Safety Policy • Participation of Volunteers and Students Policy • Privacy and Confidentiality Policy • Road Safety and Safe Transport Policy • Staffing Policy • Sun Protection Policy • Supervision of Children Policy • Water Safety Policy 	
Legislation and Standards	<p>Relevant legislation and standards include but are not limited to:</p> <ul style="list-style-type: none"> • <i>Children, Youth and Families Act 2005</i> (Vic) • <i>Child Safety and Wellbeing Act 2005</i> (Vic) • <i>Charter of Human Rights and Responsibilities Act 2006</i> (Vic) • <i>Child Safe Standards</i> (Vic) • <i>Crimes Amendment (Protection of Children) Act 2014</i> (Vic) • <i>Education and Care Services National Law Act 2010</i> (Vic): including but not limited to Sections 162A, 165, 166, 167 • <i>Education and Care Services National Regulations 2011</i> (Vic): including but not limited to Regulations 16, 17, 82, 83, 84, 85, 86, 99, 100, 101, 102, 103, 115, 122, 123, 124, 145, 162A, 165, 166, 167, 168(2) (h), 169, 170, 171, 175 • <i>Education Training and Reform Act 2006</i> (Vic) (As amended in 2014) • <i>Family Law Act 1975</i> (Cth) • <i>National Quality Standard</i>, including Quality Area 2: Children’s Health and Safety • <i>Reportable Conduct Scheme</i> administered by the Victorian Government Social Services Regulator • <i>Working with Children Act 2005</i> (Vic) • <i>Working with Children Regulations 2006</i> (Vic) • <i>Wrongs Act 1958</i> (Vic) 		
Sources	<ul style="list-style-type: none"> • Australian Human Rights Commission: www.humanrights.gov.au • <i>Charter of Human Rights and Responsibilities Act 2006</i> (Vic): www.legislation.vic.gov.au • <i>Cultural Safety for Aboriginal Children Tip Sheet – Child Safe Organisations</i> https://ccyp.vic.gov.au/assets/resources/tipsheet-cultural-safety-aboriginal-children.pdf • Commission for Children and Young People (CCYP): https://ccyp.vic.gov.au/ • <i>Keeping Our Kids Safe: Cultural Safety and the National Principles for Child Safe Organisations</i> https://www.vacca.org/content/Document/SNAICC-VACCA-OCS-ChildSafeReport-LR-with-alt-tags-May2021.pdf 		

- The United Nations Convention on the Rights of the Child: www.unicef.org
- Victorian Institute of Teaching: www.vit.vic.edu.au
- Working with Children (WWC) Check: www.workingwithchildren.vic.gov.au
- The Orange Door (formerly Child FIRST) <https://www.orangedoor.vic.gov.au/>
- Protecting children training: Mandatory reporting and other obligations [Protecting children: Mandatory reporting and other obligations | vic.gov.au](http://www.vic.gov.au/protecting-children-mandatory-reporting-and-other-obligations)
- Early Childhood Workforce Register: [Early Childhood Workforce Register | vic.gov.au](http://www.vic.gov.au/early-childhood-workforce-register)
- Victorian Early Childhood Regulatory Authority (VECRA) [Victorian Early Childhood Regulatory Authority \(VECRA\) | vic.gov.au](http://www.vic.gov.au/vicarian-early-childhood-regulatory-authority-vecra)
- Department of Families, Fairness and Housing (DFFH) Child Protection [Reporting child abuse - DFFH Services](http://www.vic.gov.au/reporting-child-abuse-dffh-services)
- Australian National Government Mandatory Child Safety Training (Gecko) <https://learning.education.gov.au/register>

AUTHORISATION

This policy will be adopted by the Bubup Womindjeka Family and Children's Centre Board of Governance on 15th of August 2016.

PURPOSE

This policy provides a clear set of processes and procedures for Bubup Womindjeka Family and Children's Centre to:

- ensure children at the service are provided with a safe environment at all times, which extends to online environments
- the promotion of a culture of child safety and wellbeing within the service
- provide a safe environment for all children which ensures their safety, health and wellbeing
- promote the cultural safety of all children
- effectively identify, reduce and remove risks of child abuse
- intervene when a child may be at risk of abuse or neglect
- involve children in child safety including listening to children and incorporating their views about how to provide a safe environment
- make staff aware of their legal and duty of care obligations to report child abuse and neglect

PRINCIPLES

Bubup Womindjeka Family and Children's Centre:

- is committed to the rights of all children to feel safe, and be safe at all times, including:
 - promoting the cultural safety of Aboriginal children
 - promoting the cultural safety of children from culturally and linguistically diverse backgrounds
 - promoting the safety of children with a disability
- values, respects and cares for children
- has zero tolerance of discrimination and racism and expectations that staff and volunteers will act on incidents of racism
- fosters opportunities for each child to participate, express their views and to learn and develop
- always acts in the best interests of each child and has zero tolerance of child abuse
- at all times, reasonable precautions and adequate supervision ensure children are protected from harm and hazard
- takes all reasonable steps to ensure the health, safety and wellbeing of children at all times, whilst also promoting their learning and development
- actively manages the risks of abuse or harm to each child, including fulfilling our duty of care (refer to *Definitions*) and legal obligations to protect children and prevent any reasonable, foreseeable risk of injury or harm

- continuously improves the way our service identifies risks of and responds to child abuse, and encourages reporting and improved responses to allegations of abuse.

SCOPE

This policy applies to the Approved Provider, Persons with Management or Control, Nominated Supervisor, Persons in day-to-day charge, staff, contractors, volunteers, students on placement, parents/guardians, children and others attending the programs and activities of Bubup Womindjeka Family and Children's Centre, including during offsite excursions and activities.

DEFINITIONS

The terms defined in this section relate specifically to this policy.

Child: A child or young person is a person under 18 years of age.

Child abuse: (In the context of this policy) refers to an act or omission by an adult that endangers or impairs a child's physical and/or emotional health or development. Child abuse can be a single incident but often takes place over time. Abuse, neglect and maltreatment (refer to *Definitions*) are generic terms used to describe situations in which a child may need protection. Child abuse includes any and all of the following:

Physical abuse: When a child suffers or is likely to suffer significant harm from an injury inflicted by a parent/guardian, caregiver or other adult. The injury may be inflicted intentionally, or be the consequence of physical punishment or the physically aggressive treatment of a child. Physical injury and significant harm to a child can also result from neglect by a parent/guardian, caregiver or other adult. The injury may take the form of bruises, cuts, burns or fractures, poisoning, internal injuries, shaking injuries or strangulation.

Sexual abuse: When a person uses power or authority over a child, or inducements such as money or special attention, to involve the child in sexual activity. It includes a wide range of sexual behaviour from inappropriate touching/fondling of a child or exposing a child to pornography, to having sex with a child and grooming with the intent of committing child sexual abuse.

Emotional and psychological abuse: When a child's parent or caregiver repeatedly rejects the child or uses threats to frighten the child. This may involve name calling, put downs or continual coldness from the parent or caregiver, to the extent that it significantly damages the child's physical, social, intellectual or emotional development.

Neglect: The failure to provide a child with the basic necessities of life, such as food, clothing, shelter, medical attention or supervision, to the extent that the child's health and development is, or is likely to be, significantly harmed.

Family violence: When children and young people witness or experience the chronic, repeated domination, coercion, intimidation and victimisation of one person by another through physical, sexual and/or emotional means within intimate relationships. Contrary to popular belief, witnessing episodes of violence between people they love can affect young children as much as if they were the victims of the violence. Children who witness regular acts of violence have greater emotional and behavioural problems than other children.

Racial, cultural, religious abuse: Conduct that demonstrates contempt, ridicule, hatred or negativity towards a child because of their race, culture or religion. It may be overt, such as direct racial vilification or discrimination, or covert, such as demonstrating a lack of cultural respect (attitude and values) and awareness (knowledge and understanding) or failing to provide positive images about another culture.

Bullying: Repeated verbal, physical, social or psychological behaviour that is harmful and involves the misuse of power by an individual or group towards one or more persons. Bullying occurs when one or more people deliberately and repeatedly upset or hurt another person, damage their property, reputation or social acceptance.

Child Safe Environment: an environment where children's safety and wellbeing are at the centre of the organisations values and actions, children's voices are heard and valued, genuine engagement with children is

emphasised, conditions reduce the likelihood of harm to children and increase the likelihood of identifying harm by responding to concerns, disclosures, allegations, or suspicions.

Child sex offender: Someone who sexually abuses children, and who may or may not have prior convictions.

Child protection: The term used to describe the whole-of-community approach to the prevention of harm to children. It includes strategic action for early intervention, for the protection of those considered most vulnerable and for responses to all forms of abuse.

Child protection notification: A notification to the Child Protection Service by a person who believes that a child is in need of protection.

Child Protection Service (also referred to as Child Protection): The statutory child protection service provided by the Victorian Department of Families, Fairness and Housing (DFFH), to protect children and young people at risk of abuse and neglect. This service also works closely with Family Services (including The Orange Door) to support the assessment and engagement of vulnerable children and families in community-based services.

Code of conduct: A set of rules or practices that establish a standard of behaviour to be followed by individuals and organisations. A code of conduct defines how individuals should behave towards each other and towards other organisations and individuals in the community (refer to *Code of Conduct Policy*).

Contractor: A person or company that undertakes a contract to provide materials or labour to perform a service or do a job. Examples include photographer, tradesperson, people contracted to provide an incursion.

Cultural Safety: providing an environment that is safe for all people, including but not limited to Aboriginal children; an environment that has integrity and respect for all meanings, knowledge, and experiences of being (refer to source *Cultural Safety for Aboriginal Children Tip Sheet – Child Safe Organisations*)

Disclosure: (In the context of this policy) refers to a statement that a child or young person makes to another person that describes or reveals abuse.

Duty of care: A common law concept that refers to the responsibilities of organisations and staff to provide people with an adequate level of protection against harm and all reasonable foreseeable risk of injury. In the context of this policy, duty of care refers to the responsibility of education and care services and their staff to provide children with an adequate level of care and protection against foreseeable harm and injury.

Maltreatment: (In the context of this policy) refers to physical and/or emotional mistreatment, and/or lack of care of the child. Examples include sexual abuse, the witnessing of family violence and any non-accidental injury to a child.

Mandatory reporting: The legal obligation of certain professionals and community members to report when they believe, on reasonable grounds, that a child is in need of protection from harm. All early childhood workers, including approved providers, students and volunteers are mandatory reporters, and must make a report to Victoria Police and/or Child Protection as soon as is practicable if, during the course of acting out their professional roles and responsibilities, they form a belief on reasonable grounds (refer to *Definitions*) that:

- a child has suffered, or is likely to suffer, significant harm as a result of physical and/or sexual abuse (refer to *Definitions*) **and**
- the child's parents/guardians have not protected, or are unlikely to protect, the child from harm of that type.

Mandatory reporters must also follow processes for responding to incidents, disclosures or suspicions of child abuse to fulfil all their legal obligations (refer to Attachment 3: Processes for responding to and reporting suspected child abuse).

Neglect: see Child abuse definition above.

Negligence: Doing, or failing to do something that a reasonable person would, or would not do in a certain situation, and which causes another person damage, injury or loss as a result.

Notifiable complaint: A complaint that alleges a breach of the Act or Regulation, or alleges that the safety, health or wellbeing of a child at the service may have been compromised. Any complaint of this nature must be reported by the Nominated Supervisor to the Regulatory Authority within 24 hours of the complaint being made (Section 174(2) (b), Regulation 176(2) (b)).

Written notification of complaints must be submitted via the ACECQA portal [National Quality Agenda \(NOA\) IT System](#). If the Nominated Supervisor is unsure whether the matter is a notifiable complaint, it is good practice to contact the Regulatory Authority for confirmation.

Negative Notice: A notification that is shared to all listed organisations of the applicant/cardholder that the applicant/cardholder has failed the WWC Check or had their card revoked and is prohibited from engaging in any child related work.

Organisational duty of care: The statutory duty organisations have to take reasonable precautions to prevent sexual and/or physical abuse of a child.

Offender: A person who mistreats and/or harms a child or young person.

Perpetrator: A person who mistreats and/or harms a child or young person.

Reasonable belief/reasonable grounds: A person may form a belief on reasonable grounds that a child or young person is in need of protection after becoming aware that the child or young person's safety, health or wellbeing is at risk and the child's parents/guardians are unwilling or unable to protect them. There may be reasonable grounds for forming such a belief if:

- a child or young person states that they have been physically or sexually abused
- a child or young person states that they know someone who has been physically or sexually abused (sometimes the child may be referring to themselves)
- someone who knows the child or young person states that the child or young person has been physically or sexually abused
- a child shows signs of being physically or sexually abused
- the person is aware of persistent family violence or parental substance misuse, psychiatric illness or intellectual disability or other factors that are impacting on the child or young person's safety, stability or development
- the person observes signs or indicators of abuse, including non-accidental or unexplained injury, persistent neglect, poor care or lack of appropriate supervision
- a child's/young person's actions or behaviour may place them at risk of significant harm and the parents/guardians are unwilling or unable to protect the child.

Reportable allegation: any allegation that an employee, volunteer or student has committed child abuse (refer to *Definitions*)

Serious incident: A serious incident (regulation 12) is defined as any of the following:

- the death of a child while being educated and cared for at the service or following an incident at the service
- any incident involving serious injury or trauma while the child is being educated and cared for, which
 - a reasonable person would consider required urgent medical attention from a registered medical practitioner; or
 - the child attended or ought reasonably to have attended a hospital e.g. a broken limb
- any incident involving serious illness of a child while that child is being educated and cared for by a service for which the child attended, or ought reasonably to have attended, a hospital e.g. severe asthma attack, seizure or anaphylaxis.
- any emergency for which emergency services attended. NOTE: This means an incident, situation or event where there is an imminent or severe risk to the health, safety or wellbeing of a person/s at an education and care service. It does not mean an incident where emergency services attended as a precaution.

- a child appears to be missing or cannot be accounted for at the service
- a child appears to have been taken or removed from the service in a manner that contravenes the National Regulations
 - a child was mistakenly locked in or out of the service premises or any part of the premises.

Examples of serious incidents include amputation (e.g. removal of fingers), anaphylactic reaction requiring hospitalisation, asthma requiring hospitalisation, broken bone/fractures, bronchiolitis, burns, diarrhoea requiring hospitalisation, epileptic seizures, head injuries, measles, meningococcal infection, sexual assault, witnessing violence or a frightening event.

If the Nominated Supervisor is not aware that the incident was serious until sometime after the incident, they must notify the regulatory authority within 24 hours of becoming aware that the incident was serious.

Notifications of serious incidents should be made through the NQA IT System portal (www.acecqa.gov.au). If this is not practicable, the notification can be made initially in whatever way is best in the circumstances.

The Orange Door: A Victorian community-based intake and referral service linked with Family Services. The Orange Door ensures that vulnerable children, young people and their families are effectively linked to relevant services, including Child Protection. The Orange Door was formerly known as Child FIRST.

Volunteer: Parent/guardian, family member or community member who attends the service to assist the service in some capacity.

Young person: In Victoria, under the *Children, Youth and Families Act 2005*, a child or young person is a person under 18 years of age.

BACKGROUND

Under the *Education and Care Services National Regulations 2011*, the Approved Provider or Person with Management or Control must ensure that all staff are familiar with current policies and procedures with regard to child safety and protection, including state and territory legislative responsibilities and their obligations under these laws (Regulation 84).

The Approved Provider, Persons with Management Control, Nominated Supervisor, Persons in Day-to-Day Charge, staff, contractors and volunteers of early childhood services have legal and duty of care obligations to protect children under their supervision and care.

Duty of care obligations (refer to *Definitions*) require the Approved Provider, Person with Management or Control, Nominated Supervisor, Persons in Day-to-Day Charge, and staff to take reasonable steps to protect children from injury that is reasonably foreseeable.

In addition, organisations have a duty of care to take reasonable precautions to prevent the abuse of a child by an individual associated with the organisation while the child is under its care, supervision or authority (refer to Organisational duty of care in *Definitions*).

The duty will relate to individuals associated with an organisation, including but not limited to Board members, employees, volunteers and contractors.

The Children, Youth and Families Act 2005 provides the legislative basis for the provision of services to vulnerable children, young people and their families, and places children's best interests at the heart of decision-making and service delivery.

Any person who forms a reasonable belief (refer to *Definitions*), that a child is in need of protection may report their concerns to Child Protection (refer to *Definitions*).

Protection (refer to *Definitions*) as soon as practicable if, during the course of their roles and responsibilities they form a reasonable belief that:

- A child is likely to suffer, or has suffered, significant harm as a result of physical abuse and/or sexual abuse, **and**
- The child's parents have not protected, or are unlikely to protect, the child from harm of that type.

Victorian organisations that provide services to children are required under the *Child Safety and Wellbeing Act 2005* to ensure that they implement compulsory minimum Child Safe Standards to protect children from harm. The standards aim to drive continuous improvement in the way services prevent and report child abuse and respond to allegations of child abuse. Standard 2 requires services to have a child safe policy or statement of commitment to child safety.

Three **criminal offences** in the *Crimes Amendment (Protection of Children) Act 2014* protect children from child abuse:

- **Failure to disclose:** All adults (not just those working with children) have a legal duty to report information about child sexual abuse to Victoria Police. The offence applies to any adult who forms a reasonable belief that a sexual offence has been committed by an adult against a child under 16 and fails to report that information to the Victoria Police.
- **Failure to protect:** The offence applies to people within organisations who hold positions of authority within an education and care service, such as the Approved Provider, Person with Management or Control, the Nominated Supervisor or the Person in day to day Charge and who know of the substantial risk that another adult associated with the organisation may commit a sex offence and they have the power or responsibility to remove or reduce the risk but negligently fail to do so.
- **Grooming offence:** The offence targets predatory conduct by an adult with the intent of committing child sexual abuse. Conduct may include communication, including online communication, with a child under the age of 16 or their parents.

Child protection and child safety training in early childhood

Early childhood education and care (ECEC) staff in Australia must complete child safety training and child protection training.

The training assists people working directly with children to understand the child safety framework and requirements for keeping children safe.

Both child safety training and child protection training are mandated for specific roles under the National Law and National Regulations.

Child protection training – Victoria

Nominated supervisors, persons in day-to-day charge of a service, staff members, students and volunteers who work directly with children in ECEC settings in Victoria must complete EC PROTECT [Protecting children: Mandatory reporting and other obligations](#) training every 12 months.

Child safety training – National

Everyone working and volunteering in the ECEC sector, regardless of whether they work directly with children, must also complete national child safety training. This is different to the child protection training.

The national training was developed by the Australian Centre for Child Protection and is available on the [Australian Government's website](#).

National Early Childhood Worker Register

The National Early Childhood Worker Register an online system where approved providers record who works or volunteers in approved education and care services and is required under National Law and National Regulations. It helps regulatory authorities to see who is working in the sector and where, so they can monitor, identify and respond to risks and keep children safe. Approved providers are responsible for entering and keeping staff information up to date in the Worker Register. Contractors, Students and volunteers must also be included on the register.

ROLE RESPONSIBILITIES

The Approved Provider (Board of Governance) is responsible for:

The Bubup Womindjeka Family and Children's Centre Board is the Approved Provider and has ultimate responsibility for the management and control of the service.

The Board delegates operational responsibility and day to day management of the service to the Nominated Supervisor and monitors the performance of the organisation, including responsibilities contained in this policy, through regular reporting and by ensuring appropriate resources are available to carry out the organisation's functions.

The Nominated Supervisor and Persons in Day-to-Day Charge are responsible for:

- ensure that obligations under the Education and Care Services National Law and National Regulations are met
- ensure that the Providing a child safe environment policy and procedures are implemented, the appropriate risk assessments and action plans are completed, and all identified actions are taken to minimise the risks to children's health and safety (also known as a risk minimisation plan)
- ensure mandatory child protection (child safe and mandatory reporting) training has been completed by the relevant persons as required by the service's jurisdiction, as required by section 162A of the National Law
- advising staff of current child protection legislation, and their legal and duty of care obligations (Regulation 84)
- undertaking child safety reviews and developing an action plan in consultation with staff, parents/guardians and children to maintain Child Safe Standards at Bubup Womindjeka Family and Children's Centre (refer to *Sources*)
- conducting recruitment and induction processes for staff in line with this policy (refer to Attachment 1 – Processes for incorporation of child safety into the recruitment and management of staff)
- screening contractors, volunteers and students in line with their roles (refer to Attachment 2 – Guidelines for incorporation of child safety into recruitment and management of contractors, volunteers and students)
- ensuring that contractors, volunteers, students, parents/guardians and other visitors to the service are not left with sole supervision of individual children or groups of children
- ensuring that contact is prevented or responding if it has occurred, when the service has been notified of a court order prohibiting an adult from contacting an enrolled child
- ensuring staff, and where appropriate, contractors, volunteers and students undertake appropriate training on child safety, including recognising the signs and symptoms of child abuse (refer to *Definitions*), knowing how to respond, and understanding responsibilities and processes for reporting (refer to Attachment 3 – Processes for responding to and reporting suspected child abuse)
- ensuring procedures for reporting and responding to suspected child abuse or neglect are promoted across the service and regularly reviewed in partnership with staff and parents/guardians, and where appropriate contractors, volunteers, students and children (refer to Attachment 3: Processes for responding to and reporting suspected child abuse)
- offering support to the child and their family, and to staff in response to concerns or reports relating to the safety, health and wellbeing of a child at Bubup Womindjeka Family and Children's Centre
- maintaining co-operative relationships with appropriate services and/or professionals (including The Orange Door) in the best interests of children and their families
- ensuring processes for responding to and reporting are followed when there are significant concerns for the safety, health or wellbeing of a child at the service (refer to Attachment 3 – Processes for responding to and reporting suspected child abuse)
- notifying the Regulatory Authority within 24 hours of a serious incident (refer to *Definitions*) occurring at the service
- notifying the Regulatory Authority within 24 hours in writing of becoming aware of a notifiable complaint (refer to *Definitions*) or allegation regarding the safety, health and/or welfare of a child at the service
- notifying the Commission for Children and Young People within 3 business days of becoming aware of a reportable allegation (refer to *Definitions*)
- investigating an allegation (subject to police clearance on criminal matters or matters involving family violence), advising the Commission for Children and Young People who is undertaking the investigation
- managing the risks to children whilst undertaking the investigation
- updating the Commission for Children and Young People within 30 calendar days with detailed information about the reportable allegation and any action
- notifying the Commission for Children and Young People of the investigation findings and any disciplinary action taken (or the reasons no action was taken)
- upon receiving a Negative Notice notification, the Nominated Supervisor will contact the staff member, student or contractor directly to advise that they are immediately prohibited from attending the service and engaging in any child-related work.
- maintaining confidentiality at all times (refer to *Privacy and Confidentiality Policy*)

- providing appropriate resources and training to assist staff, contractors, volunteers and students to implement this policy (refer to *Sources*)
- protecting the rights of children and families, and encouraging their participation in decision-making
- keeping staff, contractors, parents/guardian, volunteers and students informed of any relevant changes in legislation and practices in relation to this policy
- ensuring continuous improvement in the implementation of the Child Safe Standards in Bubup Womindjeka Family and Children's Centre promoting an organisational culture of accountability for child safety which is open to scrutiny and is continuously reviewed and improved (refer to *Sources*)
- ensuring the implementation of strategies to prevent child abuse in consultation with staff and stakeholders
- making all staff aware of this policy, the Code of Conduct Policy and the Interactions with Children Policy and holding them to account for the behavioural expectations identified.
- implementing and reviewing this policy in consultation with the educators, staff and parents/guardians and children
- ensuring an explicit statement of Bubup Womindjeka's Family and Children's Centre's commitment to child safety is included in all advertising promotion for the organisation
- helping all stakeholders to acknowledge and appreciate the strengths of Aboriginal culture and understand its importance to the wellbeing and safety of Aboriginal children
- ensure the safe use of online environments at the service
- updating all staff information and ensuring accuracy of information/details into the Early Childhood Workforce Register.

Educators and all other staff are responsible for:

- fulfilling their legal responsibilities and duty of care to protect children and to keep children safe and to maintain their rights
- be aware of current child protection legislation, including the mandatory reporting requirements and obligations
- contributing to an organisational culture of child safety and ensuring safe online environments for all children
- to maintain professional standards and ensure constant supervision of children, staff are not permitted to use personal mobile phones or electronic devices during work hours unless in designated break areas. All staff are expected to model appropriate and safe technology use at all times.
- identifying the potential for child abuse at the service, and developing and implementing effective prevention strategies in consultation with the Nominated Supervisor and Person in day to day Charge
- following processes for responding to and reporting suspected child abuse (Attachment 3: Processes for responding to and reporting suspected child abuse)
- undertaking appropriate training on child protection, including recognising the signs and symptoms of child abuse (refer to *Definitions*), knowing how to respond, and understanding responsibilities and processes for reporting (refer to Attachment 3 – Processes for responding to and reporting suspected child abuse)
- supporting the maintenance of Child Safe Standards in Bubup Womindjeka Family and Children's Centre in consultation with the Nominated Supervisor and Person in day to day Charge at the service
- notifying the Nominated Supervisor , Person in day to day Charge, immediately on becoming aware of any concerns, complaints or allegations regarding the safety, health and welfare of a child at Bubup Womindjeka Family and Children's Centre
- offering support to the child and their family in response to concerns or reports relating to the safety, health and wellbeing of a child at Bubup Womindjeka Family and Children's Centre
- co-operating with other services and/or professionals (including The Orange Door) in the best interests of children and their families
- informing families of support services available to them (such as The Orange Door), and of the assistance these services can provide
- conducting activities so that no child is left alone (or is out of sight) with a contractor, visitor, volunteer, student or parent/guardian at the service
- ensure that no children at any time, are permitted in staff only areas – e.g. Laundry, kitchen, staffroom and planning room.
- in instances where children are engaged in tasks/activities outside the classroom (e.g., assisting with kitchen trolleys, collecting materials, or participating in excursions), a minimum of two children must be accompanied together
- monitor and maintain staff to child ratios to ensure adequate supervision of children, including when using digital technologies and online environments
- following the Bubup Womindjeka Family and Children's Centre's processes where the service has been notified of a court order prohibiting an adult from contacting an enrolled child

- maintaining confidentiality at all times (refer to *Privacy and Confidentiality Policy*)
- contributing to a review of this policy in consultation with the Nominated Supervisor and Person in day to day Charge
- educating and empowering children to talk about events and situations that make them feel uncomfortable
- ensuring that children at the service are not subjected to any form of corporal punishment, or any discipline that is unreasonable or excessive in the circumstances
- using appropriate resources and undertaking training to assist with the implementation of this policy (refer to *Sources*)
- encouraging and supporting children to express their culture and enjoy their cultural rights
- actively supporting and facilitating participation and inclusion within BWFCC by Aboriginal children and their families
- abiding by the service's *Code of Conduct Policy* and *Interactions with Children Policy*

Parents/guardians are responsible for:

- reading and complying with this policy
- reporting any concerns, including in relation to potential child abuse, to the appropriate child protection authorities or the police if immediate police attention is required
- abiding by the service's *Code of Conduct*.

Contactors, volunteers and students, while at the service, are responsible for:

- following this policy and its procedures
- contributing to an organisational culture of child safety and ensuring safe online environments for all children
- undertaking appropriate training on child protection, including recognising the signs and symptoms of child abuse (refer to *Definitions*), knowing how to respond, and understanding responsibilities and processes for reporting (refer to Attachment 3 – Processes for responding to and reporting suspected child abuse)
- encouraging and supporting children to express their culture and enjoy their cultural rights
- following BWFCC's students and volunteer's policies and processes.

EVALUATION

In order to assess whether the values and purposes of the policy have been achieved, the Nominated Supervisor will:

- regularly seek feedback from everyone affected by the policy regarding its effectiveness, particularly in relation to identifying and responding to child safety concerns
- monitor the implementation, compliance, complaints and incidents in relation to this policy
- keep the policy up to date with current legislation, research, policy and best practice
- revise the policy and procedures as part of the service's policy review cycle, or as required
- notify parents/guardians at least 14 days before making any changes to this policy or its procedures (Regulation 172(2)).

ATTACHMENTS

- Attachment 1: Processes for incorporation of child safety into recruitment and management of staff
- Attachment 2: Guidelines for incorporation of child safety into recruitment of contractors, volunteers and students
- Attachment 3: Processes for responding to and reporting suspected child abuse

Relevant Forms/Documents

Responding to Suspected Child Abuse: Template for all Victorian Early Childhood Services

[Responding to suspected child abuse template \(PDF, 268KB\),](#)

[Responding to suspected child abuse template - Editable version \(DOCX, 182 KB\)](#)

Version History

Date	Version	Author/s	Details
20 January 2015	1.00	Chief Executive Officer	New policy – incorporating new Child Safe Standards
August 2019	2.00	Director of Education	Policy reviewed and updated
January 2021	2.00	Director of Education	Policy reviewed and editorial amendments made.
January 2022	2.00	Director of Education	Policy reviewed and linked government websites updated to reflect new government department structure as well as editorial amendments made.
January 2023	2.00	Director of Education	Policy reviewed and updated to reflect the current Child Safe Standards
January 2024	2.00	Director of Education	Policy reviewed; changes made to Child FIRST transition to The Orange Door, and Sources updated.
January 2025	2.00	Director of Education	Policy reviewed and updated. New link added.
June 2025	2.00	Director of Education	Responsibilities of educators and other staff updated – new requirement added in.
September 2025	2.00	Director of Education.	Policy reviewed and responsibilities of educators and other staff updated – new requirement added in. Early Childhood Workforce Register requirement added in.
March 2026	2.00	Inclusion Support Co-Ordinator	Policy reviewed, updated information regarding the National Mandatory child protection and child safety training, as well as the National Early Childhood Worker Register. Updated relevant links and contact details.

ATTACHMENT I

Processes for incorporation of child safety into the recruitment and management of staff

The following processes for the recruitment and management of staff at Bubup Womindjeka Family and Children's Centre demonstrates the commitment to maximising the safety of children and deterring unsuitable and inappropriate persons from attempting to work at the service.

Process	Description
1. Identify Hiring Requirement	<ul style="list-style-type: none"> Human Resources Coordinator (HRC) and the Director of Education (DoED) discuss the need for the position. This may include experience and qualifications required, number of new positions required, etc. The recruitment and selection process cannot commence until HRC receives the approval from DoED and Executive Officer (EO). HRC prepares Job analysis: job description and job specification. HRC to ensure all recruitment processes align with The Equal Opportunity Act 2010 and Child Safe Standards.
2. Advertisement	<ul style="list-style-type: none"> HRC runs the recruitment sources: Internal sources and External sources. Internal recruitment: HRC advertises the vacant position both internally and externally. Sample of Internal sources are job posting to all employee, employee referrals, transfer, promotion, previous applicants, former employee, etc. External recruitment: To attract the external candidates through recruitment agency, online job board, institution recruitment, walk-in, etc. All job advertisements include a statement of commitment to maintaining a child safe environment. Job advertisements clearly state our commitment to child safety. Requirement for a current Working with Children Check (WWCC) or Victorian Institute of Teaching registration is included on all job advertisements. Job description clearly outlines responsibilities and accountability
3. Screening and Shortlisting	<ul style="list-style-type: none"> HRC thoroughly reviews all candidates and shortlists candidates with the selection criteria such as cultural fit, experience, motivation, qualification, ability, competencies, etc. Once applicants have been shortlisted, an interview time is arranged via telephone and HRC will send an interview confirmation to applicants via email accordingly, with a request to bring all original documents and qualifications. HRC requested the selected candidate to provide documents such as Working with Children Check/Victorian Institute of Teaching registration, qualifications, CPR/First Aid Certification, Child Protection training.

	<ul style="list-style-type: none"> Working with Children Check or Victorian Institute of Teaching registration is checked at time of interview to ensure that they have not been given a Negative Notice, had their card revoked, suspended or expired.
4. Interview	<ul style="list-style-type: none"> First interview is in-person between the candidates and HRC. Early interview conversations typically focus on candidates' experience, skills, problem solving, attitude, work history, and availability. Questions are behaviour-based and ask the interviewee to provide examples of their past behaviour in specific situations relevant to the job being applied for. Questions regarding relationships with children are values-based and include a consideration of issues such as professional boundaries, resilience and motivation, teamwork, accountability and ethics. More detail is asked for when answers seem incomplete. The successful candidate of the first interview will be asked to have a 45–60 minute work trial in the assigned room to offer the candidate the opportunity to spend time in the learning environments with the Room Leader and educators. HRC will shortlist a small pool of top candidates for final interview. Final interview will be conducted with DoEd and/or EO (only for senior positions).
5. Selection Decision	<ul style="list-style-type: none"> HRC distributes the Candidate Evaluation Form to DoED and the panels members (if any) to fill in their interview's outcome. HRC completes a selection report where appropriate to DoED and EO for the final selection approval. HRC to conduct reference checks by using 'Reference Check Form'. <ul style="list-style-type: none"> at least two referees are contacted (including the current or most recent employer or direct line manager) via telephone or email all referees must have observed the applicant working with children first-hand referees are asked about the candidate's past behaviour including relationships with children, professional boundaries, resilience and motivation, teamwork, accountability and ethics. HRC confirms the new employee's employment conditions, wage, type of employment, level or classification, any awards conditions, etc. with EO and/or DoED.
6. Notification of Outcome	<ul style="list-style-type: none"> HRC prepares the Letter of Offer and notifies the successful candidate via phone and email. HRC confirms the acceptance of offer from the candidate. HRC will inform the candidate if their application has been unsuccessful.
7. Offer of Employment	<ul style="list-style-type: none"> HRC issues an employment contract and a signed contract is to be returned 7 days prior to the commence date. Mandatory policies are shared to the new employees and are required to be read and signed, the Providing a Child Safe Environment Policy, Staff Code of Conduct Policy, Privacy and Confidentiality Policy.



	<ul style="list-style-type: none"> The template letter of offer includes a statement about what is expected of the staff member in terms of commitment and responsibilities for child safety and wellbeing.
<p>8. Onboarding and Induction</p>	<ul style="list-style-type: none"> HRC conducts the induction process with the new employee within first week of employment. All staff members receive an induction adjusted to each role’s requirements, duties, risks and responsibilities in relation to child safety and wellbeing. The induction covers the organisation’s child safety practices and complaints process as well as reporting, record keeping and information sharing obligations. Information provided to the new staff member on commencing work at the service includes, <i>Providing a Child Safe Environment Policy, Code of Conduct Policy, Complaints and Grievances Policy and Staffing Policy</i> A mentoring or buddy system for staff members is in place. Training and education regarding child safety and child protection is provided for all staff. Regular training and education with regard to child safety, child protection and inclusive practices is provided for all staff including, National Mandatory Child Safety training, Vic Gov Child Protection Mandatory Reporting and other obligations training and <i>Respectful Relationships</i> (Childhood/family violence) training. The service leadership team supervise staff members and educators in the children’s learning environment to ensure clear expectations about the role, guide supervision and behaviour guidance practices, as well as on-the-job monitoring of their performance
<p>9. Ongoing Management</p>	<ul style="list-style-type: none"> We support educators to understand the importance of organising themselves and the service’s indoor and outdoor environments to enhance supervision, including when children use digital devices Our supervision practices minimise the need for individual educators to be alone with children We regularly review and critically reflect on our service’s philosophy, policies and procedures with all staff members to ensure all staff, educators, service leaders and the nominated supervisor, maintain their understanding of ethically and culturally safe practices, their roles and responsibilities, and update as necessary Performance reviews consider the staff member’s contribution to creating a child safe environment An internal register is maintained of every staff member’s Working with Children Check card and/or Victorian Institute of Teaching Registration to ensure that no one has been given a Negative Notice, or had their card revoked, suspended or that it has expired Upon receiving a Negative Notice notification of a WWCC or VIT, the Nominated Supervisor will contact the staff member, student or contractor directly to advise that they are immediately prohibited from attending the service and engaging in any child-related work. Each staff member’s information will be recorded and kept up to date in the National Early Childhood Worker Register.

ATTACHMENT 2

Guidelines for incorporation of child safety into the recruitment and management of contractors, volunteers and students

The following guidelines for the recruitment and management of contractors, (refer to *Definitions*), volunteers, and students (refer to *Definitions*) at Bubup Womindjeka Family and Children's Centre, demonstrates commitment to maximising the safety of children and deterring unsuitable and inappropriate persons from attempting to work, volunteer or be on student placement at our service.

- All contractors, students and volunteers are required to provide a valid Working With Children Check card or Victorian Institute of Teaching card or an exemption applies (such as a student or volunteer being under 18 years of age) for people engaged in 'direct contact' in child-related work, including physical contact, face to face contact, oral, written or electronic communication
- All contractors, students and volunteers working directly with children are required to complete mandatory reporting training and provide a copy of their certificate of completion (this training should have been completed within the last 12-months)
- All students and volunteers meet with the Nominated Supervisor or Persons in day-to-day charge to assess the nature of the work or task, determine their suitability to the role and gain an understanding of any previous experience of engaging with children
- All students and volunteers receive written correspondence from the Nominated Supervisor before their commencement with includes information about the service, our policies as well as child safety
- All students and volunteers complete an induction with the Nominated Supervisor to review the BW FCC Student and Volunteer Guidelines and Expectations document, which outlines expectations about the role, as well as information about children's safety and wellbeing including about how to raise a concern about child
- All students and volunteers are shared a copy of our centre policies, including the *Students and Volunteers Policy, Providing a Child Safe Environment Policy, Code of Conduct Policy*
- In relation to students, we work closely with reputable higher education institutes to arrange practical placements which supports to determine if the individual is suitable to working directly with children
- A staff member will provide supervision to ensure clear expectations about the role and responsibilities
- Contractors, volunteers or students (or visitors) are not to be left alone with children
- All students and volunteers information will be recorded and updated as required on the National Early Childhood Worker Register.

ATTACHMENT 3

Processes for responding and reporting to an incident, disclosure or suspicion of child abuse

Overview

- All early childhood service staff have a duty of care to take reasonable steps to protect children in their care from harm.
- Staff **must act** as soon as they witness or form a reasonable belief that a child has been, or is at risk of being abused.
- Staff **must act** if you form a suspicion/reasonable belief, even if you are unsure and have not directly observed child abuse (if the victim or another person tells you about the abuse).
- Staff **must report internally** to the Nominated Supervisor or Persons in day-to-day Charge as soon as they witness or form a reasonable belief that a child has been, or is at risk of being abused.
- If staff witness or form a reasonable belief that a child has been, or is at risk of being abused, regardless of the advice of the Nominated Supervisor or any other staff member, the staff **must still make a report** to the Department of Families, Fairness and Housing (DFFH) Child Protection and/or Victoria Police.
- Staff should make sufficient enquiries to form a reasonable belief and to determine a child's immediate needs. However, once a reasonable belief has been formed, it's not the staff members role to investigate. This is the role of Department of Families, Fairness and Housing (DFFH) Child Protection or Victoria Police.
- If staff hold significant concerns for a child's wellbeing, which do not appear to be a result of child abuse they must still act.
- Privacy is maintained, and information is only disclosed on a need-to-know basis.
- Permission is not required from parents/guardians of a child to make a report where abuse is suspected.

Four Critical Actions for Early Childhood Services

Early Childhood Services have a range of reporting and legal obligations to report suspected child abuse and provide ongoing appropriate support. Follow the Early Childhood Protection and Child Safe Standards Four Critical Actions when responding to an incident, disclosure or suspicion of child abuse.

Action 1: Responding to an emergency

Ensure immediate safety

If a child has just been abused, or is at immediate risk of harm you must take reasonable steps to protect them. These include:

- separating the alleged victim and others involved, ensuring all parties are supervised by a service staff member
- arranging and providing urgent medical assistance where necessary by:
- administering first aid assistance
- calling 000 for an ambulance and following any instructions from emergency service officers/paramedics
- calling 000 for urgent police assistance if the person who is alleged to have engaged in the abuse poses an immediate risk to the health and safety of any person (you should also identify a contact person at the service for future liaison with police).

Action 2- Report to authorities

Reporting when the source of the suspected abuse is within the service:

Bubup Womindjeka Family and Children's Centre



If the source of suspected abuse comes from within the service (this includes any forms of suspected child abuse involving a staff member, contractor or volunteer):

- Report internally to the Nominator Supervisor or Person in day-to-day charge.
- Contact Victoria Police via your local police station (where appropriate they will refer you on to the local Sexual Offences and Child Abuse Investigation Team (SOCIT)). South Melbourne Police Station - Phone: (03) 9257 3800
- Make a report to the Department of Families, Fairness and Housing (DFFH) Child Protection. DFFH Child Protection South Division - Phone: 1300 555 526
- Report to the Social Services Regulator in line with the requirements of the Reportable Conduct Scheme - Phone: 1300 310 778 Email: contact@ssr.vic.gov.au
- Also notify the Victorian Early Childhood Regulatory Authority (VECRA) via the National Quality Agenda (NQA ITS) portal (www.acecqa.gov.au)

Victorian Early Childhood Regulatory Authority (VECRA) –
Southern Metropolitan Regional Office
Level 5, 165–169 Thomas Street Dandenong Vic 3175 phone: [03 8904 2500](tel:0389042500)
email: vecra.southern.metro@education.vic.gov.au

Reporting when the source of suspected abuse is within the family or community:

If the source of suspected abuse comes from within the family or community:

- Report to DFFH Child Protection if a child is considered to be:
 - in need of protection due to child abuse
 - at risk of being, harmed (or has been harmed), and the harm has had, or is likely to have, a serious impact on the child's safety, stability or development.
- Report suspected sexual abuse (including grooming) to Victoria Police
- Notify the Victorian Early Childhood Regulatory Authority (VECRA) of any circumstance or complaints arising at the service that poses a risk to the health, safety or wellbeing of a child or children attending the service (Regulation 175 (2) (c) including:
 - occurrences of sexualised play between children
 - where children are being or may be at risk of being subjected to physical, emotional or sexual abuse including instances where children are observed displaying concerning behaviour that may indicate they are being subject to abuse

Documentation of reports

Records are kept about all child safety concerns or complaints. These records contain comprehensive descriptions of incidents/ issues of concern and provide evidence for actions taken, including reports made to authorities or professional bodies and follow-up actions to be completed.

The records are stored in accordance with the service's Privacy and Confidentiality Policy.

As an early childhood staff member, you must keep clear and comprehensive notes relating to incidents, disclosures and allegations of child abuse.

This may be critical for further investigations and/or legal proceedings.

It's strongly recommended that you use this template:

- [Responding to suspected child abuse template \(PDF, 268KB\)](#)

- [Responding to suspected child abuse template - Editable version \(DOCX, 182 KB\)](#)

These records will be helpful in making a report of the abuse to the relevant authorities.

All reports must be made within 24 hours of becoming aware of it.

If you require support to complete the template, you should seek support from the Nominated Supervisor.

Strategies for managing a disclosure

Very young children may be unable to disclose abuse. They may be unaware that they are being subject to abuse and/or unaware that the information they are providing is disclosing abuse.

Regardless of the intent of the conversation, it's important that you respond in an appropriate and supportive manner.

It's the role of early childhood staff members to listen and respond appropriately to a child's concerns. You should reassure the child that they have done the right thing in talking to you. Where a child discloses abuse then asks you to keep a secret you should consider stating:

- I am not going to be able to keep your story a secret. I really have to tell someone who is going to be able to help you.

How best to manage a disclosure

When managing a disclosure, you should:

- listen to the child and allow them to speak
- stay calm and not display expressions of panic or shock
- use a neutral tone with no urgency and where possible use the child's language and vocabulary
- be patient and non-judgemental throughout
- highlight to the child that they are doing the right thing in telling you about what has happened and that it is not their fault
- allow the child to talk at their own pace and in their own words
- reassure the child that you believe them and that disclosing the matter was the right thing to do
- use verbal facilitators such as, 'Okay, I see', restate the child's previous statement, and use non-suggestive words of encouragement, designed to keep the child talking in an open-ended way
- tell the child you are required to tell someone who is going to be able to help you.

Action 3: Contact parents or carers

Seeking advice before contacting parents

Before contacting a parent/carer, you must contact the Nominated Supervisor, Victoria Police and/or DFFH Child Protection (depending on who the report has been made to). They will advise about whether it's appropriate to contact parents/carers at this stage.

You will be advised not to contact the parents in circumstances where:

- the parents are alleged to have engaged in the abuse
- a disclosure to the parent/carer may subject the child to further abuse
- the notification is likely to adversely affect the investigation of the incident by the relevant authorities.

Action 4: Providing ongoing support

Making sure a child is safe and supported when attending the service

Where appropriate, services need to provide holistic support to children and families to address the trauma and wellbeing issues associated with child abuse.

Where appropriate, services should consider:

- establishing regular communication with the child's parent/carer to plan support strategies and discuss a child's progress, and the success of any support strategies
- engage allied health professionals with expertise in addressing child abuse and trauma to support the service to design and implement support strategies
- establish a safety plan, in instances where the abuse has been led by a person within the service, and/or visiting the service to mitigate risk of further abuse.
- additional support and/or resources for the needs of Aboriginal and Torres Strait Islander children to promote a culturally safe environment.
- additional support and/or resources for the needs of children with disability,
- additional support and/or resources for children from culturally and linguistically diverse backgrounds.

Support for impacted staff members

It can be stressful for staff involved in any incidents, disclosures or suspicions of child abuse, especially if they have also experienced abuse.

It's recommended that you speak to the Nominated Supervisor about arranging appropriate support.

You should also consider:

- talking to your GP or another allied health professional
- reporting historical or current experiences of abuse to Victoria Police.

Responding to concerns about the wellbeing of a child

If you hold significant concerns for a child's wellbeing, which do not appear to be a result of child abuse you should still act. Visit the [Early Childhood PROTECT Portal](#) which will support you in making appropriate referrals to The Orange Door (formerly Child FIRST) and/or DFFH Child Protection and/or Victoria Police.

The Orange Door ensures that vulnerable children, young people and their families are linked effectively into relevant services, and this may be the best way to connect children and their families with the services they need. This may include circumstances when there are:

- significant parenting problems that may be affecting the child's development
- family conflict, including family breakdown
- families under pressure, due to a family member's physical or mental illness, substance misuse, disability or bereavement
- young, isolated and/or unsupported families
- families experiencing significant social or economic disadvantage that may adversely impact on a child's care or development

If you are unsure whether a witnessed incident, suspicion or disclosure should lead you to form a reasonable belief that child abuse has, or is at risk of occurring you must seek further advice from the Nominated Supervisor, DFFH Child Protection or Victoria Police.