

Quality Area 2 – Children’s Health and Safety

Child Safety, Wellbeing and Protection

Policy/Procedure Number: **QA2 - 1**

Policy/Procedure Requirement: National Quality Standards 2 & 7; Regulations 168; ACT Child Safety Standards

Policy Statement

The safety and wellbeing of enrolled children is of paramount importance to the Service and it is committed to ensuring the safety and wellbeing of all enrolled children. This Child Safety and Wellbeing Policy sets the framework to guide every aspect of the Service operation and ensure that all Educators registered with the Service understand the ACT Child Safety Standards and provide a safe environment for children in their care.

Rationale

The Policy will assist the Service staff and Educators comply with all the legal and regulatory obligations in relation to child safety and wellbeing. The Policy will assist the Service in embedding the ACT Child Safety Standards.

Strategies and Practices

Responsibilities of the Service:

The Service aims to be a “child safe organisation” that creates a culture, adopts strategies and takes action to promote child wellbeing and prevent harm to children.

The Australian Human Rights Commission defines a child safe organisation as one that consciously and systematically:

- Creates an environment where children’s safety and wellbeing is at the centre of thought, values and actions.
- Places emphasis on genuine engagement with and valuing of children and young people.
- Creates conditions that reduce the likelihood of harm to children and young people.
- Creates conditions that increase the likelihood of identifying any harm.
- Responds to any concerns, disclosures, allegations or suspicions of harm.

The Service will:

- Implement the ACT Child Safe Standards across the Service through information provision, policies and relevant training
- Ensure **Educators, Coordinators, Nominated Supervisor and other staff recruited are fit and proper persons** and of good character:
 - No Educator will be registered by the Service unless the Educator and all persons residing at FDC residence have valid Working with vulnerable people’s Check (WWVP)
 - Ongoing monitoring of WWVP status of Educators and adult residents at FDC by the Coordinator during the 3 monthly assessments
 - All Educator or staff applicants will be reference checked with previous employers and non-work related referees
 - Require the applicants provide valid national police check that is less than 6 months old

- Nominated Supervisor and Coordinator to interview the applicants to assess the Educator applicant's experience, motivation for FDC provision etc
- Provide environments that ensure children, and their families feel valued
- Promote the agency of children so they learn about their rights, including to safety, to information, to be listened to, and to have their views respected
- Continuously promote child safety and wellbeing as paramount for Educators in providing FDC
- Take all reasonable steps to ensure that no child experience abuse or harm
- Consider the best interests of the child in dealing with any concerns about child safety and wellbeing
- Take any allegations or complaints in relation to child safety seriously, and respond promptly and appropriately with urgency, care and diligence
- Report any allegations or concerns to relevant authorities, including ACT Child Protection Services, and/or Regulatory Authority as required or appropriate
- Promote its stated value of "respect for others" and act against any form of bullying or harassment within the Service
- As required, undertake an internal investigation to determine appropriate action to be taken in relation to a report against an Educator, Coordinators or visitor, and report to the ACT Regulatory Authority, Child Protection Services and/or Police
- Work in collaboration with other agencies and organisations to ensure children's safety and wellbeing is supported

Responsibilities of the Coordinators:

The Coordinators will ensure:

- All Educators complete (and renew every two years) appropriate **child protection training**
- All Educators and all persons residing at the FDC residence over 18 years have **current WWVP** registration
- All Educators are aware of and adhere to this policy including the requirements of Service's [Child Safe Code of Conduct](#) and **ACT Child Safe Standards**
- That all risks to child safety and wellbeing are identified and actions taken to address these risks
- Appropriate risk assessments (e.g. sleep, transportation, playground) have been undertaken by Educators
- The ACT Child Protection Helpline (Phone: 1300 556 729) is notified if there is reasonable suspicion that a child has been or is being abused or neglected, and the suspicion is formed in the course of their work
- Service procedures are followed regarding any investigation where suspicion of child abuse relates to an individual in a FDC residence
- All areas of concern in relation to child protection matters are documented, and **confidentiality** is maintained
- The wellbeing of the children is protected by acting sensitively in child related matters
- Appropriate support is provided to Educators, and/or families when a **child safety concern is reported**, or a serious incident occurs
- All processes are conducted in a sensitive and respectful manner in accordance with the principles of procedural fairness

- Educators have access to the most up to date information and resources on child safety
- Identify professional development opportunities and support to Educators on child protection
- Report any specific concerns, including any reasonable grounds to suspect a **child is at risk of significant harm**, promptly to the Service Manager or Coordinator

Responsibilities of the Educators:

The Educators will:

- Ensure the care environment is safe and healthy
- Comply with the Service [Child Safe Code of Conduct](#)
- Familiarise themselves with **ACT Child Safe Standards**
- Familiarise themselves with the **Keeping Children and Young People Safe guide** and ensure their knowledge of **Mandatory Reporting** is current, and keep the Mandatory Reporting Line (1300 556 728) to the ACT Child Protection Services on or near their phone
- Maintain current **Working With Vulnerable People** (WWVP) for themselves and any adult residing at the FDC residence
- Guard children against harmful environments with appropriate actions, such as adequate supervision and/or ensuring safe environments.
- Take positive steps to maintain the safety and wellbeing of children in their care
- Conduct themselves professionally and appropriately in the presence of children, and as a role model in the best interest of children
- Not take any inappropriate risks
- Not engage in inappropriate physical contact with children
- Not act in ways that may cause a child to reasonably fear that unjustified force will be used against them such as:
 - harming a child either physically or emotionally
 - exposing a child to behaviour which may cause physical or emotional harm
 - restraining a child, unless this is part of an approved behaviour management plan
- Challenge any **inappropriate or harmful behaviour** of any **adult** or **older children** and report accordingly
- Notify the Service Manager and **Child Protection Services** if there is reasonable suspicion that a child has been or is being abused or neglected and the suspicion is formed during FDC provision
- If unsure, seek advice from the Coordinator or Manager on matters relating to child protection
- Keep a record of visitors, including the name, signature and time of arrival and departure
- Ensure visitors are not left alone with any child being educated and cared for
- Ensure children do not leave their care unless accompanied by a parent or an authorised nominee

Responsibilities of the Parents:

The Parents should:

- Report immediately of any concerns of a child being at risk of harm at FDC, to the Service Manager/ Nominated Supervisor
- Maintain confidentiality and respect the privacy of those involved in any incident that may occur
- Seek support and advice from the Manager/ Nominated Supervisor or Coordinators if required

(i) ACT Child Safety Standards

The 10 ACT Child Safety Standards are:

1. Child safety and wellbeing is embedded in organisational leadership, governance and culture.
2. Children and young people are informed about their rights, participate in decisions affecting them, and are taken seriously.
3. Families and communities are informed and involved in promoting child safety and wellbeing.
4. Equity is upheld and diverse needs are respected in policy and practice.
5. People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
6. Processes to respond to complaints and concerns are child focused.
7. Staff and volunteers are equipped with the knowledge, skills, and awareness to keep children and young people safe through ongoing education and training.
8. Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
9. Implementation of the Child Safe Standards is regularly reviewed and improved.
10. Policies and procedures document how the organisation is safe for children and young people.

(ii) Service Child Safe Code of Conduct

The Service provides an open, welcoming and safe environment for all enrolled children in our service. We aim to provide high quality education and care that is safe for each child. All Educators, Educators' families and staff are responsible for ensuring children are safe whilst in care.

Educators (and Coordinators as appropriate) will follow the Child Safe Code:

To:

- Take all reasonable steps to protect children from abuse and/or neglect
- Have boundaries around conduct with children
- Help children learn protective behaviours
- Report and act on all complaints of abuse to the Service CEO
- Fully include all children in the Service's programs
- Educate children about their rights
- Assist children to develop skills around dressing and toileting themselves
- Inform families and Coordinators when visitors are staying at FDC residence
- Treat all enrolled children with the same amount of care as would your own children/ grandchildren

Not To:

- Put children at risk of abuse
- Ridicule, yell, pull, push or hit a child under any circumstance
- Be unnecessarily physical with children
- Have discussions of a mature or adult nature when children are there
- Develop special relationships with individual children
- Discriminate against children or express personal views on cultures, race or sexuality
- Leave children alone with members of Educator's families or visitors to FDC residences
- Assist children with changing and toileting if they no longer need assistance
- Have contact with a child or their family outside of the Service
- Make any private care arrangements with families outside of the Service
- Use tobacco, vaping substances or devices, or be under the influence of drugs or alcohol whilst caring for children

(iii) Use of Electronic Devices and Taking Images & Videos:

FDC Educators may take **images and videos** of an enrolled child **only** for **recording child learning and assessment or evaluations** and **only with prior authorisation of a parent** in the **Parent Agreement Form** at the time of commencing care.

Taking or using images or videos for any other purpose is strictly prohibited.

The changes to NQF require services to have policies and procedures in place for the safe use of digital technologies and online environment.

To give effect to the NQF, the National Model Code, and the ACT Regulatory Authority requirements, it has been made **mandatory for all Service staff and FDC Educators** to:

- **Register** with the Service, a digital device (e.g. phone, tablet, digital camera) to be used **solely for FDC purposes**, including taking images and/or videos of enrolled children in their care by providing its **make, model** and **serial number**

FDC Educators and staff (including FDC Coordinators) are **strictly prohibited** from:

- **Using** the registered device at any time for **any personal or non-FDC related purposes**
- Allowing anyone else, including the Educator's family members, **use of the registered device**
- **Using any other device** at any time to take any images or videos of a child
- **Transferring** any image or video of a child to **any other device or cloud storage**
- **Sharing** any image or video of a child with any person other than the child's parent or guardian, or persons specified in Reg 182
- **Publishing or posting** any image or video of a child in **any social media** (e.g. Facebook, Instagram, X) for any reason

FDC Educators and staff (including FDC Coordinators) **must**:

- **Only print images** that are necessary for a child's **portfolio or recording of child's learning**
- **Delete permanently** all images and videos of a child within 14 days of taking the images or videos

- **Allow access** to the Nominated Supervisor, Coordinators, Authorised Officers of the Regulatory Authority, or any person authorised by the ACT or Commonwealth Government to examine the registered device

Images and videos of a **child** taken in FDC may **only be shared** with that **child's parent or carer**, the Approved Provider, Nominated Supervisor, the Regulatory Authority or its authorised officer, or to a person/ organisation expressly authorised, permitted or required to be given by or under any Act or law as specified in Reg182.

(iv) Online Child Safety:

The Service has a strict **no screen time** for all under school aged children. School aged children may be allowed TV occasionally for short periods not exceeding 30mins.

FDC Educators **under no circumstance can allow** access to **any electronic device** such as their personal phones, tablets or computers with online connectivity to any child in their care.

As stated in the previous section, images and videos of a **child** taken by an Educator in the provision of FDC may **only be shared** with specified persons or circumstances under Reg182 and **must not be provided to or shared with any other person or organisation, or published in digital or print media** (e.g., Facebook, Instagram, X, newspapers, promotional materials).

(v) Sexualised Behaviour of Children:

- If an Educator observes sexualised behaviour in a child or there is a concern or complaint about the sexualised behaviour of a child by another child or another child's parent, it must be reported to the Coordinator and/or the Service Manager immediately
- Any concerns need to be assessed against the **Traffic Light System to Assess Sexual Behaviour**. Not all sexualised behaviours are harmful, and children may exhibit age-appropriate sexual behaviours that may be part of normal and healthy development
- Educators and Coordinators must be able to differentiate between "age-appropriate sexual behaviours" and "concerning sexual behaviours" of children
- All reportable incidents are reported to the ACT Ombudsman, the ACT Regulatory Authority and other relevant agencies as required

Managing Harmful Sexual Behaviour

The process below is adapted from the ACT Government's 4 step process for managing incidents or complaints of harmful sexual behaviour in schools.

- **Action 1: Immediate Response to an Incident**
 - If there is no risk of immediate harm go to Action 2
 - If children are at immediate risk of harm staff must ensure safety by:
 - separating alleged students affected by harmful sexual behaviour and others involved
 - administering first aid
 - for urgent medical or police assistance call 000 for immediate health or safety concerns
 - contact Child Protection Helpline and/or police
 - reassuring child/ren

- **ACTION 2. Reporting and Consulting**

- Educator must report to the Nominated Supervisor an incident, disclosure or reasonable belief of student harmful sexual behaviour as soon as possible
- In consultation with the Coordinator/ Nominated Supervisor, use the traffic light system and contextual information to assess whether the behaviour:
 - constitutes harmful sexual behaviour
 - is indicative of any other abuse
- Nominated Supervisor to contact Child Protection Helpline and if harmful sexual behaviour is determined, will be guided by Child Protection if it is to be reported to police and what information can be shared with parents
- Staff must keep comprehensive notes relating to an incident or complaint of harmful sexual behaviour

- **ACTION 3. Contact Parents if Appropriate**

- Child Protection and/or police will provide advice on information that can be shared with parents of all impacted students
- They may advise:
 - not to contact the parents (e.g. in circumstances where contacting the parents is likely to adversely affect a Child Protection or police investigation)
 - to contact the parents and provide agreed information (this must be done as soon as possible, preferably on the same day of the incident, disclosure or reasonable belief).
- The Nominated Supervisor and/or Approved Provider consider how the information will be shared (e.g. in person)
- If behaviour is not considered harmful sexual behaviour, but is still considered concerning, the Nominated Supervisor and/or Approved Provider may be guided by Child Protection on what information can be shared with parents

- **ACTION 4: Ongoing Support**

- The Service provide support for children affected or engaged in harmful sexual behaviour

(vi) Child Protection

The Service provides guidance and strategies for Educators and parents on the risks and forms of child abuse and how a child safe and child friendly environment will be maintained in the Service.

The Nominated supervisor, Coordinators and all FDC Educators have a **legal and ethical responsibility** to identify and respond to children at risk of harm, guided by the **Children and Young People Act 2008**, the **Child Safe Standards**, and the **National Quality Framework**.

The Nominated supervisor, Coordinators and all FDC Educators **must undertake appropriate child protection training every 2 years**.

A child is considered at **risk of significant harm** when their basic needs are not met, or when they are at risk of being abused or neglected. This can include:

- **Physical abuse** – unexplained injuries, frequent accidents, fearful behaviour around adults
- **Emotional abuse** – withdrawal, extreme behaviours (aggression, anxiety, fearfulness), lack of attachment

- **Neglect** – persistent hunger, poor hygiene, inappropriate clothing, lack of supervision, missed medical appointments
- **Sexual abuse** – knowledge/behaviour inappropriate for age, avoiding certain people, signs of trauma in play
- **Domestic/family violence** – hypervigilance, anxiety, aggression, frequent absences, disclosure by child or parent

All early childhood professionals (Educators, Coordinators, Nominated Supervisors, Approved Providers) are **mandatory reporters** under the *Children and Young People Act 2008*.

Educators may identify concerns from:

- **Observation:** Monitor physical appearance, behaviour, attendance, interactions, developmental progress
- **Conversations:** Listen carefully to what children say in play or directly
- **Patterns over time:** Repeated signs carry more weight than isolated incidents
- **Professional judgement:** Rely on training, policy, and guidance from the ACT Government guide **Keeping Children and Young People Safe**

Educators will respond to concerns by:

- **Ensuring immediate safety** – if a child is in immediate danger, call **000**
- **Documenting** – record concerns factually (what was seen/heard, date, time, witnesses). Avoid assumptions or judgmental language
- **Consulting** – discuss with the Nominated Supervisor/Coordinator
- **Using the “Keeping Children and Young People Safe”** guide –to determine whether the concern meets threshold for a child concern report
- **Reporting** – If required, call the **Child Protection Helpline 1300 556 729** or email childprotection@act.gov.au
- **Informing the family cautiously** – Do **not** confront parents if this may place the child at further risk. Seek guidance from the Coordinator or Child Protection Unit
- **Following Service policy**

Educators will support the Child by:

- Providing **emotional reassurance** – remain calm, supportive, and listen without pressing for details
- Maintaining **confidentiality** – only share **information** with those who need to know
- Continuing to monitor and document **observations**
- Where appropriate, linking families with **support** services (e.g., health, parenting programs, counselling)

(vii) ACT Reportable Conduct Scheme

The ACT Reportable Conduct Scheme addresses employment-related child protection within organisations in the ACT. The reportable conduct scheme is managed by the ACT Ombudsman.

Under the Scheme, the Service is required to:

- report allegations of child abuse and misconduct to the ACT Ombudsman
- develop policies and procedures to prevent and respond to child abuse

Broadly, 'reportable conduct' covers allegations or convictions of child abuse or misconduct toward children.

The reportable conduct scheme does not interfere with reporting obligations to ACT Policing or Child Protection Services or any other relevant professional bodies.

If the Service suspects criminal conduct has occurred, it should be reported to ACT Police in the first instance.

All Educators, Coordinators and staff are included in the scheme. Volunteers or contractors working with children are also covered under the scheme.

(a) Reportable Conduct:

The ACT Reportable Conduct Scheme defines reportable conduct as being:

- ill-treatment of a child (such as emotional abuse or use of force)
- neglect
- psychological harm
- misconduct of a sexual nature
- sexual or physical offences and convictions where a child is a victim or is present
- inappropriate discipline or not protecting children from harm.

(b) Reportable Conduct vs Mandatory Reporting:

Reportable conduct covers a broader range of conduct than the types of child abuse which can form the basis of a mandatory report to Child Protection Services.

This means that the **Service may have to report to the ACT Ombudsman** of allegations or conduct under the reportable conduct scheme, which is not required to be mandatorily reported Child Protection Services.

In the ACT, if there is reasonable grounds to believe that a child is experiencing or is at risk of sexual or non-accidental physical abuse it must be reported **mandatorily** to the ACT Child Protection Services.

Resources and Further Readings

- ACECQA (2023) Guide to the National Quality Framework
- ACECQA (2023) Policies and procedures guidelines: *Interactions with children policy and procedure guidelines*
- ACECQA (2023) Policies and procedures guidelines: *Providing a child safe environment policy and procedure guidelines*
- ACECQA (2023) Policies and procedures guidelines: *Policy and Procedure Guidelines for the Safe Use of Digital Technologies and Online Environments*
- ACECQA (2023) Information Sheets
- Education and Care Services National Law Act 2010 (Amended 2023)
- Education and Care Services National Regulations (Amended 2023)

- National Model Code for Early Childhood Education and Care
- ACT Child Safety Standards
- ACT Reportable Conduct Scheme

Related FDC Policies, Procedures & Documents

- Supervision & Hazard Prevention
- Incident, Injury, Trauma and Illness Procedures
- Medication Policy
- Dealing with Medical Conditions
- Excursions and Regular Outings

Last Reviewed: October 2025

Next Review: October 2026