

Epic Disability Services Pty Ltd T/AS Our PACC (ACN 646 591 406)  
("Organisation")

***Date of approval: 8th January 2024***

## **(1) PURPOSE OF THIS POLICY**

*At Epic Disability Services Pty Ltd T/AS Our PACC (we, our, us), we are committed to the safety of children and young people. We are committed to providing an environment which is safe for children and youths, and to ensuring that this is reflected in all aspects of our business operations.*

*This Child Safety Policy (Policy) sets out the general principles that guide the management of child and youth safety at Epic Disability Services Pty Ltd T/AS Our PACC.*

*We have developed this Policy to help our Workers understand and manage child and youth safety, and to set a framework to ensure that we provide a safe environment for children and young people, and that we meet all of our objectives and comply with all of our legal and regulatory obligations in relation to these matters.*

## **(2) STATUS OF THIS POLICY**

This Policy does not form part of any contract of employment or any other contract for work or services.

## **(3) APPLICABLE RULES**

(a) We are committed to complying with all applicable laws and regulations as well as codes of practice and other safety guidance in all jurisdictions where we operate. This policy complies with the legislation set out below:

- *Family Law Act 1975 (Commonwealth)*
- *Children and Young People (Safety) Act 2017 (SA)*
- *Child Safety (Prohibited Persons) Act 2016 (SA)*

(b) This policy may also comply with the following external policies, standards, codes of practice or safety guidance:

National Principles for Child Safe Organisations

## **(4) NATIONAL PRINCIPLES FOR CHILD SAFE ORGANISATIONS**

(a) We support the *National Principles for Child Safe Organisations* (National Principles) and will endeavour to embrace them at our Organisation. This policy aligns with the National Principles.

(b) The National Principles require that:

- 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 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 national child safe principles is regularly reviewed and improved.*
- 10. Policies and procedures document how the Organisation is safe for children and young people.*

## **(5) WHO THIS POLICY APPLIES TO**

This Policy applies to any people who perform work for Epic Disability Services Pty Ltd T/AS Our PACC, including all our directors, managers, board members, employees, contractors, subcontractors, employees of our contractors and subcontractors, apprentices, trainees, volunteers, interns, work experience students, labour hire employees and outworkers and any other people who perform work for or on behalf of our Organisation (Workers).

(a) We are committed to ensuring the safety and wellbeing of all Workers and visitors to our Organisation. However, this Policy specifically addresses our commitment to the safety and wellbeing of youths and children at our Organisation. Throughout this Policy, we use the terms "youth", "young person", "child" and "children" to refer generally to people under 18 years of age.

(b) This Policy applies to all activities in our Organisation which involve children, or which result in or relate to contact with children.

(c) This Policy is intended to help manage the safety and wellbeing of any children that come into contact with our Organisation, whether they are receiving services from us, are the children of someone who is receiving services from us, are the children of our Workers, or come into contact with us in any other way.

(d) We require all Workers to sign a copy of this Policy to agree in writing that they accept and will act in accordance with this Policy.

## **(6) OUR COMMITMENT TO THE SAFETY OF CHILDREN AND YOUNG PEOPLE**

(a) We are committed to the safety of children and young people.

(b) We are committed to providing an environment which is safe for children and youths, and to ensuring that this is reflected in all aspects of our business operations.

(c) We value and respect children and young people and welcome them regardless of their abilities, age, sex, gender, or social economic or cultural background.

(d) Bullying and harassment will not be tolerated at Epic Disability Services Pty Ltd T/AS Our PACC.

(e) Safeguarding children from harm and risk of harm is an essential responsibility for our Organisation. We are committed to ensuring that any child who comes into contact with our Organisation or services is properly safeguarded. Every person under this policy must ensure that they play an active role in ensuring that children are properly safeguarded.

(f) We believe that no child or young person should experience harm or risk of harm, and we are committed to the protection of children and young people. This policy is intended to provide guidance and overarching principles to those who represent us as workers, to guide our approach to child protection and safeguarding.

(g) It is our intention that a child safe culture should be embedded in all levels of our Organisation, including but not limited to our leadership and governance as well as amongst all of our other Workers.

(h) When dealing with concerns about a child's safety or wellbeing, we are guided by a consideration of what is in the best interests of the child.

(i) We strive to:

- ensure that our Workers have the knowledge, skills and awareness to keep children safe

- ensure that any of our Workers who work with children have the necessary skills, attributes, experience and qualifications to uphold this

Policy and provide the support and supervision that children require

- ensure that any children who come into contact with our Organisation and who have concerns about their safety or need assistance know where to go and who to talk to

- ensure that any children who come into contact with our Organisation and who have concerns about their safety feel comfortable seeking assistance

- maintain the safety and security of any of our facilities or environments which may be accessed by children (including any online facilities or environments, websites or platforms)

- promote a workplace which values diversity and inclusion

- where appropriate, involve children and their families in decisions that affect them

- promote a culture of child safety at all levels in our Organisation

- take any allegations or complaints in relation to child safety seriously, and respond promptly and appropriately

- report any allegations or concerns to relevant authorities whenever appropriate or necessary

## **(7) OUR COMMITMENT TO SUPPORTING THE DIVERSE AND UNIQUE IDENTITIES OF CHILDREN AND YOUNG PEOPLE**

(a) We are committed to providing a culturally safe environment in which the diverse and unique identities and experiences of all children and young people are respected and valued.

(b) We actively encourage and support children's abilities to express their culture and identity, and to exercise their cultural rights.

(c) All children and young people are embraced regardless of their abilities, sex, gender, or social economic or cultural background and equity is upheld.

(d) We adopt measures to ensure that racism is identified, confronted, and not tolerated within our organisation. Any instances of racism are addressed with appropriate consequences.

(e) We actively support and facilitate the participation and inclusion of all children, young people, and their families within our organisation.

(f) All of our policies, procedures, systems, and processes work together to create a culturally safe and inclusive environment that meets the needs of all children and young people regardless of their abilities, sex, gender, social economic or cultural background.

(g) Our Workers must encourage and support children to freely express their culture and enjoy their cultural rights.

(h) Workers must actively support and facilitate the participation and inclusion of all children and their families within our Organisation.

(i) Racism is strictly prohibited within our Organisation. If racism occurs, we will respond as follows:

*Anyone experiencing racism will be offered free counselling and consultations with our Business Manager. Penalties may include termination of employment and referral to relevant authorities.*

(j) Our leadership has a responsibility to help everyone involved with our Organisation to acknowledge and appreciate the strengths of diverse backgrounds and to understand its importance to the wellbeing and safety of children and young people.

## **(8) CODE OF CONDUCT**

(a) We have a code of conduct for working with children and young people, as set out below ("Code of Conduct"). We expect all Workers to understand this Code of Conduct, and ask a Responsible Person if they need more information or have any questions.

(b) Caring for children and young people brings additional responsibilities for our Workers. All Workers are responsible for promoting and protecting the safety and wellbeing of children and young people by:

- sticking to the organisation's child safe policy at all times and taking all reasonable steps to ensure the safety and protection of children and young people
- treating everyone including those of different race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes and religious beliefs with respect and honesty and ensure equity is upheld
- being a positive role model to children and young people in all conduct with them
- setting clear boundaries about appropriate behaviour between yourself and 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
- ensuring another adult is always present or in sight when conducting

one to one consulting, coaching, instruction or other activity

- 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 (13 14 78)

- responding quickly, fairly and transparently to any complaints made by a child, young person or their parent/guardian

- encouraging children and young people to 'have a say' on issues that are important to them.

(c) Workers must not:

- engage in rough physical games

- 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.

(d) Breaches or suspected breaches of the Code of Conduct must be reported as soon as practicable to management either in person or using the contact details provided at the end of this policy in *Section 30 Other Information*.

(e) Breaches or suspected breaches of the Code of Conduct will be taken seriously and dealt with quickly, fairly, and transparently.

(f) Any Worker who breaches the Code of Conduct will face disciplinary action and depending on severity of the breach, the Worker may have their employment terminated.

## **(9) GENERAL WORKER RESPONSIBILITIES**

(a) Our Workers must uphold our Organisation's values in accordance with this Policy. Our Workers must demonstrate behaviour which is consistent with this

Policy and with our Organisation's values. Our Workers must be proactive about upholding and promoting our values and this Policy, including by doing the following:

- remaining alert and aware of possible safeguarding risks to children

- guarding children against harmful environments with appropriate actions (for example, adequate supervision or ensuring safe

environments)

- taking positive steps to maintain the safety and wellbeing of children engaging with our Organisation
- reporting concerns expeditiously and appropriately, in line with child protection procedures
- understanding the duty to report specific concerns (and understanding how this interplays with confidentiality)
- challenging any inappropriate or harmful behaviour of any other adult and reporting this accordingly
- acting appropriately in the presence of children
- not taking any inappropriate risks
- not smoking, drinking or taking any form of illicit substances in the presence of children
- ensuring that any children who come into contact with our Organisation or access our services understand their rights and responsibilities
- communicating with children clearly and respectfully and using language which they can understand and which is appropriate for their age and level of development
- ensuring that any children who come into contact with our Organisation or access our services are supported and get any necessary assistance with exercising their rights and responsibilities

(b) Our Workers are responsible for ensuring that they personally comply with all applicable laws in the state or territory where they are based including any applicable Commonwealth laws.

## **(10) KEY CHILD SAFETY PERSONNEL**

The management and oversight of all child safeguarding matters is allocated to the following people (the Responsible Persons):

The respective managers.

## **(11) THE RISKS TO CHILDREN**

(a) Children can be vulnerable to different forms of harm. It is important to recognise that harm and risk of harm of children can cover a wide range of circumstances and behaviours. For example, children can be at risk of:

- physical or emotional harm

- neglect
- sexual abuse
- female genital mutilation (FGM)
- grooming and exploitation
- trafficking and modern slavery
- exposure to or infliction of domestic abuse
- bullying or cyber bullying
- exposure to other inappropriate content or behaviour, such as violence or criminal behaviour
- self-harm
- physical harm when engaging with activities without adequate supervision

(b) The causal factors of any such harm and/or risk of harm can also be wide-ranging. For example, children can be placed at risk by anyone including workers, family members or by members of the community.

## **(12) RECRUITMENT**

(a) In accordance with applicable legislation, we require that any Workers who work with children or young people have a current, "not prohibited" Working with Children Check in all relevant jurisdictions.

(b) To ensure we engage the most suitable people to work with children and young people we have the following recruitment practices in place:

- our commitment to child safety is included in all job advertisements
- clear position descriptions that include our commitment to child safety and wellbeing
- written applications from applicants
- 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.

(c) In accordance with the *Child Safety (Prohibited Persons) Act 2016*, our organisation is registered with South Australia's Department of Human Services (DHS) Screening Unit and we link all Working with Children Checks. All workers who will be working in a role with children and young people must hold a current, not prohibited Working with Children Check (WWCC) issued by the DHS Screening Unit and 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.

(d) We will immediately contact the DHS Screening Unit when we become aware of certain information regarding any person involved with our organisation, including any serious criminal offence, child protection information, or disciplinary or misconduct information.

We strive to ensure that Workers at our Organisation who are working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice. We use a variety of procedures relating to recruitment, staff development, screening, induction and supervision to do this.

### **(13) CONFIDENTIALITY AND DATA PROTECTION**

All personal information we may process relating to children, shall be processed and stored in accordance with our data protection privacy policy.

### **(14) REPORTING AND RESPONDING TO HARM OR RISK OF HARM**

(a) We aim to ensure that children and young people are safe from harm and risk of harm in all jurisdictions where we operate.

(b) We have obligations in all jurisdictions where we operate as well as some obligations which apply specifically under the laws of South Australia, as follows:

(I) Section 17 of the *Children and Young People (Safety) Act 2017 (SA)* 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.

(II) Mandated notifiers in our organisation are Workers who:

- support 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.

(III) In South Australia, mandated notifiers have a legal obligation to notify the Child Abuse Report Line (CARL) on 13 14 78 as soon as practicable if they have a reasonable belief that a child or young person is 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.

(IV) In cases involving Aboriginal children and young people, support is provided by Yaitya Tirramangkotti - an Aboriginal team,

via the CARL number.

(V) Even if not a mandated notifier, any person can report harm or risk of harm to a child or young person. The individual 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.

(VI) Information about making appropriate reports of harm or risk of harm is available from the South Australian Department of Child Protection website: <https://www.childprotection.sa.gov.au/reporting-child-abuse>.

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

(VIII) Following a report being made to CARL or SAPOL Workers must make an internal report to management.

(IX) We will be guided by South Australia's Department for Child Protection and/or SAPOL after a report has been made as to whether we can conduct an internal investigation.

(X) 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.

(c) Following a report to the police or any other authorities (including but not limited to CARL or SAPOL in South Australia), 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.

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

## **(15) REPORTING AND RESPONDING TO GENERAL COMPLAINTS OR FEEDBACK**

(a) 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 when they join our organisation.

(b) Compliments, complaints or feedback can be provided verbally or in writing

to any Worker or direct to management either by telephone, email or by post, using the following details:

Phone: 1800 877 222  
Email: [info@ourpacc.com.au](mailto:info@ourpacc.com.au)  
Address: 84 Reservoir Road Modbury 5092 SA

(c) We will deal with all complaints and feedback received from children, young people or their families promptly, sensitively and fairly. We will:

- listen to the complaint/feedback
- the person receiving the complaint will make a record of it if received verbally
- advise of 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 within the following timeframe: 7 days
- clearly document and securely store decisions and actions taken in response to complaints and feedback
- make sure that procedural fairness is followed at all times.

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

- Australian Human Rights Commission Online:  
[www.humanrights.gov.au](http://www.humanrights.gov.au) Tel: 1300 656 419
- South Australian Equal Opportunities Commission (for complaints relating to discrimination in South Australia) Online: [www.eoc.sa.gov.au](http://www.eoc.sa.gov.au)  
Tel: 08 8207 197

## **(16) RISK MANAGEMENT**

We take risk management very seriously at our organisation. This section identifies various risks relating to children and young people that may be encountered at our organisation, and the actions we take to minimise and manage each of those risks:

<b>Identified risk</b>	<b>Actions to minimise risk</b>
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<p>Organisational workers don't understand their obligations to report harm and risk of harm to the Child Abuse Report Line (or SA Police if child/young person is at immediate risk)</p>	<ul style="list-style-type: none"> <li>• all workers trained in Safe Environments – Through their Eyes on commencement and refresher training every 3 years after</li> <li>• all workers trained in Responding to Risk of Harm and Neglect – Education and Care on commencement and refresher training every 3 years after</li> <li>• all workers must abide by the child safe environments policy and Code of Conduct (latter is signed on commencement with organisation)</li> </ul>
<p>Physical contact</p>	<ul style="list-style-type: none"> <li>• any physical contact must be appropriate to the delivery of services being provided</li> <li>• 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</li> <li>• unnecessary physical contact is not allowed</li> </ul>
<p>Transport of children and young people</p>	<ul style="list-style-type: none"> <li>• workers must not transport a child or young person unless specifically approved</li> <li>• parents/guardians must provide consent before transporting a child or young person</li> <li>• the worker must have a valid, unrestricted driver's licence</li> <li>• the vehicle must be registered, insured and in roadworthy condition</li> <li>• a worker must not be alone in a vehicle with a child or young person</li> </ul>
<p>Supervision</p>	<ul style="list-style-type: none"> <li>• if child/young person not collected by parent/guardian at end of class/training, two adults are to stay with child/young person until they are collected</li> <li>• when providing one to one consultation with a child or young person, it will be in line of sight of another adult</li> </ul>
<p>Taking images of children and young people</p>	<ul style="list-style-type: none"> <li>• consent of child young person and their parent/guardian required</li> <li>• 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/guardian</li> </ul>
<p>Physical environment</p>	<ul style="list-style-type: none"> <li>• maintain a risk register that is reviewed annually to ensure effectiveness</li> <li>• conduct risk assessments for all activities</li> <li>• ensure all equipment is in good working order</li> </ul>

<p>Privacy and confidentiality</p>	<ul style="list-style-type: none"> <li>• all documents containing confidential information will be stored privately in a locked filing cabinet (or similar place with restricted access)</li> <li>• digital files containing confidential information shall be protected electronically by restricting the access to only those requiring it to perform their duties</li> <li>• workers must not disclose information regarding any child or young person without written consent of the child, young person and their parent/guardian</li> </ul>
<p>Overnight and/or offsite activities</p>	<ul style="list-style-type: none"> <li>• consent of parent or guardian must be given</li> <li>• children and young people must be supervised by a minimum of 2 adults of the same gender as the children attending</li> <li>• privacy when children or young people are bathing, toileting and dressing must be provided</li> <li>• children and young people will not be left under the supervision of unauthorised persons</li> <li>• 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</li> <li>• 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</li> <li>• children and young people have the right to contact their parents, or another adult, if they feel unsafe, uncomfortable, or distressed during the stay</li> </ul>

## **(17) MANAGING RISKS POSED BY OTHER CHILDREN**

(a) It is important for all adults engaged by us to recognise that children can face harm from their peers. This can commonly take the form of bullying. Bullying can be defined as any behaviour which is:

- repeated; and
- has the intention of hurting somebody either physically or emotionally.

(b) Bullying can sometimes be motivated by prejudices based on certain groups, for example gender, race, religion or sexual orientation. Bullying can often include:

- physical harm perpetrated against another child
- name calling and threats
- cyberbullying (threats and abusive comments made via technology)

(c) Any instance of bullying or concern relating to possible bullying between

children at any event or activities arranged by us will usually be dealt with by us in the first instance as follows:

All children and relevant staff shall be spoken to individually to ascertain the facts. Where appropriate children will receive a first warning and relevant support / education.

(d) Where any behaviour amounting to bullying continues following this, the following steps will be taken:

The child or children who have found to be responsible for persistent behaviour which amounts to bullying another child shall be banned from attending the premises.

(e) All steps in relation to the prevention or management of bullying should be taken in consultation with a Responsible Person.

## **(18) STAFF KNOWLEDGE, SKILLS AND AWARENESS**

We have strategies in place to supervise, train and support Workers to understand this 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:

- for all Workers in South Australia, ensure they read and understand *Mandatory Notification Information Booklet* during induction, which is available at: [https://dhs.sa.gov.au/\\_data/assets/pdf\\_file/0003/103179/CSE-Mandatory-notification-information-booklet.PDF](https://dhs.sa.gov.au/_data/assets/pdf_file/0003/103179/CSE-Mandatory-notification-information-booklet.PDF)
- for Workers in South Australia, ensure they complete *Safe Environments: Through their eyes* training every 3 years and/or *Responding to Risk of Harm, Abuse and Neglect Training*
- 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.

## **(19) SAFE PHYSICAL AND ONLINE ENVIRONMENTS**

We believe in promoting child safety and wellbeing in physical and online environments in order to reduce the risk of harm. We use a variety of measures to ensure that our physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.

## **(20) SAFEGUARDING CHILDREN AT THE ORGANISATION**

### **Responsibilities and Planning**

(a) Although the Responsible Persons will hold ultimate responsibility for overseeing the safety of children present at the Organisation, all individuals under this policy must also play an active role in ensuring the safety of children at all times.

(b) Where a certain type of events, activity or trip is taking place, we may issue an additional code of conduct, policy, or some specific other requirements which is specific to that occasion. Any such additional documentation will be made available to all those concerned (workers, parents, guardians etc.) in advance. They should be read carefully and adhered to.

(c) Appropriate background checking shall be undertaken wherever we are legally required to do so in respect of adults who are engaged by us (see the relevant section above).

### **Venues**

(a) The location for any events, activities and trips which are held by us shall always be risk assessed properly in reference to the suitability and safety for children. Fire and safety procedures and precautions shall be made clear to all those involved.

### **First Aid**

(a) If an ambulance is required, call 000. Please notify a manager or supervisor if an ambulance has been called.

(b) Any accident or injury concerning a child should be brought to the attention of the nearest first aider and should thereafter be formally reported to an available Responsible Person.

### **Consent Forms**

(a) We shall always obtain written consent from a parent or guardian in the following circumstances:

1. Wherever a trip to take place offsite.

2. Before a child plays any contact sport with us

(b) Consent will be obtained via:

On occasion in written format which shall be made available at the respective office.

(c) Consent forms will include emergency contact details and will set out any specific safety needs/requirements for children.

(d) All consent forms will be kept secure and shall be stored in accordance with our data protection privacy policy.

### Supervision

(a) For most activities and events, our procedure for supervision of children is as follows:

For groups of children aged between 9 and 12, there shall be 1 adult present for every 8 children. For groups of children 13+ there will be one adult to every 10 children.

(b) Wherever a child attend our premises alongside their parent or guardian, parents and guardians should ensure that children are properly supervised.

## **(21) MANAGING BEHAVIOUR OF CHILDREN GENERALLY**

(a) Whenever any adult engaged by us is faced with challenging or inappropriate behaviour from a child or with conflict between children, they must:

- treat each child fairly and equally
- approach the situation in a calm and neutral manner
- only ever use physical restraint/intervention in order to protect the immediate safety of a person, for example to prevent an injury or harm either to the child or others
- wherever it is justified to physically restrain a child or to physically intervene, the amount of force used should be kept to the absolute minimum taking into account the risk posed.
- make a written record of the incident and ensure this is reported appropriately to an available Responsible Person

(b) Further details regarding our procedures for managing behaviour can be located in our behaviour policy:

On our website ([www.ourpacc.com.au/behaviour-policy](http://www.ourpacc.com.au/behaviour-policy))



## **(22) PHOTOGRAPHY**

### Our Photographs

(a) On some occasions, we may take photographs featuring children. We recognise that photography of children carries risks, such as:

- the potential for images to be re-used, shared or adapted in a damaging or inappropriate manner
- the general risk of sharing images and the impact this could have on child's public image as they grow older

(b) In view of these risks, we will:

- always ask for written permission from a child and their parent/guardian before taking and sharing any image of them
- always ensure that a child and their parent/guardian are properly informed how an image will be used and shared
- always ensure that a child's identity is protected as far as is possible within any published material
- ask that parents, guardians, children and any other person connected to them who may wish to share any of our published images which features other children to refrain from doing so unless they have the permission of the other children and their parent/guardian
- always store photos in accordance with our data protection policy.

### Members of the Public

We ask that any members of the public attending our premises, events or activities do not take photographs.

(a) Further information is contained in our photography policy which can be found:

From a member of reception at all our sites.

## **(23) REVIEWING OUR CHILD SAFE POLICIES AND PROCEDURES**

(a) We regularly review our child safe policies and procedures so that we can continue to improve them.

(b) At a minimum, we will review our policies and procedures (including this Policy) once every five years, as required by the *Children and Young People (Safety) Act 2017 (South Australia)*.

(c) We will also review this Policy in the following circumstances:

If there are any material changes in our procedures relating to children or

young people. If there are any legitimate complaint raised by any children or young people or their families.

(d) We will lodge a new child safe environments compliance statement with any relevant authorities (including but not limited to South Australia's Department of Human Services) each time we review and update this Policy.

## **(24) HOW WE MAKE OUR POLICIES AND PROCEDURES AVAILABLE**

(a) We strive to ensure that our child safe policies and procedures (including this Policy) are understood by all Workers and relevant stakeholders.

(b) We strive to ensure that children who engage with our Organisation, as well as their families and relevant community members, are aware of, understand and have confidence in our child safety policies and procedures (including this Policy).

(c) We make our child safe policies and procedures (including this Policy) available to children, young people and their families in the following manner:

This policy is available on our website and is provided to the families of all children who register with us.

## **(25) FEEDBACK FROM CHILDREN AND YOUNG PEOPLE**

We encourage children and young people to participate and provide feedback in the following manner:

- Including families in how we operate and encouraging children to provide feedback.
- The use of surveys to invite formal and informal feedback from children and young people.
- Educating children and young people on what harm is and develop their understanding of protective practices.

## **(26) HOW WE INFORM CHILDREN AND YOUNG PEOPLE ABOUT THEIR RIGHTS**

(a) We use the following processes to inform children and young people about their rights including their right to safety and the right to be listened to:

We provide clear age-appropriate or developmentally appropriate explanations to children and young people including their right to safety, their right to be listened to and that they can provide a feedback or make a complaint if they have any concern to any worker or ask their parent / guardian to this on their behalf. We will listen to and act upon any complaints or concerns that the child / young person raises with us.

(b) We educate children and young people on what harm is and develop their understanding of protective practices.

## **(27) ENGAGING WITH FAMILIES AND COMMUNITIES**

(a) We encourage our Workers, when engaging with children, to involve the families of those children whenever it is appropriate, and provided that doing so will not compromise the safety of the child.

(b) When doing this, our Workers should keep in mind that in some cases, children can be placed at risk by family members or by members of the community, so involving the child's family could expose the child to additional risk.

(c) We use the following measures to ensure that we have effective communication and participation strategies for engaging with and responding to the diverse needs of families and communities:

A copy of this policy is provided to all parents / guardians of children registered with us.

## **(28) RESPECTING EQUITY AND DIVERSITY**

We strive to create an environment where children and young people's diverse needs and circumstances are recognised and all children feel safe, welcome and included. We do this by using the following measures:

We make sure to employ people from diverse backgrounds at all levels of organisation.

## **(29) ADMINISTRATION OF THIS POLICY**

(a) This Policy was approved by: Salman Khan

(b) This Policy was approved on: 8th January 2024

(c) This Policy is due to be reviewed on: 1st January 2025

(d) The following person is responsible for leading the review process for this Policy: Salman Khan

## **(30) FURTHER INFORMATION**

We thank you for the time you have taken to review and consider this Policy. If you have further questions or want to discuss any matters in connection with this Policy, please direct all such communication to:

Natalie Joppich  
Business Manger  
Natalie@ourpacc.com.au

**(31) ACKNOWLEDGEMENT**

By signing below, you acknowledge having read and understood this Policy, and you agree to comply with this Policy:

.....  
*Signature*

.....  
*Name*

.....  
*Date*