



## CHILD SAFETY INFORMATION BOOKLET

### “KEEPING CHILDREN SAFE”

## TABLE OF CONTENTS

Introduction	3
Standards and Definitions	5
What is child Abuse	10
Vision, Mission and Values	14
Statement of Commitment	16
Child safety policy	18
Code of conduct	24

# CHILD SAFETY OVERVIEW

## Introduction

Positive Sullutions is committed to the safety, participation and empowerment of all children. To achieve this Positive Sullutions has developed child safety strategies to ensure that any person involved in working within our organisation is aware of their obligation and responsibilities for ensuring that all children are listened to, respected and safe.

The Victorian Government has 11 child safe standards in place to improve the way organisations that provide services for children prevent and respond to child abuse that may occur within their organisation.

The standards are compulsory for all organisations providing services to children, and aim to drive cultural change in organisations so that protecting children from abuse is embedded in the everyday thinking and practice of leaders, staff and volunteers. This will assist organisations to:

- Increase cultural safety for children
- Increase physical and online safety for children
- Prevent child abuse
- Encourage reporting of any abuse that does occur
- Improve responses to any allegations of child abuse.

## Standards and Definitions

Term	Definition
<b>The Act</b>	<i>Child Safety and Wellbeing Act 2005</i>
<b>Aboriginal child</b>	<p>A person under the age of 18 who:</p> <ul style="list-style-type: none"> <li>• is of Aboriginal or Torres Strait Islander descent</li> <li>• identifies as Aboriginal or Torres Strait Islander, and</li> <li>• is accepted as Aboriginal or Torres Strait Islander by an Aboriginal or Torres Strait Islander community.</li> </ul>
<b>Child abuse</b>	<p>For the purposes of these standards, abuse constitutes any act committed against a child involving:</p> <ul style="list-style-type: none"> <li>• physical violence</li> <li>• sexual offences</li> <li>• serious emotional or psychological abuse</li> <li>• serious neglect.</li> </ul> <p>Further explanation of these types of abuse is provided in the section 'What is child abuse?'</p>
<b>Children from culturally and/or linguistically diverse backgrounds</b>	<p>A child or young person who identifies as having particular cultural or linguistic affiliations by virtue of their place of birth, ancestry or ethnic origin, religion, preferred language or language spoken at home or because of their parents' identification on a similar basis.<sup>1</sup></p>
<b>Child</b>	A person who is under the age of 18 years.

---

<sup>1</sup> Victorian Government, *Cultural Responsiveness: Guidelines for Victorian Health Services* (2009)  
[http://www.health.vic.gov.au/\\_\\_data/assets/pdf\\_file/0008/381068/cultural\\_responsiveness.pdf](http://www.health.vic.gov.au/__data/assets/pdf_file/0008/381068/cultural_responsiveness.pdf)

<b>Child safety</b>	In the context of the child safe standards, child safety means measures to protect children from abuse.
<b>Child safe organisation</b>	In the context of the child safe standards, a child safe organisation is one that meets the child safe standards by proactively taking measures to protect children from abuse.
<b>Cultural competency</b>	A set of congruent behaviours, attitudes and policies that come together in a system, agency or among professionals that enable them to work effectively in cross-cultural situations. <sup>2</sup>
<b>Cultural abuse</b>	Actions and attitudes that deliberately ignore, denigrate or attack the culture of a person or community. <sup>3</sup>
<b>Cultural safety for Aboriginal children</b>	<p>The positive recognition and celebration of cultures. It is more than just the absence of racism or discrimination, and more than cultural awareness and cultural sensitivity.</p> <p>A culturally safe environment does not ignore, challenge or deny cultural identity. Cultural safety upholds the rights of Aboriginal children to:</p> <ul style="list-style-type: none"> <li>• identify as Aboriginal without fear of retribution or questioning</li> <li>• have an education that strengthens their culture and identity</li> <li>• maintain connections to their land and country</li> </ul>

<sup>2</sup> Aboriginal Cultural Competence Framework 2008:  
[http://www.dhs.vic.gov.au/\\_\\_data/assets/pdf\\_file/0011/580934/Aboriginal\\_cultural\\_competence\\_2008.pdf](http://www.dhs.vic.gov.au/__data/assets/pdf_file/0011/580934/Aboriginal_cultural_competence_2008.pdf)

<sup>3</sup> Aboriginal Cultural competence Framework 2008  
[http://www.dhs.vic.gov.au/\\_\\_data/assets/pdf\\_file/0011/580934/Aboriginal\\_cultural\\_competence\\_2008.pdf](http://www.dhs.vic.gov.au/__data/assets/pdf_file/0011/580934/Aboriginal_cultural_competence_2008.pdf)

	<ul style="list-style-type: none"> <li>• maintain their strong kinship ties and social obligations</li> <li>• be taught their cultural heritage by their Elders</li> <li>• receive information in a culturally sensitive, relevant and accessible manner</li> <li>• be involved in services that are culturally respectful.<sup>4</sup></li> </ul>
<b>Cultural safety for children from culturally and/or linguistically diverse backgrounds</b>	An environment which is spiritually, socially and emotionally safe, as well as physically safe for children; where there is no assault, challenge or denial of their cultural or linguistic identity, of who they are and what they need. <sup>5</sup> Efforts need to be made to ensure the culturally and/or linguistically diverse children and their families receive information in a culturally sensitive, relevant and accessible manner, including in relevant community languages.
<b>Children with a disability</b>	A disability can be any physical, sensory, neurological disability, acquired brain injury or intellectual disability or developmental delay that affects a child's ability to undertake everyday activities. <sup>6</sup> A disability can occur at any time in life. Children can be born with a disability or acquire a disability suddenly through an injury or illness. Some disabilities may be obvious while others are hidden. <sup>7</sup>

---

<sup>4</sup> Victorian Aboriginal Child Care Agency, 2010, *Building Respectful Partnerships*

<sup>5</sup> Williams, R. 1999, 'Cultural Safety – what does it mean for our work practice?', *Australian and New Zealand Journal of Public Health*, Vol 23, Issue 2, p213-214.

<sup>6</sup> s 3 *Disability Act 2006*.

<sup>7</sup> Department of Health and Human Services, [About disability](http://www.dhs.vic.gov.au/for-business-and-community/community-involvement/people-with-a-disability-in-the-community/disability-in-victoria/about-disability), <www.dhs.vic.gov.au/for-business-and-community/community-involvement/people-with-a-disability-in-the-community/disability-in-victoria/about-disability>

<b>Organisation<sup>8</sup></b>	<p>The <i>Child Safety and Wellbeing Act 2005</i> (the Act) will provide that the standards apply to 'applicable entities', which are defined in the Act as:</p> <ul style="list-style-type: none"> <li>• an incorporated body or association</li> <li>• an unincorporated body or association (however structured)</li> <li>• an individual who carries on a business and engages contractors, employees or volunteers to assist in the business in providing services or facilities.</li> </ul>
<b>Concerns and complaints</b>	<p>A concern refers to any potential issue that could impact negatively on the safety and wellbeing of children.</p> <p>A complaint is an expression of dissatisfaction to Positive Sullutions related to one or more of the following:</p> <ul style="list-style-type: none"> <li>• our services or dealings with individuals</li> <li>• allegations of abuse or misconduct by a staff member, a volunteer or another individual associated with Positive Sullutions</li> <li>• disclosures of abuse or harm made by a child or young person</li> <li>• the conduct of a child or young person at Positive Sullutions</li> <li>• the inadequate handling of a prior concern</li> <li>• general concerns about the safety of a group of children or activity.</li> </ul>

---

<sup>8</sup> An individual who carries on a business but does not engage contractors, employees or volunteers to assist in the business in providing services or facilities will be required to comply with the child safe standards when the individual belongs to a class prescribed by regulation.

## Child safe Standards:

- Standard 1:** Organisations establish a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal children and young people are respected and valued.
- Standard 2:** Child safety and wellbeing is embedded in organisational leadership, governance and culture.
- Standard 3:** Children and young people are empowered about their rights, participate in decisions affecting them and are taken seriously.
- Standard 4:** Families and communities are informed and involved in promoting child safety and wellbeing.
- Standard 5:** Equity is upheld and diverse needs respected in policy and practice.
- Standard 6:** People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
- Standard 7:** Processes for complaints and concerns are child-focused.
- Standard 8:** Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.
- Standard 9:** Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
- Standard 10:** Implementation of the Child Safe Standards is regularly reviewed and improved.
- Standard 11:** Policies and procedures document how the organisation is safe for children and young people.

## What is child abuse?

The child safe standards aim to protect children from abuse in organisations. Under the Act, child abuse includes five categories of abuse as outlined below.<sup>9</sup>

While the standards apply specifically to child abuse, child safe organisations also look to promote children's health and wellbeing in a broader sense and prevent harm.

Harm is defined as damage to the health, safety or wellbeing of a child or young person, including as a result of child abuse by adults or the conduct of other children. It includes physical, emotional, sexual and psychological harm. Harm can arise from a single act or event and can also be cumulative, that is, arising as a result of a series of acts or events over a period of time.

### Physical violence

Physical violence occurs when a child suffers or is likely to suffer significant harm from a non-accidental injury or injuries inflicted by another person. Physical violence can be inflicted in many ways, including beating, shaking, burning or use of weapons (such as, belts and paddles).

Possible physical indicators:

- Unexplained bruises
- Burns and/or fractured bones

Possible behavioural indicators:

- Showing wariness or distrust of adults
- Wearing long sleeved clothes on hot days (to hide bruising or other injury)
- Fear of specific people
- Unexplained absences

---

<sup>9</sup> These definitions are based on the Victorian [Child Protection Practice Manual](http://www.dhs.vic.gov.au/cpmanual/practice-context/child-protection-program-overview/1008-abuse-and-harm-legal-and-practice-definitions):  [<www.dhs.vic.gov.au/cpmanual/practice-context/child-protection-program-overview/1008-abuse-and-harm-legal-and-practice-definitions>](http://www.dhs.vic.gov.au/cpmanual/practice-context/child-protection-program-overview/1008-abuse-and-harm-legal-and-practice-definitions)

- Academic problems

## Sexual offences

Sexual offences occur when a person involves the child in sexual activity, or deliberately puts the child in the presence of sexual behaviours that are exploitative or inappropriate to his/her age and development. Child sexual abuse can involve a range of sexual activity including fondling, masturbation, penetration, voyeurism, sexual grooming (including normalising age inappropriate sexual activities) and exhibitionism. It can also include exposure to or exploitation through pornography or prostitution, as well as grooming behaviour.<sup>10</sup>

Possible physical indicators:

- Presence of sexually transmitted diseases
- Pregnancy
- Vaginal or anal bleeding or discharge

Possible behavioural indicators:

- Displaying sexual behaviour or knowledge that is unusual for the child's age
- Difficulty sleeping
- Being withdrawn
- Complaining of headaches or stomach pains
- Fear of specific people
- Showing wariness or distrust of adults
- Displaying aggressive behaviour

---

<sup>10</sup> A new grooming offence commenced in Victoria on 9 April 2014. Further information is available on the [Department of Justice website](http://www.justice.vic.gov.au/home/safer+communities/protecting+children+and+families/grooming+offence) <[www.justice.vic.gov.au/home/safer+communities/protecting+children+and+families/grooming+offence](http://www.justice.vic.gov.au/home/safer+communities/protecting+children+and+families/grooming+offence)>

## Serious emotional or psychological abuse

Serious emotional or psychological abuse occurs when harm is inflicted on a child through repeated rejection, isolation, or by threats or violence. It can include derogatory name-calling and put-downs, or persistent and deliberate coldness from a person, to the extent where the behaviour of the child is disturbed or their emotional development is at serious risk of being impaired. Serious emotional or psychological abuse could also result from conduct that exploits a child without necessarily being criminal, such as encouraging a child to engage in inappropriate or risky behaviours.

Possible physical indicators:

- Delays in emotional, mental, or even physical development
- Physical signs of self-harming

Possible behavioural indicators:

- Exhibiting low self-esteem
- Exhibiting high anxiety
- Displaying aggressive or demanding behaviour
- Being withdrawn, passive and/or tearful
- Self-harming

## Serious neglect

Serious neglect is the continued failure to provide a child with the basic necessities of life, such as food, clothing, shelter, hygiene, medical attention or adequate supervision, to the extent that the child's health, safety and/or development is, or is likely to be, jeopardised. Serious neglect can also occur if an adult fails to adequately ensure the safety of a child where the child is exposed to extremely dangerous or life threatening situations.

Possible physical indicators:

- Frequent hunger

- Malnutrition
- Poor hygiene
- Inappropriate clothing

Possible behavioural indicators:

- Stealing food
- Staying at school outside of school hours
- Aggressive behaviour
- Misusing alcohol or drugs
- Academic issues

**Police will be called if immediate concerns for a child's safety are present.**

Information about child protection services can be found on the [Department of Health and Human Services website](https://www.dhs.vic.gov.au/for-individuals/crisis-and-emergency/reporting-child-abuse)  
<[www.dhs.vic.gov.au/for-individuals/crisis-and-emergency/reporting-child-abuse](https://www.dhs.vic.gov.au/for-individuals/crisis-and-emergency/reporting-child-abuse)>

## Vision statement

Positive Sullutions' vision is to assist parents, carers and individuals impacted by disability to understand and work through challenges in their day to day life. We aim to improve the overall wellbeing and functioning of the individual and their family unit by delivering accessible and evidence based psychological services to our clients.

## Mission statement

Positive Sullutions delivers psychological services that foster understanding of individual needs, strengths and areas for growth and how to incorporate, develop and accommodate these aspects into the family and wider community. This is achieved through a continual focus on quality and a continuing commitment to incorporating new advances in the field into our practice.

Positive Sullutions is committed to working with those impacted by disability as well as those who have concerns relating to development or mental wellbeing. We provide a flexible approach to service delivery that caters to family's needs.

## Our values

**Respect** – We treat all people with equality, dignity and respect, whatever their age, culture, disability, gender, belief or sexual orientation.

**Participation** – We work to incorporate all individuals involved in a client's network to achieve the best possible outcomes for children and their family.

**Relationship** – We take a person and family centred approach to identify needs, areas of improvement and ways of addressing them.

**Collaboration** – we are dedicated to ensuring collaboration in our work with children and families to achieve the best outcome for the clients we work with.

**Independence** – we work towards making families feel in control of their lives enhancing sense of self-worth and quality of life for the family as a whole



## Statement of commitment to child safety

We are committed to the safety (both physically and online), equity, participation and empowerment of all children. Positive Sullutions is committed to the cultural safety of First Nations children, the cultural safety of children from culturally and/or linguistically diverse backgrounds and to providing a safe environment for children with a disability. Further to this Positive Sullutions is committed to supporting, and training families and their networks to facilitate the safety of children accessing our service.

Positive Sullutions have specific policies, procedures and training in place that support all staff to achieve these commitments.

Positive Sullutions is committed to:

- A zero tolerance for child abuse, neglect and exploitation.
- Actively listening to and empowering children
- Having systems to protect children from abuse, and taking all allegations and concerns very seriously and responding to them consistently in line with the organisation's policies and procedures
- Ensuring appropriate training and qualifications to facilitate child safety
- Promoting cultural safety for Aboriginal children, cultural safety for children from culturally and/or linguistically diverse backgrounds, and to providing a safe environment for children with a disability.

## Our commitment to child safety

Positive Sullutions is committed to child safety.

We want all children to be safe, happy and empowered. We support and respect all children, as well as our staff and volunteers.

We are committed to the safety, participation and empowerment of all children in a safe and culturally sensitive environment.

We have zero tolerance of child abuse, exploitation or neglect, and all allegations and safety concerns will be treated very seriously and consistently with our robust policies and procedures.

We have legal and moral obligations to contact authorities when we are worried about a child's safety, which we follow rigorously.

Our organisation is committed to preventing child abuse and identifying risks early, and removing and reducing these risks.

Our organisation has robust human resources and recruitment practices for all staff and volunteers.

Our organisations is committed to regularly training and educating our staff and volunteers on child abuse risks.

We support and respect all children, as well as our staff and volunteers. We are committed to the cultural safety of Aboriginal children, the cultural safety of children from culturally and/or linguistically diverse backgrounds, and to providing a safe environment for children with a disability.

We have specific policies, procedures and training in place that support our leadership team, staff and volunteers to achieve these commitments.

**If we believe a child is at immediate risk of abuse we will contact emergency services.**

# Child Safety Policy

## Scope

This policy guides Positive Sullutions staff and volunteers on how to behave with children in or involved in our organisation. This policy applies to all services conducted by Positive Sullutions.

All of our staff and volunteers must agree to abide by our code of conduct which specifies the standards of conduct required when working with children.

## Our children

This policy is intended to empower children who are vital and active participants of Positive Sullutions. We let them know their rights and involve them when making decisions, especially about matters that directly affect them. We listen to their views and respect what they have to say. We do not tolerate bullying or abusive behaviour between children and take action if this occurs. We actively seek to understand what makes children feel safe in our organisation. We regularly communicate with children about what they can do if they feel unsafe.

We promote diversity and tolerance in Positive Sullutions, and people from all walks of life and cultural backgrounds are welcome. In particular we:

- promote the cultural safety, participation and empowerment of Aboriginal children
- promote the cultural safety, participation and empowerment of children from culturally and/or linguistically diverse backgrounds
- ensure that children with a disability are safe and can participate equally.

## Our Families

Positive Sullutions recognises the important role of families and involves parents and carers when making significant decisions about their child. Parents, families and communities are welcome to provide feedback at any time through

our contact email address and are encouraged to raise any concerns they have with us.

Positive Sullutions provides information to families and community about our child safe policies and practices including through:

- publishing this Child Safety and Wellbeing Policy and Code of Conduct on our website
- including information about our feedback and complaints process in the Positive Sullutions carer information booklet
- including information and training on child safety and wellbeing to parents and carers in our reception space and through webinars and parent sessions.

## Creating culturally safe environments for all Aboriginal children and their families

Positive Sullutions is committed to creating environments where Aboriginal culture is celebrated and Aboriginal children, families and community members are welcomed and included. Strategies to embed cultural safety for Aboriginal children include:

- an Acknowledgement of Country at all meetings
- Providing an environment that celebrates Aboriginal culture through artwork and language.
- providing opportunities for children to share their cultural identity and express their culture during Positive Sullutions community activities
- supporting children who wish to explore their culture, including consulting with their family and relevant Aboriginal organisations
- providing training for staff and volunteers on the strengths of Aboriginal culture and its importance to the wellbeing and safety of Aboriginal children
- celebrating NAIDOC Week and acknowledging significant events including National Sorry Day and National Reconciliation Week
- seeking feedback from Aboriginal children, families and communities on their experience at Positive Sullutions, particularly how safe they feel expressing their identity including their culture.

## Valuing diversity

Positive Sullutions values diversity and equity for all children. To achieve this, we:

- provide training for all staff and volunteers on understanding diversity and how to support inclusion and cultural safety
- welcome and support participation of all children, including children with disability, children from culturally and linguistically diverse backgrounds, those who are unable to live at home, LGBTIQ children and Aboriginal children and their families
- offer children and families through our enrolment forms the opportunity to provide information about themselves, including any specific needs to participate fully in our services
- have zero tolerance of racism and other forms of discrimination and take action when discrimination or exclusion is identified
- deliver services that reflects the diversity of our clients, their interests and cultures
- have a physical and online environment that actively celebrates diversity
- commit to ensuring our facilities and online activities promote inclusion of children of all abilities.

## Training and supervision

Training and education is important to ensure that everyone in our organisation understands that child safety is everyone's responsibility.

Positive Sullutions culture aims for all staff and volunteers (in addition to parents/carers and children) to feel confident and comfortable in discussing any allegations of child abuse or child safety concerns. We train our staff and volunteers to identify, assess, and minimise risks of child abuse and to detect potential signs of child abuse. All Positive Sullutions staff and volunteers are required to complete child safety training with evidence of this kept on file.

We also support our staff and volunteers through ongoing supervision to: develop their skills to protect children from abuse; and promote the cultural

safety of Aboriginal children, the cultural safety of children from linguistically and/or diverse backgrounds, and the safety of children with a disability.

New employees and volunteers will be supervised regularly to ensure they understand our organisation's commitment to child safety and that everyone has a role to play in protecting children from abuse, as well as checking that their behaviour towards children is safe and appropriate (please refer to Positive Sullutions code of conduct to understand appropriate behaviour further). Any inappropriate behaviour will be reported through appropriate channels, including the Child Protection, NDIS commissioner, Psychology board of Australia and Victoria Police, depending on the severity and urgency of the matter.

## Role of the Child Safety Officer

The Child Safety Officer has the role of making sure Positive Sullutions prioritises children's safety and that action is taken when anyone raises concerns about children's safety.

They will champion and model a child safe culture at Positive Sullutions. The Child Safety Officer will work to create a positive culture around reporting so that people feel comfortable to raise concerns.

Everyone at Positive Sullutions has a role in identifying and managing risks of child abuse and harm. The Child Safety Officer will make sure that staff and volunteers are conducting risk assessments and taking action to manage risks in accordance with this policy. They will also ensure that appropriate child safety training for staff and volunteers is identified and completed.

The Child Safety Officer will participate in annual reviews of child safety practices and this policy. The input of people involved with Positive Sullutions will be sought as part of this review.

## Recruitment

We take all reasonable steps to employ skilled people to work with children. We develop selection criteria and advertisements which clearly demonstrate our commitment to child safety and an awareness of our social and legislative responsibilities. Positive Sullutions understands that when recruiting staff and volunteers we have ethical as well as legislative obligations.

We actively encourage applications from Aboriginal people, people from culturally and/or linguistically diverse backgrounds and people with a disability.

All people engaged in child-related work, including volunteers, are required to hold a Working with Children Check and provide evidence of this Check. Please see the [Working with Children Check](http://www.workingwithchildren.vic.gov.au) website

<[www.workingwithchildren.vic.gov.au](http://www.workingwithchildren.vic.gov.au)> for further information further to this all staff hold a NDIS worker screener check. We require staff to have appropriate qualifications for their roles and check to make sure these qualifications are valid. In addition, all staff are required to complete and provide a copy of their NDIS Worker Orientation Completion Certificate.

Positive Sullutions carry out reference checks to ensure that we are recruiting the right people. We retain our own records if an applicant's criminal history affected our decision making process.

If during the recruitment process a person's records indicates that they are not fit to be employed to work with vulnerable clientele including children then their application will not proceed.

All staff are required to work in accordance to Positive Sullutions child safe code of conduct. Breaches of the Code of Conduct may result in disciplinary action including termination of a person's involvement with the organisation. Staff and volunteers may be subject to actions to support child safety including:

- being stood down during an investigation or terminated following an investigation
- having their duties altered so they do not engage with children at Positive Sullutions
- not allowing unsupervised contact with children at Positive Sullutions
- removing their access to the Positive Sullutions IT system and facilities.

All third-party contractors are also expected to abide by the Child Safe Code of Conduct, and where they are engaging with children will have to sign an agreement to comply with the code, prior to delivering any services.

## Fair procedures for personnel

The safety and wellbeing of children is our primary concern. We are also fair and just to personnel. The decisions Positive Sullutions make when recruiting, assessing incidents, and undertaking disciplinary action will always be thorough, transparent, and based on evidence.

Positive Sullutions record all allegations of abuse and safety concerns using our incident reporting form, including investigation updates. All records are securely stored.

If an allegation of abuse or a safety concern is raised, we provide updates to children and families on progress and any actions we, as an organisation, take.

## Privacy and Record Keeping

All personal information considered or recorded will respect the privacy of the individuals involved, whether they be staff, volunteers, parents or children, unless there is a risk to someone's safety. We have safeguards and practices in place to ensure any personal information is protected. Everyone is entitled to know how this information is recorded, what will be done with it, and who will have access to it.

Positive Sullutions is committed to making and keeping full and accurate records about all child-related complaints or safety concerns.

All child safety complaints, concerns, incidents and near misses will be recorded in the incident reporting system.

Records which may assist with the investigation of a complaint or safety concern will be identified and kept as part of the record of an investigation. Records will be kept even if an investigation does not substantiate a complaint.

We will record and keep the outcome of any investigations, and the resolution of any complaints. This includes findings made, reasons for decisions and actions taken.

Records will be stored securely and kept by Positive Sullutions for at least 45 years.

## Legislative Responsibilities

Positive Sullutions takes legal responsibilities seriously, including:

- **Failure to disclose:** Reporting child sexual abuse is a community-wide responsibility. All adults in Victoria who have a reasonable belief that an adult has committed a sexual offence against a child under 16 have an obligation to report that information to the police.<sup>11</sup>
- **Failure to protect:** People of authority in our organisation will commit an offence if they know of a substantial risk of child sexual abuse and have the power or responsibility to reduce or remove the risk, but negligently fail to do so.<sup>12</sup>
- Any personnel who are **mandatory reporters** must comply with their duties.<sup>13</sup>

---

<sup>11</sup> A person will not commit this offence if they have a reasonable excuse for not disclosing the information, including a fear for their safety or where the information has already been disclosed. Further information about the failure to disclose offence is available on the [Department of Justice and Regulation website](http://www.justice.vic.gov.au/home/safer+communities/protecting+children+and+families/failure+to+disclose+offence) <[www.justice.vic.gov.au/home/safer+communities/protecting+children+and+families/failure+to+disclose+offence](http://www.justice.vic.gov.au/home/safer+communities/protecting+children+and+families/failure+to+disclose+offence)>.

<sup>12</sup> Further information about the failure to protect offence is available on the [Department of Justice and Regulation website](http://www.justice.vic.gov.au/home/safer+communities/protecting+children+and+families/failure+to+protect+offence) <[www.justice.vic.gov.au/home/safer+communities/protecting+children+and+families/failure+to+protect+offence](http://www.justice.vic.gov.au/home/safer+communities/protecting+children+and+families/failure+to+protect+offence)>.

<sup>13</sup> Mandatory reporters (doctors, nurses, midwives, psychologists, teachers (including early childhood teachers), principals and police) must report to child protection if they believe on reasonable grounds that a child is in need of protection from physical injury or sexual abuse.

See the Department of Health and Human Services website for information about [how to make a report to child protection](#)

## Information Sharing

Positive Sullutions may share relevant information to promote the safety and wellbeing of children, where it is appropriate and in their best interests.

Positive Sullutions will keep information about complaints confidential, except where it is necessary to share information to respond properly to a complaint or to prioritise child safety. We may also need to share information about incidents or complaints with external authorities to comply with the law or to prioritise safety.

More information is available in our feedback, suggestion and complaints policy & procedure

## Risk management

In Victoria, organisations are required to protect children when a risk is identified (see information about failure to protect above). In addition to general occupational health and safety risks, we proactively manage risks of abuse to our children.

We have risk management strategies in place to identify, assess, and take steps to minimise child abuse risks, which include risks posed by physical environments (for example, any doors that can lock), and online environments (for example, no staff or volunteer is to have contact with a child in organisations on social media).

## Allegations, concerns and complaints

Positive Sullutions takes all allegations seriously and has practices in place to investigate thoroughly and quickly. Our staff and volunteers are trained to deal appropriately with allegations in line with our *feedback, suggestion and*

---

[www.dhs.vic.gov.au/about-the-department/documents-and-resources/reports-publications/guide-to-making-a-report-to-child-protection-or-child-first](http://www.dhs.vic.gov.au/about-the-department/documents-and-resources/reports-publications/guide-to-making-a-report-to-child-protection-or-child-first).

*complaints policy & procedure*. Information about how to make a complaint is provided to families through our information booklet and displayed visually in the clinic.

We work to ensure all children, families, staff and volunteers know what to do and who to tell if they observe abuse or are a victim, and if they notice inappropriate behaviour.

We all have a responsibility to report an allegation of abuse if we have a reasonable belief that an incident took place (see information about failure to disclose above).

Positive Sullutions values the voices of children and will act on safety concerns raised by children or their families. Positive Sullutions supports children's participation in the following ways:

- Regular discussions with children, including child-led conversations on what makes them feel safe and unsafe.
- A suggestion box for children that is regularly emptied with suggestions assessed and acted on where appropriate. Children are provided with feedback on their suggestions.
- Consultation with children about any proposed significant changes to the physical environment, policies, procedures, programs or staffing. Children's views are collected by staff, provided to management and considered in the decision-making process.
- Information provided to children and families about Positive Sullutions operations, staffing and programs are made suitable for different age groups and diversity of the children.

Complaints can be emailed to [admin@positivesullutions.com](mailto:admin@positivesullutions.com) or children and their networks can speak with any staff, their practitioner or the Child Safety Officer. Anonymous complaints can be lodged in writing in clinic (using the feedback box) or via the website.

If there is concern for the immediate safety of a child, immediately call 000.

## Regular review

This policy will be reviewed at least every 2 years and following significant incidents or identified “near misses” if they occur. We will ensure that families and children have the opportunity to contribute. Where possible we do our best to work with local Aboriginal communities, culturally and/or linguistically diverse communities and people with a disability.

## Supporting documents – Positive Sullutions child safety and wellbeing system

The following policies and procedures work together to support child safety and wellbeing across all of our operations:

- Keeping Children Safe SERVPOL01/ Current Doc.
- Positive Sullutions Code Of Conduct HRPOL-04
- Feedback, Suggestion And Complaints Policy & Procedure SERVPOL-02
- Human Resources; Employment, Orientation And Professional Development Policy & Procedure HRPRO-01
- Employee Orientation Manual HRPOL -02
- Governance And Organisational Risk Policy OPEPOL-03
- Quality Audit Register

## Supporting legislation

- Child Wellbeing and Safety Act 2005 (Vic) (including Child Safe Standards)
- Children, Youth and Families Act 2005 (Vic) (including reporting to Child Protection)
- Crimes Act 1958 (Vic) (including Failure to Protect and Failure to Disclose offences)
- Wrongs Act 1958 (Vic) (including Part XIII – Organisational liability for child abuse)

Creation/revision date	Comment	Who
July 2019	Policy created	Veronica Sullivan
July 2020	Reviewed	Veronica Sullivan
July 2023	Reviewed	Veronica Sullivan