

Mansfield Autism Statewide Services

Child Safe Policy and Procedures

HS14	Healthy and Safe	Child Safe Policy and Procedures
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What this policy aims to do	<p>Ensure that children accessing MASS services are safe from child abuse. MASS has zero tolerance for child abuse and is committed to the safety of all children from all forms of child abuse.</p> <p>This policy is an overarching document that provides key elements of MASS’s approach to protecting children from abuse and is linked to procedures, practices, decision-making processes, risk management and reporting processes. MASS’s Child Safe Policy and Procedures set out the requirements, obligations and actions of MASS people to comply with the legal and moral requirement for child safety.</p>
Who this policy applies to	Board members, managers, employees, contractors and volunteers and MASS clients.
Who is responsible for carrying out this policy	Board members, managers, employees, contractors and volunteers.
What words used in this policy mean	<p><i>Child abuse</i> includes:</p> <ul style="list-style-type: none"> • Sexual offences • Grooming • Physical violence • Serious emotional or psychological harm • Serious neglect, and • A child’s exposure to family violence. <p>Other definitions relevant to the Child Safe Policy and Procedures are included in Section 1 Procedures.</p>
Legislation this policy is based on	<p>The Children, Youth and Families Act 2005 Child Wellbeing and Safety Act 2005 Education and Training Reform Act 2006 Workers Screening Act 2020 Crimes Act 1958 (Vic) Family Violence Protection Act 2008 Victorian Child Safe Standards NDIS Practice Standards Nov 2021</p>

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	Victorian Family Violence Multi-Agency Risk Assessment and Management Framework (MARAM Framework)
Other relevant policies	MG4 Risk Management MS3 Code of Conduct MS1 Recruitment HS12 Client Incident Reporting A1 Client Rights and Responsibilities HS5 Freedom from Abuse and Neglect HS7 Information Privacy

Version	Date	Author/Editor	Approved by	Notes
1.0	5/11/18	D Stephenson	S. Reeves	Review and update
1.1	17/6/2020	D Stephenson		Annual Review, added reference to NDIS Practice Standards.
1.2	9/7/2020	D Stephenson	S Reeves	Updated 4 Critical Actions Diagram
1.3	11/11/2021	P Wilks, T de Vries	S. Reeves	Added new Child Safe standards, updated four critical actions diagram
1.4	27/09/2022	T de Vries	S Reeves	Update after VRQA advice
1.5	11/07/2023	P Wilks	S Reeves	Re-brand, annual review

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Commitment to Child Safety

MASS has zero tolerance for child abuse and is committed to acting in children's best interests and keeping them safe from harm. MASS regards its child safety responsibilities with the utmost importance and as such, is committed to providing the necessary resources to ensure compliance with all relevant child safety laws and regulations to maintain a child safe culture and environment.

MASS complies with the eleven compulsory Victorian Child Safe Standards (VCSS) in all parts of the organisation. Our commitment to child safety is set out in this Child Safe Policy, Procedures and our Code of Conduct.



This Child Safe Policy provides the framework for MASS to:

- Develop and review work systems, practices and procedures that promote child safety
- Create a positive and robust child safety culture
- Promote the open discussion of child safety issues, and
- Comply with all laws, regulations and standards relevant to child safety in Victoria.

Child abuse includes sexual offences, grooming, physical violence, serious emotional or psychological harm, serious neglect, and child's exposure to family violence.

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Participation and Empowerment of Children

MASS's clients are autistic children who may have intellectual, physical and emotional disabilities. MASS has developed its Child Safe Policy and Procedures with this as a significant consideration as autism is manifested in different ways and can limit the contribution of clients to the development of this policy and procedures. MASS has consulted with staff, clients and families to develop the Child Safe Policy. [Victorian Child Safe Standard 4 (VCSS 4)].

MASS values diversity and does not tolerate discrimination. To achieve this we:

- support the cultural safety, participation and empowerment of Aboriginal children and their families;
- support the cultural safety, participation and empowerment of children and young people from culturally and/or linguistically diverse backgrounds and their families;
- support the cultural safety, participation and empowerment of lesbian, gay, bisexual, transgender and intersex (LGBTI) children and young people and their families;
- commit to ensuring our facilities promote inclusion of children of all abilities and are appropriate for children and young people with autism.

Organisational Culture of Child Safety

MASS is committed to an organisational culture of child safety through the implementation of the Child Safe Policy and Procedures (VCSS 1, 2, 10, 11). Effective leadership by the Board, the CEO and all staff will strengthen and maintain a zero tolerance for child abuse. Several actions and services support ongoing culture of child safety and include:

- Child Safe program of education and support for all MASS staff
- Child Safe Code of Conduct
- Child Safety Officers
- Clear guidelines for reporting child abuse concerns
- Creating an environment supportive of children and young people from Aboriginal and Torres Strait Islander, culturally diverse backgrounds and LGBTI children.

Child Safe Code of Conduct

MASS has developed a plain language Child Safe Code of Conduct ([MS3 Staff Code of Conduct](#)) which specifies appropriate standards of behaviour for adults towards clients in all MASS environments, including out of normal hours activities (VCSS 5, 6, 8, 11).

The Child Safe Code of Conduct is included in the MASS Codes of Conduct Policy (MS 3). All staff are required to read and understand their obligations and acknowledge this by signing the Code. The signed Code of Conduct will be kept on file by Human Resources.

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Additional information related to the Child Safe Code of Conduct and the expected behaviours of staff are provided in additional policies listed in the title page.

Recruiting Staff and Volunteers

MASS undertakes a rigorous process of screening, supervision, training and other human resource practices that reduce the risk of child abuse by new and existing personnel (VCSS 6, 8).

Recruitment and selection strategies include:

- Assessing the level of contact and responsibility the role will have in relation to children and young people
- Ensure the required checks and any other background screening occurs prior to the new employee commencing in the position. Screening should include: Working With Children, National Police Check, NDIS Worker Screening Check, Victorian Register of Sexual Offenders
- Ensuring the required qualifications and prerequisites are in place to ensure that staff are appropriately skilled for the role
- Assessing the training, guidance and supervision required for the position and the current resources available to meet these requirements
- Advertising for positions will state the responsibilities related to children and young people, and prerequisite checks for the position, for example Working With Children, National Police Check, NDIS Worker Screening Check, Victorian Register of Sexual Offenders
- Interview questions ask about experience and previous engagement with children to gauge the applicant's attitudes and values related to children
- On commencement, staff will be required to sign a Child Safe Code of Conduct and undergo an induction session on the MASS Child Safe Policy and Procedures. The induction training includes responsibilities for providing a Child Safe environment, obligations for responding and reporting actual or suspected child abuse and the consequences for non-compliance.

Support and Training for Staff and Volunteers

MASS is committed to ensuring that all leaders, staff and volunteers receive training and support to ensure they understand their responsibilities in relation to child safety (VCSS 8). MASS assists its leaders, staff and volunteers to incorporate child safety consideration into decision making and to promote a culturally safe environment where children are empowered to speak up about issues that affect them.

Mandatory Child Safe training requirements for MASS leaders, staff and volunteers include:

- At induction, Child Safe Code of Conduct and Child Safe Policy
- Completion of e-learning module on child safety and complete an assessment
- Annual Child Safe refresher training for the Board, and staff that do not have direct contact with children

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- Quarterly refreshers for all contact staff on the four critical actions for responding to incidents, disclosures and suspicions of child abuse.

Board of Directors

Each member of the Board of Directors is required to ensure that appropriate resources are made available to allow MASS's Child Safe Policy and Procedures to be effectively implemented within MASS and are responsible for holding the CEO and Senior Managers accountable for effective implementation.

The Board also undertakes annual Child Safe training ([VCSS 2, 8](#)).

CEO

The CEO is responsible, and will be accountable for, taking all practical measures to ensure that this Child Safe Policy and Procedures is implemented effectively and that a strong and sustainable child safety culture is maintained within MASS.

Child Safety Officers

A number of senior staff members are nominated as Child Safety Officers. MASS's Child Safety Officers are the first point of contact for raising child protection concerns within MASS. They are also responsible for championing child protection within MASS and assisting in coordinating responses to child safety/protection issues.

Staff Members

All staff are required to be:

- familiar with the Child Safe Policy and Procedures and their legal obligations with respect to the reporting of child abuse, and
- aware of key risk indicators of child abuse, to be observant, and to raise any concerns they may have relating to child abuse with one of the Child Safety Officers. See [HS5 Freedom from Abuse and Neglect for](#) more details and common red flags.

Direct Contact Volunteers

All Direct Contact Volunteers, as defined for this policy, are required to be:

- familiar with the Child Safe Policy and Procedures and their legal obligations with respect to the reporting of child abuse
- aware of key risk indicators of child abuse, to be observant, and to raise any concerns they may have relating to child abuse with one of the Child Safety Officers. See [HS5 Freedom from Abuse and Neglect for](#) more details and common red flags.

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Indirect Contact Volunteers

Indirect Contact Volunteers are those volunteers who are involved in providing support and services whilst not directly assisting a specific group of clients. Examples of Indirect Contact Volunteers could include activities such as assisting with a MASS function, catering or fundraising activities.

All Indirect Contact Volunteers are:

- contributing to the safety and protection of children in the MASS environment
- required to be familiar with the Four Critical Actions for responding to incidents, disclosures and suspicions of child abuse.

Third Party Contractors

All Third Party Contractors (contractors) engaged by MASS are responsible for contributing to the safety and protection of children in the MASS environment. All service providers engaged by MASS are required to be aware of MASS's Child Safe Policy and Procedures and the Four Critical Actions for responding to incidents, disclosures and suspicions of child abuse. MASS may include this requirement in the written agreement between MASS and the Contractor.

Third Party Contractors include maintenance and building personnel, consultants, casual teachers or aides, tutors, sports coaches and cleaners. This also includes music teachers and other extra-curricular teachers and instructors who are engaged by clients and their families directly, rather than by MASS directly, but have an agreement to use MASS facilities.

Responding to and reporting allegations of child abuse

MASS has established simple and accessible procedures for anyone to report a child abuse concern internally to one of the MASS Child Safety Officers. The names and contact details for the Child Safety Officers is provided to all staff, displayed at all MASS premises, and available in the Child Safe Procedures online and hard copy. MASS has a Senior Child Safety Officer and two Child Safety Officers. See *Four Critical Actions for Responding to Incidents, Disclosures and Suspicions of Child Abuse*.

See also [HS5 Freedom from Abuse and Neglect](#) for more details and common red flags.

Child Safety Officers have specific responsibilities for responding to any complaints made by staff, volunteers, parents or children. If a person is not comfortable making a report to a Child Safety Officer, they may report their concern to the CEO or Chair of the MASS Board of Directors. An individual may also make a report to Child Protection (DFFH), ChildFIRST or Victoria Police with concerns.

The Child Safe Procedures detail how to respond to an allegation or incident of child abuse and provide examples of the information to be noted and mechanisms for submitting a report. A summary titled *Four Critical Actions for Responding to Incidents, Disclosures and Suspicions of Child Abuse* is the first page of the Procedures and provides a simple explanation of what to do if staff are concerned about a child's safety.

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If a staff member, volunteer or contractor becomes aware of an incident of allegation of abuse, the first responsibility is to ensure that the child or children are safe and the risk of further abuse or harm are mitigated.

If the incident or allegation of abuse could involve criminal conduct, the matter must be immediately reported to Victoria Police. If there is any ongoing risk to a child or children, then the staff member or volunteer should immediately call 000.

It may also be appropriate to notify the Department of Families Fairness and Housing (DFFH) if there is belief that a child is in need of immediate protection. This may involve notifications to the police or Child Protection.

All reports of child abuse received by MASS will be treated as serious, whether they are made by an adult or a child.

When an allegation of child abuse is received, all mandatory reporting requirements must be met, including reporting to:

- Victoria Police
- NDIS Quality and Safeguards Commission
- Department of Families Fairness and Housing
- The Commission for Children and Young People if the allegation involves a MASS member of staff or volunteer under the reportable conduct scheme
- Other government department such as the Victorian Institute of Teachers or regulators as appropriate.

Record Keeping and Incident Monitoring

MASS has an [Information Privacy Policy \(HS7\)](#) and is committed to best practice record keeping. In accordance with the Information Privacy Policy and as required in the [Client Incident Reporting Policy \(HS12\)](#), all reports of child abuse shall be recorded within the incident reporting system.

MASS will ensure that records and reports of child abuse are kept confidential and private for children and families in accordance with legislation. MASS staff and volunteers will be required to abide by the Code of Conduct Policy and maintain confidentiality and privacy of records and reports.

Reports of child abuse and complaints about child safety will be monitored by the Senior Child Safety Officer to ensure they are appropriately managed. Risks to child safety that are identified in complaints and reports of abuse will be reviewed and incorporated into the Child Safe risk management plan.

Risk Management

MASS recognises the importance of a risk management approach to minimising the potential for child abuse or harm to occur and use this to inform our policies, procedures and activity planning.

MASS Child Safe Risk Management Plan includes the following elements:

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- All existing and new activities and facilities will be assessed for risks of child abuse including:
 - Environmental risks (eg areas that might obscure a line of sight)
 - Vulnerability risks (such as activities that may foster personal relationships between staff/volunteers and children)
- All identified risks of child abuse are actively reduced by designing and implementing appropriate preventative measures. All staff are aware of, and look out for, red flags.
- Risk management plans are documented for all existing and new activities and facilities.
- Staff, volunteers and contractors are made aware of their responsibility for identifying risks of child abuse and their obligation to work with management on reducing those risks.
- Families and children are made aware of how to report on identified risks of child abuse. See *Four Critical Actions*.
- Risk management plans are living document that are updated as required, referred to regularly and reviewed periodically.

Reviewing this Policy

MASS is committed to continuous improvement in all its operation including this Child Safe Policy and Procedures (VCSS 10). It is the responsibility of the Senior Child Safety Officers to regularly review the Child Safe Policy and Procedures to ensure that it is working in practice and that the school is meeting its legal and regulatory obligations relating to child safety. Feedback from children, parents, carers, staff and volunteers will be sought on an annual basis (VCSS 4).

Implementation

The MASS Child Safe Policy and Procedures are implemented through a combination of:

- Staff training and development in professional conduct and creating a child safe, culturally appropriate environment
- Staff training and development in warning signs and red flags, and how to handle these.
- Client and parent/carer education and information
- Effective management of staff engaging in inappropriate relationships with clients
- Effective management of conflict of interest
- Effective communication and incident notification procedures
- Effective record keeping procedures
- Initiation of corrective actions where necessary.

Non-compliance with this Policy and the Code of Conduct

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Where a staff member breaches any obligation, duty or responsibility within the MASS Child Safe Policy and Procedures, MASS may take disciplinary action, including in the case of serious breaches, summary dismissal.

Where any other member of the MASS community breaches any obligation, duty or responsibility within the MASS Child Safe Policy and Procedures, MASS may take appropriate action.