

Child Safety Procedure				
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Purpose

The purpose of this procedure is to describe how Distinctive Options meets the Victorian Child Safe Standards, creates a child safe organisation that protects the wellbeing of children and responds to child safety incidents. It aims to minimise the risk of abuse, ensure that all cases of suspected abuse and misconduct are handled thoroughly, ensure that staff and supports are safe, and ensure that young people are respected and valued.

Scope

This procedure relates to the Board, CEO, all employees, volunteers, students and independent contractors, and participants of Distinctive Options.

Procedure

This procedure provides detailed information about managing child safety at Distinctive Options, including:

- Identifying Child Abuse
- · Responding to Child Abuse
- Reporting Child Abuse
- Investigating Child Abuse
- Risk Management of Child Abuse
- Meeting the Victorian Child Safe Standards
- Responsibilities



Definitions

Child	A person under the age of 18
Child abuse	All forms of physical and/or emotional ill-treatment, sexual abuse, neglect
	or negligent treatment or commercial or other exploitation, resulting in
	actual or potential harm to the child's health, survival, development or
	dignity in the context of a relationship of responsibility, trust or power
	(World Health Organisation, 2016)
Child protection	Any measure taken to safeguard children from abuse or harm
Cumulative harm	Repeated and ongoing abuse or neglect which can cause as much harm
	as a single traumatic event
Disclosure	Occurs when someone informs a person in authority/leadership or other
	trusted adult that they have been subject to abuse or knows about abuse
	occurring
Grooming	Any act with the aim of befriending, building rapport, and gaining the trust
	of a child for the purpose of subjecting them to abuse
Online grooming	Establishing a relationship with a child or young person online with the
	aim of meeting him/her in person for sexual activity
Multidimensional	Occurs where several types of abuse are experienced at the same time
abuse	
Harm	Any significant detrimental effect on a child's physical, psychological or
	emotional wellbeing
Reasonable	A belief based on reasonable grounds that child abuse has occurred when
grounds for belief	all known considerations or facts relevant are taken into account and
	objectively assessed; formed where a reasonable person believes that a
	child is in need of protection, the child has suffered or is likely to suffer
	significant harm as a result of physical injury, or the parents are unable or
	unwilling to protect the child
Reasonable belief	A belief that a reasonable person in the same position would have formed
	on the same grounds



Identifying Child Abuse

Duty of Care

All adults associated with Distinctive Options have a duty of care to support and protect children from any suspected or identified risk. Duty of care is breached if a person does something that a reasonable person would not do in a particular situation, fails to do something that a reasonable person would do, or acts and fails to act in a way that causes harm to someone else.

Reasonable Belief

A reasonable belief is formed where a reasonable person in the same position would have formed the belief on the same grounds. It does not require proof of abuse or neglect. Examples include:

- A child states that they have been abused or neglected
- A child states that someone they know has been abused or neglected
- Someone who knows the child states that the child has been abused or neglected
- A child shows signs of being abused or neglected, including non-accidental or unexplained injury, persistent neglect, poor care or lack of supervision
- There is known persistent family violence or parental substance misuse, psychiatric illness or intellectual disability that is impacting on the child's safety, stability or development

Types of Child Abuse

Physical abuse	Intentionally causing or threatening to cause physical injury to a child, as well as inadvertently causing injury as a consequence of physical punishment or physically aggressive treatment of a child. Possible physical indicators: bruises, cuts, burns or fractures Possible behavioural indicators: wariness or distrust of adults, keeping arms and legs covered on hot days, fear of specific people or unexplained absences
Sexual abuse	Using power or authority over a child to involve the child in sexual activity or putting the child in the presence of sexual behaviours that are inappropriate to the child's age and development. Sexual abuse may involve a range of sexual activity including exposure to pornography, grooming behaviour, fondling, masturbating in the presence of a child and penetration.
	Possible physical indicators: presence of sexually transmitted infections, pregnancy or vaginal/anal bleeding or discharge
	Possible behavioural indicators: sophisticated or unusual sexual behaviour or knowledge, difficulty sleeping, being withdrawn, difficulty interacting and forming relationships with peers, complaining of headaches or stomach problems, fear of specific people, wariness or distrust of adults, displaying aggressive behaviour



Emotional and psychological abuse	Engaging in inappropriate behaviours, such as rejecting, ignoring, threatening or verbally abusing a child, or allowing others to do so. Emotional and psychological abuse may take the form of name calling, put downs or continual rejection to the extent that it significantly damages the child's physical, social, intellectual or emotional development. This also includes exposure to family violence. Possible physical indicators: delays in emotional, mental or physical development, physical signs of self-harming Possible behavioural indicators: low self-esteem, high anxiety, aggressing or
	demanding behaviour, being withdrawal, passive and/or tearful or self-harming
Neglect	Failing to provide a child with basic necessities of life, including food, clothing, hygiene, shelter, medical attention or supervision to the extent that the child's safety, health and development is at risk.
	Possible physical indicators: frequent hunger, malnutrition, poor hygiene, inappropriate clothing
	Possible behavioural indicators: stealing food, aggressive behaviour, misuse of alcohol or drugs or academic issues
Grooming	Sex offenders typically plan in advance who they will target, how they will get close to the child and how to prevent the child from disclosing the abuse. They may isolate children, target vulnerable communities, create 'special' relationships with children and their families, or spend time with children outside of their job. Perpetrators may groom children or families to form a bond with the child or family. This may take place over days, weeks, months or years. Signs of grooming include purchasing children things of value, paying special attention to a particular child, asking children to keep secrets, showing pornography to or sexualising conversation with children, gradual touching (from appropriate to inappropriate) and the use of threats, bribes or physical violence.



Responding to Child Abuse

Responding to Signs of Child Abuse

Staff must report their reasonable belief of child abuse immediately after forming that belief and on each occasion they become aware of any further reasonable grounds for the belief. Reports made about issues that may seem minor to staff (e.g. a bruise on the child's arm) should be made as per the Incident Reporting and Response Procedure as they can assist Child Protection to establish patterns of abuse or neglect. If another staff member disagrees about making a report and the staff member continues to hold the belief that the child is in need of protection, that person is required to make a report to Child Protection.

Each situation is different but standard actions should be employed, including:

- Make notes record what was observed and then date/sign the entry. Do this on an ongoing basis as required.
- Consult colleagues get support and advice from colleagues and supervisors. Compare notes and brainstorm possible strategies.
- Develop action plans based on procedures
- Talk to other agencies collaborate or engage with the child's school, family support services, Orange Door and the Department of Education.
- Talk to the child do this with respect for the child's need for privacy and confidentiality.
- Talk to the child's family only if you believe it will not put the child in danger.

Responding to a Disclosure

If a child makes a disclosure of abuse or neglect, the adult should stay calm, listen to the child and let the child know that they believe them. The adult should reassure the child that they did the right thing telling an adult and let them know what will happen next. The adult should not make promises that cannot be kept, show anger toward the alleged perpetrator, become overly emotional or push the child into providing details of the abuse.

Following the disclosure, the adult should record observations, follow the protocols listed below and consult with appropriate colleagues or support agencies if necessary. Observations of indicators of abuse should be documented as per the Incident Reporting and Response
Procedure.

Where a Parent, Carer or Guardian Makes a Disclosure about a Staff Member or Volunteer

If a parent, carer or guardian says that their child has been abused whilst in care or raises a concern, staff should reassure the parent that Distinctive Options has processes to ensure all abuse allegations are taken very seriously and that these processes will be undertaken immediately.



The staff member receiving the disclosure should submit an incident report with the parent and take detailed notes about the incident, as per <u>Incident Reporting and Response Procedure</u>. The parent should be informed that information may need to be repeated to management and/or authorities and advised about the next steps. The parent should be provided with contact details for the Executive Manager Support Services (EMSS). As required, the EMSS will complete the reporting process (e.g. Victoria Police, Child Protection, NDIS Commission).

The CEO will launch an investigation, in line with the <u>Reportable Conduct Scheme</u>. The possible risk of harm to children posed by an accused person should be evaluated and managed in respect of the child involved and any other children in the accused member of staff's home, work or community life. Management will act to manage and minimise the stress inherent in the allegations process.

Where an employee or volunteer is the subject of an allegations, they should be informed this by the CEO or EMSS as soon as possible and given an explanation of the likely course of action, unless there is an objection by Child Protection or the Police. Support will be offered to the staff member or volunteer as appropriate, including supervision, counselling and time off from work.



Reporting Child Abuse

Reporting Process

- A family member, guardian, child or staff member develops a reasonable belief that a child is in danger. Observations of concerning indicators, probable non-accidental injuries or disclosures of sexual or physical abuse are documented as per the <u>Incident Reporting and</u> Response Procedure.
- 2. If desired, the person with the reasonable belief speaks with the Coordinator or EMSS about the reasonable belief.
- 3. The person with the reasonable belief and the Coordinator or EMSS will determine whether a report should be made and who the belief should be reported to.
- 4. The Coordinator and EMSS will offer to support the child and their family, the person who made the report, and the accused (where the accused is a staff member or volunteer).
- 5. Where required, an investigation will be conducted by the relevant authority and the outcome decided. Relevant family members, guardians, children or staff members will be notified of the outcome of the investigation.
- 6. Management will assess and review any risk management issues, complete the <u>Child</u> <u>Safety Allegations Register</u> on the Child Safety SharePoint Team Site and update policies and procedures where necessary.

Making a Report to Victoria Police

Victoria Police provide a point of call where a child or young person is at imminent or serious risk. Victoria Police must be informed immediately where a child is deemed to be at imminent or serious risk or where there is an allegation of abuse by any adult associated with the organisation.

Making a Report to Child Protection

Child Protection provides services to children, young people and their families in order to protect children and young people from significant harm within their families. If an adult forms a reasonable belief that a child under the age of 18 is in need of protection they are legally required to make a report to either the Child Protection or the police. Disclosures of sexual or physical abuse or probable non-accidental injuries must always be taken seriously and require immediate disclosures to Child Protection. Staff should consult with the Coordinator and the EMSS before contacting Child Protection.

Confidentiality is provided for any adult who makes a report to Child Protection. Disclosure of the reporter's name or any information likely to lead to their identification will be withheld, unless the reporter chooses to identify themselves to those involved in the report, consents in writing to the identity being disclosed or a court decides it is necessary to identify the reporter.



Making a Report to Orange Door

Orange Door (previously Child FIRST) provide a community-based referral point to connect vulnerable children, young people and their families to services they need to protect and promote their health development. If an adult forms a reasonable belief that the concerns have a low-to-moderate impact on the child and the child's immediate safety is not at risk they should make a referral to Orange Door. Upon receiving the referral, Orange Door will conduct further assessment of the child and their family. Staff should consult with the Coordinator and the EMSS before contacting Orange Door. More information can be found online at https://www.orangedoor.vic.gov.au/service-sector-professionals.

Making a Report to the NDIS Commission

The NDIS commission must be informed of reportable incidents that occur in connection with the provision of supports or services. Reportable incidents include:

- Death a child with a disability
- Serious injury of a child with a disability
- Abuse or neglect of a child with a disability
- Unlawful sexual or physical contact or assault of a child with a disability
- Sexual misconduct committed against or in the presence of a child with a disability, including grooming for sexual activity

Where any reportable incident occurs, the EMSS must be informed immediately. They will:

- 1. Notify the NDIS Commission. EMSS to complete the immediate notification form via the portal within 24 hours of becoming aware of an incident or allegation
- 2. Submit a 5 day form. EMSS to complete the 5 Day form via the portal within five business days of becoming aware of an incident or allegation

Further details of the reporting process are described in the <u>Incident Reporting and Response</u> Procedure

Advising Parents, Carers or Guardians of a Report

Abuse or Neglect in the Child's Home

Where a Child Protection or police report involves abuse or neglect from a child's family, adults associated with the Distinctive Options are not required to seek permission from parents, carers or guardians to make a report or to tell them that they have done so.



Abuse or Neglect Outside the Child's Home

Where a Child Protection or police report involves abuse or neglect from an adult outside the family home or an adult associated with Distinctive Options, the child's parents, carers or guardians should be informed as soon as possible.

Legal Issues Related to Reporting

<u>Failure to Disclose Offence</u>: All adults are required to report to police or child protection a reasonable belief that a sexual offence has been committed against a child under the age of 16 by an adult above the age of 18 (unless they have a reasonable excuse for not doing so). Failure to do so may result in a maximum penalty of 3 years imprisonment.

<u>Failure to Protect Offence</u>: All adults with a position of authority in an organisation that works with children must protect children from any adult associated with the organisation that they feel is a substantial sexual abuse risk to children under the age of 16. Failure to do so may result in a maximum penalty of 5 years imprisonment.

<u>Professional Protection</u>: If a report is made on the basis of reasonable belief, the reporter will not be held legally liable for the eventual outcome of any investigation of the report.

Reportable Conduct Scheme: Distinctive Options is subject to the Reportable Conduct Scheme (the Scheme) as required by the Child Wellbeing and Safety Act 2005. This scheme relates to the safety of children who access Distinctive Options and requires that risks to children are managed. The CEO must be made aware of and report any allegation of reportable conduct made against an employee or volunteer to the Commission for Children and Young People within three business days. The Child Wellbeing and Safety Act 2005 states that the head of an organisation (CEO) is required to make the report to the Commission. Reportable conduct includes sexual offences, sexual misconduct, physical violence, behaviour that causes significant emotional or psychological harm to a child, and significant neglect of a child. Appropriate investigation of allegations will be undertaken and outcomes will be reported to the Commission at the conclusion of the investigation within 30 calendar days. More information about the Reportable Conduct Scheme including reporting processes can be found at https://ccyp.vic.gov.au/reportable-conduct-scheme/.

Staff Responsibilities after Making a Report

After making a report, ongoing responsibilities can include:

- Acting as a support person for the child or young person during interviews
- Attending a case conference
- Participating in case planning meetings
- Continuing to monitor the child's or young person's behaviour in relation to ongoing harm
- Providing written reports for case planning meetings or court proceedings
- Helping families make the changes required to keep children safe



Reporting Process

Who can report?

Anyone! Children, staff, volunteers, etc.

What to report?

Any child safety concerns, including:

- Disclosure of abuse or harm
- Allegation, suspicion or observation
- Breach of Child Safety Code of Conduct

Call 000 if a child is in immediate danger

How?

Incident Report, face to face, letter, email, telephone call, meeting

Who to?

Coordinator, EMSS, CEO

What happens next?

The Coordinator, EMSS or CEO will:

- Offer support to the child, the family, the person who reports and (where relevant) the accused staff member or volunteer
- Initiate internal processes to ensure safety of the child and clarify the complaint
- Decide, in accordance with legal requirements and duty of care, whether the matter should be reported to Victoria Police and/or Child Protection and make a report as soon as possible
- If the incident is a Reportable Incident, notify the NDIS Commission as soon as possible
- Document the incident internally according to the <u>Incident</u> <u>Reporting and Response Procedure</u>

Where a report is made, the Coordinator, EMSS or CEO will, as necessary:

- Conduct an investigation
- Decide on the outcome
- Notify relevant staff, volunteers, parents and children of outcomes
- Review and update risk management plans and documents
- Summarise learnings and make improvements to mitigate risk of re-occurrence



Any queries or concerns about child safety at Distinctive Options should be reported to the Executive Manager Support Services. As at July 2025, this is Rick Dunn.

Email: <u>rick.dunn@d-o.com.au</u>

Phone: 03 9740 7100

Address: 40 Macedon Street, Sunbury VIC 3429

Authority	Number	Role	When to Contact
Orange	Brimbank:	Family services practitioners	Contact Orange Door where
Door	1800 271 046	experienced in assessing the	family dynamics may be
	Bendigo:	needs of vulnerable children	impacting on a child's safety,
	1800 512 359	and their families. Orange	stability or development and
	Sunbury:	Door teams work closely with	referral to support services
	1800 271 151	community-based Child	would be beneficial (e.g.
	Bairnsdale:	Protection workers.	parenting problems, family
	1800 512 358	A referral to Orange Door	conflict, isolation, social or
		may be the best way of	economic disadvantage that
		connecting children, young	impacts on children).
		people and their families to	
		the services they need.	
Child	North Division:	The lead agency responsible	Contact Child Protection where
Protection	1300 598 521	for the care and protection of	there is suspicion on
	South Division:	children and may bring cases	reasonable grounds that a child
	1300 555 526	before the Children's Court	is at risk of significant harm
	After Hours:	and support orders granted	(e.g. serious injury, disclosure
	13 12 78	by the Children's Court.	of abuse, family violence, the
			caregiver is unable or unwilling
			to protect the child).
Victoria	000	Responsible for criminal	Contact Victoria Police in an
Police		investigations into alleged	emergency where there are
		child abuse.	urgent concerns for the child's
			health or life.
Child Wise	1300 381 581	Australia's leading child	Contact Child Wise for child
		protection charity committed	safety information and referrals.
		to the prevention and	
		reduction of sexual abuse	
		and exploitation of children	
		around the world.	



Investigating Child Abuse

Where external authorities have been contacted about a concern, allegation or incidence of child abuse, they may undertake an investigation. All employees must fully cooperate with any internal or external investigation that takes place.

Even when an external investigation is not required, an internal investigation may be conducted. Investigations are completed in accordance with the principles of natural justice and will remain confidential (as far as possible).

While an investigation is in progress, the employee against whom an allegation is made may be stood down until a decision is made about whether an offence has been committed. If the investigation concludes that an offence has been committed, or is likely to have been committed, disciplinary action will be taken proportionate to the severity of the offence.

Where a person is terminated from the organisation due to being found to have completed an offence, the CEO will be responsible for notifying the relevant regulatory bodies.



Risk Management of Child Abuse

When identifying and assessing potential risks, Distinctive Options will:

- Identify risks in both the physical and online environments
- Recognise the different situations and specific activities which may expose children and young people to risk
- Consider circumstances where there is a low level of parental involvement, when there may be a greater likelihood or severity of risks and factors which may expose children to harm
- Include information regarding the child's history of trauma, socio-economic, familial, cultural
 or religious background and how these factors may make some children more risk-exposed
 than others
- When children have a cognitive or physical disability, consider the ways in which their disability may expose them to greater risk of harm



Risks that may occur during support provision include:

Accidental Harm	Poor supervision	High-risk activity
	Poor physical environment	
Physical Abuse	Physical punishment	Punching, shoving, slapping,
	Restrictive practice	pushing, biting, kicking
Psychological/	Threatening language	Intentional ignoring and isolating
Emotional	Bullying	Shaming
Abuse		
Neglect	Lack of supervision	Not meeting the child's specific
	Not providing adequate	physical or cognitive needs
	nourishment	
	Not providing adequate clothing	
	or shelter	
Sexual Abuse	Sexual abuse, assault and	Inappropriate conversations of a
	exploitation	sexual nature
	Grooming	 Crossing professional
	Singling a child out for a	boundaries
	'special' relationship	
	Inappropriate touching	
Cultural/Spiritual	Racial or cultural vilification or	Lack of cultural respect
Abuse	discrimination	 Use of positional power and
	Lack of support to allow a child	control and using
	to be aware of and express their	prayer/scripture as a means of
	cultural identity	manipulation
Online Abuse	Abusive texts and emails	Intimidating others online
	Hurtful messages, images or	
	videos	
Self-Harm,	Self-inflicted physical harm	Scratching, biting, hitting or
Dangerous or	Intentional or unintentional	head banging
Violent		
Behaviour		



Risks that may occur at Distinctive Options include:

No culture of child safety; lack of or safety; lack of or minimal awareness and commitment to child safety Children exposed to risks during supports No culture of child safety policy and procedures CEO, Board, EMSS, Coordinators Light of Child Safety Code of Conduct orisks managed Child Safety Code of Conduct orisks during supports Coordinators Coordinators Coordinators, Staff, Volunteers Road safety rules and licence restrictions followed Social media policy and procedure Record keeping/privacy policy and procedure CEO, Board, EMSS, Coordinators Coordinators Staff, Volunteers CEO, Board, EMSS, Coordinators	Risk	Rating	Strategies	Responsible
minimal awareness and commitment to child safety Children exposed to risks during supports Medium Medium Identified risks managed Coordinators Coordinators Coordinators Coordinators Coordinators Coordinators Staff, Volunteers Staff, Volunteers Record keeping/privacy policy and procedure Record keeping/privacy policy and procedure	No culture of child	Possible	Child safety policy and procedures	CEO, Board,
and commitment to child safety Children exposed to risks during supports Major = Medium Medium Child Safety Code of Conduct Coordinators, Staff, Volunteers restrictions followed Social media policy and procedure Record keeping/privacy policy and procedure	safety; lack of or	x Major =	Child Safety Code of Conduct	EMSS,
child safety Children exposed to risks during supports Major = Medium Medium Child Safety Code of Conduct Coordinators, Staff, Volunteers Staff, Volunteers Staff, Volunteers Social media policy and procedure Record keeping/privacy policy and procedure	minimal awareness	High	Identified risks managed	Coordinators
Children exposed to risks during supports Major = Medium Medium Child Safety Code of Conduct Coordinators, Staff, Volunteers restrictions followed Social media policy and procedure Record keeping/privacy policy and procedure	and commitment to			
risks during supports Major = Medium Road safety rules and licence restrictions followed Staff, Volunteers restrictions followed Social media policy and procedure Record keeping/privacy policy and procedure	child safety			
supports Medium restrictions followed Social media policy and procedure Record keeping/privacy policy and procedure	Children exposed to	Unlikely x	Child Safety Code of Conduct	Coordinators,
Social media policy and procedure Record keeping/privacy policy and procedure procedure	risks during	Major =	Road safety rules and licence	Staff, Volunteers
Record keeping/privacy policy and procedure	supports	Medium	restrictions followed	
procedure			Social media policy and procedure	
			Record keeping/privacy policy and	
• Child safety training for all			procedure	
United Safety training for all			Child safety training for all	
employees			employees	
Recruitment of an Unlikely x • WWCC and NDIS Worker HR Business	Recruitment of an	Unlikely x	WWCC and NDIS Worker	HR Business
inappropriate Major = Screening Partner, EMSS,	inappropriate	Major =	Screening	Partner, EMSS,
person Medium • Robust interviews, reference checks Coordinators	person	Medium	Robust interviews, reference checks	Coordinators
and inductions			and inductions	
Probation periods			Probation periods	
Child Safety Code of Conduct			Child Safety Code of Conduct	
signed			signed	
Inappropriate Unlikely x • Child Safety Code of Conduct CEO, EMSS, HR	Inappropriate	Unlikely x	Child Safety Code of Conduct	CEO, EMSS, HR
behaviour is not Severe = • Clear child safety reporting Business Partner,	behaviour is not	Severe =	Clear child safety reporting	Business Partner,
reported and High procedures Coordinators	reported and	High	procedures	Coordinators
addressed	addressed			
Unquestioning trust Possible • Clear child safety reporting CEO, EMSS,	Unquestioning trust	Possible	Clear child safety reporting	CEO, EMSS,
of long term x Major = procedures Coordinators	of long term	x Major =	procedures	Coordinators
employees or norms High • Child safety training for all	employees or norms	High	Child safety training for all	
employees			employees	



Distinctive Options will manage these risks by:

Risk factor	Analysis	Controls
Activities (situational risk)	Workers often provide 1:1 supports in home and in the community with minimal to no supervision from other adults. Physical contact between workers and children occurs frequently during the delivery of supports. Personal care is provided to some children. Transport is often provided using the workers personal vehicle. These activities make it easier for child abuse or harm to occur or go undetected.	Safety screening Induction by Human Resources Business Partner Child Safety Code of Conduct Child Safety Policy Child Safety Procedure Training in child safety for all employees
Physical environment (situational risk)	The physical environment of support delivery is often in the child's home and in the community. These environments make it easier for child abuse or harm to occur or go undetected. Where a participant under 18 attends group supports and the direct supervising	Safety screening Induction by Human Resources Business Partner Child Safety Code of Conduct Child Safety Policy Child Safety Procedure
staff will have a Working With Children Check, it is acknowledged that other members of the community that may be encountered while delivering supports may not hold this check. This may create risk if the child is not directly supervised. Children are at very minimal risk of being unsupervised in shared spaces with adults that are not from Distinctive Options.	Training in child safety for all employees 1:1 required for group support settings to ensure direct supervision of an employee who holds a Working With Children Check	



Risk factor	Analysis	Controls
Online environment (situational risk)	Most child participants are unable to access the online environment in ways that could provide risk, however this is a potential risk for young people. Clear policies are in place for social media use for workers. The online environment current carries risk that may make it easier for child abuse or harm to occur or to go undetected.	HR Procedure IT Procedure Child Safety Policy Child Safety Procedure
The children (vulnerability risks)	The characteristics of all children accessing supports involve an increased risk of abuse and harm, including physical and intellectual disabilities. Some children carry a history of trauma, abuse or neglect. Some children are living in foster or kinship care. Some children have mental or physical health issues. All of these factors make the children more vulnerable to abuse or harm.	Child Safety Policy Child Safety Procedure
Our people (propensity risk)	Clear procedures are in place to ensure workers are screened for appropriateness to engage with children before providing supports to participants under 18, including reference checks, Working with Children Checks and NDIS Checks. This process is overseen by a single person – the Human Resources Business Partner – who ensures that staff are recruited according to procedures. There are no workers who have a known history of harmful behaviour towards children. A clear child safe code of conduct is in place that is signed by all workers who support children. All workers must declare that they have informed Services Victoria that they are working at Distinctive Options with their WWCC.	Human Resources Business Partner implements screening checks Human Resources Business Partner completes annual child safety training Consistent staff induction processes delivered by the Human Resources Business Partner



Risk factor	Analysis	Controls
Our structures (institutional risk)	Support delivery is provided to a very small percentage of children and young people and is typically not provided on site. This means it is often not seen as a key part of the organisation's business which can increase the risk of child abuse and harm going undetected.	Child Safety Policy Child Safety Procedure Training in child safety for all employees, even where they do not work with children or young people
Our culture (institutional risk)	Policies and resources are in place to help workers understand and identify child abuse and harm. Due to the separation of individual supports where most children and young people are supported, child safety is not seen as a priority for all workers and minimal information is provided following the completion of workers induction. This can decrease the risk that child abuse and harm will be prevented, detected and/or stopped.	Child Safety Policy Child Safety Procedure Training in child safety for all employees, even where they do not work with children or young people
Our policies and procedures (institutional risk)	Policies and resources are in place that are properly implemented and up to date, however they are not communicated to everyone. The HR Procedure describes recruitment practices, the Child Safety Code of Conduct establishes appropriate and inappropriate behaviour towards children with consequences for breaches, and the Child Safety Procedure clearly describes processes for reporting and responding to allegations of child abuse or harm and child safety concerns. Child safety is a topic in all worker inductions however there is minimal to no training and ongoing communication with staff about their role and responsibility to protect children from abuse and harm.	Human Resources Procedure Child Safety Code of Conduct Child Safety Policy Child Safety Procedure Training in child safety for all employees, even where they do not work with children or young people





Meeting the Victorian Child Safe Standards

Distinctive Options meets the Victorian Child Safe Standards. A description of how each standard is met is described below.

Standard 1: Culturally Safe Environments

Distinctive Options is committed to the safety of Indigenous Aboriginal children and children from culturally and linguistically diverse backgrounds. We acknowledge that a child's cultural identity is fundamental to their wellbeing and support the cultural needs of each child. Distinctive Options aims to provide information in a culturally sensitive, relevant and accessible manner. Distinctive Options will not tolerate discriminatory behaviours or practices from staff, students or families. Cultural and spiritual information is collected during the intake process by the Coordinator. This information is provided to staff on Supportability and taken into account when planning supports and choosing staff. Distinctive Options acknowledges the importance of land, culture and identity for children who identify as Aboriginal and Torres Strait Islander. We are dedicated to supporting the many cultures children may bring and educating other people in our community about the importance of Indigenous cultures in Australia. Aboriginal and Torres Strait Islander (ATSI) children will be provided with opportunities to practice self-determination as appropriate to their age and development with support from Indigenous adults and communities. Staff and volunteers must encourage and support children to express their culture and enjoy their cultural rights. Staff and volunteers must actively support and facilitate participation and inclusion within the organisation by Aboriginal and Torres Strait Islander children and their families. Distinctive Options does not tolerate racism and the organisation will respond to any instances of racism.

Standard 2: Leadership, Governance and Culture

Distinctive Options is committed to ensuring governance and leadership that prioritises child safety. Child safety is championed across all organisational levels. Disclosure is encouraged, action is taken and those who disclose are supported. Participation of all interested parties in child safety at Distinctive Options is encouraged. Distinctive Options is committed to the NDS Zero Tolerance initiative. The organisation will never tolerate or normalise abuse, neglect or exploitation. Distinctive Options promotes a culture that upholds the rights, dignity, welfare and safety of all persons with a disability, including children. All employees must sign the Child Safety Code of Conduct that affirms their own commitment to Zero Tolerance.

Standard 3: Child Empowerment

Distinctive Options believes each child should be empowered and taught about their rights. To achieve this, we aim to build their confidence and skills. Children are provided with choices and encouraged to take control over their lives. Staff assist and support children to make decisions about their body and their privacy. Children are provided with opportunities to be involved in planning supports, including choosing staff and activities. Staff must ensure that children are supported to develop, hold and express their personal views, beliefs and preferences.



Staff and coordinators must support children to participate in decisions that affect their lives, including choosing supports, activities and workers. Examples of how this can be achieved include:

- Listening to children
- Supporting children to express their views
- Providing children with information that is relevant and that they can understand
- Taking children's views into account and recording them
- Taking into account children's age, ability to understand and psychological state

Standard 4: Family Engagement

Distinctive Options recognises the important role of families and involves parents and carers when making significant decisions about their child. Parents, families and communities are welcome to provide feedback at any time using their preferred contact method and are encouraged to raise any concerns that they have as per the Feedback and Complaints Policy. We provide information to families and communities about our child safe policies and practices including through sharing information about this Procedure, our Child Safety Code of Conduct and our child safety approach. Distinctive Options involves families and communities by:

- creating an inclusive environment for all families
- ensuring information is easy to understand and accessible
- seeking input on decisions affecting children and young people
- ensuring transparent complaints handling

Standard 5: Diversity and Equity

Distinctive Options values diversity and equity for all children. To achieve this, we:

- Welcome and support participation of all children, including children with disability, children from culturally and linguistically diverse backgrounds, those who are unable to live at home, LGBTIQ children and Aboriginal children and their families
- Offer children and families the opportunity to provide information about themselves through our intake and induction process, including any specific needs for support delivery
- Have zero tolerance of racism and other forms of discrimination and take action when discrimination or exclusion is identified
- Deliver supports that reflect the diversity of children, their interests and cultures
- Strive to reflect the diversity of our communities through representation in our staff and Management team
- Acknowledge and celebrate important cultural dates throughout the service
- Have physical and online environments that actively celebrate diversity
- Commit to ensuring our facilities and online environments promote inclusion of children of all abilities



Distinctive Options understands that many children and families from refugee backgrounds have experienced trauma, dislocation and loss. We are dedicated to supporting children and families with difficult pasts and take the experiences of the family into consideration, however this will not diminish a child's right to be safe or our responsibility to protect children. Culturally and Linguistically Diverse (CALD) children will have their cultural perspectives and beliefs considered at all times, with language diversity accounted for, including the use of interpreters and translators as required.

Distinctive Options acknowledges that children with a disability are at an increased risk of abuse or neglect than the general population. We are dedicated to educating people about the rights of children with disabilities and improving the lives of these children and their families.

Standard 6: Suitable Staff and Volunteers

Distinctive Options employs staff and volunteers who are highly suitable for work with children.

Selection criteria requires applicants to have experience working with children, particularly with children who have a disability. The criteria clearly states the experience, qualifications, qualities and attributes that are expected and outlines the importance of child safety in our organisation.

Advertising is used to find staff to work for Distinctive Options. All advertising involving work with children includes a message about our commitment to child safety, our Child Safety Code of Conduct and our Child Safety Policy. Applicants are informed that they will be subject to rigorous reference and background checks.

All staff employed by Distinctive Options to work with children and young people, including casual staff, volunteers and students are interviewed about their experience with and behaviour towards children. Open-ended questions are used to gain insight into the applicant's values, attitudes and understanding of professional boundaries and accountabilities, particularly involving children.

All staff are screened before beginning work with children. They are informed about screening in the selection criteria, advertising and interviews. All staff who work with children and young people are required to undertake an NDIS Worker Screening Check, a Working with Children Check and referee checks. At least two referees are spoken to in order to establish how long the applicant and referee worked together, the specifics of the position, the applicant's personal strengths and weaknesses and whether the referee would hire the applicant again, particularly in a role that involves working with children who have disabilities and whether they have any concerns about the applicant working with these children.

All new staff and volunteers who work with children receive a copy of the organisation's Child Safety Policy, the Child Safety Procedure and the Child Safety Code of Conduct and be guided through the application of these policies and procedures throughout the staff induction process.



New staff and volunteers are placed on a probation period where they are supported and closely supervised to ensure that they understand their role and that their behaviour towards children is appropriate. Probation periods are typically 6 months long. Following probation periods, ongoing supervision is provided as required.

Standard 7: Child-Focused Complaints Processes

Distinctive Options takes seriously all concerns, complaints and allegations of abuse or suspected abuse against any child or young person in the service. They will be handled sensitively, investigated in a timely manner, and with the safety of the child as the primary consideration. Children who disclose that they are feeling unsafe or being abused must be heard, must be taken seriously and must be treated with sensitivity and compassion. This includes:

- recognising that the safety of children is everyone's responsibility
- having a clear procedure for reporting concerns and allegations
- encouraging children to report if they feel unsafe or concerned
- making people within the organisation aware of their duty of care and legal responsibilities
- appropriately acting on concerns and complaints
- keeping and securely storing accurate records

Standard 8: Child Safety Knowledge, Skills and Awareness

Distinctive Options aims for all staff and volunteers to feel confident and comfortable in discussing any concerns about or allegations of child abuse. Staff and volunteers are educated in the prevention of, identification of and response to child safety risks, including reporting requirements and procedures. Information about child safety, legal obligations and methods for reporting is included as part of the induction process. All employees undergo child safety training with an annual refresher. Staff and volunteers who work with children will be provided with information during induction on issues such as:

- children's rights
- the organisation's child safety and wellbeing policies and procedures
- recognising signs of child abuse or harm
- responding to disclosures
- record keeping
- · risk assessment and management
- external reporting obligations
- creating culturally safe and inclusive environments and responding to racism



Standard 9: Physical and Online Environments

Distinctive Options promotes a culture of online and physical safety for all participants. Appropriate supervision is provided in all settings, including out in the community and in the home. There is a focus on each child's diverse needs and vulnerabilities. Each child has an individual Support Plan that details how the support worker can identify that the child is concerned about something, including non-verbal children. Risk alerts are detailed on Supportability that alert workers to individual risk factors. Where a child receives group supports at Distinctive Options, a 1:1 arrangement is used to ensure direct supervision by an employee who holds a Working With Children Check. Detailed HR and IT Procedures are in place to clearly define how employees are to use social media. The Child Safety Code of Conduct provides guidance on interactions with children both in person and online.

Standard 10: Review of Child Safety Practices

Distinctive Options regularly reviews, evaluates and improves child safe practices. Complaints, concerns and safety incidents are analysed to identify causes and systemic failures to inform continuous improvement. The organisation reports on the findings of relevant reviews to staff and volunteers, community and families and children and young people.

Standard 11: Implementation of Child Safety Practices

Distinctive Options has policies and procedures that support implementation of child safe practices. Distinctive Options ensures that all relevant policies and procedures are clearly stated and readily available to staff and volunteers. These and associated policies and processes are championed by leaders, well understood by those they apply to and implemented effectively.

Policies and procedures are also accessible to and able to be understood by children and young people in a style of communication best suited to their individual needs and preferences including child-friendly, plain language, accessible and translated versions. Distinctive Options will endeavour to involve all stakeholders including children and young people in the development, implementation and review of policies and procedures to the greatest extent possible.



Responsibilities

The governing body has ultimate responsibility for policies and procedures to be in place that are appropriate for the size and type of services provided, and for ensuring that all staff and volunteers abide by these to prevent and respond to child abuse. They must also be aware of their legal liability for failure to disclose abuse or failure to reasonably protect based on known risks.

Management should be aware of all mandatory and voluntary reporting obligations which apply in the jurisdiction in which Distinctive Options operates and ensure that all staff and volunteers are made aware of the obligations that apply to them. Management is also responsible for being aware of and managing any risks to children, and to facilitate internal and/or external reporting by any members of staff/volunteers. Managers and coordinators must:

- Implement this procedure
- Be aware of all reporting obligations and relevant legislation which apply in the jurisdiction in which Distinctive Options operates, and ensure that all staff and volunteers are aware of the obligations that apply to them
- Facilitate internal and/or external reporting by any members of staff or volunteers
- Provide a copy of this Procedure to all staff and volunteers who work with children
- Support staff and volunteers to gain appropriate training, knowledge and skills for the implementation of this Procedure
- Ensure that all adults providing direct support to children on behalf of Distinctive Options have a current Working With Children Check
- Ensure staff and volunteer recruitment and orientation processes are robust and compliant with this procedure and the Child Safe Standards
- Maintain confidentiality at all times
- Read and understand the Child Safe Standards

Staff and volunteers have a responsibility to act in accordance with the Child Safety 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. Staff and volunteers who work with children must:

- Read, understand, sign and act in accordance with this procedure and the Child Safety Code of Conduct
- Provide supports to children in a way that:
 - Encourages children to express themselves and their opinions
 - Maintains children's dignity and rights at all times
 - Has regard to the cultural and family values, age and physical and intellectual development and abilities of each child
- Maintain confidentiality at all times



NGO Training Modules

This procedure must be read in conjunction with the following NGO Training Modules:

Keeping Children and Young People Safe (All DSWs and Coordinators/Key Staff)

Relevant Documents

The following documents are related to this procedure:

Child Safety Policy

Child Safety Code of Conduct

Feedback and Complaints Policy

Incident Reporting and Response Procedure