



# CHILD SAFE POLICY

Our commitment to child safety within the Organisation

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## 1- STATEMENT OF COMMITMENT

Integricare Limited (Integricare) and its Board of Directors are committed to the safety and wellbeing of all children and creating and maintaining a Child Safe Organisation.

### **Integricare's commitment:**

- The safety and wellbeing of children will always be our first priority.
- We are committed to the safety, participation and empowerment of all children.
- We have zero tolerance of any child abuse, and all allegations and safety concerns will be treated very seriously and in line with our policies and procedures.
- We strive to create a culture of child safety that reduces the opportunity for harm and gives staff a clear process to follow when someone raises concerns about child safety or reports abuse.
- We have thorough human resources, recruitment and screening practices for all employees, volunteers and contractors to protect children from harm
- We are committed to the regular training and education of our board, employees and volunteers on child safe practices
- We support and respect all children, families, staff, stakeholders and volunteers work to ensure all parties understand that child safety is a community responsibility and that we work together to fulfil our legal and moral obligations.
- We value and support diversity, inclusion and equality of all children. In accordance with the Child Safe Standards, we particularly support the participation, empowerment and cultural safety of Indigenous children, children from culturally and linguistically diverse backgrounds and children with a disability.
- We have specific policies, procedures and training in place that support our board members, employees and volunteers to achieve these commitments.

## 2- CHILD SAFE POLICY

### 2.1 POLICY PURPOSE

Integricare is committed to providing a safe and inclusive 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 ensure the welfare and wellbeing of all children are upheld.

### 2.2 SCOPE

Children's safety and the prevention of harm is a shared responsibility between the Board of Directors, management, staff, families and visitors (including contractors). This policy will be communicated to every person to whom it applies and will be made accessible for all interested parties to view.

### 2.3 GUIDING PRINCIPLES

At Integricare we recognise the importance of the wellbeing and safety of all children and the significant lifelong impact that abuse and/or harm 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.
3. 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.
4. Ensuring processes, procedures and training aim to support children's safety and wellbeing across all areas of our work.
5. Identifying and managing risks to children in a professional and timely manner.

### 2.4 DEFINITIONS

**For the purposes of this policy:**

- Head of Relevant Entity (HRE): This is defined as the Chief Executive Officer (CEO) 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 - 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 or Board Committee
- **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.

## 2.5 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.

*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 CEO will be supported by the Mission and Excellence in Learning and Care Committee (MELC).

*The MELC* is also responsible for developing 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.

*Chief Operating Officer and Operations Managers* will ensure that Integricare’s Child Safe policies and procedures comply with relevant regulations and legislation. They also provide leadership in building, maintaining, and promoting a child safe culture.

*Centre/Service Managers* will ensure that all employees understand their roles, responsibilities and behaviours expected to protect children and young people from abuse and neglect and that all relevant policies, procedures and training are implemented in their service.

*All Integricare employees will;*

- Support Integricare’s commitment to promote safety, well-being and positive outcomes for all children and families.
- Understand the requirements of this Policy and apply it in all aspects of their role.
- Raise and/or escalate risk concerns and/or behaviours that are contrary to this Policy as soon as possible in line with reporting policies and procedures.
- Act in accordance with Integricare’s Child Safe Code of Conduct.

## 2.6 CHILDRENS PARTICIPATION

Integricare recognises and embeds a child-rights approach in that we 'recognise, respect and protect the human rights of children and young people in the development and implementation of laws, policies, practices and other decisions affecting them'. These rights are set out in the Convention on the Rights of the Child; the core tenets of child rights are contained in Articles 2, 3, 6 and 12. 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 on their experience at the service or raise concerns. We listen to their views and opinions, respect what they say and involve them in decision making, especially in matters that directly affect them. Staff work with children to give them tools to be able to better understand their feelings.

## **2.7 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, interview processes and references checking are all designed to demonstrate our 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 the Payroll/HR platform with the applicant's other personal details. Service Managers are responsible for the periodic review and maintenance of up-to-date records of employees' WWCC's, including the 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.

The WWCC of all other employees such as contractors and volunteers must be verified by the Service Managers who are required to keep a register and copy of verification documents at the service where the employee is carrying out their child-related role. WWCC of GSO employees are held by HR who ensure currency.

## **2.8 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 are trained to identify, assess, and minimise risks of child abuse, and to detect potential signs of child abuse. To ensure best practice, all service staff will attend approved child protection training certified by a registered training organization. Staff will continue to maintain current knowledge of child protection and mandatory reporter requirements by completing Child Protection Awareness Training annually. Staff are expected to maintain a valid child protection qualification aligned with the appropriate coding requirements. In the event of any changes to the status of their qualification, including RTO cancellation, they must promptly notify the Approved Provider or their representative.

New employees and volunteers receive child safe training as part of induction. This includes an introduction and explanation about child safety with reference to the Child Safe Policy, Child Safe Code of Conduct and Child Safe Standards which need to be signed by all employees and kept on file. 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. All employees involved in child-related work are regularly monitored and assessed and undertake regular performance reviews.

## **2.9 PHYSICAL AND ONLINE ENVIRONMENT**

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

## 2.10 REPORTING AND RESPONDING TO CHILD SAFE 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 Management Policy must be followed.

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

- In an emergency, where there are urgent concerns for the child's health or life, call the police using the emergency line [000](#)
- Any member of the community, including mandatory reporters, who suspect, on reasonable grounds, that a child or young person is at risk of significant harm should report their concerns to the Child Protection Helpline. Mandatory reporters and non-mandatory reporters, including the general public, should phone [13 21 11](#)
- 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 or are at risk they are required to report their concerns to the NSW Department of Communities and Justice, through the Mandatory Reporters Guide.
- Reportable Conduct- Under the NSW Children's Guardian Act 2019 Integricare has a duty to investigate and report on reportable allegations. Under the legislation, Integricare must investigate allegations of such conduct to make an informed finding as to whether or not the conduct occurred. Once the CEO is made aware of a reportable allegation, Integricare must: notify the Office of the Children's Guardian within 24 hours and make any required reports; investigate the reportable allegation; and make a finding about the reportable allegation.
- 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.
- Report to the Board – Any incident of a reportable allegation against an Integricare Employee will be reported to the Integricare Board including details of investigation and outcomes. The CEO is responsible for informing the Chair of the Board of any incident of a reportable allegation.

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 the Department of Communities and Justice 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.

## 2.11 POLICY REVIEW AND DISTRIBUTION

This policy will be updated annually or when required by changes in legislation. All employees and families of Integricare will be informed about this policy. This policy will be made publicly available including on Integricare's website.

## 2.12 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.

## 3- INTEGRICARE RELATED POLICIES AND PROCEDURES

- PC28-04 Child Protection Policy
- PO40-01.1 Code of Conduct (Employees) Policy
- PC60-01 Confidentiality and Privacy Policy
- PO11-01 Cyber Safety Policy
- PC03-03 Dealing with Complaints Policy
- PO23-03 Mobile Phones Policy
- PO25-05 Recruitment Policy
- Respect for Children Policy
- PO32-02 Whistleblower Policy
- Work Health and Safety Policy

## 4- LEGISLATION AND SOURCES

- 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's Guardian Act 2019
- Child Protection (Working with Children) Regulation 2013
- Children and Young Persons (Care and Protection) Act 1998
- Crimes Act 1900
- Children and Young Persons (Care and Protection) Regulation 2012
- Children and Young Persons (Care and Protection) (Child Employment) Regulation 2015
- Disability Inclusion Act 2014
- Anti-Discrimination Act 1977 Standards may include:
- Child Safe Standards

## Appendix 1

### CHILD SAFE CODE OF CONDUCT

We are committed to the safety and well-being of children and young people. We recognise the importance of and responsibility for ensuring our organisation provides a safe and supportive environment that respects and fosters the rights and well-being of children in our care. As a Board member, employee, contractor or volunteer, you are responsible for the safety of children in our services.

#### **I will:**

- adhere to all relevant Australian and NSW legislation and our Child Protection Policy at all times, and take all reasonable steps to protect children from abuse and harm
- understand that child safety is everyone's responsibility
- respect the privacy of children and their families by keeping all information about child protection concerns confidential
- treat children with respect and be a positive role model in my conduct with them
- ensure I have a valid and current Working with Children Check (WWCC) which has been verified by Integricare
- uphold the rights of children and always prioritise their needs
- promote the safety of children and take all reasonable steps to protect children from abuse
- adhere to Integricare's guidelines for the use of social media as outlined in the *Social Media Policy*
- communicate with the children in an age appropriate and realistic manner
- set clear boundaries about appropriate behaviour between myself and a child
- only have physical contact with a child in ways which are appropriate to my professional or agreed role and responsibilities
- be willing to listen and respond appropriately to a child's views and concerns
- respond quickly, fairly, and transparently to any serious complaints made by a child or related to a child
- understand and abide by my reporting obligations as a Mandatory Reporter.

#### **I will not:**

- condone or participate in illegal, unsafe, or abusive behaviour towards children, including physical, sexual, or psychological abuse, ill-treatment, neglect, or grooming
- exaggerate or trivialise child abuse issues
- fail to report information to the CEO (or their delegate) if I know a child has been abused
- engage in unwarranted and inappropriate touching involving a child
- persistently criticise and/or denigrate a child
- verbally assault a child or create a climate of fear
- encourage a child to communicate with me in a private setting
- share details of sexual experiences with a child
- use sexual language or gestures in the presence of children
- discriminate against any child, because of culture, race, ethnicity, or disability
- put children at risk of abuse by refusing food or play, making threats, exposing children to inappropriate language or material (movies, internet, photos)
- use my personal mobile phone (camera) to take photos of children as this is a breach of children's privacy (service mobile phones or iPads may be used if it is for the purposes of 'observations' etc.)
- give children access to my personal mobile phone, including content and images on the phone
- use tobacco products or possess or be under the influence of alcohol or illegal drugs at any time while working with children
- develop any 'special' relationships with children that could be seen as grooming/favouritism such as the offering of gifts or special treatment
- do things of a personal nature that a child can do for themselves, such as toileting or changing clothes.

All staff, volunteers, families and community members are encouraged to speak up if they have concerns about the safety of children.

Some breaches of this Code of Conduct may need to be reported to the NSW Police, the Department of Communities and Justice and the Office of the Children's Guardian. Our Complaint Handling Policy provides more information about our reporting obligations to external authorities as well as describing protections and confidentiality provisions for anyone making a report.

Staff and volunteers who breach our Code of Conduct may also be subject to disciplinary action. This can include increased supervision, appointment to an alternative role, suspension or termination from the organisation.

## CODE OF CONDUCT POLICY AGREEMENT

|                                                                                                                                                                                                                  |  |           |  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|-----------|--|
| I have read and understood Integricare's <i>Code of Conduct</i> and agree to abide by the provisions set out in the Code of Conduct at all times. Failure to do so may lead to disciplinary action or dismissal. |  |           |  |
| NAME                                                                                                                                                                                                             |  | SIGNATURE |  |
| POSITION                                                                                                                                                                                                         |  | DATE      |  |

## Appendix 2 - Child Safe Standards

| Standard                                                                                           | Core Components                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| <b>Standard 1</b><br>Child safety is embedded in organisational leadership, governance and culture | <ul style="list-style-type: none"> <li>• The organisation publicly commits to child safety and leaders champion a child safe culture.</li> <li>• Child safety is a shared responsibility at all levels of the organisation.</li> <li>• Risk management strategies focus on preventing, identifying and mitigating risks to children.</li> <li>• Staff and volunteers comply with a code of conduct that sets clear behavioural standards towards children.</li> <li>• Staff and volunteers understand their obligations on information sharing and record keeping.</li> </ul> |
| <b>Standard 2</b><br>Children participate in decisions affecting them and are taken seriously      | <ul style="list-style-type: none"> <li>• Children are able to express their views and are provided opportunities to participate in decisions that affect their lives.</li> <li>• The importance of friendships is recognised and support from peers is encouraged, helping children feel safe and less isolated.</li> <li>• Children can access abuse prevention programs and information.</li> <li>• Staff and volunteers are attuned to signs of harm and facilitate child friendly ways for children to communicate and raise their concerns.</li> </ul>                   |
| <b>Standard 3</b><br>Families and communities are informed and involved                            | <ul style="list-style-type: none"> <li>• Families have the primary responsibility for the upbringing and development of their child and participate in decisions affecting their child.</li> <li>• The organisation engages in open, two-way communication with families and communities about its child safety approach and relevant information is accessible.</li> <li>• Families and communities have a say in the organisation's policies and practices.</li> <li>• Families and communities are informed about the organisation's operations and governance</li> </ul>  |
| <b>Standard 4</b><br>Equity is upheld and diverse needs are taken into account                     | <ul style="list-style-type: none"> <li>• The organisation actively anticipates children's diverse circumstances and responds effectively to those with additional vulnerabilities.</li> <li>• All children have access to information, support and complaints processes.</li> <li>• The organisation pays particular attention to the needs of Aboriginal children, children with disabilities, and children from culturally and linguistically diverse backgrounds</li> </ul>                                                                                                |
| <b>Standard 5</b><br>People working with children are suitable and supported                       | <ul style="list-style-type: none"> <li>• Recruitment, including advertising and screening, emphasises child safety.</li> <li>• Relevant staff and volunteers have WWCCs.</li> <li>• All staff and volunteers receive an appropriate induction and are aware of their child safety responsibilities, including reporting obligations.</li> <li>• Supervision and people management have a child safety focus.</li> </ul>                                                                                                                                                       |

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| <b>Standard 6</b><br>Processes to respond to complaints of child sexual abuse are child focused                                                 | <ul style="list-style-type: none"> <li>• The organisation has a child-focused complaint-handling system that is understood by children, staff, volunteers and families.</li> <li>• The organisation has an effective complaint-handling policy and procedure which clearly outline roles and responsibilities, approaches to dealing with different types of complaints and obligations to act and report.</li> <li>• Complaints are taken seriously, responded to promptly and thoroughly, and reporting, privacy and employment law obligations are met.</li> </ul> |
| <b>Standard 7</b><br>Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training | <ul style="list-style-type: none"> <li>• Relevant staff and volunteers receive training on nature and indicators of child maltreatment, particularly organisational child abuse.</li> <li>• Staff and volunteers receive training on the organisation's child safe practices and child protection.</li> <li>• Relevant staff and volunteers are supported to develop practical skills in protecting children and responding to disclosures</li> </ul>                                                                                                                 |
| <b>Standard 8</b><br>Physical and online environments minimise the opportunity for abuse to occur                                               | <ul style="list-style-type: none"> <li>• Risks in the online and physical environments are identified and mitigated without compromising a child's right to privacy and healthy development.</li> <li>• The online environment is used in accordance with the organisation's code of conduct and relevant policies.</li> </ul>                                                                                                                                                                                                                                        |
| <b>Standard 9</b><br>Implementation of the Child Safe Standards is continuously reviewed and improved                                           | <ul style="list-style-type: none"> <li>• The organisation regularly reviews and improves child safe practices.</li> <li>• The organisation analyses complaints to identify causes and systemic failures to inform continuous improvement.</li> </ul>                                                                                                                                                                                                                                                                                                                  |
| <b>Standard 10</b><br>Policies and procedures document how the organisation is child safe                                                       | <ul style="list-style-type: none"> <li>• Policies and procedures address all NSW Child Safe Standards.</li> <li>• Policies and procedures are accessible and easy to understand.</li> <li>• Best practice models and stakeholder consultation inform the development of policies and procedures.</li> <li>• Leaders champion and model compliance with policies and procedures.</li> <li>• Staff understand and implement the related policies and procedures.</li> </ul>                                                                                             |