Child Safety Policy

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NHULUNDU HEALTH SERVICE

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Purpose

At Gladstone Region Aboriginal and Islander Community Controlled Health Service Limited T/A Nhulundu Health Service (GRAICCHS; the Organisation), we are committed to providing an environment that is safe for children and youth and ensuring that this is reflected in all aspects of our operations.

This Child Safety Policy (Policy) sets out the principles and framework that guide the management of child and youth safety at GRAICCHS to ensure GRAICCHS meets its objectives and complies with its legal and regulatory obligations.

Throughout this Policy, we use the terms "youth", "young person", "child" and "children" to refer generally to people under 18 years of age.

Scope

The Policy applies to any person who is engaged in any capacity (whether paid or unpaid) to deliver GRACCHS' services and programs, which involve children or which result in or relate to contact with children, even if that contact is merely incidental (e.g. in the aged care home care setting). This includes our directors, managers, employees, contractors, subcontractors, employees of our contractors and subcontractors, volunteers, interns, work experience students, and any other people who perform work for or on behalf of GRAICCHS.

GRAICCHS has a Child and Youth Risk Management Strategy in place addressing the eight minimum requirements set out in the Working with Children (Risk Management and Screening) Regulation 2011 (Qld) and is reviewed annually.

Role and Responsibilities

This Policy is overseen and championed by the the Board, the Chief Executive Officer (CEO)/ Acting CEO (Licence to Provide Care Service Nominee), Senior Management Team and the Children, Youth and Families Manager. Together, they provide organisational leadership, ensure the Policy is implemented consistently across all programs, and support those who perform work for or on behalf of GRAICCHS to understand and meet their responsibilities.

The Children, Youth and Families Manager, supported by the Senior Management Team and CEO, is responsible for monitoring compliance with the Child Safe Standards and coordinating organisational responses to reportable conduct allegations, reportable conduct investigations and related reporting requirements.

Our staff members must uphold and promote GRAICCHS' values in accordance with this Policy, including by:

- remaining alert and aware of possible safeguarding risks to children;
- guarding children against harmful environments with appropriate actions (for example, adequate supervision or ensuring safe environments);
- taking positive steps to maintain the safety and wellbeing of children engaging with GRAICCHS;
- reporting concerns expeditiously and appropriately, in line with child protection procedures;

- understanding the duty to report specific concerns (and understanding how this interacts with confidentiality obligations);
- challenging any inappropriate or harmful behaviour of any other adult and reporting this;
- acting appropriately in the presence of children;
- not taking any inappropriate risks;
- not smoking, drinking or taking any form of illicit substances in the presence of children;
- ensuring that any children who come into contact with the Organisation or access our services understand their rights and responsibilities, are supported and get any necessary assistance with exercising their rights and responsibilities; and
- communicating with children clearly and respectfully and using language which they can understand and that is appropriate for their age and level of development

Our staff members are responsible for ensuring that they comply with all applicable laws.

National Principles for Child Safe Organisations

GRAICCHS have adopted the National Principles for Child Safe Organisations (see Figure and Table below) as a way to build capacity, promote child wellbeing and embed a child-safe culture within the Organisation. This includes ensuring a culturally safe environment and practices for Aboriginal and Torres Strait Islander children and young people. This Policy has been aligned to these principles.

Child Safe Standards		
1	Leadership and Culture	Child safety and wellbeing is embedded in the entity's organisational leadership, governance and culture.
2	Voice of children	Children are informed about their rights, participate in decisions affecting them and are taken seriously.
3	Family and community	Families and communities are informed and involved in promoting child safety and wellbeing.
4	Equity and diversity	Equity is upheld and diverse needs respected in policy and practice.
5	People	People working with children are suitable and supported to reflect child safety and wellbeing values in practice.
6	Complaints management	Processes to respond to complaints and concerns are child focused.
7	Knowledge and skills	Staff and volunteers of the entity are equipped with the knowledge, skills, and awareness to keep children safe through ongoing education and training.
8	Physical and online environments	Physical and online environments promote safety and wellbeing and minimise the opportunity for children to be harmed.

9	Continuous improvement	Implementation of the Child Safe Standards is regularly reviewed and improved.
10	Policy and procedures	Policies and procedures document how your organisation is safe for children.



Policy Statement

GRAICCHS is firmly committed to the safety, wellbeing, and empowerment of all children.

GRAICCHS has approved a Statement of Commitment (doc_819) to the safety and wellbeing of children and the protection of children from harm, which will be displayed in public areas of GRAICCHS' offices.

Statement of Commitment (doc_819)

- We are committed to the safety of children and young people.
- We are committed to providing an environment which is safe for children and young people, and to ensuring that this is reflected in all aspects of our business operations.
- We value and respect children and young people and welcome them regardless of their abilities, age, sex, gender, or social economic or cultural background.
- Safeguarding children from harm and abuse is an essential responsibility for our Organisation. We are committed to ensuring that any child who comes into contact with our Organisation or services is

properly safeguarded. Every person under this policy must ensure that they play an active role in ensuring that children are properly safeguarded.

- We believe that no child or young person should experience abuse or harm and we are committed to the protection of children and young people. This policy is intended to provide guidance and overarching principles to those who represent us as volunteers or staff, to guide our approach to child protection and safeguarding.
- It is our intention that a child safe culture should be embedded in all levels of our Organisation, including but not limited to our leadership and governance as well as amongst all of our other staff members.
- When dealing with concerns about a child's safety or wellbeing, we are guided by a consideration of what is in the best interests of the child.
- We are committed to:
    - ensuring that our staff members have the knowledge, skills and awareness to keep children safe
    - ensuring that any of our staff members who work with children have the necessary skills, attributes, experience and qualifications to uphold this Policy and provide the support and supervision that children require
    - ensuring that any children who come into contact with our Organisation and who have concerns about their safety or need assistance know where to go and who to talk to
    - ensuring that any children who come into contact with our Organisation and who have concerns about their safety feel comfortable seeking assistance
    - maintaining the safety and security of any of our facilities or environments which may be accessed by children (including any online facilities or environments, websites or platforms)
    - promoting a workplace which values diversity and inclusion
    - where appropriate, involve children and their families in decisions that affect them
    - promoting a culture of child safety at all levels in our Organisation
    - take any allegations or complaints in relation to child safety seriously, and respond promptly and appropriately
    - report any allegations or concerns to relevant authorities whenever appropriate or necessary

Our Commitment to Respect, Equity, Diversity and Cultural Safety

Our leadership has a responsibility to help everyone involved with our Organisation to acknowledge and appreciate the strengths of First Nations culture and to understand its importance to the wellbeing and safety of First Nations children and young people.

- We are committed to providing a culturally safe environment in which the diverse and unique identities and experiences of First Nations children and young people are respected and valued.

- We actively encourage and support children's abilities to express their culture and exercise their cultural rights.
- We have embedded strategies within our organisation that equip all members to acknowledge and appreciate the strengths and importance of First Nations culture to the wellbeing and safety of First Nations children and young people.
- We adopt measures to ensure that racism is identified, confronted, and not tolerated within our organisation. Any instances of racism are addressed with appropriate consequences.
- We exist to support and facilitate the participation and inclusion of First Nations children, young people, and their families within our organisation.
- All of our policies, procedures, systems, and processes work together to create a culturally safe and inclusive environment that meets the needs of First Nations children, young people, and their families.
- Our staff members must encourage and support children to freely express their culture and enjoy their cultural rights.
- Staff members must actively support and facilitate the participation and inclusion of all children and their families within our Organisation.

Respecting Equity and Diversity

We strive to create an environment where children and young people's diverse needs and circumstances are recognised and all children feel safe, welcome and included. We do this by using the following measures:

The organisation is committed to creating an inclusive environment where all children—regardless of their background, identity, ability, or circumstances—feel recognised, respected, and valued. We take proactive steps to ensure children with diverse needs are supported and included in all aspects of our programs and services. This includes:

Inclusive Policies and Practices

Our child safety and inclusion policies reflect a strong commitment to equity and diversity. We actively work to remove barriers to participation and ensure that all children can access our programs in a way that meets their individual needs.

Individualised Support

We take time to understand each child’s unique strengths, interests, needs, and challenges. Where necessary, we develop personalised support or adjustment plans in consultation with families and relevant professionals.

Staff Training and Awareness

All staff receive ongoing training on diversity, inclusion, and supporting children with additional needs. This includes topics such as disability awareness, neurodiversity, cultural sensitivity, and trauma-informed practice.

Culturally Responsive and Respectful Environment

We celebrate and respect the diverse cultural, linguistic, and spiritual backgrounds of the children and families we work with. We actively promote cultural safety and ensure that all children feel their identity is understood and embraced.

Accessible Communication and Spaces

We ensure that our physical spaces, activities, and communication methods are accessible to all children. This may include visual supports, assistive technology, modified activities, or the use of alternative communication tools.

Encouraging Belonging and Participation

Children with diverse needs are encouraged to fully participate in group activities and decision-making. We create opportunities for every child to contribute, connect with peers, and feel a genuine sense of belonging.

Partnership with Families and Specialists

We work closely with families and, where appropriate, external professionals to ensure that each child receives the support they need in a respectful and coordinated manner.

By embracing and supporting diversity, the organisation fosters an environment where every child feels safe, included, and empowered to be themselves.

Child Safe Code of Conduct

We have a Code of Conduct (doc_329) for Working with Children, and we expect all staff members to understand this Code of Conduct and to seek clarification if they need more information or have any questions.

Caring for children and young people brings additional responsibilities for our staff members. All staff members are responsible for promoting and protecting the safety and wellbeing of children and young people by:

- always adhering to the organisation's Child Safe Policy and taking all reasonable steps to ensure the safety and protection of children and young people
- treating everyone including those of different race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes and religious beliefs with respect and honesty and ensure equity is upheld
- being a positive role model to children and young people in all engagement
- setting clear boundaries about appropriate behaviour between yourself and children and young people – boundaries help everyone to understand their roles
- listening and responding appropriately to the views and concerns of children and young people
- being alert to bullying behaviours and responding promptly and appropriately

- ensuring another adult is always present or in sight when conducting one to one consulting, coaching, instruction or other activity
- being alert to children and young people who have been harmed, or may be at risk of harm and reporting this via official channels
- responding quickly, fairly and transparently to any complaints made by a child, young person or their parent/guardian
- encouraging children and young people to 'have a say' on issues that are important to them.

Staff must not:

- engage in rough physical games
- develop any 'special' relationships with children and young people that could be seen as favouritism, such as the offering of gifts or special treatment
- not engage with children or young people outside of the service context
- do things of a personal nature that a child or young person can do for themselves, such as toileting or changing clothes
- discriminate against any child or young person because of age, gender, cultural background, religion, vulnerability or sexuality.
- be inappropriately alone with children or young people or engage in physical contact that is to meet the needs of the adult

Breaches or suspected breaches of the Code of Conduct will be reported as soon as practicable to management either in person or using the contact details at the end of this Policy.

Breaches or suspected breaches of the Code of Conduct will be taken seriously and dealt with quickly, fairly and transparently.

Any staff member who breaches the Code of Conduct will face disciplinary action and depending on severity of the breach, the staff member may have their employment terminated.

Child Safeguarding and Risk Management

Children can be vulnerable to different forms of abuse and harm. It is important to recognise that abuse and harm of children can cover a wide range of circumstances and behaviours. For example, children can be at risk of:

- physical or emotional abuse
- neglect
- sexual abuse
- female genital mutilation (FGM)
- grooming and exploitation

- trafficking and modern slavery
- exposure to or infliction of domestic abuse
- bullying or cyber bullying
- exposure to other inappropriate content or behaviour, such as violence or criminal behaviour
- self-harm
- physical harm when engaging with activities without adequate supervision

The causal factors of any such harm and/or abuse can also be wide-ranging. For example, children can be placed at risk by family members or by members of the community.

All individuals within the scope of this policy must play an active role in always ensuring the safety of children.

GRAICCHS has a Child and Youth Risk Management Strategy in place addressing the eight minimum requirements set out in the Working with Children (Risk Management and Screening) Regulation 2011 (Qld) and is reviewed annually.

Safeguarding Children at GRAICCHS

GRAICCHS is typically based at: 27-29 Goondoon Street, GLADSTONE, QLD, 4680

A health and safety risk assessment has been conducted in relation to the premises and its safety and suitability for children.

The fire safety procedure in relation to the premises can be found in all sections of the premises, kitchen, offices, public access areas, hallways.

A first aid kit is located in the following locations:

- Level 1 kitchen (upstairs)
- Treatment Room (level 2)
- Level 2 Exit (near kitchen)
- Back Meeting Room

If an ambulance is required, call 000 and notify a program manager or service co-ordinator that an ambulance has been called.

Any accident or injury concerning a child should be brought to the attention of the nearest first aider and should, thereafter, be formally reported to the Children, Youth and Families Manager and or Senior Management Team member.

Wherever a child attends our premises alongside their parent or guardian, parents and guardians should ensure that children are properly supervised.

GRAICCHS uses a variety of measures (listed below) to promote safety and wellbeing in physical and online environments while minimising the opportunity for children and young people to be harmed.

Physical Environment Safety

- Supervision and Staffing: All areas where children are present are supervised by appropriately trained staff. Staff-to-child ratios are maintained in line with legal requirements and best practice standards.
- Safe Premises and Equipment: Regular risk assessments are carried out on our premises, equipment, and activities to identify and minimise potential hazards. Safety checks are documented and acted upon promptly.
- Clear Safeguarding Procedures: All staff are trained in safeguarding policies and know how to identify and respond to concerns. There are clear reporting pathways in place for any issues related to child protection or wellbeing.
- Secure Access and Entry: Access to our premises is controlled and monitored. Visitors are required to sign in and are supervised at all times while on site.
- Positive Behaviour Support: We foster a culture of respect, inclusion, and kindness through clear behaviour expectations, positive reinforcement, and age-appropriate conflict resolution strategies.

Online Environment Safety

- Digital Literacy and Education: Children are taught how to use the internet and digital devices safely and responsibly. Age-appropriate lessons cover topics such as online privacy, cyberbullying, and respectful communication.
- Filtered and Monitored Internet Access: Any devices or networks provided by the organisation are filtered to block inappropriate content and monitored to ensure safe use.
- Online Safety Policies: We have clear policies for the use of technology, including guidelines for acceptable online behaviour, social media use, and consequences for misuse.
- Staff Training: Staff receive regular training on online safety, emerging digital risks, and how to support children in navigating the online world safely.
- Parental Engagement: We work in partnership with parents and carers, providing information and resources on how to support online safety at home, including guidance on setting boundaries and recognising warning signs.

Through these combined efforts, the organisation ensures that children are protected and empowered in both their real-world and digital experiences. Child safety is a shared responsibility, and we are committed to maintaining an environment where every child feels secure, valued, and respected

Safeguarding Children at Other Locations

Where any events, activities or trips are to take place at other locations, GRAICCHS will carry out a further risk assessment associated with that event, activity or trip, which must be approved by the Children, Youth and Families Manager and or Senior Management Team member.

Where a certain type of event, activity or trip is taking place, GRAICCHS may issue an additional code of conduct, policy, or other specific requirements which is specific to that occasion. Any such additional documentation will be made available to all those concerned (staff members, parents, guardians etc.) in advance and should be read carefully and adhered to.

Managing the Behaviour of Children

Whenever any adult engaged by GRAICCHS is faced with challenging or inappropriate behaviour from a child or with conflict between children, they must:

- treat each child fairly and equally
- approach the situation in a calm and neutral manner
- only ever use physical restraint/intervention in order to protect the immediate safety of a person, for example to prevent an injury or harm either to the child or others
- wherever it is justified to physically restrain a child or to physically intervene, the amount of force used should be kept to the absolute minimum taking into account the risk posed
- make a written record of the incident and ensure this is reported appropriately to an available Responsible Person

Further details regarding our procedures for managing behaviour can be located in Positive Behaviour Support and Managing High Risk Behaviour Policy (doc_626).

Managing Risks Posed by Other Children

It is important for all adults engaged by GRAICCHS to recognise that children can face harm from their peers. This can commonly take the form of bullying. Bullying can be defined as any behaviour which is repeated and has the intention of hurting somebody either physically or emotionally.

Bullying can sometimes be motivated by prejudices based on certain groups, for example gender, race, religion or sexual orientation. Bullying can often include:

- physical harm perpetrated against another child
- name calling and threats
- cyberbullying (threats and abusive comments made via technology)

Initial Response to Bullying Incidents

Any instance of bullying or concern relating to possible bullying between children at any event or activities arranged by GRAICCHS will usually be dealt with by GRAICCHS, in the first instance, as detailed below. The priority is to ensure the safety and wellbeing of all children involved.

- **Immediate Intervention:** Staff will intervene promptly to stop the bullying behaviour if it is occurring in real-time. They will separate the individuals involved and ensure that everyone is safe.
- **Listening and Fact-Finding** Staff will speak to all children involved—including the victim(s), the child(ren) displaying bullying behaviour, and any witnesses—in a calm, nonjudgemental, and age-appropriate manner to gather facts and understand the context.
- **Recording the Incident** A clear and factual record of the incident will be made as soon as possible, following the organisation's safeguarding and behaviour management procedures.
- **Informing Relevant Parties** Parents or carers of the children involved will be informed about the incident. Depending on the severity, the Children, Youth and Families Manager and or Senior Management Team member Designated Safeguarding Lead (DSL) may also be notified.

- **Initial Support and Action** Support will be offered to the child who has been bullied, and appropriate guidance or consequences will be given to the child displaying bullying behaviour. The response will focus on education, reflection, and behaviour improvement rather than punishment alone.

Response to Persistent Bullying

If bullying continues despite the organisation's initial intervention, further and more serious steps will be taken to address the behaviour and protect the wellbeing of all children involved.

- Escalation of Concern: The matter will be escalated to the Children, Youth and Families Manager and or Senior Management Team member who will review the ongoing situation and the steps already taken.
- Further Investigation: A more in-depth investigation will be carried out, including a review of previous incidents, actions taken, and ongoing behaviours. This may involve input from additional staff, parents/carers, and external professionals if appropriate.
- Individual Support Plans: Tailored support plans will be developed for both the child being bullied and the child engaging in bullying behaviour. This may include one-to-one sessions, behaviour mentoring, or referral to specialist services if needed.
- Stronger Consequences: Where appropriate, the organisation will apply more serious consequences in line with its behaviour or disciplinary policy. This could include temporary exclusion from activities, loss of privileges, or, in extreme cases, suspension or removal from the setting.
- Parent/Carer Involvement: Parents or carers of all children involved will be kept informed and invited to attend meetings to discuss the situation, agree on strategies, and work collaboratively towards resolution.
- Monitoring and Review: The situation will be closely monitored over time. Regular reviews will be carried out to assess the effectiveness of the interventions and ensure that all children feel safe.

All steps in relation to the prevention or management of bullying should be taken in consultation with a Responsible Person.

Photography

Staff Members

On some occasions, we may take photographs featuring children. We recognise that photography of children carries risks, such as:

- the potential for images to be re-used, shared or adapted in a damaging or inappropriate manner
- the general risk of sharing images and the impact this could have on child's public image as they grow older

In view of these risks, we will:

- always ask for written permission from a child and their parent/guardian before taking and sharing any image of them

- always ensure that a child and their parent/guardian are properly informed how an image will be used and shared
- always ensure that a child's identity is protected as far as is possible within any published material
- ask that parents, guardians, children and any other person connected to them who may wish to share any of our published images which features other children to refrain from doing so unless they have the permission of the other children and their parent/guardian

Members of the Public

We do also recognise that members of the public may take photographs when they are attending our premises, events or activities.

We ask that any parents, guardians and other members of the public take the following into consideration when taking photos at our premises, events or activities:

- images of other children should not be shared on social media without the permission of any children who feature in the images (where ascertainable), together with the permission of the children's parent/guardian
- images which are shared on social media should be shared cautiously, with the appropriate privacy and security settings in place.

Staff Recruitment, Suitability and Support

Recruitment

To ensure we engage the most suitable people to work with children and young people we have the following recruitment practices in place:

- **Advertisements** Our commitment to child safety is included in all job advertisements
- **Position Descriptions** Clear position descriptions include our commitment to child safety and wellbeing
- **Interviews:** Face-to-face interviews use behavioural questions to determine the applicant's knowledge of child safeguarding
- **Referee, Qualification and Registration Checks** Confirmation of relevant knowledge and skills as per the position description. At least 2 referee checks, qualification checks and registration checks (if applicable).
- Working with Children Checks In accordance with applicable legislation, we require that any staff member who works with children or young people complete a Queensland's Working with Children Check and hold a valid current Blue Card and Nationally Coordinated Criminal History Check.

As a licensed service for Foster and Kinship Care support, staff recruited to work within all Children, Youth and Families programs will be required to undergo a Child Safety and Personal History Screening (LCS2) application, Any other applicable staff members, all GRAICCHS Management and the Board of Directors are also required to undergo LCS2 screening.

Suitability

We strive to ensure that Staff who are working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice. We do this by using the following measures:

- All new staff must meet the Minimum Qualification Standards and all legislative and contractual obligations
- Children, Youth and Families staff meet the mandatory requirements for the role as identified in the GRAICCHS recruitment policy.
- All staff members, including directors, managers, employees, contractors, volunteers, and students, are required to understand and meet their responsibilities under the updated legal and regulatory framework. The Senior Management Team (SMT) and the Children, Youth and Families Manager will oversee implementation, monitoring, and continuous improvement to ensure every part of the Organisation is child-safe and compliant at all times.
- The Children, Youth & Families Manager will maintain a register for all individuals who are required to hold a LCS2 under the care services licence. The register includes Queensland Working with Children checks (Blue Cards), National Criminal History Checks and LCS2 applications/outcome letters – inclusive of expiry dates.
- All staff are provided with an opportunity to complete Standard of Care/Harm Reporting training.

Staff Knowledge, Skills and Awareness

GRAICCHS maintains a Child Safe Organisation Training and Capability Framework, we have strategies in place to supervise, train and support staff members to understand this Policy, their mandatory reporting obligations, how to build culturally safe environments and their responsibilities to create a child safe and friendly environment.

Our strategies include:

Training

- ensure all Workers read and understand any relevant mandatory information or guidelines as published in their jurisdiction
- complete regular training in relation to child safety
- include child safety as a standing item on meeting agendas

Supervision

- regular supervision sessions that include a focus on child safety and wellbeing

Support:

- an induction process for all new workers including a copy of this Policy document
- regular performance appraisals that discuss child safeguarding

- appointing a child safety officer (Children, Youth and Families Manager) who has an educative role within our organisation.

Confidentiality and Data Protection

All personal information we may process relating to children, shall be processed and stored in accordance with the following documents:

- Privacy Policy & Agreement (doc_276)
- Confidentiality Policy and Agreement (doc_493)
- Filing and Records Management Policy (doc_655)

Reporting

Mandatory Reporters

Staff members who work in the GRAICCHS, Children, Youth and Families programs, doctors, nurses and clinic staff are considered Mandatory Reporters and must follow the mandatory obligations prescribed by the Child Protection Act 1999. Other staff members will report any actual or suspected cases of child abuse immediately to their manager and or supervisor.

In accordance with our obligations in the Queensland Criminal Code, we commit to protect children from sexual offences and will always report sexual offences against children to the Police (where not already reported through the Mandatory Reporter requirements).

Responding to a Child Safety Concern

We aim to provide accessible and responsive complaints management processes that are focused on the needs of children and young people. We do this in the following manner:

All young people and families that use our services are given a lists of key contacts and processes for raising concerns.

Where a child is at immediate risk of serious harm, any adult present should call 000. Thereafter, the Children, Youth and Families Manager and or Senior Management Team member should be contacted as soon as is reasonably practicable.

Where there is a safeguarding concern but no immediate risk of serious harm, the adult who has heard or witnessed this concern should consult with the Children, Youth and Families Manager and or Senior Management Team member as soon as practicable and by no later than the end of that same day.

Where any child makes a disclosure relating to harm or abuse to an adult, it is important for that adult to:

- listen calmly and carefully, showing that their views are taken seriously
- provide an appropriate and honest level of reassurance
- avoid interrogating children and asking probing, intrusive and/or leading questions

- avoid making false promises regarding secrets and confidentiality with the child (because any concern of abuse/harm must be shared with the Children, Youth and Families Manager and or Senior Management Team member and any subsequent safeguarding referral)
- make a confidential written record of the discussion either during the discussion or immediately afterwards. The record should include the key details of the disclosure together with any relevant times, dates, places and people concerned. Audio and video recordings of children making disclosures should be avoided
- refer all relevant information to the Children, Youth and Families Manager and or Senior Management Team member as soon as practicable afterwards, and by no later than the end of the day

Upon receipt of any safeguarding concern, the Children, Youth and Families Manager and or Senior Management Team member shall consult with any other relevant persons and will make any appropriate referrals to the relevant authorities.

Reporting Concerns about Other Adults

Where any person has a concern regarding the conduct of an adult connected to the Organisation, which poses or may pose a safeguarding risk to children such as:

- harming a child either physically or emotionally
- exposing a child to behaviour which may cause physical or emotional harm
- engaging in criminal activity concerning a child

This must be raised in the first instance with the Children, Youth and Families Manager and or Senior Management Team member so that the next appropriate steps may be agreed and actioned. We recognise that there could be circumstances where a person may need to report a matter that has taken place in a setting outside of the person's engagement with the Organisation.

Usually, any appropriate steps following a safeguarding referral in respect of an individual connected to the Organisation will include either:

- further initial enquiries
- escalation to the applicable authority for assessment and/or the police for investigation
- instigation of any appropriate disciplinary, formal investigation processes and suspension of any person concerned within the Organisation
- a referral to any relevant regulatory bodies

Any person within the Organisation who has allegations made against them shall be informed properly in a formal meeting of the particulars of the allegations and the relevant next steps which shall be taken. Such a meeting should ordinarily be held by the Children, Youth and Families Manager and or Senior Management Team member. On certain occasions, such a meeting may not be convened until this has been approved by any authorities involved (such as the police or the relevant local authority).

Any person from within the Organisation who has allegations made against them shall be treated fairly. All enquires, investigations and decisions taken shall be just and fair, with the safety of any child concerned at the heart of the process.

Any person from within the Organisation who makes an allegation against another person from within the Organisation shall be listened to, taken seriously and shall be treated fairly and justly throughout the process of enquiries, investigations and decision making.

Reportable Conduct Scheme

GRAICCHS is committed to complying with the Queensland Reportable Conduct Scheme established under the Child Safe Organisations Act 2024 (Qld). The Reportable Conduct Scheme strengthens child safety by requiring organisations to respond appropriately to allegations of child abuse and misconduct by workers, volunteers, contractors and other people engaged by the organisation.

In accordance with the Reportable Conduct Scheme Policy, all workers, volunteers, contractors and Board members have a responsibility to immediately report any concern, allegation or information that may involve reportable conduct to their manager, the Children, Youth and Families Manager, Chief Executive Officer, or another designated officer.

Reportable conduct may include:

- a child sexual offence
- sexual misconduct involving a child
- ill-treatment of a child
- significant neglect of a child
- physical violence against a child
- behaviour that causes significant emotional or psychological harm to a child.

Where a reportable allegation, reportable conduct or reportable conviction is identified, GRAICCHS will:

- take immediate action to protect the safety and wellbeing of children;
- assess and respond to risks posed to children;
- support children and families affected by the allegation;
- notify relevant authorities where required;
- investigate allegations in a fair, timely and child-focused manner;
- maintain appropriate records and documentation;
- implement corrective actions and improvements following investigations.

Failure by a worker, volunteer or contractor to report concerns relating to reportable conduct may constitute a breach of this policy, the Code of Conduct, the Reportable Conduct Scheme Policy and organisational obligations under child safe legislation. Appropriate disciplinary action may be taken where reporting obligations are not met

Responding to General Complaints or Feedback

Providing opportunities for complaints and feedback ensures that children, young people and their families feel valued and respected and enables GRAICCHS to improve the quality of our service. Children, young people and their families are informed that they can provide feedback or make a complaint when they join our organisation.

Compliments, complaints or feedback can be provided verbally or in writing to any staff member or direct to management either by telephone, email or by post, using the following details:

Telephone: 1800 293 293
Email: info@nhulundu.com.au

More information can be found on www.nhulundu.com.au

GRAICCHS will deal with all complaints and feedback received from children, young people or their families promptly, sensitively and fairly. We will:

- listen to the complaint/feedback
- the person receiving the complaint will make a record of it if received verbally
- advise of the time expected for an outcome

If a staff member receives a complaint, they must forward it to management as soon as possible, this will be also logged in LogiQC.

Management will respond to the complainant with an outcome within the following timeframe: 7 business days

Clearly document and securely store decisions and actions taken in response to complaints and feedback

Make sure that procedural fairness is followed at all times.

If the child, young person or their family is not happy with the outcome from the complaints process they can contact:

Complaints: You can make a complaint about any aspect of the services

- GRAICCHS Feedback: www.nhulundu.com.au or telephone 1800 293 293
- the Department Compliments and complaints | Department of Families, Seniors, Disability Services and Child Safety.
- Queensland Family and Child Commission (QFCC)

Communication

Engaging With Families and Communities

The organisation recognises that families and communities play a vital role in promoting and maintaining a safe environment for children and young people. We are committed to working in partnership with families and the wider community to support a strong, shared culture of child safety and wellbeing. We encourage our staff members, when engaging with children, to involve the families of those children whenever it is appropriate, and provided that doing so will not compromise the safety of the child.

We use the following measures to ensure that we have effective communication and participation strategies for engaging with and responding to the diverse needs of families and communities:

- **Open and Ongoing Communication** We maintain clear and regular communication with families about our child safety policies, expectations, and any updates or changes. This includes newsletters, parent meetings, emails, and accessible policy documents.
- **Family Education and Awareness** We provide information sessions, workshops, and resources to help parents and carers understand key child safety topics—such as online safety, recognising signs of harm, setting boundaries, and responding to disclosures.
- **Encouraging Input and Feedback** Families are invited to share their ideas, feedback, and concerns regarding our approach to child safety. This input is valued and used to inform policy reviews, improve practices, and strengthen trust.
- **Collaborative Problem-Solving** When issues arise, we work collaboratively with families to address concerns and ensure the best outcomes for the child. We respect family perspectives and aim to find solutions together.
- **Community Partnerships** We engage with local services, cultural organisations, and community leaders to promote broader awareness of child safety and to ensure our practices are culturally responsive and inclusive.
- **Inclusive and Respectful Engagement** We respect the diverse backgrounds of families and make efforts to communicate in culturally appropriate, inclusive, and accessible ways. Where necessary, we provide translation, interpretation, and alternative formats.
- **Shared Responsibility for Child Safety** We promote the message that child safety is a shared responsibility. By working together—children, families, staff, and community members—we create a safer environment where children can thrive.

How We Make Our Policies and Procedures Available

We strive to ensure that our child safe policies and procedures (including this Policy) are understood by all staff members and relevant stakeholders.

We strive to ensure that children who engage with our Organisation, as well as their families and relevant community members, are aware of, understand and have confidence in our child safety policies and procedures (including this Policy).

We ensure that our child-safe policies and procedures are clearly communicated and easily accessible to children, young people, and their families through the following methods:

- **Clear and Accessible Language** Policies are written in plain, age-appropriate language to help children and young people understand their rights, the standards of behaviour expected, and how to seek help if they feel unsafe or concerned.
- **Available Online and In-Person** All child safety and wellbeing policies are available on the organisation's website and in printed form at reception or another clearly designated area. Families are also welcome to request copies at any time.
- **Induction and Welcome Information** At enrolment or the beginning of participation, families receive a welcome pack or briefing that includes key information about our child-safe policies, reporting procedures, and contact details for the Children, Youth and Families Program staff members.
- **Ongoing Communication** Information about child safety is regularly reinforced through newsletters, posters, parent meetings, and child-friendly workshops or discussions.
- **Empowering Children and Young People** We regularly engage children and young people in conversations about safety and wellbeing using age-appropriate resources and activities. They are encouraged to ask questions, express concerns, and know where and how to get help.
- **Multilingual and Inclusive Formats** Where possible, information is provided in multiple languages and accessible formats to ensure all families can understand and engage with our child-safe policies, regardless of language, literacy, or disability.

Feedback From Children and Young People

The organisation values the voices of children and young people and actively seeks their input to ensure our child safe policies and practices are relevant, respectful, and effective. We are committed to creating a culture where children feel heard, empowered, and involved in shaping the environment around them.

To support this, we:

- **Create Safe Spaces for Expression** We foster an inclusive and supportive environment where children and young people feel comfortable speaking openly. Staff are trained to listen actively and respectfully, and to encourage participation in a nonjudgemental way.
- **Use Age-Appropriate Engagement Methods** Children are invited to share their thoughts and experiences through a range of methods suited to their age and abilities, such as informal discussions, suggestion boxes, surveys, drawings, storytelling, or group activities.
- **Regular Feedback Opportunities** We provide regular opportunities for children and young people to give feedback on how safe they feel and how we can improve. This may take place during program evaluations, one-on-one check-ins, or as part of structured group reflections.
- **Involve Children in Policy Development** Where appropriate, older children and young people are invited to contribute to the development or review of our child safe policy and related procedures. Their insights help shape guidelines that reflect their lived experiences and needs.
- **Show How Feedback is Used** We ensure that children see the impact of their feedback. When suggestions or concerns lead to changes or improvements, we communicate this clearly to show that their voices make a difference.
- **Provide Trusted Adults and Clear Pathways** Children are always informed about who they can speak to if they feel unsafe or have ideas for improving safety. We make sure they understand how to raise concerns, and we take all feedback seriously.

By actively involving children and young people, we strengthen our commitment to child safety and ensure our policies are grounded in real, meaningful participation.

How We Inform Children and Young People About Their Rights

The organisation is committed to upholding and promoting the rights of all children and young people, in line with the principles of the United Nations Convention on the Rights of the Child (UNCRC). We ensure that every child and young person involved in our services understands their rights—particularly their right to feel safe, to be treated with respect, and to have their voices heard – and feels empowered and supported to exercise them. We educate children and young people on what harm is and develop their understanding of protective practices.

This is achieved through:

- **Age-Appropriate Education and Conversations** We use child-friendly language and resources—such as posters, activities, stories, and videos—to help children understand what their rights are, including the right to safety, protection from harm, and to express their thoughts and feelings freely. These include simple messages such as: “You have the right to feel safe,” “You can say no,” and “We will listen to you.”
- **Embedding Rights into Daily Practice** Our staff actively promote children’s rights in everyday interactions and decision-making. We encourage respectful listening, give children choices, and model positive, inclusive behaviour that reinforces their value and dignity.
- **Regular Discussions and Workshops** Children and young people participate in regular sessions or informal discussions that focus on topics such as personal boundaries, body safety, respectful relationships, and how to speak up if they feel unsafe or uncomfortable.
- **Empowering Children to Speak Up** We encourage children to raise concerns, ask questions, or seek help without fear of being ignored or judged. Trusted adults are clearly identified and made available for private conversations when needed.
- **Partnership with Families** We work with parents and carers to reinforce messages about children’s rights at home, helping create a consistent approach that supports children’s understanding and confidence in expressing themselves.

Reviewing Our Child Safe Policies and Practices

We recognise that safeguarding is not a one-time action, but an ongoing process that requires regular reflection, evaluation, and adaptation. GRAICCHS is committed to continuously reviewing and enhancing its approach to child safety and wellbeing.

To ensure our policies and practices remain effective and up to date, we undertake regular policy review, support ongoing staff training and professional development, practice continuous improvement, seek feedback from children and families and promote a child safe culture.

Other Policies

In addition to this Child Safety Policy, GRAICCHS staff members are required to be familiar with, and to comply with, all other workplace policies which may apply from time to time, including:

- GRAICCHS Statement of Commitment to Child Safety
- GRAICCHS Child and Youth Risk Management Strategy (doc_627)
- GRAICCHS Code of Conduct (doc_329)
- GRAICCHS Child Protection Policy (doc_330)
- GRAICCHS Reporting Harm Policy (doc_624)
- GRAICCHS Screening Requirements for Working with Children (doc_625)
- GRAICCHS Privacy Policy and Agreement (doc_276)
- GRAICCHS Reportable Conduct Scheme Policy

Legislation

We are committed to complying with all laws and regulations as well as codes of practice and other safety guidance applicable to GRAICCHS operations in Queensland.