



# Child Protection Policy

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January 2026

## Purpose

No Limits Disability (NLD) is committed to the safety and wellbeing of all children and young people. We will ensure that our commitment to child and youth safety and wellbeing is embedded within our organisation's culture, that it is reflective in our policies and procedures, and that it is understood and practiced at all levels of the organisation.

We will inform all representatives of their obligations to act ethically towards children and young people and ensure they understand their roles and responsibilities in ensuring the safety and wellbeing of children. As required, we will provide guidance on the processes and procedures that aim to ensure children's safety and wellbeing is across all areas of our work.

## Scope

This Policy applies to all representatives of NLD.

## Definitions

**Child or young person:** for the purposes of this policy is a person who is under 18 years of age.

**Representative:** refers to employees, volunteers, consultants, contractors, board members, committee members, students on placement, people undertaking work experience, visitors and guests.

**Workplace:** refers to any location / time where NLD staff deliver a service. This includes NLD office areas, schools or public places such as community centres or event venues.

**Child abuse:** means all forms of physical abuse, emotional abuse and sexual abuse and exploitation, neglect or negligent treatment, commercial or other exploitation of a child and includes any action that results in actual or potential harm to a child or damages their prospects of safe and healthy development into adulthood. Child abuse may be a deliberate act or a failing to act to prevent harm.

Child abuse may also occur through online platforms and certain types of online communication may constitute child abuse. Such communication can include, but is not limited to, a child being asked inappropriate or personal questions; a child being sent inappropriate or offensive content; or a child being asked to send or receive intimate images or to do things in an online setting that makes them feel uncomfortable.

**Board:** means the Board of No Limits Disability (ACN 659 429 042).

**Child Protection:** as it relates to this Policy is defined as any responsibility, measure and activity undertaken to safeguard children from both intentional and unintentional harm.

**Code of Conduct:** means the document entitled 'Code of Conduct' released by NLD .

**Working environment:** means working space where NLD delivers its services. Working environments can include, but are not limited to, face-to-face delivery on a premises, any learning centre or in the community centres or venues.

**Regulatory guidance:** means any guidance, practice notes, directives, updates and regulation published by State, Territory or Federal Relevant Authorities.

## Responsibilities

Each representative is required to comply with this Policy and must:

- agree to abide by this Policy;
- sign and return the Code of Conduct to their Manager as soon as possible. May include electronic signature in online HR systems;
- contribute to a learning environment in which children are respected and their safety and protection is always promoted;
- Immediately report any child abuse observed in any NLD working environment in accordance with the Reporting Procedures;
- respond to any child who may have been abused in accordance with the Reporting Procedures;
- cooperate fully and confidentially with any investigation.

### The Board

In accordance with the National Principles for Child Safe Organisations, it is the responsibility of the Board to ensure that NLD has appropriate policies, procedures and culture, as well as effective internal control systems, in place. The Board is also responsible for ensuring NLD 's strategic plans about our mission are developed with specific consideration of child safety. It is the responsibility of the Board Chair to ensure that all Board members:

- are aware of and comply with the relevant legislation;
- are aware of and comply with all organisational policies and procedures in relation to child protection;
- are aware of and comply with NLD 's Code of Conduct; and
- have the knowledge, skills and capabilities required to comply with their obligations under this Policy, the Code of Conduct, any relevant law and/or regulatory guidance.

### CEO

It is the responsibility of the CEO to respond swiftly to any concerns relating to, or allegations of, child abuse, and keep their Board regularly informed as to compliance with this Policy as well as the status of any concerns or allegations raised within or concerning NLD, and ensure those concerns are expressed in a manner that is consistent with confidentiality obligations.

The CEO must also ensure that all NLD managers:

- are aware of and comply with the relevant legislation;
- are aware of and comply with all organisational policies and procedures in relation to child protection;
- are aware of and comply with NLD 's Code of Conduct; and

- have the knowledge, skills and capabilities required to comply with their obligations under this Policy, the Code of Conduct, any relevant law and/or regulatory guidance.

### **Human Resources**

Should any concerns relating to, or allegations of, child abuse be raised within NLD, it is the responsibility of the relevant Manager, in consultation with the Human Resources Manager to escalate the issue to the CEO immediately and to ensure confidential and accurate records are kept of these concerns or allegations and any steps taken under the Reporting Procedure for their resolution.

The Human Resources Manager must:

- ensure that each staff member has read and understood this Policy, the Code of Conduct and other child protection related policies;
- ensure all volunteers have read and understood this policy and the Code of Conduct;
- maintain a register of those representatives of NLD who have been trained in child protection;
- ensure that all volunteers, including members of committees are appropriately trained in child protection;
- ensure that every staff member and volunteer has a valid working with children check (Blue Card) both prior to working with NLD and throughout their engagement with the organisation;
- ensure that any person involved in the recruitment process complies with the relevant recruitment policies and procedures; and
- keep accurate records of the above.

### **Managers**

It is the responsibility of all Managers to ensure they promote child safety at all times and that their staff are aware of and comply with this policy and related child protection policies. This responsibility includes:

- to induct all new staff to this Policy during their period of induction and onboarding;
- to ensure representatives receive child protection training as necessary for their role;
- to lead the embedding of a child safe culture within their area, and to proactively seek out, identify and address any issues or concerns;
- the promotion of child safety in all environments;
- the assessment of the risk of such abuse within their areas of control;
- efforts to minimise any risks posed to child safety and protection, to the extent possible; and
- the facilitation of reporting of any inappropriate behaviour or suspected child abuse in any environment; and
- ensuring staff have the knowledge, skills and capabilities required to comply with their obligations under this Policy, the Code of Conduct, any relevant law and/or regulatory guidance.

### **Representatives**

It is the responsibility of representatives of NLD to familiarise themselves with the relevant legislation and regulatory guidance concerning child abuse, including online child abuse.

Representatives must:

- understand and comply with NLD 's child protection policies and procedures;
- understand and comply with the Code of Conduct;
- provide and promote an environment and culture that is supportive of children and young people's emotional and physical safety.

- in the event of a reasonable belief that a child or young person's safety is at risk, follow the Reporting Policy; and

## Relevant Legislation and Standards

NLD child protection policies and procedures are based upon and align with the following legislation, regulations, external policies and standards:

- [Child Protection Act 1999 \(Qld\)](#)
- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [The United Nations Convention on the Rights of the Child](#)
- [National Principles for Child Safe Organisations](#)

## Related Organisational Policies and Procedures

- Child and Youth Risk Management Strategy
- Code of Conduct
- Complaints Handling Procedure
- Handling Disclosures Procedure
- Child Protection Report Form
- Responding to Concerns or Allegations of Misconduct Towards Children and Young People Procedure
- Use of Children's Images Policy
- Mascot Policy
- Recruitment Procedure
- Activities and Special Events Risk Management Plan

## Statement of Commitment

NLD has developed as stated below a statement of commitment to the safety and wellbeing of children and young people, and the protection of children and young people from harm.

NLD hold the safety and wellbeing of children above all else. Child safety is at the heart of everything we do. We strive to provide an environment that is culturally, physically, emotionally, and socially safe and inclusive for all children. We are committed to listening to, responding to and elevating the voices of children to ensure their needs and lived experiences are reflected throughout our work and we can support and empower them to lead safe and healthy lives.

## Policy

The following Child Protection Policy outlines how NLD promotes child safety and wellbeing through implementation of the ten National Principles for Child Safe Organisations.

### 1. Leadership, Governance and Culture

- 1.1. NLD always strives to promote the safety, protection and wellbeing of children and young people.
- 1.2. Our staff must demonstrate the practices, behaviour and relationships consistent with our organisational values, Code of Conduct, Child Protection Policy and our HR policies and procedures in all their interactions with children and young people. These documents will be read, understood, and signed by staff upon commencement of employment or engagement, and followed at all times during their employment or engagement.

- 1.3. Our staff must actively discourage and immediately report to management any behaviour which would be considered a breach of any of the organisation's policies.
- 1.4. We must comply with our obligation under the United Nations Convention on the Rights of the Child, Child Protection Act 1999, Working with Children (Risk Management and Screening) Regulation 2020, and other relevant laws, regulations, standards and quality frameworks, accreditation, licensing and contractual obligations when working with children and young people, as they apply to our service.
- 1.5. Having undertaken a risk assessment of our organisation's activities and functions (Appendix A), we provide clear guidelines to mitigate risks of child abuse that have been identified and assessed as material, in order to ensure residual risk is low.

## **2. Children and Young People's Participation and Empowerment**

- 2.1. We consistently promote a child and youth safe inclusive culture that places a high priority on ensuring our service environments promote the empowerment and participation of all children and young people, including those with particular needs and vulnerabilities.
- 2.2. We recognise that friendships and peer support are important in helping children and young people feel safe, supported and connected.
- 2.3. Upon commencement of our program delivery to groups of children or young people, staff encourage and support them to develop an agreement that outlines expectations of appropriate behaviour between themselves and staff.
- 2.4. Our program content and resources educate children and young people about their rights, safe environments, protective strategies for staying safe and seeking help when needed.

## **3. Family and Community Involvement**

- 3.1. NLD are to promote this policy and make it readily accessible to any child, young person, parent, carer or other stakeholder to ensure a clear understanding of our commitment to the safety and wellbeing of all children and young people who access our services.
- 3.2. Families are encouraged to participate in decisions affecting their child/ren, where it will not compromise the safety of the child or young person.
- 3.3. Our staff are to engage with families and communities and listen to their views regarding our child and youth safe practices, policies and procedures. Information shared will help inform our practices and procedures.
- 3.4. Parental consent is obtained prior to any child or young person participating in photographs or videos that may be used for media or marketing purposes, as per our Use of Children's Images Policy.

## **4. Equity and Diversity**

- 4.1. We use inclusive and empowering language, which is accessible, takes account of language and literacy levels and cultural differences and is easy for children and young people to understand.
- 4.2. We value diversity and promote the participation of all children and young people engaged with our services. We will not tolerate any discriminatory practice. We identify and address any barriers for children and young people that may limit their participation.

## **5. Staff Recruitment and Suitability**

- 5.1. NLD apply a thorough recruitment, screening and selection process (in accordance with the Fair Work Act) and ensure staff are appropriately qualified, skilled and experienced to competently and safely deliver high quality services to children and young people.
- 5.2. The advertisement for each employment and volunteering position will clearly state our commitment as an organisation to child and youth safety and wellbeing.
- 5.3. All representatives will be required to undertake a Working with Children Check and hold a valid Blue Card prior to commencing employment or engagement with NLD. We understand that suitability and screening processes are a critical and legislated preventative measure to ensure child and youth safe environments, but we recognise that these cannot identify people who have not been previously convicted or are yet to offend. Accordingly, they are only one of the strategies required to prevent harm to children and young people and create safe environments.
- 5.4. Induction and ongoing training will be provided for all staff and volunteers on their child protection responsibilities, NLD's child protection policies and procedures, reporting obligations and the Code of Conduct.

## **6. Complaints and Feedback**

- 6.1. Children and young people who engage with our services are to be provided with information about other agencies or persons that they can raise concerns with and who are able to support them, or advocate on their behalf.
- 6.2. NLD provides an accessible policy for receiving, responding to and investigating complaints of child harm or abuse that prioritises the safety and wellbeing of children and young people. Complaints may relate to concerning conduct, misconduct or criminal conduct.
- 6.3. All complaints are to be taken seriously and responded to promptly, with procedural fairness and in line with NLD's relevant policies and procedures.
- 6.4. Training will be provided to staff on the complaints process, their roles and responsibilities, reporting and privacy obligations, and responding to children who disclose abuse (including recognising the different ways that children may disclose).

## **7. Staff Support and Development**

- 7.1. We build the capability of our staff through professional development, supervision and support, to promote and maintain a child and youth safe organisation.
- 7.2. Specific induction and training are provided to NLD Board members. This covers the responsibilities of the Board that are outlined within the National Principles for Child Safe Organisations.
- 7.3. New employees and volunteers are to participate in a comprehensive induction and onboarding process to child protection policies, procedures and practices. Managers will play a deeper role in ensuring these policies, procedures and practices are embedded.
- 7.4. We are committed to the provision of high-quality supervision practices for all staff encompassing regular reviews of workplace performance, behaviours and relationships, and opportunities to share observations and to safely explore views about child and youth safety issues.
- 7.5. Our employees participate in an annual performance review as a process by which managers can formally review their staff members' individual contribution to the provision and promotion of child and youth safe practices.
- 7.6. Any representative who receives a disclosure from a child or young person or reports harm or risk of harm to a child or young person will be well supported and will have access to an Employee Assistance Program.

## **8. Safe Physical and Online Environments**

- 8.1. Staff must abide by any program or activity-specific guidance outlined in policies such as; Mascot Policy, Use of Children's Images Policy, when undertaking specific practices involving children and young people.
- 8.2. Risk assessments, including the one included in Appendix A which assesses the organisations physical activities and functions, are completed as required. We provide clear guidelines to mitigate risks of child abuse that are identified in order to ensure residual risk is low.
- 8.3. Staff are required to complete an Activities and Special Events Risk Management Plan (Appendix B) to identify and address actions required to minimise risks to children and young people, prior to undertaking activities or special events involving children or young people.
- 8.4. We must take all allegations or disclosures of child abuse or neglect seriously, respond appropriately and report concerns following the Reporting Policy. Incidents, allegations or disclosures involving children and young people are to be internally reported, escalated and investigated as required, and externally notified or reported to our funders or agencies as required.
- 8.5. Our staff must complete induction and ongoing training on managing risks and creating safe environments, to ensure the safety, suitability and security of physical environments for children and young people in our services.
- 8.6. All third parties will be required to read and comply with NLD 's Code of Conduct and sign a Service Level Agreement prior to engaging their services.

## **9. Continuous Improvement**

- 9.1. NLD is committed to strengthening, embedding, and maintaining an organisation-wide child and youth safe culture through a process of ongoing continuous improvement.
- 9.2. We must implement an ongoing cycle of assessment, action and reflection including regular review of policies and practices to ensure child and youth safe policies and practices are understood and embedded at all levels of the organisation.
- 9.3. Incidents and complaints are to be critically reviewed to identify trends, identify and manage risks, and improve our child and youth safe policies, procedures and practices.

## **10. Identifying, Responding to, and Reporting Harm and Risk of Harm**

- 10.1. Safeguarding children and young people is the responsibility of all NLD staff. All children and young people have a right to feel safe, and to be safe at all times. NLD will not tolerate any abuse or neglect of children or young people involved with our service.
- 10.2. All staff must ensure the best interests of children and young people are paramount when responding to, and reporting concerns about, their safety and wellbeing.
- 10.3. All NLD policies and procedures for ensuring the safety and wellbeing of children and young people will be readily available through the HR system for staff to access. Non-staff members will have access through Human Resources. The Child Protection Policy, will be available on the NLD's website.
- 10.4. Our staff must be familiar with all policies and procedures relevant to their role to assist them to respond to children and young people appropriately and safely, should they disclose information to them about abuse or neglect.
- 10.5. Understanding and implementation of the child and youth safe policies and procedures by leaders, staff and volunteers will be measured through surveys conducted at least every two years.

## Policy Status and Review

This policy was approved by Chief Executive Officer in January 2024. Information and assistance with this policy is available from Human Resources. This Policy will be reviewed every two years. It may be reviewed more regularly if there are changes to relevant laws and/or regulatory guidelines so that the Policy remains current, effective and appropriate. Human Resources will be responsible for leading this process.



## Appendix

### Appendix A RISK ASSESSMENT

# Intake Risk Assessment Tool

#### Disclaimer:

This risk assessment tool is to be used in identifying safety risks for staff when providing services to young person and is intended to highlight any risks when first engaging with a young person. The risks/hazards included in this template are not an exhaustive list. Your completed risk assessment should reflect all potential hazards to meet your requirements. Where risks have been identified associated to the psychosocial needs or complex behaviour needs of a young person more specialised risk assessment may be required.

Client's Name:	
Name of referrer if not client:	
Relation and contact number of referrer:	
Client's Date of Birth:	
Client's NDIS Number:	
Client's Address:	
Client's Phone Number:	

## 1. intake assessment (to be completed prior to in-person meeting)

Personal Details			
Would you like an advocate present for this phone call?			
Who is the best contact for appointments?			
Client <input type="checkbox"/>	Other: <input type="checkbox"/>		

<b>Name:</b>		<b>Email:</b>	
<b>Preferred method of contact:</b>		<b>Relationship:</b>	
<b>When is the best time to make contact/appointments?</b>			
<b>Days:</b>		<b>Time:</b>	
<b>Communication Needs/Supports</b>			
<b>Are there any communication supports in place or required?</b>	If yes, please specify		
<b>Cultural Identity</b>			
<b>CALD background?</b>			
<b>Aboriginal or Torres Strait Islander?</b>			
<b>LGBTQIA+</b>			
<b>Interpreter required?</b>			
<b>Cultural considerations?</b>			
<b>Supported decision making/legal orders</b>	If yes, collect appropriate evidence		
<b>Does the client have an authorised person, guardian, or nominee in place?</b>			
<b>What decisions will they be involved in?</b>			
<b>Are there any current legal orders in place?</b>			
<b>Services request:</b>			
<b>Services client wishes to engage:</b>	Sup Coord: <input type="checkbox"/> Other: <input type="checkbox"/> _____		
<b>How many hours per week to allocate?</b>			
<b>Primary goals for service:</b>			
<b>Is this the client's first NDIS plan?</b>	Yes <input type="checkbox"/> No <input type="checkbox"/>		
<b>What are the dates of the plan?</b>	<b>Start:</b>		<b>End:</b>
<b>Consent to share a copy of the NDIS plan with ..... (service name)?</b>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Copy of NDIS plan provided?	Yes <input type="checkbox"/> No: <input type="checkbox"/>

Is there a current Behaviour Support Plan in place?	Yes <input type="checkbox"/> No <input type="checkbox"/>	If yes, has a copy been provided?	Yes <input type="checkbox"/> No: <input type="checkbox"/>	
<b>Worker preferences:</b>				
Gender/other attributes:		Skills:		
Is there anything additional you would like share before engaging in services?				

## 2. Safety assessment and consent

<b>General</b>		
Are you aware of anything that would be a danger to a visiting worker at your residence? No: <input type="checkbox"/> Yes: <input type="checkbox"/>	Details:	
<b>Housing</b>		
<b>Do you live with anyone?</b>		
No: <input type="checkbox"/> Yes: <input type="checkbox"/>	Relationship to you:	
Are they ever violent or aggressive towards anyone?		
<b>What type of housing do you live in?</b>		
Private: <input type="checkbox"/> Public: <input type="checkbox"/> SRS/Supported accom: <input type="checkbox"/> Aged care: <input type="checkbox"/> Other: <input type="checkbox"/>		
Is the house number visible from the street?		

Hazards	
Do you have anything in your house that would make it unsafe for workers to visit?	
Do you own any animals?	
Are there any weapons on the property?	
Does anyone smoke on the premises?	
Is there any alcohol or drug use on the premises?	
Is there anything additional you would like to share relevant to services?	
Billing Consent	
Participant understands that we will bill from their NDIS plan at the rate specified in the latest NDIS Support catalogue?	
Participant consent to creating a service booking?	

Were any risks Identified?	No: <input type="checkbox"/> Yes: <input type="checkbox"/>
If yes, what are they? Risk Management plan required (see below)	

# Risk Assessment and Management:

## Assigning a risk rating:

**Review the consequence table** and select a consequence category.

In the worst-case scenario, what would be the potential consequence of the identified risk(s)? Assign a consequence rating.

**Review the likelihood table** and select the likelihood that the identified risk(s) will result in the potential consequence (according to the worst-case scenario). Assign a likelihood rating.

**Plot the consequence rating and likelihood rating on the risk matrix.** The combined rating will either be Low, Moderate, High or Extreme. **This is the Risk rating.**

Likelihood		Consequences				
		Insignificant <i>No injuries or harm suffered</i>	Minor <i>First aid treatment applied</i>	Moderate <i>Medical treatment - potential long term harm</i>	Major <i>Permanent disability / disease suffered</i>	Severe <i>Fatalities involved</i>
Likelihood ↑	Rare <i>May occur in exceptional circumstances</i>	Low	Low	Low	Low	Moderate
	Unlikely <i>Could occur occasionally</i>	Low	Low	Low	Moderate	High
	Possible <i>Expected to occur occasionally</i>	Low	Low	Moderate	Moderate	High
	Likely <i>Expected to occur regularly</i>	Low	Moderate	Moderate	High	Extreme
	Almost certain <i>Expected to occur frequently</i>	Moderate	Moderate	High	Extreme	Extreme
		Impact - How serious is the risk? →				

## **Risk management plan**

A risk management plan should be developed for any high and extreme risks identified (or lower, as preferred/required), and consists of additional controls that can be implemented to minimise the risk.

Timelines and the individual responsible for implementing each control measure should form part of the plan. The plan should be monitored to ensure that agreed actions are completed, review dates should be specified, and the review should measure effectiveness of the control implemented.

<b>Risk Factor(s)</b>	• •	<b>Cause/Factors contributing to this risk</b>	• •
<b>Evidence of risk</b> - Include description and source(s) of information. Supporting evidence may be attached.		<b>Impact</b> - What is the impact of this risk?	
• •		• •	
<b>Controls</b> - What actions are planned/have been implemented in order to manage this risk? If implemented, state when and detail the outcome so far.		<b>Monitoring</b> - How are you monitoring the risk?	
• •		• •	
<b>Risk Factor/Hazard</b>	<b>Date of original risk assessment</b>		<b>Date of subsequent risk assessment (to monitor effectiveness of controls)</b>
	<b>Consequence Rating</b>	<b>Likelihood Rating</b>	<b>Combined Rating</b>

Risk Rating			

Revised Risk Rating		

Review: By the date specified in the agreed risk action plan, or earlier if circumstances change:

- Gather information and update the risk assessment tool document
- Record the revised risk rating on the Risk Assessment Tool or via Brevity.

**Review Date:** January 2024



## Appendix B



# ACTIVITIES AND SPECIAL EVENTS RISK MANAGEMENT PLAN

## No Limits Disability

Date Completed: \_\_\_\_\_

Completed by: \_\_\_\_\_

STEP 1	STEP 2	STEP 3	STEP 4	STEP 5	STEP 6
<b>Describe the activity</b> Identify all elements of the event from beginning to end	<b>Identify Risks</b> Something that could happen that results in harm to a child or young person	<b>Analyse the Risk</b> Likelihood <i>(Almost certain, Likely, Possible, Unlikely or Rare)</i> and Consequences <i>(Critical, Major, Moderate, Minor or Insignificant)</i>	<b>Evaluate the Risk</b> The level of risk <i>(using the Risk Analysis Matrix)</i>	<b>Manage the Risk</b> Assess the options	<b>Review</b> Nominate who will review after the event/activity