

As a provider of services for schools and communities The Bryan Education Foundation (TBEF) has a critical role in promoting and ensuring the safety and wellbeing of children. TBEF FamilyLinQ initiative is committed to being a Child Safe Organisation and having an organisational culture that values all children and intentionally promotes children's safety and wellbeing.

FamilyLinQ embraces the United Nations Convention on the [Rights of the Child](#) and embeds the [National Principles for Child Safe Organisations](#) to ensure the safety of children and young people and meet its legal and regulatory requirements to the highest standard.

At FamilyLinQ responsibility for children's safety and wellbeing is shared by the Board, all personnel, hub participants and visitors.

1 Overview

1.1 Purpose and scope

- (a) This Child safety and wellbeing policy (Policy) sets out the actions to be undertaken by The Bryan Education Foundation (**TBEF**) and any person undertaking work for TBEF.
- (b) In this Policy, those to who this policy applies are collectively referred to as **personnel**. It is defined at clause 1.5 (d) to include:
 - (i) TBEF's **ongoing and non-ongoing employees**, including its Executive Director
 - (ii) Board Members.
 - (iii) any other person employed or engaged in connection with the FamilyLinQ Initiative.
 - (iv) for the purpose of this Policy, any person contracted to do work for TBEF and to comply with TBEF's policies, and
 - (v) for the purpose of this Policy, any **unpaid personnel** who undertake work for TBEF (e.g., volunteers or student placements).
- (c) TBEF conducts a range of activities related to children, and not all personnel are in direct contact with children. This Policy applies to all personnel regardless of whether or not their current work is child related.
- (d) This Policy sets out personnel's obligations and responsibilities regarding how to act ethically towards children and promote and protect their safety and human rights.
- (e) The actions and responsibilities set out in this Policy are designed to ensure that TBEF is a child safe workplace that implements child safe work practices and promotes the wellbeing of children.

1.2 Work involving children

- (a) A significant amount of our work involves children. This includes:
 - (i) supporting organisations who deliver programs to children.
 - (ii) working with Government to deliver innovative programs for the betterment of children.

- (iii) providing services for young people.
- (iv) events attended by children and young people.

1.3 The National Principles

- (a) The National Principles for Child Safe Organisations were developed by the National Children's Commissioner and implement the key recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse. They provide a nationally consistent approach to creating child safe organisational cultures.

1.4 Structure of this Policy

- (a) Part 2 of this Policy identifies each of the ten [National Principles for Child Safe Organisations](#), and sets out the specific actions that need to be taken to address each principle. It also includes guidance on the processes and procedures necessary to ensure child safety and wellbeing across all areas of our work.
- (b) Part 3 of this Policy is a 'snapshot' of the Policy. It is designed as a reference guide summarising the Policy.
- (c) Appendix A to this Policy sets out the specific responsibilities of personnel.

1.5 Definitions in this Policy

- (a) **Child** means a person below the age of 18 years, as defined in the [Convention on the Rights of the Child](#).
- (b) **Contact with a child** means physical contact, face-to-face contact, written communication, oral communication, or electronic communication. Contact does not include providing information to children on our website or through other means where there is no exchange of information or communication with a child.
- (c) **Child harm** means all forms of physical, emotional or sexual abuse or exploitation, neglect or harm.
- (d) **Personnel is:**
 - (i) TBEF employees, ongoing and non-ongoing, and including the Executive Director and Senior Executive.
 - (ii) TBEF Board Members.
 - (iii) any other person employed or engaged by TBEF in connection with the FamilyLinQ initiative to do work for TBEF.
 - (iv) any person contractually bound to undertake work for TBEF and required to comply with TBEF policies.
 - (v) unpaid TBEF personnel (such as student placements or volunteers) undertaking work for TBEF.

2 Implementing the National Principles

2.1 A commitment to child safety and wellbeing

National Principle 1: Child safety and wellbeing is embedded in organisational leadership, governance and culture.

- (a) TBEF is committed to ensuring the safety, wellbeing and human rights of children. Across our work, we endeavour to create environments where all children can feel, and be, safe and welcomed, and where their participation is valued.
- (b) Our role in protecting and promoting children's rights, including the right to be safe from all forms of harm, places a particular responsibility on us to be child safe and child-friendly in the way that we work.
- (c) At TBEF, we demonstrate this commitment through the following actions:
 - (i) championing children's rights, modelling best practice and ensuring child safety and wellbeing.
 - (ii) Supporting place-based practice through the development and implementation of a Children's Charter and a Family Hubs Practice Framework.
 - (iii) distributing this Policy to all new and existing personnel.
 - (iv) distributing this Policy freely to the public, making it available and accessible to children and their families, including on our website.
 - (v) providing training and reflection regarding how the Policy is to be applied in practice.
 - (vi) providing appropriate induction, training and professional development on children's rights, child safety and wellbeing to all personnel.
 - (vii) requiring all personnel to act in accordance with our [Child safe code of conduct](#), this Policy, and associated procedures and processes.
 - (viii) monitoring and analysing complaints, incidents, breaches and concerns to identify emerging issues and opportunities to improve safety, practice and service delivery.
 - (ix) reviewing this Policy, and associated procedures and processes, at least every 12 months for effectiveness and utility in creating a child safe environment.

2.2 Taking child participation and consent seriously

National Principle 2: Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.

- (a) The right to participate is one of the four guiding principles of the [Convention on the Rights of the Child](#) and it is fundamental to the enjoyment of all other rights in that Convention. Creating an environment where children are included and involved helps children feel, and be, safe.
- (b) Across our work, personnel identify opportunities to seek the views of children and encourage their participation in decision-making.
- (c) At TBEF, we are committed to:
 - (i) examining our activities for opportunities to involve children.

- (ii) providing appropriate advice and training on children's rights.
- (iii) modelling good practice approaches to engaging with children.
- (iv) making our activities, policy processes, complaints system and educational work, accessible and child friendly.
- (v) listening to children if they are talking about or reporting harm or abuse.
- (vi) informing children in an accessible and child-friendly way about their rights, and the purpose, process and outcomes of FamilyLinQ.
- (vii) ensuring that the child, and where required their parents, guardians or carers have consented to a child's participation at FamilyLinQ.
- (viii) giving children opportunities to be involved at all stages of a project or activity where possible, including reviewing an activity or giving feedback on their involvement.

2.2.1 Consent – participation in FamilyLinQ

- (a) Personnel must obtain parental consent for their child/ren's participation in the FamilyLinQ hub upon enrolment.
 - (i) Where appropriate, children will be asked for consent to participate in an activity by signing into FamilyLinQ upon arrival – parental consent must be provided in the enrolment.
 - (ii) Where children attend a hub activity without a parent / carer then parental consent is required for the child to attend the activity.
- (b) Consent for children's participation must be:
 - (i) Informed – parents, guardians or carers, and children (where appropriate) should receive clear and age-appropriate information about the activity they attend.
 - (ii) Current and negotiable – children must know that they can withdraw from an activity at any time.
- (c) If a child does not agree to being involved in an activity, or only agrees to participate in part of an activity, arrangements are made for their withdrawal from the activities not agreed to.
- (d) TBEF's Practice Lead provides advice to personnel on the type of consent required and how it is to be obtained, consistent with obtaining and managing the [Obtaining and managing child and individual consent procedure](#).
- (e) Consent will be obtained from parents, carers or guardian consistent with the [Obtaining and managing child and individual consent procedure](#) prior to any filming, recording and photo taking during their attendance at a FamilyLinQ hub (noting only a FamilyLinQ device is used for any filming, recording and photo taking).
- (f) Consents received are stored electronically. Hard copy documents recording consents are scanned and saved in TBEF's information system, with the original documents being destroyed after confirming the integrity of each soft copy page is legible, complete and free from corruption and named and labelled correctly.
- (g) Consent is not required for children to attend TBEF events that are open to the general public, for example as audience members at public talks.

2.2.2 Consent – Complaints

- (a) A child is able to make a complaint to TBEF or may be the subject of a complaint made by another child or by an adult. Sometimes, adults may make complaints on behalf of a child they care for or are responsible for. Given the wide range of complaints which may be received by TBEF, it is not possible to have a single position setting out when parents, carers or guardians need to be consulted as part of the management of a complaint involving a child.
- (b) Rather, TBEF determines how to manage such complaints on a case-by-case basis, having regard to the following factors in determining who is required to provide consent:
 - (i) whether the child or children involved in the complaint are the complainants, or the subject of the complaint.
 - (ii) whether the complaint is being made on behalf of a child (for example, by their parent, guardian, carer, teacher or community leader).
 - (iii) whether the complaint concerns a child's conduct
 - (iv) the age of the child or children concerned.
 - (v) the nature of the complaint and matters that are alleged.
 - (vi) other circumstances of the child, including any vulnerabilities, if they have a disability (or multiple disabilities), are at risk, or any other factor that may be relevant.
 - (vii) the nature of the relationship between the person making the complaint and the child on behalf of who the complaint is being made.
 - (viii) the relationship between the child and the person who the complaint is about.
 - (ix) any other relevant factors.

2.2.3 Gifts and prizes for children

- (a) Children may be offered a gift or prize to thank them for their contribution to a TBEF activity, and/or as compensation for their time and costs connected with their participation.
- (b) When advertised in advance of the activity, gifts and prizes may also act as an incentive for children to participate. Examples include:
 - (i) prizes for essay or photo competitions, such as cameras or phones
 - (ii) gifts such as stationery, clothing (like t-shirts) or gift vouchers given to children participating in consultations.
- (c) Personnel providing a gift or prize for children:
 - (i) procure the gift or prize in accordance with TBEF's [Procurement policy](#).
 - (ii) only offer the gift or prize as an incentive for participation if the participation itself benefits the child in some way.
 - (iii) provide gifts or prizes in a fair and non-discriminatory manner.
 - (iv) not offer a cash gift or prize.
 - (v) provide age-appropriate gifts or prizes.
 - (vi) make clear that the gift or prize is from the organisation, not from the individual staff member.

- (vii) where possible, inform parents, guardians or carers, and children, about the gift or prize being offered in advance of the activity and gift giving taking place, particularly where the gift or prize is significant.
- (d) Sometimes TBEF may work with other organisations to recruit children to participate in certain activities, for example school or community groups or disability support organisations. These organisations may offer their own incentives to children who chose to participate in a TBEF activity.

2.3 Involving families and communities

National Principle 3: Families and communities are informed and involved in promoting child safety and wellbeing.

- (a) Open and respectful communication with families and communities about TBEF's child safe policies is an important part of ensuring children can participate fully in our activities.
- (b) The consent requests referred to in clause 2.2.1 above include clear and accessible information about FamilyLinQ or the activity for which consent is being obtained. This includes information about:
 - (i) FamilyLinQ or the activity's purpose.
 - (ii) how information about the participating child or family, including the information received by attending FamilyLinQ, will be used.
 - (iii) who to contact if there are any concerns about the use or collection of the information.
- (c) Families and communities can access information about TBEF's approach to child safety and wellbeing, including this Policy, the [Child safe code of conduct](#) and complaints processes.
- (d) Activities involving Aboriginal and Torres Strait Islander children are conducted in accordance with the National Office of Child Safety's publication '[Keeping Our Kids Safe](#)'. That resource outlines how organisations, including TBEF, can ensure culturally safe environments for Aboriginal and Torres Strait Islander children.

2.4 Respecting equity and diversity

National Principle 4: Equity and diversity is upheld and reflected in policy and practice.

- (a) TBEF recognises that children come from diverse backgrounds with diverse needs and circumstances.
- (b) While all children are vulnerable to harm in organisational contexts, some children have specific vulnerabilities due to their age, backgrounds or circumstances.
- (c) Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse backgrounds, children who are unable to live at home, children with a disability, and LGBTIQ+ identifying children are among those groups whose rights and particular needs must be, and are, considered when TBEF involves them in its activities.
- (d) When engaging with children, TBEF takes steps to create culturally safe and inclusive physical, online, and social environments, including by:
 - (i) making all TBEF spaces safe and welcoming for all children.

- (ii) choosing external venues that are culturally safe for children, and accessible for children with disability.
 - (iii) engaging employees and, where appropriate, engaging volunteers and interns, that children feel comfortable with, for example with similar cultural backgrounds or experiences.
 - (iv) conducting activities in an age-appropriate and culturally appropriate way, including in accordance with the [‘Keeping our Kids Safe’](#) resource when the activity involves Aboriginal and or Torres Strait Islander children.
 - (v) making information, support and TBEF’s complaints processes culturally safe, accessible and easy to understand.
 - (vi) providing information in languages other than English.
- (e) Personnel who conduct activities with children are able to access training on how to respond to children with diverse needs or from vulnerable groups, and how to be culturally sensitive and trauma informed.

2.5 Ensuring personnel are suitable and supported

National Principle 5: People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.

- (a) TBEF has a responsibility to make sure that personnel are suitable and supported for any work they undertake that involves children. This includes:
- (i) emphasising child safety and wellbeing when advertising and recruiting for positions involving contact with children.
 - (ii) ensuring that new and existing personnel in positions where contact with children is an inherent requirement of the position meet all qualification, accreditation and blue card requirements.
 - (iii) induction, supervision, support and performance management processes for employees or unpaid personnel in positions that involve contact with children.
 - (iv) agreement to the TBEF [Child safe code of conduct](#) by all personnel in addition to the [Code of ethics and conduct](#).

2.5.1 Recruitment processes

Requirements for Working with Children Checks

- (a) In all states and territories persons in ‘child-related work’ are legally required to undergo a criminal record check, either through the relevant state or territories Working With Children Check scheme, Working With Vulnerable Persons scheme, or by way of a police check.
- (b) As some of TBEF’s activities include child related activities such as education and care services carried out in a place where children are being educated and cared for i.e. at a school, TBEF is considered a ‘child-related’ organisation under the [Working with Children \(Risk Management and Screening\) Act 2000](#) and [Working with Children \(Risk Management and Screening\) Regulation 2020](#).

Working with Children Checks for job applicants

- (c) Prior to advertising any position at TBEF, Managers consult with Human Resources to determine whether contact with children is an inherent requirement of a particular position, and accordingly whether the position requires candidates to have a valid WWCC.
- (d) Human Resources provides advice regarding the process of applying for a WWCC for job applicants when a valid WWCC is an inherent requirement of a job.
- (e) For all positions involving contact with children, advertisements, job descriptions and selection criteria highlight child safety, wellbeing and rights. Making suitability to work with children explicit in these processes not only provides a robust process of assessment, it also discourages unsuitable people from applying for a position.
- (f) In interviews, job applicants are required to:
 - (i) outline their suitability for child-related work.
 - (ii) discuss their motivations to work with children, and their understanding of child safety in organisational settings.
 - (iii) discuss their work history and reasons for leaving previous employment.
- (g) An assessment of a person's suitability for working with children includes the applicant's:
 - (i) understanding of children's needs, including disadvantaged or vulnerable children.
 - (ii) ability to communicate effectively with children from diverse backgrounds and with different needs.
 - (iii) relevant criminal history.
- (h) At least two reference checks must be undertaken with former employers, including questions relating to the applicant's suitability to work with children and whether they breached any organisational policies and procedures in their former workplace.
- (i) Preferred applicants for positions where contact with children is an inherent requirement of the position must provide TBEF with a current WWCC prior to accepting the position. An applicant **must not commence** in a role with TBEF without a valid WWCC.

2.5.2 Third parties

Third parties involved in TBEF activities, including service providers and contractors are required to read and acknowledge the TBEF's [Child safe code of conduct](#) and complete the [Mandatory training](#) and [Child protection training](#).

Service providers and contractors work at FamilyLinQ sites in line with TBEF's [Working with children authority procedure](#) and [guidelines](#). Personnel must be in possession of a current Blue Card or Exemption card before they engage at a FamilyLinQ site.

2.5.3 Supporting new or existing personnel

- (a) TBEF is committed to providing personnel with resources and training to understand their child safety obligations, including through Mandatory Induction training, Child Protection training and ongoing reflective practice and supervision.
- (b) During the induction process, personnel receive a copy of this Policy and [Child safe code of conduct](#), which they are required to sign before undertaking work for TBEF.

- (c) Existing personnel who are in, or move into, positions where contact with children is an inherent requirement of the position must hold a current WWCC. Calls for expressions of interest for such positions include notice that a current WWCC is required. TBEF will pay for any costs associated with applying for a WWCC for existing personnel.

2.6 Child-focused complaint systems

National Principle 6: Processes to respond to complaints and concerns are child focused.

2.6.1 Complaints about child safety

- (a) All complaints about child safety are taken seriously and dealt with promptly, whether they concern TBEF personnel or someone else.
- (b) When conducting activities involving children, personnel inform those involved in the activity (in an accessible and age-appropriate manner) on how they may give feedback or raise concerns about any aspect of their participation.
- (c) Upon enrolment, the [Charter of service](#) is provided to participants outlining how to provide feedback or make a complaint and informs children and/or their parents, guardians or carers, that they may contact TBEF with any questions, concerns they may have. Information about how to provide feedback or make a complaint is displayed within FamilyLinQ in a clear and easy to understand format.
- (d) TBEF's complaints Charter of service sets out the procedure when a person, including a child, wants to raise concerns about TBEF's complaint handling service. This is available on FamilyLinQ website at: <https://familyling.org.au/>
- (e) All complaints are to be analysed on a regular basis to identify emerging issues or trends and to ensure that TBEF is delivering safe, high-quality services.

2.6.2 Codes of Conduct

- (a) All personnel must acknowledge and comply with the [Child safe code of conduct](#) on commencement with TBEF.
- (b) Complaints regarding breaches of the Child safe code of conduct can be made to the Executive Director who will initiate investigations.
- (c) Most breaches of the Child safe code of conduct will also be breaches of the [Code of ethics and conduct](#). All personnel must comply with the Code of ethics and conduct, which requires an employee, among other things, to treat everyone with respect and courtesy, without harassment, and in compliance with all applicable Australian laws. In instances where a reportable allegation has been made, the matter will be managed in accordance with TBEF's Child Protection Reporting Procedure if the allegation concerns a person who is not a TBEF employee, or Allegations Against Employees in the Area of Child Protection Procedure where the person is a TBEF employee and may be subject to referral to the Queensland Police
- (d) The Executive Director manages and responds to complaints regarding Child safe code of conduct and the TBEF Code of ethics and conduct breaches. Sanctions may be imposed on employees who are found to have breached the Child safe code of conduct or the TBEF Code of ethics and conduct including termination of employment.
- (e) Allegations of criminal conduct will be referred to the police.

- (f) Service providers and unpaid personnel are not subject to disciplinary action under the Child safe code of conduct or the TBEF Code of ethics and conduct, however, any action considered to breach the Child safe code of conduct or the TBEF Code of ethics and conduct may result in the contract or unpaid activity being terminated and referral to the Child Safety Department and Police.
- (g) Information about the Child safe code of conduct and the TBEF Code of ethics and conduct and contact details for making complaints are published on FamilyLinQ's website <https://familylinq.org.au/> .

2.6.3 Responding to disclosure, allegation or suspicion of child abuse or harm

- (a) All personnel including service providers and volunteers receive training on how to document and respond to any disclosures or allegations of child abuse or harm and must follow the [Child protection reporting procedure](#).
- (b) Understanding reporting obligations is important for all staff when dealing with children.
- (c) If personnel become aware of an incident or allegation of abuse or harm of a child, the first priority is to ensure the child's safety, and to mitigate the risks of further harm.
- (d) Personnel are trained to be acutely aware of responding to a child's disclosure or allegation respectfully and appropriately, having regard to the child's maturity and particular vulnerabilities. To the extent possible in the circumstances, personnel respond by:
 - (i) **Listening** – moving to a suitable environment, where possible, being calm and patient, letting the child use their own words and avoiding quizzing them about details.
 - (ii) **Reassuring** – letting them know it is ok that they are talking about their trauma, addressing any concerns they have about child safety, and reassuring them that they are not at fault.
 - (iii) **Respecting** – acknowledging the child's bravery and strength, avoiding making promises that cannot be kept, explaining that, for them to be safe, and letting them know that their experience will need to be reported in accordance with TBEF's policies, including who their experience will be reported to.
- (e) Further guidance on how to respond to a child who discloses child abuse is available from the [Australian Institute of Family Studies, 'Responding to children and young people's disclosures of abuse'](#).

2.6.4 Reporting procedure following disclosure, allegation or suspicion of child abuse or harm

- (a) TBEF personnel who receives a disclosure or allegation of a child being abused or harmed during or in the course of their work at TBEF will follow the [Child protection reporting procedure](#)

2.7 Employee knowledge, skills and awareness

National Principle 7: Employees and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.

- (a) All personnel are required to familiarise themselves with this Policy, the [Child and youth risk management strategy](#), the [Child protection reporting procedure](#), and sign TBEF's [Child safe code of conduct](#) and TBEF's [Code of ethics and conduct](#) on commencement at TBEF.
- (b) The Child safe code of conduct outlines a standard of behaviour and responsibility that is required of all personnel in their contact with children during their work at TBEF, whether or not contact with children is a usual part of their work duties.
- (c) Personnel undertake training on this Policy and their obligations under the Child safe code of conduct. Personnel are required to complete Child Protection training and mandatory training on an annual basis.
- (d) Personnel working with children are also required to be trained in dealing with trauma to ensure that they can respond to children in a trauma-informed manner.
- (e) This includes training regarding:
 - (i) the types of child harm which may be disclosed.
 - (ii) how a child might disclose harm.
 - (iii) the impacts of harm on children, including trauma.
 - (iv) how to respond to children who disclose harm during activities with TBEF, including how to support them where necessary.
 - (v) how to end a session sensitively when a child is trauma impacted.
 - (vi) our reporting obligations.
 - (vii) responding to complaints of employee misconduct.
- (f) Other training and resources available to personnel include TBEF's Privacy Policy, the Code of ethics and conduct, and procedures and information on risk assessment, recordkeeping and creating culturally safe environments.
- (g) Information, support and advice on various aspects of this Policy are also available from relevant sections of TBEF, including the Practice Lead and the Program Management Office.

2.8 Safe physical and online environments

National Principle 8: Physical and **online** environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.

- (a) For each project involving children, Managers and their teams complete a child safety risk assessment, which addresses both physical and online risks and how to mitigate them. Each project evaluation includes an assessment of the implementation and effectiveness of child safety risk mitigation measures in response to each identified risk.

2.8.1 Physical environment

- (a) TBEF has a [Workplace health and safety policy](#), which aims to ensure TBEF is a safe work environment, including for children.
- (b) When a TBEF activity involves face-to-face contact with a child, whether at TBEF offices or off-site, personnel ensure that one or more additional adults (such as parents, guardians, carers, teachers, community leaders, or personnel) are present during the activity, and children are never left unsupervised.
- (c) Usually at least two adults will be in a room with a child, however, if TBEF personnel are incidentally, or required to be, alone with a child, the meeting or activity will take place within the view of other adults, for example in a room with windows, with doors open or in open areas. Personnel will also inform their supervisor that they had conducted an activity alone with a child.
- (d) When an activity with children takes place at the premises of other organisations that work with children, for example at a school, community centre or youth service, that organisation's health and safety measures are reviewed and complied with.
- (e) Personnel do not initiate physical contact with children, nor encourage physical contact when it is initiated by a child. Where a child initiates physical contact, and for the child's benefit it is appropriate to reciprocate, appropriate social etiquette is followed by personnel. Personnel are required to notify their Manager of the physical contact, setting out the circumstances in which the physical contact occurred.
- (f) All children under school age must be accompanied at all times in FamilyLinQ spaces by parents / caregivers. Parents/ caregivers must supervise their child/ren in FamilyLinQ's collaboration and outdoor play spaces and accompany them to appointments.
- (g) To ensure student safety FamilyLinQ will maintain a register of students who need to leave classes to attend appointments at FamilyLinQ during school hours and provide this to school reception prior to 9 am on each school day, or such other administrative process as best integrates with the school's existing procedures. Student information will be limited to the child's name, appointment time and expected return.
- (h) Parents will be required to collect and sign their child in and out from the school reception space when attending appointments during school hours. When scheduling appointments during school hours, all service provider personnel must endeavour to minimise disruptions to children's learning as best as practicable.
- (i) FamilyLinQ facilities may be used by students and DoE employees for school / class purposes during school hours by arrangement with hub staff, noting the need to balance uses of the site with parents, younger siblings and other family members.

2.8.2 Online environment

- (a) TBEF conducts online activities with children, including access to supervised wifi internet, surveys and competitions. Online activities involving children ensure that:
- (i) one or more adults are always present and have consented to the online activity.
 - (ii) any online staff activity is conducted through a TBEF device and using official TBEF email addresses or numbers (i.e., not using personal devices or email addresses).
 - (iii) information exchanged between TBEF personnel, and a child may be reviewed by another TBEF personnel.
 - (iv) a child's right to privacy is protected in accordance with TBEF's [Privacy policy](#).
 - (v) informed consent for TBEF to gather and use personal and sensitive information has been gained from children and/or their parents, guardians or carers.
 - (vi) personnel are trained regarding how to respond to disclosures of abuse or risk of harm to the child or other children that may arise during the online activity.
 - (vii) personnel do not store photos or videos of children involved in TBEF work on personal devices or send them to other people not involved in TBEF activity.
 - (viii) online social media content that is to be made public is moderated by a TBEF employee to exclude potentially harmful contributions.
 - (ix) information for children about an activity they are participating in sets out expectations of online behaviour, the application of safety measures such as moderation by employee members, and communication protocols.
 - (x) activities are consistent with TBEF's [Use of social medial policy](#).
- (b) In some instances, online sessions are recorded, either as an audio recording, or as an audio and visual recording. When this will occur, the information and consent requests provided to participants and/or their parents, guardians or carers, detail the reasons why the recording is taking place, how the recording will be used and stored, and whether or not they consent to the recording.

2.8.3 Protecting children's privacy

- (a) TBEF complies with its obligations under the [Privacy Act 1988 \(Cth\)](#) and the Australian Privacy Principles (APPs) when handling information from and about children. Obligations concern the collection, storage and use of personal and sensitive information.
- (b) Protecting children's right to privacy includes making sure:
- (i) parents, guardians or carers of children, and where appropriate, children, have consented to the collection and use of the child's personal or sensitive information.
 - (ii) information is not used for any purpose other than that for which consent has been provided.
 - (iii) personal and sensitive information including images (photos, videos and artwork) of children are not made public or passed to third parties without the parent's, guardian's or carer's consent, and where appropriate, the child, unless TBEF is reporting suspected or actual child harm to the relevant authorities or is otherwise required by law to disclose the information.

- (iv) even when consent has been provided, having regard to all circumstances, personal information is not publicly distributed if it is not in the best interests of the child. For example, personnel may consider that publishing images of a child with particular vulnerabilities is harmful to the child, or publication may not be permitted for certain children under child protection laws.
- (v) all information about children is de-identified prior to being made public, whether online or in written publications, unless the parent, guardian or carer, or child (where appropriate) has consented to being identified in that publication. De-identification may include deleting or changing names, locations, organisations that the child attends, and any other characteristics of the child that are unique and that, on their own or in combination with other information, could reasonably be expected to identify a child.
- (vi) details about a child who participates in an activity, including consent, is recorded for future reference unless the nature of the activity makes it unviable or inappropriate to do so, for example an anonymous survey. This does not impact any legal or reporting obligations.
- (vii) any personal or sensitive information about children is stored securely. Hard copy and electronic consent request responses are stored electronically together with any information collected unless it is unviable or inappropriate to do so.

2.9 Review of this Policy

National Principle 9: Implementation of the **national** child safe principles is regularly reviewed and improved.

- (a) TBEF reviews this Policy annually to ensure its effectiveness and utility in creating a child safe environment. This review includes:
 - (i) an assessment of whether TBEF is implementing the National Principles for Child Safe Organisations adequately.
 - (ii) an analysis of complaints, concerns and safety incidents involving children to identify causes and systemic failures.
 - (iii) monitoring and evaluations of TBEF activities involving children, including the feedback from children and families where appropriate.
- (b) The review may also include employee surveys, to assess their knowledge of this Policy, the [Child safe code of conduct](#) and associated procedures.
- (c) The reviews will be conducted by TBEF's Practice Lead in conjunction with the FamilyLinQ Manager, Chief Operations Officer and other personnel who have worked with children over the review period.
- (d) Periodically, TBEF's internal auditors will conduct a review of this Policy.
- (e) In addition, related internal policies, procedures and guidance are reviewed and updated at this time, taking into account law and policy changes.

2.10 Documenting policies and procedures

National Principle 10: Policies and procedures document how the organisation is safe for children and young people.

- (a) This Policy is publicly accessible on the FamilyLinQ website <https://familylinq.org.au/>.
- (b) Related TBEF policies and procedures designed to assist personnel to meet their obligations under this Policy include:
- (i) [Allegations against employees in the area of child protection procedure](#)
 - (ii) [Child protection reporting procedure](#)
 - (iii) [Child safety and wellbeing policy](#)
 - (iv) [Code of ethics and conduct policy](#)
 - (v) [Complaints management policy](#)
 - (vi) [Criminal history check procedure](#)
 - (vii) [Enterprise risk management policy](#)
 - (viii) [Enterprise risk management procedure](#)
 - (ix) [eSafety policy](#)
 - (x) [Event safety policy and procedure](#)
 - (xi) [Induction policy](#)
 - (xii) [Management and completion of the mandatory all-staff training program procedure](#)
 - (xiii) [NDIS provider access to FamilyLinQ sites policy and procedure](#)
 - (xiv) [Obtaining and managing child and individual consent procedure](#)
 - (xv) [Privacy policy](#)
 - (xvi) [Recruitment and selection policy](#)
 - (xvii) [Supervision of children policy and procedure](#)
 - (xviii) [Supporting students with asthma and/or anaphylaxis procedure](#)
 - (xix) [Translator and interpreter services policy](#)
 - (xx) [Working with children authority procedure](#)
- (c) The following documents may also provide relevant information or additional assistance for personnel:
- (i) [Allegations against employees child protection guidelines](#)
 - (ii) [Charter of service](#)
 - (iii) [Child and youth risk management strategy](#)
 - (iv) [Child safe code of conduct](#)
 - (v) [Code of ethics and conduct](#)
 - (vi) [Enterprise risk management framework](#)
 - (vii) [Mandatory all-staff training program key messages guide](#)
 - (viii) [Working with children authority guidelines](#)

These policies and procedures may be available to the public upon request.

- (d) The National Office of Child Safety, together with the Secretariat of National Aboriginal and Islander Child Care, has also released a publication titled ['Keeping Our Kids Safe'](#).
- (e) Further information from the Australian Institute of Family Studies includes:

- (i) State and territory working with children checks and police checks:
aifs.gov.au/cfca/publications/pre-employment-screening-working-children-checks-and-police-checks/part-overview
- (ii) Reporting child abuse and neglect: aifs.gov.au/cfca/publications/reporting-abuse-and-neglect
- (iii) Mandatory reporting of child abuse and neglect:
aifs.gov.au/cfca/publications/mandatory-reporting-child-abuse-and-neglect
- (iv) Responding to children and young people's disclosures of abuse:
aifs.gov.au/cfca/publications/responding-children-and-young-people-s-disclosures-abu

3 Snapshot of Child Safety and Wellbeing Policy

The following snapshot of TBEF's Child Safety and Wellbeing Policy outlines how TBEF implements the ten National Principles for Child Safe Organisations as part of its commitment to making its workplace and work safe for children.

National Principle	TBEF policies and procedures
<p>National Principle 1:</p> <p>Child safety and wellbeing is embedded in organisational leadership, governance and culture</p>	<ul style="list-style-type: none"> • This Policy is distributed to all personnel upon their commencement with TBEF and whenever updated. • All personnel are required to act in accordance with TBEF's Child safe code of conduct, this Policy, the Code of ethics and conduct, and associated procedures and processes. • Children's rights are championed by TBEF. • TBEF's leadership models best practice in ensuring child safety and wellbeing, regularly talks about child safety and wellbeing and analyses complaints, incidents, breaches and concerns. • Personnel receive appropriate induction, training and professional development on children's rights, child safety and wellbeing. • This Policy is available and accessible to children and their families, and to the public, including on our website, • This policy is regularly reviewed.
<p>National Principle 2:</p> <p>Children and young people are informed about their rights, participate in decisions affecting them, and are taken seriously</p>	<ul style="list-style-type: none"> • Good practice is modelled when engaging with children. • Activities are examined for opportunities to involve children at all stages. • Parental consent for children's participation in FamilyLinQ is received, where appropriate, children consent to participating in an activity by signing into FamilyLinQ upon arrival. Where children attend a hub activity without a parent or carer then parental consent is required for the child to attend the activity in line with school procedures. • Child participants and their families or carers receive age-appropriate information about an activity's purpose, process and outcomes. • Personnel receive advice and training on children's rights. • TBEF advocates children's rights and makes information about children's rights readily available. • TBEF's activities, including its policy processes, complaints system and educational work, are accessible and child-friendly. • TBEF offers child appropriate gifts and prizes to children who participate in activities.

National Principle	TBEF policies and procedures
<p>National Principle 3:</p> <p>Families and communities are informed and involved in promoting child safety and wellbeing</p>	<ul style="list-style-type: none"> • There is open and respectful communication with families and communities about TBEF’s child-related activities and child safety policies. • Parents, guardians, carers and children receive clear, accessible and age-appropriate information regarding the complaints process and the activities that a child may participate in, including when seeking consent for the child’s participation in TBEF activities. • Activities are conducted in culturally safe environments for their participants.
<p>National Principle 4:</p> <p>Equity is upheld and diverse needs respected in policy and practice</p>	<ul style="list-style-type: none"> • When conducting activities with children, TBEF ensures the physical, online, and or social environment is culturally safe and inclusive. • Employees are trained how to be culturally sensitive, and trauma informed.
<p>National Principle 5:</p> <p>People working with children and young people are suitable and supported for any work involving children</p>	<ul style="list-style-type: none"> • Recruiting officers assess whether a particular position involves contact with children prior to the advertising and selection process. • Child safety and wellbeing is emphasised when advertising and recruiting for positions that involve contact with children. • Working with Children Checks are required for all positions where contact with children is an inherent requirement prior to commencement. • A minimum of two employment-related referee checks are required for all successful applicants prior to a position being offered. The checks will seek information on the suitability of the applicant to working with children, understand their motivations for working with children and report any breaches of policies and procedures. • All personnel must agree to abide by the Child safe code of conduct, and to undertake training on the National Principles for Child Safety and mandatory internal training. • Third parties (service providers and partner organisations) are required to sign the Child safe code of conduct, complete mandatory training and undertake Working With Children Checks.
<p>National Principle 6:</p> <p>Processes to respond to complaints and concerns are child-focused</p>	<ul style="list-style-type: none"> • Complaints by, on behalf of, or about children are taken seriously and managed promptly. • Personnel are trained to respond to allegations or disclosures of harm or abuse, including by being trauma-informed. • When an incident or allegation of abuse or harm of a child arises, the first priorities are ensuring the child’s safety and mitigating risks of further harm.

National Principle	TBEF policies and procedures
	<ul style="list-style-type: none"> • All disclosures and allegations of abuse or harm of a child are reported to the Partnerships Manager and, where necessary, escalated to the school principal, Practice Lead and Executive Director as soon as possible. • Where appropriate, disclosures and allegations of child abuse or harm are reported to law enforcement, social services and or welfare organisations, noting the penalties under the Queensland Criminal Code • Personnel may access counselling following disclosure of child harm or distressing situation during a TBEF activity. • Complaints of breaches of the Child safe code of conduct are reported to the Executive Director and responded to appropriately. • Breaches of the TBEF Code of ethics and conduct are managed according to TBEF procedures for breaches of that code.
<p>National Principle 7:</p> <p>Employees and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training</p>	<ul style="list-style-type: none"> • All personnel, as part of induction and on an annual basis, sign that they understand and will abide by TBEF’s Child safe code of conduct. • All personnel are trained in this Policy and their obligations under the Child safe code of conduct and the Code of ethics and conduct, including as part of their induction. • Personnel who work with children as part of their position will receive resources and regular training on specific child safety policies and procedures relevant to their work, including this Policy, the Child safe code of conduct, how to respond to children who disclose harm, and how to report child harm and abuse, including complaints of employee misconduct.
<p>National Principle 8:</p> <p>Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed</p>	<ul style="list-style-type: none"> • A child safety risk assessment is undertaken for each activity involving children. • Personnel are trained to respond to allegations or disclosures of harm or abuse, including by being trauma-informed. • Children are always supervised by adults, usually at least two but when only one adult is attending to a child or a group of children, it’s within the view of other adults. • Consent is always obtained for child participation in an activity, with clear information regarding what the activity is about, how the information obtained will be used, and information about the ability to withdraw consent at any time. • Information about a child is deidentified prior to any publication. • Online activities involving children are conducted in a way that protects a child’s right to privacy and are conducted through a TBEF device and using official TBEF email addresses or numbers.

National Principle	TBEF policies and procedures
	<ul style="list-style-type: none"> • Online communication between personnel and children may be reviewed by other personnel. • Personnel do not store children’s personal information on their personal devices.
<p>National Principle 9: Implementation of national child safe principles is regularly reviewed and improved</p>	<ul style="list-style-type: none"> • TBEF reviews this Policy annually to ensure its effectiveness and utility in creating a child safe environment, and compliance with relevant laws. • This Policy is subject to internal audit for compliance purposes. • Any incidents, complaints, breaches or concerns reported to TBEF will be considered in the regular review of all child-related policies.
<p>National Principle 10: Policies and procedures document how the organisation is safe for children and young people</p>	<ul style="list-style-type: none"> • This Policy is publicly accessible on the TBEF website. • Other policies and procedures, and further information, are available to guide personnel in meeting their obligations under this Policy.

4 Responsibilities

Child safety and wellbeing is a shared responsibility for everyone at TBEF. All personnel must comply with the matters set out in this Policy.

Personnel in particular roles hold special responsibilities, as follows:

The Board Chair and Board members:

- making a public commitment to child safety and wellbeing.
- championing a child safe culture.
- modelling and reinforcing attitudes that value children.
- undertaking annual child safe training.
- review the [Child and youth risk management strategy](#) and related policies and procedures on an annual basis.
- review complaints, incidents, breaches and concerns on a quarterly basis to identify emerging issues and trends which may indicate risks to the safety and wellbeing of children and young people.

Executive Director responsibilities are:

- dealing with and investigating reports of misconduct by TBEF personnel and service providers.
- making reports to the relevant authorities of suspected or actual child harm.
- maintaining a register that accurately records the details of any report made to any relevant authority of suspected or actual child harm.
- ensuring this Policy is reviewed at least annually.
- managing complaints made to TBEF concerning human rights breaches or discrimination, including to determine what consent may be required when such complaints involve a child.
- managing and responding to allegations of abuse by an employee as part of the Allegation Assessment Team.
- regularly reviewing practice, service delivery and policies and procedures, as well as complaints, incidents, breaches and concerns, to identify opportunities to maintain and improve the safety of children and young people.

Chief Operations Officer responsibilities are:

- reviewing and auditing of the Child Safety and Wellbeing Policy, monitoring organisational compliance with the Working with Children (Risk Management and Screening) Act 2000 and CYRMS.
- leading internal audits of the WWCC system.
- maintaining the WWCC register and ensuring that all staff possess a current and valid WWCC for the Program Management office.
- managing and responding to allegations of abuse by an employee as part of the Allegation Assessment Team.
- supporting the Executive Director in the regular review of practice, service delivery and policies and procedures, as well as complaints, incidents, breaches and concerns, to identify opportunities to maintain and improve the safety of children and young people.

Manager FamilyLinQ responsibilities are:

- overseeing and managing the FamilyLinQ program including the development and implementation of [Child protection reporting procedure](#).
- managing and responding to allegations of abuse by an employee as part of the Allegation Assessment Team.

- supporting the Executive Director in the regular review of practice, service delivery and policies and procedures, as well as complaints, incidents, breaches and concerns, to identify opportunities to maintain and improve the safety of children and young people.

Practice Lead responsibilities are:

- advising personnel on the types of consent to be obtained for each TBEF activity involving children, and reviewing any consent requests that are to be used.
- advising TBEF and personnel on legal requirements related to child safety, including mandatory and voluntary reporting obligations, privacy issues and consent.
- supporting TBEF personnel to meet the requirements of child safety in their practice.
- providing the Executive Director with a detailed and accurate report of any suspected or actual child harm that is reported to the relevant authorities.
- coordinating reviews of this Policy, including assessing the suitability of policy positions.
- investigating compliance with this Policy, and liaising with TBEF's internal auditors regarding same.
- supporting the Executive Director in the regular review of practice, service delivery and policies and procedures, as well as complaints, incidents, breaches and concerns, to identify opportunities to maintain and improve the safety of children and young people.
- is the delegated Child and Youth Risk Officer (CYRO) for the organisation.

Child and Youth Risk Officer (CYRO) responsibilities are:

- provides services or activities to children and young people to manage risks associated with those services or activities.
- implementing TBEF's [Child and youth risk management strategy \(CYRMS\)](#), which includes identifying and assessing risks to children and young people, implementing appropriate risk management strategies, and ensuring that employees and volunteers understand their obligations to protect the safety and well-being of children and young people.

Partnerships Manager is responsible for:

- maintaining the WWCC register and ensuring that all staff possess a current and valid WWCC for their workplace site.
- supporting TBEF personnel to meet requirements of child safety in their practice.
- reviewing and approving the [Child safe incident report](#).
- contacting the Practice Lead (or the Manager FamilyLinQ in the absence of the Practice Lead) and Principal (or their delegated officer) to consult on the incident.
- making reports to the relevant authorities of suspected or actual child harm.
- ensuring personnel are properly inducted into the organisation, including:
 - receiving a copy of this Policy when they begin to work or undertake activities for TBEF. undertaking a training module concerning this Policy.
 - understanding relevant laws, organisational policies and procedures relating to child safety and wellbeing, this Policy and the [Child safe code of conduct](#).
- providing regular support and training for personnel in undertaking their child safety obligations.
- working with TBEF personnel, directors and managers to ensure that positions that will involve working with children are advertised as requiring a valid WWCC.
- ensuring personnel who will be required to work with children have been recruited strictly in line with the [Recruitment and selection policy](#) including that they meet suitability requirements, have undergone a thorough reference check and possess a valid WWCC before commencing in a role where it is required.
- assisting the Executive Director to deal with and investigate complaints of breaches of the [Code of ethics and conduct](#) and the [Child safe code of conduct](#).

- educating employees about their responsibilities under the Code of ethics and conduct and the Child safe code of conduct.

All personnel including staff, volunteers and service providers are responsible for:

- familiarising themselves with this Policy, the [Child safe code of conduct](#) and policies and procedures in relation to child-related activities of TBEF and complying with all requirements relevant to them and the work they undertake for TBEF.
- possessing and maintaining a valid and current WWCC authority (blue card or exemption).
- informing their manager of any changes to their criminal history or other issues that may impact on their ability to hold a valid blue card (or exemption).
- undertaking any training relating to child safety or this Policy, which they may reasonably be required to undertake, and in accordance with this Policy.
- obtaining appropriate consent from parents, carers or guardians, and child (where appropriate) for child participation in an activity.
- ensuring hard copy consent request responses are scanned and stored electronically, and originals are stored safely at TBEF's offices unless such information cannot be stored due to the nature of the activity, for example an anonymous survey.
- reporting any concerns about a child's safety to the Partnerships Manager (or delegate), in accordance with the [Child protection reporting procedure](#).
- providing an environment that is supportive of children's safety and wellbeing.
- All personnel have a responsibility to act in accordance with the [Code of ethics and conduct](#), [Child safe code of conduct](#) and be aware of and comply with their obligations relating to reporting concerns, allegations and incidents of child abuse, including internal and external reporting.