

## CHILD SAFE POLICY

*Effective implementation of child safe standards (OR 01)*

### POLICY OBJECTIVE

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A Child Safe Policy that guides all workers, paid and volunteers throughout the Organisation to protect the physical, emotional, cultural, and social well-being of all children.

### POLICY PURPOSE

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Integricare has a legal and ethical responsibility to provide a safe and friendly environment where all children are respected, valued, and encouraged to reach their full potential. Children's safety is paramount, and we aim to take all practical steps to protect children from harm, ensuring a healthy and safe environment

### DEFINITIONS

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**For the purposes of this policy:**

- Head of Relevant Entity (HRE): This is defined as the Chief Executive Officer of Integricare
- Abuse and harm: are defined as any action, or lack of action, that significantly harms the child's physical, psychological, or emotional health and development.
- Child/Children: An individual under the age of 18 years
- Child-related work: Work that involves direct contact by the worker with a child or children where contact is a usual part of and more than incidental work. This includes oral, written, and electronic communication such as email, instant messaging, social media, and video chats. It may also include a worker or someone who has access to confidential records or information about a child.
  
- Employees of a relevant entity (Integricare) refers to:
  - Integricare staff, any permanent, part-time, temporary, or casual staff employed by Integricare
  - Contractor/Agency staff/Labour Hire Worker any child-related contractor or agency/labour hire worker (e.g.: ANZUK casual): who provides services or undertakes work on behalf of Integricare and is required to hold a working with children check clearance for the purpose of the engagement.
  - Volunteer/s - any member of the public when contributing directly to an Integricare program/service/event. For the purposes of this Policy, the definition of a volunteer also includes students on placement from an educational institution.
  - Board Member: any member of the Integricare Board of Management
  
- **Reportable Allegation:** an allegation that the employee has engaged in conduct that may be reportable conduct, whether or not the conduct is alleged to have occurred during the employee's employment with Integricare:
  - a) if the employee holds, or is required to hold, a Working with Children check clearance for the purpose of employment with Integricare—an allegation that the employee has engaged in conduct that may be reportable conduct, whether or not the conduct is alleged to have occurred in the course of the employee's employment, or
  - b) if the employee is not required to hold a working with children check clearance for the purpose of employment with Integricare—an allegation that the employee has engaged in conduct that may be reportable

conduct unless the conduct is alleged to have occurred outside the course of the employee's employment with Integricare.

- **Reportable Conduct:** The following conduct, whether or not a criminal proceeding in relation to the conduct has been commenced or concluded—
  - (a) a sexual offence
  - (b) sexual misconduct
  - (c) ill-treatment of a child
  - (d) neglect of a child
  - (e) an assault against a child
  - (f) an offence under section 43B or 316A of the Crimes Act 1900
  - (g) behaviour that causes significant emotional or psychological harm to a child.
- **Investigation:** the process of inquiry into, or examination of a reportable allegation or conviction undertaken by a relevant entity. The Office of the Children's Guardian also has the authority to conduct preliminary inquiries and investigations.

## GUIDING PRINCIPLES

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At Integricare we recognise the importance of the wellbeing and safety of all children and the significant lifelong impact that abuse can have on children. We are committed to being a child-safe organisation through:

1. Adopting and implementing the NSW Child Safe Standards (and/or National Principles for Child Safe Organisations).
2. Protecting the best interests of children and young people.

Ensuring all Integricare workers (paid and volunteer) undertaking child related work, This includes Integricare employees, child related contracted staff, students, and volunteers and board members are appropriately screened and comply with relevant legislation.

3. Ensuring processes and procedures aim to support children's safety and wellbeing across all areas of the organisation's work.
4. Identifying and managing risks to children in a professional and timely manner.

## THE POLICY PROCEDURE

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### Children's Participation

Integricare supports the active participation of children in the programs, activities, and services that we offer. We provide a range of ways to allow children to provide feedback or raise concerns. We listen to their views, respect what they say and involve them in decision making, especially in matters that directly affect them.

### Roles and Responsibilities

Detailed responsibilities are outlined in Integricare's Child Protection policy, Code of Conduct, Child Safe Code of Conduct and Complaints Management Policy & Procedures.

All Integricare employees must:

- Act in accordance with Integricare's Child Safe Code of Conduct
- Be aware of and comply with their responsibilities under the Child Safe Policy and Procedures

The Chief Executive Officer, as Head of Entity (HRE), is responsible for ensuring that systems and processes, policies and procedures, and codes of conduct are in place to prevent, detect and respond to abuse of young children using the services of the organisation.

The Child Safe Team is responsible for developing that systems and processes, policies and procedures, and codes of conduct to prevent, detect and respond to abuse of young children using the services of the organisation. The Child Safe Team is made of the SLT Children's Services rep and other Management delegates.

Service Support Managers will ensure that Integricare's Child Safe policies and procedures comply with relevant regulations and legislation. Policies and procedures will be updated every 3 years, or when required by change in legislation, and all employees and families of Integricare will be informed about this policy. This policy will be publicly available.

Managers will ensure that all employees understand their roles, responsibilities and behaviours expected to protect children and young people from abuse and neglect.

Additional responsibilities are outlined in Integricare's Child Safe Code of Conduct, Child Safe Responding and Reporting Obligations (including Mandatory Reporting) Policy and Procedures, and risk assessment register.

## **Recruitment**

Integricare will take all reasonable steps to ensure that it recruits the most appropriate people to work with children. Integricare's recruitment and selection processes are designed to reduce the risk of recruiting people who have a history of, or a tendency to abuse children.

Integricare's job advertisements, screening processes, interview processes, reference and police checks are all designed to demonstrate its commitment to child safety.

All Integricare employees in child related work are required to hold a valid Working with Children Check (WWCC). During the recruitment process all WWCCs are verified by the HR team. The verification notification is forwarded to the appropriate Manager, then filed on Ento with the applicant's other personal details. HR and the appropriate manager will check the notification result before progressing further through the recruitment process.

Management is responsible for the periodic review and maintenance of up-to-date records of employees' Working with Children Check, including the Working with Children Check number and the date on which each clearance expires. Once an employee provides their WWCC clearance, management will verify the clearance to ensure that it is valid and current. The WWCC will be placed in the individual's file and continue to be updated as required.

Working with children checks of all other employees such as contractors and volunteers must be verified by the Children's Services Team, Managers are required to keep a register and copy of verification documents at the service where the employee is carrying out their child related role.

## **Training, Support and Supervision**

Integricare recognises that continued education and training is essential to ensure that child safety is embedded into everything we do, and that all Integricare employees understand that child safety is everyone's responsibility.

All Integricare staff and volunteers are trained to identify, assess, and minimise risks of child abuse, and to detect potential signs of child abuse. Training occurs annually or more often as required.

New employees and volunteers receive training as part of induction. This includes an introduction and explanation about child safety with reference to the Child Safe Policy and the Child Safe Code of Conduct, which need to be signed by

all employees. Signed copies of these documents are kept with the employees' files on Ento or at the individual service for those employees not on payroll.

All new employees are supervised to ensure they understand Integricare's commitment to child safety, and that their behaviour towards children is safe and appropriate. As well, all employees involved in child-related work are regularly monitored and assessed and undertake regular performance reviews.

## Physical and Online Environments

Integricare ensures effective and adequate supervision is always provided with regulated staff ratios and that parents/carers in Community programs are informed of their supervision responsibilities. As a legislative requirement Integricare has a risk management system in place where hazards and risks are identified and managed to ensure a child safe environment.

Integricare has developed policies and Child Safe Code of Conduct to maintain a safe online environment for all children attending services.

## Reporting and responding to child safety concerns

Integricare takes all allegations, concerns, and complaints very seriously and has practices in place to investigate these thoroughly and quickly. All employees must comply with legal requirements and organisational procedures, and report known, suspected or alleged child abuse, misconduct, or inappropriate behaviour. When reporting an allegation, the processes outlined in Integricare's Child Protection Policy and Complaints and the Complaints Management Policy must be followed.

Integricare will work with children, families, and the community to ensure they know the organisational procedures to be able to raise concerns or complaints.

- 1- **Mandatory Reporting** - Mandatory reporting is the legislative requirement to report suspected child abuse and neglect to government authorities. In NSW, mandatory reporting is regulated by the [Children and Young Persons \(Care and Protection\) Act 1998](#). When Integricare employees have concerns that a child may be at risk, they are required to report their concerns to the NSW Department of Communities and Justice, through the Mandatory Reporters Guide.
- 2- **Reportable Conduct**- Under the NSW Children's Guardian Act 2019 Integricare has a duty to investigate and report on reportable allegations. The threshold for making a notification to the Office of the Children's Guardian is that a reportable allegation has been made. Once the HRE is made aware of a reportable allegation, Integricare must: notify the Office of the Children's Guardian within 7 business days and make any required reports; investigate the reportable allegation; and make a finding about the reportable allegation.
- 3- **Complaints Management** - Members of the public and employees may make a complaint about the conduct or policy non-compliance of anyone working within the scope of this policy. Integricare will: prioritise the safety and wellbeing of the child/children; respond to immediate risk or harm and mitigate against other unacceptable risks; meet all record keeping and reporting obligations to external authorities. If a complaint is made Integricare will follow the reporting procedures outlined in the Complaints Management and Child Protection Policies and make sure that the safety of the child is paramount.

When an allegation is received, Integricare needs to consider whether the employee should remain in their current position, be moved to another area, or be suspended. If DCJ and/or the police are involved, they will need to be consulted to ensure any action taken by Integricare will not interfere with their investigation.

- 4- **Report to the Board** – Any incident of a reportable allegation against an Integricare Employee will be reported to Integricare Board including details of investigation and outcomes. The CEO is responsible for informing the Chair of the Board within 24 hours of any incident of a reportable allegation. A report written report will be provided at

each board meeting by the Operations Managers of all incidents that are required to be reported to the Regulatory Authority.

## SCOPE

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This policy applies to management, staff, families, and visitors (including contractors). Child protection is a shared responsibility between the Board of Directors, its employees, contractors, volunteers, and parents/carers.

## POLICY NON-COMPLIANCE

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Actions taken as a result of policy non-compliance will depend on any consequential negative impact caused by the non-compliance. As a guide, it will be at the discretion of senior management to determine the level of adverse impact on Integricare i.e.:

- Catastrophic Impact could lead to Instant dismissal
- Very High Impact - A written warning and grounds for dismissal could apply.
- High Impact - A written warning, recorded in the employee's HR file in GSO.
- Low Impact - A verbal warning given by the line manager.
- Minimal Impact - A reminder of the policy by the line manager.

## INTEGRICARE RELATED POLICIES AND PROCEDURES

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- Child Protection Policy
- Code of Conduct
- Child Safe Code of Conduct
- Privacy and Confidentiality Policy
- Child Safe Complaints Management
- Supervision
- Nappy Change and toileting
- Health and Safety
- Incident, Injury and Trauma
- Mobile Phone
- Cyber Safety

## LEGISLATION AND SOURCES:

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- Australian Children's Education & Care Quality Authority. (2014).
- Guide to the Education and Care Services National Law and the Education and Care Services National Regulations. (2017).
- Guide to the National Quality Standard. (2020)
- Revised National Quality Standard. (2018).
- United Nations Convention on the Rights of the Child (1990)
- NSW Mandatory Reporters Guide
- Child Protection (Working with Children) Act 2012
- Children and young Persons (Care and Protection) Act 1998
- National Principles for Child Safe Organisations – The National Office for Child Safety
- Children's Guardian Act 2019