Example: Child Safe Reporting Procedure

This template should be amended and expanded upon as applicable to your organisation’s individual circumstances, taking into account mitigating factors (including but not limited to):

* size of organisation
* level of engagement with children (e.g. regularly employ child performers, regularly run education programs, occasionally hire out venue for school performances, occasionally have child audience members that may be unsupervised)
* type of engagement with children (e.g. performers, employees, work experience, education program participants, audience members)
* exposure to risks of harm in the organisation (e.g. transport of children)
* state legislative requirements (e.g. child employment, WH&S).

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| [Organisation name]Child Safe Reporting Procedure  |

## Purpose

[*Organisation name*] is a Child Safe Organisation that proactively aims to create a safe and nurturing environment for all its students/child employees/workshop participants [guidance note: amend accordingly]. As part of this, *[Organisation name]* expects that all employees including staff, volunteers, contractors, and any other members of the community engaged in the organisation can raise child safeguarding concerns.

This document will assist all parties to:

1. identify the different types of harm or neglect that children and young people may be exposed to
2. understand their specific roles in reporting child safeguarding concerns
3. report child safeguarding concerns in a timely fashion to all necessary internal and external parties.

## Scope

This Procedure applies to any person (child or adult) involved with the organisation including:

[Guidance note: Amend this list to be applicable for your organisation]

* any adult (18 years or older) engaged by *[Organisation name]* that may work with children at any time such as:
* employees (permanent and casual):
* leadership and management roles
* administration
* education instructors and youth workshop facilitators
* production and venue personnel (actors, stage management, chaperones, technical crew, ushers, etc.)
* volunteers
* contractors and sub-contractors
* tutors
* board members
* work experience students/interns/secondments
* any other individual in the organisation that may deal with children
(Note: In this Procedure, the term “employee” is used to cover all persons occupying any position listed above.)
* children (under the age of 18 years unless otherwise specified)
* parents (including carers or legal guardians).

## Related documents

This procedure should be read in conjunction with [*Organisation name*]’s other relevant policies, procedures, and documents, including: [guidance note: list relevant policies and procedures]

* Child Safe Policy and Commitment to Child Safety
* Child Safe Code of Conduct
* Policy on Exposure to Adult Themes
* Policy on Auditions and Casting
* Policy on Using Images of Children.

## Reporting & Complaints

### Reporting principles

The duty to report a child safety concern to child protection authorities and/or the police applies to a reasonable belief that child abuse is either likely to occur in the future, and/or child abuse may have already happened. Belief on ‘reasonable grounds’ is formed if a reasonable person in the same position would have formed the belief on the same grounds.

As long as reports are made in good faith:

* it does not constitute unprofessional conduct or a breach of professional ethics on the part of the reporter
* the reporter cannot be held legally liable in respect of the report.

*[Organisation name]* approaches its reporting responsibilities through a child-focused lens, prioritising the rights of children. The following principles govern this approach:

* A child making a disclosure is always to be believed.
* The best interests of children are paramount.
* *[Organisation name]* complaints handling and reporting systems are accessible and recognise the diverse needs of children and young people, and their families.
* Complaints are dealt with thoroughly and promptly.

### Who can make a complaint?

Any person including employees, parents/carers and children should promptly raise their concerns or lodge a complaint about:

* inadequate working conditions for children (as per relevant state child employment legislation or LPA Code of Practice for Child Employment in Live Entertainment)
* conduct not in keeping with the organisation’s child safe policies and procedures
* concern of suspected or potential child abuse or neglect.

If employees suspect or witness an incident of unacceptable behaviour towards a child, they are obliged to report the incident to the Child Safety Officer or management as a matter of urgency. In addition to reporting the incident, the employee should ensure that the child is safe from any immediate risks.

Any person that believes a child is at immediate risk of abuse should call 000.

[*Organisation name*] will provide children and parents/carers with clear information about who to contact (and how) if they have any concerns or complaints.

### What type of concerns should be raised?

Any of the following should be reported to the appropriate contact promptly:

* alleged, suspected or observed incidents of abuse or neglect (as a matter of urgency)
* conduct not in keeping with [*Organisation name*]’s child safe policies and procedures
* perceived risks in the organisation’s environment (e.g. inadequate working conditions)
* wellbeing concerns, including concerns around children and young people’s mental health, sign of self-harm etc.

Abuse and neglect include:

* *physical abuse:* purposefully injuring or threatening to injure a child
* *emotional abuse:* an attack on a child’s self-esteem e.g. through bullying, threatening, ridiculing, intimidating or isolating the child
* *sexual abuse:* any sexual act or sexual threat imposed upon a child
* *neglect*: harming a child by failing to provide basic physical or emotional necessities
* *exposure to family violence:* behaviour by a person towards a family member that may include physical violence or threats, verbal abuse, emotional or psychological abuse, sexual abuse, financial and social abuse
* *grooming:* preparing a child for the act of a sexual activity.

Employees will be provided with information about how to recognise signs of potential abuse.

### Who should complaints be made to?

Complaints or concerns should be lodged with *[name/position of member of staff appointed Child Safety Officer]* or other relevant management position using any method (verbally, email, call, etc.) that the employee, parent/carer or child feels comfortable with. Urgent matters should not be conveyed by email.

If an act of criminal activity has been alleged, such as physical or sexual abuse, child protection authorities/police will be informed urgently and the child will be kept safe from any immediate risks.

### How will all complaints be handled by the organisation?

*[Organisation name]* is committed to being responsive to concerns raised by employees, children and parents/carer, and seeks to resolve issues with the welfare of children as our first priority.

The appointed Child Safety Officer or relevant management will investigate the nature of the complaint raised in a timely fashion, allowing the person against whom the complaint has been made the opportunity to respond. If a complaint has been made about the actions of another child, their parents/carers will be informed.

If appropriate and in the best interests of the child, the Child Safety Officer or relevant management will seek to resolve the complaint and rectify any issues raised to the satisfaction of all parties in the first instance.

Any complaints or concerns about perceived risks in the organisation’s environment (e.g. inadequate working conditions, exposure to adult themes) will be addressed by *[Organisation name]* and rectified promptly.

If *[Organisation name]* becomes aware of, or has been alerted to, a risk of child abuse by someone involved with the organisation, we will act to reduce or remove the risk and protect the child as our first priority. We will promptly contact child protection authorities/the police when a child or adult alleges any criminal activity has occurred, such as physical or sexual abuse of a child.

The child (and if appropriate, parents/carers) will be informed of the steps *[Organisation name]* is taking to address the complaint.

*[Organisation name]* may also provide support for the child by referring and assisting children and/or parents/carers to access other appropriate services.

### How will the complaint be resolved?

The *[name relevant leadership position (e.g. producer, director, venue manager, etc.]* shall determine if:

* a person should be disciplined in accordance with the misconduct committed and within the organisation’s means; or
* the matter should be referred to an appropriate authority for further investigation and action pursuant to the law.

For procedural fairness, any person involved in a complaint about unacceptable conduct towards a child is encouraged to seek support from the [guidance note: amend accordingly] [*Organisation name*]’s Employee Assistance Program or any other relevant person.

All complaints about unacceptable conduct shall be documented, including:

* record of action taken
* any internal investigation conducted
* any reports made to statutory or external bodies.

In accordance with security and privacy requirements, these records will remain confidential unless otherwise requested to be released by law.

With due consideration of confidentiality and fairness regarding any person against whom a complaint is made, the risk of harm to children is our primary concern.

## Responding to disclosures

Child safeguarding concerns may arise in a range of ways – for example, through direct disclosure, observation or information received from others. Employees should remain open and aware to the various ways concerns may arise. The types of complaints or concerning behaviours that require reporting may include:

* suspicions or beliefs that children have suffered or are at risk of suffering abuse, harm or neglect
* inappropriate relationships developing between children and adults, or between children of a significant age difference
* observations of concerning changes in behaviour
* feelings of discomfort about a relationship between a child and employee, contractor or volunteer
* disclosures of child abuse must be reported to child protection authorities.

Any other suspected or actual breach of this Child Safe Reporting Procedure, Child Safe Policy, Child Safe Code of Conduct, or other policy, procedure or practice related to the safety of children must be reported to the Child Safety Officer, management and/or CEO/Head [guidance note: amend accordingly].

*[Organisation name]* expects all employees to be alert to any potential child abuse, child harm, risk of harm and neglect in all contexts and report concerns in accordance with this document.

Staff who notice behavioural signs of abuse are encouraged to talk with the child when they are disclosing a concern. Disclosures should be enabled through an open approach which includes:

* management establishing honest two-way communication between themselves and others
* management being respectful in all interactions with employees, contractors, volunteers and children and their families
* staff being open and honest with children and families about confidentiality limits
* staff educating and supporting personnel to understand their role and to respond to disclosures in a confident and supportive manner.

This disclosure is to be distinguished from an investigative interview process, which must follow a formal process.

### How will complaints from children be handled by the first point of contact or Child Safety Officer?

*[Organisation name]* will inform children of who to talk to if they need to raise an issue.

*[Organisation name]* employees that receive a complaint from a child will:

* let the child talk about their concerns in their own time and words, and give the child the necessary attention, time, and space to raise their issues
* be a supportive and reassuring listener
* tell the child that raising their concerns was the right thing to do and let them know in plain language the process by which their concerns will be addressed and acted upon
* record the nature of the complaint in the child’s own words
* contact the child’s parents/carers, if appropriate.

### Safety of children who face additional forms of discrimination (at-risk)

[*Organisation name*] recognises the diverse circumstances of children and works in child-centred ways that celebrate the strengths and individual characteristics of children and embrace them regardless of their abilities, sex, gender identity, socioeconomic status and cultural background.

If an allegation of abuse involves an Aboriginal child, it is important to ensure a culturally appropriate response. A way to help ensure this could include engaging with parents of Aboriginal children, local Aboriginal communities or an Aboriginal elder.

Some children with a disability may experience barriers disclosing an incident. For example, children with hearing or cognitive impairments may need support to help them explain the incident, including through sign language interpreters.

Children who live in out-of-home care may also need additional support. Out-of-home care is defined as a temporary, medium or long-term living arrangement for children and young people who cannot live in their family home.

Out-of-home care includes foster care, kinship care, permanent care, residential care and lead tenant arrangements. Staff should report suspicions or allegations of abuse of children in statutory out-of-home care to child protection authorities as well as the head of the organisation.

### Responding to harmful sexual behaviour in children and young people

Research indicates that a significant proportion of sexual abuse that occurs in the context of organisations is perpetrated by children. Sexually harmful behaviour involves children engaging another party in sexual activity that is either unwanted or where, due to the nature of the situation, the other party is not capable of giving consent (e.g. children who are younger or who have a cognitive impairment).

[*Organisation name*] is committed to ensuring all employees have access to education and support which prepares them to prevent and identify sexually harmful behaviours and respond to peer-to-peer abuse in a timely, child-focused and protective manner.

If a child perpetrates abuse or harm, [*Organisation name*] has a duty of care to both the perpetrator and victim. [*Organisation name*] recognises that a child who demonstrates sexually harmful behaviours requires therapeutic intervention. They may also have suffered abuse and therefore may require protection.

[*Organisation name*] staff will consult the appropriate member of the [insert relevant role - e.g. Executive/Child Safe Officer] to agree on the process for notifying parents/carers about the concern. In doing so, they will be guided by advice from relevant authorities (i.e. child protection authorities and the police).

### Confidentiality

All employees should ensure that where concerns arise, confidentiality is maintained as far as possible. Internal and external reporting should take place as per this reporting procedure, with internal communication about concerns occurring on a ‘need to know’ basis only. Only personnel directly involved in the management of the child’s situation and responsible for meeting the reporting obligations are to be involved in discussions regarding the child’s identity, or details of the suspected abuse. Exceptional circumstances apply, including:

* There is a reasonable belief that a child has been harmed, suffered neglect, or is at risk of harm necessitating an obligation to report to authorities, such as child protection authorities and the police.
* The child has consented to a secondary disclosure and has the capacity to consent.

Parents/carers should be informed about the allegation of abuse and the internal processes.

Where parents/carers are the alleged perpetrators of abuse, [*Organisation name*] will seek advice from child protection authorities about how information is communicated and how to protect the child’s safety. In an alleged instance of child abuse, staff, volunteers and contractors are expected to seek advice from [insert relevant role – e.g. the Child Safety Officer/their line manager/ the CEO/Head or delegate]regarding the dissemination of personal information.

### Record keeping

Timely, clear, and effective record keeping is an important part of ensuring *[Organisation name]* is a Child Safe Organisation. Record keeping should include details of the child safety concern, key people involved, external agencies notified if relevant and any actions taken, including corrective.

### Responding to historical allegations of abuse

In all circumstances where historical abuse allegations are made which pertain to [*Organisation name*], the organisation will cooperate fully with child protection authorities and/or the police. [*Organisation name*] will also review its current policies and procedures in light of any findings of historical abuse investigations to determine if there are learnings that may strengthen protective approaches.

[*Organisation name*]’s procedure for responding to historical allegations of abuse includes:

* Any allegation of historical abuse which pertains to *[Organisation name]* should be notified to the CEO/Head or their delegate within 24 hours of receipt.
* The CEO/Head will be responsible for overseeing the handling of the allegation, including confirming whether it has been referred to the relevant authority (i.e. child protection authorities, the police [guidance note: include if the Reportable Conduct Scheme applies to your organisation] [and/or Reportable Conduct Scheme for Vic, NSW and ACT]) and that all relevant information held by *[Organisation name]* has been provided to relevant authorities.
* At the conclusion of the police investigation, the CEO/Head will determine whether it is appropriate to undertake an internal investigation, noting that an internal investigation would generally be warranted where the employee, contractor or volunteer implicated in the allegation is still involved with *[Organisation name]*.
* In all circumstances, *[Organisation name]* will undertake an internal review to determine if there is a need to amend any policies, procedures, or processes. Reviews will be focused upon the identification and application of learning to minimise future risk.

### Reporting principles

Once staff have formed a reasonable belief that a child is at risk or in need of protection, they will need to ‘report’.

* If a child is deemed to be at immediate risk of harm, the employee, contractor, or volunteer should contact emergency services on 000 immediately.
* All reports will be treated seriously, whether they are made by an adult, child, or young person.
* Where an employee or third-party provider forms a belief that a child has suffered child abuse or is at risk of harm, they must notify the *[insert relevant role – e.g. CEO/Head or Child Safety Officer]* within 24 hours.
* The employee, contractor, or volunteer is expected to contact the CEO/Head and their line manager in the first instance, unless doing so would pose a potential conflict of interest or place the child at further risk (e.g. if the line manager is the subject of the concern).
* The involved employee, contractor or volunteer will work with the CEO/Head or their delegate to agree on the appropriate reporting avenues (i.e. child protection authorities and/or the police). It is best practice for the recipient of the disclosure to make the report.
* Should the concern relate to risk posed by a *[Organisation’s name]* employee, volunteer or contractor, the CEO/Head will have overall responsibility for dealing with the matter [guidance note: include if the Reportable Conduct Scheme applies to your organisation] [and follow the appropriate procedure including that of the Reportable Conduct Scheme – Vic, NSW, ACT]
* *[Organisation’s name]* will treat all matters confidentially, disclose critical information to relevant authorities including child protection authorities and the police, and work in the best interests of the child.

### Reporting process

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| Step | Action | Who |
| **Emergencies:**  In case of emergency or if a child is in immediate danger contact Triple Zero (000) or the local police station. When the report has been made, move to the next step. All other concerns or reports start at the next step. | The employee, volunteer or contractor who identified a potential child safety concern.  |
| 1 | Keep comprehensive notes that are dated and include the following information: * information that has led to concerns about the child's safety (e.g. physical injuries, child’s behaviour, adult behaviour)
* the source of the report (e.g. observation of behaviour, disclosure from child or another person)
* actions taken as a result of the concerns (e.g. consultation with manager, child protection authority, police etc).
 | The employee, contractor or volunteer who identified a potential child safety concern. |
| 2 | Discuss any concerns about the safety and wellbeing of children with the Child Safety Officer, management and/or the CEO/Head. For internal reporting purposes, the employee or contractor together with the CEO/Head or delegate will make a determination regarding the need for reporting and to whom the report should be made, including the child’s parents.Note: The above does not substitute for the employee or contractor’s mandatory reporting obligations.  | The employee, volunteer or contractor who identified a potential child safety concern, and the CEO/Head. |
| 3 | Gather the relevant information necessary to make the report. This should include the following: * full name, date of birth, and residential address of the child or young person
* the details of the concerns and the reasons for those concerns
* if involving another party within the organisation, gather details regarding the individual employee, volunteer or contractor’s involvement with the child or young person
* details of any other agencies who may be involved with the child or young person, if known.
 | CEO/Head to be provided with information from the employee, volunteer or contractor who identified the potential child safety concern. |
| 4 | Make a report to the relevant agency: * Report concerns that are an **immediate risk by calling 000** or the local police station.
* Sexual offences need to be reported to the child protection authorities and police.
* Report concerns about the safety of a child to the child protection authority.
* [guidance note: include if the Reportable Conduct Scheme applies to your organisation] Report any allegations or convictions of child abuse by employees under the Reportable Conduct Scheme requirements [VIC, NSW, ACT].
* Obtain and record the lodgement/engagement number after making the notification.
 | CEO/Head and the employee or contractor who identified the child safety concern. |
| 5 | * Log and store the information, including lodgement number,in a safe and secure location that is accessible to the CEO/Head and Child Safety Officer.
* Undertake a learning review of policies, procedures, and practice.
* Information is provided to the board as part of the board’s periodic update on child safety.
 | CEO/Head |

If in doubt of external reporting requirements, *[Organisation name]* expects that staff, volunteers and contractors will contact their line manager, Child Safety Officer, the CEO/Head and/or external authorities to report any concerns and seek guidance on reporting obligations and processes.

Once a report has been received and the CEO/Head has been notified, the concerns will be reviewed. There are four possible outcomes from this review:

* The concerns are unfounded.
* A crime has been allegedly committed.
* The Child Safe Code of Conduct has been breached, but no alleged crime has been committed.
* Based on the available information, it is not possible to form a conclusive view on the matter.

As per the Child Safe Reporting Procedure and Child Safe Code of Conduct:

* Alleged criminal matters will be referred to the police as soon as practicable, and typically within 24 hours.
* Where a conclusive view could not be formed but the concerns are serious, child protection authorities and/or the police will be notified as soon as practicable, and typically within 24 hours.
* The CEO/Head will determine the course of action where the Child Safe Code of Conduct has been breached, but no alleged crime has been made. In such circumstances, *[Organisation name]* will investigate the matter and any consequences for the alleged perpetrator will typically be proportionate to the breach, with the child’s safety being of paramount significance.

## Responding to wellbeing concerns

While disclosures of child abuse may be made to an employee, there may also be general ‘wellbeing concerns’ that are not necessarily examples of child abuse that may be raised with employees.

Mental health and emotional wellbeing are as important to a child’s safety as their physical health. They can affect all aspects of their life including their educational attainment, relationships and physical wellbeing. Mental health can also change over time, to varying degrees of seriousness, and for different reasons.

Negative experiences, such as abuse or neglect, can adversely impact a child’s mental health. Such issues can also sometimes lead to safeguarding and child protection issues – for example if a child’s mental health begins to put them or other people at risk of harm.

It can be hard to recognise when a child needs support with their mental and emotional wellbeing and it can be difficult for young people to speak out about the challenges they are facing. It is crucial that anyone who works or volunteers with children and young people can recognise that a child might be struggling with their mental health and know how to take appropriate action to facilitate and provide support.

By being attentive to a child or young person’s mood or behaviour, employees can sometimes recognise patterns that suggest they might need support. It is important to remember that some signs of mental health may also look like normal child behaviour (for example, tantrums or frustration in younger children or teenagers keeping thoughts and feelings to themselves).

Signs of child/young person’s mental health and/or wellbeing issues include:

* sudden mood and behaviour changes
* self-harming
* unexplained physical changes (such as weight loss or gain)
* sudden poor behaviour or performance
* sleeping problems or showing signs of fatigue
* changes in social habits such as the withdrawal or avoidance of friends and family
* changes in eating habits
* reduced ability to concentrate
* changes in appearance (wearing oversized clothes, covering up).

These signs suggest that a child may be struggling, but there could be a number of explanations for them.

It is important that employees do not attempt to diagnose mental health or wellbeing issues or make assumptions about what’s happening in a child’s life.

If employees are concerned that a child may be struggling with an issue, it is important not to wait for them to talk before trying to start a conversation. Be prepared that conversations may not be easy or straightforward.

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| Principles to help employees discuss mental health and wellbeing sensitively |
| * Use the right language:
* Use language the child understands according to their age and stage of development.
* Avoid using technical or diagnostic language which children might find unfamiliar and confusing.
* Reflect the terms and language the child uses back to them; this will help them feel listened to.
* Create an open environment:
* Make sure children know and understand who they can talk to.
* Ensure mental health and wellbeing are discussed in a day-to-day way with it being put on an equal footing with physical health.
* Promote mental health and wellbeing:
* Encourage self-care and self-regulation techniques.
* Maintain routines.
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If a child is not able to engage in a conversation about their mental health and wellbeing, employees must still consider what support can be put in place for them.

If employees identify a safeguarding or child safety issue, you must follow *[Organisation name]* reporting procedures.

### Managing situations of concern

Whilst it is not possible to provide examples to cover all eventualities or issues, the following are some guidelines for common situations that may arise.

#### Children getting dressed/undressed in communal areas whilst changing clothes

Getting changed can cause anxiety for some children and/or make them feel vulnerable.

Where possible, use designated single-gender changing rooms or areas. If this is not possible, think about using furniture or screens to provide separate areas and allocating time slots of when people are getting changed/using the facilities. Ensure adequate and sensitive arrangements for getting dressed. Also take into account the needs of children and young people with disabilities and children from different religions, beliefs and cultural backgrounds or gender identity.

Adults should change privately and never in the same space as children and young people. As far as possible, members of staff should only supervise/assist children of the same gender.

#### Managing a disclosure of suicidal ideation/risk

Employees must always ensure they understand and know of their duty of care and reporting obligations.

If employees feel the child is in immediate danger call 000 and stay with them until they are safe.

If a child is having thoughts of suicide and discloses these, it may feel overwhelming but there are ways you can support them.

* Take warning signs and disclosures seriously.
* Listen without judgement and show that you care and that they are not alone.
* Be open to talking about their suicidal thoughts.
* Be aware of confidentiality and the limitations of this.
* Follow *[organisation’s name]* reporting policy and procedure.
* Raise the issue with a supervisor and/or the head of the organisation.
* Ensure the young person remains with a supportive adult whilst a safety plan can be developed.

#### Managing incidents of self-harm (through observation or disclosure)

Discovering a child has been self-harming either through disclosure, observation of historic injuries or presentation of an immediate injury, can be difficult and upsetting.

Self-harm is any act of intentional self-injury or self-poisoning. Examples include:

* taking an overdose
* swallowing objects or poisons
* cutting, hitting or bruising
* self-strangulation with ligatures
* burning.

Children and young people self-harm for several reasons which may include:

* to manage emotional upset
* to reduce tension
* to provide a feeling of physical pain to distract from emotional pain
* to express emotions such as hurt, anger or frustration
* a form of escape
* an effort to regain control over feelings or problems
* to elicit care from others
* to identify with a peer group.

#### Managing the immediate effects of self-harm

* Management of physical injuries:
* Keep calm and follow first aid guidelines for cuts, wounds or burns.
* If employees have immediate concerns about the effect of an overdose or serious physical injuries are present - call 000.
* Ask the child if they are in pain - they may have needed to feel physical pain at the point of self-harm but this doesn’t mean they want to feel pain afterwards.
* Helping the child/young person:
* Identify a staff member to whom the child is willing to speak and who can provide a listening, non-judgemental ear.
* Acknowledge the distress and offer to help the child find the support they need.
* Reassure the child that you understand that self-harm is helping them to cope at the moment.
* Remind them there are less harmful ways of coping.
* Mention sources of support (Kids Helpline, Youth Beyond Blue, talking to family member etc).

If you identify a safeguarding or child safety issue you must follow [O*rganisation name*]’s reporting procedures.

## Review

This reporting procedure was approved *[insert date]* and last reviewed *[insert date]*.