Understanding and Developing a Child Safe Policy

A handbook for child-related organisations

NSW GOVERNMENT

Office of the Children's Guardian

Contents

Overview

Children engage with organisations and services as part of their everyday lives. Sometimes they do this through choice, sometimes because of a family commitment and sometimes because they have a legal obligation, like school. Making these engagements safe requires prioritising children by being able to identify and prevent harm to them, and reporting it appropriately if it does occur.

The culture of an organisation has a significant impact on how the people who work there interact with children. If the emphasis is placed on safety and wellbeing then it is likely children are valued and respected. If the organisation demonstrates poor culture, or does not focus on child safety, children face increased risks.

Most people working or volunteering in child-related organisations have no intention of harming the children they work with. In some cases, though, a staff member's personal values may conflict with those of the organisation. Poor training, low levels of support and inappropriate governance can mean staff may be unaware of how to behave in a specific situation. Community attitudes, beliefs and behaviours can sometimes mean that abuse isn't detected or acted on. Providing clear and easy to understand rules and procedures to people who work with children and young people can help minimise the risk of harm. Leadership that champions the rights and wellbeing of children develops and employs effective policies and procedures so staff know what is acceptable and what is not. Where policies are ineffective and there is poor oversight, children are at greater risk.

The purpose of this handbook is to provide information and guidance to organisations that work with children, to help them create or improve their Child Safe Policy so it's robust and suitable for their individual organisation. A Child Safe Policy is the principal document needed so child-related organisations can protect children and young people from harm and abuse.

Child harm and abuse can have devastating effects. They can impact someone's life long into adulthood. Abuse can occur anywhere, including sports clubs, schools, religious spaces, camps and other kinds of places where children would expect to be safe.

It's the responsibility of all adults in NSW to report to the police and the Department of Communities and Justice (DCJ) if they suspect or believe a child is being harmed. This is called child protection. It's an organisation's response to a high-risk situation. It's often used in a family context as well. Taking steps to prevent abuse is known as being child safe. This describes what your organisation can do so harm and abuse are less likely to happen, and so perpetrators are more likely to be identified.

The Royal Commission into Institutional Responses to Child Sexual Abuse recommended organisations use the Child Safe Standards to help keep children and young people safe from harm and abuse.

A child safe organisation has localised policies and procedures that set out how it maintains a safe environment for children. Policies and procedures should address all aspects of the Child Safe Standards. The proper implementation of child safe policies and procedures is a crucial aspect of facilitating an organisation's commitment to child safe practices.[1]

Purpose of this resource

This handbook will provide you with information about:

- how to declare your commitment to being a child safe organisation with a Statement of Commitment to Child Safety
- the structure of a Child Safe Policy
- the elements of a Child Safe Policy
- how to identify and manage matters of high risk
- how to develop a Child Safe Policy
- how to communicate a Child Safe Policy.

The handbook is intended to support leaders in an organisation so they can be clear about their child safe culture whenever staff and volunteers are working with children.

A Child Safe Policy should underpin the implementation of the Child Safe Standards. It will help organisations meet their child safe responsibilities under the Child Safe Scheme. This handbook looks at how it does this and describes what it should contain. We explain why its different components are necessary.

Different organisations will need to approach policy creation differently. Larger organisations will naturally require larger, more detailed policies. All these documents are child safe policies as their intention is to keep children safe. However, larger organisations may use one overarching Child Safe Policy as the guiding document that references other specific policies, such as for recruitment, risk management, their reporting obligations and more. These documents are separate from their standalone 'Child Safe Policy'.

Smaller organisations may enshrine their entire approach to child safety in their Child Safe Policy, which will contain all the elements needed to keep children safe. It may, for example, explain their Code of Conduct, outline their Working with Children Check (WWCC) obligations and include a Statement of Commitment to Child Safety. As no two organisations are identical, each will have a different approach to child safety. This is why the Office of the Children's Guardian (OCG) has created a range of resources to support organisations in the creation and use of *all* their policy documents.

Organisations should decide which policies to incorporate into their Child Safe Policy, and which to keep separate. These decisions will depend on the nature and scope of each individual organisation. In general, recruitment, staff and volunteer training, and reporting obligations are better represented as standalone policies.

This handbook is part of a collection the OCG has developed to help organisations be child safe.

A guide to the
Child Safe Standards

Office of the Children's Guardian

Empowerment and participation
A guide for organisations working with children and young people

Office of the Children's Guardian

Risk Management and the Child Safe Standards
Part 1: Responding to risk
A resource for child-related organisations

Office of the Children's Guardian

Codes of Conduct:
a guide to developing child safe Codes of Conduct

Office of the Children's Guardian

Engaging sensitively with survivors of abuse
- A guide for faith organisations

Office of the Children's Guardian

The Child Safe Standards

The Royal Commission heard from more than 8000 survivors of abuse aged between seven and 93 years old. It identified over 4000 organisations where abuse had occurred. Thirty-two per cent of these were government organisations. It found that it takes an average of 23.9 years for a survivor to disclose that abuse has occurred.

As a result of its research, the Royal Commission developed the Child Safe Standards to articulate the essential components of a child safe organisation. The Child Safe Standards should guide what organisations need to do to be child safe. By establishing what is best practice and setting benchmarks to chart progress, organisations work towards becoming child safe.

Child-related organisations in NSW should apply the Child Safe Standards as their basis for keeping children and young people safe from harm and abuse.

In February 2022 the NSW Government introduced the Child Safe Scheme. It aims to protect children by encouraging organisations to adopt the Standards as a primary framework for child safe practice. The scheme intends to help raise awareness and create training relating to the Standards, and to allow the OCG the capacity to monitor and report on the compliance of child-related organisations in adopting the Standards. Application of the Standards will assist organisations to improve their systems for the prevention, identification and reporting of abuse.

The Standards also support the need for child safe policies, and the next section describes how each Standard is relevant in how policies are created, used and improved.

Child Safe Standard 1

Child safety is embedded in organisational leadership, governance and culture

How child safe policies apply to the Standard
Leaders require the use of policies and procedures in their organisations. By creating or supporting policies that reflect the intention of the Child Safe Standards, leaders demonstrate their commitment to them. They model their own behaviour on the way they expect others to act when working with children and young people.

If it's not applied
Leaders who fail to implement robust child safe policies demonstrate to workers and volunteers that policies, and by inference the Child Safe Standards and children, are not important. In these environments, children are more vulnerable to abuse.

If it's applied
Where leaders insist on and model compliance with child safe policies, they demonstrate that the safety of children is a priority. Children, young people, workers, volunteers and anyone else interacting with the organisation should demonstrate compliance to child safe policies. In these situations, children are safer.

Reflective questions:

- How do leaders champion a child safe culture in your organisation?
- How do leaders ensure you have effective child safe policies?
- How do leaders set expectations of how your staff behave towards children?
- How are your workers supported to share the responsibility of keeping children safe?
- How do your policies reinforce the importance of leadership as a vital component of keeping children safe?

Child Safe Standard 2

Children participate in decisions that affect them and are taken seriously

How child safe policies apply to the Standard

Children and young people are given ongoing opportunities to have input into the creation and improvement of child safe policies. This occurs through consultation that supports their participation in the organisation, empowering them in an environment where they feel their views and opinions are valued. This helps them understand they are valued. Child safe policies reflect the child empowerment goals of the organisation.

If it's not applied

If children feel powerless to speak up in an organisation about things they believe need improvement, they won't feel as valued. This may mean they are less likely to report abuse or call out potential situations where abuse could occur. In these environments they are more vulnerable to harm and abuse.

If it's applied

Where leaders insist on and model compliance with child safe policies, they demonstrate that the safety of children is a priority. Children, young people, workers, volunteers and anyone else interacting with the organisation should demonstrate compliance to child safe policies. In these situations, children are safer.

Reflective questions:

- What opportunities do you offer children and young people to participate in your organisation at a level where they have input in decision-making?
- What opportunities does your organisation offer to children and young people to provide feedback on their experience of your service and how do you act on this information?
- How do your staff demonstrate they understand the importance of children's views and opinions?
- How do you elicit the views of children of all ages, abilities and cultural backgrounds?
- Are children given the skills so they are better able to understand their feelings and, if so, how does this occur? If they aren't supported in this way, why not?
- How does your organisation encourage children to raise any concerns they have?
- How do your policies reflect the importance of empowering children and young people?

Child Safe Standard 3

Families and communities are informed and involved

How child safe policies apply to the Standard

Families know their children best and should be consulted during the creation or reviewing of child safe policies. In turn, policies should also reflect this intention. Families and community members who are invited to have some oversight of organisations (such as involvement in child safe committees) should also ensure policies are reviewed regularly and after critical incidents. They should ensure policies reflect the organisation's ambition of keeping children and young people safe from harm and abuse.

If it's not applied

Families and communities who are excluded, or who find it difficult to participate in child-related organisations, are unable to incorporate their knowledge and understanding of their children into the organisation's policies and procedures. When this occurs, some children may not have their needs met. This places them in a position of higher risk. In these situations, they are less safe.

If it's applied

Where families and communities are involved, information can flow from community members to the organisation that supports the creation of fit-for-purpose child safe policies. Families and communities can have input into initiatives and strategies that support the children the organisation cares for. Information can also flow back to families and communities from the organisation, if necessary. In these cases, children are safer.

Reflective questions:

- How are codes of conduct, and child safe policies and procedures made accessible to families and community members?
- How are families and communities consulted during your policy creation or review processes?
- How do your policies reflect the importance of involving families and communities in your organisation?

Child Safe Standard 4

Equity is upheld and diverse needs are taken into account

How child safe policies apply to the Standard
By supporting equity and diversity, organisations can help ensure all children they work with and care for have their needs understood and met. Part of this process means creating and abiding by policies that reflect the diverse needs present in your organisation.

If it's not applied
Children and young people who are more vulnerable to abuse because of their age, intellectual ability, physical ability, cultural background, sexuality or other reasons may be more vulnerable to harm if child safe policies don't provide ways to support them by reflecting their specific needs. In these cases, they are less safe.[2]

If it's applied
All children should be provided with equitable opportunities to participate to the greatest extent they are able to. For this to happen, organisations need policies and procedures in place that support the rights and needs of all children. Not only will this allow them to flourish as individuals, but it will help protect them as their vulnerabilities will be recognised and understood. Child safe policies should reflect the intention that all children have access to information, support and complaint mechanisms so they can speak up and be heard. Furthermore, the policies demonstrate organisations know how to respond to any concerns they raise.
In these environments the wellbeing of children and young people is improved, and they are safer.[3]

Reflective questions:

- How does your organisation identify children with vulnerabilities and establish their needs?
- How is your workforce supported to understand the links between a child's vulnerabilities and their increased risk of being harmed?
- How are your children given skills and tools to communicate their views and needs?
- How does your organisation adapt and respond to the diverse needs of children to understand their vulnerabilities so they can be kept safer?
- How does your organisation encourage children to have positive discussions about diversity?
- How are children provided equitable opportunities to participate in your organisation?
- How do your policies reflect the importance of supporting equity and diversity?

Child Safe Standard 5

People working with children are suitable and supported

How child safe policies apply to the Standard

Candidates for roles in the organisation should describe their understanding of the importance of policies and procedures as part of the recruitment process. Position descriptions and job advertisements should describe how the organisation is child safe, which will emphasise the importance of having child safe policies. Robust job interviews and subsequent screening measures, such as validating their Working with Children Check (WWCC) and relevant police checks, should be part of the interview process for prospective candidates. Successful candidates should then be offered appropriate induction, training and supervision. These measures should be reflected in the organisation's human resources (HR) policy and reinforced in their Child Safe Policy, which should support all staff to understand their child safe responsibilities.

If it's not applied

Staff and volunteers who have a limited understanding of the role of policies and procedures are less likely to follow them, and more likely to condone the behaviour of, and fail to report others, who do not follow them. Children are less safe in these environments.

If it's applied

Staff and volunteers who are suitable and supported are more likely to understand and comply with policies and procedures. They will consider them a priority. Organisations will attract adults who value the safety of children and discourage those who may seek to harm them. In these environments, children are safer.

Reflective questions:

- How do your recruitment processes explore your applicants' attitudes towards policies and procedures?
- How are responses to your policies and procedures monitored and recorded during staff probationary periods?
- How does your induction process help your staff understand your policies and procedures, and their obligations to comply with them?
- How do you supervise and support your staff to follow your child safe policies?
- How do your policies reflect the need for staff to be suitable and supported?

Child Safe Standard 6

Processes to respond to complaints of child abuse are child focused

How child safe policies apply to the Standard

Child safe policies should address what responses an organisation will put in place if those who interact with children and young people breach its policies, procedures and codes of conduct. Policies should also describe what reporting mechanisms exist for adults, children and young people.

If it's not applied

If children and young people do not feel supported to report abuse, they are less likely to bring it to the attention of those who can help them. They are also less likely to report if they don't trust the systems the organisation has in place once a report has been made. Where opportunities to support children and young people are lost, children are less safe.

If it's applied

Child safe organisations should have reporting mechanisms that are accessible to all children and young people in their care. Children know what they should report because there are clear rules about how adults should behave, which they have had explained to them in an age- and ability-appropriate way. They have also been told about what will happen after they make a disclosure. By responding with investigations that are fair, timely and confidential, this should encourage them to trust the systems the organisation has in place to support them. A Child Safe Policy should state the need for reporting mechanisms and link to other relevant policies. Children are safer in these environments.

Reflective questions:

- How do you make your complaint handling process publicly available and accessible?
- How do you make your staff aware of their internal and external reporting obligations, including reportable conduct?
- How do you record complaints about child abuse?
- How do you embed a culture of reporting?
- How do you support families after a concern is raised?
- How do you support staff after a concern is raised?
- What mechanisms do you have in place to ensure the confidentiality of complaints and the investigative process?
- How are adults supported to understand the processes and possible outcomes if an allegation is made about them?
- How does your Child Safe Policy support child-friendly reporting processes?
- How are your policies and procedures regarding reporting reviewed and updated?

Child Safe Standard 7

Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training

How child safe policies apply to the Standard
Adults who work with children and young people are given information and training on the organisation's policies and procedures. They know how to follow them and understand why they are important. They may also be given training on how to recognise and respond to abuse.

If it's not applied
If workers and volunteers don't understand the importance of policies and procedures, the organisation has limited, or no, child safe structure. If policies aren't child safe, this indicates an organisation does not prioritise children. If staff aren't trained to understand the importance of policies, or can't recognise that they're not working as intended, children are less safe.

If it's applied
Staff and volunteers should be trained to understand and enshrine the use of policies and procedures, to help keep children and young people safer. Staff should feel supported to contribute to policy development and reviews, to follow all the policies of the organisation, and to report any breaches they observe. In these environments, children and young people will be safer.

Reflective questions:

- How are staff trained to effectively implement your organisation's policies and procedures?
- How do you record staff participation in training?
- How do you provide extra support in policy development for staff working in higher-risk roles and situations, including working with children with vulnerabilities?
- How do you know your staff are trained to report breaches of policy?
- How do you ensure that short-term casual, agency or contract staff are properly inducted and know the expectations of your organisation in terms of the policies you have in place?
- How are your workers trained to recognise indications of child harm, including harm caused by other children and young people?

Child Safe Standard 8

Physical and online environments minimise the opportunity for abuse to occur

How child safe policies apply to the Standard
Child safe policies should help to ensure all workers, volunteers, children and young people understand the risks of both physical and online environments. It should ensure they are given age- and ability-appropriate information on how to report any concerns they have.

If it's not applied
Children can be exposed to potential harm in both physical and online spaces. Physical spaces will allow situations where they can be alone with potential abusers. Online spaces will allow potential abusers to contact them. In both spaces, grooming may be more likely to occur and children will be less safe.

If it's applied
All stakeholders, to the best of their ability, should be aware of the rules about contact between adults and children. These are described in codes of conduct and child safe policies. They should be given information on what is, and what isn't, acceptable behaviour in physical and online spaces. This will support stakeholders to report instances where the rules have been broken. In these cases, children are safer.

Reflective questions:

- How do you assess and manage risks in both physical and online environments without compromising the right of children to privacy while allowing them to access information, appropriate social connections and learning opportunities?
- How do you consult with children and young people about their views on safety in physical and online environments?
- How do you educate your workforce and parents about behavioural expectations, including online safety?
- How do your policies support the education of children and young people around how to stay safe in online environments?
- How do your policies address the balance between the need for privacy and the need to provide a safe environment for children?

Child Safe Standard 9

Implementation of the Child Safe Standards is continuously reviewed and improved

How child safe policies apply to the Standard

Child safe organisations face the challenge of creating, maintaining and improving child safe culture in varied and dynamic environments. They have systems in place that allow them to monitor and improve their implementation of the Child Safe Standards. They should encourage discussion of difficult issues, and identify and learn from any mistakes they make. Critical incidents should be seen as opportunities to identify the root cause of a problem and then improve relevant policies and procedures. Where appropriate, organisations should obtain advice from specialists to investigate failures and recommend improvements.

If it's not applied

Organisations that fail to have robust child safe policies in place, or don't undertake reviews of their policies, are not applying the Child Safe Standards. In these cases, children are less safe.

If it's applied

The Child Safe Standards provide a framework so organisations can create environments that are child safe. Applying the Standards allows all stakeholders (staff, volunteers, children, family and community members) in a child-related organisation to understand the importance of policies and procedures. Children are safer in organisations where this takes place.

Reflective questions:

- How do you stay up to date with current best practice child safe strategies and initiatives?
- How do you change policies and procedures to reflect changes to child safe practices?
- Do you review your child safe policies and procedures following a complaint?
- Has an independent agency ever reviewed your child safe policies and practices?
- How would you conduct a root cause analysis after a critical incident and incorporate its findings into your policies and procedures?
- How does your Child Safe Policy reflect your intention to apply the Child Safe Standards?

Child Safe Standard 10

Policies and procedures document how the organisation is child safe

How child safe policies apply to the Standard
Having effective policies and procedures help to ensure adults, children and young people know the behaviour that is expected of them in an organisation. They should describe all the scenarios where children are at risk of harm and abuse, and describe what is in place so children remain safe. They should also be accessible and easy to understand.

If it's not applied
In organisations where policies do not exist, are not adequate or are not applied, there is less understanding of how the organisation intends to keep children safe. Opportunities to exploit children exist because adults are not aware of what is acceptable, and what is unacceptable, behaviour. In these situations, children are less safe.

If it's applied
Robust policies and procedures that are clearly communicated underpin an organisation's commitment to keeping children and young people safe. In places where there are good policies and procedures, which are understood and applied, children are safer.

Reflective questions:

- How do you make your child safe policies and procedures specific to your organisation?
- How do your leaders champion a culture of compliance with your child safe policies and procedures?
- Have you made your child safe policies and procedures publicly available and easy to understand?
- How do staff implement your child safe policies and procedures?
- How do you know staff are applying child safe policies and procedures?
- How are child safe policies, procedures and codes of conduct embedded in all operational aspects of your organisation?
- What happens if policies and procedures are not followed?

How does a Child Safe Policy support a child safe culture?

The Royal Commission into Institutional Responses to Child Sexual Abuse identified a Child Safe Policy as a key document in establishing an organisation's approach to keeping children safe from harm and abuse. A Child Safe Policy should demonstrate how an organisation values children and describe how it intends to embed child safe practices into its day-to-day activities.

A Child Safe Policy should be part of your suite of child safe documents, which also include:

- your Statement of Commitment to Child Safety, which describes your child safe values
- your Child Safe Code of Conduct, which lists acceptable and unacceptable behaviours
- your Child Safe Reporting Policy, which details your reporting and investigation processes
- your Child Safe Recruitment, Induction and Training Policy, which describes how you recruit suitable workers, and how you onboard, support, supervise and train them
- your Child Safe Risk Management Plan (CSRMP), which identifies and aims to reduce specific risks within the organisation.

Prioritising the safety of children and young people

Children's safety should be the most important focus of any child-related organisation. This is known as the **paramountcy principle** and it should be evident in all aspects of an organisation, including its stated values, how it is championed by leaders, and how it is embedded into everyday practice.

An organisation's Child Safe Policy is the starting point for meeting this obligation. It should describe how transparent processes need to be in place so the safety and welfare of children is clearly identified as being at the heart of the organisation's decision-making. The policy should clearly define the roles and responsibilities of all adults interacting with children and young people. It should describe the manner of the interactions and what is acceptable, and not acceptable, behaviour. It should state the intention of the organisation's risk management processes, and link to any documentation the organisation has in place to reduce or eliminate risk. It should describe the organisation's reporting obligations, both internal and external. If a Child Safe Reporting Policy exists, the Child Safe Policy should link to it and reference relevant sections. It should sit alongside your other child safe documents (as described above).

It is important to note that the policy should describe *how* it is intended to be used. The final report of the Royal Commission into Institutional Responses to Child Abuse mentions more than once that in some cases where children were harmed, organisations had policies in place to protect children and young people but no one applied them, or they failed to understand them. If these policies had been clearly communicated then the harm some children underwent might have been prevented.

As mentioned, leadership is a crucial part of creating, maintaining and improving child safe cultures. Leaders should model their commitment to keeping children safe by applying and adhering to their organisation's child safe policies. When the leadership team of an organisation doesn't value the safety of children, the Child Safe Policy may quickly become just another document gathering dust on a shelf.

Leaders should demonstrate the value of a child safe culture in how policies are applied, but also in how breaches of policies and codes of conduct are dealt with.

LEADERSHIP

CHILD SAFETY

APPLYING THE CHILD SAFE STANDARDS

POLICIES AND PROCEDURES

Child safe organisational culture

The term 'organisational culture' refers to how an organisation operates on a day-to-day basis and it isn't a tangible asset. Rather, it's a pattern of shared values, beliefs, assumptions and behaviours that workers follow when establishing an appropriate way to think and act within an organisation. An organisation's policies and procedures play an important part in creating, maintaining and improving an organisational culture.

Organisations can engage workers from different communities. As a result, staff and volunteers may bring a variety of personal values and belief systems to an organisation. While a diverse workforce has many benefits, it also reinforces how important it is for an organisation to establish its own culture and set of values so no staff member is left unclear about how they should behave around children. This showcases the priority an organisation sets on valuing and protecting children.

A child safe culture is:

- a commitment by all staff to a shared purpose, value, mindset and set of behaviours, where children and their safety are placed at the heart of the organisation
- shown in how leaders establish and reflect the paramountcy principle through their behaviours

- seen in how the safety and wellbeing of children is embedded into all policies and procedures an organisation implements
- demonstrated in an organisation's rituals, stories and day-to-day practices
- seen in an organisation's relationships with colleagues, children, young people, families, community members and other stakeholders.

When an organisation does not have a culture that values and protects children, then adults in the organisation can be unsure about what is appropriate behaviour. They may even feel the organisation is prepared to tolerate harm and abuse. The Royal Commission into Institutional Responses to Child Sexual Abuse found that organisational culture plays a major role in how children are treated. It influences and drives the way things are done and the way issues are responded to. Child safe cultures create environments where it becomes more difficult to abuse and where it's easier to detect abuse if it occurs. Ultimately, policies and procedures are a way for organisations to document how they intend to create, maintain and improve a child safe culture.

What makes a child safe organisation?

Based on the paramountcy principle that demonstrates a clear commitment to child safety through shared purpose, values, mindsets and behaviours

Established and demonstrated by the words and actions of leaders

Created, maintained and improved in the organisation's policies and procedures

Visible in the relationships held by the organisation and all its stakeholders

Visible in the organisation's rituals, stories, intentions and day-to-day practices

WHAT MAKES A CHILD SAFE ORGANISATION?

Reflective questions:

- How are adults in your organisation supported to understand the paramountcy principle in the context of your organisation?
- How does the organisational culture in your child-related environment ensure a focus on child safety?
- What policies does your organisation currently have in place to support the right of children and young people to be safe?
- How do the policies in your organisation align with, and reference each other, to ensure all aspects of child safety that need to be covered are covered, and that there are no gaps or inconsistent messages?
- How do your policies and procedures outline how you will manage an allegation when abuse has been detected in your organisation in relation to providing support for a child and family, and describing what fair work procedures will be followed for the accused staff member?

Case study

On investigating an employee who was alleged to have abused children, it was found failures to follow the organisation's recruitment policy meant the employee's previous record of child harm was not picked up.

Failures of other staff to understand child safe policies meant there were many breaches that were not recorded, including giving gifts to children and having favourites, taking on secondary employment as a babysitter, and having out-of-hours contact at birthday parties.

A failure of management to prioritise child safe reporting or to follow the organisation's policy meant when breaches were observed, they were not recorded or appropriately responded to.

Had adequate policies been in place, and had staff and management understood and responded to the policies appropriately, children in the organisation may not have been harmed.

Adapted from the Royal Commission into Institutional Responses to Child Sexual Abuse

Image used on this page is commercial photography and not an actual picture of people who have been exposed to, or perpetrated, abuse.

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Statement of Commitment to Child Safety

In February 2022 the NSW Government introduced the Child Safe Scheme which allows the OCG to have oversight of how organisations in NSW work towards keeping the children they interact with safe. Ways they can show this include having a Statement of Commitment to Child Safety (sometimes also known as a Child Safe Commitment Statement) and a Child Safe Policy. Some organisations will place the statement within the policy, others may choose to have it as a standalone document.

Having a standalone document means it can be published on your website and social media, and placed on noticeboards as a poster. It should remind all your stakeholders of the shared commitment to keep children and young people safe. It's important staff, children and their families are aware it exists, and can access it, understand it and act in ways that embed the purpose of the statement into their day-to-day practices.

The statement should:

- provide staff with a clear understanding of how the organisation values children and young people
- uphold the rights of children to be in a safe and nurturing environment
- reflect the organisation's values and aims
- set the tone for the child safe culture of the organisation.

A Statement of Commitment to Child Safety displays an organisation's set of core values that underpin and inform the organisation's approach to child safety. It guides:

- the prevention and reporting of abuse
- the attitudes and behaviours of leaders and staff
- decision-making within the organisation in a way that puts children first
- day-to-day operations, including recruitment practices, complaint handling processes, and education and training of staff as well as physical and online safety.
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How do your values demonstrate your organisation's commitment to keeping children safe?	The following values should be at the heart of any approach that prioritises children's safety: - child abuse is not tolerated and must not happen - the best interests of the child and their protection from harm is paramount - children's rights are understood and respected - all concerns, whether raised by adults or children, are treated seriously and acted on - reporting abuse is mandatory and encouraged — it is never obstructed or prevented.
How do leaders demonstrate these values in the operations of the organisation?	Having a leadership team committed to providing safe environments means children are less likely to be exposed to harm and abuse. A child safe culture is a set of values and practices that guide the attitudes and behaviour of all staff. Good leaders champion these values and embed them in organisational governance. Leaders may choose to sign the organisation's Statement of Commitment to Child Safety to publicly demonstrate that child safety is central to the organisation's operation and purpose.

Components of a Statement of Commitment to Child Safety

Statement of intent

Examples:

- we are committed to providing a safe environment for children and young people
- the safety and wellbeing of children is central to all our decision-making
- our service is committed to child safety
- we have a zero tolerance approach to child abuse
- all children and young people have a right to feel safe and be safe.

Underpinning values

Examples:

- our approach to preventing harm is embedded in our policies and procedures
- we are committed to a culture where the safety, wellbeing and participation of all children and young people we work with are paramount.

Additional values

Examples:

- we are committed to providing children and young people with an environment where they feel safe, and are listened to and believed
- we are committed to supporting the cultural safety of all children and young people, including First Nations children and children from culturally and linguistically diverse (CALD) backgrounds
- we are committed to providing a safe and inclusive environment for children with disability
- we believe all children are unique and have the right to be protected.

Demonstration of intent

Examples:

- we invest in our staff and volunteers to ensure they are supported to have the skills, knowledge and confidence to be child safe
- we seek to incorporate the views and opinions of children and young people when developing a safe place for them
- we welcome comments, compliments and complaints from children, their families and the community to guide how we work to protect children.

Description of how your plans, decision-making and day-to-day operations support your intention

Examples:

- we will take a preventative, proactive and participatory approach to child safety
- we value and empower children to participate in decisions that affect their lives
- we foster a culture of openness that supports the safe disclosure of risks of harm to children
- we respect diversity in cultures and child-rearing practices while keeping child safety paramount
- we provide written guidance on appropriate conduct and behaviour towards children
- we engage only the most suitable people to work with children, and have high-quality supervision and professional development of our staff and volunteers
- we make sure children know who to talk with if they are worried or are feeling unsafe
- we support children and young people to be comfortable and encouraged to raise any issues that concern them
- we report suspected abuse, neglect or mistreatment promptly and lawfully to the appropriate authorities
- we share information appropriately and lawfully with other organisations where the safety and wellbeing of children is at risk
- we value the input of, and communicate regularly with, families and carers
- we review our policies and procedures at least annually to ensure our staff have clear and relevant guidance on appropriate behaviour with children.

Sample Statement of Commitment to Child Safety

Southern Hill Water Polo Club Commitment to Safeguarding Children and Young People

Our club provides a child safe culture by supporting children and young people, their parents, guardians, families and communities, and by ensuring all staff and volunteers who work with Southern Hill Water Polo Club are committed to safeguarding children and young people.

Our commitment to children and young people

We intend to:
- provide a safe and supportive environment
- ensure that the experiences of children and young people are free from any form of harmful conduct, including child abuse, neglect or grooming
- empower children and young people so they feel able to respond to any behaviour that is not acceptable
- ensure children and young people know who to approach if they feel unsafe or have any child safety concerns, including abuse, neglect and grooming
- provide age- and ability-appropriate codes of conduct to everyone who interacts with our club
- establish a reporting framework so reports are:
  - easy to make for anyone in the club
  - responded to in a timely and fair manner
  - recorded appropriately
  - forwarded to relevant authorities where necessary
- provide support for any children and young people who report or are suspected of being exposed to concerning conduct, including abuse, neglect or grooming.

Our commitment to parents, carers, families and their communities

Southern Hill Water Polo Club is committed to supporting all the adults involved in our club, to keep children and young people safe from harm and abuse.
We intend to:
- communicate with adults involved in our club our expectations around creating, maintaining and improving a safe environment for children and young people
- share information with adults about keeping children and young people safe, including:
  - where they can find further information and advice
  - how to make a report if they suspect or know a child is being harmed, or if they observe a breach of our codes of conduct.

Our commitment to being a child safe organisation

We intend to:
- ensure that Southern Hill Water Polo Club players and staff follow our codes of conduct by:
  - making them publicly available
  - educating all our stakeholders about the importance of following them
- use child safe recruitment processes that include a Working with Children Check (WWCC) and other screening checks as appropriate for adults who require them
- induct all our stakeholders so they recognise their role in keeping children and young people safe, and ensure there are ongoing learning and development opportunities related to child safety
- take steps to ensure Southern Hill Water Polo Club staff and volunteers do not engage in concerning conduct with children and young people
- ensure that all Southern Hill Water Polo Club stakeholders know how and when to report any concerns, complaints or allegations of concerning conduct, including abuse, neglect or grooming
- ensure that all Southern Hill Water Polo Club participants are provided with appropriate support if they are exposed to, or report, abuse, neglect or grooming.

Practical steps to developing a Statement of Commitment to Child Safety

Step 1

Gather people in the organisation with relevant experience or skills, and from different parts of the organisations, including leaders and frontline workers. Including children in this process is important, too. (The OCG's *Empowerment and Participation* handbook provides practical ideas for involving children in decision-making and can be downloaded from our website.) Support all those involved to understand the importance of the statement.

Step 2

Think about your organisation's core values. What do you want to be known for? How do children fit within that vision? How will you uphold the rights of children, and their families, carers and communities, to feel and be safe?

Step 3

Draft a Statement of Commitment to Child Safety using the information you've gathered and the examples provided above.

Step 4

Ask children and young people in your organisation their views on the draft document and provide them with a variety of age-appropriate ways to give feedback.

Step 5

Finalise your Statement of Commitment to Child Safety, including setting a review date (or after critical incidents or when other policies change).

Step 6

Communicate and publicise your Statement of Commitment to Child Safety. Consider how it will be promoted on your website, on posters around the organisation and in your newsletter. How are children supported to know about it? For example, are there conversations with adults about it or videos?

Step 7

Provide people with a way to report instances where they believe the organisation is acting in a way that does not align with the Statement of Commitment to Child Safety.

Ways you will know your statement is effective

- Leaders refer to the statement in how they describe the organisation when in staff meetings, external meetings or at your organisation's public events.
- If asked, workers know about and support your statement.
- Children and families refer to your statement when providing feedback or reporting concerns.
- Posters and other printed material referring to it are seen around your organisation's offices, facilities and events as well as being mentioned in your social media.

Reflective questions:

- Why is it important to have a Statement of Commitment to Child Safety?
- Does your organisation have a Statement of Commitment to Child Safety?
- Does your organisation's Statement of Commitment to Child Safety contain all the elements described above?
- How often is your organisation's Statement of Commitment to Child Safety evaluated and reviewed?
- Who in your organisation is responsible for communicating your Statement of Commitment to Child Safety, and does it reach all the people who engage with your organisation?
- How does your organisation communicate your Statement of Commitment to Child Safety?

Creating a Child Safe Policy

The Royal Commission into Institutional Responses to Child Abuse found the best way to identify and prevent abuse, neglect and grooming is by using policies and procedures that support a child safe organisational culture.

A Child Safe Policy provides a framework that demonstrates an organisation's commitment to child safety. It does this by outlining how the organisation intends to approach the safety of children through the development of procedures and codes of conduct.

The process of policy creation or review often depends on the size and nature of the organisation. Bigger and more complex organisations tend to have well-established systems in place for producing policies. This may not be feasible for smaller organisations. They may need more help to develop the required tools. The Child Safe Standards have been developed to support *all* organisations, no matter their size.

An effective Child Safe Policy contains many parts and may be a difficult document for some organisations to create. Some may attempt to use one provided by their peak body or association. While these may be a good starting point, they won't necessarily reflect an organisation's full needs. It may not go into enough detail for its individual environment. Child safe policies should look different from organisation to organisation as they are meant to reflect the specific services, activities, communications and interactions an organisation has with children and young people.

It can be daunting to create all the policies and procedures, codes of conduct and commitment statements you need, especially for sectors that are more regulated. Where possible, you should build on what you already have. Try to get as many people involved as possible. This not only lightens the load for individuals, but it also means you can draw on the expertise that may already exist in your organisation. For example, volunteers at a sports club may be police officers, educators or child care specialists who are already familiar with much of this material.

Keeping children safe is everyone's responsibility and the job of creating strong policies should be a shared one. A lot of organisations, especially those highlighted in the Royal Commission into Institutional Responses to Child Sexual Abuse, have already reviewed and updated their child safe documents and some of these can be found on the internet.

What follows in this section is a proposed structure for a Child Safe Policy. You should consider what parts are relevant for your organisation. If necessary, you may need to develop other appropriate policies and procedures, such as a Child Safe Reporting Policy or a Child Safe Recruitment, Induction and Training Policy. The OCG has resources to support you to create these, too.

Child-related organisations may look to borrow from the business world to incorporate different accepted work practices, and even vision and values statements, into their key policy documents. Most industries now use a range of policies to keep workers safe. They may even place reminders around the workplace to stress the importance of following the rules. Some organisations begin with a concept of 'zero harm'. Their policies stem from the belief that all workplace accidents are preventable. In many high-risk industries reminders are provided before every shift to reinforce safety at work. Frequently they also have 'tool box' meetings prior to commencing any hazardous jobs. The meetings attempt to identify any dangers and describe what safety measures need to be put in place before they start.

Of course, rules also exist in places where there aren't physical dangers. A bank, for example, will have many rules and codes of conduct that employees must follow to ensure their customers' money is kept safe from embezzlement and corruption.

Child-related organisations can look to model or adapt these concepts to create new and innovative ways to prevent harm. By helping you put in writing your organisation's commitment to keeping children safe, this handbook will support you to develop your child safe culture.

Child Safe Policy versus Child Protection Policy

A Child Safe Policy aims to prevent children being harmed in an organisation. A Child Protection Policy provides guidance on how to protect children who are suspected of being at risk of harm. For example, a school may have a Child Protection Policy that provides staff with guidance about what to do if they believe a child is being harmed at home. A Child Safe Policy provides staff with guidance on how to keep children safe.

You may feel having a Child Safe Policy is unnecessary as no one in your organisation would harm a child. However, a Child Safe Policy is still necessary as it demonstrates how your organisation values and respects children. It lets all your stakeholders know what rules exist for adults who interact with children and young people.

What is a policy?

A policy is a set of rules or guidelines for your organisation and employees to follow to achieve a specific goal, such as providing a child safe environment. Policies answer questions like: What is our intention? Why do we want this? What could happen if we don't have the policy?

What is a procedure?

A procedure is the counterpart to a policy. It is the instructions that bring the policy to life. Broadly speaking, a policy answers 'why' and a procedure answers 'how'. An effective procedure should outline what employees must do or not do, gives directions, sets limits, establishes principles and offers guidance for decision-making.

Practical steps to developing your Child Safe Policy

Step 1

Don't do this alone. Having a shared vision for the safety of children will result in a better outcome so gather together a number of people, including children, to design the elements of your child safe culture. Find out if any members of your organisation (teachers, social workers or police officers) have prior experience in child safety matters.

Step 2

Do your research. What have your peers already done? Can you ask them for help? Contact your peak body (while not relying on any standardised documents). Remember, this is *your* organisation and it has unique environments, activities and risks.

Step 3

Decide how people can contribute their ideas. What topics are you going to discuss? Are you going to hold workshops? Have surveys? How do you intend for children and young people to contribute?

Step 4

Decide who will manage the project. Who has oversight of the process? Who will you consult? Do you have a peak body or access to a child safety specialist?

Step 5

Communicate your results. How do you intend to inform people about your policy? Do you have access to people in your organisation who already work in communications and marketing? What are the most popular communication channels your organisation already uses to communicate?

Involving children and young people in decision-making is central to the Child Safe Standards, and involving them in the development of your Child Safe Policy is a great way to support them in becoming more empowered in your organisation. You can hold workshops to hear their views, or talk to them more informally while they're participating in your existing programs. Families and communities should also be invited to participate. Surveys and suggestion boxes are other ways to engage different people to help inform your policy.

You should invite feedback from all stakeholders who interact with your organisation about what improvements they feel could be made. These conversations should include your staff and volunteers, as well as parents and carers, and interested community members, particularly if you're in an area with higher populations of First Australians or CALD participants.

What should your Child Safe Policy include?

A Child Safe Policy should have the following sections:

- policy title
- purpose – why have this policy?
- Statement of Commitment to Child Safety – either include it in the policy or reference it (see previous chapter for more information on this document)
- scope and audience – who is affected by the policy?
- responsibilities – which roles in the organisation have oversight for child safety?
- definition of child abuse and harm – what are you hoping to prevent by having this policy?
- content – the body of your policy
- related policies – what other policies does your organisation have that relate to child safety?
- legal requirements – what laws and regulations does your policy conform to?
- human resources and recruitment practices – how can staff and volunteers be recruited and trained so they understand the importance of a child safe culture?
- publication – how do you intend to publicise the policy?
- evaluation and review – how do you know your policy is working and when do you intend to review it?

Your Child Safe Policy works with your Statement of Commitment to Child Safety to demonstrate how your organisation intends to keep children safe. Your Child Safe Policy should make it clear that all children and young people have a right to:

- be treated with respect and protected from harm
- be asked for their opinions about things that affect their lives and be listened to
- feel and be safe in their interactions with adults and other children and young people
- understand as early as possible what is meant by 'feeling and being safe'.

It is important that children and young people learn:

- about feeling safe and their right to be safe
- to recognise appropriate touching and inappropriate touching
- they have a right to say no to a person who touches them inappropriately or who threatens their safety
- that the abuse is never their fault
- to tell trusted adults about anything that makes them feel unsafe – they don't need to keep it a secret
- that help is available to them within their communities.
-

Developing a purpose statement

Having a well-developed Child Safe Policy will help document how your organisation upholds the rights of the child. Part of your Child Safe Policy is a description of its purpose. This is also a good place to reference your commitment to implementing the Child Safe Standards.

Sample purpose statement

- We are committed to providing a safe and inclusive place for children.

- We use the Child Safe Standards to underpin how we keep children safe.

- We uphold the rights of all children to participate to their full capacity, regardless of their gender, race, ability or cultural background.

- Supporting this document are other policies, procedures and codes of conduct that aim to identify and prevent behaviour that may be harmful to children and young people. These supporting documents have been developed to guide appropriate behaviour and encourage all staff, both paid and volunteer, to create, maintain and improve a child safe environment.

- This policy has been developed to protect children and young people. It includes guidance for people who work with them, in how to appropriately act when engaging with them.

- We encourage and support the participation of children and young people in the development and ongoing reviews of this policy. We understand that by listening to them we will better know how to keep them safe.

- Our leadership team promotes reporting any breach of our policies, procedures and codes of conduct, and will act to ensure the safety, welfare and wellbeing of children are upheld.

- Failing to observe this policy and any supporting policies, procedures or codes of conduct may lead to disciplinary action in accordance with our disciplinary policy.

- In the event of a breach of the law, the matter will be reported to NSW Police or other relevant government agency.

- The advice in this policy should be always followed. In the event of an emergency staff members should contact [name, position] as well as relevant authorities.

Reflective questions:

- Does your organisation have a Child Safe Policy?
- What messages do you want your Child Safe Policy to convey?
- Does your Child Safe Policy describe how children and young people are supported to have input into its creation, evaluation and review?
- What tangible actions does your Child Safe Policy contain that will work to keep children safe?
- How do the leaders in your organisation support the Child Safe Policy as the overarching document that works to keep children safe in your organisation?
- Does your Child Safe Policy describe what happens if it is not followed?
- How does your Child Safe Policy reference the Child Safe Standards?

Defining the scope and audience

Your Child Safe Policy should make clear who in the organisation is required to comply with it and reference any supporting policies that contribute to your approach to being child safe, including your Child Safe Code of Conduct. The scope should set out which of your stakeholders your documents apply to. You may, for example, have a Child Safe Code of Conduct for adults and a separate one for children and young people.

The scope should also describe the requirements your stakeholders are expected to meet.

Sample statement defining scope and audience

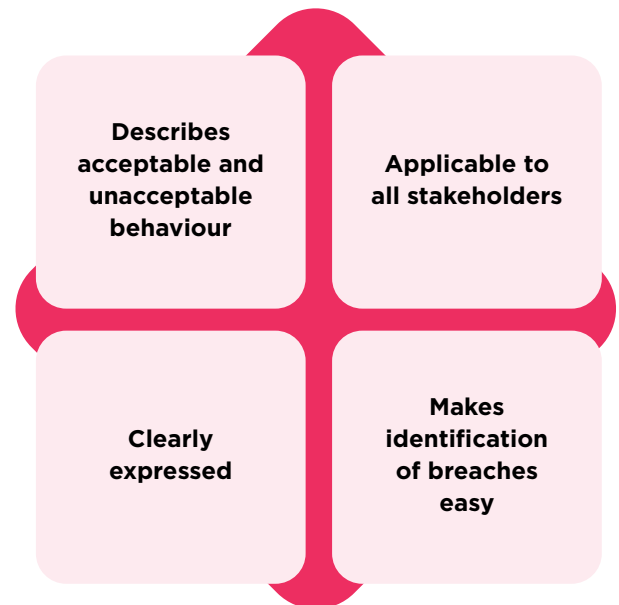**We require all workers, paid or unpaid, who work with children to:**

- comply with this policy and prioritise the prevention of harm to children and young people

- uphold the rights of children and actively empower them to participate to the best of their ability

- provide a safe and inclusive environment free from discrimination or harassment

- report any breach (of this policy, procedure or Child Safe Code of Conduct) to their manager

- take steps to ensure all children can actively contribute to the organisation regardless of their ability, race, gender or cultural background

- use positive and encouraging language when working with children

- refrain from language that is discriminatory, racist, sexist, offensive or belittling

- act on any concerns raised by a child that indicate they may be unsafe

- avoid situations that place children at risk of harm

- refrain from any conduct that is considered abusive, neglectful or grooming

- notify and seek approval for any interaction with a child outside our services, either professionally or personally, unless that child is a close family member

- hold a Working with Children Check (WWCC) clearance, unless exempt

- provide their WWCC number when requested for us to verify.

Some organisations may only have paid staff and some will have a mix of paid staff and volunteers. Your Child Safe Policy should make clear that it applies to all the adults in your organisation who interact with children as well as those in leadership positions who are responsible for their safety. By defining the audience you can think about the specific risks involved with each role and develop your policy to include guidance and procedures for each.

Child Safe Code of Conduct

Your Child Safe Policy should reference your Child Safe Code of Conduct. This is meant to guide the day-to-day behaviours of adults interacting with children and young people. You may also have a Child Safe Code of Conduct for children, to guide their interactions with each other and let them know what is expected of the adults around them. Typically, a Child Safe Code of Conduct includes 'I will' or 'I won't' statements. Codes of conduct are most effective when they're visible and kept simple. Some organisations will embed their Child Safe Code of Conduct within their Child Safe Policy, but it's recommended it be included as an appendix so it can also be used as a standalone document. It can then be posted around the organisation and sent out to staff separately to sign or acknowledge they have read and understood it.

A Child Safe Code of Conduct is an important child safe document. For help in developing it, there's more information in the OCG's codes of conduct handbook available on our website.

Describes acceptable and unacceptable behaviour

Applicable to all stakeholders

Clearly expressed

Makes identification of breaches easy

Examples of harm and abuse, and indicators of abuse

With even the best Child Safe Code of Conduct there will be situations where staff need further guidance on activities that may place children in a situation or environment of greater risk. Your Child Safe Policy should provide workers with information on how to respond appropriately to these risks.

It should clearly set down what is concerning or unacceptable behaviour by adults who work with children. It should outline the types of harm and abuse that it aims to prevent. Examples include:

- a sexual offence under the *Crimes Act 1900*
  - 'contact behaviour'
    – sexual intercourse
    – kissing
    – fondling
    – sexual penetration
    – exploiting a child or young person through prostitution
  - 'non-contact behaviour'
    – flirting
    – sexual innuendo
    – inappropriate text messaging
    – inappropriate photography
    – exposure to pornography or nudity

- sexual misconduct
  - descriptions of sexual acts without a legitimate reason to provide the descriptions
  - sexual comments, conversations or communications
  - comments to a child that express a desire to act in a sexual manner towards the child, or another child
- ill-treatment of a child
- neglect of a child
- an assault against a child
- an offence under 43B (failure to protect) or 316A (failure to report) of the *Crimes Act 1900*.

To learn more about types of harm, see the OCG's handbook *Risk Management and the Child Safe Standards – Part 2: Identifying risk.*

Grooming

Grooming is the manipulation of a child and the people caring for the child to enable a perpetrator to be alone with the child with the intent of abusing them.

Adults should be aware of how harm and abuse can occur to children, and know they have a responsibility to report concerning behaviour and breaches of an organisation's Child Safe Code of Conduct. By providing workers with clear guidance on acceptable behaviour when interacting with children, including in high-risk situations, organisations should make grooming of a child easier to identify.

Grooming may appear innocent, which makes it difficult to identify and explicitly define. It includes a range of techniques, many of which are not overtly sexual or directly abusive in themselves. A perpetrator's motivation to sexually abuse or conceal sexual abuse may be the only distinguishable factors. So, when an organisation clearly sets out which behaviours are not acceptable via a Child Safe Code of Conduct, it becomes easier to call out potential grooming behaviour.

Grooming in an organisational setting is often more complex than grooming occurring in other contexts. This is because perpetrators need to be 'able to circumvent protective procedures or exploit system weaknesses to facilitate abuse and avoid exposure'.[4]

Perpetrators not only target potential victims with grooming techniques but also people who might assist them to gain access to a child or who can be manipulated to conceal abuse, including parents, other caregivers and sometimes entire organisations.

To learn more about grooming, see the OCG's handbook *Risk Management and the Child Safe Standards – Part 2: Identifying risk.*

To learn more about reducing risk, see the OCG's resource *Risk Management and the Child Safe Standards – Part 1: Responding to risk.*

Case study

In one organisation, someone noticed a staff member showing a child photographs on their phone. Another staff member noticed the adult hugging the child. A third saw the staff member having a coffee alone with the child in a social setting. All were breaches of the organisation's Child Safe Code of Conduct. All were reported. This allowed the organisation's leaders to realise there was a 'pattern of behaviours', which suggested grooming was taking place.

This is why it's important to report even minor breaches because there may be things that others have seen that you haven't.

Adapted from the Royal Commission into Institutional Responses to Child Sexual Abuse

Legal requirements

When creating your Child Safe Policy, you should reference and use the Child Safe Standards to ensure you are following best practice guidelines. More information on the Standards can be found in the OCG's *Guide to the Child Safe Standards*, available on the OCG website.

You may also want to refer to WWCC legislation, legislation relating to inclusion, and regulations from Fair Work Australia, the *Disability Inclusion Act 2014* and the *Anti-Discrimination Act 1977*. Specific legislation relating to child safety is referenced in the 'Child Safe Policy template' section at the end of this handbook.

Responding to identified risks

A Child Safe Policy fits within the suite of documents an organisation has that attempts to reduce the risk of harm to children and young people. Depending on the size of your organisation, they might all sit within a single Child Safe Policy. Alternatively, you may have separate policies for things such as your reporting obligations and how you intend to recruit and manage staff. You might have a separate plan to manage risk. Some policies may be unique to your organisation. Your Child Safe Policy should reference them all.

The following section provides organisations with examples of situations and places where a higher risk of harm is present. They are considered 'high risk' because they provide opportunities for adults to be alone with children. They may allow adults to build inappropriate relationships with children or engage in misconduct with them. You should think about how each of the situations relates to your organisation and, in your Child Safe Policy, address the ways you can mitigate the risks. If you have a separate Child Safe Risk Management Plan (CSRMP) as a standalone policy, it should be referenced in your Child Safe Policy.

Sexual misconduct

Your Child Safe Policy should identify and describe how you intend to reduce or remove the risks of a child being subjected to sexual misconduct in your organisation, and reference your CSRMP if you have one.

Potential solution to reducing or removing the risk of a child being subjected to sexual misconduct? Have a Child Safe Code of Conduct that clearly defines what is acceptable, and what is unacceptable, behaviour for adults interacting with children and young people.

Not providing children with an ability to raise concerns

Children are safer when organisations recognise and respect their rights and give them a voice. Children can fail to report things that hurt or scare them when:

- there are no systems in place to support reporting
- there are systems in place to support reporting but they are not accessible to children and young people in your organisation
- the perpetrator has groomed the child and discouraged them from reporting
- 'closed' organisations restrict reporting and any response to concerns raised is kept 'in-house' with police and government agencies prevented from investigating or having oversight of any investigations
- families and the greater community are not kept informed of the risk of harm and abuse.[5]

A potential solution to not providing children with an ability to raise concerns? Your Child Safe Policy should describe how you support child-friendly reporting opportunities.

Supervision of children

When an organisation fails to supervise children it can result in them being harmed. Examples of a failure to supervise can include:

- a child being left behind in a day care centre
- a child being left in a vehicle
- inadequate child-to-staff ratio in formal settings, or a failure to risk assess to ensure a suitable number of adults in supervisory roles appropriately corresponds to a location, planned activity or number of children
- allowing a child to access public facilities, such as toilets and change rooms, without adult supervision.

Potential solution to failing to supervise children? Your Child Safe Policy and CSRMP, if you have one, should describe how children are kept safe in these environments.

Managing drop off and pick up

Children are at greater risk in one-on-one situations with adults because there is a lack of supervision from other adults. On occasions, an organisation may have to address the potential for harm where a parent is late picking up their child, particularly where this is a regular occurrence.

Potential solution to managing drop off and pick up where children could potentially be left one-on-one with adults? Your Child Safe Policy should set out the responsibility of parents to collect children or make alternative arrangements if they are going to be late. It should also include the appropriate actions a staff member and the organisation should take to ensure the safety and wellbeing of the child in these situations.

Transportation of children

Transportation of children is considered a high-risk matter. Private cases heard by the Royal Commission into Institutional Responses to Child Sexual Abuse revealed the likelihood of abuse increased when travelling, usually when a child was alone with an adult. Another risk in relation to the transportation of children is when a child is left behind on a bus. Sadly, children have died in hot vehicles because of this type of neglect. In some situations, however, it may be inevitable that a child travels alone in a car with an adult who is not their parent or carer.

Potential solution to the transportation of children in high-risk situations? Your Child Safe Policy should describe your organisation's strategies to reduce risk when children are travelling on buses and in private vehicles. It should include protocols, such as children sitting in the back seat if alone with an adult, and a system of checking all children have left a bus at the end of a journey. It should also describe that children should not sit on the lap of an adult.

Online communication*

Online communication poses a risk to children because it provides an adult with the chance to communicate with a child privately. It also allows the adult to share or request content that may not be appropriate.

An additional area of risk arises when staff members are able to connect with children or families through their private messaging accounts. The child or their family may then be able to access information about the staff member's private life that may not be appropriate for them to know about. Additionally, the person may hold views that are not appropriate for children or young people.

Potential solution to reducing risk associated with online communication? Your Child Safe Policy should describe the acceptable ways adults are able to communicate with children online (it may do this by referencing your Child Safe Code of Conduct).

Social media*

Social media platforms are a great way to share information about your organisation. You may consider drafting a separate social media policy to guide staff around what is acceptable to post, including what kinds of photographs are appropriate and what permissions are required before posting.

Organisations often use social media and emails to communicate with parents and children, such as confirming game times, practice sessions and venues. To reduce the risk of an adult interacting inappropriately with children through social media, these communications should be group messages, not private one-on-one chats, and accessible to anyone at your club.

Potential solution to reducing inappropriate behaviour around social media use? Your Child Safe Policy should describe the acceptable ways the members of your organisation are able to use social media (it may do this by referencing your Child Safe Code of Conduct) and explain how to monitor social media posts and comments.

* For detailed information on online risk, visit esafety.gov.au.

Photography and the use of images*

Other than taking, storing and distributing child abuse images, there is no law in NSW that specifically prohibits the taking of photographic images of children in public places. We know organisations use photos of children to celebrate success, demonstrate the services on offer and keep parents and extended family members up-to-date with their child's activities. While this is a great way for families to stay connected, it is important you consider the risks involved in using photographs with children in them.

> **You cannot post an image of a child in statutory care, who is under the supervision of the Minister for Families, Communities and Disability Services, without first obtaining permission from the Minister.**

You should be conscious of how the images you use for publicity or distribution show the child. Are they in clothing, a uniform or a venue that might identify their location? Is the image appropriate for public viewing? Children are often quick to emulate musicians, film and television celebrities, and people they see on social media. While emulating an adult in dress and pose may seem like fun, the resulting images may not be appropriate for, or a good representation of, your organisation. Carefully consider the use of stylised images of children and young people. Is the child in clothing or a pose that some might consider sexually suggestive? Could the child become subject to bullying by other children because of the image? Could an adult access, store or disseminate the image for inappropriate reasons?

You should provide parents and staff members with information around taking, using and storing photographic images on behalf of the organisation.

- Are people allowed to take pictures with their personal phone or camera, or should images only be taken with the club's equipment?
- What should happen to the image once it has been taken?
- Where are images stored and how are they shared?
- How can you ensure the privacy of the child?
- How would you respond to requests to remove an image?
- How do you want your organisation represented?
- How do you obtain permission to take and use images?
-

Potential solution to using photographic images inappropriately? Your Child Safe Policy should describe the acceptable ways the members of your organisation are able to take and use images (it may do this by referencing your Child Safe Code of Conduct). As a starting point you should obtain the permission from children, parents and carers before photos are taken. Developing a permission slip or consent process is one way to manage the risk. It can also be a way to involve children and young people in understanding they have choices in how their images are used. These forms should include ways for people to have images removed if they request it.

Use of personal electronic equipment*

The risk of children being harmed increases when adults are allowed to use personal electronic equipment in the presence of children and young people. Offenders may use their phones to record children for personal gratification. They can also allow children they consider their 'favourites' to play games on their phone or laptop as a grooming technique.

An adult seeking to groom and then harm a child may use personal electronic devices to share and view content with children and young people. In doing so, the offender is seeking to reduce the victim's resistance and inhibition to inappropriate content. An adult grooming a child may also leverage the viewing of inappropriate content to maintain the discretion of a child or young person, reducing their willingness to report the behaviour and the perpetrator. This kind of behaviour also serves to exclude the child from their peers. (Removing peer support makes the child more susceptible to abuse and is considered a grooming technique.)

Potential solution to inappropriate use of personal electronic devices? Your Child Safe Policy should clearly state the circumstances when personal electronic equipment can be used in the presence of children. It may do this by referencing your Child Safe Code of Conduct.

* For detailed information on online risk, including the use of photographic images, visit esafety.gov.au.

Alcohol, drugs, cigarettes, vapes and pornography

Supplying alcohol, drugs, cigarettes, vapes and pornography to a child under the age of 18 is illegal in NSW. Adults who do this may intend to abuse a child.

Historically, many adults who abused children provided them with alcohol or drugs first. They sometimes also supplied pornography to normalise the abuse they intended to inflict on the child. These instances of the child breaking the rules can potentially be used to coerce the child into being more compliant to abuse.

> Potential solution to ensure children and young people are not supplied with illegal substances? Your Child Safe Policy should make clear that supplying drugs, alcohol, cigarettes, vapes or pornography to children and young people is a serious misconduct issue and a disciplinary matter that will be immediately reported to the police.

Inappropriate conversations

Adults who may be intending to abuse children might engage the child in inappropriate conversations, such as exploring sexuality or sexual preferences with them. They may encourage children to discuss personal and intimate topics, or discuss their own sex life or sexual desires. These conversations will not be within any relevant context.

Some adults will have inappropriate conversations with other adults in the organisation in front of children, discussing adult or sexual content. This could be with the intent of 'normalising' this type of discussion. By making it normal and encouraging others to have inappropriate conversations, it will make it less likely other adults will report the inappropriateness of their co-worker.

> Potential solution to preventing inappropriate conversations in your organisation? Your Child Safe Policy should make your organisation's position on inappropriate conversations clear. It can do this by referencing your Code of Conduct and describing how your disciplinary policy will apply.

Gifts and benefits

The Royal Commission into Institutional Responses to Child Sexual Abuse heard how some offenders gave children phones so they could contact them without anyone knowing about it. Sometimes adults provided children with other gifts or benefits with the intention of grooming them.

Giving gifts allows favouritism to occur, which may work to exclude a child from their peers. This removal of peer support can make the child more susceptible to abuse. No adult should be providing gifts to a child they work with without the knowledge of the child's parent or carer and the leadership team at the organisation. No adult should be giving a child gifts or preferential treatment without the consent of other adults, including the child's parent or carer.

Presents to adults from other adults should also be monitored. It could indicate grooming is happening at a parental or organisational level. An offender may be working hard to appear like a nice person to disguise their actual intent. Offering to spend time with the child outside the organisational setting could also be a way of the perpetrator inserting themselves into the child's life and manipulating caring adults into allowing them unsupervised access to the child.

> Potential solution to the inappropriate giving of gifts and benefits? Your Child Safe Policy should clearly state the rules you have on giving gifts and bestowing benefits. It may do this by referencing your Child Safe Code of Conduct and including a gifts and benefits register.

Personal and intimate care

Some children rely on adults to provide them with personal or intimate care. This includes nappy changing, or an adult showering children or young people with disability because they are unable to do this themselves.

This can provide an opportunity for abuse to occur because the area is usually out of sight of other adults. A balance needs to be created between oversight and privacy. Nappy changing may take place in a separate room but does the door need to be closed? Adults providing young people with intimate care may operate on a buddy system to ensure they are not alone with children.

Potential solution to inappropriately handling personal and intimate care? Your Child Safe Policy should provide staff members with clear guidance on what procedures are appropriate when providing personal or intimate care. This should include descriptions of the environments where this care is provided.

Physical contact with children

There are instances where physical contact with children will be required. A child may need assistance with their physical development and the adult who is there supervising the child may need to have contact with the child for the child's own safety. This could include a gym coach 'spotting' a child to ensure they don't hurt themselves when learning a new move, or a swimming teacher supporting a child in the water while they learn to swim. It could be a dance teacher instructing a child on which position they need to be in. It could also happen in physical contact sports like judo or karate.

Risks to children occur when the adult engages in physical contact with the intent of touching the child sexually. This can happen when the adult touches the child on or near intimate areas of their body, sits the child on their lap or hugs the child. Sometimes physical contact starts innocently and then progresses into more sexual touching as the adult normalises the behaviour. This is often seen in adults who are grooming children.

Potential solution to inappropriate physical contact with children? Your Child Safe Policy should provide guidance to adults working with children about what is appropriate touch. It should include adults having to ask the child for permission (if age appropriate) to correct a stance, pose or posture. It should also provide advice on when physical contact is inappropriate, like sitting children on laps or hugging. (If hugging is allowed, which is often the case in early childcare settings, it could describe the kind of hug. Hugs from the side could be preferable to those from the front, for example.)

Asking the child's permission is important for two reasons. Firstly, because the child has the right to decide who can touch them. Secondly, because if the child has been the victim of abuse then touching them without their permission could create additional trauma for them.

Change room etiquette

When children are required to change clothes, whether in a change room, backstage when performing in a show or into a sports uniform in an open field surrounded by spectators, it increases the risk of abuse because the child is in a state of undress and a perpetrator may take an opportunity to exploit them.

Potential solution to poor change room etiquette? Your Child Safe Policy should describe what protocols exist around keeping children safe in these situations. This includes whether adults are allowed to be present in changing areas (which might be necessary where there are very young children), or other protective strategies that need to be in place. It may do this by referencing your Child Safe Code of Conduct.

Secondary employment

Some adults who intend to harm children may use their day job to seek access to the children they work with after hours. The Royal Commission into Institutional Responses to Child Sexual Abuse heard about one man who sought work babysitting children he worked with at a childcare centre. This gave him more opportunity to groom them because he could exploit his relationship with them when he was alone with them in the family home. In sporting environments, evidence was given of coaches who provided additional one-on-one training or who offered private remedial therapy with the intention of being alone with the child.

Potential solution to ensuring secondary employment is appropriate? Your Child Safe Policy should state whether it allows this kind of secondary employment and, if so, what controls it places on it. You might want to keep a register so you can establish a pattern of behaviour if a staff member consistently seeks this kind of work.

Out-of-hours contact

As with secondary employment, abusers may seek to exploit a relationship they've formed with a child in an organisation by continuing it after hours. They may attend a child's award ceremonies, sports events, dance recitals or birthday parties. In these situations their intention may be to find access to the child alone. They may be grooming the child (or their parents) to abuse the child.

Potential solution to ensuring appropriate out-of-hours contact? Your Child Safe Policy should clearly state what is, and what isn't, acceptable when your staff and volunteers have contact with children and young people in your organisation outside of their work hours. In some circumstances it will be inevitable (some children may be relatives of your staff, or their parents may be friends), but in other situations you may want to keep a record of, or restrict, the contact between your staff and children in non-professional settings.

Overnight accommodation

Camps, boarding houses and other forms of overnight accommodation for children outside the home are considered high risk in terms of harm and abuse.

Potential solution to ensuring camps, boarding houses and other forms of overnight accommodation are managed appropriately? Your Child Safe Policy should describe all the protocols you have in place to ensure children are kept safe in these environments. Where is it acceptable for adults to be in the company of children? How are opportunities for adults to be alone with children minimised? What codes of conduct exist to specifically address these situations? What reporting mechanisms and details around reporting obligations exist (including your organisation's responsibility to inform the Office of the Children Guardian's Reportable Conduct Directorate if abuse occurs)? How are families encouraged to support their children while out of home? What are all the other ways you intend to prevent harm from occurring? Or if it does occur during overnight stays, are the guidelines clear for how it should be reported?

Illness and injury management

Sometimes illness and injury can be used by those seeking to harm children as a way to be alone with them or touch them in inappropriate ways. This can occur, for example, when a child is taken from a sports field with a muscle injury. The adult may use the opportunity to touch the child inappropriately under the guise of providing injury management. Similarly, a child in sick bay may be left without adult supervision, making it easier for a perpetrator to access the child.

In some instances, for example in sports clubs that place winning over everything else, adults may put pressure on children to train or play while injured, placing the child at greater risk of harm.

When a child is injured, an adult may need to transport them to a hospital or parent or carer. This means they may be alone with the child. Similarly, it may mean the adult left with the rest of the team may have an opportunity to be alone with children without the oversight of another adult.

Potential solution to ensuring illness and injury management is done appropriately? Your Child Safe Policy should address how you intend to manage the child safe implications of these situations should they occur, including information on other adults who can be contacted at these times to ensure children are not placed in vulnerable situations.

Links to other policies

Additionally, your Child Safe Policy should include how you address:

- risk management
- recruitment, including:
  - your commitment to hiring suitable people to work with children
  - your requirement that all child-related roles hold a verified Working with Children Check (WWCC)
  - the process the employee must follow before being considered for a position with your organisation, such as having reference checks, suitable qualifications and psychometric testing if it's used
  - the requirement to comply with child safe policies and codes of conduct
  - what ongoing supervision, support and direction will be provided for adults working with children and young people
- reporting
  - how to report concerns
  - confidentiality and privacy
  - legal obligations to report
- the creation and dissemination of your Child Safe Code of Conduct.

These matters can be included in the body of your Child Safe Policy, but it is more common for them to exist as standalone documents that are referenced in your Child Safe Policy.

The Office of the Children's Guardian has created resources to support your understanding of the Child Safe Standards. Click here to go to our website and download them for free

Case study

Jemima Middleton joined the Prairie Heights Swimming Club intending to compete at an elite level. She had had success at school and had recently increased her training regime. At the club she met William Smith, the coach. Mr Smith was alone with Ms Middleton on many occasions and used these opportunities to touch her inappropriately. Ms Middleton felt if she reported what Mr Smith was doing, it would endanger her chance to compete. In fact, Mr Smith had instilled this fear in her. She eventually told her parents who went to the police. By this time she was too upset to attend training.

The subsequent investigation found that Prairie Heights Swimming Club had little in the way of policies and procedures beyond a requirement for workers to fill out a Working with Children Check (WWCC) form. The club's leaders did not consult the state's peak body and routinely ignored correspondence and advice on child safety from them.

A new club president was installed after Ms Middleton raised her concerns, and policies, procedures and codes of conduct were immediately put in place. All adults underwent child safe training and children were no longer left alone with adults. Ms Middleton has returned to the pool, while Mr Smith went on leave without pay. 'Helping the police with their enquiries' was the last that was heard of him.[6]

Adapted from the Royal Commission into Institutional Responses to Child Sexual Abuse

Image used on this page is commercial photography and not an actual picture of people who have been exposed to, or perpetrated, abuse.

Communicating your Child Safe Policy

Your Child Safe Policy should be public facing. It can be published on your organisation's website. Like your Child Safe Code of Conduct, it can also be physically handed out when new staff or volunteers commence work, when new children or young people begin interacting with your organisation, and at induction sessions.

It should also be shown to prospective employees as it demonstrates your organisation's intention to be child safe. This has the effect of deterring some potential abusers from working with you, in a process known as 'self-selection'.

When deciding how to publish, look at what you are already doing well and build on it. If you have a brilliant newsletter there is no need to immediately ditch it and change to Facebook posts. Similarly, if you have great social media exposure, there's no need to start handing out paper-based material.

Publicising your Child Safe Policy and engaging with all the people who interact with your organisation can also help you find out what should still be built on. It can help you uncover unhealthy attitudes or beliefs that may indicate a poor child safe culture.

Publicity also allows you to promote a solutions-focused mindset rather than just finding criticism.

A mind map can be a great tool to help publicise your Child Safe Policy, like the one on this page for the Child Safe Standards. It can be used to promote the child safety features you want to instil in your organisation.

Who needs to know?

Anyone who accesses your service should be informed about your Child Safe Policy and it should be included in any introductory information sent out to new players or participants.

Staff (including volunteers)

Staff and volunteers must understand your Child Safe Policy. Involving them in the design of the policy is a great way to obtain their interest and commitment, known as 'buy in'. The policy should be discussed in inductions and training. It can be a standing agenda item in staff meetings to promote ongoing conversations about child safety.

Children and young people

Children should know what adults working with them are doing, or need to do, to keep them safe. Where possible children and young people should be involved in the creation of your Child Safe Policy. Communicating your Child Safe Policy to children helps inform them of their rights and how they should be treated. It also empowers them to raise concerns, should they need to. You may also consider creating a child-friendly version of your Child Safe Policy so it is easier for them to understand. You can ask children to design it or, if they're very young, co-design it.

Mind map of the Child Safe Standards

Families, carers and the community

Communicating your Child Safe Policy to families and communities is a first step in promoting child safety as a shared responsibility. Your policy should include your organisation's Statement of Commitment to Child Safety and clearly show that you recognise your responsibilities and obligations. Parents and communities should know what they can expect of you and what to do if they want to raise any concerns.

Your Child Safe Policy should encourage your community to take an active role in child safety, including the reporting of abuse. It is very important to have an easy way for people, especially children and young people, to raise concerns. It is best practice to have a means of reporting in place near to where you advertise your Child Safe Policy, such as a link on your website.

How to know if communications are successful

Some organisations use websites that employ complex systems and sophisticated tools for data analytics, including surveys, interviews and the use of social media tools. These can tell organisations how many people have downloaded their policies or clicked on email links. This information can help them find out if their community is accessing their information in the way they want to. Sometimes, though, the data will only give 'raw numbers' and won't necessarily demonstrate that people understand an organisation's policies and whether they are contributing to improving child safety.

Smaller organisations may operate more simply, such as by counting how many posters they've printed or how many social media views they've had.

Regardless of what data you capture and how, you should try to find ways to measure the success of your communications. This information can be used to help you improve both your messaging and the ways you use to promote it.

Don't underestimate anecdotal or informal ways of obtaining feedback. In fact, casual conversations that mention your Child Safe Policy are great ways to support your policy. You can use casual conversations to test out certain parts of it with different groups. For example, it might be good to ask a family who has a child with disability about the section on inclusion. New people, whether they are children, families or staff, are great for assessing how easy your policy is to understand.

What to do when something goes wrong

Unfortunately, there will be times when something goes wrong. Your Child Safe Policy should promote a reporting culture and describe what should happen if you need to report a suspicion that a child has been harmed. It may do this in detail, or by referencing your organisation's Child Safe Reporting Policy.

The first priority remains the paramountcy principle; that is, concern for the welfare of the child. Once the reporting process is underway, or has been completed, you should review your Child Safe Policy to see if there are any weaknesses that have been exposed by the incident. You may conduct a deep dive into it, called a 'root cause analysis'. You should use it as an opportunity for improvement and consider reviewing other policies, procedures and the systems you have in place. You may need to change the way things are done, provide additional training for staff, or make changes to your procedures to reduce the chances of the incident happening again.

Some matters can be dealt with by speaking with the person to alert them of your concerns and their need to change their behaviour. At other times, the breach of the policy may require disciplinary action.

It's also possible that a number of 'low level' offences have occurred that now require disciplinary action to correct the inappropriate behaviour. Your Child Safe Policy should be clear about how you will respond to these kinds of breaches of your policies or Child Safe Code or Conduct.

For more information on child safe reporting, see the OCG's *Reporting Obligations and Processes* handbook.

Reflective questions:

- Does your Child Safe Policy contain all the elements described in the information above?
- Are there other areas of high risk in your organisation that need to be addressed in your Child Safe Policy or which require a separate policy?
- How are children, young people, families, carers and communities involved in reviewing and evaluating your Child Safe Policy?
- How do you communicate your Child Safe Policy to all your stakeholders:
  - board members
  - people in leadership roles
  - staff members
  - volunteers
  - contractors
  - children and young people
  - families, carers and communities?

Child Safe Policy template

Heading	What to include
Policy title	Child Safe Policy
Purpose	What is the purpose of this policy? It should describe how its intention is to: ■ demonstrate commitment to the safety and welfare of children and young people ■ minimise the risk of abuse, misconduct and misuse of positional power ■ inform all staff and volunteers of their obligations and responsibilities in keeping children safe.
Scope and audience	Who does this policy apply to? This may include: ■ board members ■ people in leadership roles ■ staff members ■ volunteers ■ contractors ■ children and young people ■ families, carers and communities. What does this policy apply to? ■ It should be general enough to apply to all activities that relate to children.
Responsibilities	What are the individual roles and their responsibilities for keeping children safe in the organisation? Who is responsible for various aspects of child safety within the organisation?
Definitions	Include definitions of words that need to be understood by everyone reading this policy. This should include defining abuse, neglect and reporting thresholds.

Heading	What to include
Content	This should list what your Child Safe Policy contains. This may include: ■ Statement of Commitment to Child Safety ■ supervision of children ■ managing drop offs and pick ups ■ transportation of children ■ online communication ■ social media use ■ photography and the use of images ■ alcohol, drugs, cigarettes, vapes and pornography ■ inappropriate conversations ■ gifts and benefits ■ personal and intimate care ■ physical contact with children ■ change room etiquette ■ secondary employment ■ out-of-hours contact/professional boundaries ■ overnight accommodation ■ illness and injury management.

Related documents (if not covered fully in the policy)	■ Code of Conduct
	■ Child Safe Reporting Policy:
	  • tracking minor breaches and recording them in your organisation
	  • external reporting obligations
	■ Child Safe Risk Management Plan (CSRMP)
	■ Child Safe Recruitment Policy
	■ Any other policy that your Child Safe Policy references

Related legislation, regulations and standards	Include legislation relevant to the work undertaken in your organisation. It may include: ■ *Children's Guardian Act 2019* ■ *Child Protection (Working with Children) Act 2012* ■ Child Protection (Working with Children) Regulation 2013 ■ *Children and Young Persons (Care and Protection) Act 1998* ■ *Crimes Act 1900* ■ Children and Young Persons (Care and Protection) Regulation 2012 ■ Children and Young Persons (Care and Protection) (Child Employment) Regulation 2015 ■ *Disability Inclusion Act 2014* ■ *Anti-Discrimination Act 1977* Standards may include: ■ United Nations Convention of the Rights of the Child ■ Child Safe Standards ■ any other standards related to your organisation's area of work.

Heading	What to include
Publication	Describe briefly where you intend to publicise the policy. This may include: - social media - website - noticeboards - newsletters - staff meetings and public meetings - inductions and training.
Review	This section gives a date when the policy should be reviewed (at least annually and after any critical incidents). It should say who is responsible for ensuring the review takes place, as well as what evaluations need to occur to ensure the policy is fit for purpose. It should emphasise that children and young people are to have a say in any review.

Endnotes

1. Royal Commission into Institutional Responses to Child Sexual Abuse (2017) *Final Report: Making institutions child safe*, 6:206, Commonwealth of Australia, accessed 26 May 2022.

2. "While not inevitably more vulnerable to child sexual abuse, we heard that Aboriginal and Torres Strait Islander children, children with disability and children from culturally and linguistically diverse backgrounds were more likely to encounter circumstances that increased their risk of abuse in institutions, reduced their ability to disclose or report abuse and, if they did disclose or report, reduced their chances of receiving an adequate response."
   – Royal Commission into Institutional Responses to Child Sexual Abuse (2017) *Final Report: Making institutions child safe*, 6:3, Commonwealth of Australia, accessed 26 May 2022.

3. "A child safe institution pays attention to equity by taking into account children's diverse circumstances. It recognises that some children are more vulnerable to sexual abuse than others, or find it harder to speak up and be heard, and makes the necessary adjustments to equally protect all children. A child safe institution would tailor standard procedures to ensure these children have fair access to the relationships, skills, knowledge and resources they need to be safe, in equal measure with their peers... All children have access to information, support and complaints processes."
   – Royal Commission into Institutional Responses to Child Sexual Abuse (2017) *Final Report: Making institutions child safe*, 6:421, Commonwealth of Australia, accessed 26 May 2022.

4. P O'Leary, E Koh and A Dare (2017) *Grooming and child sexual abuse in institutional contexts*, 11, Commonwealth of Australia, accessed 1 June 2022.

5. Royal Commission into Institutional Responses to Child Sexual Abuse (2017) *Final Report: Making institutions child safe*, 6:165, Commonwealth of Australia, accessed 26 May 2022.

6. Royal Commission into Institutional Responses to Child Sexual Abuse (2015) *Report of Case Study No. 15*, Commonwealth of Australia, accessed 31 May 2022.