Child Safe Policy

July 2024

Authorisation

Authorised by	Authorisation date	Effective date	Next Review
Peter Saccasan	2 August 2024	2 August 2024	2 August 2025

Table of Contents

1   Purpose

Education Development Association (EDA) is committed to providing a safe, supportive and caring environment that enables children and young people to develop to their full potential as individuals.

The Child Safe Policy (the Policy) is a demonstration of EDA's commitment to protecting children and young people from all forms of abuse and harm. The Policy aims to:

- Create a safe environment for children when they engage in EDA activities.
- Promote the health, safety and welfare of the children involved in EDA activities.
- Clearly outline EDA's approach to child safety.
- Ensure Officers, Principals, Leaders, and Helpers understand their professional and legal responsibilities relating to child safety.
- Embed the Child Safe Standards and the National Principles throughout EDA's leadership, governance and culture.

2   Scope

The Policy applies to staff and third parties engaged by EDA. The Policy extends to all aspects of educational activities and programs of EDA, including those delivered in the physical and online environments.

3   Terms and Definitions

For the purposes of the Policy:

Term	Meaning
CALD	Culturally and Linguistically Diverse.
Centre	Refers to a study centre established by EDA in which its educational activities are conducted.
Child	A person under the age of 18 years, unless under the law applicable to the child, majority is attained earlier.
Child abuse	Refers to the acts or omissions (neglect) that result in, or have the likelihood to result in, harm to a child. The forms of child abuse are sexual abuse, emotional abuse, neglect, physical abuse, and exposure to family violence.
Child Safe Organisation	Refers to an organisation that consciously and systematically creates conditions that reduce the likelihood of harm to children. It creates conditions that increase the likelihood of identifying and reporting harm and responds appropriately to disclosures, allegations, or suspicions of harm.
Child Safety Officer (CSO)	Refers to the individual appointed by EDA who is responsible for matters relating to child safety, including the management of child safety complaints.
EDA	Education Development Association.

Employee	Refers to an individual in a paid position at EDA.
Helper	Refers to a person invited to help from time to time in a particular activity at a Centre. A helper may be a person under 18 years or over 18 years of age.
Leader	An adult who has an ongoing role in the provision of services in a Centre.
The National Child Safe Standards	The Standards encompass 10 key elements that create a Child Safe Organisation. The Standards provide clear guidance for organisations to create cultures and adopt strategies to put the interests of children first, to keep them safe from harm.
The National Principles	The National Principles for Child Safe Organisations ('the National Principles') aim to provide a nationally consistent approach to creating child safe organisations. The National Principles reflect the 10 Child Safe Standards and cover all forms of abuse.
Officer	Has the same meaning given by the *Corporations Act 2001* (Cth) and includes a director or secretary of EDA.
Principal	A person appointed by EDA to direct activities at a Centre.
Resident	Refers to an individual that resides at a Centre and may be engaged to volunteer in child-related activities at EDA.
Staff	Refers to an individual in a paid (employee) or unpaid (volunteer) position at EDA.
Third parties	Refers to individuals who are associated with or carry out work for EDA including but not limited to, contractors and sub-contractors.
Victorian Child Safe Standards	Refers to the mandatory framework in Victoria that requires child-related organisations to implement policies and strategies to protect children from abuse. In Victoria, there are 11 Child Safe Standards.
Volunteer	Refers to an individual in an unpaid position at EDA. This includes EDA Officers, Leaders and Helpers, and may include Principals and Residents. It also includes other individuals engaged by EDA on a voluntary basis.
Working with Children Check (WWCC)	Refers to the legislative requirement for individuals to obtain a WWCC (or equivalent) as applicable in any relevant State or Territory.

4   The Child Safe Standards and the National Principles

The Policy reflects EDA's commitment to embedding the Child Safe Standards and the National Principles throughout its operations.

Each State and Territory government is responsible for implementing legislation to embed and monitor compliance of the Child Safe Standards and/or the National Principles. Refer to **Appendix A** for guidance on State/Territory regulatory frameworks relevant to EDA's Centre locations.

5 Statement of Commitment to being a Child Safe Organisation

EDA has zero tolerance for all forms of child abuse. EDA is committed to being a Child Safe Organisation, and embedding child safety into everyday practices by:

- Promoting the rights of children, including their right to express their views and participate in decisions that impact their lives.

- Communicating child safety information to all relevant stakeholders, including staff, children, and their families.

- Acknowledging and respecting the diverse needs of First Nations children, children from CALD backgrounds, and children with a disability.

- Adopting robust child safe recruitment and screening processes to ensure individuals engaged by EDA are suitable to work with children.

- Escalating and reporting child safety complaints to the relevant external authorities (where required) and in accordance with EDA's *Child Safe Complaints Handling Procedure*.

- Providing regular child safe training and education to EDA staff to build their capacity to prevent child abuse and keep children safe.

- Ensuring staff are aware of and understand:
  - Their child safe responsibilities and legal reporting obligations
  - EDA's child safe policies and procedures, including behavioural expectations in accordance with EDA's *Child Safe Code of Conduct.*

- Identifying child abuse risks and adopting a situational prevention approach to mitigate risks across EDA's activities and programs.

- Continually improving child safe policies, procedures, and practices through regular child safe audits, policy reviews and analysis following any child safety complaint or concern.

6 Child and Youth Participation and Empowerment

EDA is committed to providing an environment where children feel comfortable and safe to raise their concerns. EDA empowers children and promotes their participation by:

- Providing children with age-appropriate information about EDA's child safety approach including:
  - Children's rights to speak up
  - Appropriate and inappropriate behaviours
  - How to raise safety concerns at EDA

- Ensuring staff receive ongoing training and education on how to empower children and promote their participation

- Delivering programs and activities that are suitable to the age, development, capability and understanding of the children involved.

- Supporting children to develop and sustain friendships through EDA's programs and activities which are designed to promote teamwork.

7 Engaging with Families

EDA works in partnership with parents and guardians to ensure they feel confident that their child is safe whilst participating in EDA's activities and programs. EDA is committed to:

- Involving parents and guardians in decisions relating to their child's participation at EDA

- Providing parents and guardians with access to EDA's child safe policies and procedures

- Ensuring parents and guardians have regular opportunities to provide feedback to EDA about its activities, programs and child safety approach

- Ensuring parents and guardians know who to speak to if they have a concern relating to child safety.

8 Diversity and Inclusion

EDA takes into account children's diverse circumstances and recognises that some children are more vulnerable to abuse than others. EDA is committed to protecting the safety of all children, including First Nations children, children from CALD backgrounds and children with a disability, by:

- Providing information about EDA's child safety approach in accessible and age-appropriate formats for all children and families

- Tailoring programs and activities to be appropriate for children from specific cultural groups and/or children with a disability to promote equal participation

- Encouraging and supporting children to express their culture and enjoy their cultural rights

- Providing staff with ongoing child safe training and education on cultural safety and how to cater to the diverse needs of children

- Accessing external expert advice when required, such as cultural advice or disability support.

9 Recruitment and Screening

EDA adopts robust recruitment, screening, and induction processes to ensure the most suitable individuals are engaged to work / volunteer with children. Refer to EDA's *Child Safe Recruitment Procedure* for guidance.

10 Complaints Handling

EDA takes all complaints relating to the safety of children seriously and responds promptly in accordance with EDA's *Child Safe Complaints Handling Procedure.* The Procedure provides detailed guidance on the child safe complaints process and the State/Territory legal reporting requirements for key areas including:

- Mandatory reporting
- Reportable conduct
- Failure to Report/Disclose offence
- Failure to Protect offence
- Duty to prevent child abuse
- Allegations made against EDA staff.

11   Risk Management

EDA recognises the importance of identifying, assessing, and managing risks of child abuse and harm in both the physical and online environments. For a comprehensive guide to EDA's child safe risk management approach, please refer to the *Child Safe Risk Management Procedure*.

12   Responsibilities

Parties or Persons	Responsibilities
All Staff	All staff are responsible for: - Complying with the Policy and the *Child Safe Code of Conduct* - Completing child safe training at induction and on an ongoing basis - Maintaining a valid WWCC clearance or equivalent - Identifying and managing child safety risks in their areas of responsibility - Raising child safety concerns in accordance with EDA's *Child Safe Complaints Handling Procedure* - Reporting child safety concerns to the relevant authorities in accordance with legislative reporting obligations.
Officers *(EDA Board Members)*	EDA Officers are responsible for: - Implementing EDA's child safe policies and procedures - Ensuring compliance with child safety legal obligations - Communicating EDA's values and child safety approach to all stakeholders - Employing and appointing suitable individuals to the role of Principal at each Centre - Ensuring child safety complaints are managed and escalated in accordance with EDA's *Child Safe Complaints Handling Procedure* - Providing ongoing support to the CSO - Implementing a comprehensive risk management framework that minimises risks of abuse to children

	- Leading continuous improvement and conducting a regular review of the Policy in accordance with legislative changes and/or regulatory updates.
Safeguarding Committee	The Safeguarding Committee is responsible for: - Reporting to EDA's Board on child safety matters - Monitoring child safety legislative and regulatory updates - Supporting the CSO in meeting their child safe responsibilities - Assisting the CSO to organise and/or deliver child safety training to staff - Overseeing the investigation process into child safety complaints.
Child Safety Officer (CSO) / Contact Person	The CSO is responsible for: - Leading the implementation of EDA's child safety framework - Providing child safety information and advice to staff, children, and families - Organising and/or delivering child safety training to staff - Monitoring and recording staff completion of child safe training - Supporting Principals to implement EDA's child safe policies and procedures at the Centres - Maintaining EDA's centralised WWCC register, in accordance with legislative requirements - Responding to and managing child safety complaints - Escalating child safety complaints, in accordance with the *Child Safe Complaints Handling Procedure* - Leading investigations into child safety complaints, including reported breaches of EDA's child safe policies and procedures - Providing support to anyone (child, parent, or individual) who reports a child safety matter

	• Communicating with affected parties involved in a complaint.
Principals *(Study Centre Directors)*	Principals are responsible for: • Maintaining a duty of care towards all children participating in EDA activities and programs • Modelling appropriate standards of behaviour in accordance with the *Child Safe Code of Conduct* • Ensuring suitable individuals are engaged to the roles of Leader/Helper at the Centre in accordance with the *Child Safe Recruitment Procedure* • Supporting Leaders/Helpers to understand the requirements of the Policy and supporting procedures • Fostering an open culture which supports Leaders/Helpers to disclose child safety concerns • Verifying the WWCC clearances of Leaders/ Helpers, and third parties if engaged at the Centre • Providing the CSO with the WWCC clearance and verification information of all Leaders/Helpers engaged at their Centre • Escalating child safety complaints in accordance with EDA's *Child Safe Complaints Handling Procedure* • Completing risk assessments in accordance with EDA's *Child Safe Risk Management Procedure* • Ensuring the Centre is compliant with its record keeping responsibilities in accordance with S*ection 14* of the Policy.
Leaders and Helpers	Leaders and Helpers are responsible for: • Maintaining a duty of care towards all children participating in EDA activities and programs • Supervising children under their care at all times • Seeking advice from the relevant Principal if they do not understand any aspect of the Policy or supporting procedures • Remaining vigilant to the possible signs of abuse in children • Raising any concerns they have with the relevant Principal.
Contractors / Third parties	Contractors and third parties are responsible for: • Complying with EDA's child safe policies and procedures • Maintaining a current WWCC clearance (or equivalent) if required by law.

13　Confidentiality

EDA recognises the sensitive nature of reporting and responding to child abuse. Officers ensure access to confidential records is strictly controlled. EDA keeps information about complaints confidential, except where it is necessary to:

- Uphold its duty of care to protect children from harm
- Ensure relevant parties are appropriately informed throughout a complaints process
- Comply with relevant legislation which requires EDA to share information with the Police or other prescribed bodies.

14　Record Keeping

EDA keeps complete and accurate physical and/or digital records of all serious child abuse matters for a period of **40 years.** All other documents are retained for a minimum of **7 years.** EDA ensures that all records are:

- Maintained appropriately in a clear, logical and secure manner
- Dealt with in accordance with the relevant law such as the *Privacy Act 1988* (Cth)
- Secure from unauthorised access
- Stored securely in a locked filing cabinet (physical records)
- Stored in a password-protected file (digital records)
- Preserved in a suitable physical and/or digital environment where records are not subject to degradation, loss, alteration, corruption or deletion
- Available for individuals who have a right to access records which contain their personal information.

15　CCTV and Surveillance

Where utilised, EDA adopts the following Best Practice principles in relation to access, storage and use of CCTV:

- CCTV devices are installed for authorised purposes only. Devices are not installed in areas which have view into bathrooms, changing areas or other private spaces.
- CCTV devices are made clearly visible with signage displayed on the premises indicating that CCTV devices are in operation.
- CCTV footage is stored securely with antivirus and internet security software installed and maintained.
- CCTV footage is stored for a minimum of 30 days. If there is an incident, footage is stored for an additional period of time for the purpose of police investigation.
- Personal information obtained through CCTV is stored in accordance with the *Privacy Act 1988* (Cth). Any personal information recorded through CCTV is destroyed and/or de-identified when it is no longer needed.
- Only authorised persons have access to view CCTV footage. Multiple access controls are in place such as, password and authorisation codes.
- Access to and release of CCTV footage is for authorised purposes only, e.g. for police investigation purposes.

16   Breach of the Policy and Supporting Procedures

EDA responds promptly to all breaches of the Policy. The response will be managed in a fair, unbiased, and supportive manner. Depending on the nature of the breach, EDA may:

- Conduct mediation between the parties involved (where appropriate)
- Take disciplinary action, including but not limited to the suspension or termination of an individual's engagement with EDA
- Restrict a person's duties or involvement, if the person involved in the breach was carrying out work or volunteering at EDA
- Provide specific education and training with emphasis on the relevant component of the Policy that was the subject of the breach
- Providing closer supervision to a staff member
- Review current policies and procedures and make updates if necessary.

The details of the breach will be documented, recorded, and kept confidential in accordance with the confidentiality and record keeping requirements outlined in the Policy.

17   Policy Review

The Policy will be reviewed annually, or earlier as required in accordance with legislative and/or regulatory updates.

EDA is committed to promoting the participation of parents and children in the development of the Policy. Each Centre makes the Policy available to parents and encourages their feedback and/or suggestions to improve the Policy. Suggestions are taken seriously and considered by EDA.

18   Related Policies and Procedures

The Policy should be read in conjunction with the following related EDA documents:

- *Child Safe Code of Conduct*
- *Child Safe Complaints Handling Procedure*
- *Child Safe Recruitment Procedure*
- *Child Safe Risk Management Procedure*

19   Relevant Legislation

- *Child and Youth Safe Organisations Act 2023* (Tas)
- *Child Protection Act 1999* (Qld)
- *Child Protection (Working with Children) Act 2012* (NSW)
- *Child Protection (Working with Children) Regulation 2013* (NSW)
- *Child Protection Regulation 2011* (Qld)
- Child Safe Organisations Bill 2024 (QLD)
- *Child Wellbeing and Safety Act 2005* (Vic)
- *Child Wellbeing and Safety Regulations* (Vic)
- *Children and Young Persons (Care and Protection) Act 1998* (NSW)
- *Children and Young Persons (Care and Protection) Regulation 2012* (NSW)
- *Children's Guardian Act 2019* (NSW)
- *Civil Liability Act 2002* (NSW)
- *Crimes Act 1900* (NSW)
- *Crimes Act 1958* (Vic)
- *Criminal Code Act 1899* (QLD)
- *Privacy Act 1988* (Cth)
- *Worker Screening Act 2020* (Vic)
- *Working with Children (Screening) Act 2004* (WA)
- *Working with Vulnerable People (Background Checking) Act 2011* (ACT)

20   Version History

Version.	Approved by	Approval date	Effective date	Change Details

Appendix A – State Regulatory Frameworks

NSW	
Legislation	*Children's Guardian Act 2019* (NSW)
Framework	NSW 10 Child Safe Standards
Regulator	Office of Children's Guardian (OCG)
Further Information	• [Why we have Child Safe Standards	Office of the Children's Guardian (nsw.gov.au)](#) • [Implementing the Child Safe Standards	Office of the Children's Guardian (nsw.gov.au)](#) • [How to meet the Standards	Office of the Children's Guardian (nsw.gov.au)](#)

Queensland	
Legislation	Child Safe Organisations Bill 2024 (Qld) – *pending*
Framework	Child Safe Standards *(based on the National Principles)*
Regulator	Queensland Family and Child Commission
Further Information	• [Growing child safe organisations	Community support	Queensland Government (www.qld.gov.au)](#) • [Child Safe Organisations Bill 2024 - Queensland Legislation - Queensland Government](#)

Victoria	
Legislation	*Child Safety and Wellbeing Act 2005* (Vic)
Framework	Victorian 11 Child Safe Standards
Regulator	Commission for Children and Young People (CCYP)
Further Information	• [CCYP	The 11 Child Safe Standards](#) • [CCYP	Being a child safe organisation](#) • [CCYP	Resources and support for the Child Safe Standards](#)

Tasmania	
Legislation	*Child and Youth Safe Organisations Act 2023* (Tas)
Framework	Tasmania's Child and Youth Safe Standards *(based on the National Principles)*
Regulator	Independent Regulator, reports to the Tasmanian Government
Further Information	• [Child and Youth Safe Standards	carcru (justice.tas.gov.au)](#) • [Introducing Tasmania's Child and Youth Safe Organisations Framework (2023) (justice.tas.gov.au)](#)

Appendix B – Identifying the Forms and Possible Signs of Abuse

Child abuse refers to acts or omissions (neglect) that result in, or have the likelihood to result in, harm to a child. There are two different signs of abuse, physical and behavioural. A person should not assess individual signs in isolation, rather signs should be looked at in the context of other potential signs and the personal circumstances or history of the child.

- **Physical signs** are the injuries / visible harms that may occur as a result of abuse.
- **Behavioural signs** are the actions, attitudes, and emotions of a child that indicate abuse may have occurred.

The signs of abuse noted below are not exhaustive. The presence of these signs does not necessarily mean that abuse has been, or is, occurring.

Physical Abuse

Refers to the use of deliberate physical force against a child that intentionally or unintentionally results, or has the likelihood of resulting, in harm.

Physical signs	Behavioural signs
- Bruising - Fractured bones - Burns / scalds - Lacerations and welts - Sprains and dislocations.	- Covering up injuries - Fear of adults - Unable to explain an injury - Being aggressive towards others - Avoiding physical contact.

Emotional/Psychological Abuse

Refers to inappropriate verbal or symbolic acts by an adult towards a child and/or a pattern of failure over time to provide a child with adequate non-physical nurturing and emotional availability.

Physical signs	Behavioural signs
- Physical development is delayed - Delayed speech - Bed-wetting beyond usual age - Extreme weight loss - Signs of self-harm.	- Overly compliant behaviour - High levels of anxiety or depression - Avoids interaction with other children - Demonstrating low self-esteem - Lack of trust in people - Extreme attention seeking behaviour.

Sexual Abuse

Refers to when a person exposes a child to, or involves a child in, sexual activity that the child does not fully comprehend, the child is unable to give informed consent to, the child is not developmentally prepared for and that is contrary to acceptable community standards.

Physical signs	Behavioural signs
- Pain or bleeding in anal or genital areas - Bruises and/or bite marks to breasts, buttocks, lower abdomen - Difficulty walking or sitting - Unexplained pain in genital area - Bed-wetting beyond usual age.	- Children describing sexual acts - Sexual behaviour beyond healthy development - Self-destructive behaviour - Withdrawn behaviour - Regression in development.

Child Grooming

Child grooming is a form of sexual abuse. It refers to actions deliberately undertaken with the aim of befriending and establishing an emotional connection with a child, to lower the child's inhibitions in preparation for sexual activity with the child.

Possible Grooming strategies
• Using favouritism, bribes and/or giving gifts to a child • Spending inappropriate one-on-one time with a child • Actively isolating children from other adults or children • Violating personal boundaries in the context of intimate care. This includes bathing, toileting and changing clothes. • Insisting on physical affection with a child such as hugging, kissing, tickling even when a child does not appear to want it. • Communicating privately with a child via social media • Forming relationships with parents, guardians, and family members of children in order to build trust and ease their ability to access the child.

Neglect

Refers to the failure to provide a child with conditions that are culturally accepted as being essential for their physical and emotional development and wellbeing, such as food, clothing, shelter, hygiene, medical attention, or adequate supervision. Neglectful behaviours are an act of omission, or by wilful choice.

Physical signs	Behavioural signs
• Low weight for age • Poor standards of hygiene • Untreated physical problems • Poor complexion.	• Stealing food • Indiscriminately seeks out adult affection • Being constantly tired • Frequently late or absent • Being withdrawn.

Exposure to Family Violence

Refers to any form of abusive behaviour by a person towards another family member. The abuse can be physical, sexual, emotional, psychological, economical, threatening, or coercive type behaviour. It is also a form of abuse when a child is exposed to, hears or witnesses any of the effects of the abusive behaviours.

Physical signs	Behavioural signs
• Speech disorders • Delays in physical development • Physical symptoms such as headaches and stomach aches • Being easily startled • Injuries as a result of harm.	• Behavioural signs may include: • Fear of and avoiding going home • Depression, anxiety, or suicidal thoughts • Violent or aggressive behaviour and language • Demonstrated fear of parents.