



Child Safe Policy



Purpose

Our Child Safe Policy serves as a clear demonstration of Prospr's unwavering commitment and obligation to creating a child safe organisation, via strict adherence to the Paramountcy Principle, Child Safe Standards, Care Act and other relevant legislation, UNCRC, Charter of Rights for Children in OOHC, and the Ten Essential Elements of Therapeutic Care as applicable to our agency. It provides guidance to all Prospr employees regarding our processes in ensuring children's safety and wellbeing across all areas.

It outlines our dedication to ensuring that all employees understand and actively support this promise, and that the children, families, and organisations we serve are aware of this too.

We acknowledge that a significant proportion of child abuse and neglect notifications in OOHC stem from the misconduct of casual, volunteer, and/or agency employees. Through our organisational values, policies and procedures, and everyday practices, we not only strive to reverse this trend of harm but also aim to ensure that children:

- Understand how adults should behave when supporting them.
- Are heard, valued, and respected regardless of their age, gender, sexuality, race, religion, ability, or cultural background.
- Can raise any concerns about themselves or their friends with comfort and ease.
- Have a say in the decision they are impacted by.
- Feel safe and confident in the adults supporting them.

Child Safe Commitment Statement

At Prospr, we are deeply committed to ensuring the safety, wellbeing, and empowerment of every child under our care. We recognise that safeguarding children requires steadfast dedication and vigilance from everyone involved. Our commitment extends to creating an environment that not only protects children but also nurtures their growth and development.

We are dedicated to promoting a safe environment for children from culturally diverse backgrounds and for children with disabilities. We understand the importance of inclusivity and accessibility in protecting children and ensuring that all children, regardless of their cultural background or abilities, feel valued, respected, and supported.

We employ various measures to uphold our commitment to child safety:

1) Employee Screening: All of our employees undergo comprehensive background checks, including Working with Children Check (WWCC) status verification, national police checks, reference verifications, and additional ongoing relevant assessments.

2) Competence and Development: We prioritise the continuous training, supervision, and development of our staff. By integrating trauma-informed and culturally sensitive approaches into our training programs, we ensure that our team is equipped with the necessary skills and knowledge to deliver the highest standard of care to children, respecting their unique needs and backgrounds.

3) Communication: We maintain open and transparent communication channels within our organisation and with external stakeholders. This includes fostering dialogue between our therapeutic youth workers and their supervisors, as well as facilitating effective communication between our management team and partner organisations. We actively seek and value feedback and complaints from our staff, partner organisations, and most importantly, the children and families we serve, empowering them to voice their concerns and suggestions. We take all allegations of harm or abuse seriously, and respond promptly and impartially, irrespective of the source or nature of the allegation.

4) Organisational Culture: Our organisational culture is centred around the wellbeing and safety of children. We base our values, policies, procedures, and practices on the Paramourncy Principle, ensuring that every decision and action prioritises the welfare of the children we serve. We uphold a zero-tolerance policy against child abuse and strictly adhere to the principles outlined in the Care Act and other relevant legislation, comply with the Child Safe Standards, uphold the United Nations Convention on the Rights of the Child (UNCRC), the Charter of Rights for Children in Out-of-Home Care (OOHC), and align with the Ten Essential Elements of Therapeutic Care as applicable to our agency.

Through our unwavering commitment to child safety and empowerment, we strive to create a nurturing and protective environment where every child can thrive and realise their full potential.

Scope & Audience

This policy applies to **ALL** staff who are employed by Prospr, including executive leadership, managers, and employees who provide direct services children.

The contents of this policy apply to **ALL** business actions and services of Prospr which involve, result in or relate to contact with children and their families.

Please also view our *Child Safe Code of Conduct*, *Risk Management Plan*, and our *Complaints Handling Policy & Procedure* available at: <https://prospr.care>

Responsibilities

Ensuring child safety is a collective responsibility among all employees; it is important to outline roles and responsibilities within Prospr to set clear expectations, and specify each employee's role in maintaining child safety.

Position	Responsibilities
All Employees	<ul style="list-style-type: none"> • Adhere to and actively promote the agency's Child Safe Policy and Child Safe Standards provided by the Office of the Children's Guardian. • Participate in relevant child safety training and development activities as directed and stay informed about updates to child protection laws and regulations. • Maintain confidentiality and privacy when handling sensitive information related to child safety matters. • Support and encourage a culture of transparency, accountability, and continuous improvement in promoting child safety within the organisation. • Advocate for the rights and best interests of children in care, ensuring their voices are heard and respected.
Director	<ul style="list-style-type: none"> • Endorse this Child Safe Policy. • Monitor organisational compliance with key frameworks and legislative requirements. • Maintain oversight of organisation wide child safe practices and procedures. • Allocate adequate resources and support to enable the effective implementation of child protection measures within Prospr. • Collaborate with relevant authorities and agencies to address any allegations or incidents of child abuse or neglect promptly and effectively. • Ensure that Prospr meets its reporting obligations by notifying the Office of the Children's Guardian within 7 days of receiving an allegation of child abuse or neglect involving a Prospr employee.
Child Wellbeing Officer	<ul style="list-style-type: none"> • Child Safe Policy owner, responsible for reviewing the policy annually, source and maintain employee training, and provide guidance on policy implementation to Supervisors & Direct Managers. • Ensure all employees have access to, understand, and receive support and training for this policy and related procedures. • Communicate any updates to this document and supporting resources with internal employees and relevant stakeholders. • Keep accurate records of any child safety reports and allegations. • Conduct regular risk assessments and audits to identify potential vulnerabilities or gaps in Prospr's child safety measures and recommend appropriate interventions.

	<ul style="list-style-type: none"> • Establish and maintain effective reporting mechanisms for staff members to raise concerns or incidents related to child safety, ensuring confidentiality and appropriate follow-up. • Stay informed on research, developments, standards, and guidelines in the field of child protection to inform the continuous improvement of the agency's child safe practices. • Be responsible for promoting the importance of child safety and how it applies to all employees.
Supervisors & Direct Managers	<ul style="list-style-type: none"> • Demonstrate understanding and commitment to children's rights and child safe practices within Prospr • Facilitate the implementation of child safe recruitment practices, including thorough background checks and screening procedures for employees working with children. • Ensure that all Therapeutic Youth Workers are informed, equipped, and supported to understand their responsibilities in maintaining a child safe environment, while also ensuring compliance with this policy. • Provide leadership in promoting and modelling an open, aware, and child-friendly culture within Prospr • Effectively train, supervise, and mentor Therapeutic Youth Workers in child safe practices, ensuring adherence to all relevant guidelines and requirements pertinent to their roles. • Act as a point of contact for employees and children to raise concerns or incidents related to child safety, ensuring appropriate reporting mechanisms are followed. • Offer prompt feedback and take swift action when an employee fails to fulfill their obligations under this policy.
Therapeutic Youth Workers	<ul style="list-style-type: none"> • Receive and engage in ongoing training and development related to child protection and safety measures. • Implement child safe practices and procedures in daily interactions and activities with children. • Identify, mitigate and manage risks to children. • Ensure children are engaged and are consulted about things that impact or affect them. • Comply with all relevant Prospr policies and procedures in your day-to-day care for children. • Promptly report any breach of this policy or potential risk to child safety, by others or yourself to your Supervisor or Direct Manager.

Definitions

For the purpose of this policy, definitions of key terms will be as below:

Term	Definition
Bullying	Repetitive and deliberate behaviour that involves the use of power or influence to intimidate, harm, or control others, often causing physical, emotional, or psychological distress to the victim.
Child/Children	All children and young people under the age of 18.
Child Abuse	<p>Any action or lack of action which significantly harms or has potential to harm a child's sexual, or physical, or psychological (emotional) health and development. The four categories of abuse are:</p> <p>Sexual: Any acts involving the sexual touching of a child, grooming, and production, distribution or possession of child abuse material; including:</p> <ul style="list-style-type: none"> - Sexual Offences: A child-related criminal offence of a sexual nature. - Sexual Misconduct: A conduct with, towards or in the presence of a child that is sexual in nature but is not a sexual offence. <p>Psychological (emotional): Behaviour that causes significant psychological or emotional harm that is intentional or reckless (without reasonable excuse), obviously or very clearly unreasonable and that results in significant emotional harm or trauma to a child.</p> <p>Physical: Acts which involve physical punishment towards children, such as pushing, shoving, punching, slapping and kicking, resulting in injury, burns, choking or bruising.</p> <p>Neglect: A significant failure by a person with parental responsibility for the child, or an employee, to provide adequate and proper food, supervision, nursing, clothing, medical aid or lodging for the child that causes or is likely to cause harm to the child. Types of neglect include physical, medical, emotional and educational neglect, as well as abandonment, and can be deliberate or intentional.</p>
Child Safe Culture	A set of values and practices that guide the attitudes and behaviour of all staff.
Child Safe Practices	Child safety requirements and practice adopted and implemented to help ensure the safety of children.
Child Safe Organisation	<p>An organisation that:</p> <ul style="list-style-type: none"> • Creates conditions to reduce the likelihood of children being harmed. • Creates conditions that increase the likelihood of identifying and reporting harm. • Responds appropriately to disclosures, allegations and suspicions of harm.

Code of Conduct	A document which specifies behaviours expected of all people of the organisation when engaging with children.
Complaint	Any suggestions of child abuse or harm disclosed, witnessed, or demonstrated.
Disclosure	A child communicating (through words, drawings or actions) to someone that they feel unsafe or has been harmed.
Duty of Care	The legal and moral obligation of individuals or organisations to ensure the safety, wellbeing, and development of children under their supervision or responsibility, taking reasonable steps to prevent harm and promote their best interests.
Employee	A person that is hired to provide a service to Prospr, either on a full-time, part-time or casual basis in exchange for payment.
Environmental Risk	An organisation's physical and online spaces that may provide opportunities for abuse to occur.
Grooming	The manipulation of a child and the people caring for the child to enable a perpetrator to establish trust in order to later sexually abuse them.
Harm	Any adverse impact on a child's health, safety, or wellbeing resulting from abuse or neglect, encompassing physical, psychological (emotional), and sexual. Harm can be caused by a single act, or a series of acts.
Mandatory Reporting	The legislative requirement for selected classes of people to report suspected child abuse and neglect to government authorities.
Organisational Risk	An organisation's culture that may make abuse more likely to occur or less likely to be dealt with.
Propensity Risk	A greater-than-average cluster of adults within an organisation with a propensity to abuse children.
Reportable Allegation	A reportable allegation is an allegation that an employee has engaged in conduct that may be reportable conduct.
Reportable Conduct	As defined in the children's Guardian Act 2019, reportable conduct is: A sexual offence, A sexual misconduct, ill-treatment of a child, neglect of a child, an assault against a child, an offence under s 43B (failure to protect) or s 316A (failure to report) of the Crimes Act 1900; and behaviour that causes significant emotional or psychological harm to a child.
Reportable Conviction	A conviction (including a finding of guilt without the court proceeding to a conviction), in NSW or elsewhere, of an offence involving reportable conduct.
Risk Management	Process of identifying the potential for an incident or potential harm to occur and taking steps to reduce the likelihood of its occurrence.
Report	Official notification to authorities regarding suspected or witnessed child abuse, prompting necessary interventions to ensure the child's safety and wellbeing.
Vulnerability Risk	Characteristics of children that increase their susceptibility to abuse (e.g., age).

Child Safe Code of Conduct

Our *Child Safe Code of Conduct* sets the boundaries and expectations for appropriate behaviours and conduct between Prospr employees, and the children they serve. It identifies positive child safe behaviours that we encourage all Prospr employees to support. It also clarifies behaviours that we consider unacceptable.

Engaging in unacceptable behaviour is a breach of our *Code of Conduct* and will result in managerial or disciplinary action for our employees. Some examples of concerning behaviours are also provided in our policy. These are behaviours that on their own may not constitute a breach of the *Code of Conduct* but together may indicate a pattern of behaviour that poses a risk to the safety of children.

Our complete *Child Safe Code of Conduct* can be accessed on our website:

Link: <https://prospr.care/code-of-conduct>

Perpetrators of Abuse

Research into child protection has identified three types of offenders:

Type	General Characteristics
Determined	<ul style="list-style-type: none">• Has an unambiguous sexual interest in children.• Prepared to invest effort if necessary and may become adept at creating opportunities to offend and avoiding detection.• May be quite skilled at grooming children (and the caring adults in their life) to make sure they have access to children and that their abuse goes undetected.
Opportunistic	<ul style="list-style-type: none">• Will exploit chances for personal gain at the expense of others.• Has no special or unusual sexual interest in children, and will only sexually abuse in low-risk, low-effort situations.• More likely to exploit a small lapse in child safe practice
Situational	<ul style="list-style-type: none">• Often has adequate self-control and is sensitive to informal social controls.• Will succumb to temptation in specific sets of circumstances.

Making sure opportunistic and situational offenders don't offend generally requires protective strategies such as increased supervision and monitoring and the use of natural surveillance.

See our Child Safe Risk Management Plan to better understand how we deter perpetrators of abuse, and minimise the risk of harm to children:

Link: <https://prospr.care/risk-management-plan>

Grooming

Grooming is a manipulative process used by perpetrators to establish trust and control over a child or their close networks, which doesn't necessarily involve immediate sexual acts and can be difficult to detect due to its gradual and subtle nature. Grooming behaviours can also be disguised as innocent, with the harm only being identified when a pattern of behaviour or sexual intention is revealed. Approximately 25 percent of child abusers rely on grooming, and so it is important to be aware of the indicators. **The below behaviours are strictly prohibited for all Prospr employees and should be promptly reported to your supervisor.**

Setting	Potential Indicators
Breach of professional conduct (professional setting)	<ul style="list-style-type: none"> • Discussing intimate personal matters with the child that you would only normally discuss with close associates, including marriage breakdowns or other family concerns. • Arranging meetings with a child in an area that does not have natural surveillance such as a locked room, cafe or the child's home.
Breach of professional conduct (non-professional setting)	<ul style="list-style-type: none"> • Inviting a child to your award ceremonies or other special events. • Attending events not related to the professional relationship, such as birthday parties.
Manipulating situations to be alone with a child	<ul style="list-style-type: none"> • Seeking information about the child's movements and activities outside the professional setting. • Finding reasons to contact the child outside of the professional setting such as delivering 'missing' homework or sharing computer games.
Secondary employment	<ul style="list-style-type: none"> • Offering to babysit in breach of an organisation's <i>Child Safe Code of Conduct</i>. • Offering tuition or mentoring, particularly if this gives the person time alone with a child.
Non-professional communication	<ul style="list-style-type: none"> • Sending personal emails, letters or private messages on social media. • Asking a child to keep the contact secret. • Arranging to meet a child in a secluded or secret setting.
Gifts and Benefits	<ul style="list-style-type: none"> • Giving a child or group of children gifts in secret or at the exclusion of others. • Paying for a child to attend events such as football games or concerts.
Physical contact	<ul style="list-style-type: none"> • Engaging in activities that result in touching such as rough play, wrestling or tickling. • Hugging a child (not to comfort) or insisting a child hugs them. • Sitting a child on your lap.

Special treatment	<ul style="list-style-type: none"> • Showing favouritism and allowing a child to break the rules. • Allowing a child to access your smart phone or other devices. • Giving a child birthday or Valentine's Day cards.
Influencing guardianship or other professionals	<ul style="list-style-type: none"> • Manipulating a parent or guardian to make them believe you are a person of integrity or expertise. • Telling a child your 'friendship' should be a secret. • Using persuasion to convince colleagues to overlook concerning behaviours. • Gaslighting or undermining the credibility of colleagues who express concerns about unsafe behaviour.
Desensitisation	<ul style="list-style-type: none"> • Flattering, or complimenting a child • Purporting to have a 'special relationship' with a child. • Normalising physical contact through non-sexual touch.

Types of Abuse and their Indicators

While our Child Safe Code of Conduct is well-defined, it lacks detailed instructions or guidance for Prospr employees regarding the nature and signs of abuse experienced by children.

Sexual offences and misconduct

Under no circumstances are any Prospr employees to engage in any sexual behaviours with, or in the presence of the children they support, regardless of their age.

This consist of but is not limited to:

- **Contact behaviour:** Including sexual intercourse, kissing, fondling, sexual penetration, and exploiting a child through prostitution.
- **Non-contact behaviour:** Including flirting, sexual innuendo, inappropriate text messaging, inappropriate photography, and exposure to pornography or nudity.
- **Sexual misconduct:** Descriptions of sexual acts without a legitimate reason to provide the descriptions, sexual comments, conversations or communications, or comments to a child that express a desire to act in a sexual manner towards the child, or others.

Some **indicators of a child being Sexually abused** may include:

- Physical signs such as difficulty walking or sitting, pain or itching in the genital area, or presence of sexually transmitted infections.
- Sudden changes in behaviour, such as becoming withdrawn, anxious, or overly hostile.
- Regression to earlier behaviours, such as bedwetting or thumb sucking.
- Experiencing nightmares or sleep disturbances.
- Avoidance of specific people or places, especially without explanation.
- Sudden reluctance to participate in activities they once enjoyed.

- Displaying sexual knowledge or behaviour inappropriate for their age.
- Engaging in self-harming behaviours or attempting suicide.
- Difficulty concentrating or declining academic performance.

Physical Abuse

Under no circumstances are any Prospr employees to engage in any physically abusive behaviours, or behaviours which may lead to physical abuse.

This consists of but is not limited to:

- An adult losing their temper and hitting a child.
- An adult employing aggressive and violent methods to discipline a child.
- An adult bullying a child.
- An adult encouraging, or being complicit in another or person bullying a child.

Some **indicators of a child being Physically abused** may include:

- Unexplained bruises, welts, cuts, or burns, especially in unusual patterns or on areas not typically injured accidentally.
- Frequent injuries or injuries that are inconsistent with the explanation given.
- Avoidance of physical contact or flinching at sudden movements.
- Fear or anxiety when asked about injuries or reluctance to be with certain individuals.
- Wearing clothing inappropriate for the weather to conceal injuries.
- Changes in behaviour such as aggression, withdrawal, or sudden mood swings.
- Sudden decline in academic performance or participation in activities.
- Delay in seeking medical attention for injuries or repeated injuries without medical care.

Psychological (emotional) Abuse

Under no circumstances are Prospr employees to engage in any Psychologically abusive behaviours, or behaviours which may lead to psychological abuse.

This consists of but is not limited to:

- Persistent undermining of a child's confidence.
- Using inflammatory or derogatory language with children.
- Letting children know they are not at the adult's standard.
- Excluding certain children who are seen as weaker or less likeable than other children.
- Encouraging, or being complicit with children using defamatory or belittling language towards others.

Some **indicators of a child being Psychologically abused** may include:

- Constantly feeling worthless about life and themselves.
- Unable to value others.

- Lack of trust in people.
- Lack of people skills necessary for daily functioning.
- Extreme connection-seeking behaviour, and obsessively eager to please or obey adults.
- Takes extreme risks, or is markedly disruptive, bullying or aggressive.
- Highly self-critical, depressed or anxious.
- Suicide threats or attempts.
- Persistently runs away from home.

Neglect

Under no circumstances are any Prospr employees to engage in any Neglectful behaviours, or behaviours which may lead to neglect.

This consists of but is not limited to, failure to provide :

- Reasonable medical attention.
- Adequate supervision.
- Adequate nourishment (food and liquids).
- Appropriate shelter, sunscreen, or clothing.

Some **indicators of a child being Neglected** include:

- Child is always hungry and looks malnourished or dehydrated.
- Child steals food or hoards food/food wrappers.
- Child generally presents as unclean.
- Child has medical needs that do not appear to be met.

Dimensions of Risk

Dimension	Examples
Environmental Risk	<ul style="list-style-type: none"> • Adults being alone with children (residential settings, allow more opportunities for adults to be alone with children) • Adults forming relationships with children that could involve physical contact and emotional closeness.
Organisational Risk	<ul style="list-style-type: none"> • Leaders not supporting or prioritising child safety . • An emphasis on power, aggression, strength and competition. • A lack of understanding or awareness of child abuse. • Protection of an organisation's reputation over the safety of a child. • Unclear expectations around staff-child relationships. • Not listening to and respecting children. • Close-knit and longstanding relationships between co-workers. • Children not having access to a trusted adult. • Ineffective child safe policies and procedures. • Inadequate reporting processes.

Propensity Risk	<ul style="list-style-type: none"> • Men are 4 times more likely to sexually abuse children • Women are 55% more likely to neglect children, and 16% more likely to assault children. <p>https://www.parliament.nsw.gov.au/tp/files/186855/OCG%20Annual%20Report%202022-23.pdf</p>
Vulnerability Risk	<ul style="list-style-type: none"> • Age - Certain ages pose higher risks for specific forms of abuse in children. • Physical or intellectual disability. • Not feeling confident to speak up. • Having experienced prior maltreatment. • Out-of-home care arrangements or challenging home environments. • Children from Culturally and Linguistically Diverse (CALD) backgrounds.

Supervision of Children

Our supervision of children is conducted in accordance with their individual case plans and/or behaviour support plans, which may include specifications such as maintaining line of sight. This ensures that children receive appropriate support and guidance tailored to their specific needs and circumstances. By adhering to these plans and maintaining attentive supervision at all times, we aim to create a secure and nurturing environment where children can thrive under our care.

Transportation of Children

We always seek consent from both the child and their parents/guardians prior to transporting them. Clear information regarding the journey, including the mode of transport, individuals accompanying the child, the reason for transportation, and a general route overview, is provided to ensure transparency and informed decision-making. Through clear communication, safe driving practices, and dedication to providing a positive experience, we ensure that every journey is conducted with the utmost comfort, care, and professionalism.

Managing drop-offs and pickups:

Prospr implements a stringent procedure for managing drop-offs and pickups. Whenever a child is being dropped off or picked up, it is imperative that a detailed handover occurs with a parent, carer, or designated youth worker. This handover process ensures clear communication regarding the child's arrival or departure, any pertinent information about their care or activities during their time with us, and any special instructions or concerns that need to be addressed.

Online Communication & Social Media

All Prospr employees are strictly prohibited from posting about or adding children and their families on their personal social media accounts, and messaging with them online or through social media. Violation of our social media and online communication policies, found in the *Employee Handbook*, may result in heightened supervision, reassignment to a different role, suspension, or termination from the organisation. These policies aim to protect the privacy and wellbeing of children under Prospr's care in all spaces, including online, fostering a secure and supportive environment at all times.

Photography & the use of images

We prioritise the privacy and dignity of the children under our care, especially when it comes to the use of photography and images. While photos of children for work-related purposes, such as adding to their life-story profile, are permitted, they must be taken on the work phone at the child's home. In instances where a work phone is unavailable, photos taken on personal phones must be promptly deleted upon the submission of shift notes and life story photos. This protocol ensures that children's images are handled with the utmost care and respect, maintaining their confidentiality and safeguarding their rights at all times. Additionally, it is imperative that explicit consent is obtained from both children and their parents/guardians before taking any photographs.

Alcohol, Drugs, Cigarettes, Vapes, & Pornography

We maintain a strict zero-tolerance policy regarding the use of alcohol, drugs, cigarettes, vapes, and pornography in the presence of children. Under no circumstances are employees permitted to offer or condone the use of these substances or materials to children. Additionally, employees must refrain from being under the influence of alcohol, drugs, or any other intoxicants while supporting children.

Gifts & Benefits

We uphold strict guidelines regarding the exchange of gifts between employees and children or their families. Employees are prohibited from accepting gifts or favours from children or their families that could create a perceived conflict of interest. Furthermore, employees must not give gifts, food, or money to a child without prior approval from management. These measures are in place to ensure transparency, maintain professional boundaries, and safeguard the welfare of the children under our care.

It is also impermissible to provide gifts to children in secret or exclude others from receiving them, as well as to cover expenses for a child's attendance at events such as football games or concerts. Moreover, demonstrating favouritism towards any child, including allowing certain individuals to bend or break rules while enforcing them strictly with others, is strictly prohibited. These guidelines are established to maintain professionalism, ensure equitable treatment, and safeguard the wellbeing of all children under our care

Personal & Intimate Care

Children can become more vulnerable to sexual and physical forms of abuse during personal and intimate care, as they rely on the assistance of an adult to perform this task. For this reason, it is crucial to prioritise the wellbeing and autonomy of children during personal and intimate care procedures. This involves seeking explicit and informed consent from both children and their parents or guardians before any such interaction occurs, ensuring that their rights and boundaries are respected and upheld throughout the process.

Additionally, we implement safeguards such as having a second employee present during personal care activities to increase natural surveillance and provide an additional layer of protection. We actively educate children about their rights and boundaries regarding appropriate touch and personal intimate care, empowering them to assert themselves and communicate their preferences effectively. Through these measures, we aim to create a safe and supportive environment where children feel respected, valued, and empowered in their interactions with employees.

Physical Contact with Children

We maintain a strict policy regarding appropriate physical touch with children to ensure their safety and comfort at all times. Employees are prohibited from engaging in unwarranted or inappropriate physical contact, including corporal punishment, unnecessary or unwanted touch, massages, or engaging in tickling. Furthermore, any display of unacceptable physical affection, such as closed hugs, kisses, handholding (except for safety reasons), and caressing, is strictly prohibited. These guidelines are in place to uphold the dignity and wellbeing of the children under our care and to maintain a safe and respectful environment for all interactions.

Illness Management

All employees who work directly with children are required to promptly notify Prospr management or their supervisor if they are feeling unwell, ensuring that they do not transmit any illness to the children and their families, or within the homes of the children under our care.

Out-of-hours Contact & Professional Boundaries

All employees are prohibited from initiating any form of contact outside of their rostered working hours, whether physical or online, with children, their families, or any other individuals connected to them. Sharing personal information unrelated to the care or development of children, such as marriage breakdowns or family concerns typically reserved for close associates, is strictly prohibited unless it serves the purpose of establishing rapport or therapeutic relationships. Furthermore, employees must refrain from displaying excessive interest in the personal lives or activities of specific children beyond what is necessary for their care or support.

Moreover, arranging meetings with children in areas lacking natural surveillance, such as locked rooms, cafes, or the child's home, inviting children to personal events like award ceremonies, or attending gatherings unrelated to the professional relationship, such as birthday parties, are strictly prohibited. These measures are essential to uphold professional standards and safeguard the privacy and wellbeing of the children under our care.

Child Safe Risk Management Plan

Child safety cannot occur without effective risk management. Managing risk supports a culture of safety that includes communication, reporting, transparency, and governance. If risks are not managed well, children can be harmed.

Our *Child Safe Risk Management Plan* intends on:

- 1) Reducing the likelihood of children being harmed or abused.
- 2) Repelling child abuse perpetrators from joining Prospr
- 3) Instilling employee confidence to work with children in a safe, structured manner.
- 4) Focusing on prevention, as opposed to responding to child abuse.
- 5) Guiding the development of our policies, procedures and codes of conduct.

The complete version of our *Child Safe Risk Management Plan* can be accessed on our website:

Link: <https://prospr.care/risk-management-plan>

Recruitment & Employee Screening

In line with our commitment to child safety, Prospr implements rigorous recruitment procedures designed to safeguard children. Prospective employees are required to undergo thorough screening processes, including validation of a current and clear Working with Children Check (WWCC), NDIS worker orientation module, NDIS Worker Check (NDISWC), current national police check, demonstration of qualifications pertinent to working with children, and comprehensive background and reference checks. These measures are essential to our commitment to ensuring that employees working with children are the most suitable and safe, thus maintaining a secure and nurturing environment for the children entrusted to our care.

Employee Inductions, Training, & Support

We prioritise the implementation of comprehensive child safe practices throughout our organisation, including robust induction, training, and employee support systems. When joining our team, employees undergo thorough induction programs that cover training on mandatory reporting processes for suspected child abuse. We also provide education on identifying the various forms of child abuse, and strategies for mitigating associated risks. Our training initiatives extend to encompass trauma-informed and culturally sensitive approaches, ensuring our employees are equipped to support children from diverse backgrounds with sensitivity.

Additionally, we facilitate regular one-on-one supervision sessions between employees and their supervisors, providing personalised guidance, monitoring progress, addressing challenges, and identifying areas for improvement. Through these initiatives, we foster a culture of vigilance, competence, and continuous improvement in our commitment to safeguarding the wellbeing of the children under our care.

Compliance with Relevant Legislation & Standards

Child Safe Standards

Prospr is unwaveringly committed to upholding the Office of the Children's Guardian child safe standards, which have served as the cornerstone guiding all our policies and practices, ensuring the utmost safety and wellbeing of the children we support. We also align our practices with the standards set forth in the *United Nations Convention on the Rights of the Child*, the *Charter of Rights for Children in Out-of-Home Care (OOHC)*, and the *Ten Essential Elements of Therapeutic Care* as applicable to our agency.

The OCG Child Safe Standards are specifically addressed in our *Child Safe Risk Management Plan*, and are:

The Child Safe Standards



Relevant Legislation

Regular consultation with the Fair Work Ombudsman and Commission further strengthens our dedication to maintaining a child safe environment. Through proactive collaboration and adherence to legal frameworks, we continuously strive to enhance our practices and safeguard the welfare of the children entrusted to our care.

In addition to the *Children and Young Persons (Care and Protection) Act 1998*, Prospr also abides by the:

Legislation	Relevance
<i>Children’s Guardian Act 2019</i>	<ul style="list-style-type: none"> • Legislated Child Safe Scheme • Outlines requirements for reportable conduct and responding to allegations or suspicions of child abuse or neglect • Child Safe Standards, Policies and Processes • Capacity Building • Reviews and Monitoring • Responsibilities of organisation heads under the Reportable Conduct Scheme
<i>Child Protection (Working with Children) Act 2012 & Child Protection (Working with Children) Regulation 2013</i>	<ul style="list-style-type: none"> • Provides for the WWCC scheme in New South Wales, assessing the suitability of individuals to work with children
<i>Civil Liability Act 2002</i>	<ul style="list-style-type: none"> • Organisational duty of care requirements (<i>Part 1B Division 2</i>)
<i>Crimes Act 1900</i>	<ul style="list-style-type: none"> • Failure to protect offence (s.43B) • Failure to report offence (s.316A) • Provides legal mechanisms for prosecuting perpetrators of child abuse and protecting children from harm
<i>Disability Inclusion Act 2014</i>	<ul style="list-style-type: none"> • Recognises the rights of children with disabilities to access services and supports, and prohibits discrimination against them. • Provides safeguards in relation to the delivery of supports and services for people with disability.
<i>Anti-Discrimination ACT 1977</i>	<ul style="list-style-type: none"> • Prohibits discrimination on various grounds, including race, sex, gender identity, sexual orientation, disability, and age • Ensures that children have equal opportunities and rights regardless of their personal characteristics.
<i>Privacy Act 1988 (Cth.)</i>	<ul style="list-style-type: none"> • Regulates the handling of personal information, contributing to child safety by ensuring sensitive data is securely managed. • Stipulates consent requirements and safeguards against exploitation, helping organisations comply with reporting obligations for child abuse or neglect.

Complaints & Incident Handling Procedure

Our comprehensive incident and complaint handling procedure at Prospr is designed to be easily accessible, ensuring that any concerns or incidents involving children can be addressed promptly and effectively. It covers various types of complaints and incidents, including but not limited to allegations of misconduct, breaches of child safety protocols, or any behaviour that may compromise the safety of children. Key roles and responsibilities are clearly outlined, defining the roles of staff members, supervisors, and designated child safety officers in managing and resolving complaints and incidents.

Complaint submission channels are provided to encourage individuals to report any concerns they may have, with assurance of confidentiality and non-retaliation. Upon receipt of a complaint, a thorough assessment is conducted to determine the severity and urgency of the matter, followed by an appropriate investigation process. Depending on the nature and seriousness of the complaint, escalation processes are in place to involve higher-level management or external authorities if necessary, ensuring that all complaints and incidents are handled with the utmost care and diligence to safeguard the wellbeing of children. Additionally, we track minor breaches and record them within our organisation, and we fulfil external mandatory reporting obligations as required under the *Children and Young Persons (Care and Protection) Act 1998*.

Our complete reporting policy and guide, along with our incident reporting forms can be found on our website <https://prospr.care/oohc-feedback%2Fcomplaints-1>

Publication

Our Child Safe Policy is a foundational document that outlines Prospr's commitment to ensuring the safety and well-being of children in our care. To ensure transparency and accessibility, this policy will be published on our website, making it readily available to all stakeholders, including employees, children and their families, partner organisations, and the wider community. Furthermore, this policy will not merely serve as a static document but will continue to be actively implemented and reinforced through our daily practices. We are dedicated to embedding child safety principles into every aspect of our operations, from recruitment and training to service delivery and monitoring.

As part of our commitment to maintaining a safe environment for children, all employees will receive comprehensive training and induction sessions. These sessions will not only familiarise them with the contents of this policy but also provide practical guidance on how to recognise, prevent, and respond to child safety concerns effectively. By integrating child safety practices into our organisational culture and operations, we strive to create a protective environment where children can thrive and flourish.

Review

This policy will be reviewed annually at a minimum, and following any critical incidents to ensure its ongoing suitability and alignment with best practices in child safety. The responsibility for leading the review process lies with the Child Wellbeing Officer, who will coordinate evaluations to assess the policy's effectiveness, identify areas for improvement, and gather feedback from stakeholders, including children and their families where possible.

This Child Safe Policy was approved by Prosr Director on 12 February 2024 and came into effect immediately. For more information or assistance regarding this policy, individuals within the organization can reach out to.

The next scheduled review of this policy is set for 12 February 2025 and the Child Safety Officer is responsible for overseeing the review process. We value the input of children and their families in this review process, ensuring that their voices are heard and considered in maintaining a safe environment for all.

Last reviewed: 12 February 2024
Next review date: 12 February 2025
Responsible officer: Kenan Akkoc
(Child Wellbeing Officer)