



Together Growing Strong

Together Growing Strong Pty Ltd Child Safe Policy

This Policy complies with the Children and Young People (Safety) Act 2017 and the Child Safety (Prohibited Persons) Act 2016 to provide child safe environments. This policy has been adapted to reflect the size, nature and business of Together Growing Strong Pty Ltd.

Together Growing Strong Pty Ltd (TGS)

Child Safe Policy

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1. Commitment to the safety of children and young people

All children who work with Together Growing Strong have a right to feel and be safe. Together Growing Strong is committed to the safety and well-being of all children and young people accessing our services and the welfare of the children in our care will always be our priority. Together Growing Strong aims to create a child safe and child friendly environment where all children are valued and feel safe.

Children and young people are at the heart Together Growing Strong and a child safe culture is promoted at all levels of the organisation. We value and respect children and young people and welcome them regardless of their abilities, sex, gender, or social, economic or cultural background. Bullying and harassment won't be tolerated.

This policy was written to demonstrate the strong commitment of Together Growing Strong to child safety and establishing and maintaining a child safe and child friendly environment. It complies with the Children and Young People (Safety) Act 2017, Child Safety (Prohibited Persons) Act 2016 and aligns with the National Principles for Child Safe Organisations.

2. Scope

This policy, from the date of endorsement, applies to all people involved in the organisation, including:

- employees (permanent and casual)
- volunteers
- contractors
- sub-contractors
- work experience & university placement students

- indirect service providers
- any other individual involved in this organisation

Note: In this policy, the term “workers” is intended to cover all persons occupying any position listed above.

All workers are required to agree in writing to accept and act in accordance with this policy.

Note on Administrative Roles with No Child Contact:

Together Growing Strong Pty Ltd may engage administrative workers or contractors who do not have direct or indirect contact with children, such as overseas virtual assistants. In accordance with Section 6(1)(o) of the *Child Safety (Prohibited Persons) Act 2016 (SA)*, these roles are not considered “child-related work” as defined by the Act, and therefore a Working with Children Check (WWCC) is not required. However, all such workers are still required to agree to and act in accordance with this policy and undergo appropriate screening, such as a national police check in their country of residence and sign a confidentiality agreement.

3. Communication

This child safe policy and related documents are available on request and provided as part of a welcome pack at the first visit. This child safe policy and related documents are provided to all workers as part of their induction following recruitment. The child safe policy will be available on our newly designed website and several easy read versions of this policy are being created for children and young people to access.

We encourage and respect the views of children and young people and involve them in decision making as appropriate. We provide clear developmentally appropriate explanations to children and young people including their right to safety,

their right to be listened to and that they can provide feedback or make a complaint to any worker if they have a concern, or ask their parent/carer to do this on their behalf. We will listen to and act upon any complaints or concerns that a child or young person raises with us.

4. Code of Conduct

Caring for children and young people brings additional responsibilities for workers. A Code of Conduct sets out clearly what is acceptable behaviour, and what is

unacceptable. It sets a standard and clearly states that failure to comply will not be tolerated at TOGETHER GROWING STRONG.

All workers are responsible for promoting and protecting the safety and wellbeing of children and young people by:

- Always conforming to the Together Growing Strong child safe policy and taking all reasonable steps to ensure the safety and protection of children and young people.
- Treating everyone with respect and honesty, and ensuring equity is upheld for those of different race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes, and religious beliefs.
- Providing a welcoming, inclusive, and safe environment for all children and young people.
- Being a positive role model to children and young people in all conduct with them.
- Setting clear boundaries and maintaining appropriate behaviours with children and young people – boundaries help everyone to understand their roles.
- Listening and responding appropriately to the views and concerns of children and young people.
- Being alert to bullying behaviours and responding promptly and appropriately.
- Wherever practical, ensuring another adult is present or in sight when conducting individual sessions with children and young people. When this is not practical, ensuring that the door remains open and all windows are clear and visible to passers-by.

- Being alert to children and young people who have been harmed, or may be at risk of harm, and reporting this quickly to the Child Abuse Report Line (CARL: 13 14 78).
- Responding quickly, fairly and transparently to any complaints made by a child, young person or their parent/carer.
- Encouraging children and young people to 'have a say' on issues that are important to them.
- Providing appropriate and constructive feedback to children and young people, and their parents or carers.

Workers MUST NOT:

- Engage in rough physical games with children and young people.
- Develop any 'special' relationships with children and young people that could be seen as favouritism (such as the offering of gifts or special treatment).
- Do things of a personal nature that a child or young person can do for themselves (such as toileting or changing clothes).
- Discriminate against any child or young person because of age, gender, cultural background, religion, vulnerability or sexuality.
- Use any electronic device inappropriately or without authorisation.
- Exploit, bully or harass any person, including children and young people.
- Touch any person, including children and young people, in an inappropriate or culturally insensitive way.
- Use language or behaviour that is inappropriate, harassing, abusive, sexually provocative, demeaning, or culturally inappropriate.

Breaches or suspected breaches of the Code of Conduct should be reported as soon as practicable to the director either in person, by telephone on 0466-635-690,

or via email at togethergrowingstrongaustralia@gmail.com. Breaches or suspected breaches of the Code of Conduct will be taken seriously and dealt with quickly, fairly and transparently. Any worker who breaches the Code of Conduct will face disciplinary action and, depending on the severity of the breach, may have their employment terminated and SA Police informed.

5. Qualifications & Recruitment Practises

To ensure Together Growing Strong engages the most suitable and appropriate people to work with children and young people we have the following recruitment practices in place for workers who will have contact with children:

- Clear position descriptions include our commitment to child safety and wellbeing.
- Face-to-face interviews that use behavioural questions to determine the applicant's knowledge of child safeguarding.
- At least 2 referee checks and qualification checks.
- Require all staff to undertake NDIS Worker Screening.
- Require all staff to be maintain registration with their appropriate professional body.

In accordance with the Child Safety (Prohibited Persons) Act 2016, our organisation is registered with the DHS Screening Unit and we link all Working with Children Checks (WWCC) to our registration. All persons running the organisation (e.g. business owner, directors, managers etc) and all workers in the organisation over the age of 14 years, who will be working in a role with children and young people must hold a current, not prohibited WWCC issued by the Screening Unit of the Department of Human Services, provide evidence of this prior to employment and renew this every 5 years. We will verify the accuracy of all WWCCs in the DHS

Screening Unit portal as required by law.

We will immediately contact the Department of Human Services Screening Unit if we become aware of assessable information regarding any person involved with our organisation, including any serious criminal offence, child protection information, or disciplinary or misconduct information.

For administrative workers with no direct or indirect contact with children (e.g., virtual assistants), a DHS WWCC is not legally required under the *Child Safety (Prohibited Persons) Act 2016 (SA)*. Instead, the organisation will:

- Conduct appropriate screening (e.g., international police clearance where available),
- Require agreement to this Child Safe Policy, and
- Require a signed confidentiality and data protection agreement.

This ensures compliance with the intent of the legislation and the protection of client information, while recognising the legislative exemption for incidental or non-existent contact.

6. Training, Supervision, and Support for Workers

Together Growing Strong seeks to attract and retain the best workers. We provide support and supervision to ensure people feel valued, respected and fairly treated. We have strategies in place to supervise, train and support workers to understand our organisation's child safe policy, their mandatory reporting obligations, how to build culturally safe environments, and their responsibilities to create a child safe and friendly environment. Our strategies include:

- Training:

- As part of their induction, ensure all workers read and understand the Mandatory Reporting Information Booklet available at:
https://dhs.sa.gov.au/data/assets/pdf_file/0003/103179/CSE-Mandatory-notification-information-booklet.PDF
- Complete 'Safe Environments: Through Their Eyes' or 'Responding to Risk of Harm, Abuse and Neglect' training every 3 years.
- Include child safety as a standing item on meeting agendas.
- Supervision:
 - Regular supervision sessions that include a focus on child safety and wellbeing.
- Support:
 - An induction process for all new workers including a copy of this policy document.
 - Regular performance appraisals that discuss child safeguarding.
 - Appointing a child safety officer who has an educative role within our organisation.

7. Reporting and responding to harm or risk of harm

At Together Growing Strong we aim to ensure that children and young people are safe from harm and risk of harm. Section 17 of the Safety Act defines 'harm' to mean physical or psychological harm (whether caused by an act or omission), including harm caused by sexual, physical, mental or emotional abuse or neglect.

Mandated reporters in our organisation are workers who:

- Provide services to children and young people.
- Hold a management position in the organisation, the duties of which include direct responsibility for, or direct supervision of, the provision of those services to children and young people.

Mandated reporters have a legal obligation to notify the Child Abuse Report Line (CARL) on 13 14 78 as soon as practicable if they have a suspicion that a child or young person has been harmed or may be at risk of harm. If the child or young person is at immediate risk, report to South Australia Police (SAPOL) on 000 (triple zero).

Even if not a mandated reporter, any person can report harm or risk of harm to a child or young person. The non-mandated reporter who identifies the harm or risk of harm is encouraged to make the report to authorities and can request the support from another worker to do so if required.

Information about making appropriate reports of harm or risk of harm is available from the South Australian Department for Child Protection website:

<https://www.childprotection.sa.gov.au/reporting-child-abuse>

All adult workers (even if not a mandated reporter) have a legal obligation to report child sexual abuse by another worker to the police and to protect a child from sexual abuse by another worker. Failure to meet these obligations may be considered a criminal offence.

Following a report being made to CARL or SAPOL workers must make an internal report to management. We will be guided by the Department for Child Protection and/or SAPOL after a report has been made as to whether we can conduct an internal investigation.

If a worker is reported to CARL or SAPOL for causing harm or risk of harm to a child or young person, they will be removed from any role that involves working with any child or young person until authorities have concluded their investigation.

Following a report to CARL or SAPOL we will support the child or young person by:

- Referring the child, young person or their family to other appropriate

services.

- Continuing to provide a service to the child, young person and their family and monitor their circumstances.

We will document all information received regarding the report and store this securely in a separate file.

8. Reporting and responding to general complaints or feedback

Providing opportunities for complaints and feedback ensures that children, young people and their families feel valued and respected, and enables us to improve the quality of our service. Children, young people and their families are informed that they can provide feedback or make a complaint at their first appointment as part of their Service Agreement with Together Growing Strong Pty Ltd.

Compliments, complaints or feedback can be provided verbally to any worker or direct to management either by telephone on 0466-635-690 or via email at togethergrowingstrongaustralia@gmail.com. We will deal with all complaints and feedback received promptly, sensitively and fairly. We will ensure that:

- We listen to the complaint/feedback.
- The person receiving the complaint makes a record of it, if received verbally.
- Advise the time expected for an outcome.
- If a worker receives a complaint, they must forward it to management as soon as possible.
- Management will respond to the complainant with an outcome in a timely manner.
- Clearly document and securely store decisions and actions taken in response to complaints and feedback.

- Procedural fairness is followed at all times.

If the child, young person or their family is not happy with the outcome from the complaints process they can contact:

- The NDIS Quality and Safeguards Commission. Tel. 1800 035 544. Online: <https://www.ndiscommission.gov.au/contact-us/makeacomplaint>
- Health and Community Services Complaints Commissioner. Tel: 8226 8666
- Australian Human Rights Commission. Online: www.humanrights.gov.au Tel: 1300 656 419
- South Australian Equal Opportunities Commission (for complaints relating to discrimination) Online: www.eoc.sa.gov.au Tel: 08 8207 1977.

9. Risk Management

Policies and procedures address (but are not limited to):

Identified risk	Actions to minimise risk
Physical contact	<ul style="list-style-type: none"> ○ any physical contact must be appropriate to the delivery of services being provided ○ where physical contact is required, this is undertaken in a safe way by explaining why contact is required and what will happen, and asking the child/young person for their permission (or their family if this is more appropriate) before proceeding ○ unnecessary physical contact is not allowed

Online communications	<ul style="list-style-type: none"> ○ cyber safety and social media guidelines are in place and provided to all workers ○ appropriate supervision is provided for all online activities ○ workers must not communicate with children or young people via social media
Transport of children and young people	<ul style="list-style-type: none"> ○ workers must not transport a child or young person unless specifically approved ○ parents/guardians must provide consent before transporting a child or young person ○ workers must have a valid, unrestricted driver's licence ○ vehicle must be registered, insured and in roadworthy condition ○ workers must not be alone in a vehicle with a child or young person unless no other option is available, parents have given specific consent, and GPS tracking is enabled.

Supervision	<ul style="list-style-type: none"> ○ children and young people are to be supervised by an adult at all times ○ if a child or young person is not collected by their parent/carer at end of session, an adult is to stay with child/young person until they are collected ○ if providing one to one consultation with a child or young person, it will be in line of sight of another adult if this is at all practicable. When this is not practical the worker will ensure that the door remains open, and all windows are clear and visible to passers-by. ○ In the case of inappropriate behaviour or language of a child or young person, workers will act in accordance with the agreed Positive Behaviour Support policy and report the incident to the Director.
Taking images of children and young people	<ul style="list-style-type: none"> ○ consent of child or young person and their parent/carer required ○ disclosure will be made as to how the image is to be used and consent must be provided by the child, young person and parent/carer ○ images must be presented in a way that de-identifies the child or young person
Physical environment	<ul style="list-style-type: none"> ○ maintain a risk register that is reviewed annually to ensure effectiveness ○ conduct risk assessments for all activities ○ ensure all equipment is in good working order

<p>Privacy and confidentiality</p>	<ul style="list-style-type: none"> ○ all documents containing confidential information will be stored privately in a locked filing cabinet (or similar place with restricted access) ○ digital files containing confidential information shall be protected electronically by restricting the access to only those requiring it to perform their duties ○ workers must not disclose information regarding any child or young person without written consent of the child or young person and their parent/carer
<p>Overnight and/or off-site activities</p>	<ul style="list-style-type: none"> ○ consent of parent or guardian must be given ○ children and young people must be supervised by a minimum of 2 adults of the same gender as the children attending ○ privacy when children or young people are bathing, toileting and dressing must be provided ○ children and young people will not be left under the supervision of unauthorised persons ○ sleeping arrangements will not compromise the safety of children or young people such as unsupervised sleeping arrangements, or children or young people sharing a bed or an adult sleeping in the same bed as a child or young person ○ in the event of billeting arrangements, host adults should have a child or young person attending the same event from the same household, and have a not prohibited WWCC

	<ul style="list-style-type: none"> ○ children and young people have the right to contact their parents, or another adult, if they feel unsafe, uncomfortable, or distressed during the stay
Change room requirements	<ul style="list-style-type: none"> ○ supervision will be provided in a way that ensures the child or young person's right to privacy ○ adults must not shower or change whilst supervising children or young people ○ phones, cameras and recording devices must not be used in change room

Evaluation of these strategies and the development of additional strategies to minimise and control risks to children and young people occur as part of Together Growing Strong's ongoing risk management process.

10. Related policies and procedures

Policies that support Together Growing Strong's child-safe policy include:

- Employee Code of Conduct
- Client Intake Form
- Client Service Agreement
- Employee Handbook
- Employee Position Descriptions
- Incident Form

11. Policy Review


Together Growing Strong will, at a minimum, review this policy and the related procedures once every 5 years as required by the Children and Young People (Safety) Act 2017. We will also review this policy when:

- new or added risks are identified for children or young people, which may require a change in the policy or procedures
- there is a critical incident where a child or young person has experienced harm through involvement in the organisation
- concerns are raised by anyone involved in the organisation about child safety or welfare in the organisation
- awareness or compliance to the child safe policy and/or procedures is low
- legislative changes/requirements.

We will lodge a new child safe environments compliance statement with the Department of Human Services each time we review and update this policy.

Policy Date: 21/05/2025

Review Date: 21/05/2030 at the latest

Signed	Date	Review date
	21/05/2025	21/05/2030