

Applies to	All Intereach workers. For the purpose of this policy, the term worker includes employees, volunteers, students, Family Day Care (FDC) educators and Directors. Contractors, consultants, visiting service providers, and any third parties delivering services on behalf of Intereach where children may be present.				
Version	9.0	Date approved	10/02/2026	Next review date	10/02/2027

1. Policy Statement

Intereach is committed to creating and maintaining a child safe environment where children and young people are protected, respected and empowered.

We uphold a zero tolerance of child abuse and neglect. All allegations, concerns and complaints are taken seriously and addressed in line with legislative requirements, the Child Safe Standards and our robust policies and procedures.

Our commitment extends to:

- Preventing harm through proactive risk management and protective strategies.
- Embedding “paramount consideration” as a statutory duty, ensuring children’s safety, rights, and best interests guide every decision made by Intereach.
- Requiring child protection and child safety training for all staff, volunteers, and students prior to commencing work.
- Promoting the cultural safety inclusion and participation of all children including aboriginal children, children from culturally and linguistically diverse backgrounds and children with disability.
- Embedding child safety into governance leadership an everyday practise.
- Maintaining robust recruitment, supervision and reporting processes.
- Ensuring workers are suitable, trained and supported to meet their child safety obligations.

Child safety is everyone’s responsibility. We expect all workers, managers, families, and communities to actively contribute to a culture where children feel safe, valued, and heard.

2. Objective

The objective of this policy is to:

- Define the roles and responsibilities across the organisation in safeguarding children and young people.
- Establish clear expectations for behaviour, reporting and accountability through the Child Safe Code of Conduct and related procedures.
- Ensure compliance with the Victorian and NSW Child Safe Standards, mandatory reporting laws and other relevant legislation.
- Build and maintain a child safe environment that is inclusive, transparent and responsive to the needs of children.
- Empower children as active participants in decisions that affect them, listening to and respecting their views.
- Support continuous improvement through training, supervision, feedback and complaints, risk management, documentation, and regular policy review.

3. Definitions

- **Child safety concerns** refer to any issue affecting the safety, welfare, or wellbeing of a child or young person, including risks of abuse, neglect, or harm. Concerns may arise from:
 - disclosures made by children or young people;
 - observations of behaviour, environments, or interactions; or
 - information provided by families, workers, or other sources.
 - A concern may relate to a single incident or a pattern of incidents, and must always be taken seriously, assessed, and responded to in line with legislative and organisational requirements.
- **Child/children or young person:** Anyone under the age of 18 years.
- **Child abuse/neglect:** Behaviour or treatment by parents, caregivers, other adults or older adolescents that causes, or is likely to cause physical or emotional harm to a child or young person. Behaviours may be intentional or unintentional and can include acts of omission (i.e. neglect) and commission (i.e. abuse), as defined by the [Australian Institute of Family Studies](#).
- **Cultural safety:** Aboriginal children and children from culturally and linguistically diverse backgrounds need an environment where identity is respected and never challenged, denied or diminished. It is built on shared respect, meaning, knowledge and experience of learning, living and working together with dignity and genuine listening.
- **Exempt from holding a Working With Children Check (WWCC):** A person who is not legally required to hold a WWCC under applicable State legislation due to the nature, duration or context of their role, age, relationship to the child, or existing statutory screening or professional registration; however, Intereach may still require a WWCC where this is necessary to manage child safety risk.
- **Mandatory reporter:** Certain professional groups are legally required to report reasonable belief of child physical or sexual abuse to child protection authorities:
 - NSW: regulated by the Children and Young Persons (Care and Protection) Act 1998 for further information go to <https://www.facs.nsw.gov.au/families/Protecting-kids/mandatory-reporters/about>; and,
 - Victoria: regulated by the Children, Youth and Families Act 2005, for further information go to <https://providers.dhhs.vic.gov.au/mandatory-reporting>.
- **Child related role** is defined by the Child Protection (Working with Children) Act 2012 (NSW) and the Working with Children Act 2005 (Vic) as a worker who is engaged in child-related work:
 - the worker has direct contact with children, and that contact is a usual and more than incidental part of to the work; or,
 - the worker is engaged in a designated a child-related role.
- **Persons with management and control** hold ultimate responsibility for governing and directing the organisation, including the Board and senior leaders, and who are accountable for ensuring compliance, resourcing, and effective risk management.
- **Inappropriate Conduct:** any behaviour within an education and care service that a reasonable person would consider to be inappropriate. When determining if conduct is inappropriate, consider:
 - Inappropriate physical contact – touching a child in a sexualised or intrusive way, including tickling, wrestling, prolonged or unnecessary hugging that is not warranted

in the circumstances, massaging, or physical closeness (such as encouraging a child sit on an educator's lap for an extended period) that is not age appropriate or required based on the needs or abilities of a child.

- Grooming behaviours – including but not limited to favouritism, offering gifts or special privileges, encouraging emotional dependency (attachment fostering), or initiating private or secret communication with a child.
- Ill treatment that is not disciplinary in nature – including physical or verbal abuse, threats, yelling, swearing, rough handling or other conduct likely to cause emotional, physical or psychological harm.
- Unprofessional communication – such as sending personal messages, capturing or sharing images of children via unauthorised devices or platforms, or engaging with children online through social media or apps unrelated to your role.

4. Responsibilities

Every person involved in Intereach has a responsibility to understand the important and specific role they play individually and collectively to ensure that the wellbeing and safety of all children and young people is at the forefront of all they do and every decision they make.

It is the responsibility of persons with Management and Control to:

- provide visible leadership and organisational oversight to ensure a strong culture of child safety is embedded across all areas of Intereach;
- ensure that this Policy and all supporting child safe policies, procedures and systems are approved, implemented, monitored and reviewed in line with legislative requirements and the Child Safe Standards in Victoria and NSW;
- ensure adequate governance arrangements are in place to monitor compliance with child safety obligations, including regular reporting on risks, incidents, complaints, audit findings and improvement actions;
- ensure that serious incidents, reportable conduct matters and emerging child safety risks are escalated appropriately and receive timely oversight and assurance;
- monitor trends in incidents, complaints, feedback and risk assessments to identify systemic issues and drive continuous improvement in child safety practice;
- ensure sufficient resources are allocated to support child safe systems, including workforce capability, training, supervision, systems, and safe environments;
- ensure leaders and managers are appropriately trained and supported to fulfil their child safety responsibilities and model expected behaviours;
- ensure engagement with relevant regulators, statutory authorities and external bodies occurs in a timely, transparent and cooperative manner;
- ensure organisational learning from incidents, reviews and external guidance is embedded into policy, practice and system improvements; and,
- promote accountability, transparency and ethical decision-making in all matters relating to the safety and wellbeing of children and young people.

It is the responsibility of Program Managers and Team Leaders to:

- ensure workers are engaged, trained and supported to act in accordance with this policy;
- actively promote cultural safety and inclusion amongst workers;

- ensure that mandatory child protection reports are consistent with legislative definitions and thresholds; and,
- consult with workers regarding identified child safety concerns that will not receive a statutory response and ensure that relevant referrals are made.

It is the responsibility of workers to:

- take all reasonable steps to protect children and young people from abuse;
- maintain safe and appropriate behaviour when working with children and young people;
- listen to children and young people and respond quickly to child safety concerns identified through disclosure or observation;
- support the active participation of children in the program, activities and services we offer;
- actively participate in training to support their understanding and knowledge in relation to child safety;
- actively participate in the review of all Child Safe documents;
- promptly advise their manager or nominated supervisor of child safety concerns;
- report any allegations and incident to the relevant statutory authority where it is reasonable to believe that physical and/or sexual abuse of a child or young person has occurred or is occurring, in line with legislative reporting definitions and requirements;
- make relevant referrals to support services;
- consider Child Safety when completing risk assessments for group activities or home visits;
- maintain records of child safety discussions, reports and actions; and,
- seek advice from the manager or Nominated Supervisor if support is required to meet any of these responsibilities, particularly in relation to meeting reporting requirements.

5. Policy

5.1. Child Safe Standards

The Victorian Child Safe Standards and the NSW Child Safe Standards are compulsory frameworks designed to ensure organisations actively create environments where children are safe, respected and empowered. These standards require organisations to go beyond responding to allegations of abuse by embedding proactive measures that prevent harm, promote wellbeing and strengthen child safety across all areas of practice. The Standards inform and guide practice in areas such as:

- governance and leadership;
- empowering children;
- involving and informing families and communities;
- equity and diversity in providing culturally safe and child friendly services;
- human resource practices;
- responding and reporting;
- knowledge, skills and awareness;
- physical and online environment;
- continuous review and improvement; and,
- accurate documentation and communication.

Please refer to [Child Safe Standards Victoria](#) or [The Child Safe Standards \(nsw.gov.au\)](#) for detailed information regarding these Standards.

5.2. Child Safe Code of Conduct

Intereach maintains a Child Safe Code of Conduct that sets clear expectations for:

- professional boundaries;
- ethical behaviour;
- acceptable and unacceptable relationships;
- behaviours that are permitted and those that are not.

All workers must agree to abide by the Child Safe Code of Conduct. Worker commitment is renewed each year through training, collaborative review and re-signing to confirm their ongoing obligations.

The Child Safe Code of Conduct is reviewed annually, with opportunities for workers, children and families to provide input. This ensures the code remains relevant, effective and reflective of community needs.

5.3. Recruitment and screening

- All employees undergo work checks during our hiring process to ensure suitability for child-related roles.
- Workers engaged in child-related work who are not exempt, along with all adults residing in an FDC residence, must hold a valid Working With Children Check (WWCC) in their respective State. Intereach will verify, monitor, and record these checks, with checks renewed every five years.
- Worker and Contractors who engage in child related work interstate (NSW or Victoria) must obtain a WWCC if the period of work exceeds a total of 30 days in any calendar year.
- Pre-employment reference checks are conducted prior to an offer of employment or engagement in any child related role, with a focus on child safety.
- All workers and adults residing in a FDC residence are required to undergo a National Criminal History Check or provide a Check that is less than six months old prior to appointment or registration, with checks renewed every three years.
- Recruitment decisions are supported by documented suitability assessments that consider screening outcomes, referee information and the nature of the role, with any identified risks assessed and managed.
- Where screening or referee information identifies potential concerns, matters are escalated to persons with management and control for appropriate review and decision-making prior to engagement.

All checks and screen requirements are verified, recorded and monitored in accordance with the [Intereach Work Check Policy](#).

5.4. Training, support and supervision

Training and education are essential to ensure everyone understands that child safety is a shared responsibility. Our culture encourages workers, families and children to feel confident raising concerns or allegations of abuse.

- Completion of training is supported by the [Intereach Learning and Development Policy](#) and supporting procedures.
- A training register records training completed by employees and volunteers.

- Training effectiveness is periodically evaluated through supervision, audits or staff feedback and reported to persons with management and control.

5.4.1. Mandatory Training

The following training modules are mandatory across all areas and levels of the organisation:

- Child Safe Standards and Child Safe Policy and [Intereach Child Safe Code of Conduct](#).
- Identifying indicators of child abuse and harm
- Supporting a person making a disclosure about harm to a child
- Responding to child safety issues, including internal and external reporting, notifying families, and managing risks to children
- Creating culturally safe environments within the organisation

5.4.2. Induction and Ongoing Training

New employees and volunteers must complete the Child Safe Standards, Child Safe Policy and Code of Conduct training upon commencement and retake this training annually.

Workers are trained to identify, assess, and minimise risks of child abuse and to recognise signs of harm.

Further training is provided appropriate to the role's engagement with children and the needs of children in the organisation, which is:

- identified in supervision or check-ins;
- trauma informed;
- offered on a regular basis to enable employees and volunteers to keep their skills and knowledge up-to-date; and,
- regularly reviewed and updated to remain effective.

Workers are supported with ongoing professional development to develop their skills to:

- protect children from abuse;
- promote the cultural safety of Aboriginal children;
- Support children from culturally and linguistically diverse backgrounds; and,
- ensure inclusion and safety of children with disability.

5.4.3. Support and Supervision

New workers are supervised regularly to reinforce our commitment to child safety and to check that behaviour towards children is safe and appropriate consistent with the *Intereach Child Safe Code of Conduct*.

Any inappropriate behaviour is reported promptly through appropriate channels, including:

- the Department of Families, Fairness and Housing or Department of Communities and Justice,
- Office of the Children's Guardian (NSW) or Commission for Children and Young People (Vic) (Reportable Conduct Scheme)
- NSW Police or Victoria Police, depending on the severity and urgency of the matter.

5.5. Risk Management and Continuous Improvement

We are committed to reducing risk to children by implementing pre-emptive and protective strategies.

- A key part of this approach to mitigating and preventing risk is the completion of an annual Child Safe Risk Management Plan (CSRMP) by individual programs delivering services to children.
- Risk assessments and Child Safe Risk Management Plans are informed by analysis of incident trends, complaints and feedback, audit findings, and feedback from children to support continuous improvement in child safety.
- These plans are reviewed annually to ensure risks are identified, monitored and addressed.
- All activities organised by Programs must consider Child Safe Standards at every stage - planning, risk assessment, implementation and review.
- Workers are supported to apply child safe principles through clear procedures, work practices and ongoing supervision.

5.6. Allegations, concerns and complaints

We take all allegations of child abuse seriously. We have clear practices in place to ensure concerns are investigated thoroughly, quickly and fairly.

- All workers are trained to respond appropriately to allegations.
- Children, families and workers are informed about what to do and who to contact if they observe abuse or are a victim or notice inappropriate behaviour.
- Children are provided with accessible, child-friendly ways to raise concerns or complaints, including information presented in age-appropriate language and visual formats, and support from trusted adults to help them understand their rights and how to seek help.
- Every adult has a responsibility to report allegations of abuse if they have a reasonable belief that an incident has occurred.
 - Failure to report suspicions of child abuse is an offence under NSW and Victorian law.
 - Factors contributing to reasonable belief may include:
 - a child states they or someone they know has been abused (noting that sometimes the child may in fact be referring to themselves);
 - behaviour consistent with that of an abuse victim is observed;
 - someone else has raised a suspicion of abuse but is unwilling to report it; and,
 - observing suspicious behaviour.

We are committed to ensuring that all allegations are acted upon promptly, reported to the appropriate statutory authority, and managed in line with our legal obligations and organisational procedures

We welcome all feedback and complaints, and we are committed to seeking and receiving input about our services. We recognise that feedback and complaints are an important part of continuous improvement and essential for maintaining positive relationships between our services and the community.

Refer to the [Intereach Feedback and Complaints Policy](#) for more information.

5.7. Communication

- Regular information sessions are held for workers to reinforce child safe practices and responsibilities.
- Our Child Safe Policy will be introduced and discussed during induction for all new workers.
- Children and parents joining our programs will receive information on Child Protection, which may include a copy of the Policy, *Child Safe Code of Conduct* and *Feedback and Complaints Policy*.
- All information will be provided in accessible formats appropriate to the target audience, ensuring clarity and understanding.
- A range of communication strategies are used across our services to ensure child safe expectations are consistency practised and understood by workers, families and children.
- Child safe expectations, feedback and reporting pathways are communicated to community members, partner organisations and external service providers involved in Intereach programs to support shared understanding, consistent practice and safe engagement with children.

5.8. Documentation

- All personal information collected or recorded must respect the privacy of the individuals involved, whether they be workers, families or children, except where disclosure is necessary to protect someone's safety or to meet mandatory reporting obligations under NSW and Victorian child protection legislation.
- Records are stored in accordance with privacy principles, with access restricted to authorised personnel only.
- Records relating to pre-employment checks, investigations and any other sensitive child protection matters are stored under secure electronic format.
- Records are be retained in line with statutory requirements and the [Intereach Data Security and Retention Policy](#).
- Under Freedom of Information legislation, a person has the legal right to obtain access to information held as records by Intereach including information on relevant employment proceedings.
- Where personal records are inaccurate, amendments may be requested. If access is denied or an amendment is refused there is an appeal process per the Freedom of Information Act.

5.9. Review

This Policy will be reviewed annually and involve feedback from all stakeholders.

5.10. Breach of Policy

Failing to comply with this policy may result in disciplinary action and/or termination of employment or engagement with Intereach and/or referral to authorities as required.

6. Context	
6.1. Standards or other external requirements	<p>Aged Care Rules - CHSP Grant Agreement - appendix f - chsp compliance framework version 2 nov 25.docx</p> <p>Australian Charities and Not-for-profits Commission (ACNC) Governance Standards</p> <p>Australian Human Rights Commission National Principles for Child Safe Organisations 2019</p> <p>National Quality Standards</p> <p>NSW Child Safe Standards</p> <p>NSW Department of Communities and Justice</p> <p>NSW Office of Children’s Guardian</p> <p>Victorian Child Safe Standards 2022 (Vic)</p> <p>Victorian Department of Families Fairness and Housing</p>
6.2. Legislation or other requirements	<p>Aged Care Act 2024 (Cth)</p> <p>Child Protection (Working with Children) Act 2012 (NSW)</p> <p>Child Wellbeing and Safety Act 2005 (Vic)</p> <p>Children and Young Persons (Care and Protection) Act 1998 (NSW)</p> <p>Children, Youth and Families Act 2005 (Vic)</p> <p>Children’s Guardian Act 2019 Amendment (Child Safe Scheme) 2021</p> <p>Crimes Act 1900 (NSW)</p> <p>Crimes Act 1958 (Vic)</p> <p>Education and Care Services National Regulations 2011 (Cth) - clauses 84</p> <p>Failure to Disclose 2014 (Vic)</p> <p>Freedom of information Act 1982 (Cth)</p> <p>Privacy Act 1988 (Cth)</p> <p>Working with Children Act 2005 (Vic)</p>
6.3. Reference Internal documents	<p>Child Protection Procedure</p> <p>Child Safe Code of Conduct</p> <p>Children’s Services Children’s Health and Safety Policy</p> <p>Code of Conduct Policy</p> <p>Disciplinary and Dismissal Policy</p> <p>Domestic and Family Violence Policy</p> <p>FDC Educator Registration, Monitoring and Support Procedure</p> <p>FDC Fit and Proper Assessment of Educators Procedure</p> <p>Feedback and Complaints Policy</p> <p>Learning and Development Policy</p> <p>Privacy Policy</p> <p>Recruitment and Selection Policy</p> <p>Work Check Policy</p>

7. Document control			
Version	Date approved	Approved by	Next review date
1.0	December 2014	Combined Leadership Group	December 2017
2.0	December 2016	Combined Leadership Group	December 2019
3.0	December 2017	Leadership Governance Group	December 2019
4.0	9 October 2019	Leadership Governance Group	9 October 2022
5.0	3 November 2020	C. Holness, Senior Manager, WHS and Quality	3 November 2023
6.0	14 April 2021	Senior Leadership Governance Group and Board	14 April 2023
7.0	8 September 2021	Senior Leadership Governance Group and Board	8 September 2023
8.0	9 February 2024	Quality Governance Group	9 February 2026
8.1	17 October 2024	Quality Governance Group	9 February 2026
8.2	11 February 2025	Quality, Risk and Performance Governance Group	9 February 2026
9.0	10 February 2026	Quality, Risk and Performance Governance Group	10 February 2027