

Child Safety Policy and Code of Conduct

1 Purpose

The purpose of this Policy and Code of Conduct is to outline Greater Shepparton Lighthouse Project's (GSLP) commitment to the safety and wellbeing of children and young people and to being a child safe organisation.

This Policy and Code of Conduct outlines the child safe principles and processes that GSLP will follow in all areas of our work to meet this commitment. It also describes the responsibilities and expected behaviours of all GSLP workers in ensuring the safety and wellbeing of children and young people.

2 Scope

This Policy and Code of Conduct applies to all GSLP employees, volunteers, Board members, interns, trainees, contractors, consultants, and other workers, both paid and unpaid (henceforth referred to as GSLP workers).

3 Introduction

GSLP is committed to child safety and wellbeing in accordance with the Australian National Principles for Child Safe Organisations and the Victorian Child Safe Standards. We want children to be safe, happy, and empowered, prevented from harm, and we aim to provide an environment through all GSLP programs and initiatives that allows this.

All GSLP workers have a responsibility to understand the important role they play in ensuring that the safety and wellbeing of, and prevention of harm to, all children and young people is at the forefront of all decisions made and actions taken.

All GSLP workers must act in accordance with this Policy and Code of Conduct at all times. Any breach of this Code of Conduct may result in disciplinary action up to and including termination of employment or engagement. If a breach or allegations of a breach constitute an offence under Federal or State legislation, the matter will be reported to the Police.

4 Principles

In establishing and maintaining a child safe organisation that meets all legislative and best practice standards, GSLP will be guided by the principles of:

- Complying with all relevant Australian and Victorian child safety legislation and standards

- Always demonstrating the highest standards of behaviour towards children and young people by following the Child Safety Policy and Code of Conduct and championing child safety in our work and programs
- Taking disciplinary action in the event of a breach of the Child Safety Policy and Code of Conduct
- Putting the rights, interests and needs of children and young people first, including emotional, psychological, and physical needs
- Ensuring the safety, wellbeing, participation, and empowerment of all children engaged with GSLP programs, including those from Aboriginal and/or Torres Strait Islander or other culturally and/or linguistically diverse backgrounds, and those with disabilities
- Creating an environment where children and young people are informed and empowered to understand their rights, and made aware of what is acceptable and unacceptable, and what they can do if there is a problem or a concern
- Preventing child harm and abuse by identifying risks early, and removing and reducing these risks
- Reporting concerns about a child's safety or wellbeing to relevant authorities in a timely manner following reporting requirements
- Managing the confidentiality of all child safety concerns appropriately
- Thoroughly screening prospective workers for their suitability to work with children, including requiring all workers to pass a pre-employment/pre-engagement employee or volunteer Working with Children Check (WWCC) as relevant to their role and maintain their WWCC throughout their employment or engagement with GSLP
- Regularly training and educating workers on child safety and wellbeing
- Regularly reviewing and improving our Child Safety Policy, Code of Conduct, principles, and practices.

5 Code of Conduct

GSLP workers **must**:

- Act in accordance with GSLP's Child Safety Policy and Code of Conduct at all times
- Behave respectfully, courteously, and ethically towards children and their families
- Create an environment that promotes and enables children's participation and is welcoming, culturally safe, and inclusive for all children and their families
- Involve children in decisions about the activities they participate in and welcome the participation of parents and carers in these decisions
- Demonstrate appropriate personal and professional boundaries
- Listen and respond to the views and concerns of children, particularly if they communicate (verbally or non-verbally) that they do not feel safe or well, including taking disclosures of harm or abuse made by a child seriously
- Take all reasonable steps to protect children from harm or abuse
- Report all suspected or disclosed child harm or abuse in a timely manner by following the reporting process outlined in this Policy

- Participate in all compulsory child safety training
- Respect the privacy of children and their families, including keeping all personal information confidential unless required by law to share it
- Comply with all relevant Australian and Victorian legislation.

GSLP workers **must not**:

- Ignore or disregard any concerns, suspicions or disclosures of child abuse or harm
- Fail to report information relating to child abuse to the police, including through committing failure to protect or failure to act offences
- Condone or participate in illegal, unsafe, abusive or harmful behaviour towards children, including grooming
- Use inappropriate language (including sexual language or gestures) in the presence of children
- Engage in open discussions of a mature or adult nature in the presence of children (for example, about personal social activities)
- Initiate unnecessary physical contact with children or do things of a personal nature that children can do for themselves, like help them on the toilet or assist them to change
- Develop 'special' relationships with specific children or show favouritism (for example through the provision of gifts or showing of inappropriate attention)
- Have unauthorised contact with children and young people online, on social media or by phone
- Exchange personal details with children, such as a phone number, email address or social media handles
- Take photographs, screenshots or share images of children involved in activities that are not authorised and are on a private phone
- Be alone with a child unnecessarily (for example, it may be necessary to be alone with a child in an emergency situation).

6 Reporting child safety concerns

If a GSLP worker has any concerns regarding the health, safety, or wellbeing of a child, they must take immediate action. There is a positive obligation on GSLP workers to report any instances where they witness an incident, receive a disclosure, or form a reasonable belief that a child has, or is at risk of being abused. It is a criminal offence for an adult to fail to disclose a matter such as those outlined in 6.2, 6.3 and 6.4; and fail to protect a child from harm.

GSLP ensures the confidentiality of the identity of reporters in accordance with relevant legislation.

6.1 Forming a reasonable belief

A reasonable belief is more than suspicion. There must be some objective basis for the belief. However, it is not the same as having proof and does not require certainty.

For example, a person is likely to have a reasonable belief if they:

- Observed the conduct themselves
- Heard directly from a child that the conduct occurred
- Received information from another credible source (including another witness).

In the absence of witnessing abuse, or receiving a disclosure of abuse, the GSLP worker may form a reasonable belief that a child is being subjected to abuse through:

- Physical indicators – including bruises, burns, cuts and grazes to the face, child pregnancy; and/or
- Behavioural indicators – including aggressive behaviour, reluctance to go home, fear of physical contact with adults, overly shy or passive demeanour, habitual absences to commitments or programs, poor sleeping habits, depression, drug, or alcohol abuse.

A GSLP worker may form a reasonable belief that an adult is abusing or grooming a child if they witness, or receive a disclosure regarding someone:

- Touching a child inappropriately
- Inappropriate contact with a child including via telephone, or online through emails and social media
- The giving of gifts to a child
- Inappropriate preferential treatment of a child
- Inappropriate social boundaries including discussing sexual content
- Offering to drive a child
- Inviting themselves to the child's home.

6.2 Emergency reporting of child abuse

If a child has just been abused or is at immediate risk of harm, GSLP workers must do the following:

- Dial '000' to report the incident to Victoria Police and seek an ambulance if urgent medical attention is required
- If it is safe to do so, and they have the capability, separate the victim and others involved and ensure both parties are supervised by a GSLP worker
- Maintain the integrity of the potential crime scene and preserve evidence (where necessary and possible), including by not touching the crime scene or disposing of clothing or relevant items

Once the emergency situation has been managed, GSLP workers must:

- Contact the GSLP Child Safety Reporting Officer, who will be the point of contact with the police and manage all future case management of the matter.
- File a child safety incident report through the Risk Register.

6.3 Non-emergency reporting of child abuse

If a GSLP worker:

- Witnesses an incident of child abuse (that is not an emergency under 6.2)
- Receives a disclosure about child abuse, or
- Forms a reasonable belief that a child has been abused or is in danger of being abused, even if they are unsure and have not directly observed child abuse

Within 24 hours, GSLP workers must:

- Report the matter to Victoria Police; and
- File a child safety incident report through the Risk Register.

Where a GSLP worker believes on reasonable grounds that a child is in need of protection, they must:

- Report this to Victoria Police; and
- File a child safety incident report through the Risk Register.

A child may be in need of protection if:

- The child has been abandoned or their parents are dead or incapacitated and
- There is no other suitable person who is willing and able to care for the child
- The child has suffered or is likely to suffer significant harm because of physical injury or sexual abuse and the parents are unable or unwilling to protect the child
- The child's physical development or health has been or is likely to be significantly harmed and the parents are unable or unwilling to provide basic care, or effective medical or other remedial care.

The GSLP Child Safety Reporting Officer will receive the report and must work with the reporter/witness and the Police to case manage the matter.

Where the source of suspected abuse is from within the family or community, the Child Safety Reporting Officer must also report the matter to DHHS, and case manage the matter.

6.4 Responding to a disclosure

If a child makes a disclosure to a GSLP worker about child abuse, it is important that they respond in an appropriate and supportive manner. When managing a disclosure, GSLP workers should:

- Listen to the child, take notes if appropriate
- Stay calm and control expressions of panic or shock
- State clearly that the abuse was not the child's fault – no matter what the circumstances are
- Use the child's language and vocabulary
- Take steps to ensure an Aboriginal child feels culturally safe
- Reassure the child that they believe them and that disclosing the matter was the right thing to do

- Tell the child they are required to report the disclosure to a Child Safety Reporting Officer, and they may be required to report it to Victoria Police and/or DHHS
- Tell the child they will respect their confidentiality and will only share relevant information with those necessary to manage the situation

6.5 Completing a child safety incident report

After reporting a child safety incident to Victoria Police, or if a GSLP worker witnesses or receives a report of a child safety 'near miss', they must complete a child safety incident report through the Risk Register. The report should include:

- Relevant dates, times, locations, and people
- A description of the concerns (e.g. physical injuries, child behaviour)
- The source of those concerns (e.g. observation, report from child or another person)
- Record of the complainant's description of the incident using their own words
- The actions taken as a result of the concerns (e.g. consultation with Child Safe Reporting Officer, report to DHHS Child Protection or Victoria Police).

All reporting notes and records are to be retained confidentially in a restricted SharePoint location, accessible only to the Executive Officer and Business Manager.

The identity of the reporter will be protected (and will be de-identified from all reporting documents) unless disclosure is required in accordance with relevant legislation.

7 Recruitment

All workers employed or engaged by GSLP will be thoroughly assessed through the recruitment process for their employment (paid employees) or engagement (volunteers) to prevent a person being engaged who may pose an unacceptable risk to the safety or wellbeing of a child.

GSLP's recruitment practices include:

- Including the requirement to hold a WWCC as an inherent requirement of the role in job advertisements and position descriptions
- Including the role requirement to uphold and champion the highest standards of child safety in job advertisements and position descriptions
- Assessing candidates' suitability for working with children and young people in positions at GSLP in interviews and reference checks
- (For paid employees) including in employment contracts that it is a condition of employment to hold a valid WWCC in, as well as outlining the discretion for GSLP to rescind an offer of employment or terminate employment if a negative WWCC is received or contains disclosable outcomes
- Conducting pre-employment and annual police checks on paid employees and volunteers
- (For volunteers) checking for valid Volunteer Working With Children Checks prior to engagement

8 Working With Children Checks

All workers employed or engaged by GSLP will be subject a Working With Children Check (WWCC) as a condition and inherent requirement of their employment or engagement with GSLP to prevent a person being engaged who may pose an unacceptable risk to the safety or wellbeing of a child.

A WWCC helps protect children from sexual and physical harm by ensuring people who volunteer with, work with, or care for children, are subject to a screening process.

The WWCC screens for:

- Sexual, violent and drug offence
- Any offence that presents an unjustifiable risk to the safety of children
- Offences under the *Worker Screening Act 2020*

All GSLP workers, including paid employees and volunteers, are required to hold, maintain and provide a copy of their WWCC as an inherent requirement of their role to prevent a person being engaged who may pose an unacceptable risk to the safety or wellbeing of a child. Copies of WWCCs will be stored confidentially.

It is an offence under s.125 of the *Worker Screening Act 2020* to use a volunteer WWCC in place of an employee WWCC.

8.1 New workers

New workers are required to apply for, pay for, and provide GSLP a copy of their valid WWCC prior to commencing their role at GSLP.

Further, new workers must nominate GSLP as the organisation which employs or engages them to ensure that notification is provided to GSLP of any status update in relation to their WWCC.

8.2 Existing workers

Existing workers are required to maintain a valid WWCC throughout their employment or engagement with GSLP. This includes notifying GSLP immediately of any changes to their WWCC status during their employment or engagement, renewing their WWCC prior to its expiry (for which GSLP will pay), and notifying GSLP of the new expiry date.

You must notify the Department of Justice & Community Safety and your GSLP manager in writing within 7 days if, at any time during your employment or engagement with GSLP:

- You are charged with, convicted, or found guilty of a sexual, violent or drug offence or the charge has been dealt with by a court
- You have had a professional conduct report made against you.

You will be unable to continue employment or engagement with GSLP until you have been cleared by the Department of Justice & Community Safety.

8.3 Negative WWCC notices

GSLP workers who are unable to receive a valid WWCC will not be able to continue working or volunteering for GSLP and their employment or engagement with GSLP will end immediately due to being unable to fulfil the inherent requirements of their role.

If a prospective worker receives a negative notice, or their WWCC contains disclosable outcomes, their offer of employment will be revoked, and they will not be able to commence work at GSLP.

9 Training

All employees will be required to participate in child safety training provided by GSLP at regular intervals.

10 Child safety risk management

GSLP programs will be designed with a child safety focus to identify, minimise, mitigate, and manage risks of harm to children and young people whilst participating in GSLP programs, activities, or events. This includes advocacy, campaigns, child/youth led projects, online/social media and use of technology, fundraising, research, and other activities involving the participation of children and young people.

A child safety risk assessment will be conducted as part of the development of any GSLP program.

11 Information and communication technologies

GSLP workers must consider and ensure the safe use of information and communication technologies such as the internet, websites, social networking sites, and digital photography to ensure that children are not put at risk.

When using children's images through photography, film, or other content creation, GSLP workers must:

- Assess and endeavour to comply with local traditions or restrictions for reproducing personal images before photographing or filming a child
- Obtain informed consent from the child and documented consent from the parent/guardian of the child before photographing or filming a child, including explaining how the photograph or film will be used
- Ensure photographs, films, videos, and DVDs present children in a dignified and respectful manner
- Ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form

- Ensure a child/young person is not subject to a legal order (i.e. Family Court, domestic violence order, child protection or criminal order) where the safety of the child/young person or parent/guardian may be at risk or the privacy of the child/young person is compromised, if the identity and location of the child/young person is revealed.

12 Definitions

<i>Child / young person</i>	Anyone under the age of 18 years
<i>Child abuse</i>	Any act committed against a child involving: <ul style="list-style-type: none"> • physical violence • sexual offences • serious emotional or psychological abuse • serious neglect.
<i>Child Safe Standards</i>	<p>The Child Safe Standards are a Victorian Government initiative and are compulsory for all organisations providing services to children. They aim to drive cultural change in organisations so that protecting children from abuse is embedded in everyday thinking and practice of leaders, staff and volunteers.</p> <p>The aim of the Child Safe Standards is to:</p> <ul style="list-style-type: none"> • prevent child abuse • encourage reporting of any abuse that does occur • improve responses to any allegations of child abuse.

13 Related documents

- [National Principles for Child Safe Organisations](#)
- [Victorian Child Safe Standards](#)
- [Worker Screening Act 2020](#)

14 Document history

Version	Date approved	Summary of changes	Approved by	Version author	Next review date
1.0	June 2023	Review of existing and establishment of new child safe code of conduct and policy	GSLP Board	HR Consultant	June 2025